



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1551

Date Filmed 6/12/84 Camera No. --- 4

Cameraman JRL

208

84-04-01-001

RE: MUR 1551, 1550, Re MUR 107

FEDERAL ELECTION COMMISSION

Routing Slips, Internal Reports (12 Day Reports: 12 Day Re Brief)

Comment sheets, Commissioner objection memo with comments,

~~Duplicate Reports~~, Documents pertaining to Conciliation

GOC Report of 7/27/83 which was withdrawn on 8/9/83

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):

\_\_\_ (1) Classified Information

\_\_\_ (6) Personal privacy

X (2) Internal rules and practices

\_\_\_ (7) Investigatory files

\_\_\_ (3) Exempted by other statute

\_\_\_ (8) Banking Information

\_\_\_ (4) Trade secrets and commercial or financial information

\_\_\_ (9) Well Information (geographic or geophysical)

X (5) Internal Documents

Signed Beverly B. Kramer  
date June 1, 1984

FEC 9-21-77

84040460209



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Congressional Black Caucus  
Political Action Committee  
Congressman Louis Stokes  
Congressman William L. Clay

)  
)  
)  
)  
)  
)  
MUR 1551

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 30, 1984, the Commission decided by a vote of 5-0 to take the following actions in MUR 1551:

1. Accept the conciliation agreement as attached to the General Counsel's Report signed May 24, 1984.
2. Close the file in MUR 1551.
3. Approve and send the letters attached to the General Counsel's Report signed May 24, 1984.

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

Attest:

May 30, 1984

Date

Jody C. Ransom  
for Marjorie W. Emmons  
Secretary of the Commission

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

5-24-84, 2:50  
5-25-84, 2:00

84040160210

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Congressional Black Caucus ) MUR 1551  
Political Action Committee )  
Congressman Louis Stokes )  
Congressman William L. Clay )

CONCILIATION AGREEMENT

84040160211  
This matter was initiated by signed, sworn, and notarized complaints submitted by Robert C. Heckman of the Fund For A Conservative Majority, Paul D. Kamenar of the Washington Legal Foundation and Louis W. Barnett of Citizens for the Republic. Reason to believe was found that the Congressional Black Caucus Political Action Committee ("CBC-PAC") and its treasurers, Congressman Louis Stokes and Congressman William L. Clay (hereinafter "Respondents") violated:

1. 2 U.S.C. § 441b(a) by accepting corporate contributions;
2. 2 U.S.C. § 441d by failing to include the required disclaimer stating the name of the person paying for the costs of a solicitation dated April 14, 1983; and
3. 2 U.S.C. § 433(c) by failing to file a timely amendment to their Statement of Organization reflecting a change in treasurer.

Now, therefore, the Commission and Respondents having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a) (4) (A) (i).

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

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

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

The Parties

1. Respondent, CBC-PAC, is a political committee for purposes of 2 U.S.C. § 431(4).
2. Respondents, Congressman Louis Stokes and Congressman William L. Clay served as treasurers of CBC-PAC during the period in which the aforementioned violations occurred.

Violation of 2 U.S.C. § 441b(a)

1. Section 441b(a) of Title 2, United States Code prohibits a political committee from accepting corporate contributions in connection with any Federal election.
2. On April 16, 1982, Respondents accepted a contribution of one hundred dollars (\$100) from the Black Affairs Center Inc., an incorporated entity, in violation of 2 U.S.C. § 441b(a).
3. On June 17, 1982, Respondents accepted a contribution by fifty dollars (\$50) from New Shiloh Baptist Church, an incorporated entity, in violation of 2 U.S.C. § 441b(a).

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4. On September 19, 1982, Respondents accepted a contribution of twenty-five dollars (\$25) from Bonner & Haitcock M.D.'s Ltd., an incorporated entity, in violation of 2 U.S.C. § 441b(a).
5. On May 24, 1982, Respondents accepted a contribution of twenty dollars (\$20) from H.R.R.F. Inc., an incorporated entity, in violation of 2 U.S.C. § 441b(a).
6. On July 1, 1982, Respondents accepted a contribution of twenty-five dollars (\$25) from the Black Nurses Association of GWA, an incorporated entity, in violation of 2 U.S.C. § 441b(a).

Violation of 2 U.S.C. § 441d

1. Section 441d of Title 2, United States Code, requires that any direct mail solicitation bear a disclaimer stating the name of the person who paid for the communication and whether or not the communication had been authorized by any candidate or candidate committee.
2. Respondents failed to include the required disclaimer on a solicitation dated April 14, 1983, in violation of 2 U.S.C. § 441d.

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Violation of 2 U.S.C. § 433(c)

1. Section 433(c) of Title 2, United States Code, requires that any change in information previously submitted in a Statement of Organization must be reported no later than ten days after the date of the change.

2. Sometime between March 31, 1982 and July 15, 1982, Congressman William L. Clay vacated the office of treasurer for CBC-PAC and was replaced by Congressman Louis Stokes.

3. Respondents failed to file an amendment to their Statement of Organization reflecting a change in treasurers until May 26, 1983, in violation of 2 U.S.C. § 433(c).

V. Respondents contend that the foregoing errors and omissions were not knowingly or wilfully made.

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

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

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

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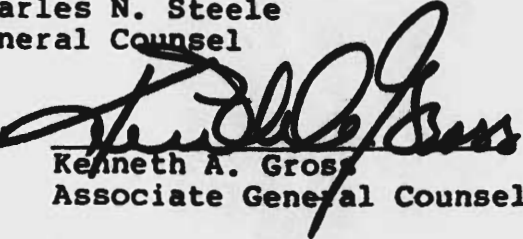
IX. This agreement shall become effective as of the date that all parties have executed same and the Commission has approved the entire agreement.

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

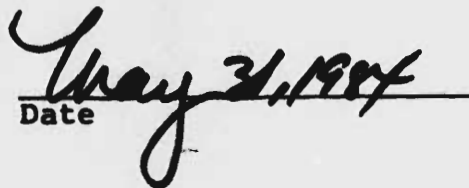
FOR THE COMMISSION:

Charles N. Steele  
General Counsel

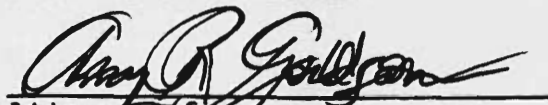
By

  
Kenneth A. Gross  
Associate General Counsel

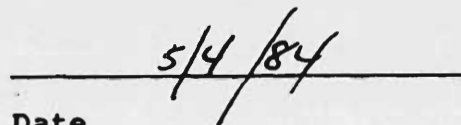
Date

  
May 31, 1984

FOR THE RESPONDENT:

  
Attorney for  
Congressional Black Caucus  
Political Action Committee  
and its treasurers,  
Congressman Louis Stokes  
and Congressman William L. Clay

Date

  
5/4/84

34040460215



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

May 31, 1984

Mr. Jonathan Z. Rubin  
Capitol Hill Hotel  
200 C Street, S.E.  
Washington, D.C. 20003

RE: . MUR 1551

Dear Mr. Rubin:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within 10 days.

Should you have any questions, contact Beverly Kramer, the staff member assigned to this matter, at (202)523-4143.

Sincerely,

Charles N. Steele  
General Counsel

  
By: Kenneth A. Gross  
Associate General Counsel

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 31, 1984

Amy Robertson Goldson, Esq.  
4015 - 28th Place, N.W.  
Washington, D.C. 20008

RE: MUR 1551  
Congressional Black Caucus  
Political Action Committee and  
Congressmen Louis Stokes and  
William L. Clay, as treasurers

Dear Ms. Goldson:

On May 30, 1984, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of violations of 2 U.S.C. §§ 441b, 441d and 433(c), provisions 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

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

May 31, 1984

Robert C. Heckman  
Chairman  
Fund For a Conservative Majority  
Washington, D.C. 20002

Re: MUR 1551

Dear Mr. Heckman:

This is in reference to the complaint you filed with the Commission on May 6, 1983, against the Congressional Black Caucus and the Congressional Black Caucus Political Action Committee alleging violations of the Federal Election Campaign laws.

The Commission determined there was reason to believe that the Congressional Black Caucus Political Action Committee and Congressman Louis Stokes and William L. Clay, as treasurers, violated 2 U.S.C. §§ 441b, 441d, and 433(c), provisions of the Federal Election Campaign Act of 1971, as amended and conducted an investigation in this matter. On May 30, 1984, a conciliation agreement signed by the respondents was accepted by the Commission, thereby concluding the matter. A copy of this agreement is enclosed for your information. Also enclosed for your information are copies of certifications of the Commission's findings with respect to the other allegations raised in your complaint and copies of the General Counsel's factual and legal analysis which formed the basis of the Commission's findings.



Letter to Robert C. Heckman  
Page 2

The file number in this matter is MUR 1551. If you have any questions, please contact Beverly Kramer, the staff member assigned to this matter, at (202)523-4143.

Sincerely,

Charles N. Steele  
General Counsel

  
BY: Kenneth A. Gross  
Associate General Counsel

Enclosure  
Conciliation Agreement  
Certifications  
General Counsel's Reports and Brief

84040460219





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

May 31, 1984

Nancy B. Stewart, Esq.  
Public Integrity Section  
U.S. Department of Justice  
P.O. Box 50168  
F Street Station  
Washington, D.C. 20004

Re: MUR 1551

Dear Ms. Stewart:

This is in reference to the captioned matter involving a violation of the disclaimer requirements by the Congressional Black Caucus Political Action Committee, which your office referred to the Commission by letter dated June 10, 1983. See attachment.

After conducting an investigation into this matter, the Commission determined that there was reason to believe that the Congressional Black Caucus Political Action Committee and its treasurers, Congressmen Louis Stokes and William L. Clay violated 2 U.S.C. § 441d, a provision of the Federal Election Campaign Act of 1971, as amended, and entered into a conciliation agreement in the matter. A copy of this agreement is enclosed for your information.

We appreciate your cooperation in helping the Commission meet its enforcement responsibilities under the Federal Election Campaign Act.

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Letter to Nancy Stewart  
Page 2

If you have any questions, please contact Beverly Kramer,  
the staff member assigned to this matter, at (202)523-4143.

Sincerely,

Charles N. Steele  
General Counsel

  
By: Kenneth A. Gross  
Associate General Counsel

Enclosures  
Referral  
Conciliation Agreement

cc: Louis Wm. Barnett, Political Director  
Citizens for the Republic

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

**May 31, 1984**

**Paul D. Kamenar, Esq.**  
**Washington Legal Foundation**  
**1612 K Street, N.W.**  
**Suite 502**  
**Washington, D.C. 20006**

**Re: MUR 1551**

**Dear Mr. Kamenar:**

This is in reference to the complaint you filed with the Commission on May 6, 1983, against the Congressional Black Caucus Political Action Committee, Congressman Louis Stokes and Congressman William L. Clay, alleging violations of the Federal Election Campaign laws.

The Commission determined there was reason to believe that the above-referenced respondents violated 2 U.S.C. §§ 441b, 441d, and 433(c), provisions of the Federal Election Campaign Act of 1971, as amended and conducted an investigation in this matter. On May 30, 1984, a conciliation agreement signed by the respondents was accepted by the Commission, thereby concluding the matter. A copy of this agreement is enclosed for your information. Also enclosed for your information are copies of certifications of the Commission's findings with respect to the other allegations raised in your complaint and copies of the General Counsel's factual and legal analysis which formed the basis of the Commission's findings.

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Letter to Paul D. Kamenar  
Page 2

The file number in this matter is MUR 1551. If you have any questions, please contact Beverly Kramer, the staff member assigned to this matter, at (202)523-4143.

Sincerely,

Charles N. Steele  
General Counsel

  
BY: Kenneth A. Gross  
Associate General Counsel

Enclosure  
Conciliation Agreement  
Certifications  
General Counsel's Reports and Brief

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CONGRESSIONAL BLACK CAUCUS POLITICAL  
ACTION COMMITTEE CBC - PAC  
P.O. BOX 2006  
WASHINGTON, D.C. 20013

1086

15-7007/2040

3-16 1984

PAY  
TO THE  
ORDER OF

Treasurer of United States

\$ 250.00

Two Hundred + Fifty

DOLLARS

**FSL** INDEPENDENCE FEDERAL SAVINGS  
& LOAN ASSOCIATION  
OF WASHINGTON

FOR

*William F. Lee*  
*President*

⑈001086⑈ ⑆254070077⑆

0298 00812⑈

RUCCO 81





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

February 24, 1984

Jonathan Z. Rubin  
Capitol Hill Hotel  
200 C Street, S.E.  
Washington, D.C. 20003

RE: MUR 1551

Dear Mr. Rubin:

84040160225  
This is to advise you that after an investigation was conducted, the Commission concluded on February 23, 1984, that there is no probable cause to believe that the Capitol Hill Hotel violated the Act. Accordingly the file in this matter, numbered MUR 1551, has been closed as it pertains to the Hotel. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Beverly Kramer at (202)523-4057.

Sincerely,

Charles N. Steele  
General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Capitol Hill Hotel )

MUR 1551

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 23, 1984, the Commission decided by a vote of 6-0 to take the following actions in MUR 1551:

1. Find no probable cause to believe that the Capitol Hill Hotel violated 2 U.S.C. § 441b(a).
2. Close the file with respect to respondent, Capitol Hill Hotel, in MUR 1551.
3. Approve the letter as attached to the General Counsel's Report signed February 17, 1984.

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

Attest:

2-22-84

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

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

2-17-84, 4:54  
2-21-84, 11:00

84040460226



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

84 FEB 17 P 4: 54

February 17, 1984

**SENSITIVE**

MEMORANDUM TO: The Commission

THROUGH: John C. Surina  
Staff Director *JCS*

FROM: Charles N. Steele *CNS (ccny)*  
General Counsel

SUBJECT: General Counsel's Report - MUR 1551  
Respondent: Capitol Hill Hotel

During the reproduction of documents to go before the Commission in regard to MUR 1551 this report was inadvertently left out. We are therefore circulating the above-referenced report at this time.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of  
Capitol Hill Hotel

)  
)  
)

MUR 1551

GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter was initiated based on a complaint filed by the Washington Legal Foundation on May 6, 1983, alleging, inter alia, that the Capitol Hill Hotel violated the Federal Election Campaign Act of 1971, as amended 2 U.S.C. § 431 et seq. ("the Act"). Upon review of the allegations contained in the complaint, the Commission on August 22, 1983, found reason to believe that the Capitol Hill Hotel violated 2 U.S.C. § 441b(a) by making an in-kind contribution to the Congressional Black Caucus Political Action Committee ("CBC-PAC") in permitting CBC-PAC to use the hotel as a mail drop. By letter of September 20, 1983, Mr. Jonathan Z. Rubin responded on behalf of the Capitol Hill Hotel. In addition, the Commission received a response from CBC-PAC.

On January 10, 1984, this Office mailed to the respondent a General Counsel's Brief recommending that the Commission find no probable cause to believe that the Capitol Hill Hotel violated 2 U.S.C. § 441b(a). As of this writing, we have received no response to the General Counsel's Brief.

II. LEGAL ANALYSIS

See the General Counsel's Brief of January 10, 1984.

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**III. GENERAL COUNSEL'S RECOMMENDATIONS**

1. Find no probable cause to believe that the Capitol Hill Hotel violated 2 U.S.C. § 441b(a).
2. Close the file with respect to respondent, Capitol Hill Hotel, in MUR 1551.
3. Approve the attached letter.

Date

2/11/84

Charles N. Steele (sma)  
Charles N. Steele  
General Counsel

Attachment

84040460229



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Congressional Black Caucus )  
Political Action Committee )  
Congressman Louis Stokes )  
Congressman William L. Clay )

MJR 1551

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission Executive Session on February 14, 1984, do hereby certify that the Commission decided by a vote of 4-0 to take the following actions in MJR 1551:

1. Find no probable cause to believe that the Congressional Black Caucus is the connected organization of the Congressional Black Caucus Political Action Committee for purposes of 2 U.S.C. § 431(7).
2. Find no probable cause to believe that the Congressional Black Caucus Political Action Committee and its treasurers, Congressman Clay and Congressman Stokes, violated 2 U.S.C. § 433(b)(2) by failing to report the name, address, relationship and type of its connected organization.
3. Find no probable cause to believe that the Congressional Black Caucus Political Action Committee and its treasurers, Congressman Clay and Congressman Stokes, violated 2 U.S.C. § 441b(b)(4) by soliciting contributions outside of the membership class of the Congressional Black Caucus.
4. Find no probable cause to believe that the Congressional Black Caucus Political Action Committee and its treasurers, Congressman Clay and Congressman Stokes, accepted an in-kind contribution from the Capitol Hill Hotel in violation of 2 U.S.C. § 441b(a).

(Continued)

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5. Find no probable cause to believe that the Congressional Black Caucus Political Action Committee and its treasurers, Congressman Clay and Congressman Stokes, violated 2 U.S.C. § 432(g)(4) by failing to file reports with the Commission.

6.

7. Approve the letter attached to the General Counsel's report dated February 7, 1984.

Commissioners Aikens, Elliott, Harris, and Reiche voted affirmatively for the decision; Commissioners McDonald and McGarry were not present at the time of the vote.

Attest:

2-14-84

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

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SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )

Congressional Black Caucus )

Political Action Committee )

Congressman Louis Stokes )

Congressman William L. Clay )

34 FEB 7 11:00

MUR 1551 (83)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter was initiated by two complaints filed by Robert C. Heckman of the Fund for a Conservative Majority and Paul D. Kamenar of the Washington Legal Foundation on May 6, 1983, alleging that the Congressional Black Caucus ("the Caucus"), the Congressional Black Caucus Political Action Committee ("CBC-PAC"), Congressman Louis Stokes, and Congressman William L. Clay, violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). In addition, the Commission received a referral from the Department of Justice on June 15, 1983, concerning a complaint submitted to the Department by Louis W. Barnett of Citizens for the Republic, alleging, inter alia, violations of the Act.

