



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20461

THIS IS THE END OF MUR # 1412

Date Filmed 5/30/84 Camera No. --- 4

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FEDERAL ELECTION COMMISSION

Conciliation, routing cards  
tally sheet objection memo  
Had Referral Cover Sheet, Memo  
to file

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):

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

Signed

date

D. Cunningham  
5-29-84

FEC 9-21-77

512  
 DD  
 5-30-84

84040455126



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 4, 1984

James Bopp, Jr., Esquire  
Bramas, Bopp, Haynes & Abel  
P. O. Box 1583  
Terre Haute, Indiana 47808

Re: MUR 1412  
National Right To Life Committee  
National Right To Life Political  
Action Committee

Dear Mr. Bopp:

On May 2, 1984, the Commission accepted the conciliation agreement signed by your clients in settlement of a violation of 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

Enclosure

Conciliation Agreement

8404045127



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Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

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Conciliation Agreement

YGR

84040455128





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General Counsel

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Charles N. Steele  
General Counsel

Enclosure

Conciliation Agreement

JAR

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

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

Sincerely,

Charles N. Steele  
General Counsel

Enclosure

Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

National Right to Life Committee  
National Right to Life Political  
Action Committee

MUR 1412

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 2, 1984, the Commission decided by a vote of 6-0 to take the following actions in MUR 1412:

1. Accept the proposed signed conciliation agreement for NRLC and NRLPAC, attachment 1 of the General Counsel's April 30, 1984, Memorandum to the Commission.
2. Approve the proposed notification letter to Mr. James Bopp, Jr., attorney for NRLC and NRLPAC, attachment 2 of the General Counsel's April 30, 1984, Memorandum to the Commission.
3. Close the file in MUR 1412.

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

Attest:

5-3-84

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary:  
Circulated on 48 hour tally basis:

4-30-84, 1:01  
4-30-84, 4:00

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**National Right to Life  
Political Action Committee  
and  
National Right to Life  
Committee, Inc.**

**MUR 1412**

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

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

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

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

1. NRLPAC is a political committee and the separate segregated fund of NRLC. NRLPAC is registered with the Federal Election Commission.

2. NRLC is the connected organization of NRLPAC.

3. This matter can be divided into essentially two transactions-

a. NRLCPAC's FEC Reports disclose that, prior to July 31, 1980, NRLPAC had paid \$3,345.19 in administrative expenses. The first transaction on July 31, 1980, was a repayment from NRLC to NRLPAC of \$1,159.28. This repayment was reported by NRLPAC in its October 1980 Quarterly Report and was characterized as a reimbursement of administrative expenses.

b. The second transaction involves an attempt by NRLC to repay a \$9,000 loan to NRLPAC.

i. On October 16, 1980, NRLPAC loaned NRLC \$9,000.

ii. On December 18, 1980, NRLC made a repayment to NRLPAC of \$3,000. This repayment was reported by NRLPAC in its 1980 Year End Report and was characterized as a loan repayment.

iii. NRLPAC was informed by the Reports Analysis Division that the loan repayment by NRLC to NRLPAC

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was illegal under the Act, unless the loan repayment was made with funds "which are subject to the prohibitions of 11 C.F.R. 110.4(a) and Part 114". See 11 CFR 100.7(a)(1)(D).

iv. NRLPAC's FEC Reports disclose that prior to December 18, 1980, NRLPAC had paid \$8,884.44 in administrative expenses of which only \$1,159.28 had been previously reimbursed. Thereafter, NRLPAC in an amendment to its 1980 Year End Report changed the description of the \$3,000 transaction from a loan repayment to a repayment for reimbursement of administrative expenses.

v. NRLPAC's FEC Reports disclose that, prior to February 27, 1981, NRLPAC had paid \$14,274.76 in administrative expenses of which only \$4,159.28 has been reimbursed by NRLC. Subsequently, NRLPAC reported on its 30 Day Run Off Report for 1981 a repayment of \$6,000 from NRLC to NRLPAC. NRLPAC characterized this repayment as a reimbursement of administrative expenses.

vi. The receipt by NRLPAC of \$3,000 from NRLC as reported in its amendment to its 1980 Year End Report plus the additional receipt by NRLPAC of \$6,000 from NRLC as reported in its 30 Day Run Off Report for 1981 equals the total amount of the loan NRLPAC made to NRLC.

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V. The pertinent legal findings for this matter are as follows:

1. 2 U.S.C. § 441b(a) expressly prohibits corporate contributions or expenditures in connection with federal elections. See also 11 C.F.R § 114.2(b).
2. Similarly, 2 U.S.C. § 441b(a) prohibits the acceptance of such prohibited contributions.
3. The term "contribution" includes any direct or indirect payments by a corporation, including repayment of a loan, in connection with a federal election (except a loan of money by a national or State bank made in accordance with the applicable banking laws and regulations and in the ordinary course of business). 2 U.S.C. § 441b(b) (2).
4. 2 U.S.C. § 441b(b) (2) (c) provides an exemption for corporate funds used in the establishment, administration, and solicitation of contributions to a separate segregated fund of the corporation.
5. This exemption for establishment, administration and solicitation costs may not be used to exchange treasury monies for voluntary contributions to a separate segregated fund. See 11 C.F.R. § 114.5(b).
6. Establishment, administration, and solicitation costs must be paid for directly by the corporation.
7. Subsequent reimbursement by a connected organization to its separate segregated fund of establishment, administration and solicitation costs

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constitutes commingling of voluntary and treasury funds in violation of the Act.

8. Additionally, repayment of a loan by a connected organization to its separate segregated fund constitutes an illegal corporate contribution in violation of the Act.

WHEREFORE, Respondents agree:

VI. For the purpose of resolving this matter without litigation, the respondents admit that NRLC's payment to NRLPAC as reimbursement of administrative expenses or as loan repayments and NRLPAC's receipt or acceptance of such payment constituted a violation of 2 U.S.C. § 441b.

VII. Respondents contend that they did not knowingly or willfully violate the Act.

VIII. Respondents further agree that NRLPAC shall return to NRLC the amount of \$10,159.28 previously paid to it by NRLC.

IX. Respondents shall pay a civil penalty to the Treasurer of the United States in the amount of two hundred fifty dollars (\$250) dollars pursuant to 2 U.S.C. § 437g(a)(5)(A).

X. Respondents 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.

#### GENERAL CONDITIONS

XI. The Commission, on request of any one filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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

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

Charles N. Steele  
General Counsel

By: [Signature]  
Kenneth A. Gross  
Associate General Counsel

National Right to Life  
Political Action Committee

By: [Signature]  
Its: [Signature]

National Right to Life  
Committee, Inc.

By: [Signature]  
Its: [Signature]

84040455138

May 4, 1984  
Date

April 15, 1984  
Date

April 15, 1984  
Date

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

National Right to Life  
Political Action Committee and  
National Right to Life  
Committee, Inc.

MUR 1412

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission Executive Session on January 24, 1984, do hereby certify that the Commission decided by a vote of 4-1 to take the following actions in MUR 1412:

1. Reject the agreement offered by Respondents in settlement of this matter.
2. Authorize the Office of General Counsel to file a civil suit for relief in the United States District Court against: National Right to Life Political Action Committee and National Right to Life Committee, Inc.

Commissioners Aikens, McDonald, McGarry, and Reiche voted affirmatively for the decision; Commissioner Elliott dissented; Commissioner Harris abstained in the vote.

Attest:

1-25-84

Date

Marjorie W. Emmons  
Marjorie W. Emmons  
Secretary of the Commission

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

National Right to Life  
Political Action Committee

and

National Right to Life Committee, Inc.

MUR 1412

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission Executive Session on August 9, 1983, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 1412:

1. find probable cause to believe that the National Right to Life Political Action Committee violated 2 U.S.C. §441b;
2. find probable cause to believe that the National Right to Life Committee violated 2 U.S.C. §441b; and
3. approve and authorize the sending of the conciliation agreement and letter attached to the FEC General Counsel's report dated July 27, 1983.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry, and Reiche voted affirmatively for the decision.

Attest:

8-10-83

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

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June 20, 1983

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

Re: MUR 1412

Dear Mr. Steele:

I am in receipt of your letter of June 10, 1983, and the General Counsel's Brief regarding this matter. This letter is in response thereto.

This matter arose as a result of a letter of April 30, 1981, from Mark Kleinman of the FEC's Reports Analysis Division. A copy of this letter is attached. In this letter, we were informed that a loan repayment, as NRLC was attempting to do, could not be made except from appropriately segregated funds. As a result of this information, John Stanton, then treasurer of NRLPAC, and I had several conversations with Mr. Kleinman so that this matter might be resolved. As a result of these conversations, we were informed that we might show these amounts to be reimbursement of administrative expenses which had been incurred by the PAC and which NRLC might reimburse the PAC for. Thus, NRLPAC amended its reports to show that these amounts were reimbursement of administrative expenses, which had previously been reported by the PAC to the FEC, and were well in excess of the reimbursements by NRLC to it.

NRLPAC was expressly led to believe by Mr. Kleinman that reimbursement of administrative expenses by NRLC to NRLPAC was allowed and, thus, the appropriate amendments were filed. I have enclosed a copy of my letter of May 19, 1981, and a letter by Mr. Stanton on May 30, 1981, reflecting this understanding. In addition, you will note the record of a phone conversation on June 2, 1981, between Mr. Stanton and Mr. Kleinman reflecting that this matter had apparently been resolved.

In addition to the representations made by Mr. Kleinman, at the time of this transaction, the position of the Federal Election Commission had apparently been clear that a reimbursement

## FRIEND'S LAYMARK

Mr. Charles N. Steele  
June 20, 1983

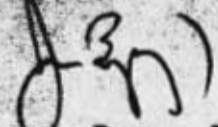
Page Two

of administrative expenses was allowable. Advisory Opinions 1976-111, 1979-33 and 1979-72 had all allowed reimbursement of administrative expenses to a PAC. It appears now, however, that the FEC has changed its position on this matter or, in the alternative, has clarified its opinion, through AO 1982-42, that reimbursement of administrative expenses is not allowable. As you will note, however, this transaction took place considerably before this change in position or clarification was issued.

If NRLPAC had been aware that the FEC considered repayment of administrative expenses to be disallowed, or had been informed of such by Mr. Kleinman, NRLPAC would have repaid the funds paid to it by NRLC. My clients are willing to do that now. Thus, my clients are willing to attempt a resolution of this matter through a conciliation agreement. My clients certainly did not intend to do anything other than what is allowed by Federal Election law. If they have done otherwise, they did so in good faith based upon existing Advisory Opinions of the FEC and advice of FEC employees. Please let us know upon what basis this matter can be resolved.

Sincerely,

BRAMES, BOPP & HAYNES

  
James Bopp, Jr.

JB:maw

Enclosures

cc: John C. Willke, M.D.  
Warren Sweeney  
Sandra Faucher  
Philip Moran

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 30, 1981

John Stanton, Treasurer  
National Right to Life  
Political Action Committee  
529 14th Street, N.W.  
Suite 341  
Washington, DC 20045

Identification No: C00111278

Reference: Year End Report (11/25/80 to 12/31/80)

Dear Mr. Stanton:

This letter is prompted by the Commission's preliminary review of your Year End Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

-Please clarify the source of funds for the entry on Schedule A, Line 14 from National Right to Life Committee (date of incorporation 5/14/73) for "loan repayment" (pertinent portion attached). You are advised that 11 C.F.R. 100.7(a)(1)(D) requires that loan repayments be made with funds "which are subject to the prohibitions of 11 C.F.R. 110.4(a) and Part 114" (no corporate funds).

If you have found that the loan repayment was made from funds which are not permissible under the Regulations, then you should refund the amount which is prohibited.

Although the Commission may take further legal steps concerning the acceptance of funds from a prohibited source, your prompt action with regards to this matter will be taken into consideration by the Commission.

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel

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John Stanton  
National Right to Life  
Political Action Committee

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free to contact me on our toll free number, (800) 424-9530. My local  
number is (202) 357-0026.

Sincerely,

*Mark Kleinman*

Mark Kleinman  
Reports Analyst  
Reports Analysis Division

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**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 1 of 1  
LINE NUMBER 10  
THIS SCHEDULE ACCOMPANIES THE COPY  
OF THE RETURN  
Summary Page

Any information copied from such Reports or Statements may not be used by any person for the purpose of conducting operations or for commercial purposes, other than as the name and address of any individual contributing to which contributions from such contributors.

Name of Contributor (in Full)

**National Right to Life Political Action Committee**

A. Full Name, Mailing Address and ZIP Code

**National Right to Life Committee  
Suite 341, National Press Bldg.  
529 14th Street, N. W.  
Washington, D.C. 20045**

Name of Employer

**SN-14-73**

Date (month, day, year)

**12-18-80**

Amount of Each Receipt This Period

**3,000.00**

Receipt For ☐ Primary ☐ General

☐ Other (specify): **Loan repayment**

Description

Aggregate Year-to-Date-\$

B. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Description

Aggregate Year-to-Date-\$

Receipt For ☐ Primary ☐ General

☐ Other (specify):

C. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Description

Aggregate Year-to-Date-\$

Receipt For ☐ Primary ☐ General

☐ Other (specify):

D. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Description

Aggregate Year-to-Date-\$

Receipt For ☐ Primary ☐ General

☐ Other (specify):

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Description

Aggregate Year-to-Date-\$

Receipt For ☐ Primary ☐ General

☐ Other (specify):

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Description

Aggregate Year-to-Date-\$

Receipt For ☐ Primary ☐ General

☐ Other (specify):

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Description

Aggregate Year-to-Date-\$

Receipt For ☐ Primary ☐ General

☐ Other (specify):

H. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Description

Aggregate Year-to-Date-\$

SUBTOTAL of Receipts This Period

**3,000.00**

TOTAL This Period

**3,000.00**

84040455145

3177777777

**BRAMES, BOPP & HAYNES**

**ATTORNEYS AT LAW**

900 SYCAMORE BUILDING

19 SOUTH SIXTH STREET

TERRE HAUTE, INDIANA 47807

ARNOLD H. BRAMES  
JAMES BOPP, JR.  
DAVID D. HAYNES

TELEPHONE  
(317) 238-3421

May 19, 1981

Mr. Mark Kleinman, Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
1325 K Street, N. W.  
Washington, D. C. 20463

Re: Your Letters of April 30, 1981

Dear Mr. Kleinman:

As General Counsel for the National Right to Life Political Action Committee, your letters of April 30, 1981, have been referred to me for response.

With respect to each:

1. Enclosed is an amendment to our year end report reflecting the fact that, as we discussed, we are changing our record to reflect the fact that the \$3,000.00 payment from NRLC to NRLPAC was reimbursement of administrative expenses, not a loan repayment as we previously reported. In addition, you will note on our May 11, 1981, report, NRLC has again paid the PAC \$6,000.00 as a repayment of administrative expenses. Total payments to date by NRLC to the PAC to reimburse it for administrative expenses amount to \$10,159.28. To date NRLPAC has expended \$14,174.76 for administrative expenses. The great bulk of it is now repaid.


In addition, the loan of \$9,000.00 to NRLC is still reflected on our books. When it becomes desirable for us to repay this loan, we will establish, as a result of your suggestions, a separate bank account into which only contributions to NRLC from individuals will be placed. From this account, the loan will be repaid.

2. With respect to our 12 day pre-general election report and 30 day post-general election reports, we have included herewith an amendment reflecting the total amount of itemized contributions we received during that period.

If you have any questions regarding this matter, please contact me at the above address.

Sincerely,

BRAMES, BOPP & HAYNES

  
James Bopp, Jr.

JB:maw

8404045146



**National  
RIGHT TO LIFE**

Suite 341, National Press Bldg. — 529 14th Street, N.W. —  
Washington, D. C. 20045 — (202) 838-4396

**political action committee**

5-30-81

Dear Mr Kleinman,

Please excuse our delay  
in responding to your note of 4-30-81

Enclosed are amendments to  
our reports. Per your advice we have  
changed the noted transactions from loan  
repayments to reimbursements of administrative  
expense.

Thank you for your help.

J. P. Stanton

Treas.

6-2-81

Called Kleinman this am. Per him, "everything  
on surface appears O.K.". Have him my office  
+ in event he has questions — comments.

JPS.

J. Bopp

W. Roub

P. Moran

8404045514  
BRAMES, BOPP & HAYNES

ATTORNEYS AT LAW

900 SYCAMORE BUILDING

19 SOUTH SIXTH STREET

TERRE HAUTE, INDIANA 47807-3597

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







FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

83 JUN 10 P 4: 34

June 10, 1983

MEMORANDUM TO: The Commission

FROM: Charles N. Steele *[Signature]*  
General Counsel

SUBJECT: MUR 1412 - National Right to Life Political  
Action Committee and National Right to  
Life Committee, Inc.

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 respondents of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on June 10, 1983. Following receipt of the Respondents' reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief (pages 1-8)
2. Letter to Respondents (pages 9-10)

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BEFORE THE FEDERAL ELECTION COMMISSION

Attachment 1

①

In the Matter of

National Right to Life  
Political Action Committee/  
National Right to Life Committee, Inc.

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)  
)  
)  
)

MUR 1412

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

This matter was generated by the Reports Analysis Division (hereinafter "RAD"), after its analysis of the disclosure reports of the National Right to Life Political Action Committee (hereinafter "NRLPAC"). RAD noted during review of several of NRLPAC's Reports of Receipts and Expenditures, that NRLPAC received funds from its connected organization National Right to Life Committee, Inc. (hereinafter "NRLC") possibly constituting a corporate contribution in violation of the Federal Election Campaign Act of 1971, as amended (hereinafter the "Act"), specifically 2 U.S.C. § 441b.

On September 29, 1982, the Commission found reason to believe that the National Right to Life Political Action Committee and National Right to Life Committee, Inc. violated 2 U.S.C. § 441b. The Commission also approved and authorized the sending of letters and interrogatories to the respondents. Respondents answered the interrogatories on January 20, 1983.

R 4040455150

## II. FACTUAL ANALYSIS

The facts of this MUR can be divided into essentially two transactions. The first transaction was a repayment from NRLC to NRLPAC of \$1,159.28. This repayment was reported by NRLPAC in its October 1980 Quarterly Report and was characterized as a reimbursement of administrative expenses.

The second transaction involves what appears to be an attempt by NRLC to repay a \$9,000 loan to NRLPAC. On October 16, 1980 NRLPAC loaned NRLC \$9,000. On December 18, 1980, NRLC made a repayment to NRLPAC of \$3,000. This repayment was reported by NRLPAC in its 1980 Year End Report and was characterized as a loan repayment. Subsequently, respondents were informed by a RAD Analyst that the loan repayment by NRLC to NRLPAC was illegal under the Act. Thereafter, NRLPAC in an amendment to its 1980 Year End Report, changed the description of the \$3,000 transaction to a repayment for reimbursement of administrative expenses. Subsequently repayment of \$6,000 was reported as a reimbursement of administrative expenses on NRLPAC's 30 Day Run Off Report for 1981. The receipt by NRLPAC of \$3,000 from NRLC in its Year End Amendment (1980) plus the additional receipt of \$6,000 in the 30 Day Run Off Report equals the total amount of the loan NRLC originally sought to pay back in the initial Year End Report (1980).

As of March 24, 1981, NRLPAC indicated that it had incurred \$14,274.76 in administrative expenses. Most of these expenses are now repaid since total payments to date from NRLC to NRLPAC

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2 U.S.C. § 441b(a) expressly prohibits corporate contributions or expenditures in connection with federal elections. See also 11 C.F.R. § 114.2(b). Similarly, 2 U.S.C. § 441b(a) prohibits the acceptance of such prohibited contributions. 2 U.S.C. § 441b(b)(2) elaborates on the meaning of contribution or expenditure stating -

(2) for purposes of this section ... the term "contribution or expenditure" shall include any direct or indirect payment, distribution, loan, advance, deposit, or gift of money, or any services, or anything of value ... to any candidate, campaign committee, or political party or organization, in connection with any of the offices referred to in this section.... (emphasis added). See also 11 C.F.R. § 114.1(a)(1).



While 2 U.S.C. § 441b expressly forbids corporate contributions and the acceptance of such contributions in connection with a federal election it does provide for an exception to this broad prohibition. 2 U.S.C. § 441b(b) (2) (C) provides an exemption for corporate funds used in the establishment, administration, and solicitation of contributions to a separate segregated fund of the corporation. These monies are not considered contributions or expenditures under the Act. § 11 C.F.R. § 114.1(a) (2) (iii). Generally, however, this exemption for establishment, administration and solicitation costs may not be used as a means to exchange treasury monies for voluntary contributions to a separate segregated fund. 11 C.F.R. § 114.5(b); See also A.O. 1979-72 and A.O. 1982-42.

Neither the Act nor Commission Regulations further define the phrase "separate segregated fund." However the Supreme Court in Pipefitters v. United States, 407 U.S. 385 (1972) has interpreted that term as requiring a strict segregation of political funds from treasury funds. The Court construed the terms "separate" and "segregated" when referring to a union's control of its political fund, stating that "a fund must be separate from the sponsoring union only in the sense that there must be strict segregation of its monies from union dues and assessments." 407 U.S. at 414.

Further, American Federation of Labor and Congress of Industrial Organizations v. FEC, 628 F. 2d 97 (D.C. Cir. 1979), cert. denied, 449 U.S. 982 (1980), involved the issue of

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repayment of a loan to a political fund. The Court upheld the finding of a violation of 2 U.S.C. § 441b and agreed with the lower court that the requirement for a political fund to be separate and segregated from treasury funds means that no part of the monies of a political fund may be commingled even temporarily with dues monies.

There are strong policy reasons for preventing corporations from reimbursing their separate segregated funds for administrative costs, instead of the corporation paying these costs directly. One reason is that unrestricted reimbursement would commingle and intertwine funds so as to obscure their sources. Another reason is the potential of using such transactions to get excess treasury funds into the political fund. These concerns are at the base of the general rule of strict segregation of treasury and political funds.

Therefore, subsequent reimbursement by a corporation to its separate segregated fund would constitute commingling of voluntary and treasury funds in violation of the Act. Additionally, any direct or indirect payment (loan repayment) would clearly constitute a violation of the Act.

Respondents have never challenged the Commission's position that loan repayments by NRLC to NRLPAC are in violation of the Act. Respondents have accepted this as a basic proposition and this is the sole reason why loan repayments were amended and

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later characterized as reimbursement of administrative expenses. Believing the legality of such reimbursements NRLC changed an initial loan repayment of \$3,000 and later possible loan repayments of \$6,000 to reimbursements of administrative expenses. The fact that the NRLC reimbursement and loan repayments equal each other evidences an intent to use the reimbursement of administrative expenses as a guise to repay the loan to NRLPAC in violation of the Act.

With regard to reimbursement of administrative expenses, respondents contention throughout has been that the Act authorizes a connected organization to reimburse its separate fund for administrative expenses paid by the PAC. Respondents reason that since these administrative expense could have been paid for by NRLC, then NRLC may reimburse NRLPAC for these expenses.

Respondents conclude therefore that there is no requirement that a corporation must pay the administrative expenses directly or that such monies must be segregated into an account separate from the contributions account. Respondents rely on three A.O.s (AOR 1976-111; AO 1979-33; AO 1979-72) to support their contention that reimbursements of administrative expenses are permissible under the Act. However, Respondents reliance on these A.O.s is misplaced.

Each of the A.O.s relied on by Respondents is distinguishable from the factual situation of this matter. In A.O.R 1976-111, AO 1979-33 and AO 1979-72, the Commission did

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permit a connected organization to reimburse its separate segregated fund. However, each of these factual situations involved -

- 1) an isolated act not a continuous course of conduct;
- 2) a mistake of fact or inadvertence; and
- 3) a reimbursement made within a reasonable time.

Recently, in A.O. 1982-42 the Commission did not allow the connected organization to reimburse its PAC for expenses incurred in connection with the establishment, administration and solicitation of contributions to its separate segregated fund. The Commission found that A.O. 1982-42 was factually distinguishable from the A.O.s already cited here. The Commission concluded that the factual situation in A.O. 1982-42 "was not merely a solitary factual mistake, but was instead an established course of considered, discretionary conduct over several years."

The general rule prohibits corporate payments (loans or reimbursements) to a political fund. Though the Commission has carved out limited exceptions to this rule, the facts of this matter do not fall within the parameters of these exceptions.

Respondents have never cited inadvertence or mistake of fact as the reason for these reimbursements. Indeed, Respondents state that the reason NRLC did not pay these expenses directly was because it was in debt. The reimbursements were not a one time isolated event but a continuous course of conduct over a

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couple of years. It also appears that this conduct will continue into the future, since NRLPAC reports indicate that administrative expenses are still not being paid directly. Therefore, NRLC's payments for reimbursement of administrative expenses and loan repayments violated 2 U.S.C. § 441b.