Upon review of the allegations contained in the complaints, the Commission, on August 22, 1983, found reason to believe that:

- 1) the Caucus is the connected organization of CBC-PAC for purposes of 2 U.S.C. § 431(7);

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2) CBC-PAC and its treasurers, Congressman Clay and Congressman Stokes, violated 2 U.S.C. § 433(b)(2) by failing to report the name, address, relationship and type of its connected organization, the Congressional Black Caucus;

3) CBC-PAC and its treasurers, Congressman Clay and Congressman Stokes, violated 2 U.S.C. § 441b(b)(4) by soliciting contributions outside of the membership class of the Congressional Black Caucus;

4) CBC-PAC and its treasurers, Congressman Clay and Congressman Stokes, violated 2 U.S.C. § 441b(a) by accepting corporate contributions;

5) CBC-PAC and its treasurers, Congressman Clay and Congressman Stokes, violated 2 U.S.C. § 441d by failing to include the required disclaimer stating the name of the person paying for the costs of a solicitation dated April 14, 1983;

6) CBC-PAC and its treasurers, Congressman Clay and Congressman Stokes, violated 2 U.S.C. § 433(a) by failing to file a timely Statement of Organization, but take no further action;

7) CBC-PAC and its treasurers, Congressman Clay and Congressman Stokes, violated 2 U.S.C. § 433(c) by failing to file a timely amendment to their Statement of Organization reflecting a change in treasurers; and

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8) CBC-PAC and its treasurers, Congressman Clay and Congressman Stokes, violated 2 U.S.C. § 432(g)(4) by failing to file reports with the Commission.

On September 16 and November 7, 1983, CBC-PAC and its treasurers responded through counsel to the allegations involved. In addition, the Office of General Counsel received responses from Congressman Julian Dixon, Chairman of the Congressional Black Caucus, and Johnathan Rubin of the Capitol Hill Hotel.

On January 10, 1984, this Office sent a brief to the respondents stating the position of the General Counsel on the legal and factual issues in this matter. On January 31, 1984, the Office of General Counsel received the respondents' reply to the General Counsel's Brief. See Attachment. The response states that the respondents are in accord with the position as set forth in the General Counsel's Brief and have no further comments at this time. In addition, the response requests an opportunity to settle this matter through a conciliation agreement, prior to a finding of probable cause, on those issues in the General Counsel's Brief recommended a finding of probable cause.

## II. LEGAL ANALYSIS

See the General Counsel's Brief of January 10, 1984.

## III.

The General Counsel's Brief sets forth recommendation for findings of probable cause and no probable cause to believe that the respondents violated various provisions of the Act. On those

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issues where the General Counsel's Brief recommends a finding of no probable cause to believe, we advise that the Commission approve the General Counsel's recommendations. With respect to those issues where the General Counsel's Brief recommends that the Commission find probable cause to believe violations occurred, we advise that the Commission enter into a conciliation agreement with the respondents pursuant to 2 U.S.C. § 437g(a)(4) and 11 C.F.R. § 111.18(d).

#### IV. GENERAL COUNSEL'S RECOMMENDATIONS

1. Find no probable cause to believe that the Congressional Black Caucus is the connected organization of the Congressional Black Caucus Political Action Committee for purposes of 2 U.S.C. § 431(7).

2. Find no probable cause to believe that the Congressional Black Caucus Political Action Committee and its treasurers, Congressman Clay and Congressman Stokes, violated 2 U.S.C. § 433(b)(2) by failing to report the name, address, relationship and type of its connected organization.

3. Find no probable cause to believe that the Congressional Black Caucus Political Action Committee and its treasurers,

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Congressman Clay and Congressman Stokes, violated 2 U.S.C. § 441b(b)(4) by soliciting contributions outside of the membership class of the Congressional Black Caucus.

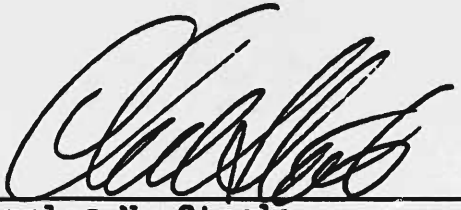
4. Find no probable cause to believe that the Congressional Black Caucus Political Action Committee and its treasurers, Congressman Clay and Congressman Stokes, accepted an in-kind contribution from the Capitol Hill Hotel in violation of 2 U.S.C. § 441b(a).

5. Find no probable cause to believe that the Congressional Black Caucus Political Action Committee and its treasurers, Congressman Clay and Congressman Stokes, violated 2 U.S.C. § 432(g)(4) by failing to file reports with the Commission.

6. Approve the attached proposed conciliation agreement.

7. Approve the attached letter.

7 February 1984  
Date

  
Charles N. Steele  
General Counsel

Attachments

Correspondence dated 1/24/84 from Amy Robertson Goldson,  
Counsel for the respondents.  
Proposed conciliation agreement and letter.

84040460236



AMY ROBERTSON GOLDSON  
ATTORNEY AT LAW

4018 28TH PLACE NORTHWEST  
WASHINGTON, D.C. 20008  
(202) 962-7261

January 24, 1984

RECEIVED AT THE FEC  
Cert # 1534

84 JAN 31 11:52

MUR 1551  
Kramer

JAN 31 P 4:04

Ms. Beverly Kramer  
Federal Election Commission  
Office of the General Counsel  
1325 "K" Street, N.W.  
Suite 710  
Washington, D.C. 20463

Re: MUR 1551  
Congressional Black Caucus  
Political Action Committee  
Congressman Louis Stokes  
Congressman William Clay

Dear Ms. Kramer:

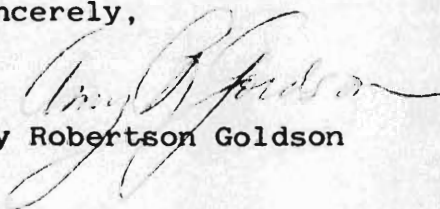
We have had the opportunity to review the brief of the General Counsel on the legal and factual issues of the above-captioned matter.

Please be advised that the respondents are in accord with the position as set forth in the brief and have no further comments at this time.

Accordingly, respondents respectfully request an opportunity to settle this matter through a conciliation agreement on those issues upon which a finding of probable cause has been recommended.

Should you have any questions relative to the foregoing, please so advise.

Sincerely,

  
Amy Robertson Goldson

cc: The Honorable William Clay  
The Honorable Louis Stokes

84040460237



840401602  
RY ROBERTSON GOLDSON

ATTORNEY AT LAW

4015 28TH PLACE NORTHWEST

WASHINGTON, D. C. 20008



84 JAN 31 AIR

Ms. Beverly Kramer  
Federal Election Commission  
Office of the General Counsel  
1325 "K" Street, N.W.  
Suite 710  
Washington, D.C. 20463



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

January 10, 1984

Jonathan Z. Rubin  
Capitol Hill Hotel  
200 C Street, S.E.  
Washington, D.C. 20003

RE: MUR 1551

Dear Mr. Rubin:

Based on a complaint filed with the Commission on May 6, 1983, the Commission determined on August 22, 1983, that there was reason to believe that the Capitol Hill Hotel had violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

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 submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

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

Sincerely,

A handwritten signature in dark ink, appearing to read "C. Steele", written over a horizontal line.

Charles N. Steele  
General Counsel

Enclosure  
Brief

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

January 10, 1984

Amy Robertson Goldson, Esq.  
Victor Sterling, Esq.  
4015 - 28th Place, N.W.  
Washington, D.C.

RE: MUR 1551  
Congressional Black Caucus  
Political Action Committee  
Congressman Louis Stokes  
Congressman William Clay

Dear Ms. Goldson and Mr. Sterling:

Based on complaints filed with the Commission on May 6, 1983, and information supplied by you the Commission determined on August 22, 1983, that there was reason to believe that your clients, the Congressional Black Caucus Political Action Committee ("CBC-PAC") and its treasurers, Congressman Clay and Congressman Stokes, had violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"), and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that your clients violated 2 U.S.C. § 441b(a), § 441d, and § 433(c). In addition, the Office of General Counsel is prepared to recommend that the Commission find no probable cause to believe that the Congressional Black Caucus is the connected organization of CBC-PAC for purposes of 2 U.S.C. § 431(7) or that your clients violated 2 U.S.C. § 433(b)(2), § 441b(b)(4) and § 432(g)(4). The Commission may or may not approve the General Counsel's recommendations.

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.

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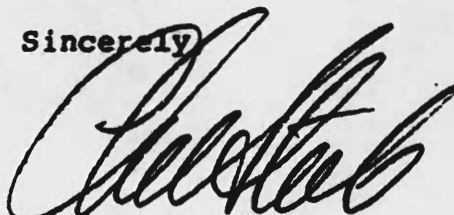
Letter to Amy Goldson and Victor Sterling  
Page 2

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.

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 Beverly Kärner at (202) 523-4057.

Sincerely



Charles N. Steele  
General Counsel

Enclosure  
Brief

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary  
FROM: Office of General Counsel *Cut*  
DATE: January 10, 1984  
SUBJECT: MUR 1551 - Memorandum and General Counsel's Briefs

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

CIRCULATIONS

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

Other [ ]

DISTRIBUTION

Compliance [X]  
Audit Matters [ ]  
Litigation [ ]  
Closed MUR Letters [ ]  
Status Sheets [ ]  
Advisory Opinions [ ]  
Other (see distribution below) [ ]

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

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January 10, 1984

MEMORANDUM TO: The Commission

FROM: Charles N. Steele  
General Counsel

SUBJECT: MUR 1551

**SENSITIVE**

Attached for the Commission's review are briefs stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. Copies of these briefs and letters notifying the respondents of the General Counsel's recommendations to the Commission were mailed on January 10, 1984. Following receipt of the respondents' replies to these notices this Office will make a further report to the Commission.

Attachments

1. Briefs
2. Letters to Respondents

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of                    )  
                                      )  
Capitol Hill Hotel                )     MUR 1551

GENERAL COUNSEL'S BRIEF

I.     STATEMENT OF THE CASE

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This matter was initiated based on a complaint filed by the Washington Legal Foundation on May 6, 1983, alleging, inter alia, that the Capitol Hill Hotel violated the Federal Election Campaign Act of 1971, as amended 2 U.S.C. § 431 et seq. ("the Act"). Upon review of the allegations contained in the complaint, the Commission on August 22, 1983, found reason to believe that the Capitol Hill Hotel violated 2 U.S.C. § 441b(a) by making an in-kind contribution to the Congressional Black Caucus Political Action Committee ("CBC-PAC") in permitting CBC-PAC to use the hotel as a mail drop.

By letter of September 20, 1983, Mr. Jonathan Z. Rubin responded on behalf of the Capitol Hill Hotel. In addition, the Commission received a response from CBC-PAC. \*/

Mr. Rubin explains the circumstances under which the Hotel agreed to accept mail for CBC-PAC. According to his response, sometime in early April he was approached by Mr. David Greene, then consulting director for CBC-PAC, who inquired about leasing office space for CBC-PAC. A week later Mr. Greene contacted Mr.

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\*/ Copies of the responses were circulated to the Commission on November 16, 1983.

Rubin and expressed his interest and intention to lease office space from the Hotel for a period of one to two years. Mr. Greene stated that the office would not be needed until mid-July 1983, however, CBC-PAC would be receiving mail prior to that date. Consequently, Mr. Greene asked whether CBC-PAC's mail could be sent to the Capitol Hill Hotel. As it was common for the Hotel to accept mail for a transient guest that has not arrived, but is due to arrive, Mr. Rubin agreed to accept CBC-PAC's mail.

According to CBC-PAC's response, the use of the hotel's address on a solicitation dated April 14, 1983, was the result of the unauthorized actions of David Greene. When the letter of solicitation was first seen by Congressman Clay, then treasurer of CBC-PAC, Mr. Greene was advised that CBC-PAC had a post office box for the receipt of mail. Subsequently, Congressman Clay submitted a change of address card, indicating that CBC-PAC mail should go to its post office box, to the U.S. Post Office. According to CBC's response and as later verified by Mr. Rubin, no mail, apart from mail which was returned as undeliverable, was received by the Hotel.

## II. LEGAL ANALYSIS

2 U.S.C. § 441b(a) prohibits a corporation from making contributions in connection with any federal election. For purposes of this provision, the term "contributions" includes all in-kind contributions, i.e., the provision of any goods or services without charge or at a charge which is less than the

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usual and normal charge for such goods or services. See  
11 C.F.R. § 100.7.


Information provided by respondents reveals that the address of the Capitol Hill Hotel was used in anticipation of a large response to CBC-PAC's April 14, 1983, solicitation and that the Hotel agreed to accept the mail in hope of renting office space to CBC-PAC in the future. No mail, however, apart from that which was returned as undeliverable, was ever received by the Hotel. The use of the Hotel's premises as a mail drop was avoided when Congressman Clay submitted a change of address card to the U.S. Post Office.

In view of this additional information it does not appear that the Hotel made an in-kind contribution to CBC-PAC. Accordingly, the Office of General Counsel recommends that the Commission find no reason to believe that the Capitol Hill Hotel violated 2 U.S.C. § 441b(a).

### III. GENERAL COUNSEL'S RECOMMENDATION

Find no probable cause to believe that the Capitol Hill Hotel violated 2 U.S.C. § 441b(a).

6 January 1984  
Date

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

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Congressional Black Caucus )  
Political Action Committee ) MUR 1551 (83)  
Congressman Louis Stokes )  
Congressman William L. Clay )

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

8 4 0 4 0 4 6 0 2 4 7  
This matter was initiated by two complaints filed by Robert C. Heckman of the Fund for a Conservative Majority and Paul D. Kamenar of the Washington Legal Foundation on May 6, 1983, alleging that the Congressional Black Caucus ("the Caucus"), the Congressional Black Caucus Political Action Committee ("CBC-PAC"), Congressman Louis Stokes, and Congressman William L. Clay, violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). In addition, the Commission received a referral from the Department of Justice on June 15, 1983, concerning a complaint submitted to the Department by Louis W. Barnett of Citizens for the Republic, alleging, inter alia, violations of the Act.

Upon review of the allegations contained in the complaints, the Commission, on August 22, 1983, found reason to believe that:

- 1) the Caucus is the connected organization of CBC-PAC for purposes of 2 U.S.C. § 431(7);

- 2) CBC-PAC and its treasurers, Congressman Clay and Congressman Stokes, violated 2 U.S.C. § 433(b)(2) by failing to report the name, address, relationship and type of its connected organization, the Congressional Black Caucus;
- 3) CBC-PAC and its treasurers, Congressman Clay and Congressman Stokes, violated 2 U.S.C. § 441b(b)(4) by soliciting contributions outside of the membership class of the Congressional Black Caucus;
- 4) CBC-PAC and its treasurers, Congressman Clay and Congressman Stokes, violated 2 U.S.C. § 441b(a) by accepting corporate contributions;
- 5) CBC-PAC and its treasurers, Congressman Clay and Congressman Stokes, violated 2 U.S.C. § 441d by failing to include the required disclaimer stating the name of the person paying for the costs of a solicitation dated April 14, 1983;
- 6) CBC-PAC and its treasurers, Congressman Clay and Congressman Stokes, violated 2 U.S.C. § 433(a) by failing to file a timely Statement of Organization, but take no further action;
- 7) CBC-PAC and its treasurers, Congressman Clay and Congressman Stokes, violated 2 U.S.C. § 433(c) by failing to file a timely amendment to their Statement of Organization reflecting a change in treasurers; and

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8) CBC-PAC and its treasurers, Congressman Clay and Congressman Stokes, violated 2 U.S.C. § 432(g)(4) by failing to file reports with the Commission.

In addition, the Commission approved the issuance of a letter to CBC-PAC, requesting a response to enclosed questions.

CBC-PAC and its treasurers, Congressman Clay and Congressman Stokes, 1/ have responded, through counsel, to the allegations involved. In addition, the Office of General Counsel has received responses from Congressman Julian Dixon, Chairman of the Congressional Black Caucus, and Johnathan Rubin of the Capitol Hill Hotel. 2/

(a) Relationship between the Caucus and CBC-PAC

The Congressional Black Caucus maintains that it is not the connected organization of CBC-PAC. The response submitted by Congressman Julian Dixon states that the Caucus, as a collective body, never organized or established CBC-PAC, neither sets policy nor initiatives for CBC-PAC, nor controls or involves itself in the operation or functions of CBC-PAC. In addition, the response states that the Caucus does not assist CBC-PAC in fundraising, does not require or request that its members contribute to CBC-PAC, and does not make suggestions or recommendations regarding

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1/ Congressman Clay served as treasurer of the Committee from November 17, 1981 to July 15, 1982. Congressman Stokes held this position from July 15, 1982 to May 4, 1983. The current treasurer of the Committee is Congressman William Fauntroy.

2/ Copies of the responses were circulated to the Commission on November 16, 1983.

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those candidates to whom CBC-PAC will contribute.

According to the response, many of the black members of Congress are involved in CBC-PAC, however, their participation is an individual decision and unrelated to their involvement with the Caucus.

CBC-PAC also disputes the Commission's finding that the Caucus is its connected organization and, therefore, maintains that CBC-PAC did not violate 2 U.S.C. § 433(b)(2) or § 441b(b)(4).

CBC-PAC argues that the Caucus, by virtue of who its members are, should not be determined a connected organization of CBC-PAC. It contends that the participation by the black members of Congress in the Caucus is no different from the participation by these same members in the Democratic Study Group, another legislative service organization. Furthermore, it argues that the fact that all of the black members of Congress are members of the Democratic Study Group does not demonstrate that the Democratic Study Group is a connected organization of CBC-PAC.

Respondents also submit that by virtue of its name, CBC-PAC should not be deemed connected to the Caucus. CBC-PAC explains that the use of the name "Congressional Black Caucus Political Action Committee" came about as the result of an individual decision made by its organizers and that neither the approval nor disapproval of the Caucus was ever sought or obtained. CBC-PAC questions whether the Commission, based on the facts elicited

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in this case, would have nevertheless found reason to believe that the Caucus was its connected organization had it utilized another name such as "Blacks in Congress Political Action Committee." According to CBC-PAC's response, the Caucus has no right to control or influence the operation of CBC-PAC and at no time has provided CBC-PAC with the use of its offices, staff, equipment or supplies.