IV. GENERAL COUNSEL'S RECOMMENDATION

Find probable cause to believe National Right to Life Political Action Committee and National Right to Life Committee, Inc. violated 2 U.S.C. § 441b.

10 June 1983  
Date

  
\_\_\_\_\_  
Charles N. Steele  
General Counsel

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 10, 1983

James Bopp, Jr.  
BRAMES, BOPP & HAYNES  
900 Sycamore Building  
19 South Sixth Street  
Terre Haute, Indiana 47807

Re: MUR 1412

Dear Mr. Bopp:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by your clients the Federal Election Commission, on September 29, 1983, found reason to believe that your clients National Right to Life Political Action Committee and National Right to Life Committee, Inc. had violated 2 U.S.C. § 441b, and instituted an investigation in 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 if possible) 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, if possible.) 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.

If you are unable to file a responsive brief within 15 days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond 20 days.

Attachment #2 9

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Attachment #2 10

James Bopp, Jr.  
Page Two

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.

Should you have any questions, please contact Deborah Curry, at (202) 523-4000.

Sincerely,



Charles N. Steele  
General Counsel

Enclosure  
Brief

84040455159

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

National Right to Life  
Political Action Committee/  
National Right to Life  
Committee, Inc.

MUR 1412

**SENSITIVE**

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OFFICE OF THE  
COMMISSION SECRETARY

COMPREHENSIVE INVESTIGATIVE REPORT #1

This matter was generated by the Reports Analysis Division, after its analysis of the disclosure reports of the National Right to Life Political Action Committee (hereinafter "NRLPAC"). RAD noted, during review of several of NRLPAC's Reports of Receipts and Expenditures that NRLPAC received funds from its connected organization National Right to Life Committee, Inc. (hereinafter "NRLC") possibly constituting a violation of the Federal Election Campaign Act of 1971, as amended (hereinafter the "Act").

The facts of this MUR can be divided into essentially two transactions. The first transaction being the repayment by NRLC of \$1,159, noted in the October 1980 Quarterly Report, that was characterized as a reimbursement of administrative expenses by NRLPAC. The second transaction being a repayment of \$3,000 that was characterized in the 1980 Year End Report as a loan repayment by NRLC to NRLPAC. In an amendment to the 1980 Year End Report this repayment was changed to a repayment for reimbursement of administrative expenses. A second repayment of \$6,000 was also reported as reimbursement of administrative expenses. The total

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amount of reimbursements for administrative expenses (\$9,000) equals the total amount of the loan (\$9,000) reported by NRLPAC on its initial Year End Report.

Based on the above facts, on September 29, 1982, the Commission found reason to believe that the National Right to Life Political Action Committee and National Right to Life Committee, Inc. violated 2 U.S.C. § 441b. They also approved and authorized the sending of letters and attached interrogatories to the respondent committees.

On October 14, 1982, the letter and enclosed interrogatories were returned by the postal service with postal markings stating "moved left no address." On October 15, 1982, the Office of General Counsel remailed the letters and interrogatories.

On November 1, 1982, the respondents were granted an extension of time to answer the interrogatories until November 29, 1982. On November 30, 1982, the Office of General Counsel was notified by counsel's secretary that there would be a delay in the answer. On December 8, 1982, the Office of General Counsel received a letter from a partner of counsel for respondents explaining and requesting an extension of time until January 14, 1983 due to the surgery and recovery time needed by counsel because of a torn retina.

On January 10, 1983, the Commission granted an extension of time to answer interrogatories until January 14, 1983. On January 20, 1983, the Office of General Counsel received the response to the interrogatories.

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Respondents answer the interrogatories broadly but without specificity. Respondents do not identify the purpose, amount and date of each administrative expense questioned.

Respondents' answers imply that since NRLPAC had \$14,274.76 in administrative expenses as of March 24, 1981, then it is unnecessary to identify what part was reimbursed. (See Answer 1, Attachment 1 page 2 of attachments).

We have reviewed all the reports of NRLPAC from 1980-1982. Attached to this report are all of the administrative expenses incurred by NRLPAC during the above-mentioned time period. (See Attachment 2, pages 5-22 of attachments). Assuming that NLRC reimbursed some of NRLPAC's administrative expenses, none of these expenses were reimbursed within a reasonable amount of time.

Respondents try to evade the issue of the loan repayment, though it appears that such an attempt was made with regard to the \$3,000 that was changed to a reimbursement for administrative expenses. Respondents' state that the change was made when they were informed by the RAD Analyst that the loan repayment by NRLC to NRLPAC was illegal under the Act. (See Answer 3, Attachment 1 page 2 of attachments). The dates of the loan repayment and the reimbursement of administrative expense are identical. Additionally, no loan instruments were received, though NRLPAC has continued to report the outstanding \$9,000 loan on its

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reports. It appears that the administrative expenses were not paid for directly by NRLC because it was in debt. (See Answer 1(b) and 4(b), Attachment 1, page 2 and 3 of attachments).

Respondents also state that administrative expenses are now being paid by NRLC when they are incurred. (See Answer 4(b), Attachment 1 page 3 of attachments). However, according to NRLPAC reports this does not seem to be the case, as NRLPAC is still reporting disbursements for administrative expenses. (See Attachment 2 pages 19-22 of attachments).

The Office of General Counsel is in the process of preparing a brief of the legal and factual issues of the case. As soon as it is completed it will be circulated to the Commission.

March 23, 1983  
Date

Charles N. Steele  
General Counsel

BY:

Kenneth A. Gross  
Associate General Counsel

Attachments

1. Respondents' Answers to the Interrogatories (pages 1-4)
2. Reports of National Right to Life Political Action Committee (pages 5-22)

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BRAMES, BOPP & HAYNES  
ATTORNEYS AT LAW  
200 SYCAMORE BUILDING  
10 SOUTH SIXTH STREET  
TERRE HAUTE, INDIANA 47807-3597

ARNOLD H. BRAMES  
JAMES BOPP, JR.  
DAVID D. HAYNES

January 14, 1983

Attachment

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Ms. Deborah Curry, Esq.  
Federal Election Commission  
1325 K Street, N.W.  
Washington, DC 20463

Re: MUR 1412

Dear Ms. Curry:

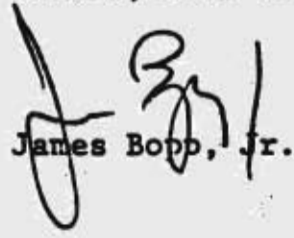
Enclosed herewith are our Answers to Interrogatories previously submitted by you.

I regret the delay we have had in this matter. As you know, I suffered a retina detachment for which I have spent several weeks in the hospital and several additional weeks recuperating. I am just now at the point where I can read.

If you have any questions regarding these Answers, please let me know.

Sincerely,

BRAMES, BOPP & HAYNES

  
James Bopp, Jr.

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Enclosure

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ANSWERS TO INTERROGATORIES

MUR 1412

1. a. The National Right to Life Political Action Committee has paid on its own behalf administrative expenses in the total amount of \$14,274.76 as of March 24, 1981. These administrative expenses were reported on the appropriate forms filed with the Federal Election Commission. The first such administrative expense was on March 20, 1980. This expense was listed on the first quarterly report for 1980 filed with the Federal Election Commission and was in the amount of \$669.88. In the second quarterly report for 1980, the PAC incurred administrative expenses in the amount of \$2,675.31 for a total of \$3,345.19 for the first six months of 1980. On July 31, 1980, the National Right to Life Committee reimbursed part of these administrative expenses which is the receipt in question.
  - b. These administrative expenditures were not paid for directly by NRLC because they were in debt.
  - c. No.
2. a. NRLPAC did make a loan of \$9,000.00 to NRLC on October 16, 1980. There are no loan instruments.
  - b. No.
3. a. The June 2, 1981, NRLPAC year end amendment shows a change from a loan repayment to a \$3,000.00 payment for reimbursement of administrative expenses. This change occurred due to an inquiry from Mark Kleinman of the Reports Analysis Division of the Federal Election Commission who indicated to us that NRLC may not make a loan repayment unless that money had been segregated when collected by NRLC and paid to the PAC from this separate account. There, however, was no such requirement indicated to us for the reimbursement of administrative expenses. Attached hereto is the May 19, 1981, letter to Mr. Kleinman reflecting this transaction.
  - b. By May 19, 1981, NRLPAC had reported to the Federal Election Commission that it had expended \$14,174.76 for administrative expenses. The \$3,000.00 reimbursement was in addition to the \$1,940.45 previously reported as a reimbursement.
4. a. See answer to 3.b.

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4. b. The National Right to Life Committee was in debt when the decision was made for the PAC to advance certain administrative expenses. The \$14,174.76 in administrative expenses was therefore accumulated by the PAC. Later NRLC decided to directly pay these administrative expenses when they were incurred.

c. No.

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BRAMES, BOPP & HAYNES

ATTORNEYS AT LAW

800 SYCAMORE BUILDING

18 SOUTH SIXTH STREET

TERRE HAUTE, INDIANA 47807

ARNOLD H. BRAMES  
JAMES BOPP, JR.  
DAVID D. HAYNES

TELEPHONE  
(317) 236-2421

May 19, 1981

Mr. Mark Kleinman, Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
1325 K Street, N. W.  
Washington, D. C. 20463

Re: Your Letters of April 30, 1981

Dear Mr. Kleinman:

As General Counsel for the National Right to Life Political Action Committee, your letters of April 30, 1981, have been referred to me for response.

With respect to each:

1. Enclosed is an amendment to our year end report reflecting the fact that, as we discussed, we are changing our record to reflect the fact that the \$3,000.00 payment from NRLC to NRLPAC was reimbursement of administrative expenses, not a loan repayment as we previously reported. In addition, you will note on our May 11, 1981, report, NRLC has again paid the PAC \$6,000.00 as a repayment of administrative expenses. Total payments to date by NRLC to the PAC to reimburse it for administrative expenses amount to \$10,159.28. To date NRLPAC has expended \$14,174.76 for administrative expenses. The great bulk of it is now repaid.

In addition, the loan of \$9,000.00 to NRLC is still reflected on our books. When it becomes desirable for us to repay this loan, we will establish, as a result of your suggestions, a separate bank account into which only contributions to NRLC from individuals will be placed. From this account, the loan will be repaid.

2. With respect to our 12 day pre-general election report and 30 day post-general election reports, we have included herewith an amendment reflecting the total amount of itemized contributions we received during that period.

If you have any questions regarding this matter, please contact me at the above address.

Sincerely,

BRAMES, BOPP & HAYNES

James Bopp, Jr.

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1980 July Quarterly  
4-1-80 through 6-30-80  
July Quarterly  
Amended

5

Attachment 2

SCHEDULE B

ITEMIZED DISBURSEMENTS

Form 1041-1 of 10-79  
OMB No. 1545-0047  
See instructions to Form 1041-1  
Department of the Treasury

Any information omitted from each itemized disbursement may not be used or used by any person for the purpose of soliciting contributions for commercial purposes, other than taking the name and address of any individual contributor to solicit contributions from such person.

Name of Committee (in full)  
**National Right to Life Political Action Committee**

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date Month, day, year	Amount of Each Disbursement This Period
<b>Ms. Sandra Faucher RFD #6 Augusta, ME 04330</b>	<b>Travel</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>6/14/80</b>	<b>\$ 299.75</b>
<b>Maroon Systems Inc. 11325 Maryland Avenue Beltsville, MD</b>	<b>Computer Costs</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>6/14/80</b>	<b>\$ 25.14</b>
<b>Miss. Citizens Concerned for Life 4603 Nicollet Avenue Minneapolis, MN 55409</b>	<b>List Rental</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>6/23/80</b>	<b>\$2,264.15</b>
<b>Security National Bank 14th and F St., N.W. Washington, D.C. 20045</b>	<b>Bank charges</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>4/80</b> <b>5/80</b>	<b>\$ 16.51</b> <b>\$ 9.30</b>
SUBTOTAL of Disbursements This Page (Section I) .....			
TOTAL This Period (last page (the line number only) .....			<b>\$2,675.31</b>

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April 1980 Q

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1980 April Quarterly  
1-1-80 through 3-31-80

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 1 for  
LIFE RIGHTS  
This schedule is required for each  
category of the Disbursement  
Summary Page

Any information obtained from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of the donor solely for the purpose of soliciting contributions from such contributor.

Name of Committee (in Full)  
**National Right To Life Political Action Committee**

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
<b>BEAMES, BOPP &amp; HAYNES 900 Sycamore Building Terre Haute, Indiana 47807</b>	<b>Legal Work</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <b>administrative</b>	<b>3/20/80</b>	<b>\$669.88</b>
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
J. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
Subtotal			<b>\$669.88</b>
TOTAL This Period			<b>\$669.88</b>

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**National Right to Life Political Action Committee**

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
National Right to Life Committee Suite 341 National Press Bldg. 529 14th Street, N.W. Washington, D.C. 20045	Transfer incorrectly deposited donation	7/1/80	\$ 100.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
National Right to Life Committee Suite 341 National Press Bldg. 529 14th Street, N.W. Washington, D.C. 20045	payroll/administrative expense	6/27/80	1,215.84
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/12/80	613.03
		9/26/80	576.92
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
National Right to Life Committee Suite 341 National Press Bldg. 529 14th Street, N.W. Washington, D.C. 20045	Administrative	9/29/80	35.37
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
National Right to Life Educational Foundation Suite 341 National P B Foundation 529 14th Street, N.W. Washington, D.C. 20045	Purchase of books	9/30/80	69.35
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): see above		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Sandy Faucher R. F. D. #6 Augusta, ME 04330	postage each	8/4/80	100.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): see above	9/24/80	\$1.26
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Right to Life of Central Kentucky 2900 Middlesex Court Lexington, KY 40503	Lease Rental	8/27/80	25.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): see above		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Split Second Copy 911 Hilton Road Belleville, IL 62222	Printing	9/22/80	63.08
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): see above		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
SUE TOTAL of Disbursements This Page (optional)			\$2,917.85
TOTAL This Period (last page this line number only)			\$2,917.85

1980 Twelfth day report  
preceding general election  
10-1-80 through 10-15-80  
ITEMIZED DISBURSEMENTS

CONTROLLED

Also attach statement for  
Statement of Contributions  
Statement of Expenditures

8

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

Name of Committee (in Full)

**NATIONAL RIGHT TO LIFE POLITICAL ACTION COMMITTEE**

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date Disbursed, day, month, year	Amount of Each Disbursement This Period
National Right to Life Comm. Suite 341 National Press Building Washington, DC 20045	Wages for Sandy Faulstich Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General Other (specify): Administrative	10/8/80	\$12.29
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):	Date Disbursed, day, month, year	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):	Date Disbursed, day, month, year	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):	Date Disbursed, day, month, year	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):	Date Disbursed, day, month, year	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):	Date Disbursed, day, month, year	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):	Date Disbursed, day, month, year	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):	Date Disbursed, day, month, year	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):	Date Disbursed, day, month, year	Amount of Each Disbursement This Period
TOTAL of Disbursements This Page (optional)			\$12.29
TOTAL of Disbursements This Period (last page this line number only)			\$12.29

00031721145

84040455171



1980 Thirtieth day report  
Following general election  
10-16-80 through 11-24-80

9

SCHEDULE B

ITEMIZED DISBURSEMENTS

Form 1000-1  
Instructions  
Schedule B-1  
Summary Page

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

Name of Committee (in Full)

National Right to Life Committee Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date Month, day, year	Amount of Each Disbursement This Period
Security National Bank National Press Building 529 14th Street, N.W. Washington, D. C. 20045	Bank charges	10/25/80	141.91
	Disbursement for: <input type="checkbox"/> Salary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): Administrative Expense		
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date Month, day, year	Amount of Each Disbursement This Period
National Right to Life Comm. Suite 341, Nat'l Press Bldg. 529 14th Street, N.W. Washington, D.C. 20045	Wages-S.Faucher	10/25/80	612.29
	Disbursement for: <input type="checkbox"/> Salary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): Administrative Expense		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date Month, day, year	Amount of Each Disbursement This Period
National Right to Life Comm. Suite 341, Nat'l Press Bldg. 529 14th Street, N.W. Washington, D. C. 20045	Wages-S.Faucher	11/7/80	612.29
	Disbursement for: <input type="checkbox"/> Salary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): Administrative Expense		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date Month, day, year	Amount of Each Disbursement This Period
Sandra Faucher LED 66 Augusta, Maine 04330	Petty Cash	10/30/80	10.02
	Disbursement for: <input type="checkbox"/> Salary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): Administrative Expense		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date Month, day, year	Amount of Each Disbursement This Period
National Right to Life Comm. Suite 341, Nat'l Press Bldg. 529 14th Street, N.W. Washington, D.C. 20045	Wages-S.Faucher	11/19/80	612.29
	Disbursement for: <input type="checkbox"/> Salary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): Administrative Expense		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date Month, day, year	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Salary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date Month, day, year	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Salary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date Month, day, year	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Salary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date Month, day, year	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Salary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
TOTAL Disbursements			2,005.40

84040455172

3005121911



10

~~84040455173~~

1980 January Year End  
11-25-80 through 12-31-80

SCHEDULE B

ITEMIZED DISBURSEMENTS

11

Page 1 of 1 for  
EFILE RELEASE # 19  
For signature of filer, filer's  
attorney or the filer's  
authorized agent

Any information copied from such Reports and Statements  
commercial purposes, other than using the name and address

Name of Committee (in Full)

National Right to Life Political Action Committee

A. Full Name, Mailing Address and ZIP Code

National Right to Life Committee  
Suite 341, National Press Bldg.  
529 14th Street, N. W.  
Washington, D.C. 20045

Major  
G. Farber

Administrative  
Expense

12-3-80

612.24

B. Full Name, Mailing Address and ZIP Code

C. Full Name, Mailing Address and ZIP Code

D. Full Name, Mailing Address and ZIP Code

E. Full Name, Mailing Address and ZIP Code

F. Full Name, Mailing Address and ZIP Code

G. Full Name, Mailing Address and ZIP Code

H. Full Name, Mailing Address and ZIP Code

I. Full Name, Mailing Address and ZIP Code

J. TOTAL of Disbursements This Period

TOTAL This Period (fill out this line only if you have more than one page)

612.24

44040455174

310:177.117

1980 January Year End  
11-25-80 Through 12-31-80

SCHEDULE A

ITEMIZED RECEIPTS

Page 1 of 1  
USE NUMBER 12  
See separate instructions for each section of the General Summary Pages

Any information copied from such Reports or Statements may not be used for the purpose of obtaining contributions or for other purposes, other than using the name and address of the donor, to solicit contributions from such contributors.

Name of Committee on File:  
**National Right to Life Political Action Committee**

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date Month, Day, Year	Amount of Each Receipt This Period
<b>National Right to Life Committee Suite 341, National Press Bldg. 529 14th Street, N. W. Washington, D.C. 20045</b>		<b>12-18-80</b>	<b>3,000.00</b>
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <b>Loan repayment</b>			
Address: Year-to-Date: \$			
B. Full Name, Mailing Address and ZIP Code			
Name of Employer			
Date Month, Day, Year			
Amount of Each Receipt This Period			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Address: Year-to-Date: \$			
C. Full Name, Mailing Address and ZIP Code			
Name of Employer			
Date Month, Day, Year			
Amount of Each Receipt This Period			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Address: Year-to-Date: \$			
D. Full Name, Mailing Address and ZIP Code			
Name of Employer			
Date Month, Day, Year			
Amount of Each Receipt This Period			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Address: Year-to-Date: \$			
E. Full Name, Mailing Address and ZIP Code			
Name of Employer			
Date Month, Day, Year			
Amount of Each Receipt This Period			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Address: Year-to-Date: \$			
F. Full Name, Mailing Address and ZIP Code			
Name of Employer			
Date Month, Day, Year			
Amount of Each Receipt This Period			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Address: Year-to-Date: \$			
G. Full Name, Mailing Address and ZIP Code			
Name of Employer			
Date Month, Day, Year			
Amount of Each Receipt This Period			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Address: Year-to-Date: \$			
H. Full Name, Mailing Address and ZIP Code			
Name of Employer			
Date Month, Day, Year			
Amount of Each Receipt This Period			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Address: Year-to-Date: \$			
I. Full Name, Mailing Address and ZIP Code			
Name of Employer			
Date Month, Day, Year			
Amount of Each Receipt This Period			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Address: Year-to-Date: \$			
J. Full Name, Mailing Address and ZIP Code			
Name of Employer			
Date Month, Day, Year			
Amount of Each Receipt This Period			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Address: Year-to-Date: \$			
K. Full Name, Mailing Address and ZIP Code			
Name of Employer			
Date Month, Day, Year			
Amount of Each Receipt This Period			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Address: Year-to-Date: \$			
L. Full Name, Mailing Address and ZIP Code			
Name of Employer			
Date Month, Day, Year			
Amount of Each Receipt This Period			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Address: Year-to-Date: \$			
M. Full Name, Mailing Address and ZIP Code			
Name of Employer			
Date Month, Day, Year			
Amount of Each Receipt This Period			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Address: Year-to-Date: \$			
N. Full Name, Mailing Address and ZIP Code			
Name of Employer			
Date Month, Day, Year			
Amount of Each Receipt This Period			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Address: Year-to-Date: \$			
O. Full Name, Mailing Address and ZIP Code			
Name of Employer			
Date Month, Day, Year			
Amount of Each Receipt This Period			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Address: Year-to-Date: \$			
P. Full Name, Mailing Address and ZIP Code			
Name of Employer			
Date Month, Day, Year			
Amount of Each Receipt This Period			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Address: Year-to-Date: \$			
Q. Full Name, Mailing Address and ZIP Code			
Name of Employer			
Date Month, Day, Year			
Amount of Each Receipt This Period			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Address: Year-to-Date: \$			
R. Full Name, Mailing Address and ZIP Code			
Name of Employer			
Date Month, Day, Year			
Amount of Each Receipt This Period			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Address: Year-to-Date: \$			
S. Full Name, Mailing Address and ZIP Code			
Name of Employer			
Date Month, Day, Year			
Amount of Each Receipt This Period			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Address: Year-to-Date: \$			
T. Full Name, Mailing Address and ZIP Code			
Name of Employer			
Date Month, Day, Year			
Amount of Each Receipt This Period			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Address: Year-to-Date: \$			
U. Full Name, Mailing Address and ZIP Code			
Name of Employer			
Date Month, Day, Year			
Amount of Each Receipt This Period			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Address: Year-to-Date: \$			
V. Full Name, Mailing Address and ZIP Code			
Name of Employer			
Date Month, Day, Year			
Amount of Each Receipt This Period			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Address: Year-to-Date: \$			
W. Full Name, Mailing Address and ZIP Code			
Name of Employer			
Date Month, Day, Year			
Amount of Each Receipt This Period			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Address: Year-to-Date: \$			
X. Full Name, Mailing Address and ZIP Code			
Name of Employer			
Date Month, Day, Year			
Amount of Each Receipt This Period			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Address: Year-to-Date: \$			
Y. Full Name, Mailing Address and ZIP Code			
Name of Employer			
Date Month, Day, Year			
Amount of Each Receipt This Period			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Address: Year-to-Date: \$			
Z. Full Name, Mailing Address and ZIP Code			
Name of Employer			
Date Month, Day, Year			
Amount of Each Receipt This Period			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Address: Year-to-Date: \$			
TOTAL This Period (Add Each Receipt This Period)			
3,000.00			

4040455173

3177777777

## LOANS

LINE NUMBER 3  
GIVE NUMBER OF HOUSE  
FOR EACH HOUSEHOLD

13

~~8-4-040455176~~



Amended  
1980 January Year End  
11-25-80 Through 12-31-80

**SCHEDULE A**

**ITEMIZED RECEIPTS**

121

Page 1 of 1  
LINE NUMBER 15  
(Use separate schedules for each category of the Detailed Summary Page)

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

Name of Committee (in Full)

**National Right to Life Political Action Committee**

A. Full Name, Mailing Address and ZIP Code

**National Right to Life Committee  
Suite 341, National Press Bldg.  
529 14th Street, N.W.  
Washington, D. C. 20045**

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

Occupation

12-18-80

3,000.00

Receipt For ☐ Primary ☐ General  
Other (specify): **Repayment of administrative expense**

Aggregate Year-to-Date - \$ **4,159.28**

B. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

Occupation

Receipt For ☐ Primary ☐ General  
☐ Other (specify):

Aggregate Year-to-Date - \$

C. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

Occupation

Receipt For ☐ Primary ☐ General  
☐ Other (specify):

Aggregate Year-to-Date - \$

D. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

Occupation

Receipt For ☐ Primary ☐ General  
☐ Other (specify):

Aggregate Year-to-Date - \$

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

Occupation

Receipt For ☐ Primary ☐ General  
☐ Other (specify):

Aggregate Year-to-Date - \$

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

Occupation

Receipt For ☐ Primary ☐ General  
☐ Other (specify):

Aggregate Year-to-Date - \$

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

Occupation

Receipt For ☐ Primary ☐ General  
☐ Other (specify):

Aggregate Year-to-Date - \$

TOTAL of Receipts This Page (optional)

TOTAL This Period (list page this line number only)

3,000.00

04040455177

**Amendment**  
**1980 January Year End**  
**11-25-80 through 12-31-80**

**SCHEDULE C**  
 (Revised 3/80)

**LOANS**

Page 1 of 1 to  
 Line Number 9  
 Use separate schedule  
 for each numbered line

(15)

Name of Committee (in Full) <b>National Right to Life Political Action Committee</b>			
A. Full Name, Mailing Address and ZIP Code of Loan Source <b>National Right to Life Committee Suite 341, National Press Building 529 14th Street, N. W. Washington, D. C. 20045</b>		Original Amount of Loan <b>9,000.00</b>	Balance Outstanding Close of This Period <b>9,000</b>
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)		Cumulative Payments To Date <b>0.00</b>	
Terms: Date Incurred <b>10-16-80</b> Date Due <b>N/A</b> Interest Rate <b>0 % (april)</b>		<input type="checkbox"/> Secured	
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
B. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Balance Outstanding Close of This Period
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)		Cumulative Payments To Date	
Terms: Date Incurred Date Due Interest Rate % (april)		<input type="checkbox"/> Secured	
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
<b>SUBTOTALS This Period This Page (optional)</b>			
<b>TOTALS This Period (last page in this line only)</b>			

9,000.

784040455178

1980 Thirtieth day report  
 (Following general election)  
 in Michigan  
 1-1-81 through 5-11-81

Page 1 of 1 for  
 LINE NUMBER 19  
 (Use separate schedules for each  
 category of the Detailed  
 Summary Page)

SCHEDULE B

ITEMIZED DISBURSEMENTS

16

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

Name of Committee (in Full)

National Right to Life Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
National Right to Life Comm. Suite 341, National Press Bldg. 529 14th Street, N. W. Washington, D. C. 20045	Wages-S. Faucher Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Adm. Exp.	1-15-81	666.56
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
National Right to Life Comm. Suite 341, National Press Bldg. 529 14th Street, N. W. Washington, D. C. 20045	Wages-S. Faucher Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Adm. Exp.	1-29-81	666.56
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Sandy Faucher R.F.D. #6 Augusta, ME 04330	Postage Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Adm. Exp.	2-11-81	97.34
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
National Right to Life Comm. Suite 341, National Press Bldg. 529 14th Street, N. W. Washington, D. C. 20045	Wages-S. Faucher Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Adm. Exp.	2-12-81	666.56
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
National Right to Life Comm. Suite 341, National Press Bldg. 529 14th Street, N. W. Washington, D. C. 20045	Wages-S. Faucher Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Adm. Exp.	2-26-81	666.56
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
National Right to Life Comm. Suite 341, National Press Bldg. 529 14th Street, N. W. Washington, D. C. 20045	Wages-S. Faucher Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Adm. Exp.	3-30-81	1,333.12
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
National Right to Life Comm. Suite 341, National Press Bldg. 529 14th Street, N. W. Washington, D. C. 20045	Wages-S. Faucher Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Adm. Exp.	4-29-81	1,333.12
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

5,429.82

931031231029



**SCHEDULE A**

1980 Michigan day report following  
general election in Michigan  
ITEMIZED RECEIPTS  
1-1-81 through 5-11-81

Page 1 of 1 for  
LINE NUMBER 15  
(Use separate schedule for each  
category of the Detailed  
Summary Page)

(17)

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

Name of Committee (in Full)

**National Right to Life Political Action Committee**

A. Full Name, Mailing Address and ZIP Code

**National Right to Life Committee  
Suite 341, National Press Bldg.  
529 14th Street, N. W.  
Washington, D. C. 20045**

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt this Period

Occupation

2-27-81

6,000.00

Receipt For:

☐ Primary

☐ General

X Other (specify):

Repayment of adminis-  
trative expenses

Aggregate Year-to-Date-\$ 6,000.00

B. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

Occupation

Receipt For:

☐ Primary

☐ General

☐ Other (specify):

Aggregate Year-to-Date-\$

C. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

Occupation

Receipt For:

☐ Primary

☐ General

☐ Other (specify):

Aggregate Year-to-Date-\$

D. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

Occupation

Receipt For:

☐ Primary

☐ General

☐ Other (specify):

Aggregate Year-to-Date-\$

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

Occupation

Receipt For:

☐ Primary

☐ General

☐ Other (specify):

Aggregate Year-to-Date-\$

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

Occupation

Receipt For:

☐ Primary

☐ General

☐ Other (specify):

Aggregate Year-to-Date-\$

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

Occupation

Receipt For:

☐ Primary

☐ General

☐ Other (specify):

Aggregate Year-to-Date-\$

SUBTOTAL of Receipts This Page (optional) . . . . .

TOTAL This Period (last page this line number only) . . . . .

6,000.00

3173193420



1980 Thirtieth day report following  
general election in Michigan  
LOANS  
1-1-81 Through 5-11-81

<b>Name of Committee (in Full)</b> National Right to Life Political Action Committee			
<b>A. Full Name, Mailing Address and ZIP Code of Loan Source</b> National Right to Life Committee Suite 341, National Press Building 529 14th Street, N. W. Washington, D. C. 20045 Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):		<b>Original Amount of Loan</b>  9,000.00	<b>Cumulative Payment To Date</b>  0.00
		<b>Balance Outstanding at Close of This Period</b>  9,000.00	
<b>Terms:</b> Date Incurred <u>10-16-80</u> Date Due <u>N/A</u> Interest Rate <u>0</u> % (apr) <input type="checkbox"/> Secured			
<b>List All Endorsers or Guarantors (if any) to Item A</b>			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
<b>B. Full Name, Mailing Address and ZIP Code of Loan Source</b>		<b>Original Amount of Loan</b>	<b>Cumulative Payment To Date</b>
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
<b>Terms:</b> Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) <input type="checkbox"/> Secured			
<b>List All Endorsers or Guarantors (if any) to Item B</b>			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
<b>SUBTOTALS This Period This Page (optional)</b> .....			
<b>TOTALS This Period (last page in this line only)</b> .....			9,000.00

84040455181

## SCHEDULE B :

## ITEMIZED DISBURSEMENTS

Page 1 of 1 for  
 LINE NUMBER 19  
 (file separate schedule) for each  
 category of the Detailed  
 Summary Page)

July 31 Midyear Report  
 5-12-81 through 7-31-81 1981

(19)

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

Name of Committee (in Full)

National Right to Life Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
National Right to Life Comm. Suite 341, Nat'l Press Bldg. 529 14th Street, N. W. Washington, D. C. 20045	Wages-S. Faucher Disbursement for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Administrative expense	5-29-81	1,333.12
B. Full Name, Mailing Address and ZIP Code National Right to Life Comm. Suite 341, Nat'l Press Bldg. 529 14th Street, N. W. Washington, D. C. 20045	Wages-S. Faucher Disbursement for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Administrative expense	6-29-81	1,333.12
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			2,666.24

81011790  
 4040155182

**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

Page 1 of 1 for  
LINE NUMBER 19  
(Use separate schedule(s) for each  
category of the Detailed  
Summary Page)

7-1-81 through 12-31-81 January 31 Year Ended 20 Report 1981

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

Name of Committee (in Full)

**National Right to Life Political Action Committee**

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
National Right to Life Committee 419 7th St., N.W., Suite 402 Washington, DC 20004	Wages-Sandra Faucher	9-29-81	1,333.12
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General	10-29-81	666.56
	<input checked="" type="checkbox"/> Other (specify): Administrative	11-30-81	2,666.24
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Expense		
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify):		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify):		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify):		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify):		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify):		
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			4,665.92

84833153679



**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

Page 1 of 1 for  
 LINE NUMBER 19  
 (Use separate schedule for each  
 category of the Detailed  
 Summary Page)

7-1-82 through 9-30-82 October 15 Quarterly Report 1982 (21)

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

Name of Committee (In Full)

National Right to Life Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Riggs National Bank P. O. Box 1912 Washington, DC 20074	Bank charges	7-30-82	54.39
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Administrative	7-30-82	28.46
B. Full Name, Mailing Address and ZIP Code  Internal Revenue Service Washington, DC	Purpose of Disbursement Taxes	7-12-82	2,291.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Administrative		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
SUBTOTAL of Disbursements This Page (optional) .....			
TOTAL This Period (last page this line number only) .....			2,373.85

442845686



## SCHEDULE B

## ITEMIZED DISBURSEMENTS

Page 1 of 1 for  
LINE NUMBER 10  
(Use separate schedule(s) for each  
category of the Detailed  
Summary Page)

11-23-82 through 12-31-82 January 31 Year End Report 1982 (22)

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

Name of Committee (in Full)

National Right to Life Political Action Committee.

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Riggs National Bank 318 7th Street, N.W. Washington, DC 20004	Bank charges	11-30-82	7.60
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Administrative	12-31-82	294.60
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			302.20

63032518  
840404518



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

January 11, 1983

James Bopp, Jr.  
BRAMES, BOPP & HAYNES  
900 Sycamore Building  
19 South Sixth Street  
Terre Haute, Indiana 47807

Re: MUR 1412

Dear Mr. Bopp:

On January 10, 1983, the Commission granted your clients, National Right to Life Political Action Committee and National Right to Life, Inc. an extension of time in which to answer the interrogatories. Therefore, the interrogatories are now due on January 14, 1983. If you have any questions, please call Deborah Curry, the attorney assigned to this matter at (202)523-4000.

Sincerely,

Charles N. Steele  
General Counsel

BY:

A handwritten signature in cursive script, appearing to read "Kenneth A. Gross", is written over the typed name.

Kenneth A. Gross  
Associate General Counsel

84040155186

ARNOLD H. BRAMES  
JAMES BOPP, JR.  
DAVID S. HAYNES

BRAMES, BOPP & HAYNES  
ATTORNEYS AT LAW  
ONE EIGHTYONE BUILDING  
N. 1000 S. 10TH STREET  
TERRE HAUTE, INDIANA 47807-5567

January 14, 1983

RECEIVED BY THE FEC  
JAN 20 1983  
ALL: 07

Ms. Deborah Curry, Esq.  
Federal Election Commission  
1325 K Street, N.W.  
Washington, DC 20463

Re: MUR 1412

Dear Ms. Curry:

Enclosed herewith are our Answers to Interrogatories previously submitted by you.

I regret the delay we have had in this matter. As you know, I suffered a retina detachment for which I have spent several weeks in the hospital and several additional weeks recuperating. I am just now at the point where I can read.

If you have any questions regarding these Answers, please let me know.

Sincerely,

BRAMES, BOPP & HAYNES

James Bopp, Jr.

JB:maw  
Enclosure

84040455187



ANSWERS TO INTERROGATORIES

MUR 1412

- 84040455188
1. a. The National Right to Life Political Action Committee has paid on its own behalf administrative expenses in the total amount of \$14,274.76 as of March 24, 1981. These administrative expenses were reported on the appropriate forms filed with the Federal Election Commission. The first such administrative expense was on March 20, 1980. This expense was listed on the first quarterly report for 1980 filed with the Federal Election Commission and was in the amount of \$669.88. In the second quarterly report for 1980, the PAC incurred administrative expenses in the amount of \$2,675.31 for a total of \$3,345.19 for the first six months of 1980. On July 31, 1980, the National Right to Life Committee reimbursed part of these administrative expenses which is the receipt in question.  
b. These administrative expenditures were not paid for directly by NRLC because they were in debt.  
c. No.
  2. a. NRLPAC did make a loan of \$9,000.00 to NRLC on October 16, 1980. There are no loan instruments.  
b. No.
  3. a. The June 2, 1981, NRLPAC year end amendment shows a change from a loan repayment to a \$3,000.00 payment for reimbursement of administrative expenses. This change occurred due to an inquiry from Mark Kleinman of the Reports Analysis Division of the Federal Election Commission who indicated to us that NRLC may not make a loan repayment unless that money had been segregated when collected by NRLC and paid to the PAC from this separate account. There, however, was no such requirement indicated to us for the reimbursement of administrative expenses. Attached hereto is the May 19, 1981, letter to Mr. Kleinman reflecting this transaction.  
b. By May 19, 1981, NRLPAC had reported to the Federal Election Commission that it had expended \$14,174.76 for administrative expenses. The \$3,000.00 reimbursement was in addition to the \$1,940.45 previously reported as a reimbursement.
  4. a. See answer to 3.b.



4. b. The National Right to Life Committee was in debt when the decision was made for the PAC to advance certain administrative expenses. The \$14,174.76 in administrative expenses was therefore accumulated by the PAC. Later NRLC decided to directly pay these administrative expenses when they were incurred.

c. No.

84040455189

**BRAMES, BOPP & HAYNES**

ATTORNEYS AT LAW

800 SYCAMORE BUILDING

18 SOUTH SIXTH STREET

TERRE HAUTE, INDIANA 47807

ARNOLD H. BRAMES  
JAMES BOPP, JR.  
DAVID G. HAYNES

TELEPHONE  
(317) 238-2421

May 19, 1981

Mr. Mark Kleinman, Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
1325 K Street, N. W.  
Washington, D. C. 20463

Re: Your Letters of April 30, 1981

Dear Mr. Kleinman:

As General Counsel for the National Right to Life Political Action Committee, your letters of April 30, 1981, have been referred to me for response.

With respect to each:

1. Enclosed is an amendment to our year end report reflecting the fact that, as we discussed, we are changing our record to reflect the fact that the \$3,000.00 payment from NRLC to NRLPAC was reimbursement of administrative expenses, not a loan repayment as we previously reported. In addition, you will note on our May 11, 1981, report, NRLC has again paid the PAC \$6,000.00 as a repayment of administrative expenses. Total payments to date by NRLC to the PAC to reimburse it for administrative expenses amount to \$10,159.28. To date NRLPAC has expended \$14,174.76 for administrative expenses. The great bulk of it is now repaid.

In addition, the loan of \$9,000.00 to NRLC is still reflected on our books. When it becomes desirable for us to repay this loan, we will establish, as a result of your suggestions, a separate bank account into which only contributions to NRLC from individuals will be placed. From this account, the loan will be repaid.

2. With respect to our 12 day pre-general election report and 30 day post-general election reports, we have included herewith an amendment reflecting the total amount of itemized contributions we received during that period.

If you have any questions regarding this matter, please contact me at the above address.

Sincerely,

BRAMES, BOPP & HAYNES

James Bopp, Jr.

JB:maw

84040455190

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR 1412  
National Right to Life )  
Political Action Committee )  
National Right to Life )  
Committee, Inc. )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 10, 1983, the Commission decided by a vote of 5-0 to take the following actions in MUR 1412:

1. Grant an extension of time to answer interrogatories to National Right to Life Political Action Committee/ National Right to Life Committee, Inc. until January 14, 1983.
2. Approve the letter as attached to the General Counsel's Report signed January 5, 1983.

Commissioners Aikens, Elliott, Harris, McGarry and Reiche voted affirmatively in this matter; Commissioner McDonald did not cast a vote.

Attest:

1-10-83

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary:  
Circulated on 48 hour tally basis:

1-5-83, 5:07  
1-6-83, 11:00

84040455191



BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

83 JAN 5 P 5: 07

In the Matter of

National Right to Life  
Political Action Committee/  
National Right to Life  
Committee, Inc.

NUR 1412

**SENSITIVE**

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

On September 29, 1982, the Commission found reason to believe the National Right to Life Political Action Committee and the National Right to Life Committee, Inc. violated 2 U.S.C. § 441b. The Commission also authorized the sending of interrogatories to the respondents in this matter.

On October 4, 1982 the Office of General Counsel sent the letter and interrogatories to respondents. On October 14, 1982 the letter and enclosed interrogatories were returned by the postal service. The postal markings stated "moved left no address." Further inquiry led to a new address and telephone number in Washington, D.C. for both the Committee and the PAC. On October 15, 1982, the Office of General Counsel remailed the letter and interrogatories to respondents.

On November 1, 1982 the Office of General Counsel received a letter from counsel for respondents (James Bopp). In that letter counsel for respondent stated the need for further time since he

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had just received the interrogatories from the respondents. Counsel requested and was granted an extension of time to answer the interrogatories until November 29, 1982.

On November 30, 1982, the Office was notified by counsel's secretary that there would be a delay in the answer. The secretary stated that respondent would be having surgery the following day on a detached retina. In further telephone conversations, the secretary stated that a explanatory letter from one of the partners would be forthcoming.

On December 8, 1982 the Office of General Counsel received a letter from David Haynes a partner of James Bopp. The letter, written on behalf of James Bopp, stated that Mr. Bopp had experienced eye problems for approximatley two weeks. Additionally, the letter stated that the problem was diagnosed as a torn retina which required surgery on December 1, 1982. According to the affidavit attached to the letter Mr. Bopp is General Counsel for the Committee and handles all the legal work for the Committee and PAC exclusively. The letter requested an additional forty-five days until January 14, 1983 in which to answer the interrogatories.

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## II. RECOMMENDATION

1. Grant an extension of time to answer interrogatories to National Right to Life Political Action Committee/National Right to Life Committee, Inc. until January 14, 1982.
2. Approve attached letter.

Charles W. Steele  
General Counsel

January 5, 1983  
Date

BY:

Kenneth A. Gross - by ST  
Kenneth A. Gross  
Associate General Counsel

Attachment  
Letter to Respondents (page 1)

84040455194



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

①  
*Attachment*

James Bopp, Jr.  
BRAMES, BOPP & HAYNES  
900 Sycamore Building  
19 South Sixth Street  
Terre Haute, Indiana 47807

Re: MUR 1412

Dear Mr. Bopp:

On January , 1983, the Commission granted your clients, National Right to Life Political Action Committee and National Right to Life, Inc., an extension of time in which to answer the interrogatories. Therefore, the interrogatories are now due on January 14, 1983. If you have any questions, please call Deborah Curry, the attorney assigned to this matter at (202)523-4000.

Sincerely,

Charles N. Steele  
General Counsel

84040155195

84040455196



AUG 30 1983

IND



*from*

**BRAMES, BOPP & HAYNES**  
ATTORNEYS AT LAW  
900 SYCAMORE BUILDING  
19 SOUTH SIXTH STREET  
TERRE HAUTE, INDIANA 47807

*To*

Mr. Gary Johansen  
Federal Election Commission  
1325 K Street, N.W.  
Washington, DC 20463



840404551  
JAMES, BOPP & HAYNES  
ATTORNEYS AT LAW  
800 SYCAMORE BUILDING  
10 SOUTH SIXTH STREET  
TERRE HAUTE, INDIANA 47807



Ms. Deborah Curry, Esq.  
Federal Election Commission  
1325 K Street, N.W.  
Washington, DC 20463

ARNOLD H. BRAMES  
JAMES BOPP, JR.  
DAVID D. HAYNES

BRAMES, BOPP & HAYNES  
ATTORNEYS AT LAW  
800 SYCAMORE BUILDING  
18 SOUTH SIXTH STREET  
TERRE HAUTE, INDIANA 47807

December 3, 1982

RECEIVED  
Catt 7064  
82 DEC 8 P12:40

TELEPHONE  
(812) 232-2421  
82 DEC 8 P2:40

CERTIFIED MAIL

Ms. Deborah Curry  
Federal Election Commission  
1325 K Street, N.W.  
Washington, DC 20463

Re: MUR 1412

Dear Ms. Curry:

I am writing this letter on behalf of my law partner, James Bopp, Jr. For a period of approximately two weeks, Jim has experienced problems with his left eye. The problem was later diagnosed as a torn retina requiring surgery on Wednesday, December 1, 1982, at Barnes Hospital in St. Louis, Missouri.

This letter is being written to request an additional forty-five days to and including January 14, 1983, within which to answer the Interrogatories submitted with your letter of October 4. My affidavit in support of this request is enclosed.

If you have any questions, please feel free to call or write.

Sincerely,

BRAMES, BOPP & HAYNES

*David D. Haynes*  
David D. Haynes

DDH:maw  
Enclosure  
cc: John C. Willke, M.D.  
Sandra Faucher  
Philip Moran  
Warren Sweeney

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STATE OF INDIANA) )SS:  
COUNTY OF VIGO )

**AFFIDAVIT**

David D. Haynes, having been first duly sworn upon his oath, makes this affidavit in support of his request on behalf of James Bopp, Jr. and National Right to Life Committee, Inc. for additional time within which to answer Interrogatories:

1. Affiant is a law partner of the law firm of Brames, Bopp & Haynes of which James Bopp, Jr. is a partner.
2. James Bopp, Jr. is General Counsel for the National Right to Life Committee, Inc. and handles all National Right to Life Committee, Inc. legal work exclusively.
3. James Bopp, Jr. has undergone surgery to correct a torn retina in his left eye and preventive surgery on his right eye at Barnes Hospital in St. Louis, Missouri. The surgery and treatment will require a recuperative period of approximately six (6) weeks.
4. Due to the nature of the complaint herein and James Bopp, Jr.'s exclusive relationship with National Right to Life Committee, Inc., it is mandatory that he handle this matter and the Answers to Interrogatories personally.

Further affiant saith not.

David D. Haynes  
David D. Haynes

Subscribed and sworn to before me, a Notary Public, this 3rd day of December, 1982.

My Commission Expires  
December 14, 1984

Mary A. Winn, Notary Public  
County of Residence: Clay

4015200  
BRAMES, BOPP & HAYNES  
ATTORNEYS AT LAW  
900 SYCAMORE BUILDING  
19 SOUTH SIXTH STREET  
TERRE HAUTE, INDIANA 47807

CERTIFIED

P14 7097017

MAIL

Ms. Deborah Curry  
Federal Election Commission  
1325 K Street, N.W.  
Washington, DC 20463







FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 12, 1982

James Bopp, Jr.  
Branes, Bopp & Haynes  
900 Sycamore Building  
19 South Sixth Street  
Terre Haute, Indiana 47807

Re: MUR 1412

Dear Mr. Bopp:

Per your request, you have been granted a thirty day extension of time in which to have your clients answer the interrogatories. Therefore, the due date of the answer is on or before November 29, 1982.

Sincerely,

Charles N. Steele  
General Counsel

BY:

A handwritten signature in dark ink, appearing to read "Kenneth A. Gross", is written over the typed name.

Kenneth A. Gross  
Associate General Counsel

84040455201

ARNOLD H. BRAMES  
JAMES BOPP, JR.  
DAVID D. HAYNES

BRAMES, BOPP & HAYNES  
ATTORNEYS AT LAW  
800 SYCAMORE BUILDING  
18 SOUTH SIXTH STREET  
TERRE HAUTE, INDIANA 47807

October 28, 1982

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TELEPHONE  
812 230-4281

GENERAL COUNSEL

Ms. Deborah Curry  
Federal Election Commission  
1325 K Street, N.W.  
Washington, DC 20463

Re: MUR 1412

Dear Ms. Curry:

Please be advised that I am General Counsel for the National Right to Life Committee, Inc. and that I represent them in the above-entitled matter.

The information regarding this matter has just been sent to me and I will require an additional thirty (30) days in which to answer the Interrogatories you have propounded to us. Our answer should be in your hands on or before November 29, 1982. Please advise me if this is satisfactory.

Thank you for your cooperation in this matter.

Sincerely,

BRAMES, BOPP & HAYNES

*J Bopp*  
James Bopp, Jr.

JB:maw

cc: John C. Willke, M.D.  
Sandra Faucher  
Philip Moran  
Warren Sweeney

84040455202

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IS, BOPP & HAYNES

ATTORNEYS AT LAW

300 SYCAMORE BUILDING

100 SOUTH SIXTH STREET

HAUTE, INDIANA 47807-3587



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Ms. Deborah Curry  
Federal Election Commission  
1325 K Street, N.W.  
Washington, DC 20463

REC  
OFFICE

STATEMENT OF DESIGNATION OF COUNSEL

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RECEIVED  
OFFICE OF THE  
GENERAL COUNSEL

NAME OF COUNSEL: James Bopp, Jr., BRAMES, BOPP & HAYNES  
ADDRESS: 900 Sycamore Building, 19 South 6th Street  
Terre Haute, IN 47807  
TELEPHONE: 812-238-2421

The above-named individual is hereby designated as my  
counsel and is authorized to receive any notifications and  
other communications from the Commission and to act on my  
behalf before the Commission.