Finally, CBC-PAC responds that while all of the Black members of Congress financially contribute to the Caucus, only nine members have financially contributed to CBC-PAC. Their involvement in CBC-PAC, according to the response, is the result of an individual decision of each member.

In response to questions propounded by the Commission, CBC-PAC provides the following information. CBC-PAC was founded by four individuals: Congressman William Clay, Congressman Walter E. Fauntroy, Congressman Louis Stokes and Congressman Mervyn Dymally. The initial "seed" money used by CBC-PAC to fund its start-up operations came from \$1,000 contributions separately made by the campaign committees of Congressman William Clay (November 18, 1981), Congressman Walter E. Fauntroy (December 18, 1981) and Congressman Louis Stokes (December 18, 1981). According to the response, the Caucus never provided assistance in establishing CBC-PAC nor did it contribute any "seed" money, office supplies, equipment or services to CBC-PAC.

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Regarding administrative costs, the response states that CBC-PAC is managed such that it does not require elaborate office space, telephones, typewriters, etc. for administrative purposes. It has never employed a staff person, however, two individuals were retained on a commission basis for the purpose of soliciting funds. Clerical and bookkeeping services were performed by one individual who was retained on a piece work hourly basis. According to the response, the number of hours of service totaled less than 30 hours. Other administrative costs include fees paid to two direct mail firms for direct mail solicitations.

CBC-PAC notes that by contrast the Caucus employs a full time staff consisting of Harriet Pritchett, Executive director; Sheila Senesie, Secretary; and Valerie Byrd, Administrative Assistant. According to the response of CBC-PAC and Congressman Julian Dixon, these individuals have not performed any work in connection with CBC-PAC.

Other information provided in CBC-PAC's response includes the identities of all members of Congress who have performed services for CBC-PAC, including, but not limited to, those who have allowed their names to be used for solicitation purposes. According to the response, since the inception of CBC-PAC, there have been twenty-two black members in Congress and members of the Caucus. Of these twenty-two black members, the authorized committees of nine members have made either loans or outright contributions to CBC-PAC. Four of the nine members have also

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performed voluntary work (fundraising, planning, advising) for CBC-PAC.

Including the aforementioned nine individuals, 18 out of the 22 Caucus members have authorized the use of their name on CBC-PAC solicitations. According to the response, these individuals, in their individual capacities will from time to time act on a voluntary basis as advisors to identify external resources and otherwise assist in the formulation of policy, and in the implementation of fundraising programs and other activities of CBC-PAC.

(b) Acceptance of Corporate Contributions

Respondents admit that CBC-PAC accepted a number of contributions from incorporated entities in violation of 2 U.S.C. § 441b(a). Specifically, CBC-PAC admits that it accepted corporate contributions from the Black Affairs, Inc. (\$100), the New Shiloh Baptist Church (\$50), Bonner & Haitcock, M.D.'s, Ltd. (\$25) and H.R.R.F., Inc. (\$20). As to the \$25 contribution received from the Black Nurses Association of GWA, Respondents state that they were previously advised by their bookkeeper that the D.C. Recorder of Deeds showed no corporate status for the Association. In light of the discrepancy in information received by the Commission, CBC-PAC has sent an inquiry to the Black Nurses Association of GWA. See attached response at 1.

To mitigate the violation of 2 U.S.C. § 441b(a), CBC-PAC has refunded the aforementioned corporate contributions and has

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submitted copies of refund checks negotiated by the Black Affairs, Inc., New Shiloh Baptist Church, Bonner & Haitcock, M.D.'s, Ltd. and H.R.R.F. 3/ The refund checks were issued on May 18, 1983, between 8 and 13 months after CBC-PAC received the corporate contributions.

(c) Receipt of corporate (in-kind) contribution from the Capitol Hill Hotel

CBC-PAC disputes the Commission's finding that it violated 2 U.S.C. § 441b(a) by accepting in-kind contributions from the Capitol Hill Hotel. The alleged contributions were for use of the Hotel premises by CBC-PAC as a mail drop.

According to CBC-PAC's response, the use of the hotel's address on a solicitation dated April 14, 1983, was the result of the unauthorized actions of David Greene, former consulting director of CBC-PAC, who attempted to negotiate office space at the Hotel. When the letter of solicitation was first seen by Congressman Clay, Mr. Greene was advised CBC-PAC had a post office box for the receipt of mail. Subsequently, Congressman

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3/ In its November 7, 1983, response (attached) CBC-PAC explains that after the complaint against CBC-PAC was filed, all contributions were reviewed by CBC-PAC. Although H.R.R.F. was not cited in the complaint, CBC-PAC nevertheless refunded the contribution since it appeared to be a corporate account. CBC-PAC attributes the acceptance of this contribution to oversight based on the fact that the response card reflected that it was a contribution from an individual, Richard Rubin. The contribution was received shortly after May 24, 1982 and appeared as an unitemized receipt in CBC-PAC's July Quarterly report for the period covering April 1, 1982 through June 30, 1982.

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Clay submitted a change of address card, indicating CBC-PAC mail should go to its post office box, to the U.S. Post Office. 4/ According to CBC-PAC's response, and as verified by Jonathan Rubin of the Capitol Hill Hotel, no CBC-PAC mail, apart from that which was returned as undeliverable, was received by the Hotel.

(d) Failure to Include a 441d Disclaimer on Solicitation

CBC-PAC admits that it violated 2 U.S.C. § 441d by failing to include a disclaimer on its April 14, 1983, solicitation stating the name of the person who paid for the solicitation. However, CBC-PAC calls the Commission's attention to mitigating factors surrounding the violation.

According to the response, Congressman Clay had advised David Greene that the contents of the April 14, 1983, letter must be reviewed prior to mailing. After reviewing the proposed letter, Congressman Stokes raised certain concerns. A meeting was arranged between Congressmen Stokes, Clay and Fauntroy to discuss and resolve those concerns. Following the meeting Congressman Clay contacted David Greene concerning recommended changes to the letter. Mr. Greene reported that the solicitation letter had already been mailed. 5/

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4/ Attached to its November 7, 1983, response is a copy of the change of change of address card submitted by CBC-PAC. See Attachment at 3.

5/ The response notes that as of June 9, 1983, Mr. Greene's relationship with CBC-PAC was formally terminated.

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(e) Reporting Violations

Respondents' reply to the Commission's notification of reason to believe findings does not address the Commission's findings with respect to violations of 2 U.S.C. § 433(c) and 432(g)(4). However, in an earlier response to the complaints filed in this matter, respondents admitted that they violated 2 U.S.C. § 433(c) and 432(g)(4) by failing to file a timely amendment to their statement of organization reflecting a change in treasurers and by failing to file reports with the Commission. The earlier response calls the Commission's attention to the fact that the admitted violations have been corrected.

II. LEGAL ANALYSIS

(a) Relationship between the Caucus and CBC-PAC

Section 431(7) of the Act defines connected organization as one that is not itself a political committee, but that "directly or indirectly establishes, administers or financially supports a political committee.

Respondents deny that the Caucus, as a collective body, has either directly or indirectly established, administered or financially supported CBC-PAC. Rather, they maintain that the participation of Caucus members in the affairs of CBC-PAC is left to the individual decision of each member.

The facts relative to the financial activities of CBC-PAC appear to support this view. Information obtained from disclosure reports and in response to Commission inquiries reveals

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that only nine out of the twenty-two members of the Caucus have made either loans or contributions to CBC-PAC. Four of these members were the original founders CBC-PAC. The initial seed money to fund the start up costs of CBC-PAC operations appears to have come from the authorized committees of three of its founders. In addition, only 18 members have authorized the use of their names on the letterhead of CBC-PAC solicitations or mailings. Two members have specifically requested that their names not be used by CBC-PAC in future mailings.

CBC-PAC's position is further substantiated by statements submitted by Congressman Julian Dixon on behalf of the Caucus. Congressman Dixon expressly states that the Caucus, as a collective body never organized or established CBC-PAC, neither sets policy nor initiatives for CBC-PAC, nor controls or involves itself in the operation of CBC-PAC. In addition, the Congressman verifies the claims of CBC-PAC that none of its initial "seed" money was provided by the Caucus and that none of the full-time staff of the Caucus has ever performed work in connection with CBC-PAC.

Perhaps the more troubling factor giving rise to questions of association is the use of the Caucus' name by CBC-PAC. Against the weight of the other factors brought out through this investigation, however, it cannot be considered to be a determinative factor. The Act at 2 U.S.C. § 432(e) (4) and (5) speaks to the issue of naming a political organization, but only

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with regard to authorized committees of a federal candidate and the separate segregated funds of a corporation or labor organization. Under these provisions an authorized committee is required to include in its name the name of the candidate who authorized such committee, while a separate segregated fund is required to include in its name the name of its connected organization. CBC-PAC is neither an authorized committee nor a separate segregated fund of a corporation or labor organization. Hence these restrictions do not apply and the use of the Caucus' name by CBC-PAC is not barred by the Act.

CBC-PAC explains that the name "Congressional Black Caucus Political Action Committee" was selected based on the assumption that it would have mass appeal and recognition. According to the response, "the name was intended to be reflective of the ideological viewpoint of CBC-PAC, whose interests lie in changing the make up of Congress to favor the cause of black and poor people."

In the General Counsel's view the information provided by CBC-PAC and the Caucus appears to substantiate their denial that the Caucus is the connected organization of CBC-PAC.

Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that the Caucus is the connected organization of CBC-PAC for purposes of 2 U.S.C.

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§ 431(7). In this connection, we recommend that the Commission find no probable cause to believe that CBC-PAC and its treasurers, Congressman Stokes and Congressman Clay violated 2 U.S.C. § 433(b)(2) and § 441b(b)(4) by failing to report the name, address, relationship and type of its connected organization; and by soliciting contributions outside its membership class.

(b) Acceptance of Corporate Contributions

2 U.S.C. § 441b(a) prohibits corporations and labor organizations from making contributions in connection with any federal election. Furthermore, § 441b(a) prohibits any political committee from knowingly accepting such contributions.

CBC-PAC and its treasurers, Congressman Clay and Congressman Stokes admit that they violated 2 U.S.C. § 441b(a) by accepting contributions from four incorporated entities. The Office of General Counsel, therefore, recommends that the Commission find probable cause to believe that the respondents violated 2 U.S.C. § 441b(a).

(c) Receipt of Corporate (in-kind) contribution from the Capitol Hill Hotel

Information provided by respondents reveals that the address of the Capitol Hill Hotel was used in anticipation of a large response to CBC-PAC's April 14, 1983, solicitation and that the Hotel agreed to accept the mail in hope of renting office space to CBC-PAC in the future. However, no mail, apart from that which was returned undeliverable, was ever received by the Hotel.

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The use of the Hotel's premises as a mail drop was avoided when Congressman Clay submitted a change of address card to the U.S. Post Office.

In view of this additional information it appears that CBC-PAC did not accept an in-kind contribution from the Capitol Hill Hotel in violation of 2 U.S.C. § 441b(a). Accordingly the Office of General Counsel recommends that the Commission find no probable cause to believe that a violation occurred in this matter.

(d) Failure to Include a 441d Disclaimer on Solicitation

2 U.S.C. § 441d requires that any direct mail solicitation bear a disclaimer stating the name of the person who paid for the communication and whether or not the communication had been authorized by any candidate or candidate committee.

Respondents admit that they violated 2 U.S.C. § 441d by failing to include the required disclaimer stating the name of the person paying for the cost of a solicitation dated April 14, 1983. The Office of General Counsel recommends that the Commission find probable cause to believe that respondents violated 2 U.S.C. § 441d. The violation in this instance was particularly significant in that the names of members of Congress, some of whom are candidates, appeared on the letterhead of the solicitation as members of CBC-PAC. Without the disclaimer, the identity of the persons paying for the solicitation could not be determined.

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(e) Reporting Violations

2 U.S.C. § 433(c) provides that any change in information previously submitted in a statement of organization must be reported no later than 10 days after the date of the change. Respondents admit that they failed to file a timely amendment to their statement of organization reflecting a change of treasurer. Accordingly, the Office of General Counsel recommends that the Commission find probable cause to believe that respondents violated 2 U.S.C. § 433(c).

2 U.S.C. § 432(g)(4) requires a political committee to file reports in original form with the Commission. Respondents admit a violation of this section when, during four consecutive reporting periods in 1982, they instead filed reports with the Clerk of House of Representatives. However, in mitigation Respondents note that all reports were ultimately received by the Commission from the Clerk of the House of Representatives within the statutorily required time period, and that the problem has been corrected in CBC-PAC's filing procedures.

A closer examination of reports filed by CBC-PAC, reveals that since its inception CBC-PAC has only supported candidates for nomination for election or election to the House of Representatives. In view of this fact, the operative provision governing document filing is found in the Commission's regulations at 11 C.F.R. § 105.1. This section states, in

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relevant part, that all reports filed by a political committee which supports only candidates for nomination for election or election to the House of Representatives, shall be filed in original form with, and received by, the Clerk of the House of Representatives as custodian for the Federal Election Commission.

It is not clear whether CBC-PAC's change in filing procedures reflects an intention to support more than just House candidates (e.g. Senate and Presidential candidates) in the future. If this is the case, then CBC-PAC should properly file reports, in original form, with the Commission. See 2 U.S.C. § 432(g)(4) and 11 C.F.R. § 105.4. If, however, CBC-PAC intends only to support House candidates, then its reports should be filed with the Clerk of the House of Representatives.

Since it appears that for the reporting periods in question CBC-PAC filed in accordance with 11 C.F.R. § 105.1, the Office of General Counsel recommends that the Commission find no probable cause to believe that CBC-PAC and its treasurer, Congressman Clay and Congressman Stokes violated 2 U.S.C. § 432(g)(4).

### III. GENERAL COUNSEL'S RECOMMENDATIONS

1. Find no probable cause to believe that the Congressional Black Caucus is the connected organization of the Congressional Black Caucus Political Action Committee for purposes of 2 U.S.C. § 431(7).
2. Find no probable cause to believe that the Congressional Black Caucus Political Action Committee and its treasurers,

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Congressman Clay and Congressman Stokes, violated 2 U.S.C. § 433(b)(2) by failing to report the name, address, relationship and type of its connected organization.

3. Find no probable cause to believe that the Congressional Black Caucus Political Action Committee and its treasurers, Congressman Clay and Congressman Stokes, violated 2 U.S.C. § 441b(b)(4) by soliciting contributions outside of the membership class of the Congressional Black Caucus.

4. Find probable cause to believe that the Congressional Black Caucus Political Action Committee and its treasurers, Congressman Clay and Congressman Stokes, violated 2 U.S.C. § 441b(a) by accepting corporate contributions.

5. Find no probable cause to believe that the Congressional Black Caucus Political Action Committee and its treasurers, Congressman Clay and Congressman Stokes, accepted an in-kind contribution from the Capitol Hill Hotel in violation of 2 U.S.C. § 441b(a).

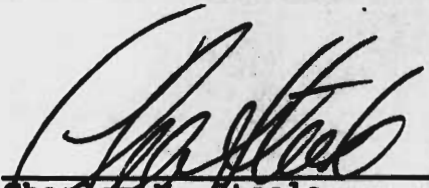
6. Find probable cause to believe that CBC-PAC and its treasurers, Congressman Clay and Congressman Stokes, violated 2 U.S.C. § 441d by failing to include the required disclaimer stating the name of the person paying for the costs of a solicitation dated April 14, 1983.

7. Find probable cause to believe that the Congressional Black Caucus Political Action Committee and its treasurers, Congressman Clay and Congressman Stokes, violated 2 U.S.C. § 433(c) by failing to file a timely amendment to their Statement of Organization reflecting a change in treasurer.

R 4040160263

8. Find no probable cause to believe that the Congressional Black Caucus Political Action Committee and its treasurers, Congressman Clay and Congressman Stokes, violated 2 U.S.C. § 432(g)(4) by failing to file reports with the Commission.

6 January 1984  
Date

  
Charles N. Steele  
General Counsel

Attachment

Respondents' supplemental response of November 7, 1983  
(6 pages)

84040460264

AMY ROBERTSON GOLDSON  
ATTORNEY AT LAW

MUR 1551

Kramer

4015 28TH PLACE NORTHWEST  
WASHINGTON, D. C. 20009  
(202) 944-7881

November 7, 1983

NOV 9 P 1:20

Ms. Beverly Kramer  
Federal Election Commission  
Office of the General Counsel  
1325 "K" Street, N.W.  
Suite 710  
Washington, D.C. 20463

Dear Ms. Kramer:

This is to confirm our telephone conversation in response to your inquiries relative to CBC-PAC.

1. To the best of the knowledge of the CPB-PAC, no mail was received by the CBC-PAC at the Capitol Hill Hotel at the unauthorized "mail drop" which Mr. David Green, the former consulting executive director for the CBC-PAC, had obtained on his own initiative. As previously stated, after it was learned that a letter bearing the address of the Capitol Hill Hotel for receipt of mail, Congressman William Clay submitted a change of address card to the U.S. Post Office so that all mail would be forwarded to the CBC-PAC mailbox located at the U.S. Post Office. A copy of this change of address card is enclosed herewith, identified as Exhibit A.

2. Following our telephone conversation, I personally attempted to reach by telephone, the D.C. Recorder of Deeds, Corporations Division, to verify the status of the Black Nurses Association of GWA. As I mentioned to you, Ms. Jenkins, the bookkeeper for the CBC-PAC, in response to her inquiry, had been previously advised by telephone, that the D.C. Recorder of Deeds showed no corporate status for the Black Nurses Association of GWA. In our telephone conversation, you stated that you were informed otherwise but that from time to time a response could vary depending upon the thoroughness of the D.C. Recorder of Deeds' employee who responds to a telephonic inquiry. In light of the foregoing discrepancy, Congressman Clay has sent an inquiry to the Black Nurses Association of GWA, a copy of which is enclosed (Exhibit B). I have also enclosed a copy of the check contribution received by the CBC-PAC from the Black Nurses Association of GWA. You will note that there is no indicia of corporate status reflected on either the check or the return card (see Exhibit C).