Date

10-22-82

Signature John C. Willke, M. D.

NAME: John C. Willke, M.D., President, National Right to Life  
Committee, Inc.  
ADDRESS: 7634 Pineglenn Drive, Cincinnati, OH 45224

HOME PHONE: 513-522-7982

BUSINESS PHONE: 202-638-4396

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7634 Pineglan Drive  
Cincinnati, OH 45224

8404045520



HELP GOODWILL INDUSTRIES  
HELP THE HANDICAPPED

Mr. Frank P. Reiche  
Chairman for the FEC  
Federal Election Commission  
1325 K Street, N.W.  
Washington, DC 20463

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POSTAGE WILL BE PAID BY ADDRESSEE



FROM: WA 4 14TH ST. D. C.  
MOVED, LEFT NO ADDRESS

*Comm. Rec.*

National Right to Life Committee,  
Inc.  
529 14th Street, N.W. Suite 341  
Washington, D.C. 20045

ELECTION COMMISSION  
WASHINGTON, D.C. 20463

OFFICIAL BUSINESS  
PENALTY FOR PRIVATE USE, \$300



*Commissioner  
Sanchez*

Mr. John Stanton, Treasurer  
National Right to Life Political  
Action Committee  
529 14th Street, N.W. Suite 341  
Washington, D.C. 20045



**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

October 4, 1982

John Stanton, Treasurer  
National Right to Life Political  
Action Committee  
529 14th Street, N.W., Suite 341  
Washington, D.C. 20045

Re: MUR 1412

Dear Mr. Stanton:

On September 29, 1982, the Federal Election Commission determined that there is reason to believe that your committee, National Right to Life Political Action Committee, violated 2 U.S.C. § 441b a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") by accepting a corporate contribution. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Additionally, please submit answers to the enclosed questions within ten days of your receipt of this letter.

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

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

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John Stanton  
Page Two

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Deborah Curry, the attorney assigned to this matter, at (202)523-4000.

Sincerely,

*Frank P. Reiche*

Frank P. Reiche  
Chairman for the  
Federal Election Commission

Enclosures

1. Interrogatories
2. General Counsel's Factual and Legal Analysis
3. Procedures
4. Designation of Counsel Statement

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# INTERROGATORIES

MUR 1412

1. On the October Quarterly Report (1980) National Right to Life Political Action Committee (hereinafter "NRLPAC") lists a receipt of \$1,159 from National Right to Life Committee, Inc. (hereinafter "NRLC") for reimbursement of administrative expenses.

a. List all administrative expenses covered by the \$1,159 reimbursement: include to whom paid, purpose of the administrative expense, amount and date.

b. Please explain why each of these administrative expenses was not paid for directly by NRLC.

c. Was the reimbursement of \$1,159 placed in a bank account independent of voluntary contribution account. If yes, submit evidence of this.

2. NRLPAC's Year End Report (1980) disclosed initially a loan repayment of \$3,000 by NRLC for a simultaneously reported NRLPAC loan to NRLC of \$9,000.

a. Did NRLPAC make a loan of \$9,000 to NRLC on October 16, 1980? If yes, include loan instruments.

b. Has the loan in question been repaid by NRLC?

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3. On June 2, 1982 NRLPAC's Year End Amendment effected a change of the loan repayment (\$3,000) to a \$3,000 payment for reimbursement of administrative expenses.

a. Please explain the reason why this change occurred.

b. List all administrative expenses covered by the \$3,000 reimbursement: include to whom paid, purpose of the administrative expense, amount and date.

4. NRLPAC's 30 Day Run Off Report indicates that NRLPAC received an additional \$6,000 payment from NRLC for reimbursement of administrative expenses.

a. List all administrative expenses covered by the \$6,000 reimbursement: include to whom paid, purpose of the administrative expense, amount and date.

b. Please explain why each of these administrative expenses was not paid for directly by NRLC.

c. Was the reimbursement of \$6,000 placed in a bank account independent of the voluntary contribution account? If yes, submit evidence of this.

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**FEDERAL ELECTION COMMISSION  
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS**

**MUR 1412  
STAFF MEMBER(S) & TEL. NO.  
Deborah Curry (202) 523-4000**

**RESPONDENT:** National Right to Life Political Action  
Committee/National Right to Life Committee, Inc.

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

**SUMMARY OF ALLEGATIONS**

8 4 0 4 0 4 5 5 2 1 2  
This matter was generated by the Reports Analysis Division (hereinafter "RAD"), after its analysis of the disclosure reports of the National Right to Life Political Action Committee (hereinafter "NRLPAC"). RAD noted during review of several of NRLPAC's Reports of Receipts and Expenditures, that NRLPAC received funds from its connected organization National Right to Life Committee, Inc. (hereinafter "NRLC") possibly constituting a violation of the Federal Election Campaign Act of 1971, as amended (hereinafter the "Act").

**FACTUAL BASIS AND LEGAL ANALYSIS**

**A. October Quarterly Report**

RAD's review of the October Quarterly Report (1980) disclosed a receipt of \$1,159 by NRLPAC from its connected organization NRLC. This entry was described as a "Reimbursement of Administrative Expenses". A Request for Additional Information (hereinafter "RFAI") was sent on March 10, 1981.



On March 27, 1981 counsel for NRLPAC responded by stating that the Act "authorized a connected organization to reimburse its separate segregated fund for administrative expenses paid by the PAC." 1/ In that response, NRLPAC cites three Advisory Opinions (hereinafter "AO") in support of this contention. 2/ Therefore, NRLPAC refused to refund any of the funds to its connected organization.

B. Year End Report

RAD's review of NRLPAC's Year End Report (1980) disclosed a loan repayment of \$3,000 from its connected organization NRLC. NRLPAC had reported a \$9,000 loan to its connected organization, NRLC. An RFAI was sent on April 30, 1981 and a second notice was sent on May 22, 1981 for failure to respond. On May 27, 1981, counsel for NRLPAC called and was advised by RAD that the loan repayment had to be from permissible sources. At that point, counsel for NRLPAC stated that he would simply change the entry to "reimbursement for administrative expenses."

---

1/ NRLPAC stated that "the administrative expenses reimbursed included legal work for the PAC, computer costs, list rental and bank charges.

2/ NRLPAC relies on AOR 1976-111, AO 1979-33, and AO 1979-72. NRLPAC contends that since NRLC could have paid these administrative costs directly, under the authority of these advisory opinions, NRLPAC may be reimbursed for these expenses. The Office of General Counsel in evaluating the AOs relied on by NRLPAC, found that each concerned itself with a situation in which an apparent 'mistake' had been made and in which the original payment by the committees [separate segregated funds] involved was inadvertent. There is no indication of inadvertence on the part of NRLPAC, therefore its reliance on the advisory opinions in its response is misplaced.

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On June 2, 1982 NRLPAC submitted a Year-End Amendment (1980) that effected the change of the loan repayment to a payment for reimbursement of administrative expenses. That Year-End Amendment disclosed a receipt of \$3,000 from the connected organization NRLC for reimbursement of administrative expenses.

C. Interim Communications

On July 24, 1982, letters were sent out by RAD with regard to the October Quarterly Report, discussed supra and the Year-End amendment, discussed supra. In both cases it was requested that NRLPAC refund these monies. To date there has been no refund of these monies.

On August 13, 1982 NRLPAC responded to these letters reiterating its position that in light of the previously mentioned AOs, there was no violation. Furthermore, NRLPAC asserts that "[t]here is no requirement that the corporation must either pay the administrative expenses directly or [that] such monies must be segregated into an account separate from the contributions account."

D. 30 Day Run Off Report

Finally, on May 19, 1982, the Office of General Counsel received an update from RAD relating to NRLPAC's 30 Day Run Off Report. The 30 Day Run Off Report for 1981 (01/01/81 to 05/11/81) disclosed an additional receipt for \$6,000 by NRLPAC from NRLC. This payment is described as a "repayment of administrative expenses." Therefore, the receipt by NRLPAC of \$3,000 from NRLC in its Year-End Amendment (1980) plus this

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additional receipt of \$6,000 in the 30 Day Run Off Report equals the total amount of the loan NRLC originally reported in the Year End Report (1980).

## II. LEGAL ANALYSIS

2 U.S.C. § 441b(a) expressly prohibits corporate contributions or expenditures in connection with federal elections. See also 11 C.F.R. § 114.2(b). Similarly, 2 U.S.C. § 441b(a) prohibits the acceptance of such prohibited contributions. 2 U.S.C. § 441b(a)(2) elaborates on the meaning of contribution or expenditure stating:

(2) for purposes of this section and section 79L(h) of Title 15, the term "contribution or expenditure" shall include any direct or indirect payment, distribution, loan, advance, deposit, or gift of money, or any services, or anything of value ... to any candidate, campaign committee, or political party or organization, in connection with any of the offices referred to in this section, ....

(emphasis added).

While 2 U.S.C. § 441b expressly forbids corporate contributions and the acceptance of such contributions in connection with a federal election it does provide for exceptions to this broad prohibition. 2 U.S.C. § 441b(2)(c) provides an exemption for corporate funds used in the establishment, administration, and solicitation of contributions to a separate segregated fund of the corporation. These monies are not considered contributions or expenditures under the Act.

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§ 11 C.F.R. § 114.1(a)(2)(iii). However, this exemption for establishment, administration and solicitation costs may not be used as a means to exchange treasury monies for voluntary contributions to a separate segregated fund. 11 C.F.R. § 114.5(b).

Therefore, establishment, administrative, and solicitation costs must be paid for directly by the corporation. Subsequent reimbursement by the corporation (NRLC) to its separate segregated fund (NRLPAC) would constitute a violation of 2 U.S.C. § 441b. Additionally, any direct or indirect payment (loan repayment) made by NRLC to NRLPAC would also constitute a violation of 2 U.S.C. § 441b.

Here, we have an initial transaction that was characterized as a reimbursement of administrative expenses. Then we have a later transaction that was characterized as a loan repayment which was subsequently changed to a reimbursement of administrative expenses with repayments noted as such.

Whether or not these transactions are characterized as reimbursements of administrative expenses or loan repayments, they would still be in violation of 2 U.S.C. § 441b.

Therefore, the Office of General Counsel recommends that the Commission find reason to believe that the National Right to Life Political Action Committee and the National Right to Life Committee, Inc. violated 2 U.S.C. § 441b.

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**III. RECOMMENDATION**

Find reason to believe that the National Right to Life Political Action Committee and National Right to Life Committee, Inc. violated 2 U.S.C. § 441b.

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

October 4, 1982

National Right to Life Committee, Inc.  
529 14th Street, N.W.  
Suite 341  
Washington, D.C. 20045

Re: MUR 1412

Dear Sir or Madam:

On September 29, 1982, the Federal Election Commission determined that there is reason to believe that your organization violated 2 U.S.C. § 441b a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), by making a corporate contribution. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Additionally, please submit answers to the enclosed questions within ten days of your receipt of this letter.

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

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

84040455218

National Right to Life Committee, Inc.  
Page Two

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Deborah Curry, the attorney assigned to this matter, at (202)523-4000.

Sincerely,

*Frank P. Reiche*

Frank P. Reiche  
Chairman for the  
Federal Election Commission

Enclosures

1. Interrogatories
2. General Counsel's Factual and Legal Analysis
3. Procedures
4. Designation of Counsel Statement

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## INTERROGATORIES

MUR 1412

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  - a. List all administrative expenses covered by the \$1,159 reimbursement: include to whom paid, purpose of the administrative expense, amount and date.
  - b. Please explain why each of these administrative expenses was not paid for directly by NRLC.
  - c. Was the reimbursement of \$1,159 placed in a bank account independent of voluntary contribution account. If yes, submit evidence of this.
2. NRLPAC's Year End Report (1980) disclosed initially a loan repayment of \$3,000 by NRLC for a simultaneously reported NRLPAC loan to NRLC of \$9,000.
  - a. Did NRLPAC make a loan of \$9,000 to NRLC on October 16, 1980? If yes, include loan instruments.
  - b. Has the loan in question been repaid by NRLC?

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3. On June 2, 1982 NRLPAC's Year End Amendment effected a change of the loan repayment (\$3,000) to a \$3,000 payment for reimbursement of administrative expenses.

a. Please explain the reason why this change occurred.

b. List all administrative expenses covered by the \$3,000 reimbursement: include to whom paid, purpose of the administrative expense, amount and date.

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b. Please explain why each of these administrative expenses was not paid for directly by NRLC.

c. Was the reimbursement of \$6,000 placed in a bank account independent of the voluntary contribution account? If yes, submit evidence of this.

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**FEDERAL ELECTION COMMISSION**  
**GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS**

**MUR 1412**  
**STAFF MEMBER(S) & TEL. NO.**  
**Deborah Curry (202) 523-4000**

**RESPONDENT:** National Right to Life Political Action  
Committee/National Right to Life Committee, Inc.

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

**SUMMARY OF ALLEGATIONS**

8 4 0 4 0 4 5 5 2 2 2  
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2/ NRLPAC relies on AOR 1976-111, AO 1979-33, and AO 1979-72. NRLPAC contends that since NRLC could have paid these administrative costs directly, under the authority of these advisory opinions, NRLPAC may be reimbursed for these expenses. The Office of General Counsel in evaluating the AOs relied on by NRLPAC, found that each concerned itself with a situation in which an apparent 'mistake' had been made and in which the original payment by the committees [separate segregated funds] involved was inadvertent. There is no indication of inadvertence on the part of NRLPAC, therefore its reliance on the advisory opinions in its response is misplaced.

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On June 2, 1982 NRLPAC submitted a Year-End Amendment (1980) that effected the change of the loan repayment to a payment for reimbursement of administrative expenses. That Year-End Amendment disclosed a receipt of \$3,000 from the connected organization NRLC for reimbursement of administrative expenses.

C. Interim Communications

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D. 30 Day Run Off Report

Finally, on May 19, 1982, the Office of General Counsel received an update from RAD relating to NRLPAC's 30 Day Run Off Report. The 30 Day Run Off Report for 1981 (01/01/81 to 05/11/81) disclosed an additional receipt for \$6,000 by NRLPAC from NRLC. This payment is described as a "repayment of administrative expenses." Therefore, the receipt by NRLPAC of \$3,000 from NRLC in its Year-End Amendment (1980) plus this

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additional receipt of \$6,000 in the 30 Day Run Off Report equals the total amount of the loan NRLC originally reported in the Year End Report (1980).

## II. LEGAL ANALYSIS

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(2) for purposes of this section and section 79L(h) of Title 15, the term "contribution or expenditure" shall include any direct or indirect payment, distribution, loan, advance, deposit, or gift of money, or any services, or anything of value ... to any candidate, campaign committee, or political party or organization, in connection with any of the offices referred to in this section, ....

(emphasis added).

While 2 U.S.C. § 441b expressly forbids corporate contributions and the acceptance of such contributions in connection with a federal election it does provide for exceptions to this broad prohibition. 2 U.S.C. § 441b(2)(c) provides an exemption for corporate funds used in the establishment, administration, and solicitation of contributions to a separate segregated fund of the corporation. These monies are not considered contributions or expenditures under the Act.

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§ 11 C.F.R. § 114.1(a)(2)(iii). However, this exemption for establishment, administration and solicitation costs may not be used as a means to exchange treasury monies for voluntary contributions to a separate segregated fund. 11 C.F.R. § 114.5(b).

Therefore, establishment, administrative, and solicitation costs must be paid for directly by the corporation. Subsequent reimbursement by the corporation (NRLC) to its separate segregated fund (NRLPAC) would constitute a violation of 2 U.S.C. § 441b. Additionally, any direct or indirect payment (loan repayment) made by NRLC to NRLPAC would also constitute a violation of 2 U.S.C. § 441b.

Here, we have an initial transaction that was characterized as a reimbursement of administrative expenses. Then we have a later transaction that was characterized as a loan repayment which was subsequently changed to a reimbursement of administrative expenses with repayments noted as such.

Whether or not these transactions are characterized as reimbursements of administrative expenses or loan repayments, they would still be in violation of 2 U.S.C. § 441b.

Therefore, the Office of General Counsel recommends that the Commission find reason to believe that the National Right to Life Political Action Committee and the National Right to Life Committee, Inc. violated 2 U.S.C. § 441b.

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**III. RECOMMENDATION**

Find reason to believe that the National Right to Life  
Political Action Committee and National Right to Life Committee,  
Inc. violated 2 U.S.C. § 441b.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
National Right to Life ) MUR 1412  
Political Action Committee/ )  
National Right to Life )  
Committee, Inc. )

CERTIFICATION

I, Marjorie W. Emons, Recording Secretary for the Federal Election Commission Executive Session on September 29, 1982, do hereby certify that the Commission decided by a vote of 5-1 to take the following actions in MUR 1412:

1. Find reason to believe that the National Right to Life Political Action Committee and National Right to Life Committee, Inc. violated 2 U.S.C. §441b.
2. Approve the letter and interrogatories attached to the General Counsel's September 13, 1982 report in this matter.

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

Attest:

9-30-82

Date

Marjorie W. Emons

Marjorie W. Emons  
Secretary of the Commission

84040455228



BEFORE THE FEDERAL ELECTION COMMISSION

September 13, 1982

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

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In the Matter of )  
 )  
National Right to Life )  
Political Action Committee/ )  
National Right to Life )  
Committee, Inc. )

MUR 1412

GENERAL COUNSEL'S REPORT

I. BACKGROUND/PREVIOUS COMMISSION ACTION

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This matter was generated by the Reports Analysis Division, after its analysis of the disclosure reports of the National Right to Life Political Action Committee (hereinafter "NRLPAC"). RAD noted, during review of several of NRLPAC's Reports of Receipts and Expenditures, that NRLPAC received funds from its connected organization National Right to Life Committee, Inc. (hereinafter "NRLC") possibly constituting a violation of the Federal Election Campaign Act of 1971, as amended (hereinafter the "Act").

On July 14, 1982, the Commission decided to defer action on MUR 1412 until resolution of the pending Advisory Opinion Request from the National Treasury Employees Union. A detailed factual analysis of this matter was presented in the First General Counsel's Report dated July 12, 1982.

The facts which make up this MUR can be divided into essentially two transactions. The first transaction being the repayment by NRLC of \$1,159, noted in the October 1980 Quarterly

Report, that was characterized as a reimbursement of administrative expenses by NRLPAC. The second transaction being a repayment of \$3,000 that was characterized in the 1980 Year End Report as a loan repayment by NRLC to NRLPAC. In an amendment to the 1980 Year End Report this repayment was changed to a repayment for reimbursement of administrative expenses. A second repayment of \$6,000 was also reported as reimbursement of administrative expenses. The total amount of reimbursements for administrative expenses (\$9,000) equals the total amount of the loan (\$9,000) reported by NRLPAC on its initial Year End Report.

## II. LEGAL ANALYSIS

2 U.S.C. § 441b(a) expressly prohibits corporate contributions or expenditures in connection with federal elections. See also 11 C.F.R. § 114.2(b). Similarly, 2 U.S.C. § 441b(a) prohibits the acceptance of such prohibited contributions. 2 U.S.C. § 441b(a)(2) elaborates on the meaning of contribution or expenditure stating:

(2) for purposes of this section and section 79L(h) of Title 15, the term "contribution or expenditure" shall include any direct or indirect payment, distribution, loan, advance, deposit, or gift of money, or any services, or anything of value ... to any candidate, campaign committee, or political party or organization, in connection with any of the offices referred to in this section, ....

(emphasis added).

While 2 U.S.C. § 441b expressly forbids corporate contributions and the acceptance of such contributions in

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connection with a federal election it does provide for exceptions to this broad prohibition. 2 U.S.C. § 441b(2)(c) provides an exemption for corporate funds used in the establishment, administration, and solicitation of contributions to a separate segregated fund of the corporation. These monies are not considered contributions or expenditures under the Act. § 11 C.F.R. § 114.1(iii). However, this exemption for establishment, administration and solicitation costs may not be used as a means to exchange treasury monies for voluntary contributions to a separate segregated fund. 11 C.F.R. § 114.5(b).

Therefore, establishment, administrative, and solicitation costs must be paid for directly by the corporation. Subsequent reimbursement by the corporation (NRLC) to its separate segregated fund (NRLPAC) would constitute a violation of 2 U.S.C. § 441b. Additionally, any direct or indirect payment (loan repayment) made by NRLC to NRLPAC would also constitute a violation of 2 U.S.C. § 441b.

Here, we have an initial transaction that was characterized as a reimbursement of administrative expenses. Then we have a later transaction that was characterized as a loan repayment which was subsequently changed to a reimbursement of administrative expenses with repayments noted as such.

Whether or not these transactions are characterized as reimbursements of administrative expenses or loan repayments, they would still be in violation of 2 U.S.C. § 441b.

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Therefore, the Office of General Counsel recommends that the Commission find reason to believe that the National Right to Life Political Action Committee and the National Right to Life Committee, Inc. violated 2 U.S.C. § 441b. Further facts must be solicited to determine whether these transactions are loan repayments or reimbursements of administrative expenses. Therefore, the Office of General Counsel recommends that interrogatories be sent to NRLPAC.

### III. RECOMMENDATION

1. Find reason to believe that the National Right to Life Political Action Committee and National Right to Life Committee, Inc. violated 2 U.S.C. § 441b.
2. Approve attached letter and interrogatories.

Sept 15, 1982  
Date

Charles N. Steele  
General Counsel

BY:   
Kenneth A. Gross  
Associate General Counsel

### Attachments

1. Letter and Interrogatories (2)
2. General Counsel's Factual and Legal Analysis (2)

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Attachment 1

National Right to Life Committee, Inc.  
529 14th Street, N.W.  
Suite 341  
Washington, D.C. 20045

Re: MUR 1412

Dear Sir or Madam:

On September , 1982, the Federal Election Commission determined that there is reason to believe that your organization violated 2 U.S.C. § 441b a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), by making a corporate contribution. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Additionally, please submit answers to the enclosed questions within ten days of your receipt of this letter.

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

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

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John Stanton  
Page Two

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Deborah Curry, the attorney assigned to this matter, at (202) 523-4000.

Sincerely,

Enclosures

1. Interrogatories
2. General Counsel's Factual and Legal Analysis
3. Procedures
4. Designation of Counsel Statement

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(3)

**INTERROGATORIES**

**MUR 1412**

1. On the October Quarterly Report (1980) National Right to Life Political Action Committee (hereinafter "NRLPAC") lists a receipt of \$1,159 from National Right to Life Committee, Inc. (hereinafter "NRLC") for reimbursement of administrative expenses.

a. List all administrative expenses covered by the \$1,159 reimbursement: include to whom paid, purpose of the administrative expense, amount and date.

b. Please explain why each of these administrative expenses was not paid for directly by NRLC.

c. Was the reimbursement of \$1,159 placed in a bank account independent of voluntary contribution account. If yes, submit evidence of this.

2. NRLPAC's Year End Report (1980) disclosed initially a loan repayment of \$3,000 by NRLC for a simultaneously reported NRLPAC loan to NRLC of \$9,000.

a. Did NRLPAC make a loan of \$9,000 to NRLC on October 16, 1980? If yes, include loan instruments.

b. Has the loan in question been repaid by NRLC?

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3. On June 2, 1982 NRLPAC's Year End Amendment effected a change of the loan repayment (\$3,000) to a \$3,000 payment for reimbursement of administrative expenses.

a. Please explain the reason why this change occurred.

b. List all administrative expenses covered by the \$3,000 reimbursement: include to whom paid, purpose of the administrative expense, amount and date.

4. NRLPAC's 30 Day Run Off Report indicates that NRLPAC received an additional \$6,000 payment from NRLC for reimbursement of administrative expenses.

a. List all administrative expenses covered by the \$6,000 reimbursement: include to whom paid, purpose of the administrative expense, amount and date.

b. Please explain why each of these administrative expenses was not paid for directly by NRLC.

c. Was the reimbursement of \$6,000 placed in a bank account independent of the voluntary contribution account? If yes, submit evidence of this.

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**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

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John Stanton, Treasurer  
National Right to Life Political  
Action Committee  
529 14th Street, N.W., Suite 341  
Washington, D.C. 20045

Re: MUR 1412

Dear Mr. Stanton:

On September , 1982, the Federal Election Commission determined that there is reason to believe that your committee, National Right to Life Political Action Committee, violated 2 U.S.C. § 441b a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") by accepting a corporate contribution. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Additionally, please submit answers to the enclosed questions within ten days of your receipt of this letter.

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

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

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National Right to Life Committee, Inc.  
Page Two

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Deborah Curry, the attorney assigned to this matter, at (202)523-4000.

Sincerely,

Enclosures

1. Interrogatories
2. General Counsel's Factual and Legal Analysis
3. Procedures
4. Designation of Counsel Statement

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INTERROGATORIES

MUR 1412

1. On the October Quarterly Report (1980) National Right to Life Political Action Committee (hereinafter "NRLPAC") lists a receipt of \$1,159 from National Right to Life Committee, Inc. (hereinafter "NRLC") for reimbursement of administrative expenses.

a. List all administrative expenses covered by the \$1,159 reimbursement: include to whom paid, purpose of the administrative expense, amount and date.

b. Please explain why each of these administrative expenses was not paid for directly by NRLC.

c. Was the reimbursement of \$1,159 placed in a bank account independent of voluntary contribution account. If yes, submit evidence of this.

2. NRLPAC's Year End Report (1980) disclosed initially a loan repayment of \$3,000 by NRLC for a simultaneously reported NRLPAC loan to NRLC of \$9,000.

a. Did NRLPAC make a loan of \$9,000 to NRLC on October 16, 1980? If yes, include loan instruments.

b. Has the loan in question been repaid by NRLC?

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3. On June 2, 1982 NRLPAC's Year End Amendment effected a change of the loan repayment (\$3,000) to a \$3,000 payment for reimbursement of administrative expenss.

a. Please explain the reason why this change occurred.

b. List all administrative expenses covered by the \$3,000 reimbursement: include to whom paid, purpose of the administrative expense, amount and date.

4. NRLPAC's 30 Day Run Off Report indicates that NRLPAC received an additional \$6,000 payment from NRLC for reimbursement of administrative expenses.

a. List all administrative expenses covered by the \$6,000 reimbursement: include to whom paid, purpose of the administrative expense, amount and date.

b. Please explain why each of these administrative expenses was not paid for directly by NRLC.

c. Was the reimbursement of \$6,000 placed in a bank account independent of the voluntary contribution account? If yes, submit evidence of this.

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**FEDERAL ELECTION COMMISSION  
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS**

*Attachment 2*

MUR 1412  
STAFF MEMBER(S) & TEL. NO.  
Deborah Curry (202)523-4000

**RESPONDENT:** National Right to Life Political Action  
Committee/National Right to Life Committee, Inc.

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

**SUMMARY OF ALLEGATIONS**

8 4 0 4 0 4 5 5 2 4 1  
This matter was generated by the Reports Analysis Division (hereinafter "RAD"), after its analysis of the disclosure reports of the National Right to Life Political Action Committee (hereinafter "NRLPAC"). RAD noted during review of several of NRLPAC's Reports of Receipts and Expenditures, that NRLPAC received funds from its connected organization National Right to Life Committee, Inc. (hereinafter "NRLC") possibly constituting a violation of the Federal Election Campaign Act of 1971, as amended (hereinafter the "Act").

**FACTUAL BASIS AND LEGAL ANALYSIS**

**A. October Quarterly Report**

RAD's review of the October Quarterly Report (1980) disclosed a receipt of \$1,159 by NRLPAC from its connected organization NRLC. This entry was described as a "Reimbursement of Administrative Expenses". A Request for Additional Information (hereinafter "RFAI") was sent on March 10, 1981.

On March 27, 1981 counsel for NRLPAC responded by stating that the Act "authorized a connected organization to reimburse its separate segregated fund for administrative expenses paid by the PAC." 1/ In that response, NRLPAC cites three Advisory Opinions (hereinafter "AO") in support of this contention. 2/ Therefore, NRLPAC refused to refund any of the funds to its connected organization.

B. Year End Report

RAD's review of NRLPAC's Year End Report (1980) disclosed a loan repayment of \$3,000 from its connected organization NRLC. NRLPAC had reported a \$9,000 loan to its connected organization, NRLC. An RFAI was sent on April 30, 1981 and a second notice was sent on May 22, 1981 for failure to respond. On May 27, 1981, counsel for NRLPAC called and was advised by RAD that the loan repayment had to be from permissible sources. At that point, counsel for NRLPAC stated that he would simply change the entry to "reimbursement for administrative expenses."

1/ NRLPAC stated that "the administrative expenses reimbursed included legal work for the PAC, computer costs, list rental and bank charges.

2/ NRLPAC relies on AOR 1976-111, AO 1979-33, and AO 1979-72. NRLPAC contends that since NRLC could have paid these administrative costs directly, under the authority of these advisory opinions, NRLPAC may be reimbursed for these expenses. The Office of General Counsel in evaluating the AOs relied on by NRLPAC, found that each concerned itself with a situation in which an apparent 'mistake' had been made and in which the original payment by the committees [separate segregated funds] involved was inadvertent. There is no indication of inadvertence on the part of NRLPAC, therefore its reliance on the advisory opinions in its response is misplaced.

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On June 2, 1982 NRLPAC submitted a Year-End Amendment (1980) that effected the change of the loan repayment to a payment for reimbursement of administrative expenses. That Year-End Amendment disclosed a receipt of \$3,000 from the connected organization NRLC for reimbursement of administrative expenses.

C. Interim Communications

On July 24, 1982, letters were sent out by RAD with regard to the October Quarterly Report, discussed supra and the Year-End amendment, discussed supra. In both cases it was requested that NRLPAC refund these monies. To date there has been no refund of these monies.

On August 13, 1982 NRLPAC responded to these letters reiterating its position that in light of the previously mentioned AOs, there was no violation. Furthermore, NRLPAC asserts that "[t]here is no requirement that the corporation must either pay the administrative expenses directly or [that] such monies must be segregated into an account separate from the contributions account."

D. 30 Day Run Off Report

Finally, on May 19, 1982, the Office of General Counsel received an update from RAD relating to NRLPAC's 30 Day Run Off Report. The 30 Day Run Off Report for 1981 (01/01/81 to 05/11/81) disclosed an additional receipt for \$6,000 by NRLPAC from NRLC. This payment is described as a "repayment of administrative expenses." Therefore, the receipt by NRLPAC of \$3,000 from NRLC in its Year-End Amendment (1980) plus this

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additional receipt of \$6,000 in the 30 Day Run Off Report equals the total amount of the loan NRLC originally reported in the Year End Report (1980).

## II. LEGAL ANALYSIS

2 U.S.C. § 441b(a) expressly prohibits corporate contributions or expenditures in connection with federal elections. See also 11 C.F.R. § 114.2(b). Similarly, 2 U.S.C. § 441b(a) prohibits the acceptance of such prohibited contributions. 2 U.S.C. § 441b(a)(2) elaborates on the meaning of contribution or expenditure stating:

(2) for purposes of this section and section 79L(h) of Title 15, the term "contribution or expenditure" shall include any direct or indirect payment, distribution, loan, advance, deposit, or gift of money, or any services, or anything of value ... to any candidate, campaign committee, or political party or organization, in connection with any of the offices referred to in this section, ....

(emphasis added).

While 2 U.S.C. § 441b expressly forbids corporate contributions and the acceptance of such contributions in connection with a federal election it does provide for exceptions to this broad prohibition. 2 U.S.C. § 441b(2)(c) provides an exemption for corporate funds used in the establishment, administration, and solicitation of contributions to a separate segregated fund of the corporation. These monies are not considered contributions or expenditures under the Act.

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§ 11 C.F.R. § 114.1(iii). However, this exemption for establishment, administration and solicitation costs may not be used as a means to exchange treasury monies for voluntary contributions to a separate segregated fund. 11 C.F.R. § 114.5(b).

Therefore, establishment, administrative, and solicitation costs must be paid for directly by the corporation. Subsequent reimbursement by the corporation (NRLC) to its separate segregated fund (NRLPAC) would constitute a violation of 2 U.S.C. § 441b. Additionally, any direct or indirect payment (loan repayment) made by NRLC to NRLPAC would also constitute a violation of 2 U.S.C. § 441b.

Here, we have an initial transaction that was characterized as a reimbursement of administrative expenses. Then we have a later transaction that was characterized as a loan repayment which was subsequently changed to a reimbursement of administrative expenses with repayments noted as such.

Whether or not these transactions are characterized as reimbursements of administrative expenses or loan repayments, they would still be in violation of 2 U.S.C. § 441b.

Therefore, the Office of General Counsel recommends that the Commission find reason to believe that the National Right to Life Political Action Committee and the National Right to Life Committee, Inc. violated 2 U.S.C. § 441b.

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**III. RECOMMENDATION**

Find reason to believe that the National Right to Life  
Political Action Committee and National Right to Life Committee,  
Inc. violated 2 U.S.C. § 441b.

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FEDERAL ELECTION COMMISSION  
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR 1412  
STAFF MEMBER(S) & TEL. NO.  
Deborah Curry (202)523-4000

RESPONDENT: National Right to Life Political Action  
Committee/National Right to Life Committee, Inc.

SOURCE OF MUR: INTERNALLY GENERATED

SUMMARY OF ALLEGATIONS

84040155247 This matter was generated by the Reports Analysis Division (hereinafter "RAD"), after its analysis of the disclosure reports of the National Right to Life Political Action Committee (hereinafter "NRLPAC"). RAD noted during review of several of NRLPAC's Reports of Receipts and Expenditures, that NRLPAC received funds from its connected organization National Right to Life Committee, Inc. (hereinafter "NRLC") possibly constituting a violation of the Federal Election Campaign Act of 1971, as amended (hereinafter the "Act").

FACTUAL BASIS AND LEGAL ANALYSIS

A. October Quarterly Report

RAD's review of the October Quarterly Report (1980) disclosed a receipt of \$1,159 by NRLPAC from its connected organization NRLC. This entry was described as a "Reimbursement of Administrative Expenses". A Request for Additional Information (hereinafter "RFAI") was sent on March 10, 1981.

On March 27, 1981 counsel for NRLPAC responded by stating that the Act "authorized a connected organization to reimburse its separate segregated fund for administrative expenses paid by the PAC." 1/ In that response, NRLPAC cites three Advisory Opinions (hereinafter "AO") in support of this contention. 2/ Therefore, NRLPAC refused to refund any of the funds to its connected organization.

B. Year End Report

RAD's review of NRLPAC's Year End Report (1980) disclosed a loan repayment of \$3,000 from its connected organization NRLC. NRLPAC had reported a \$9,000 loan to its connected organization, NRLC. An RFAI was sent on April 30, 1981 and a second notice was sent on May 22, 1981 for failure to respond. On May 27, 1981, counsel for NRLPAC called and was advised by RAD that the loan repayment had to be from permissible sources. At that point, counsel for NRLPAC stated that he would simply change the entry to "reimbursement for administrative expenses."

1/ NRLPAC stated that "the administrative expenses reimbursed included legal work for the PAC, computer costs, list rental and bank charges.

2/ NRLPAC relies on AOR 1976-111, AO 1979-33, and AO 1979-72. NRLPAC contends that since NRLC could have paid these administrative costs directly, under the authority of these advisory opinions, NRLPAC may be reimbursed for these expenses. The Office of General Counsel in evaluating the AOs relied on by NRLPAC, found that each concerned itself with a situation in which an apparent 'mistake' had been made and in which the original payment by the committees [separate segregated funds] involved was inadvertent. There is no indication of inadvertence on the part of NRLPAC, therefore its reliance on the advisory opinions in its response is misplaced.

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On June 2, 1982 NRLPAC submitted a Year-End Amendment (1980) that effected the change of the loan repayment to a payment for reimbursement of administrative expenses. That Year-End Amendment disclosed a receipt of \$3,000 from the connected organization NRLC for reimbursement of administrative expenses.

C. Interim Communications

On July 24, 1982, letters were sent out by RAD with regard to the October Quarterly Report, discussed supra and the Year-End amendment, discussed supra. In both cases it was requested that NRLPAC refund these monies. To date there has been no refund of these monies.

On August 13, 1982 NRLPAC responded to these letters reiterating its position that in light of the previously mentioned AOs, there was no violation. Furthermore, NRLPAC asserts that "[t]here is no requirement that the corporation must either pay the administrative expenses directly or [that] such monies must be segregated into an account separate from the contributions account."

D. 30 Day Run Off Report

Finally, on May 19, 1982, the Office of General Counsel received an update from RAD relating to NRLPAC's 30 Day Run Off Report. The 30 Day Run Off Report for 1981 (01/01/81 to 05/11/81) disclosed an additional receipt for \$6,000 by NRLPAC from NRLC. This payment is described as a "repayment of administrative expenses." Therefore, the receipt by NRLPAC of \$3,000 from NRLC in its Year-End Amendment (1980) plus this

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additional receipt of \$6,000 in the 30 Day Run Off Report equals the total amount of the loan NRLC originally reported in the Year End Report (1980).

## II. LEGAL ANALYSIS

2 U.S.C. § 441b(a) expressly prohibits corporate contributions or expenditures in connection with federal elections. See also 11 C.F.R. § 114.2(b). Similarly, 2 U.S.C. § 441b(a) prohibits the acceptance of such prohibited contributions. 2 U.S.C. § 441b(a)(2) elaborates on the meaning of contribution or expenditure stating:

(2) for purposes of this section and section 79L(h) of Title 15, the term "contribution or expenditure" shall include any direct or indirect payment, distribution, loan, advance, deposit, or gift of money, or any services, or anything of value ... to any candidate, campaign committee, or political party or organization, in connection with any of the offices referred to in this section, ....

(emphasis added).

While 2 U.S.C. § 441b expressly forbids corporate contributions and the acceptance of such contributions in connection with a federal election it does provide for exceptions to this broad prohibition. 2 U.S.C. § 441b(2)(c) provides an exemption for corporate funds used in the establishment, administration, and solicitation of contributions to a separate segregated fund of the corporation. These monies are not considered contributions or expenditures under the Act.

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§ 11 C.F.R. § 114.1(iii). However, this exemption for establishment, administration and solicitation costs may not be used as a means to exchange treasury monies for voluntary contributions to a separate segregated fund. 11 C.F.R. § 114.5(b).

Therefore, establishment, administrative, and solicitation costs must be paid for directly by the corporation. Subsequent reimbursement by the corporation (NRLC) to its separate segregated fund (NRLPAC) would constitute a violation of 2 U.S.C. § 441b. Additionally, any direct or indirect payment (loan repayment) made by NRLC to NRLPAC would also constitute a violation of 2 U.S.C. § 441b.

Here, we have an initial transaction that was characterized as a reimbursement of administrative expenses. Then we have a later transaction that was characterized as a loan repayment which was subsequently changed to a reimbursement of administrative expenses with repayments noted as such.

Whether or not these transactions are characterized as reimbursements of administrative expenses or loan repayments, they would still be in violation of 2 U.S.C. § 441b.

Therefore, the Office of General Counsel recommends that the Commission find reason to believe that the National Right to Life Political Action Committee and the National Right to Life Committee, Inc. violated 2 U.S.C. § 441b.

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**III. RECOMMENDATION**

Find reason to believe that the National Right to Life Political Action Committee and National Right to Life Committee, Inc. violated 2 U.S.C. § 441b.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )

National Right to Life Political )  
Action Committee )

MUR 1412

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 14, 1982, the Commission decided by a vote of 6-0 to defer action on MUR 1412 until resolution of the pending Advisory Opinion Request from National Treasury Employees Union.

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

Attest:

7-14-82

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary:  
Circulated on 48 hour tally basis:

7-12-82, 1:09  
7-12-82, 4:00

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**SENSITIVE**

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

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

**FIRST GENERAL COUNSEL'S REPORT**

82 JUL 12 P 1: 09

**DATE AND TIME OF TRANSMITTAL**  
**BY OGC TO THE COMMISSION** 7-12-82

**MUR 1412**  
**STAFF MEMBER:** Deborah Curry

**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:** National Right to Life Political  
Action Committee

**RELEVANT STATUTE:** 2 U.S.C. § 441b(a) 11 C.F.R. § 114.5(b)  
11 100.7(a)(1)(D)

**INTERNAL REPORTS CHECKED:** MUR 1126

**FEDERAL AGENCIES CHECKED:** None

**GENERATION OF THE MATTER**

This matter was generated by the Reports Analysis Division (hereinafter "RAD"), after its analysis of the disclosure reports of the National Right to Life Political Action Committee (hereinafter "NRLPAC"). RAD noted during review of several of NRLPAC's Reports of Receipts and Expenditures, that NRLPAC received funds from its connected organization National Right to Life Committee, Inc. (hereinafter "NRLC") possibly constituting a violation of the Federal Election Campaign Act of 1971, as amended (hereinafter the "Act").

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## FACTUAL AND LEGAL ANALYSIS

### A. October Quarterly Report

RAD's review of the October Quarterly Report (1980) disclosed a receipt of \$1,159 by NRLPAC from its connected organization NRLC. This entry was described as a "Reimbursement of Administrative Expenses" (See Attachment 1 page 6 of the attachments). A Request for Additional Information (hereinafter "RFAI") was sent on March 10, 1981.

On March 27, 1981 counsel for NRLPAC responded by stating that the Act "authorized a connected organization to reimburse its separate segregated fund for administrative expenses paid by the PAC." 1/ In that response, NRLPAC cites three Advisory Opinions (hereinafter "AO") in support of this contention. (See Attachment 1 pages 10 and 11 of attachments). 2/ Therefore, NRLPAC refused to refund any of the funds to its connected organization.

On April 12, 1981, RAD made a Request for Guidance to the Office of General Counsel so that the legal adequacy of this response could be determined (Attachment 1 page 12 of attachments).

---

1/ NRLPAC states that "the administrative expenses reimbursed included legal work for the PAC, computer costs, list rental and bank charges.

2/ NRLPAC relies on AOR 1976-111, AO 1979-33, and AO 1979-72. NRLPAC contends that since NRLC could have paid these administrative costs directly, under the authority of these advisory opinions, NRLPAC may be reimbursed for these expenses. See Attachment 1 page 11 of the attachments).

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B. Year End Report

Meanwhile, RAD's review of NRLPAC's Year End Report (1980) disclosed a loan repayment of \$3,000 from its connected organization NRLC. (See Attachment 1 page 30 of attachments). NRLPAC had previously reported a \$9,000 loan to its connected organization, NRLC. An RFAI was sent on April 30, 1981 and a second notice was sent on May 22, 1981 for failure to respond. On May 27, 1981, counsel for NRLPAC called and was advised by RAD that the loan repayment had to be from permissible sources. At that point, counsel for NRLPAC stated that he would simply change the entry to a "reimbursement for administrative expenses."

On June 2, 1982 NRLPAC submitted a Year-End Amendment (1980) that effected the change of the loan repayment to a payment for reimbursement of administrative expenses. (See Attachment 1 pages 17-21 of the attachments). That Year-End Amendment disclosed a receipt of \$3,000 from the connected organization NRLC for reimbursement of administrative expenses. (See Attachment 1 page 30 of the attachments).

C. Interim Communications

On July 6, 1981 the Office of General Counsel responded to the initial RAD Request for Guidance, noted supra. This response analyzed the AO's in question and NRLPAC's reliance on them. The Office of General Counsel in evaluating the AOs relied on by NRLPAC, found that each concerned "itself with a situation in which an apparent 'mistake' had been made and in which the original payment by the committees [separate segregated funds]

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involved was inadvertent." (See Attachment 1 page 24 of the attachments.) The conclusion of the OGC response was that since there was no indication of inadvertence on the part of NRLPAC its reliance on the advisory opinions in its response was misplaced.

Thereafter, on July 24, 1982, letters were sent out by RAD with regard to the October Quarterly Report, discussed supra and the Year-End amendment, discussed supra. In both cases it was requested that NRLPAC refund these monies. To date there has been no refund of these monies.

On August 13, 1982 NRLPAC responded to these letters reiterating its position that in light of the previously mentioned AOs, there was no violation. Furthermore, NRLPAC asserts that "[t]here is no requirement that the corporation must either pay the administrative expenses directly or [that] such monies must be segregated into an account separate from the contributions account." (See Attachment 1 page 29 of attachments).

D. 30 Day Run Off Report

Finally, on May 19, 1982, the Office of General Counsel received an update from RAD relating to NRLPAC's 30 Day Run Off Report. The 30 Day Run Off Report for 1981 (01/01/81 to 05/11/81) disclosed an additional receipt for \$6,000 by NRLPAC from NRLC. This payment is described as a "repayment of administrative expenses." (See Attachment 1 page 31 of attachments). Therefore, the receipt by NRLPAC of \$3,000 from

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NRLC in its Year-End Amendment (1980) plus this additional receipt of \$6,000 in the 30 Day Run Off Report equals the total amount of the loan NRLC originally sought to pay back in the Year End Report (1980).

#### LEGAL ANALYSIS

Essentially there are two transactions involved here. The first transaction is the repayment by NRLC in the October Quarterly Report that was characterized as a reimbursement of administrative expenses by NRLCPAC. The second transaction is a repayment that was initially characterized as a loan repayment by NRLC to NRLPAC. Subsequent to that Year End Report these repayments were changed to repayments for reimbursement of administrative expenses.

On June 15, 1982 the Commission agreed to defer action on MUR 1411 until resolution of the pending Advisory Opinion Request from the National Treasury Union, since the issues involved were similar. Since this matter also has similar issues, the Office of General Counsel recommends deferral of action on this matter until the issues in the pending Advisory Opinion Request are resolved.

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RECOMMENDATION

Defer action on MUR1412 until resolution of the pending  
Advisory Opinion Request from National Treasury Employees Union.

July 12, 1982  
Date

Charles N. Steele  
General Counsel

Kenneth A. Gross  
By: Kenneth A. Gross  
Associate General Counsel

Attachment:

RAD Referral

84040155259

MUR 1412

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
National Right to Life )  
Political Action Committee )

81L-71

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on December 15, 1981, do hereby certify that the Commission took the following actions in the above-captioned matter:

1. Failed in a vote of 2-2 to pass a motion to take no further action at this time with respect to opening a MUR and return the file to the Reports Analysis Division.

Commissioners Aikens and Harris voted affirmatively for the motion; Commissioners Reiche and Tiernan dissented; Commissioner Thomson abstained on the vote; Commissioner McGarry was not present at the time of the vote.

2. Decided by a vote of 5-0 to refer this matter to the Office of General Counsel for consideration as a MUR.

Commissioners Aikens, Harris, Reiche, Thomson, and Tiernan voted affirmatively for the decision; Commissioner McGarry was not present at the time of the vote.

Attest:

12/23/81

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

84040455260



REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 22 October 1981

ANALYST: Mark Kleinman *TK*

- I. COMMITTEE: National Right to Life Political Action Committee (C00111278)  
Phil Moran, Treasurer  
529 14th Street, N.W., Suite 341  
Washington, D.C. 20045
- II. RELEVANT STATUTE: 2 U.S.C. 441b(a); 11 C.F.R. 114.5(b)
- III. BACKGROUND:

- A. Commingling of Treasury and Voluntary Dollars --- 2 U.S.C. 441b(a);  
11 C.F.R. 114.5(b)

1) October Quarterly Report

The committee's report disclosed a receipt of \$1,159 from its connected organization described as a "Reimbursement of Administrative Expenses" (Attachment #2). A Request For Additional Information was sent on March 10, 1981 (Attachment #4). On March 27, 1981, the committee responded by stating that the Act authorized a connected membership organization to reimburse its separate segregated fund for administrative expenses paid by their committee. The committee referred to three Advisory Opinions which they contended supported the above (Attachment #5). On April 20, 1981, a Request For Guidance was sent to the Office of General Counsel to determine the adequacy of this response (Attachment #6). On July 6, 1981, the Office of General Counsel responded by stating that this was a violation. The three separate segregated funds which requested Advisory Opinions indicated that they had mistakenly made payments which could have been paid for by their connected organization (Attachment #12). However, there was no such indication that this was the case with this committee. On July 24, 1981, a Second Letter was sent for an inadequate response (Attachment #13). On August 13, 1981, the committee responded again by reiterating its position that this was not a violation (Attachment #15).

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National Right to Life Political Action Committee (C00111278)  
Reports Analysis Referral to Office of General Counsel

2) Year End Report

The committee's report disclosed a loan repayment of \$3,000 from its connected organization (Attachment #3). The committee had previously reported a \$9,000 loan to its connected organization. A Request For Additional Information was sent on April 30, 1981 (Attachment #7) and a Second Notice was sent on May 22, 1981 (Attachment #8) for failure to respond. On May 27, 1981, the committee called and was advised that a loan repayment had to be from permissible sources. The caller stated that, in that case, they would change this to a "reimbursement for administrative expenses" (Attachment #9). 1/ On June 2, 1981 the committee responded by changing this receipt to a "Reimbursement for Administrative Expenses." In addition, the response had indicated that they were advised by the Commission to change the receipt from a loan repayment to a reimbursement for administrative expenses (Attachment #10). On June 2, 1981, the committee called to determine if we had received their response, and what if anything, the Commission would do. The caller was advised that we had received their response and that we would review it closely. The caller was also advised that it was the committee which initiated this change and not through any advice of the Commission (Attachment #11).