Ms. Beverly Kramer  
Federal Election Commission  
November 7, 1983  
Page Two

3. After the complaint against CBC-PAC was filed, all contributions were reviewed by CBC-PAC. Although H.R.R.F., Inc. was not cited in the complaint, the CBC-PAC nevertheless refunded this contribution since it had been written on what appeared to be a corporate account. The acceptance of this contribution by CBC-PAC was a matter of mere oversight based upon the fact that the response card reflected that it was a contribution from Richard Rubin, the drawer of the H.R.R.F., Inc. check (see Exhibit D). CBC-PAC does not know what the acronym, H.R.R.F. stands for.


The contribution from H.R.R.F. was received shortly after May 24, 1982 and reported on the CBC-PAC's July Quarterly Report for the period April 1, 1982 through June 30, 1982. This Twenty Dollar (\$20.00) contribution was included in the amount reflected on line 11a -- individual persons other than political committees -- since Richard Rubin's name appeared on the response card which accompanied the H.R.R.F. check.

4. In response to your question regarding the Black Affairs Center, Inc., please be advised that initially, the CBC-PAC had prepared to donate the Black Affairs Center, Inc. corporate contribution to charity. However, once the donor was located, a refund in the amount of One Hundred Dollars (\$100.00) was issued directly to the Black Affairs Center, Inc. A copy of this refund check was previously submitted to the FEC and the refund reflected as a disbursement on the CBC-PAC's July 31, 1983 Report.

I trust that the foregoing clarifies your inquiries. If we may be of further assistance, please do not hesitate to so advise.

As I mentioned to you, I shall be out of the country between November 11 and December 3, 1983. Should you have any questions prior to my return, Victor Sterling will be available during my absence. However, in the event that it is necessary for the CBC-PAC to submit a brief or take any such formal action, I respectfully request that a thirty (30) day extension be granted in order that I may fully review the situation upon my return.

Sincerely,

  
Amy Robertson Goldson

cc: The Honorable William Clay  
The Honorable Walter E. Fauntroy

Enclosures

(2)

84040460266

94040460267

(3)

|  |  |   |  |
|--|--|---|--|
| <b>THIS ORDER PROVIDES for the forwarding of first class mail and all perquisites of value for a period not to exceed 1 year.</b>  |  | <b>Print or Type (Last Name, First Name, Middle Initial)</b><br><b>CBC FETTERAL ACTION Committee</b>          |  |
| <input type="checkbox"/> <b>TRANSIT OF ADDRESS ONLY:</b><br><input type="checkbox"/> I am a family (or have been) of family members, either separate or joint, for each last name entry. |  | No. and St., Apt., Suite, P.O. Box or R.D. No. (if care of)<br>S.W.T.E. 600<br>2000 S. 5th St. S.E.           |  |
| <input type="checkbox"/> <b>Individual Signer Only:</b><br>I agree to pay forwarding postage for newspapers and magazines for 90 days.   |  | City, State, and ZIP Code<br>Washington, D.C.   |  |
| <input checked="" type="checkbox"/> <b>NO</b> <input type="checkbox"/> <b>VIS</b><br>USPS USE ONLY   |  | No. and St., Apt., Suite, P.O. Box or R.D. No. (if care of)<br>CBC FETTERAL ACTION Committee<br>P.O. Box 2000 |  |
| Clerk, Carrier Endorsement   |  | City, State, and ZIP Code<br>Washington, D.C. 20013   |  |
| Carrier Route Number   |  | Effective Date<br>6-7-83  |  |
| Date Entered   |  | If Temporary, Expiration Date<br>6-1-83   |  |
| Sign Here<br>[Signature]   |  | Date Signed<br>6-1-83   |  |

PS Form 3525, Sep. 1981

Exhibit A

CBC-PAC

CONGRESSIONAL BLACK CAUCUS -- POLITICAL ACTION COMMITTEE  
P.O. BOX 2006, WASHINGTON, D.C. 20013

November 3, 1983

Black Nurses Association of GWA  
PO Box 1673  
Washington, DC 20011

To whom it may concern:

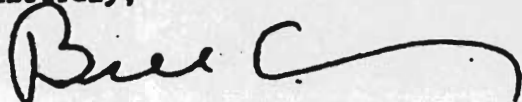
The Congressional Black Caucus Political Action Committee's financial report on contributions is being reviewed by the Federal Election Commission.

I would appreciate it if you could indicate in writing whether the Black Nurses Association of GWA was an incorporated entity as of July 1, 1982. A stamped self-addressed envelope has been enclosed.

If you were incorporated on the above date, your contribution of \$25.00 will be refunded to you or contributed to a charity, as you prefer. The Federal Election Commission prohibits political action committees from accepting corporate checks.

A prompt reply would be appreciated. Thank you for your cooperation.

Sincerely,



William L. Clay  
Chairman  
CBC-PAC

WLC/aj

EXHIBIT B

(4)

BLACK NURSES ASSOCIATION OF G W A

105

27 May 82

15-7087/2548

PAY TO THE  
ORDER OF

CBC - PAC

\$25.00

Twenty five and no/100

DOLLARS



INDEPENDENCE FEDERAL SAVINGS  
& LOAN ASSOCIATION  
OF WASHINGTON

FOR

1:2540700771:

0399 0097

Johnella Banks  
Shirley E. Echelle

ENCLOSED IS MY CHECK FOR:

- ☒ \$25   ☐ \$50   ☐ \$100   ☐ \$200   ☐ \$500   ☐ \$1,000  
☐ Other: \_\_\_\_\_

Name: THE BLACK NURSES ASSOCIATION OF THE GREATER WASHINGTON AREA

Address: POST OFFICE BOX 1673

City: WASHINGTON State: DC Zip: 20011

(5)



No. 534

1-2  
210

H.R.R.F., INC.

Pay to the  
order of

5/24/84 128  
Constitutional Black Caucus Palatka Center W. 41st St.

THE CHASE MANHATTAN BANK  
NATIONAL ASSOCIATION  
WORTH ST. AT CHURCH ST.  
NEW YORK, N.Y. 10013

⑆0210⑉0002⑆ 022⑉1⑉040322⑈

☐ \$25 ☐ \$50 ☐ \$100 ☐ \$200 ☐ \$500 ☐ \$1,000  
☒ Other: 20

Name: RICHARD RUBIN

Address: OLD CORNER ROAD RD 3

City: BEDFORD State: NY Zip: 10106

EXHIBIT D

6



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 10, 1984

Jonathan Z. Rubin  
Capitol Hill Hotel  
200 C Street, S.E.  
Washington, D.C. 20003

RE: MUR 1551

Dear Mr. Rubin:

Based on a complaint filed with the Commission on May 6, 1983, the Commission determined on August 22, 1983, that there was reason to believe that the Capitol Hill Hotel had violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

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 submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

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

Sincerely,

Charles N. Steele  
General Counsel

Enclosure  
Brief

84040460271



**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

January 10, 1984

Amy Robertson Goldson, Esq.  
Victor Sterling, Esq.  
4015 - 28th Place, N.W.  
Washington, D.C.

RE: MUR 1551  
Congressional Black Caucus  
Political Action Committee  
Congressman Louis Stokes  
Congressman William Clay

Dear Ms. Goldson and Mr. Sterling:

Based on complaints filed with the Commission on May 6, 1983, and information supplied by you the Commission determined on August 22, 1983, that there was reason to believe that your clients, the Congressional Black Caucus Political Action Committee ("CBC-PAC") and its treasurers, Congressman Clay and Congressman Stokes, had violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"), and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that your clients violated 2 U.S.C. § 441b(a), § 441d, and § 433(c). In addition, the Office of General Counsel is prepared to recommend that the Commission find no probable cause to believe that the Congressional Black Caucus is the connected organization of CBC-PAC for purposes of 2 U.S.C. § 431(7) or that your clients violated 2 U.S.C. § 433(b)(2), § 441b(b)(4) and § 432(g)(4). The Commission may or may not approve the General Counsel's recommendations.

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.

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Letter to Amy Goldson and Victor Sterling  
Page 2

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.

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 Beverly Karner at (202) 523-4057.

Sincerely



Charles N. Steele  
General Counsel

Enclosure  
Brief

84040460273



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Congressional Black Caucus )  
Congressional Black Caucus ) MURs 1550 and 1551 (83)  
Political Action Committee )  
Congressman Louis Stokes )  
Congressman William L. Clay )  
Capitol Hill Hotel )

CERTIFICATION

I, Marjorie W. Emons, Recording Secretary of the Federal  
Election Commission Executive Session on November 29, 1983, do hereby  
certify that there were no objections on the record to the Comprehensive  
Investigative Report #1 on the above-captioned matter.

Attest:

12-2-83

Date

Marjorie W. Emons

Marjorie W. Emons  
Secretary of the Commission

84040460274



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL  
FROM: MARJORIE W. EMMETT / JODY C. RANSOM *JCR*  
DATE: NOVEMBER 17, 1983  
SUBJECT: OBJECTION - MUR 1550/1551 Comprehensive  
Investigative Report #1 signed November 15,  
1983

The above-named document was circulated to the  
Commission on Wednesday, November 16, 1983 at 4:00.

Objections have been received from the Commissioners  
as indicated by the name(s) checked:

|                       |               |
|-----------------------|---------------|
| Commissioner Aikens   | _____         |
| Commissioner Elliott  | _____         |
| Commissioner Harris   | _____         |
| Commissioner McDonald | _____         |
| Commissioner McGarry  | _____         |
| Commissioner Reiche   | _____ X _____ |

This matter will be placed on the Executive Session  
agenda for Tuesday, November 29, 1983.

84040460275

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

83 NOV 16 A10: 50

In the Matter of )  
 )  
Congressional Black Caucus )  
Congressional Black Caucus )  
Political Action Committee )  
Congressman Louis Stokes )  
Congressman William L. Clay )  
Capitol Hill Hotel )

MURs 1550 and 1551 (83)

**SENSITIVE**

COMPREHENSIVE INVESTIGATIVE REPORT #1

This matter was initiated by two complaints filed by Robert C. Heckman of the Fund for a Conservative Majority and Paul D. Kamenar of the Washington Legal Foundation on May 6, 1983, alleging that the Congressional Black Caucus, the Congressional Black Caucus Political Action Committee, Congressman Louis Stokes, Congressman William L. Clay, and the Capitol Hill Hotel violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). In addition, the Commission received a referral from the Department of Justice on June 15, 1983, concerning a complaint submitted to the Department by Louis W. Barnett of Citizens for the Republic, alleging, inter alia, violations of the Act. 1/

Upon review of the allegations contained in the complaints, the Commission, on August 22, 1983, found reason to believe that:

- 1) the Congressional Black Caucus is the connected organization of the Congressional Black Caucus Political Action Committee for purposes of 2 U.S.C. § 431(7);

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1/ This referral, designated Pre-MUR 107, was merged with MURs 1550 and 1551 pursuant to the Commission's direction on August 22, 1983.

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- 2) the Congressional Black Caucus Political Action Committee and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 433(b)(2) by failing to report the name, address, relationship and type of its connected organization, the Congressional Black Caucus;
- 3) the Congressional Black Caucus Political Action Committee and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 441b(b)(4) by soliciting contributions outside of the membership class of the Congressional Black Caucus;
- 4) the Congressional Black Caucus Political Action Committee and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 441b(a) by accepting corporate contributions;
- 5) the Capitol Hill Hotel violated 2 U.S.C. § 441b(a) by making an in-kind contribution to the Congressional Black Caucus Political Action Committee by permitting the Committee to use the hotel as a mail drop;
- 6) the Congressional Black Caucus Political Action Committee and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 441d by failing to include the required disclaimer stating the name of the person paying for the costs of a solicitation dated April 14, 1983;
- 7) the Congressional Black Caucus Political Action Committee and treasurers Congressman Clay and Congressman

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Stokes violated 2 U.S.C. § 433(a) by failing to file a timely Statement of Organization, but take no further action;

8) the Congressional Black Caucus Political Action Committee and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 433(c) by failing to file a timely amendment to their Statement of Organization reflecting a change in treasurers; and

9) the Congressional Black Caucus Political Action Committee and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 432(g)(4) by failing to file reports with the Commission.

In addition, the Commission approved the issuance of a letter to the Congressional Black Caucus Political Action Committee, requesting a response to enclosed questions.

The Congressional Black Caucus Political Action Committee and treasurers Congressman Clay and Congressman Stokes 2/ have responded, through counsel, to the allegations involved. See Attachment I at pages 1-20. In addition, the Office of General Counsel has received responses from Congressman Julian Dixon, Chairman of the Congressional Black Caucus, and Johnathan Rubin of the Capitol Hill Hotel. See Attachments II and III at pages 21-25.

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2/ Congressman Clay served as treasurer of the Committee from November 17, 1981 to July 15, 1982. Congressman Stokes held this position from July 15, 1982 to May 4, 1983. The current treasurer of the Committee is Congressman William Fauntroy.

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The Congressional Black Caucus Political Action Committee ("CBC-PAC") admits the findings of fact with respect to alleged violations of 2 U.S.C. § 441b(a), § 441d, § 433(a), § 433(c) and § 432(g)(4), but calls the Commission's attention to mitigating factors surrounding these violations. CBC-PAC disputes the Commission's findings that the Congressional Black Caucus is its connected organization and, therefore, maintains that CBC-PAC did not violate 2 U.S.C. § 433(b)(2) or § 441b(b)(4). In addition, CBC-PAC refutes the allegation that it accepted an in-kind contribution from the Capitol Hill Hotel in violation of 2 U.S.C. § 441b(a). The Capitol Hill Hotel also disputes the finding that it violated 2 U.S.C. § 441b(a) in this connection.

Based on our review of the responses received, the Office of General Counsel is prepared to terminate its investigation with respect to all matters addressed in MURs 1550 and 1551. At this point it appears that the concerns raised by the Commission have been satisfactorily addressed. The General Counsel's brief will follow.

Charles N. Steele  
General Counsel

November 15, 1983  
Date

By:

Kenneth A. Gross  
Kenneth A. Gross  
Associate General Counsel

#### Attachments

- I. Response of CBC-PAC (20 pages)
- II. Response of Congressman Julian Dixon (2 pages)
- III. Response of the Capitol Hill Hotel (3 pages)

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AMY ROBERTSON GOLDSON  
ATTORNEY AT LAW

664 EOT  
83 SEP 19 P 4: 34

4015 28TH PLACE NORTHWEST  
WASHINGTON, D. C. 20008  
(202) 886-7551

ATTACHMENT I

September 16, 1983

SEP 19 2 5: 11

Robert E. Pease, Esquire  
Federal Election Commission  
1325 K Street, N.W. - 7th Floor  
Washington, D.C. 20463

RE: MUR 1551 and 1550

Dear Mr. Pease:

In response to the questions enclosed with the Commission's letter of August 24, 1983 in the above matter, submitted herewith are the answers of the Congressional Black Caucus Political Action Committee.

The Congressional Black Caucus Political Action Committee maintains that the Congressional Black Caucus, a legislative service organization, is not a connected organization of the CBC-PAC for purposes of 2 U.S.C. §431(7).

A legislative service organization is a grouping of Members of Congress who pool resources to pursue a common legislative goal. It is operated to provide legislative services to the Members thereof in the performance of their official duties. The Congressional Black Caucus legislative service organization maintains its own offices and staff (Executive Director, Secretary, and Administrative Assistant). At no time has "the Caucus" provided the CBC-PAC with the use of its offices, staff, equipment or supplies.

The participation by the black Members of Congress in the Congressional Black Caucus legislative service organization is no different from the participation by these same members in the Democratic Study Group, another legislative service organization. The fact that all of the black Members of Congress are members of the Democratic Study Group legislative service organization, does not demonstrate that the Democratic Study Group is a connected organization of the CBC-PAC. The Congressional Black Caucus legislative service organization, by virtue of who its members are, should not be determined a connected organization of the CBC-PAC. It is not and has never been intended to be or operated as such.

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①

Robert E. Pease, Esquire  
September 16, 1983  
Page 2

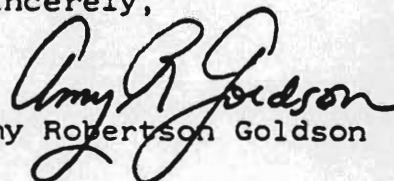
The use of the name, "Congressional Black Caucus Political Action Committee" came about as a result of an individual decision made by its organizers. In this regard, neither the approval or disapproval of the Congressional Black Caucus legislative service organization was ever sought or obtained. Ostensibly, the legislative service organization could take action to prevent the continued use of the name, Congressional Black Caucus Political Action Committee. Query: If the respondent, political committee had utilized another name such as the "Blacks in Congress Political Action Committee" (BIC-PAC), would the Commission, based upon the facts elicited in the present matter, have nevertheless determined that there is reason to believe that BIC-PAC is a connected organization of the Congressional Black Caucus? By virtue of its name, CBC-PAC should not be deemed connected to "the Caucus."

While all of the black Members of Congress financially contribute to the Congressional Black Caucus legislative service organization, only nine Members have financially contributed to the CBC-PAC. Any involvement in the CBC-PAC is purely the result of an individual decision of each Member. The Congressional Black Caucus legislative service organization has no right to control or influence the operation of CBC-PAC.

For the record and your review, please find copies of cancelled checks which represent refunds of corporate contributions which were inadvertently accepted. In addition, you will find identification of A. J. McKnight.

I trust that the attached answers will assist the Commission in bringing this matter to a favorable conclusion. However, should any additional questions arise or if we can provide further clarification on any of the issues in this matter, please feel free to contact me or Victor Sterling.