3) Year End Amendment

The committee's amendment disclosed a receipt of \$3,000 from their connected organization described as a "Reimbursement for Administrative Expenses" (Attachment #10). A Request for Additional Information was sent on July 24, 1981 (Attachment #14). On August 13, 1981, the committee responded by stating that this was not a violation (Attachment #15).

1/ See III, A(1) regarding Request for Guidance

IV. OTHER PENDING ACTIONS INITIATED BY RAD:

There are no outstanding Requests For Additional Information or matters requiring to be referred at this time.

84040455262

## ATTACHMENT I

①

MUR 1412



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

22 October 1981

TO : CHARLES N. STEELE  
GENERAL COUNSEL

THROUGH : B. ALLEN CLUTTER *AK*  
STAFF DIRECTOR

FROM : JOHN D. GIBSON *JP*  
ASSISTANT STAFF DIRECTOR, RAD

SUBJECT : REFERRAL OF NATIONAL RIGHT TO LIFE POLITICAL ACTION COMMITTEE

Please find the attached referral of the National Right To Life Political Action Committee. According to the non-compliance standards contained in the Review and Referral Procedures, the committee has received and failed to return funds from their connected organization constituting the commingling of treasury and voluntary dollars (Chart #26), which requires additional examination by your office. For your information, on September 22, 1981 the Commission voted not to audit the committee.

If you have any questions, please contact Mark Kleinman at 357-0026.

Attachment

84040455263

REPORTS ANALYSIS REFERRAL  
TO  
OFFICE OF GENERAL COUNSEL

DATE: 22 October 1981

ANALYST: Mark Kleinman *M.K.*

I. COMMITTEE: National Right to Life Political Action Committee (C00111278)  
Phil Moran, Treasurer  
529 14th Street, N.W., Suite 341  
Washington, D.C. 20045

II. RELEVANT STATUTE: 2 U.S.C. 441b(a); 11 C.F.R. 114.5(b)

III. BACKGROUND:

A. Commingling of Treasury and Voluntary Dollars --- 2 U.S.C. 441b(a);  
11 C.F.R. 114.5(b)

1) October Quarterly Report

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National Right to Life Political Action Committee (C00111278)  
Reports Analysis Referral to Office of General Counsel

2) Year End Report

The committee's report disclosed a loan repayment of \$3,000 from its connected organization (Attachment #3). The committee had previously reported a \$9,000 loan to its connected organization. A Request For Additional Information was sent on April 30, 1981 (Attachment #7) and a Second Notice was sent on May 22, 1981 (Attachment #8) for failure to respond. On May 27, 1981, the committee called and was advised that a loan repayment had to be from permissible sources. The caller stated that, in that case, they would change this to a "reimbursement for administrative expenses" (Attachment #9). 1/ On June 2, 1981 the committee responded by changing this receipt to a "Reimbursement for Administrative Expenses." In addition, the response had indicated that they were advised by the Commission to change the receipt from a loan repayment to a reimbursement for administrative expenses (Attachment #10). On June 2, 1981, the committee called to determine if we had received their response, and what if anything, the Commission would do. The caller was advised that we had received their response and that we would review it closely. The caller was also advised that it was the committee which initiated this change and not through any advice of the Commission (Attachment #11).

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1/ See III, A(1) regarding Request for Guidance

IV. OTHER PENDING ACTIONS INITIATED BY RAD:

There are no outstanding Requests For Additional Information or matters requiring to be referred at this time.

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3

FEDERAL ELECTION COMMISSION  
COMMITTEE 40840459268 (77-80)

DATE 40CT81  
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
NATIONAL RIGHT TO LIFE POLITICAL ACTION COMMITTEE CONNECTED ORGANIZATION: RIGHT TO LIFE CMTE INC; NAT'L				NON-PARTY QUALIFIED		ID 9C00111278
1979	STATEMENT OF ORGANIZATION			12JUL79	4	79FEC/131/4718
	MISCELLANEOUS REPORT			13NOV79 TO FEC	3	79FEC/141/1172
	MISCELLANEOUS REPORT			14NOV79 TO FEC	3	79FEC/141/1789
	OCTOBER QUARTERLY			1JUL79 -30SEP79	2	79FEC/134/5210
	YEAR-END	50	0	14JUL79 -31DEC79	4	80FEC/148/2732
1980	STATEMENT OF ORGANIZATION - AMENDMENT			14JAN80	4	80FEC/144/3565
	MISCELLANEOUS REPORT			30JUL80 TO FEC	2	80FEC/142/4990
	24 HOUR CONTRIBUTION NOTICE			27OCT80	2	80FEC/173/3332
	APRIL QUARTERLY	5,249	2,299	1JAN80 -31MAR80	4	80FEC/153/4618
	JULY QUARTERLY	49,315	9,158	1APR80 -30JUN80	7	80FEC/163/0555
	JULY QUARTERLY - AMENDMENT	40,787	9,175	1APR80 -30JUN80	11	80FEC/164/2800
	JULY QUARTERLY - AMENDMENT	-	-	1APR80 -30JUN80	5	81FEC/190/4143
	OCTOBER QUARTERLY	29,748	57,425	1JUL80 -30SEP80	13	80FEC/168/2369
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL80 -30SEP80	3	80FEC/172/2905
	OCTOBER QUARTERLY - AMENDMENT	-	53,914	1JUL80 -30SEP80	3	81FEC/190/4131
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL80 -30SEP80	3	81FEC/193/1291
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL80 -30SEP80	1	81FEC/204/1882
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1JUL80 -30SEP80	3	81FEC/192/2404
	REQUEST FOR ADDITIONAL INFORMATION 2ND	-	-	1JUL80 -30SEP80	2	81FEC/201/3763
	PRE-GENERAL	34,407	17,512	1OCT80 -15OCT80	12	80FEC/172/1137
	PRE-GENERAL - AMENDMENT	-	-	1OCT80 -15OCT80	3	81FEC/190/4134
	PRE-GENERAL - AMENDMENT	-	-	1OCT80 -15OCT80	3	81FEC/194/4242
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1OCT80 -15OCT80	1	81FEC/195/1435
	POST-GENERAL	10,823	34,641	14OCT80 -24NOV80	29	80FEC/185/1903
	POST-GENERAL - AMENDMENT	-	36,642	16OCT80 -24NOV80	3	81FEC/190/4127
	POST-GENERAL - AMENDMENT	-	-	16OCT80 -24NOV80	3	81FEC/194/4234
	1'ST LETTER INFORMATIONAL NOTICE	-	-	16OCT80 -24NOV80	1	81FEC/195/1437
	YEAR-END	3,412	932	25NOV80 -31DEC80	6	81FEC/190/4137
	YEAR-END - AMENDMENT	-	-	25NOV80 -31DEC80	5	81FEC/194/4237
	YEAR-END - AMENDMENT	-	-	25NOV80 -31DEC80	2	81FEC/204/1496
	REQUEST FOR ADDITIONAL INFORMATION	-	-	25NOV80 -31DEC80	3	81FEC/195/1431
	REQUEST FOR ADDITIONAL INFORMATION 2ND	-	-	25NOV80 -31DEC80	4	81FEC/194/3581
	REQUEST FOR ADDITIONAL INFORMATION	-	-	25NOV80 -31DEC80	2	81FEC/201/3766
TOTAL		126,676	0 120,474	0	143	TOTAL PAGES

ALL REPORTS HAVE RECEIVED BASIC REVIEW.

ATTACHMENT #1

5

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
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NATIONAL RIGHT TO LIFE POLITICAL ACTION COMMITTEE  
 CONNECTED ORGANIZATION: RIGHT TO LIFE CMTE INC; NAT'L

NON-PARTY QUALIFIED

ID #C00111278

1981 STATEMENT OF ORGANIZATION - AMENDMENT  
 POST-RUN-OFF  
 MID-YEAR REPORT

6,890  
 276

7,714  
 4,044

15 JUL 81  
 1 JAN 81 - 11 MAY 81  
 12 MAY 81 - 31 JUL 81

2 81FEC/200/2012  
 9 81FEC/196/4225  
 8 81FEC/202/4785

TOTAL

7,166

0

11,780

0

19 TOTAL PAGES

ENDING CASH-ON-HAND (7/31/81) = \$1,587

DEBTS OWED TO = 9,000

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

Name of Committee (in Full)			
<b>NATIONAL RIGHT TO LIFE POLITICAL ACTION COMMITTEE</b>			
October Quarterly			
A. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)
National Right to Life Committee Suite 341, 529 14th Street, NW Washington, DC			7/31/80
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Reimbursement of Admin		Occupation	Amount of Each Receipt This Period
B. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Amount of Each Receipt This Period
C. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Amount of Each Receipt This Period
D. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Amount of Each Receipt This Period
E. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Amount of Each Receipt This Period
F. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Amount of Each Receipt This Period
G. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page (optional)			\$1,159.28
TOTAL This Period (last page this line number only)			1,159.28

31-000314A2575-7101211



## SCHEDULE A

## ITEMIZED RECEIPTS

Page 1 of 1  
 LINE NUMBER 11  
 This table is attached to the Summary Page

Any information coming from such Reports or Statements must not be used for the purpose of sending control orders or for carrying out business, other than as to the name and address of any person contributing to such contributions from such contributors.

Name of Committee for Public: **National Right to Life Political Action Committee** **Year End Report ML**

A. Full Name, Mailing Address and ZIP Code <b>National Right to Life Committee Suite 341, National Press Bldg. 329 14th Street, N. W. Washington, D.C. 20045</b>	Name of Employer <b>5-14-73 MK</b>	Date (month, day, year) <b>12-18-80</b>	Amount of Each Receipt This Period <b>3,000.00</b>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <b>Loan repayment</b>	Occupation	Aggregate Year-to-Date-\$	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$	
SUBTOTAL of Receipts This Period			
TOTAL This Period of Receipts			<b>3,000.00</b>

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

March 10, 1981

John Stanton, Treasurer  
National Right to Life  
Political Action Committee  
529 14th Street N.W., Suite 341  
Washington, DC 20045

Identification No: C00111278

Reference: October Quarterly Report (7/1/80 to 9/30/80) Q3

Dear Mr. Stanton:

This letter is prompted by the Commission's preliminary review of your October Quarterly Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

-Schedule A of your report (pertinent portion attached) discloses an apparent contribution from a corporation. You are advised that a contribution from a corporation is prohibited by 2 U.S.C. 441b, unless made from a separate segregated fund established by the corporation. If you have received a corporate contribution, the Commission recommends that you refund the full amount to the donor. (Any refund itemized on Schedule B should be reported on Line 26 of the Detailed Summary Page of your next report.) (Note: A sponsoring organization may pay for the administrative expenses of running its separate segregated fund. However, such payments may not be transferred into the separate segregate fund's account.)

If you should find, however, that the receipt in question is not corporate, but is from a partnership, an allocation of the contribution according to either (1) the partners' share of the profits or (2) an agreement among the partners, must be provided together with the identification of the partners. 11 C.F.R. 110.1(e).

If you find that the source of the contribution is permissible and was disclosed incorrectly or incompletely on your report, please amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of a prohibited contribution, your

CC  
21-2  
S.J.  
3-17-81  
CB  
3-19

John Stanton  
National Right to Life  
Political Action Committee

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prompt refund of the contribution to the donor will be taken into consideration by the Commission.

-You have listed in-kind contributions on Schedule B, Line 27. In-kind contributions to Federal candidates should be shown on Line 21 of the Detailed Summary Page and Schedule B accordingly.

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

*Mark Kleinman*

Mark Kleinman  
Reports Analyst  
Reports Analysis Division

31051922605  
84040155271

RECEIVED (10)

BRAMES, & HAYNES  
ATTORNEYS AT LAW  
800 SYCAMORE BUILDING  
15 SOUTH SIXTH STREET  
TERRE HAUTE, INDIANA 47807

81 MAR 27 11:57

ARNOLD H. BRAMES  
JAMES BOPP, JR.  
DAVID D. HAYNES

TELEPHONE  
(317) 236-2421

March 24, 1981

3X-A Q3

7-1-80 - 9-30-80

COO 111 278

Mr. Mark Kleinman, Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
1325 K Street, N. W.  
Washington, D. C. 20463

Re: Your Letter of March 10, 1981  
Reference: October Quarterly  
Report

Dear Mr. Kleinman:

As General Counsel for the National Right to Life Political Action Committee, your letter referred to above has been referred to me for response.

The itemized receipt which is the subject of your letter was a check on July 31, 1980, in the amount of \$1,159.28 from the National Right to Life Committee, Inc. The National Right to Life Committee, Inc. is the connected membership organization to its separate segregated fund the National Right to Life Political Action Committee. The receipt of July 31, 1980, was reimbursement for administrative expenses that had previously been expended by its PAC. Specifically, the first quarterly report for 1980 lists administrative expenses for the PAC in the amount of \$669.88. In the second quarterly report for 1980, the PAC incurred administrative expenses in the amount of \$2,675.31 for a total of \$3,818.68 for the first six months of 1980. On July 31, 1980, the National Right to Life Committee reimbursed part of those administrative expenses which is the receipt in question.

The Federal Election Law authorizes a connected membership organization to reimburse its separate segregated fund for administrative expenses paid by the PAC. For instance, in AO 1976-111, the Federal Election Commission advised a labor union that it may reimburse its PAC for administrative expenses paid by it, in that case specifically legal fees paid to establish the PAC. In AO 1979-33, a union reimbursed its PAC for a contribution made by the PAC to a non-partisan register and vote campaign since the contribution could have

May  
3-30-81

SL 3/30

LA  
3-31

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84040455272



Mr. Mark Kleinman  
March 24, 1981

Page Two

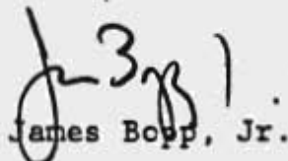
been made by the union. In AO 1979-72, the Federal Election Commission approved similar payments by the connected organization to its separate segregated fund.

In the instant case, the National Right to Life Committee, Inc. is reimbursing administrative expenses to the PAC which it could have paid directly. The administrative expenses reimbursed included legal work for the PAC, computer costs, list rentals and bank charges. Since each of these administrative costs could have been paid directly by the National Right to Life Committee, under the authority of the above referred to advisory opinions, the National Right to Life Committee may reimburse the PAC for these expenses.

As a result, there is no need to refund this amount or correct the reports.

Sincerely,

BRAMES, BOPP & HAYNES

  
James Bopp, Jr.

JB:maw

cc: Warren Sweeney  
John C. Willke  
John Stanton

810031031552273

(12)

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 20, 1981

## MEMORANDUM:

TO: CHARLES STEELE

THROUGH: B. ALLEN CLUTTER, III

FROM: JOHN GIBSON

SUBJECT: PRE-MUR --- NATIONAL RIGHT TO LIFE POLITICAL ACTION COMMITTEE  
REIMBURSEMENT FROM A SEPRATE SEGREGATED FUND'S CONNECTED  
ORGANIZATION FOR ADMINISTRATIVE EXPENSES.

During the normal course of business, the Reports Analysis Division has come across a matter for which we need your assistance.

The National Right To Life Political Action Committee (NRLPAC), the separate segregated fund of the National Right To Life Committee (NRL), accepted a reimbursement from its connected organization (NRL) for administrative expenses which NRLPAC had previously paid (Attachment #1). We sent a Request For Additional Information (Attachment #2), for a possible 2 U.S.C. 441b violation (corporate contribution), since NRL is incorporated. The committee's response (Attachment #3), however, referred to three (3) Advisory Opinions in which the Commission permitted a connected organization to reimburse its separate segregated fund (AO 1976-111 Attachment #4, AO 1979-33 Attachment #5, and AO 1979-72 Attachment #6).

In each case mentioned in the Advisory Opinions, there were apparent "mistakes" made by the committees involved, in paying for expenses which could have been paid for by their connected organization. In this case, while the committee (NRLPAC) did not state that they had made a mistake, it would appear that NRLPAC did not have to pay for these administrative expenses, as they could have been paid for by their connected organization (NRL) originally. (See 2 U.S.C. 441b(b)(2)(C) and 11 C.F.R. 114.1(b)(3))

Can NRLPAC accept a reimbursement for administrative expenses from its connected organization?

We would appreciate a response to this matter by May 25, 1981, so that we may follow-up with the appropriate action, in line with our deadlines for the Review and Referral Procedure.

prepared by: Mark Kleinman

84040455274



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 30, 1981

John Stanton, Treasurer  
National Right to Life  
Political Action Committee  
529 14th Street, N.W.  
Suite 341  
Washington, DC 20045

RQZ

Identification No: C0011278

Reference: Year End Report (11/25/80 to 12/31/80)

YE

Dear Mr. Stanton: ..

This letter is prompted by the Commission's preliminary review of your Year End Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

-Please clarify the source of funds for the entry on Schedule A, Line 14 from National Right to Life Committee (date of incorporation 5/14/73) for "loan repayment" (pertinent portion attached). You are advised that 11 C.F.R. 100.7(a)(1)(D) requires that loan repayments be made with funds "which are subject to the prohibitions of 11 C.F.R. 110.4(a) and Part 114" (no corporate funds).

If you have found that the loan repayment was made from funds which are not permissible under the Regulations, then you should refund the amount which is prohibited.

Although the Commission may take further legal steps concerning the acceptance of funds from a prohibited source, your prompt action with regards to this matter will be taken into consideration by the Commission.

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel

FC RAD  
5-5 5/6

84040455275  
31031951431



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 22, 1981

John Stanton, Treasurer  
National Right to Life  
Political Action Committee  
529 14th Street, N.W.  
Suite 341  
Washington, DC 20045

RQ3

Identification No: C00111278

Reference: Year End Report (11/25/80 - 12/31/80)

YC

Dear Mr. Stanton:

This letter is to inform you that as of this date, the Commission has not received your response to our request for additional information, dated April 30, 1981. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Mark Kleinman on our toll-free number (800)424-9530 or our local number (202)357-0026.

Sincerely,

*John D. Gibson*

John D. Gibson  
Acting Assist. Staff Director  
Reports Analysis Division

Enclosure

843014031933391  
455276

my 24-11-81  
AD 5/29



John Stanton  
National Right to Life  
Political Action Committee

2

15

free to contact me on our toll free number, (800) 424-9530. My local  
number is (202) 357-0026.

Sincerely,

*Mark Kleinman*

Mark Kleinman  
Reports Analyst  
Reports Analysis Division

8481031951432  
4040455277

(16)

TELECON TO THE FILE: NATIONAL RIGHT TO LIFE POLITICAL ACTION COMMITTEE  
FROM : MARK KLEINMAN  
DATE : 5-27-81

---

RE: Loan repayment from connected organization

---

I spoke with James Bopp, Attorney (812) 238-2421. I advised him of the problem of source of funds regarding a loan repayment. He stated that he would simply change it to a "Reimbursement for administrative expenses".\*\*

He will respond accordingly.

James Bopp, Attorney  
(812) 238-2421

\*\* Note: I am not in a position to advise the caller with regard to legality of the matter, since the Request for Guidance is in the Office of General Counsel waiting for a response.

84040155278



**NATIONAL  
LIGHT TO LIFE**

Lt. 341 National Press Bldg. - 579 14th Street, N.W. -  
Washington, D.C. 20045 - (202) 638-0930

**political action committee**

2 10:54

5-30-81

Dear Mr. Kleinman,

Please excuse our delay  
in responding to your note of 4-30-81

Enclosed are amendments to  
our reports. Per your advice we have  
changed the noted transactions from loan  
Repayments to reimbursements of administrative  
expense.

Thank you for your help.

J. P. Stanton  
Treas.

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

1. Name of Committee (in Full)

National Right to Life Political  
Action Committee

Address (Number and Street)

Suite 341, National Press Building  
529 14th Street, N. W.

City, State and ZIP Code

Washington, D. C. 20045

☐ Check if address is different than previously reported.

2. FEC Identification Number

C00111278

3. ☐ This committee qualified as a multicandidate com-

mittee during this Reporting Period on \_\_\_\_\_  
(date)

4. TYPE OF REPORT (check appropriate boxes)

- (a) ☐ April 15 Quarterly Report  
☐ July 15 Quarterly Report  
☐ October 15 Quarterly Report  
☒ January 31 Year End Report  
☐ July 31 Mid Year Report (Non-election Year Only)  
☐ Monthly Report for \_\_\_\_\_  
☐ Twelfth day report preceding \_\_\_\_\_  
(Type of Election)  
election on \_\_\_\_\_ in the State of \_\_\_\_\_  
☐ Thirtieth day report following the General Election  
on \_\_\_\_\_ in the State of \_\_\_\_\_  
☐ Termination Report

(b) Is this Report an Amendment?  
☒ YES ☐ NO

SUMMARY

5. Covering Period 11-25-80 Through 12-31-80

6. (a) Cash on Hand January 1, 1980

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

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

7. Total Disbursements (from Line 28)

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

9. Debts and Obligations Owed TO the Committee  
(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee  
(Itemize all on Schedule C or Schedule D)

Column A  
This Period

Column B  
Calendar Year-to-Date

\$	\$
\$	\$
\$	\$
\$	\$
\$	\$
\$	\$
\$ 9,000.00	
\$	

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

For further information, contact:

Federal Election Commission  
Toll Free 800-424-9530  
Local 202-523-4068

John Stanton

Type or Print Name of Treasurer

*John Stanton*

SIGNATURE OF TREASURER

5-27-81

Date

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

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

--	--	--	--	--	--	--	--	--

FEC FORM 3X (3/80)

8430140312337  
45280



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

19

Name of Committee (in Full)

**National Right to Life Political Action  
Committee**

Report Covering the Period

From: **11-25-80** to **12-31-80**

**I. RECEIPTS**

**11. CONTRIBUTIONS (other than loans) FROM:**

(a) Individuals/Persons Other Than Political Committees

(Memo Entry Unitemized \$ \_\_\_\_\_)

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)

**12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES**

**13. ALL LOANS RECEIVED**

**14. LOAN REPAYMENTS RECEIVED**

**15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)**

**16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES  
AND OTHER POLITICAL COMMITTEES**

**17. OTHER RECEIPTS (Dividends, Interest, etc.)**

**18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)**

**II. DISBURSEMENTS**

**19. OPERATING EXPENDITURES**

**20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES**

**21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND  
OTHER POLITICAL COMMITTEES**

**22. INDEPENDENT EXPENDITURES (Use Schedule E)**

**23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES  
(2 U.S.C. §441a(d)) (Use Schedule F)**

**24. LOAN REPAYMENTS MADE**

**25. LOANS MADE**

**26. REFUNDS OF CONTRIBUTIONS TO**

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)

**27. OTHER DISBURSEMENTS**

**28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)**

**III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES**

**29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d**

**30. TOTAL CONTRIBUTION REFUNDS from Line 26d**

**31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)**

**32. TOTAL OPERATING EXPENDITURES from Line 19**

**33. OFFSETS TO OPERATING EXPENDITURES from Line 15**

**34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)**

**COLUMN A  
Total This Period**

**COLUMN B  
Calendar Year-to-Date**

0.00

0.00

3,000.00

4,940.45

3,000.00

4,940.45

(2,077.01)

5,410.76

R 4304045528133

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

Name of Committee (in Full)

National Right to Life Political Action Committee

A. Full Name, Mailing Address and ZIP Code

National Right to Life Committee  
Suite 341, National Press Bldg.  
529 14th Street, N.W.  
Washington, D. C. 20045

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

Occupation

12-18-80

3,000.00

Receipt For:

☐ Primary

☐ General

Other (specify): Repayment of adminis-  
trative expense

Aggregate Year-to-Date-\$ 4,159.28

B. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

Occupation

Receipt For:

☐ Primary

☐ General

☐ Other (specify):

Aggregate Year-to-Date-\$

C. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

Occupation

Receipt For:

☐ Primary

☐ General

☐ Other (specify):

Aggregate Year-to-Date-\$

D. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

Occupation

Receipt For:

☐ Primary

☐ General

☐ Other (specify):

Aggregate Year-to-Date-\$

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

Occupation

Receipt For:

☐ Primary

☐ General

☐ Other (specify):

Aggregate Year-to-Date-\$

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

Occupation

Receipt For:

☐ Primary

☐ General

☐ Other (specify):

Aggregate Year-to-Date-\$

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

Occupation

Receipt For:

☐ Primary

☐ General

☐ Other (specify):

Aggregate Year-to-Date-\$

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

3,000.00

8 43014031334337

Name of Committee (in Full) <b>National Right to Life Political Action Committee</b>			
A. Full Name, Mailing Address and ZIP Code of Loan Source <b>National Right to Life Committee Suite 341, National Press Building 529 14th Street, N. W. Washington, D. C. 20045</b>		Original Amount of Loan <b>9,000.00</b>	Cumulative Payment To Date <b>0.00</b>
Election: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Balance Outstanding at Close of This Period <b>9,000.00</b>	
Terms: Date Incurred <b>10-16-80</b> Date Due <b>N/A</b> Interest Rate <b>0</b> % (apr)		<input type="checkbox"/> Secured	
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
B. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Cumulative Payment To Date
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Balance Outstanding at Close of This Period	
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr)		<input type="checkbox"/> Secured	
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
SUBTOTALS This Period This Page (optional) .....			
TOTALS This Period (last page in this line only) .....			<b>9,000.00</b>
Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.			

834103312341240  
455283



TELECON TO THE FILE: NATIONAL RIGHT TO LIFE POLITICAL ACTION COMMITTEE  
FROM : MARK KLEINMAN  
DATE : 6-2-81

-----  
RE: RESPONSE TO RFAI REGARDING LOAN REPAYMENT FROM CONNECTED ORGANIZATION  
-----

I spoke with John Stanton, Treasurer, who called (609) 829-4190. He asked if we had received the committee's response and what action, if any we might take.

I had seen the response and indicated that the letter which indicated that I had advised the attorney for the committee James Bopp to change the notation from "loan repayment" to "re-imbursement for Administrative Expenses" was incorrect. I explained to the caller, that it was Mr. Bopp who stated that he would change the notation from loan repayment to re-imbursement for Administrative Expenses. I did not advise the committee to change this.

I stated that we would have to look at the response closely.

John Stanton, Treasurer  
(609) 829-4190

84040155294





## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 6, 1981

MEMORANDUM

TO: John Gibson  
Acting Assistant Staff  
Director, RAD

THROUGH: B. Allen Clutter *AK*  
Staff Director

FROM: Charles N. Steele *CS*  
General Counsel

SUBJECT: Reimbursement from Separate Segregated Fund's  
Connected Organization for Administrative Expenses

8 4 0 4 0 1 5 2 8 5

This responds to your memorandum of April 20, 1981, in which you request guidance on a matter involving the National Right to Life Committee (NRC) and its separate segregated fund, the National Right to Life Political Action Committee (NRLPAC).

On July 31, 1980, NRLPAC accepted a reimbursement for administrative expenses from NRL in the amount of \$1,159.28. NRLPAC had previously paid this amount for legal work, computer costs, list rentals and bank charges. Because NRL is incorporated, a Request for Additional Information was sent to NRLPAC, citing a possible 2 U.S.C. §441b violation. In response to this request, counsel for NRLPAC referred to three Commission advisory opinions (AO 1976-111, AO 1979-33, and AO 1979-72) that he claims permit "a connected membership organization to reimburse its separate segregated fund for administrative expenses paid by the PAC." The issue here is whether this is a correct reading of these opinions and whether reimbursement of a political committee by its connected organization is permissible under the Act and regulations.

Under 2 U.S.C. § 441b(b)(2)(C), corporate funds may be used in the establishment and administration of, and the solicitation of contributions to, a separate segregated fund. These monies are not considered contributions or expenditures under the Act. 2 U.S.C. § 441b(b)(2); 11 C.F.R. § 114.1(a)(2)(iii). In order for such monies to be exempted, however, the corporation must either pay the administrative expenses directly or such monies must be segregated into an account separate from the PAC contributions account.

The Commission considered a matter involving this provision of the Act in MUR 1126. There, the Florida Medical Association (a corporation) had made a \$4,000 payment to the Florida Medical Political Action Committee for administration, staff education, and membership education. After the Commission found reason to believe that a violation had occurred, the \$4,000 was returned. Although no further action was taken, the Commission noted in its letters to the respondents that the original acceptance of the \$4,000 "constitute[d] commingling of funds in violation of the Act," and admonished the committee to "take immediate steps to insure that the type of activity that is the subject of this matter does not occur in the future."

Thus, while it is clear that under 2 U.S.C. § 441b and 11 C.F.R. § 114.5(b), NRL, as the connected organization, could have paid the administrative expenses in question directly, a connected organization is not permitted to simply reimburse its separate segregated fund for administrative expenses for which payment has already been made. Each of the advisory opinions cited by NRLPAC concerns itself with a situation in which an apparent "mistake" had been made and in which the original payment by the committees involved was inadvertent. In this matter, there is no indication of inadvertence on the part of NRLPAC in its payment of the administrative costs. In the absence of some showing that they were simply seeking to correct a mistake they had made, their reliance on the advisory opinions cited in their response is misplaced.

If this issue is later addressed in the context of a MUR, NRLPAC and NRL will have the opportunity to demonstrate that the original payment by NRLPAC was inadvertent. Short of some showing to that effect, it is the opinion of this Office that the reimbursement of NRLPAC by NRL for administrative expenses is not permitted.

84040455286



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 24, 1981

John Stanton, Treasurer  
National Right to Life  
Political Action Committee  
529 14th Street, N.W.  
Suite 341  
Washington, DC 20045

RQ3

Identification No: C0011278

Reference: October Quarterly Report (7/1/80-9/30/80)

Q3

Dear Mr. Stanton:

On March 10, 1981, you were notified that a review of your October Quarterly Report raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your March 27, 1981 response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required:

-Under 2 U.S.C. 441b(b)(2)(C), corporate funds may be used in the establishment and administration of, and the solicitation of contributions to, a separate segregated fund. These monies are not considered contributions or expenditures under the Act. 2 U.S.C. 441b(b)(2); 11 C.F.R. 114.1(a)(2)(iii). In order for such monies to be exempted, however, the corporation must either pay the administrative expenses directly or such monies must be segregated into an account separate from the contributions account.

-Although the Commission may take further legal steps concerning the acceptance of a prohibited contribution, your prompt refund of the contribution to the donor will be taken into consideration by the Commission. (Any refund itemized on Schedule B should be reported on Line 26 of the Detailed Summary Page of your next report.)

If this information is not received by the Commission within fifteen (15) days from the date of this notice, the Commission may choose to initiate legal action to ensure compliance with the Act.

8 40140312501238763

7-29-81 7-11/1m7/3A



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6103013764



(27)



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 24, 1981

John Stanton, Treasurer  
National Right to Life  
Political Action Committee  
529 14th Street, N.W.  
Suite 341  
Washington, DC 20045

RQZ

Identification No: C0011278

Reference: Year End Amendment (11-25-80 to 12-31-80)

YE

Dear Mr. Stanton: ..

This letter is prompted by the Commission's preliminary review of your Year End Amendment. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

-Schedule A of your report (pertinent portion attached) discloses an apparent contribution from a corporation. You are advised that a contribution from a corporation is prohibited by 2 U.S.C. 441b, unless made from a separate segregated fund established by the corporation. If you have received a corporate contribution, the Commission recommends that you refund the full amount to the donor. (Any refund itemized on Schedule B should be reported on Line 26 of the Detailed Summary Page of your next report.)

Under 2 U.S.C. 441b(b)(2)(C), corporate funds may be used in the establishment and administration of, and the solicitation of contributions to, a separate segregated fund. These monies are not considered contributions or expenditures under the Act. 2 U.S.C. 441b(b)(2); 11 C.F.R. 114.1(a)(2)(iii). In order for such monies to be exempted, however, the corporation must either pay the administrative expenses directly or such monies must be segregated into an account separate from the contributions account.

If you should find, however, that the receipt in question is not corporate, but is from a partnership, an allocation of the contribution according to either (1) the partners' share of the profits or (2) an agreement among the partners, must be provided together with the identification of the partners. 11 C.F.R. 110.1(e).

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729-161 100731

John Stanton  
National Right to Life  
Political Action Committee

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If you find that the source of the contribution is permissible and was disclosed incorrectly or incompletely on your report, please amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of a prohibited contribution, your prompt refund of the contribution to the donor will be taken into consideration by the Commission.

An amendment to your report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

*Mark Kleinman*

Mark Kleinman  
Reports Analyst  
Reports Analysis Division

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

29

BRAMES, BOPP, & HAYNES  
ATTORNEYS AT LAW  
800 SYCAMORE BUILDING  
18 SOUTH SIXTH STREET  
TERRE HAUTE, INDIANA 47807

ARNOLD H. BRAMES  
JAMES BOPP, JR.  
DAVID D. HAYNES

*Note Right to Life*

31 AUG 13 4:46

TELEPHONE  
(812) 238-2421

August 11, 1981

Mr. Mark Kleinman, Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
1325 K Street, N. W.  
Washington, D. C. 20463

COO 111 278

Re: Your letter of July 24, 1981,  
reference October, 1980 quarterly  
report and 1980 year end amendment

Dear Mr. Kleinman:

EX-A-YE

11-25-80 — 12-31-80

On July 24, 1981, you sent me two letters regarding the above entitled matter. In each case, these letters related to the reimbursement of administrative expenses by the National Right to Life Committee, Inc. to its connected PAC, the National Right to Life Political Action Committee. In each case, you asked for further information to justify the use of these corporate funds for NRLPAC. As General Counsel for the National Right to Life Committee and the National Right to Life Political Action Committee, I am making this response.

As you correctly point out in your letter, corporate funds may be used in the establishment and administration of, and the solicitation of contributions to, a separate segregated fund. In AO 1976-111 and AO 1979-33, the Federal Election Commission specifically permitted labor unions to reimburse its PAC for administrative expenses paid by it. In AO 1979-72, the Federal Election Commission approved similar payments by a connected organization to its separate segregated fund. In each case referred to in your letter, this was a reimbursement by the National Right to Life Committee to its PAC for administrative expenses. There is no requirement that the corporation must either pay the administrative expenses directly or such monies must be segregated into an account separate from the contributions account.

As a result, it is our position that these transfers were legal. If you have any other concerns regarding this matter, please let me know.

Sincerely,

BRAMES, BOPP & HAYNES

*[Signature]*

James Bopp, Jr.

JB:maw

CB 100  
8-17 8/21

255  
8-24

890400452919

REPORTS ANALYSIS REFERRAL UPDATE

\*ORIGIN: RAD

DATE MAY 19, 1982

ANALYST Mark Kleiman MK

TO: Office of General Counsel  
ATTENTION: Deborah Curry

TEAM CHIEF Mike Filler MF

THROUGH: STAFF DIRECTOR ✓

COMPLIANCE REVIEW B

FROM ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

MUR No. 1412

DATE OF ORIGINAL REFERRAL 10-22-81

\*\*PURPOSE:

INFORMATION:

ATTACHMENT #1

On the 30 Day Run-Off Report for 1981 (1-1-81 to 5-11-81), there is an additional \$6,000 receipt from National Right to Life Committee described as "Repayment of administrative expenses."

OUTCOME: (if applicable)

At this time, RAD does not intend to send a RFAI for this matter because it involves the same type of transaction as that which is the subject of MUR 1412.

\*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).

\*\*INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

84040455292



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

Name of Committee (in Full)

National Right to Life Political Action Committee

30 Day Run-Off MK

A. Full Name, Mailing Address and ZIP Code

National Right to Life Committee  
Suite 341, National Press Bldg.  
529 14th Street, N. W.  
Washington, D. C. 20045

Name of Employer

S-14-73 MK

Date (month, day, year)

2-27-81

Amount of Each Receipt This Period

6,000.00

Receipt For:

☐ Primary☐ General

Other (specify): Repayment of administrative expenses

Occupation

Aggregate Year-to-Date-\$ 6,000.00

B. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

Aggregate Year-to-Date-\$

Receipt For:

☐ Primary☐ General☐ Other (specify):

C. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

Aggregate Year-to-Date-\$

Receipt For:

☐ Primary☐ General☐ Other (specify):

D. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

Aggregate Year-to-Date-\$

Receipt For:

☐ Primary☐ General☐ Other (specify):

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

Aggregate Year-to-Date-\$

Receipt For:

☐ Primary☐ General☐ Other (specify):

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

Aggregate Year-to-Date-\$

Receipt For:

☐ Primary☐ General☐ Other (specify):

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

Aggregate Year-to-Date-\$

Receipt For:

☐ Primary☐ General☐ Other (specify):

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

6,000.00

**REPORTS ANALYSIS REFERRAL UPDATE**

**\*ORIGIN: RAD**

**DATE** MAY 19, 1982

**ANALYST** Mark Kleinman *MK*

**TO:** Office of General Counsel  
**ATTENTION:** Deborah Curry

**TEAM CHIEF** Mike Filler *MF*

**THROUGH:** **STAFF DIRECTOR** *[check]*

**COMPLIANCE REVIEW** B

**FROM** *[initials]* **ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS**

**MUR No.** 1412

**DATE OF ORIGINAL REFERRAL** 10-22-81

**\*\*PURPOSE:**

**INFORMATION:**

**ATTACHMENT #1**

On the 30 Day Run-Off Report for 1981 (1-1-81 to 5-11-81), there is an additional \$6,000 receipt from National Right to Life Committee described as "Repayment of administrative expenses."

**OUTCOME: (if applicable)**

At this time, RAD does not intend to send a RFAI for this matter because it involves the same type of transaction as that which is the subject of MUR 1412.

84040455294

\*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).  
\*\*INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

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

Name of Committee (in Full)

National Right to Life Political Action Committee

30 Day Run-off-MK

A. Full Name, Mailing Address and ZIP Code

National Right to Life Committee  
Suite 341, National Press Bldg.  
529 14th Street, N. W.  
Washington, D. C. 20045

Name of Employer

5-14-73  
MKDate (month,  
day, year)

2-27-81

Amount of Each  
Receipt this Period

6,000.00

Receipt For:

☐ Primary☐ General

X Other (specify): Repayment of adminis-

trative expenses

Occupation

Aggregate Year-to-Date-\$ 6,000.00

B. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)Amount of Each  
Receipt This Period

Occupation

Aggregate Year-to-Date-\$

Receipt For:

☐ Primary☐ General☐ Other (specify):

C. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)Amount of Each  
Receipt This Period

Occupation

Aggregate Year-to-Date-\$

Receipt For:

☐ Primary☐ General☐ Other (specify):

D. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)Amount of Each  
Receipt This Period

Occupation

Aggregate Year-to-Date-\$

Receipt For:

☐ Primary☐ General☐ Other (specify):

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)Amount of Each  
Receipt This Period

Occupation

Aggregate Year-to-Date-\$

Receipt For:

☐ Primary☐ General☐ Other (specify):

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)Amount of Each  
Receipt This Period

Occupation

Aggregate Year-to-Date-\$

Receipt For:

☐ Primary☐ General☐ Other (specify):

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)Amount of Each  
Receipt This Period

Occupation

Aggregate Year-to-Date-\$

Receipt For:

☐ Primary☐ General☐ Other (specify):

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

6,000.00

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

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
NATIONAL RIGHT TO LIFE POLITICAL ACTION COMMITTEE				NON-PARTY QUALIFIED		ID 4C00111278
CONNECTED ORGANIZATION: RIGHT TO LIFE CMTE INCL NAT'L						
1979	STATEMENT OF ORGANIZATION			12JUL79	4	79FEC/131/4718
	MISCELLANEOUS REPORT			13NOV79 TO FEC	3	79FEC/141/1172
	MISCELLANEOUS REPORT			14NOV79 TO FEC	3	79FEC/141/1789
	OCTOBER QUARTERLY			1JUL79 -30SEP79	2	79FEC/136/3210
	YEAR-END	50	0	14JUL79 -31DEC79	4	80FEC/148/2732
1980	STATEMENT OF ORGANIZATION - AMENDMENT			16JAN80	4	80FEC/144/3563
	MISCELLANEOUS REPORT			30JUL80 TO FEC	2	80FEC/162/4998
	24 HOUR CONTRIBUTION NOTICE			27OCT80	2	80FEC/173/3332
	APRIL QUARTERLY	5,249	2,299	1JAN80 -31MAR80	6	80FEC/153/4418
	JULY QUARTERLY	49,315	9,158	1APR80 -30JUN80	7	80FEC/163/0553
	JULY QUARTERLY - AMENDMENT	40,787	9,175	1APR80 -30JUN80	11	80FEC/164/2800
	JULY QUARTERLY - AMENDMENT	-	-	1APR80 -30JUN80	5	81FEC/190/4143
	OCTOBER QUARTERLY	29,748	57,425	1JUL80 -30SEP80	15	80FEC/168/2569
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL80 -30SEP80	3	80FEC/172/2905
	OCTOBER QUARTERLY - AMENDMENT	-	53,914	1JUL80 -30SEP80	3	81FEC/190/4131
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL80 -30SEP80	3	81FEC/193/1291
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL80 -30SEP80	1	81FEC/204/1882
	REQUEST FOR ADDITIONAL INFORMATION			1JUL80 -30SEP80	3	81FEC/192/2604
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL80 -30SEP80	2	81FEC/201/3763
	PRE-GENERAL	36,607	17,512	1OCT80 -15OCT80	12	80FEC/172/1137
	PRE-GENERAL - AMENDMENT	-	-	1OCT80 -15OCT80	3	81FEC/190/4134
	PRE-GENERAL - AMENDMENT	-	-	1OCT80 -15OCT80	3	81FEC/196/4242
	REQUEST FOR ADDITIONAL INFORMATION			1OCT80 -15OCT80	1	81FEC/195/1435
	POST-GENERAL	10,823	34,641	16OCT80 -24NOV80	29	80FEC/185/1903
	POST-GENERAL - AMENDMENT	-	34,642	16OCT80 -24NOV80	3	81FEC/190/4127
	POST-GENERAL - AMENDMENT	-	-	16OCT80 -24NOV80	3	81FEC/196/4234
	1ST LETTER INFORMATIONAL NOTICE			16OCT80 -24NOV80	1	81FEC/195/1437
	YEAR-END	3,412	932	25NOV80 -31DEC80	6	81FEC/190/4137
	YEAR-END - AMENDMENT	-	-	25NOV80 -31DEC80	5	81FEC/196/4237
	YEAR-END - AMENDMENT	-	-	25NOV80 -31DEC80	2	81FEC/204/1494
	REQUEST FOR ADDITIONAL INFORMATION			25NOV80 -31DEC80	3	81FEC/195/1431
	REQUEST FOR ADDITIONAL INFORMATION 2ND			25NOV80 -31DEC80	4	81FEC/196/3581
	REQUEST FOR ADDITIONAL INFORMATION			25NOV80 -31DEC80	2	81FEC/201/3766
TOTAL		126,676	0 120,474	0	162	TOTAL PAGES

ALL REPORTS HAVE RECEIVED BASIC REVIEW.

ATTACHMENT #1



NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
NATIONAL RIGHT TO LIFE POITICAL ACTION COMMITTEE				NON-PARTY QUALIFIED		ID 4C00111270
CONNECTED ORGANIZATION: RIGHT TO LIFE CMTE INC; NAT'L						
1981 STATEMENT OF ORGANIZATION - AMENDMENT				15JUL81	2	81FEC/200/2012
POST-RUN-OFF	6,890	7,714		1JAN81 -11MAY81	9	81FEC/194/4225
MID-YEAR REPORT	276	4,066		12MAY81 -31JUL81	8	81FEC/202/4705
TOTAL	7,166	0	11,780	0	19	TOTAL PAGES

ENDING CASH-ON-HAND (7/31/81) = \$1,587

DEBTS OWED TO = 9,000

Name of Committee (in Full)

October Quarterly

A. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
National Right to Life Committee Suite 341, 529 14th Street, NW Washington, DC			7/31/80	\$1,159.28
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify): Reimbursement of Admin Expenses		Occupation	Aggregate Year-to-Date-\$	
B. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
		Occupation	Aggregate Year-to-Date-\$	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):				
C. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
		Occupation	Aggregate Year-to-Date-\$	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):				
D. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
		Occupation	Aggregate Year-to-Date-\$	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):				
E. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
		Occupation	Aggregate Year-to-Date-\$	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):				
F. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
		Occupation	Aggregate Year-to-Date-\$	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):				
G. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
		Occupation	Aggregate Year-to-Date-\$	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):				
SUBTOTAL of Receipts This Page (optional)				\$1,159.28
TOTAL This Period (last page this line number only)				1,159.28

## SCHEDULE A

## ITEMIZED RECEIPTS

Page 1 of 1  
 LINE NUMBER 11  
 (Use separate schedules for each category of the Disposed Summary Page)

Any information received from such Reports or Statements must be provided to the donor for the purpose of providing correct amounts for the contribution or deduction, other than using the name and address of any individual contributing to such contributions from such committees.

Name of Committee (in Full)  
**National Right to Life Political Action Committee** *Year End Report*

A. Full Name, Mailing Address and ZIP Code  
**National Right to Life Committee  
 Suite 341, National Press Bldg.  
 329 14th Street, N. W.  
 Washington, D.C. 20045**

Name of Employer  
**5-14-73 MK**

Date (month, day, year)  
**12-18-80**

Amount of Each Receipt for the Period  
**3,000.00**

Receipt For: ☐ Primary ☐ General  
☒ Other (specify): **Loan repayment**

Description  
**Aggressive Year-to-Date-S**

B. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt for the Period

Receipt For: ☐ Primary ☐ General  
☐ Other (specify):

Description

Aggressive Year-to-Date-S

C. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt for the Period

Receipt For: ☐ Primary ☐ General  
☐ Other (specify):

Description

Aggressive Year-to-Date-S

D. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt for the Period

Receipt For: ☐ Primary ☐ General  
☐ Other (specify):

Description

Aggressive Year-to-Date-S

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt for the Period

Receipt For: ☐ Primary ☐ General  
☐ Other (specify):

Description

Aggressive Year-to-Date-S

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt for the Period

Receipt For: ☐ Primary ☐ General  
☐ Other (specify):

Description

Aggressive Year-to-Date-S

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt for the Period

Receipt For: ☐ Primary ☐ General  
☐ Other (specify):

Description

Aggressive Year-to-Date-S

SUBTOTAL of Receipts for the Period

TOTAL for the Period (at base rate) **3,000.00**

00693195143



R42



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

March 10, 1981

John Stanton, Treasurer  
National Right to Life  
Political Action Committee  
529 14th Street N.W., Suite 341  
Washington, DC 20045

Identification No: C00111278

Reference: October Quarterly Report (7/1/80 to 9/30/80) Q3

Dear Mr. Stanton:

This letter is prompted by the Commission's preliminary review of your October Quarterly Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

-Schedule A of your report (pertinent portion attached) discloses an apparent contribution from a corporation. You are advised that a contribution from a corporation is prohibited by 2 U.S.C. 441b, unless made from a separate segregated fund established by the corporation. If you have received a corporate contribution, the Commission recommends that you refund the full amount to the donor. (Any refund itemized on Schedule B should be reported on Line 26 of the Detailed Summary Page of your next report.) (Note: A sponsoring organization may pay for the administrative expenses of running its separate segregated fund. However, such payments may not be transferred into the separate segregate fund's account.)

If you should find, however, that the receipt in question is not corporate, but is from a partnership, an allocation of the contribution according to either (1) the partners' share of the profits or (2) an agreement among the partners, must be provided together with the identification of the partners. 11 C.F.R. 110.1(e).

If you find that the source of the contribution is permissible and was disclosed incorrectly or incompletely on your report, please amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of a prohibited contribution, your

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cc 2  
3-17-81  
CB  
3-19



John Stanton  
National Right to Life  
Political Action Committee

2

prompt refund of the contribution to the donor will be taken into consideration by the Commission.

-You have listed in-kind contributions on Schedule B, Line 27. In-kind contributions to Federal candidates should be shown on Line 21 of the Detailed Summary Page and Schedule B accordingly.

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

*Mark Kleinman*

Mark Kleinman  
Reports Analyst  
Reports Analysis Division

31031922605  
84040155301

RECEIVED

BRAMES, & HAYNES  
ATTORNEYS AT LAW  
800 SYCAMORE BUILDING  
18 SOUTH SIXTH STREET  
TERRE HAUTE, INDIANA 47807

ARNOLD H. BRAMES  
JAMES BOPP, JR.  
DAVID D. HAYNES

81 MAR 27 AM 11:57

TELEPHONE  
(812) 238-2421

March 24, 1981

Mr. Mark Kleinman, Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
1325 K Street, N. W.  
Washington, D. C. 20463

3X-A Q3

7-1-80 - 9-30-80

COO 111 278

Re: Your Letter of March 10, 1981  
Reference: October Quarterly  
Report

Dear Mr. Kleinman:

As General Counsel for the National Right to Life Political Action Committee, your letter referred to above has been referred to me for response.

The itemized receipt which is the subject of your letter was a check on July 31, 1980, in the amount of \$1,159.28 from the National Right to Life Committee, Inc. The National Right to Life Committee, Inc. is the connected membership organization to its separate segregated fund the National Right to Life Political Action Committee. The receipt of July 31, 1980, was reimbursement for administrative expenses that had previously been expended by its PAC. Specifically, the first quarterly report for 1980 lists administrative expenses for the PAC in the amount of \$669.88. In the second quarterly report for 1980, the PAC incurred administrative expenses in the amount of \$2,675.31 for a total of \$3,818.68 for the first six months of 1980. On July 31, 1980, the National Right to Life Committee reimbursed part of those administrative expenses which is the receipt in question.