Sincerely,

  
Amy Robertson Goldson

ARG:crw

Enclosures as stated

②



Before The  
FEDERAL ELECTION COMMISSION  
UNITED STATES OF AMERICA

CONGRESSIONAL BLACK CAUCUS POLITICAL  
ACTION COMMITTEE a/k/a CBC-PAC

CONGRESSMAN LOUIS STOKES

RE: MUR .

CONGRESSMAN WILLIAM L. CLAY

ANSWERS TO QUESTIONS

The Congressional Black Caucus Political Action Committee (CBC-PAC), by counsel in response to questions propounded in the above matters, answers as follows:

QUESTION No. 1 - State the total amount of administrative costs incurred by CBCPAC from date of inception through May 1983, including, but not limited to: the costs of office supplies; desks; telephone; office equipment; and rent for office space. State whether any of CBCPAC's administrative costs were paid by the Congressional Black Caucus, Inc.

ANSWER: The following administrative costs were incurred by the CBC-PAC from the date of inception through May, 1983:

| PAYEE                               | PURPOSE                                | COST                                   |
|-------------------------------------|--|--|
| U. S. Postmaster                    | P. O. Box Rental                       | \$ 22.00                               |
| Independence Federal Savings & Loan | Check Printing                         | 18.92                                  |
| Tom Skinner Associates              | Direct mailing/consulting              | 2,000.00<br>2,500.00<br>2,365.00       |
| Georgiana Anderson-Land             | Consulting fees for services           | 234.00<br>500.00<br>2,000.00<br>600.00 |
|                                     | Reimbursement for postage              | 40.00                                  |
|                                     | Reimbursement for postage/<br>printing | 231.58                                 |
|                                     | Reimbursement for parking              | 60.00                                  |

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| PAYEE                    | PURPOSE  | COST      |
|--------------------------|--|-----------|
| David R. Ramage, Inc.    | Printing - mailing cards,<br>envelopes, letterhead | 278.00    |
|                          | Printing - invitations                             | 82.00     |
| Metro Business Forms     | Letterhead cancellation fee                        | 95.00     |
|                          | Letterhead printing                                | 382.32    |
| U. S. Postmaster         | Postage stamps                                     | 120.00    |
|                          | P. O. Box rental                                   | 20.00     |
| Anise Jenkins            | Consulting fee for administrative services         | 250.00    |
| Mal Warwick & Associates | Direct mail consulting & management services       | 10,000.00 |
| U. S. Postmaster         | Postage  | 660.00    |
| Genova, Inc.             | Printing letters                                   | 500.00    |

The following administrative related costs were incurred during the period in question, although payment was not made until a date following the period in question:

| PAYEE                    | PURPOSE  | COST               |
|--------------------------|--|--------------------|
| David Greene             | Reimbursement for expenses for printing and travel | 495.64             |
| Metro Business Forms     | Payment for printing stationery                    | 2,235.50           |
| Anise Jenkins            | Financial/record keeping administrative services   | 50.00              |
| Minnie Taylor            | Clerical services rendered                         | 480.00             |
| Gladys Freeman           | Clerical services rendered                         | 400.00             |
| Regina Collins           | Clerical services rendered                         | 320.00             |
| Mal Warwick & Associates | Direct mail consulting & management services       | 256.09<br>1,952.94 |
| A. B. Dick Company       | Use of supplies, equipment, training               | 1,599.39           |
| TOTAL                    |  | \$30,748.38        |

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The CBC-PAC is managed such that elaborate office space, telephones, typewriters, dictating and duplicating equipment were not required for administrative purposes. Since its inception, the CBC-PAC has never employed a staff person for any reason. Georgiana Anderson-Land and David Greene were retained on a commission basis for the purpose of soliciting funds. Income for both was based upon the amount of money that they personally raised. By contrast, "the Caucus" legislative service organization employs a full time staff consisting of Harriet Pritchett, Executive Director; Sheila Senesie, Secretary; and Valeri Byod, Administrative Assistant. These individuals have not done any work in connection with the CBC-PAC.

As reflected in the FEC reports, the majority of the contributions received by the CBC-PAC came as a result of direct mail solicitations. The administrative costs in this regard, are reflected in the fees paid to the two direct mail firms, Mal Warwick & Associates and Tom Skinner Associates.

Clerical and bookkeeping requirements for the entire period that the CBC-PAC has been in existence have been miniscule. The number of hours of service total less than thirty (30) hours of work, which was performed by Anise Jenkins. Such services have been retained on a piece work hourly basis only and payment made for work actually performed.

The initial "seed" money utilized by the Congressional Black Caucus Political Action Committee (CBC-PAC) to fund its start up operations came from one-thousand (\$1,000.00) dollar contributions separately made by the campaign committees of Congressman William



Clay (Nov. 18, 1981), Congressman Walter E. Fauntroy (Dec. 18, 1981) and Congressman Louis Stokes (Dec. 18, 1981).

At no time did "the Caucus" provide assistance in establishing the CBC-PAC nor did it contribute any "seed" money, office supplies, equipment, or services to the CBC-PAC. While "the Caucus" maintains offices from which it operates the legislative service organization, no activities have ever been conducted from those offices, either directly or indirectly on behalf of the CBC-PAC.

The name, Congressional Black Caucus Political Action Committee (CBC-PAC) was selected by the consensus of its founders based upon the assumption that it would have mass appeal and recognition. The name is reflective of the ideological viewpoint of the CBC-PAC whose interest lies in changing the make-up of Congress to favor the cause of black and poor people.

"The Caucus" does not have the power, authority or ability to hire, appoint, discipline, discharge, remove or influence the decisions of the officers or members of the CBC-PAC.

QUESTION No. 2 - State the principal place of business and occupation of David E. Greene. State his relationship to CBCPAC. State the salary, if any, paid to Mr. Greene by CBCPAC for services rendered to CBCPAC.

ANSWER: David E. Greene's principal place of business and occupation are unknown. Mr. Greene has never been employed by "the Caucus," Congressman Stokes, Congressman Clay or any other member of the Congressional Black Caucus.

In March, 1983, Mr. Greene was retained by the CBC-PAC to serve as a consulting executive director. As an independent contractor, Mr. Greene's compensation was based on the amount of



contributions that he personally raised. No compensation has been paid to Mr. Greene, although he was reimbursed for expenses incurred in the amount of \$495.64. As of June 9, 1983, Mr. Greene's relationship with the CBC-PAC was formally terminated. Previously, Mr. Greene had been verbally instructed to cease all formal activities with the CBC-PAC effective May 26, 1983.

**QUESTION No. 3** - State the names, addresses, and positions of all individuals who have performed services for CBCPAC attributable to administrative costs. Indicate for each individual whether he or she performed as a salaried employee, an independent contractor or a volunteer.

**ANSWER:** The individuals who have performed services for the CBC-PAC attributable to administrative costs are:

| NAME & ADDRESS  | POSITION                 | STATUS  |
|---|--------------------------|---|
| William L. Clay<br>633 Whittingham Drive<br>Silver Spring, MD 20904                 | Chairman/<br>Treasurer   | Volunteer   |
| Tom Skinner Associates<br>505 8th Avenue<br>New York, NY 10001                      | Direct mail<br>firm      | Independent contractor  |
| Georgiana Anderson-Land<br>8715 1st Avenue<br>No. 1401 D<br>Silver Spring, MD 10910 | Businesswoman            | Independent contractor  |
| Anise Jenkins<br>201 I Street, S.W.<br>No. 210<br>Washington, D.C. 20024            | Bookkeeper               | Independent contractor vis-a-vis CBC-PAC - services performed as needed on her own time, although employed by Cong. Clay during regular business hours. |
| Minnie Taylor<br>12704 Princeleigh<br>Upper Marlboro, MD 20722                      | Clerical/<br>keypunching | Independent contractor (retired)  |
| Gladys Freeman<br>1669 New Windsor Court<br>Crofton, MD 21114                       | Clerical/<br>keypunching | Independent contractor (retired)  |

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84040460287

| NAME & ADDRESS   | POSITION                            | STATUS  |
|--|-------------------------------------|---|
| David Greene<br>3620 Peartree Court<br>No. 42<br>Silver Spring, MD 20904 | Consulting<br>Executive<br>Director | Independent contractor/<br>terminated                               |
| A. B. Dick Company<br>8100 Gatehouse Road<br>Falls Church, VA 22042      | Information<br>systems<br>company   | Independent contractor  |
| Regina Collins<br>1117 Kennebec Street<br>No. 4C<br>Oxon Hill, MD 20745  | Clerical/<br>keypunching            | Independent contractor<br>(Employee of National<br>Bar Association) |
| Mal Warwick & Associates<br>P. O. Box 1282<br>Berkeley, CA 94701         | Direct mail<br>firm                 | Independent contractor  |

QUESTION No. 4 - State the names, addresses and phone numbers of the founder(s) of the CBCPAC.

ANSWER: The following persons were the founders of the CBC-PAC:

Congressman William Clay, Chairman  
633 Whitingham Drive  
Silver Spring, MD 20904  
(301) 622-1051

Congressman Walter E. Fauntroy  
4105 17th Street, N.W.  
Washington, D.C. 20011  
(202) 723-5608

Congressman Louis Stokes, Treasurer  
11924 Viewcrest Terrace  
Silver Spring, MD 20902  
(301) 593-1344

Congressman Mervyn Dymally, Vice Chairman  
1245 4th Street, S.W.  
No. E-307  
Washington, D.C. 20024  
(202) 484-6017

QUESTION No. 5 - Identify all Members of Congress who have performed services for CBCPAC, including, but not limited to, the use of their names for solicitation purposes. Identify the nature of the services rendered.

ANSWER: The following Members of Congress have performed services for CBC-PAC:

84040460288

Congressman William Clay - Chairman, Treasurer - was the primary organizer of the CBC-PAC. He has been involved, on a voluntary basis, with soliciting funds, eliciting the interest of other Members of Congress and generally managing the affairs of the CBC-PAC.

Congressman Louis Stokes - Treasurer

Congressman Walter E. Fauntroy - Treasurer

Congresswoman Cardiss Collins - Treasurer

Congressman Mervyn Dymally - Vice Chairman, Secretary

The foregoing persons have voluntarily assisted Congressman Clay from time to time in an advisory capacity on matters relating to the operation of the CBC-PAC, fundraising and planning.

Contributions have been made to the CBC-PAC by the authorized committees of the following Members of Congress:

Julian C. Dixon Democrat for Congress (\$1,000 loan);

Crockett for Congress Committee (\$1,000 loan);

Bill Gray for Congress Committee (\$1,000);

Dymally for Congress (\$1,000);

Leland for Congress (\$1,000);

Parren Mitchell Campaign for Congress (\$1,000).

Since the inception of the CBC-PAC, there have been twenty-two black Members of Congress and members of the Congressional Black Caucus legislative service organization. Of these twenty-two black members, the authorized political committees of nine members have made either loans or outright contributions to the CBC-PAC.



84040160289

The stationery utilized by the CBC-PAC for general correspondence and solicitation purposes, has contained the names of the following Members of Congress:

Congressman William "Bill" Clay, Chairman  
Congressman Mervyn M. Dymally, Vice Chairman  
Congressman Louis Stokes, Treasurer  
Congresswoman Cardiss Collins  
Congressman John Conyers, Jr.  
Congressman George W. Crockett, Jr.  
Congressman Ronald V. Dellums\*  
Congressman Julian C. Dixon  
Congressman Walter E. Fauntroy  
Congressman Harold E. Ford\*  
Congressman William H. Gray, III  
Congresswoman Katie Hall  
Congressman Augustus F. Hawkins\*  
Congressman Mickey Leland  
Congressman Parren Mitchell  
Congressman Major R. Owens  
Congressman Charles B. Rangel  
Congressman Edolphus Towns  
Congressman Harold Washington (former member)  
Congressman Alan Wheat

\* Did not authorize the use of his name by CBC-PAC for any purpose, including solicitation. The member was unaware that the CBC-PAC letterhead contained his name and has requested that it not be used in the future.



Those Members of Congress who have permitted the use of their names by the CBC-PAC, support the endeavors of the CBC-PAC. In their individual capacities, it is anticipated that from time to time, such members will act on a voluntary basis as advisors to identify external resources and otherwise assist in the formulation of policy, and in the implementation of fundraising programs and other activities for the CBC-PAC.

QUESTION No. 6 - State the time period that the Capitol Hill Hotel was used as a mail drop for CBCPAC. State the cost for the use of the Capitol Hill Hotel as a mail drop for the April 14, 1983 solicitation and for all other solicitations. Please state the approximate number of pieces of mail that were delivered to Suite 600, 200 C Street, S.E., Washington, D.C. 20003, addressed to CBCPAC. State whether the Congressional Black Caucus, Inc., ever used Suite 600, 200 C Street, S.E., Washington, D.C. 20003, for receipt of mail.

ANSWER: The Capitol Hill Hotel was used as a mail drop for approximately two weeks during the period April 14, 1983 - April 30, 1983. One letter of solicitation dated April 14, 1983 was mailed. To the best of respondent's knowledge, no pieces of mail were delivered to 200 C Street, S.E., Washington, D.C. 20003. The Congressional Black Caucus, Inc., which maintains its own offices has never used Suite 600, 200 C Street, S.E., Washington, D.C. 20003 for receipt of mail.

No costs were incurred for the use of Suite 600, 200 C Street, S.E. as a mail drop for the CBC-PAC. The use of that address was the result of the unauthorized actions of David Greene who attempted to negotiate office space at the hotel. In fact, when the April 14, 1983 letter of solicitation was first seen by Congressman Clay, Mr. Greene was specifically advised that the CBC-PAC had a post office address for the receipt of mail.

Subsequently, Congressman Clay sent a change of address card to the U. S. Post Office in order that all mail would be received directly at the CBC-PAC post office box.

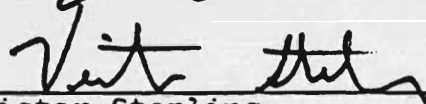
Congressman Clay also advised Mr. Greene that the contents of the April 14, 1983 letter must be reviewed prior to mailing. After reviewing the proposed letter of April 14, 1983, Congressman Stokes raised certain questions. A meeting was then arranged between Congressmen Stokes, Clay and Fauntroy to discuss and resolve certain concerns. Following this meeting, David Greene was then contacted by Congressman Clay relative to certain recommended changes to the letter. However, Mr. Greene stated that it was too late and that the letter had been mailed.

Respectfully submitted,

Congressional Black Caucus  
Political Action Committee

By:

  
Amy Robertson Goldson

  
Victor Sterling

4015 28th Place, N.W.  
Washington, D.C. 20008

Attorneys For Respondents

13

CONGRESSIONAL BLACK CAUCUS POLITICAL  
ACTION COMMITTEE CIBC - PAC

P.O. BOX 2006  
WASHINGTON, D.C. 20013

1047

12-2007/0510

PAY TO THE ORDER OF Bernice J. 10/19/02-11/10/04/05/07/09 1205102542 12-25-04

Twenty five

2 DOLLARS

**FSL** INDEPENDENCE FEDERAL SAVINGS  
& LOAN ASSOCIATION  
OF WASHINGTON

William D. Kelly  
Pay to order

FOR Refund - Inc.

⑈001017⑈ ⑈25407007⑈ 0298 00812⑈ ⑈0000002500⑈

PS-4518



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FOR DEPOSIT ONLY  
FISHERMERCHANTS NATIONAL BANK

**BONNER & HAITHCOCK M.D.'s LTD.**

0300 6056

7-27 PAY ANY BANK P.E.G. 7-27  
F.R.5-BALTIMORE MD 05200275  
06-02-83 004 06 0500 105102548

**7-16**

PAY ANY BANK  
BALTIMORE, MD.  
052000160

JE '03 02  
PROTECTED BY  
THE PATENT OFFICE  
WASHINGTON, D.C.





DR. HAROLD A. CARTER  
 NEW SHILOH BAPTIST CHURCH  
 Fremont Avenue and Lanvale Street  
 Baltimore, Maryland 21217

2 63353

7-27 PAY ANY BANK P.E.G. 7-27  
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 THE FEDERAL RESERVE BANK  
 WASHINGTON, D.C.

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PAY ANY BANK  
 MARYLAND NATIONAL BANK  
 BALTIMORE, MD.  
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7-16



CONGRESSIONAL BLACK CAUCUS POLITICAL  
ACTION COMMITTEE CBC - PAC

P.O. BOX 2006

WASHINGTON, D.C. 20013

1046

May 18 1983

W-7001/2540

PAY TO THE ORDER OF Black Officers Center, Inc. 205854350

\$100.00

One Hundred

**F&L** INDEPENDENCE FEDERAL SAVINGS  
& LOAN ASSOCIATION  
OF WASHINGTON

DOLLARS

For Refund - Inc.

William J. Clay  
James Taylor

⑈001046⑈ ⑆254070077⑆ 0298 00812⑆

⑈0000010000⑈

Deposited only  
066 6122

7-27 PAY ANY BANK P.E.S. 7-27  
F.R.B. BALTIMORE MD 052000273  
FEDERAL RESERVE BANK OF WASH DC 0527  
INVESTMENT  
DEPT OF COMMERCE  
WASHINGTON, D.C.  
PAY ANY BANK P.E.S.  
WASHINGTON, D.C.  
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THE MIDS NATL BANK  
WASHINGTON, D.C.

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CONGRESSIONAL BLACK CAUCUS POLITICAL  
ACTION COMMITTEE CBC - PAC

P.O. BOX 2006

WASHINGTON, D.C. 20013

08-08-23 004 08 0550

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1049

15-7007/2546

H.A.R.F. INC.

DAY TO THE  
ORDER OF

Twenty

\$ 20

DOLLARS

FNL INDEPENDENCE FEDERAL SAVINGS  
& LOAN ASSOCIATION  
OF WASHINGTON

FOR Repaid - Inc

William L. King

Inc. - King

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⑈0000002000⑈

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NEW YORK, NEW YORK  
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27 WASHINGTON

ECOH

B-9247

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# Congressional Black Caucus

H2-344 House Annex #2

Washington, D.C. 20515

202 — 225-7790

RECEIVED THE FEC

83 SEP 20 P 1: 25

1550/  
MUR 1551

Julian C. Dixon, Calif., Chairman  
Mickey Loland, Tex., 1st Vice-Chairman  
William H. Gray, III, Pa., 2nd Vice-Chairman  
Solaphus Towns, N.Y., Secretary  
Harold Washington, Ill., Treasurer

Augustus F. Hawkins, Calif.

John Conyers, Jr., Mich.

William L. Clay, Mo.

Louis Stokes, Ohio

Ronald V. Dellums, Calif.

Walter E. Fauntroy, D.C.

Parren J. Mitchell, Md.

Charles B. Rangel, N.Y.

Cordell Collins, Ill.

Harold E. Ford, Tenn.

George W. Coker, Jr., Mich.

Mervyn M. Dymally, Calif.

Gus Savage, Ill.

Kate Hall, Ind.

Major R. Owens, N.Y.

Alan Wheat, Mo.

## ATTACHMENT II

September 16, 1983

Mr. Robert Pease  
Office of the General Counsel  
Federal Election Commission  
Washington, D.C. 20463

Dear Mr. Pease:

This is in response to your letter of August 24, 1983 wherein the Commission has determined that there is reason to believe that the Congressional Black Caucus Political Action Committee (CBC-PAC) failed to report the name, address and relationship of its connected organization, the Congressional Black Caucus.

The Congressional Black Caucus legislative service organization incorporates by reference its previous response and maintains that it is not connected with the CBC-PAC. The Congressional Black Caucus, as a collective body, never organized or established the CBC-PAC. The Caucus maintains its own offices at: H2-344, House Annex II, U.S. House of Representatives, Washington, D.C. It has three(3) full time employees, Harriet Pritchett; Valerie Byrd, and Sheila Senessie. The Congressional Black Caucus has at no time provided the CBC-PAC with administrative support, office space, supplies, equipment, or in-kind services.

For your information, in January, 1982, the Congressional Black Caucus legislative service organization donated two certificates of deposit (approximate value \$82,155.00 at maturity) to the Congressional Black Caucus Foundation, Inc., a non-profit charitable organization. On the other hand, the Congressional Black Caucus has never provided seed money or financial support to the CBC-PAC. Had the Congressional Black Caucus ever intended to establish a separate segregated fund, arguably, it would appear that it would have paid the costs of establishing, administering, and soliciting contributions for the Congressional Black Caucus Political Action Committee.

83 SEP 20 P 1: 55

600-110-100



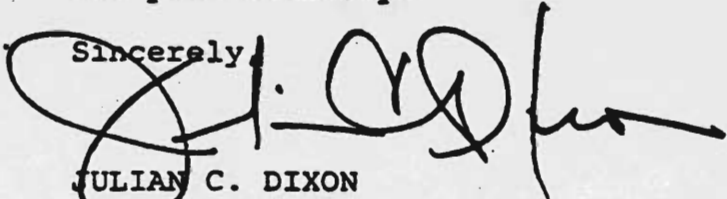
Mr. Robert Pease  
Page Two  
September 16, 1983

The Congressional Black Caucus legislative service organization neither sets policy nor initiatives for the CBC-PAC, nor does it control or involve itself in the operation or functions of the CBC-PAC. The Congressional Black Caucus legislative service organization does not assist the CBC-PAC in fundraising, does not require or request that its members contribute to the CBC-PAC, and does not make suggestions or recommendations regarding those candidates to whom the CBC-PAC will contribute.

While many of the Black members of Congress are involved in the Congressional Black Caucus Political Action Committee's endeavors, their participation is an individual decision and unrelated to their involvement with the legislative service organization.

I hope that the foregoing clarifies any concerns that the Commission might have. Should you have any further inquiries, please do not hesitate to so advise. Thank you in advance for your courtesy.

Sincerely,

  
JULIAN C. DIXON  
Chairman  
Congressional Black Caucus

JCD:tss



83 SEP 23 9:52  
RP

September 20, 1983

ATTACHMENT III

Mr. Robert E. Pease  
Office of General Counsel  
1325 K Street, NW  
Suite 710  
Washington, DC 20463

1550/  
mur, 1551

Dear Mr. Pease:

Pursuant to our conversation of late, regarding The Capitol Hill Hotel and the Congressional Black Caucus Political Action Committee, I would like to state for the record, the events as they unfolded.

Sometime in early April a Mr. David Greene approached me and inquired about leasing office space for the CBC-PAC. We discussed at length the services and rates The Capitol Hill could provide. As indicated in our conversation, this is standard business practice for organizations that do not want to rent commercial space and would rather have the luxury and convenience of a hotel/office. At this time I merely regarded this as a bonafide inquiry that could prove businessworthy.

Within one week of our initial discourse, Mr. Greene contacted me and voiced his interest and intention to lease from The Capitol Hill for a period of one to two years. He did, however, state that the office would not be needed until mid-July, 1983 and he would be receiving mail prior to the start-up date. Consequently, he requested whether his mail (CBC-PAC) could be sent to The Capitol Hill until his office opened. A most reasonable and above board request.

As a courtesy, Mr. Pease, I agreed, for it is common to extend special consideration to an individual or organization that would soon be a permanent resident. In this case, within 90 days. A hotel will accept mail for a transient guest that has not arrived, but is due to arrive. I was given the impression and led to believe that Mr. Greene would be leasing a suite at The Capitol Hill. Please see attached letter.

My only intention from the beginning of this debacle, was to secure a piece of business for my organization for that is my function.

(23)

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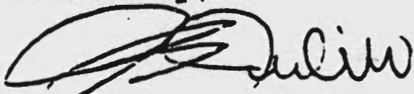
Mr. Pease  
Page Two

As for not billing or invoicing after CBC-PAC intentions were brought to light, I can only respond that I was led to believe CBC-PAC was a fictitious organization (I'm still not sure) and more importantly, this matter had become extremely irritating and I did not want this unfortunate incident to continue.

As the investigative body for the Federal Elections Commission I assure you that my sole intention was to secure a piece of business, no more, no less. I willingly submit to any further questions.

Thank you for your kind assistance in this matter.

Sincerely,



Jonathan Z. Rubin  
Regional Director of  
Sales and Marketing

84040160303

24



# CBC-POLITICAL ACTION COMMITTEE

Congressman William "Bill" Clay, Chairman  
 Congressman Mervyn M. Dymally, Vice-Chairman  
 Congressman Louis Stokes, Treasurer

April 28, 1983

## MEMBERS

Congressman William "Bill" Clay  
 Congresswoman Cardiss Collins  
 Congressman John Conyers  
 Congressman George W. Crockett, Jr.  
 Congressman Ronald V. Dellums  
 Congressman Julian C. Dixon  
 Congressman Mervyn M. Dymally  
 Congressman Walter E. Fauntroy  
 Congressman Harold E. Ford  
 Congressman William H. Gray III  
 Congresswoman Katie Hall  
 Congressman Augustus F. Hawkins  
 Congressman Mickey Leland  
 Congressman Parren J. Mitchell  
 Congressman Major A. Owens  
 Congressman Louis Stokes  
 Congressman Edolphus Towns  
 Congressman Harold Washington  
 Congressman Alan Wheat

Mr. Jonathan Z. Rubin  
 Director of Sales  
 200 C Street, SE  
 Washington, D.C. 20003

Dear Jonathan:

Pursuant to our discussions, the CBC-PAC is interested in receiving a price quote from your hotel on the cost of an executive suite for office purposes.

In the event that we do arrive at acceptable terms, occupancy would commence on or before July 15, 1983.

I look forward to talking with you again in the near future.

Sincerely,

David Greene  
 Executive Director

DG/aj

840401603

25

Address: Suite 600, 200 C Street, S.E., Washington, D.C. 20003

We have no permanent enemies/We have no permanent friends/Only permanent interests.



62-1080  
MUR 1551

AMY ROBERTSON GOLDSON  
ATTORNEY AT LAW

4015 26TH PLACE NORTHWEST  
WASHINGTON, D. C. 20008  
(202) 898-7881

November 7, 1983

53 NOV 9 P 1:20

GENERAL COUNSEL

Ms. Beverly Kramer  
Federal Election Commission  
Office of the General Counsel  
1325 "K" Street, N.W.  
Suite 710  
Washington, D.C. 20463

Dear Ms. Kramer:

This is to confirm our telephone conversation in response to your inquiries relative to CBC-PAC.

1. To the best of the knowledge of the CPB-PAC, no mail was received by the CBC-PAC at the Capitol Hill Hotel at the unauthorized "mail drop" which Mr. David Green, the former consulting executive director for the CBC-PAC, had obtained on his own initiative. As previously stated, after it was learned that a letter bearing the address of the Capitol Hill Hotel for receipt of mail, Congressman William Clay submitted a change of address card to the U.S. Post Office so that all mail would be forwarded to the CBC-PAC mailbox located at the U.S. Post Office. A copy of this change of address card is enclosed herewith, identified as Exhibit A.

2. Following our telephone conversation, I personally attempted to reach by telephone, the D.C. Recorder of Deeds, Corporations Division, to verify the status of the Black Nurses Association of GWA. As I mentioned to you, Ms. Jenkins, the bookkeeper for the CBC-PAC, in response to her inquiry, had been previously advised by telephone, that the D.C. Recorder of Deeds showed no corporate status for the Black Nurses Association of GWA. In our telephone conversation, you stated that you were informed otherwise but that from time to time a response could vary depending upon the thoroughness of the D.C. Recorder of Deeds' employee who responds to a telephonic inquiry. In light of the foregoing discrepancy, Congressman Clay has sent an inquiry to the Black Nurses Association of GWA, a copy of which is enclosed (Exhibit B). I have also enclosed a copy of the check contribution received by the CBC-PAC from the Black Nurses Association of GWA. You will note that there is no indicia of corporate status reflected on either the check or the return card (see Exhibit C).

84040460305

Ms. Beverly Kramer  
Federal Election Commission  
November 7, 1983  
Page Two

3. After the complaint against CBC-PAC was filed, all contributions were reviewed by CBC-PAC. Although H.R.R.F., Inc. was not cited in the complaint, the CBC-PAC nevertheless refunded this contribution since it had been written on what appeared to be a corporate account. The acceptance of this contribution by CBC-PAC was a matter of mere oversight based upon the fact that the response card reflected that it was a contribution from Richard Rubin, the drawer of the H.R.R.F., Inc. check (see Exhibit D). CBC-PAC does not know what the acronym, H.R.R.F. stands for.

The contribution from H.R.R.F. was received shortly after May 24, 1982 and reported on the CBC-PAC's July Quarterly Report for the period April 1, 1982 through June 30, 1982. This Twenty Dollar (\$20.00) contribution was included in the amount reflected on line 11a -- individual persons other than political committees -- since Richard Rubin's name appeared on the response card which accompanied the H.R.R.F. check.

4. In response to your question regarding the Black Affairs Center, Inc., please be advised that initially, the CBC-PAC had prepared to donate the Black Affairs Center, Inc. corporate contribution to charity. However, once the donor was located, a refund in the amount of One Hundred Dollars (\$100.00) was issued directly to the Black Affairs Center, Inc. A copy of this refund check was previously submitted to the FEC and the refund reflected as a disbursement on the CBC-PAC's July 31, 1983 Report.

I trust that the foregoing clarifies your inquiries. If we may be of further assistance, please do not hesitate to so advise.

As I mentioned to you, I shall be out of the country between November 11 and December 3, 1983. Should you have any questions prior to my return, Victor Sterling will be available during my absence. However, in the event that it is necessary for the CBC-PAC to submit a brief or take any such formal action, I respectfully request that a thirty (30) day extension be granted in order that I may fully review the situation upon my return.

Sincerely,

  
Amy Robertson Goldson

cc: The Honorable William Clay  
The Honorable Walter E. Fauntroy

Enclosures

84040460306

84040460307

|   |  |  |                                      |
|---|--|--|--------------------------------------|
| <b>THIS ORDER PROVIDES for the forwarding of First-Class Mail and all parcels of obvious value for a period not to exceed 1 year.</b>   |  | <b>Print or Type (Last Name, First Name, Middle Initial)</b><br><b>CBC Felicitous Action Committee</b>                 |                                      |
| <b>CHANGE OF ADDRESS IN THE:</b><br><input type="checkbox"/> Entire Family (Must list name of family members, either separate entries for each last name (first, middle, last))<br><input type="checkbox"/> Individual Separate Units |  | <b>No. and St., Apt., Suite, P.O. Box or R.D. No. (In care of)</b><br>SUITE 600<br>200 C STREET S.E.                   |                                      |
| <input type="checkbox"/> I agree to pay forwarding postage for newspapers and magazines for 90 days.<br><input checked="" type="checkbox"/> NO <input type="checkbox"/> YES   |  | <b>City, State, and ZIP Code</b><br>Washington D.C.  |                                      |
| <b>USPS USE ONLY</b><br>Clerk/Carrier Endorsement   |  | <b>No. and St., Apt., Suite, P.O. Box or R.D. No. (In care of)</b><br>CBC Felicitous Action Committee<br>P.O. Box 2006 |                                      |
| Carrier Route Number  |  | <b>City, State, and ZIP Code</b><br>Washington, D.C. 20013   |                                      |
| Date Entered  |  | <b>Effective Date</b><br>6-1-83  | <b>If Temporary, Expiration Date</b> |
| Sign Here<br>J. L. Lacey  |  | <b>Date Signed</b><br>6-1-83   |                                      |

PS Form 3575, Sep. 1981

 Necessary for return to sender if address change. DO NOT print or type.  
 U.S. GOVERNMENT PRINTING OFFICE: 1980-344-071

EXHIBIT A



**CBC-PAC**

CONGRESSIONAL BLACK CAUCUS - POLITICAL ACTION COMMITTEE  
P.O. BOX 2006, WASHINGTON, D.C. 20013

November 3, 1983

Black Nurses Association of GWA  
PO Box 1673  
Washington, DC 20011

To whom it may concern:

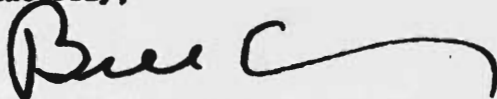
The Congressional Black Caucus Political Action Committee's financial report on contributions is being reviewed by the Federal Election Commission.

I would appreciate it if you could indicate in writing whether the Black Nurses Association of GWA was an incorporated entity as of July 1, 1982. A stamped self-addressed envelope has been enclosed.

If you were incorporated on the above date, your contribution of \$25.00 will be refunded to you or contributed to a charity, as you prefer. The Federal Election Commission prohibits political action committees from accepting corporate checks.

A prompt reply would be appreciated. Thank you for your cooperation.

Sincerely,



William L. Clay  
Chairman  
CBC-PAC

WLC/aj

EXHIBIT B

84040460308

8404046039  
KHLBIC

BLACK NURSES ASSOCIATION OF G W A

105

27 May 1982

16-7087/2540

PAY TO THE ORDER OF

CBC - PAC

\$25.00

Twenty five and no/100

DOLLARS



INDEPENDENCE FEDERAL SAVINGS & LOAN ASSOCIATION OF WASHINGTON

FOR

⑆254070077⑆

0399 0097

Jeffrey Banks  
Barbara Brachville

ENCLOSED is my check for:

- ☒ \$25 ☐ \$50 ☐ \$100 ☐ \$200 ☐ \$500 ☐ \$1,000  
☐ Other: \_\_\_\_\_

Name: THE BLACK NURSES ASSOCIATION OF THE GREATER WASHINGTON AREA

Address: POST OFFICE BOX 1673

City: WASHINGTON State: DC Zip: 20011

H.R.R.F., INC.

No. 534

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Pay to the  
order of

*Twenty*

THE CHASE MANHATTAN BANK  
NATIONAL ASSOCIATION  
WORTH ST. AT CHURCH ST.  
NEW YORK, N.Y. 10013

⑆0210⑉0002⑆ 022⑉1⑉040322⑉

*5/24 1981*

Dollars

*Richard Rubin*

☐ \$25 ☐ \$50 ☐ \$100 ☐ \$200 ☐ \$500 ☐ \$1,000  
☒ Other: 20

Name: RICHARD RUBIN  
Address: OLD CORNER ROAD RD 3  
City: BEDFORD State: NY Zip: 10106

EXHIBIT D



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PM

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**AMY ROBERTSON GOLDSON**

ATTORNEY AT LAW

4015 28TH PLACE NORTHWEST

WASHINGTON, D. C. 20008

Ms. Beverly Kramer  
Federal Election Commission  
Office of the General Counsel  
1325 "K" Street, N.W.  
Suite 710  
Washington, D.C. 20463

00-4848  
RECEIVED AT THE FEC

83 SEP 23 10:52

SEP 23 10:54

1550/  
mur, 1551

September 20, 1983

Mr. Robert E. Pease  
Office of General Counsel  
1325 K Street, NW  
Suite 710  
Washington, DC 20463

Dear Mr. Pease:

Pursuant to our conversation of late, regarding The Capitol Hill Hotel and the Congressional Black Caucus Political Action Committee, I would like to state for the record, the events as they unfolded.

Sometime in early April a Mr. David Greene approached me and inquired about leasing office space for the CBC-PAC. We discussed at length the services and rates The Capitol Hill could provide. As indicated in our conversation, this is standard business practice for organizations that do not want to rent commercial space and would rather have the luxury and convenience of a hotel/office. At this time I merely regarded this as a bonafide inquiry that could prove businessworthy.

Within one week of our initial discourse, Mr. Greene contacted me and voiced his interest and intention to lease from The Capitol Hill for a period of one to two years. He did, however, state that the office would not be needed until mid-July, 1983 and he would be receiving mail prior to the start-up date. Consequently, he requested whether his mail (CBC-PAC) could be sent to The Capitol Hill until his office opened. A most reasonable and above board request.