The Federal Election Law authorizes a connected membership organization to reimburse its separate segregated fund for administrative expenses paid by the PAC. For instance, in AO 1976-111, the Federal Election Commission advised a labor union that it may reimburse its PAC for administrative expenses paid by it, in that case specifically legal fees paid to establish the PAC. In AO 1979-33, a union reimbursed its PAC for a contribution made by the PAC to a non-partisan register and vote campaign since the contribution could have

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May 3-30-81

JL 3/30

20 3/31

Mr. Mark Kleinman  
March 24, 1981

Page Two

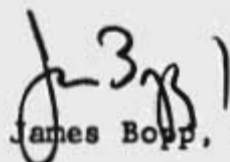
been made by the union. In AO 1979-72, the Federal Election Commission approved similar payments by the connected organization to its separate segregated fund.

In the instant case, the National Right to Life Committee, Inc. is reimbursing administrative expenses to the PAC which it could have paid directly. The administrative expenses reimbursed included legal work for the PAC, computer costs, list rentals and bank charges. Since each of these administrative costs could have been paid directly by the National Right to Life Committee, under the authority of the above referred to advisory opinions, the National Right to Life Committee may reimburse the PAC for these expenses.

As a result, there is no need to refund this amount or correct the reports.

Sincerely,

BRAMES, BOPP & HAYNES

  
James Bopp, Jr.

JB:maw

cc: Warren Sweeney  
John C. Willke  
John Stanton

840346935303



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 20, 1981

MEMORANDUM:

TO: CHARLES STEELE

THROUGH: B. ALLEN CLUTTER, III

FROM: JOHN GIBSON

SUBJECT: PRE-MUR --- NATIONAL RIGHT TO LIFE POLITICAL ACTION COMMITTEE  
REIMBURSEMENT FROM A SEPRATE SEGREGATED FUND'S CONNECTED  
ORGANIZATION FOR ADMINISTRATIVE EXPENSES.

During the normal course of business, the Reports Analysis Division has come across a matter for which we need your assistance.

The National Right To Life Political Action Committee (NRLPAC), the separate segregated fund of the National Right To Life Committee (NRL), accepted a reimbursement from its connected organization (NRL) for administrative expenses which NRLPAC had previously paid (Attachment #1). We sent a Request For Additional Information (Attachment #2), for a possible 2 U.S.C. 441b violation (corporate contribution), since NRL is incorporated. The committee's response (Attachment #3), however, referred to three (3) Advisory Opinions in which the Commission permitted a connected organization to reimburse its separate segregated fund (AO 1976-111 Attachment #4, AO 1979-33 Attachment #5, and AO 1979-72 Attachment #6).

In each case mentioned in the Advisory Opinions, there were apparent "mistakes" made by the committees involved, in paying for expenses which could have been paid for by their connected organization. In this case, while the committee (NRLPAC) did not state that they had made a mistake, it would appear that NRLPAC did not have to pay for these administrative expenses, as they could have been paid for by their connected organization (NRL) originally. (See 2 U.S.C. 441b(b)(2)(C) and 11 C.F.R. 114.1(b)(3))

Can NRLPAC accept a reimbursement for administrative expenses from its connected organization?

We would appreciate a response to this matter by May 25, 1981, so that we may follow-up with the appropriate action, in line with our deadlines for the Review and Referral Procedure.

prepared by: Mark Kleinman

8404045304





## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 30, 1981

John Stanton, Treasurer  
National Right to Life  
Political Action Committee  
529 14th Street, N.W.  
Suite 341  
Washington, DC 20045

RQZ

Identification No: C00111278

Reference: Year End Report (11/25/80 to 12/31/80)

YE

Dear Mr. Stanton: ..

This letter is prompted by the Commission's preliminary review of your Year End Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

-Please clarify the source of funds for the entry on Schedule A, Line 14 from National Right to Life Committee (date of incorporation 5/14/73) for "loan repayment" (pertinent portion attached). You are advised that 11 C.F.R. 100.7(a)(1)(D) requires that loan repayments be made with funds "which are subject to the prohibitions of 11 C.F.R. 110.4(a) and Part 114" (no corporate funds).

If you have found that the loan repayment was made from funds which are not permissible under the Regulations, then you should refund the amount which is prohibited.

Although the Commission may take further legal steps concerning the acceptance of funds from a prohibited source, your prompt action with regards to this matter will be taken into consideration by the Commission.

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel

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FC  
5-5-81  
RAD  
5/6



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 22, 1981

John Stanton, Treasurer  
National Right to Life  
Political Action Committee  
529 14th Street, N.W.  
Suite 341  
Washington, DC 20045

RQ3

Identification No: C00111278

Reference: Year End Report (11/25/80 - 12/31/80)

YE

Dear Mr. Stanton:

This letter is to inform you that as of this date, the Commission has not received your response to our request for additional information, dated April 30, 1981. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Mark Kleinman on our toll-free number (800)424-9530 or our local number (202)357-0026.

Sincerely,

*John D. Gibson*

John D. Gibson  
Acting Assist. Staff Director  
Reports Analysis Division

Enclosure

8 430147034153330631

my  
2/29

AD 6/29

John Stanton  
National Right to Life  
Political Action Committee

2

free to contact me on our toll free number, (800) 424-9530. My local  
number is (202) 357-0026.

Sincerely,

*Mark Kleinman*

Mark Kleinman  
Reports Analyst  
Reports Analysis Division

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

TELECON TO THE FILE: NATIONAL RIGHT TO LIFE POLITICAL ACTION COMMITTEE

FROM : MARK KLEINMAN

DATE : 5-27-81

-----  
RE: Loan repayment from connected organization  
-----

I spoke with James Bopp, Attorney (812) 238-2421. I advised him of the problem of source of funds regarding a loan repayment. He stated that he would simply change it to a "Reimbursement for administrative expenses".\*\*

He will respond accordingly.

James Bopp, Attorney  
(812) 238-2421

\*\* Note: I am not in a position to advise the caller with regard to legality of the matter, since the Request for Guidance is in the Office of General Counsel waiting for a response.

84040455308





**National  
RIGHT TO LIFE**

**political action committee**

5, 10 341 National Press Bldg - 529 14th Street, N.W. -  
Washington D.C. 20045 - (202) 528-8836

2-11-81 2-11-81 2-11-81

5-30-81

Dear Mr Kleinman,

Please excuse our delay  
in responding to your note of 4-30-81

Enclosed are amendments to  
our reports. Per your advice we have  
changed the noted transactions from loan  
Repayments to reimbursements of administrative  
expense.

Thank you for your help.

J. P. Stanton  
Treas.

840404  
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530404  
530404  
530404

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

(Summary)

**RECEIVED**

81 JUN 2 P 1:55

**1. Name of Committee (in Full)**

National Right to Life Political  
Action Committee

**Address (Number and Street)**

Suite 341, National Press Building  
529 14th Street, N. W.

**City, State and ZIP Code**

Washington, D. C. 20045

☐ Check if address is different than previously reported.

**2. FEC Identification Number**

C00111278

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_ (date)

**4. TYPE OF REPORT (check appropriate boxes)**

- (a) ☐ April 15 Quarterly Report  
☐ July 15 Quarterly Report  
☐ October 15 Quarterly Report  
☒ January 31 Year End Report  
☐ July 31 Mid Year Report (Non-election Year Only)  
☐ Monthly Report for \_\_\_\_\_  
☐ Twelfth day report preceding \_\_\_\_\_ (Type of Election)  
election on \_\_\_\_\_ in the State of \_\_\_\_\_  
☐ Thirtieth day report following the General Election  
on \_\_\_\_\_ in the State of \_\_\_\_\_  
☐ Termination Report

(b) Is this Report an Amendment?  
☒ YES ☐ NO

**SUMMARY**

5. Covering Period 11-25-80 Through 12-31-80  
6. (a) Cash on Hand January 1, 1980 .....  
(b) Cash on Hand at Beginning of Reporting Period .....  
(c) Total Receipts (from Line 18) .....  
(d) Subtotal (add lines 6(b) and 6(c) for Column A and  
lines 6(a) and 6(c) for Column B) .....  
7. Total Disbursements (from Line 28) .....  
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) .....  
9. Debts and Obligations Owed TO the Committee  
(Itemize all on Schedule C or Schedule D) .....  
10. Debts and Obligations Owed BY the Committee  
(Itemize all on Schedule C or Schedule D) .....

Column A This Period	Column B Calendar Year-to-Date
	\$
\$	
\$	\$
\$	\$
\$	\$
\$	\$
\$ 9,000.00	
\$	

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

For further information, contact:

Federal Election Commission  
Toll Free 800-424-9530  
Local 202-523-4068

**John Stanton**

Type or Print Name of Treasurer

*John Stanton*

SIGNATURE OF TREASURER

5-27-81

Date

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

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

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FEC FORM 3X (3/80)

R 43014703415312037

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

Name of Committee (in Full) <b>National Right to Life Political Action Committee</b>	Report Covering the Period: From <b>11-25-80</b> to <b>12-31-80</b>	
	<b>COLUMN A Total This Period</b>	<b>COLUMN B Calendar Year-to-Date</b>
<b>I. RECEIPTS</b>		
<b>11. CONTRIBUTIONS (other than loans) FROM:</b>		
(a) Individuals/Persons Other Than Political Committees .....		
(Memo Entry Unitemized \$ ..... )		
(b) Political Party Committees .....		
(c) Other Political Committees .....		
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c) .....		
<b>12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES</b> .....		
<b>13. ALL LOANS RECEIVED</b> .....		
<b>14. LOAN REPAYMENTS RECEIVED</b> .....	0.00	0.00
<b>15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)</b> .....	3,000.00	4,940.45
<b>16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b> .....		
<b>17. OTHER RECEIPTS (Dividends, Interest, etc.)</b> .....		
<b>18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)</b> .....		
<b>II. DISBURSEMENTS</b>		
<b>19. OPERATING EXPENDITURES</b> .....		
<b>20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES</b> .....		
<b>21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b> .....		
<b>22. INDEPENDENT EXPENDITURES (Use Schedule E)</b> .....		
<b>23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F)</b> .....		
<b>24. LOAN REPAYMENTS MADE</b> .....		
<b>25. LOANS MADE</b> .....		
<b>26. REFUNDS OF CONTRIBUTIONS TO</b>		
(a) Individuals/Persons Other Than Political Committees .....		
(b) Political Party Committees .....		
(c) Other Political Committees .....		
(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c) .....		
<b>27. OTHER DISBURSEMENTS</b> .....		
<b>28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)</b> .....		
<b>III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES</b>		
<b>29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d</b> .....		
<b>30. TOTAL CONTRIBUTION REFUNDS from Line 26d</b> .....		
<b>31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)</b> .....		
<b>32. TOTAL OPERATING EXPENDITURES from Line 19</b> .....		
<b>33. OFFSETS TO OPERATING EXPENDITURES from Line 15</b> .....	3,000.00	4,940.45
<b>34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)</b> .....	(2,077.01)	5,410.76

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

Name of Committee (in Full)

National Right to Life Political Action Committee

A. Full Name, Mailing Address and ZIP Code

National Right to Life Committee  
Suite 341, National Press Bldg.  
529 14th Street, N.W.  
Washington, D. C. 20045

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt this Period

Occupation

12-18-80

3,000.00

Receipt For:

☐ Primary

☐ General

Other (specify): Repayment of adminis-  
trative expense

Aggregate Year-to-Date-\$ 4,159.28

B. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

Occupation

Receipt For:

☐ Primary

☐ General

☐ Other (specify):

Aggregate Year-to-Date-\$

C. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

Occupation

Receipt For:

☐ Primary

☐ General

☐ Other (specify):

Aggregate Year-to-Date-\$

D. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

Occupation

Receipt For:

☐ Primary

☐ General

☐ Other (specify):

Aggregate Year-to-Date-\$

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

Occupation

Receipt For:

☐ Primary

☐ General

☐ Other (specify):

Aggregate Year-to-Date-\$

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

Occupation

Receipt For:

☐ Primary

☐ General

☐ Other (specify):

Aggregate Year-to-Date-\$

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

Occupation

Receipt For:

☐ Primary

☐ General

☐ Other (specify):

Aggregate Year-to-Date-\$

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

3,000.00

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<b>Name of Committee (in Full)</b> <b>National Right to Life Political Action Committee</b>			
<b>A. Full Name, Mailing Address and ZIP Code of Loan Source</b> <b>National Right to Life Committee</b> <b>Suite 341, National Press Building</b> <b>529 14th Street, N. W.</b> <b>Washington, D. C. 20045</b> Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Original Amount of Loan</b>  <div style="font-size: 1.2em;">9,000.00</div>	<b>Cumulative Payment To Date</b>  <div style="font-size: 1.2em;">0.00</div>	<b>Balance Outstanding at Close of This Period</b>  <div style="font-size: 1.2em;">9,000.00</div>
Terms: Date Incurred <u>10-16-80</u> Date Due <u>N/A</u> Interest Rate <u>0</u> %(apr) <input type="checkbox"/> Secured			
<b>List All Endorsers or Guarantors (if any) to Item A</b>			
<b>1. Full Name, Mailing Address and ZIP Code</b>	<b>Name of Employer</b>  <b>Occupation</b>  <b>Amount Guaranteed Outstanding:</b> <div style="font-size: 1.2em;">\$</div>		
<b>2. Full Name, Mailing Address and ZIP Code</b>	<b>Name of Employer</b>  <b>Occupation</b>  <b>Amount Guaranteed Outstanding:</b> <div style="font-size: 1.2em;">\$</div>		
<b>3. Full Name, Mailing Address and ZIP Code</b>	<b>Name of Employer</b>  <b>Occupation</b>  <b>Amount Guaranteed Outstanding:</b> <div style="font-size: 1.2em;">\$</div>		
<b>B. Full Name, Mailing Address and ZIP Code of Loan Source</b>			
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ %(apr) <input type="checkbox"/> Secured			
<b>List All Endorsers or Guarantors (if any) to Item B</b>			
<b>1. Full Name, Mailing Address and ZIP Code</b>	<b>Name of Employer</b>  <b>Occupation</b>  <b>Amount Guaranteed Outstanding:</b> <div style="font-size: 1.2em;">\$</div>		
<b>2. Full Name, Mailing Address and ZIP Code</b>	<b>Name of Employer</b>  <b>Occupation</b>  <b>Amount Guaranteed Outstanding:</b> <div style="font-size: 1.2em;">\$</div>		
<b>3. Full Name, Mailing Address and ZIP Code</b>	<b>Name of Employer</b>  <b>Occupation</b>  <b>Amount Guaranteed Outstanding:</b> <div style="font-size: 1.2em;">\$</div>		
<b>SUBTOTALS This Period This Page (optional) . . . . .</b>			
<b>TOTALS This Period (last page in this line only) . . . . .</b>			
			9,000.00
Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.			

83410243014253130

TELECON TO THE FILE: NATIONAL RIGHT TO LIFE POLITICAL ACTION COMMITTEE  
FROM : MARK KLEINMAN  
DATE : 6-2-81

-----  
RE: RESPONSE TO RFAI REGARDING LOAN REPAYMENT FROM CONNECTED ORGANIZATION  
-----

I spoke with John Stanton, Treasurer, who called (609) 829-4190. He asked if we had received the committee's response and what action, if any we might take.

I had seen the response and indicated that the letter which indicated that I had advised the attorney for the committee James Bopp to change the notation from "loan repayment" to "re-imbursement for Administrative Expenses" was incorrect. I explained to the caller, that it was Mr. Bopp who stated that he would change the notation from loan repayment to re-imbursement for Administrative Expenses. I did not advise the committee to change this.

I stated that we would have to look at the response closely.

John Stanton, Treasurer  
(609) 829-4190

84040455314



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 6, 1981

MEMORANDUM

TO: John Gibson  
Acting Assistant Staff  
Director, RAD

THROUGH: B. Allen Clutter *BA*  
Staff Director

FROM: Charles N. Steele *CS*  
General Counsel

SUBJECT: Reimbursement from Separate Segregated Fund's  
Connected Organization for Administrative Expenses

This responds to your memorandum of April 20, 1981, in which you request guidance on a matter involving the National Right to Life Committee (NRC) and its separate segregated fund, the National Right to Life Political Action Committee (NRLPAC).

On July 31, 1980, NRLPAC accepted a reimbursement for administrative expenses from NRL in the amount of \$1,159.28. NRLPAC had previously paid this amount for legal work, computer costs, list rentals and bank charges. Because NRL is incorporated, a Request for Additional Information was sent to NRLPAC, citing a possible 2 U.S.C. § 441b violation. In response to this request, counsel for NRLPAC referred to three Commission advisory opinions (AO 1976-111, AO 1979-33, and AO 1979-72) that he claims permit "a connected membership organization to reimburse its separate segregated fund for administrative expenses paid by the PAC." The issue here is whether this is a correct reading of these opinions and whether reimbursement of a political committee by its connected organization is permissible under the Act and regulations.

Under 2 U.S.C. § 441b(b)(2)(C), corporate funds may be used in the establishment and administration of, and the solicitation of contributions to, a separate segregated fund. These monies are not considered contributions or expenditures under the Act. 2 U.S.C. § 441b(b)(2); 11 C.F.R. § 114.1(a)(2)(iii). In order for such monies to be exempted, however, the corporation must either pay the administrative expenses directly or such monies must be segregated into an account separate from the PAC contributions account.



The Commission considered a matter involving this provision of the Act in MUR 1126. There, the Florida Medical Association (a corporation) had made a \$4,000 payment to the Florida Medical Political Action Committee for administration, staff education, and membership education. After the Commission found reason to believe that a violation had occurred, the \$4,000 was returned. Although no further action was taken, the Commission noted in its letters to the respondents that the original acceptance of the \$4,000 "constitute[d] commingling of funds in violation of the Act," and admonished the committee to "take immediate steps to insure that the type of activity that is the subject of this matter does not occur in the future."

Thus, while it is clear that under 2 U.S.C. § 441b and 11 C.F.R. § 114.5(b), NRL, as the connected organization, could have paid the administrative expenses in question directly, a connected organization is not permitted to simply reimburse its separate segregated fund for administrative expenses for which payment has already been made. Each of the advisory opinions cited by NRLPAC concerns itself with a situation in which an apparent "mistake" had been made and in which the original payment by the committees involved was inadvertent. In this matter, there is no indication of inadvertence on the part of NRLPAC in its payment of the administrative costs. In the absence of some showing that they were simply seeking to correct a mistake they had made, their reliance on the advisory opinions cited in their response is misplaced.

If this issue is later addressed in the context of a MUR, NRLPAC and NRL will have the opportunity to demonstrate that the original payment by NRLPAC was inadvertent. Short of some showing to that effect, it is the opinion of this Office that the reimbursement of NRLPAC by NRL for administrative expenses is not permitted.

84040455316





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 24, 1981

John Stanton, Treasurer  
National Right to Life  
Political Action Committee  
529 14th Street, N.W.  
Suite 341  
Washington, DC 20045

RQ3

Identification No: C00111278

Reference: October Quarterly Report (7/1/80-9/30/80)

Q3

Dear Mr. Stanton:

On March 10, 1981, you were notified that a review of your October Quarterly Report raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your March 27, 1981 response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required:

-Under 2 U.S.C. 441b(b)(2)(C), corporate funds may be used in the establishment and administration of, and the solicitation of contributions to, a separate segregated fund. These monies are not considered contributions or expenditures under the Act. 2 U.S.C. 441b(b)(2); 11 C.F.R. 114.1(a)(2)(iii). In order for such monies to be exempted, however, the corporation must either pay the administrative expenses directly or such monies must be segregated into an account separate from the contributions account.

-Although the Commission may take further legal steps concerning the acceptance of a prohibited contribution, your prompt refund of the contribution to the donor will be taken into consideration by the Commission. (Any refund itemized on Schedule B should be reported on Line 26 of the Detailed Summary Page of your next report.)

If this information is not received by the Commission within fifteen (15) days from the date of this notice, the Commission may choose to initiate legal action to ensure compliance with the Act.

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7-29-81 7-11/1m7/3A

John Stanton  
National Right to Life  
Political Action Committee

2

July 24, 1981

If you should have any questions related to this matter, please contact Mark Kleinman on our toll-free number (800)424-9530 or our local number (202)357-0026.

Sincerely,

*John D. Gibson*

John D. Gibson  
Acting Assist. Staff Director  
Reports Analysis Division

848014203425131378



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 24, 1981

John Stanton, Treasurer  
National Right to Life  
Political Action Committee  
529 14th Street, N.W.  
Suite 341  
Washington, DC 20045

Identification No: C0011278

Reference: Year End Amendment (11-25-80 to 12-31-80)

Dear Mr. Stanton:

This letter is prompted by the Commission's preliminary review of your Year End Amendment. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

-Schedule A of your report (pertinent portion attached) discloses an apparent contribution from a corporation. You are advised that a contribution from a corporation is prohibited by 2 U.S.C. 441b, unless made from a separate segregated fund established by the corporation. If you have received a corporate contribution, the Commission recommends that you refund the full amount to the donor. (Any refund itemized on Schedule B should be reported on Line 26 of the Detailed Summary Page of your next report.)

Under 2 U.S.C. 441b(b)(2)(C), corporate funds may be used in the establishment and administration of, and the solicitation of contributions to, a separate segregated fund. These monies are not considered contributions or expenditures under the Act. 2 U.S.C. 441b(b)(2); 11 C.F.R. 114.1(a)(2)(iii). In order for such monies to be exempted, however, the corporation must either pay the administrative expenses directly or such monies must be segregated into an account separate from the contributions account.

If you should find, however, that the receipt in question is not corporate, but is from a partnership, an allocation of the contribution according to either (1) the partners' share of the profits or (2) an agreement among the partners, must be provided together with the identification of the partners. 11 C.F.R. 110.1(e).

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729-61  
Jm 7/31

John Stanton  
National Right to Life  
Political Action Committee

2

If you find that the source of the contribution is permissible and was disclosed incorrectly or incompletely on your report, please amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of a prohibited contribution, your prompt refund of the contribution to the donor will be taken into consideration by the Commission.

An amendment to your report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

*Mark Kleinman*

Mark Kleinman  
Reports Analyst  
Reports Analysis Division

8 4 8 14 0 3 4 3 5 13 3 2 7 6 7



BRAMES, BOPP & HAYNES  
ATTORNEYS AT LAW  
800 SYCAMORE BUILDING  
19 SOUTH SIXTH STREET  
TERRE HAUTE, INDIANA 47807

ARNOLD H. BRAMES  
JAMES BOPP, JR.  
DAVID D. HAYNES

*Note Right to Life*

31 AUG 13 11:46

TELEPHONE  
(812) 238-2421

August 11, 1981

Mr. Mark Kleinman, Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
1325 K Street, N. W.  
Washington, D. C. 20463

COO 111 278

Re: Your letter of July 24, 1981,  
reference October, 1980 quarterly  
report and 1980 year end amendment

Dear Mr. Kleinman:

*3X-A-Y/E*  
*11-25-80 - 12-31-80*

On July 24, 1981, you sent me two letters regarding the above entitled matter. In each case, these letters related to the reimbursement of administrative expenses by the National Right to Life Committee, Inc. to its connected PAC, the National Right to Life Political Action Committee. In each case, you asked for further information to justify the use of these corporate funds for NRLPAC. As General Counsel for the National Right to Life Committee and the National Right to Life Political Action Committee, I am making this response.

As you correctly point out in your letter, corporate funds may be used in the establishment and administration of, and the solicitation of contributions to, a separate segregated fund. In AO 1976-111 and AO 1979-33, the Federal Election Commission specifically permitted labor unions to reimburse its PAC for administrative expenses paid by it. In AO 1979-72, the Federal Election Commission approved similar payments by a connected organization to its separate segregated fund. In each case referred to in your letter, this was a reimbursement by the National Right to Life Committee to its PAC for administrative expenses. There is no requirement that the corporation must either pay the administrative expenses directly or such monies must be segregated into an account separate from the contributions account.

As a result, it is our position that these transfers were legal. If you have any other concerns regarding this matter, please let me know.

Sincerely,

BRAMES, BOPP & HAYNES

*[Signature]*  
James Bopp, Jr.

JB:maw

*CB 100*  
*8-17 8/21*

*255*  
*8-24*

*8-14-81*

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



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR #

1412

Date Filmed 5/30/84 Camera No. ---

2

Cameraman

JRL