As a courtesy, Mr. Pease, I agreed, for it is common to extend special consideration to an individual or organization that would soon be a permanent resident. In this case, within 90 days. A hotel will accept mail for a transient guest that has not arrived, but is due to arrive. I was given the impression and led to believe that Mr. Greene would be leasing a suite at The Capitol Hill. Please see attached letter.

My only intention from the beginning of this debacle, was to secure a piece of business for my organization for that is my function.

24040460312

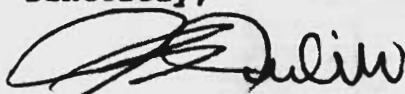
Mr. Pease  
Page Two

As for not billing or invoicing after CBC-PAC intentions were brought to light, I can only respond that I was led to believe CBC-PAC was a fictitious organization (I'm still not sure) and more importantly, this matter had become extremely irritating and I did not want this unfortunate incident to continue.

As the investigative body for the Federal Elections Commission I assure you that my sole intention was to secure a piece of business, no more, no less. I willingly submit to any further questions.

Thank you for your kind assistance in this matter.

Sincerely,



Jonathan Z. Rubin  
Regional Director of  
Sales and Marketing

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## CBC-POLITICAL ACTION COMMITTEE

Congressman William "Bill" Clay, Chairman  
Congressman Mervyn M. Dymally, Vice-Chairman  
Congressman Louis Stokes, Treasurer

April 28, 1983

### MEMBERS

Congressman William "Bill" Clay  
Congresswoman Cardiss Collins  
Congressman John Conyers  
Congressman George W. Crockett, Jr.  
Congressman Ronald V. Dellums  
Congressman Julian C. Dixon  
Congressman Mervyn M. Dymally  
Congressman Walter E. Fauntroy  
Congressman Harold E. Ford  
Congressman William H. Gray III  
Congresswoman Katie Hall  
Congressman Augustus F. Hawkins  
Congressman Mickey Leland  
Congressman Parren J. Mitchell  
Congressman Major A. Owens  
Congressman Louis Stokes  
Congressman Edolphus Towns  
Congressman Harold Washington  
Congressman Alan Wheat

David E. Greene, Executive Director

Mr. Jonathan Z. Rubin  
Director of Sales  
200 C Street, SE  
Washington, D.C. 20003

Dear Jonathan:

Pursuant to our discussions, the CBC-PAC is interested in receiving a price quote from your hotel on the cost of an executive suite for office purposes.

In the event that we do arrive at acceptable terms, occupancy would commence on or before July 15, 1983.

I look forward to talking with you again in the near future.

Sincerely,

David Greene  
Executive Director

DG/aj

Address: Suite 600, 200 C Street, S.E., Washington, D.C. 20003

We have no permanent enemies/We have no permanent friends/Only permanent interests.

340401603

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200 C Street, S.E.  
Washington, D.C. 20003

Mr. Robert E. Pease  
Office of General Counsel  
1325 K Street, NW  
Suite 710  
Washington, DC 20463



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AMY ROBERTSON GOLDSON  
ATTORNEY AT LAW

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4015 25TH PLACE NORTHWEST  
WASHINGTON, D. C. 20008  
(202) 886-7831

September 16, 1983

SEP 19 P 5: 11

Robert E. Pease, Esquire  
Federal Election Commission  
1325 K Street, N.W. - 7th Floor  
Washington, D.C. 20463

RE: MUR 1551 and 1550

Dear Mr. Pease:

In response to the questions enclosed with the Commission's letter of August 24, 1983 in the above matter, submitted herewith are the answers of the Congressional Black Caucus Political Action Committee.

The Congressional Black Caucus Political Action Committee maintains that the Congressional Black Caucus, a legislative service organization, is not a connected organization of the CBC-PAC for purposes of 2 U.S.C. §431(7).

A legislative service organization is a grouping of Members of Congress who pool resources to pursue a common legislative goal. It is operated to provide legislative services to the Members thereof in the performance of their official duties. The Congressional Black Caucus legislative service organization maintains its own offices and staff (Executive Director, Secretary, and Administrative Assistant). At no time has "the Caucus" provided the CBC-PAC with the use of its offices, staff, equipment or supplies.

The participation by the black Members of Congress in the Congressional Black Caucus legislative service organization is no different from the participation by these same members in the Democratic Study Group, another legislative service organization. The fact that all of the black Members of Congress are members of the Democratic Study Group legislative service organization, does not demonstrate that the Democratic Study Group is a connected organization of the CBC-PAC. The Congressional Black Caucus legislative service organization, by virtue of who its members are, should not be determined a connected organization of the CBC-PAC. It is not and has never been intended to be or operated as such.

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Robert E. Pease, Esquire  
September 16, 1983  
Page 2

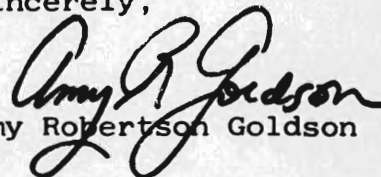
The use of the name, "Congressional Black Caucus Political Action Committee" came about as a result of an individual decision made by its organizers. In this regard, neither the approval or disapproval of the Congressional Black Caucus legislative service organization was ever sought or obtained. Ostensibly, the legislative service organization could take action to prevent the continued use of the name, Congressional Black Caucus Political Action Committee. Query: If the respondent, political committee had utilized another name such as the "Blacks in Congress Political Action Committee" (BIC-PAC), would the Commission, based upon the facts elicited in the present matter, have nevertheless determined that there is reason to believe that BIC-PAC is a connected organization of the Congressional Black Caucus? By virtue of its name, CBC-PAC should not be deemed connected to "the Caucus."

While all of the black Members of Congress financially contribute to the Congressional Black Caucus legislative service organization, only nine Members have financially contributed to the CBC-PAC. Any involvement in the CBC-PAC is purely the result of an individual decision of each Member. The Congressional Black Caucus legislative service organization has no right to control or influence the operation of CBC-PAC.

For the record and your review, please find copies of cancelled checks which represent refunds of corporate contributions which were inadvertently accepted. In addition, you will find identification of A. J. McKnight.

I trust that the attached answers will assist the Commission in bringing this matter to a favorable conclusion. However, should any additional questions arise or if we can provide further clarification on any of the issues in this matter, please feel free to contact me or Victor Sterling.

Sincerely,

  
Amy Robertson Goldson

ARG:crw

Enclosures as stated

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Before The  
FEDERAL ELECTION COMMISSION  
UNITED STATES OF AMERICA

CONGRESSIONAL BLACK CAUCUS POLITICAL  
ACTION COMMITTEE a/k/a CBC-PAC

CONGRESSMAN LOUIS STOKES

RE: MUR 1550-51

CONGRESSMAN WILLIAM L. CLAY

ANSWERS TO QUESTIONS

The Congressional Black Caucus Political Action Committee (CBC-PAC), by counsel in response to questions propounded in the above matters, answers as follows:

QUESTION No. 1 - State the total amount of administrative costs incurred by CBCPAC from date of inception through May 1983, including, but not limited to: the costs of office supplies; desks; telephone; office equipment; and rent for office space. State whether any of CBCPAC's administrative costs were paid by the Congressional Black Caucus, Inc.

ANSWER: The following administrative costs were incurred by the CBC-PAC from the date of inception through May, 1983:

| PAYEE                               | PURPOSE                                | COST                                   |
|-------------------------------------|--|--|
| U. S. Postmaster                    | P. O. Box Rental                       | \$ 22.00                               |
| Independence Federal Savings & Loan | Check Printing                         | 18.92                                  |
| Tom Skinner Associates              | Direct mailing/consulting              | 2,000.00<br>2,500.00<br>2,365.00       |
| Georgiana Anderson-Land             | Consulting fees for services           | 234.00<br>500.00<br>2,000.00<br>600.00 |
|                                     | Reimbursement for postage              | 40.00                                  |
|                                     | Reimbursement for postage/<br>printing | 231.58                                 |
|                                     | Reimbursement for parking              | 60.00                                  |

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| PAYEE                    | PURPOSE  | COST      |
|--------------------------|--|-----------|
| David R. Ramage, Inc.    | Printing - mailing cards,<br>envelopes, letterhead | 278.00    |
|                          | Printing - invitations                             | 82.00     |
| Metro Business Forms     | Letterhead cancellation fee                        | 95.00     |
|                          | Letterhead printing                                | 382.32    |
| U. S. Postmaster         | Postage stamps                                     | 120.00    |
|                          | P. O. Box rental                                   | 20.00     |
| Anise Jenkins            | Consulting fee for administrative services         | 250.00    |
| Mal Warwick & Associates | Direct mail consulting & management services       | 10,000.00 |
| U. S. Postmaster         | Postage  | 660.00    |
| Genova, Inc.             | Printing letters                                   | 500.00    |

The following administrative related costs were incurred during the period in question, although payment was not made until a date following the period in question:

| PAYEE                    | PURPOSE  | COST               |
|--------------------------|--|--------------------|
| David Greene             | Reimbursement for expenses for printing and travel | 495.64             |
| Metro Business Forms     | Payment for printing stationery                    | 2,235.50           |
| Anise Jenkins            | Financial/record keeping administrative services   | 50.00              |
| Minnie Taylor            | Clerical services rendered                         | 480.00             |
| Gladys Freeman           | Clerical services rendered                         | 400.00             |
| Regina Collins           | Clerical services rendered                         | 320.00             |
| Mal Warwick & Associates | Direct mail consulting & management services       | 256.09<br>1,952.94 |
| A. B. Dick Company       | Use of supplies, equipment, training               | 1,599.39           |
| TOTAL                    |  | \$30,748.38        |



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The CBC-PAC is managed such that elaborate office space, telephones, typewriters, dictating and duplicating equipment were not required for administrative purposes. Since its inception, the CBC-PAC has never employed a staff person for any reason. Georgiana Anderson-Land and David Greene were retained on a commission basis for the purpose of soliciting funds. Income for both was based upon the amount of money that they personally raised. By contrast, "the Caucus" legislative service organization employs a full time staff consisting of Harriet Pritchett, Executive Director; Sheila Senesie, Secretary; and Valeri Byod, Administrative Assistant. These individuals have not done any work in connection with the CBC-PAC.

As reflected in the FEC reports, the majority of the contributions received by the CBC-PAC came as a result of direct mail solicitations. The administrative costs in this regard, are reflected in the fees paid to the two direct mail firms, Mal Warwick & Associates and Tom Skinner Associates.

Clerical and bookkeeping requirements for the entire period that the CBC-PAC has been in existence have been miniscule. The number of hours of service total less than thirty (30) hours of work, which was performed by Anise Jenkins. Such services have been retained on a piece work hourly basis only and payment made for work actually performed.

The initial "seed" money utilized by the Congressional Black Caucus Political Action Committee (CBC-PAC) to fund its start up operations came from one-thousand (\$1,000.00) dollar contributions separately made by the campaign committees of Congressman William

Clay (Nov. 18, 1981), Congressman Walter E. Fauntroy (Dec. 18, 1981) and Congressman Louis Stokes (Dec. 18, 1981).

At no time did "the Caucus" provide assistance in establishing the CBC-PAC nor did it contribute any "seed" money, office supplies, equipment, or services to the CBC-PAC. While "the Caucus" maintains offices from which it operates the legislative service organization, no activities have ever been conducted from those offices, either directly or indirectly on behalf of the CBC-PAC.

The name, Congressional Black Caucus Political Action Committee (CBC-PAC) was selected by the consensus of its founders based upon the assumption that it would have mass appeal and recognition. The name is reflective of the ideological viewpoint of the CBC-PAC whose interest lies in changing the make-up of Congress to favor the cause of black and poor people.

"The Caucus" does not have the power, authority or ability to hire, appoint, discipline, discharge, remove or influence the decisions of the officers or members of the CBC-PAC.

QUESTION No. 2 - State the principal place of business and occupation of David E. Greene. State his relationship to CBCPAC. State the salary, if any, paid to Mr. Greene by CBCPAC for services rendered to CBCPAC.

ANSWER: David E. Greene's principal place of business and occupation are unknown. Mr. Greene has never been employed by "the Caucus," Congressman Stokes, Congressman Clay or any other member of the Congressional Black Caucus.

In March, 1983, Mr. Greene was retained by the CBC-PAC to serve as a consulting executive director. As an independent contractor, Mr. Greene's compensation was based on the amount of

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contributions that he personally raised. No compensation has been paid to Mr. Greene, although he was reimbursed for expenses incurred in the amount of \$495.64. As of June 9, 1983, Mr. Greene's relationship with the CBC-PAC was formally terminated. Previously, Mr. Greene had been verbally instructed to cease all formal activities with the CBC-PAC effective May 26, 1983.

**QUESTION No. 3** - State the names, addresses, and positions of all individuals who have performed services for CBCPAC attributable to administrative costs. Indicate for each individual whether he or she performed as a salaried employee, an independent contractor or a volunteer.

**ANSWER:** The individuals who have performed services for the CBC-PAC attributable to administrative costs are:

| NAME & ADDRESS  | POSITION                 | STATUS  |
|---|--------------------------|---|
| William L. Clay<br>633 Whittingham Drive<br>Silver Spring, MD 20904                 | Chairman/<br>Treasurer   | Volunteer   |
| Tom Skinner Associates<br>505 8th Avenue<br>New York, NY 10001                      | Direct mail<br>firm      | Independent contractor  |
| Georgiana Anderson-Land<br>8715 1st Avenue<br>No. 1401 D<br>Silver Spring, MD 10910 | Businesswoman            | Independent contractor  |
| Anise Jenkins<br>201 I Street, S.W.<br>No. 210<br>Washington, D.C. 20024            | Bookkeeper               | Independent contractor vis-a-vis CBC-PAC - services performed as needed on her own time, although employed by Cong. Clay during regular business hours. |
| Minnie Taylor<br>12704 Princeleigh<br>Upper Marlboro, MD 20722                      | Clerical/<br>keypunching | Independent contractor (retired)  |
| Gladys Freeman<br>1669 New Windsor Court<br>Crofton, MD 21114                       | Clerical/<br>keypunching | Independent contractor (retired)  |

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| NAME & ADDRESS   | POSITION                            | STATUS  |
|--|-------------------------------------|---|
| David Greene<br>3620 Peartree Court<br>No. 42<br>Silver Spring, MD 20904 | Consulting<br>Executive<br>Director | Independent contractor/<br>terminated                               |
| A. B. Dick Company<br>8100 Gatehouse Road<br>Falls Church, VA 22042      | Information<br>systems<br>company   | Independent contractor  |
| Regina Collins<br>1117 Kennebec Street<br>No. 4C<br>Oxon Hill, MD 20745  | Clerical/<br>keypunching            | Independent contractor<br>(Employee of National<br>Bar Association) |
| Mal Warwick & Associates<br>P. O. Box 1282<br>Berkeley, CA 94701         | Direct mail<br>firm                 | Independent contractor  |

QUESTION No. 4 - State the names, addresses and phone numbers of the founder(s) of the CBCPAC.

ANSWER: The following persons were the founders of the CBC-PAC:

Congressman William Clay, Chairman  
633 Whittingham Drive  
Silver Spring, MD 20904  
(301) 622-1051

Congressman Walter E. Fauntroy  
4105 17th Street, N.W.  
Washington, D.C. 20011  
(202) 723-5608

Congressman Louis Stokes, Treasurer  
11924 Viewcrest Terrace  
Silver Spring, MD 20902  
(301) 593-1344

Congressman Mervyn Dymally, Vice Chairman  
1245 4th Street, S.W.  
No. E-307  
Washington, D.C. 20024  
(202) 484-6017

QUESTION No. 5 - Identify all Members of Congress who have performed services for CBCPAC, including, but not limited to, the use of their names for solicitation purposes. Identify the nature of the services rendered.

ANSWER: The following Members of Congress have performed services for CBC-PAC:

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Congressman William Clay - Chairman, Treasurer - was the primary organizer of the CBC-PAC. He has been involved, on a voluntary basis, with soliciting funds, eliciting the interest of other Members of Congress and generally managing the affairs of the CBC-PAC.

Congressman Louis Stokes - Treasurer

Congressman Walter E. Fauntroy - Treasurer

Congresswoman Cardiss Collins - Treasurer

Congressman Mervyn Dymally - Vice Chairman, Secretary

The foregoing persons have voluntarily assisted Congressman Clay from time to time in an advisory capacity on matters relating to the operation of the CBC-PAC, fundraising and planning.

Contributions have been made to the CBC-PAC by the authorized committees of the following Members of Congress:

Julian C. Dixon Democrat for Congress (\$1,000 loan);

Crockett for Congress Committee (\$1,000 loan);

Bill Gray for Congress Committee (\$1,000);

Dymally for Congress (\$1,000);

Leland for Congress (\$1,000);

Parren Mitchell Campaign for Congress (\$1,000).

Since the inception of the CBC-PAC, there have been twenty-two black Members of Congress and members of the Congressional Black Caucus legislative service organization. Of these twenty-two black members, the authorized political committees of nine members have made either loans or outright contributions to the CBC-PAC.

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The stationery utilized by the CBC-PAC for general correspondence and solicitation purposes, has contained the names of the following Members of Congress:

Congressman William "Bill" Clay, Chairman  
Congressman Mervyn M. Dymally, Vice Chairman  
Congressman Louis Stokes, Treasurer  
Congresswoman Cardiss Collins  
Congressman John Conyers, Jr.  
Congressman George W. Crockett, Jr.  
Congressman Ronald V. Dellums\*  
Congressman Julian C. Dixon  
Congressman Walter E. Fauntroy  
Congressman Harold E. Ford\*  
Congressman William H. Gray, III  
Congresswoman Katie Hall  
Congressman Augustus F. Hawkins\*  
Congressman Mickey Leland  
Congressman Parren Mitchell  
Congressman Major R. Owens  
Congressman Charles B. Rangel  
Congressman Edolphus Towns  
Congressman Harold Washington (former member)  
Congressman Alan Wheat

\* Did not authorize the use of his name by CBC-PAC for any purpose, including solicitation. The member was unaware that the CBC-PAC letterhead contained his name and has requested that it not be used in the future.



Troyer Bond

Those Members of Congress who have permitted the use of their names by the CBC-PAC, support the endeavors of the CBC-PAC. In their individual capacities, it is anticipated that from time to time, such members will act on a voluntary basis as advisors to identify external resources and otherwise assist in the formulation of policy, and in the implementation of fundraising programs and other activities for the CBC-PAC.

QUESTION No. 6 - State the time period that the Capitol Hill Hotel was used as a mail drop for CBCPAC. State the cost for the use of the Capitol Hill Hotel as a mail drop for the April 14, 1983 solicitation and for all other solicitations. Please state the approximate number of pieces of mail that were delivered to Suite 600, 200 C Street, S.E., Washington, D.C. 20003, addressed to CBCPAC. State whether the Congressional Black Caucus, Inc., ever used Suite 600, 200 C Street, S.E., Washington, D.C. 20003, for receipt of mail.

ANSWER: The Capitol Hill Hotel was used as a mail drop for approximately two weeks during the period April 14, 1983 - April 30, 1983. One letter of solicitation dated April 14, 1983 was mailed. To the best of respondent's knowledge, no pieces of mail were delivered to 200 C Street, S.E., Washington, D.C. 20003. The Congressional Black Caucus, Inc., which maintains its own offices has never used Suite 600, 200 C Street, S.E., Washington, D.C. 20003 for receipt of mail.

No costs were incurred for the use of Suite 600, 200 C Street, S.E. as a mail drop for the CBC-PAC. The use of that address was the result of the unauthorized actions of David Greene who attempted to negotiate office space at the hotel. In fact, when the April 14, 1983 letter of solicitation was first seen by Congressman Clay, Mr. Greene was specifically advised that the CBC-PAC had a post office address for the receipt of mail.

Subsequently, Congressman Clay sent a change of address card to the U. S. Post Office in order that all mail would be received directly at the CBC-PAC post office box.

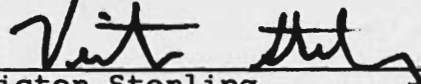
Congressman Clay also advised Mr. Greene that the contents of the April 14, 1983 letter must be reviewed prior to mailing. After reviewing the proposed letter of April 14, 1983, Congressman Stokes raised certain questions. A meeting was then arranged between Congressmen Stokes, Clay and Fauntroy to discuss and resolve certain concerns. Following this meeting, David Greene was then contacted by Congressman Clay relative to certain recommended changes to the letter. However, Mr. Greene stated that it was too late and that the letter had been mailed.

Respectfully submitted,

Congressional Black Caucus  
Political Action Committee

By:

  
Amy Robertson Goldson

  
Victor Sterling

4015 28th Place, N.W.  
Washington, D.C. 20008

Attorneys For Respondents

CONGRESSIONAL BLACK CAUCUS POLITICAL  
ACTION COMMITTEE CBC - PAC

P.O. BOX 2006  
WASHINGTON, D.C. 20013

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15-7087/2548

May 18 1983

PAY  
TO THE  
ORDER OF

Banner + 02-02-41-004/05/0500 105102548

\$ 25.02

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DOLLARS

**FSL** INDEPENDENCE FEDERAL SAVINGS  
& LOAN ASSOCIATION  
OF WASHINGTON

FOR

Refund - Inc.

William L. Liley  
May 18 1983

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7-16

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**MARYLAND NATIONAL BANK**  
 BALTIMORE, MD.  
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 THE FIRST NATIONAL BANK  
 WASHINGTON, D.C.

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CONGRESSIONAL BLACK CAUCUS POLITICAL  
ACTION COMMITTEE CBC - PAC  
P.O. BOX 2006  
WASHINGTON, D.C. 20013

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PAY  
TO THE  
ORDER OF

New Shiloh Baptist Church

May 18 19 83

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DOLLARS

FSL

INDEPENDENCE FEDERAL SAVINGS  
& LOAN ASSOCIATION  
OF WASHINGTON

FOR

Refund

William L. Lee

Wm. L. Lee

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DR. HAROLD A. CARTER  
 NEW SHILOH BAPTIST CHURCH  
 Fremont Avenue and Lanvale Street  
 Baltimore, Maryland 21217

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 WASHINGTON, D.C.

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 PAY ANY BANK  
 MARYLAND NATIONAL BANK  
 BALTIMORE, MD.  
 052000103

7-16



CONGRESSIONAL BLACK CAUCUS POLITICAL  
ACTION COMMITTEE CBC - PAC

P.O. BOX 2006  
WASHINGTON, D.C. 20013

1046

12-7001/2540

PAY  
TO THE  
ORDER OF

Black Affairs Center, Inc. 0572 205854350  
One Hundred

\$ 100 00

DOLLARS



INDEPENDENCE FEDERAL SAVINGS  
& LOAN ASSOCIATION  
OF WASHINGTON

For

Refund - Inc.

William L. Clay  
James L. Clay

NUCCO 81

#001046# 1:254070077:

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#0000010000#

Deposit only  
066 6122

7-27 PAY ANY BANK P.E.G. 7-27  
F.R.B. BALTIMORE MD 05200278  
05-11-87 02486.0577 205654140  
DIVISION OF INVESTIGATION  
U.S. DEPT. OF JUSTICE  
WASHINGTON, D.C.  
MAY 31 1987  
PROCESSED  
THE NIDIS NATL BANK  
WASHINGTON, D.C.

FOR DEPOSIT ONLY

1230940408

CONGRESSIONAL BLACK CAUCUS POLITICAL  
ACTION COMMITTEE CBC - PAC

P.O. BOX 2006

WASHINGTON, D.C. 20013

1049

10-1007/2540

08-08-83 004 08 0550

29 May 1983

PAY  
TO THE  
ORDER OF

H. R. R. F INC

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DOLLARS

**FSL** INDEPENDENCE FEDERAL SAVINGS  
& LOAN ASSOCIATION  
OF WASHINGTON

FOR

Refund - Inc

William Kelley

Inc. Super

#001049#

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HR Foundation Inc.

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1-2 CHASE 060385302421016605826-01 205595289  
F.R.B. BALTIMORE MD 052000278  
PAY TO THE ORDER OF THE FEDERAL RESERVE BANK OF BALTIMORE

1-2  
PAY ANY BANK, P.E.G.  
CHASE MANHATTAN  
NEW YORK, NEW YORK  
1-2 59 M.L.

JE '83' 06

PROCESSED  
29 THE FEDERAL RESERVE BANK OF WASHINGTON

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**AMY ROBERTSON GOLDSON**

ATTORNEY AT LAW

4015 28TH PLACE NORTHWEST

WASHINGTON, D. C. 20008

Robert E. Pease, Esquire  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Congressional Black Caucus  
Political Action Committee  
P.O. Box 2006  
Washington, D.C. 20024

May 16, 1983

Mr. A. J. McKnight  
PO Box 3005  
Lafayette, Louisiana 70501

Dear Mr. McKnight:

The Congressional Black Caucus Political Action Committee's financial report on contributions is being reviewed by the Federal Election Commission.

I would appreciate it if you will fill out the information on the bottom of this letter and return it in the self-addressed stamped envelope enclosed.

Respectfully,

*Whe*

William L. Clay, M.C.  
Chairman, CBC-PAC

To Whom it May Concern:

Please find below the information requested.

NAME

*A. J. McKnight*

Occupation

*Catholic Priest*

Employer

*Diocese of Lafayette*

&

*788 N. Union St.*

address

*Opelousas La. 70501*

*318-292-9206*

*1 5/23/83*

*A. J. McKnight*

Phone (if you wish)

Date

signature





# Congressional Black Caucus

H2-344 House Annex #2

Washington, D.C. 20515

202 — 226-7790

RECEIVED AT THE FEC

83 SEP 20 P 1: 25

1550/  
MUR 1551

Julien C. Dixon, Calif., Chairman  
Mickey Leland, Tex., 1st Vice-Chairman  
William H. Gray, III, Pa., 2nd Vice-Chairman  
Edolphus Towns, N.Y., Secretary  
Harold Washington, Ill., Treasurer

Augustus F. Hawkins, Calif.  
John Conyers, Jr., Mich.  
William L. Clay, Mo.  
Louis Stokes, Ohio  
Ronald V. Dellums, Calif.  
Walter E. Fauntroy, D.C.  
Parren J. Mitchell, Md.  
Charles B. Rangel, N.Y.  
Cardiss Collins, Ill.  
Harold E. Ford, Tenn.  
George W. Crockett, Jr., Mich.  
Mervyn M. Dymally, Calif.  
Gus Savage, Ill.  
Katie Hall, Ind.  
Major R. Owens, N.Y.  
Alan Wheat, Mo.

September 16, 1983

Mr. Robert Pease  
Office of the General Counsel  
Federal Election Commission  
Washington, D.C. 20463

Dear Mr. Pease:

This is in response to your letter of August 24, 1983 wherein the Commission has determined that there is reason to believe that the Congressional Black Caucus Political Action Committee (CBC-PAC) failed to report the name, address and relationship of its connected organization, the Congressional Black Caucus.

The Congressional Black Caucus legislative service organization incorporates by reference its previous response and maintains that it is not connected with the CBC-PAC. The Congressional Black Caucus, as a collective body, never organized or established the CBC-PAC. The Caucus maintains its own offices at: H2-344, House Annex II, U.S. House of Representatives, Washington, D.C. It has three (3) full time employees, Harriet Pritchett, Valerie Byrd, and Sheila Senessie. The Congressional Black Caucus has at no time provided the CBC-PAC with administrative support, office space, supplies, equipment, or in-kind services.

For your information, in January, 1982, the Congressional Black Caucus legislative service organization donated two certificates of deposit (approximate value \$82,155.00 at maturity) to the Congressional Black Caucus Foundation, Inc., a non-profit charitable organization. On the other hand, the Congressional Black Caucus has never provided seed money or financial support to the CBC-PAC. Had the Congressional Black Caucus ever intended to establish a separate segregated fund, arguably, it would appear that it would have paid the costs of establishing, administering, and soliciting contributions for the Congressional Black Caucus Political Action Committee.

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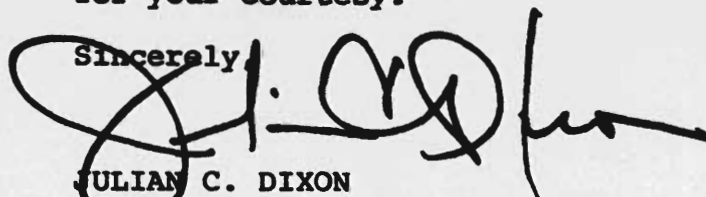
Mr. Robert Pease  
Page Two  
September 16, 1983

The Congressional Black Caucus legislative service organization neither sets policy nor initiatives for the CBC-PAC, nor does it control or involve itself in the operation or functions of the CBC-PAC. The Congressional Black Caucus legislative service organization does not assist the CBC-PAC in fundraising, does not require or request that its members contribute to the CBC-PAC, and does not make suggestions or recommendations regarding those candidates to whom the CBC-PAC will contribute.

While many of the Black members of Congress are involved in the Congressional Black Caucus Political Action Committee's endeavors, their participation is an individual decision and unrelated to their involvement with the legislative service organization.

I hope that the foregoing clarifies any concerns that the Commission might have. Should you have any further inquiries, please do not hesitate to so advise. Thank you in advance for your courtesy.

Sincerely,



JULIAN C. DIXON  
Chairman  
Congressional Black Caucus

JCD:tss

9330640408

**Congressional Black Caucus**

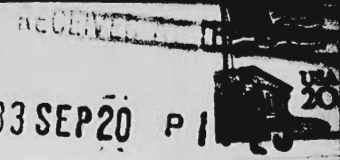
212-344 House Annex #2

Washington, D.C. 20515

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Mr. Robert Pease  
Office of the General Counsel  
Federal Election Commission  
Washington, D.C. 20463

83 SEP 20 P 1





**Congressional Black Caucus**

32-344 House Annex #2

Washington, D.C. 20515

202 — 226-7780

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83 AUG 30 PM 2: 03

Julian C. Dixon, Calif., Chairman  
Mickey Leland, Tx., 1st Vice-Chairman  
William H. Gray, III, Pa., 2nd Vice-Chairman  
Edolphus Towns, N.Y., Secretary  
Cardiss Collins, Ill., Treasurer

Augustus F. Hawkins, Calif.  
John Conyers, Jr., Mich.  
William L. Clay, Mo.  
Louie Stokes, Ohio  
Ronald V. Dellums, Calif.  
Walter E. Fauntroy, D.C.  
Parren J. Mitchell, Md.  
Charles B. Rangel, N.Y.  
Harold E. Ford, Tenn.  
George W. Crockett, Jr., Mich.  
Mervyn M. Dymally, Calif.  
Gus Savage, Ill.  
Katie Hall, Ind.  
Major R. Owens, N.Y.  
Alan Wheat, Mo.

August 29, 1983

Mr. Robert Pease  
Office of the General Counsel  
Federal Election Commission  
Washington, D.C. 20463

RE: MURs 1550 and 1551

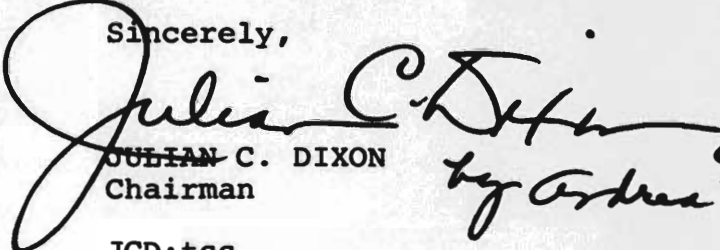
Dear Mr. Pease:

This will acknowledge receipt of the Commission's letter dated August 24, 1983 which was received in the Congressional Black Caucus (CBC) office on August 25, 1983.

Due to the Congressional recess, I will be out of town until September 12, 1983. I am therefore respectfully requesting that I be given until September 22, 1983 to respond to the Commission's correspondence.

Thank you in advance for your kind attention to this request. Awaiting your response, I remain

Sincerely,

  
JULIAN C. DIXON  
Chairman

JCD:tss

*by Andrea Gray*

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gressional Black Caucus

HA-444 House Annex #2

Washington, D.C. 20515



Mr. Robert Pease  
Office of the General Counsel  
Federal Election Commission  
Washington, D.C. 20463

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AMY ROBERTSON GOLDSON  
ATTORNEY AT LAW

RECEIVED AT THE FEC  
644 723  
83 AUG 29 AM 11:00

4015 25TH PLACE NORTHWEST  
WASHINGTON, D. C. 20008  
(202) 898-7831

August 26, 1983

83 AUG 29 P 3:20

GENERAL COUNCIL

Robert E. Pease, Esquire  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

RE: MUR 1550 & 1551

Dear Mr. Pease:

In connection with the interrogatories received today in the above captioned matters, we respectfully request an extension of time up to September 19, 1983 in which to submit answers to the interrogatories.

As I mentioned to you in our telephone conversation, I am scheduled to leave this area for vacation tomorrow and will not return until September 8, 1983. Accordingly, your anticipated cooperation in granting this request is appreciated.

Sincerely,



Amy Robertson Goldson

ARG:crw

84040460343



Y ROBERTSON GOLDSON

ATTORNEY AT LAW

4015 26TH PLACE NORTHWEST

WASHINGTON, D. C. 20008



83 AUG 29

RECEIVED

1983

Robert E. Pease, Esquire  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

840401605

AMY ROBERTSON GOLDSON  
ATTORNEY AT LAW

4018 26th PLACE NORTHWEST  
WASHINGTON, D. C. 20008  
(202) 898-7921

August 23, 1983

RECEIVED AT THE FEC  
Cec # 7114  
83 AUG 25 P 2: 04

13 AUG 25 P 3: 58

GENERAL COUNSEL

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

RE: MUR 1550 & 1551

Dear Mr. Anderson:

This is to confirm our telephone conversation of today regarding MUR 1550 and MUR 1551, copies of which have been forwarded to The Honorable Walter E. Fauntroy, the current treasurer of the CBC-PAC.

As we discussed, at this time, Congressman Fauntroy has no further information beyond that which has been submitted thus far. However, in the event that the Commission has any further questions or desires clarification of any of the information previously supplied, please do not hesitate to so advise me.

Sincerely,

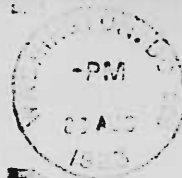
  
Amy Robertson Goldson

ARG:crw

cc: The Honorable Walter E. Fauntroy

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LAW OFFICES  
**ROBERTSON GOLDSON**  
015 28TH PLACE, NORTHWEST  
WASHINGTON, D. C. 20008



83 AUG 25

P

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



84040160





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

August 24, 1983

Capitol Hill Hotel  
200 C Street, S.E.  
Washington, D.C. 20003

Re: MURs 1550 and 1551

Dear Sir/Madam:

On May 11, 1983, the Commission notified you of a complaint alleging that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended 2 U.S.C. § 431 et seq. (the "Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the the complaint, the Commission on August 22, 1983, determined that there is reason to believe that you have violated 2 U.S.C. § 441b(a), a provision of the Act. Specifically it appears that you made an in-kind contribution to the Congressional Black Caucus Political Action Committee in permitting the Committee to use the hotel as a mail drop.

As of this date, we have received no response from you in connection with this matter. The Office of General Counsel would like to settle this matter through conciliation prior to finding probable cause. However, in the absence of any information which demonstrates that no further action should be taken against you, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

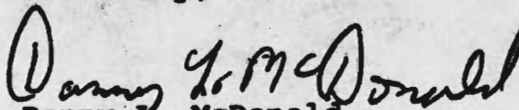
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Capitol Hill Hotel  
Page 2

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

If you have any questions, contact Robert E. Pease at (202) 523-4529.

Sincerely,

  
Danny E. McDonald,  
Chairman

Enclosure  
Procedures

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 24, 1983

Amy Robertson Goldson  
Victor Sterling  
4015 28th Place, N.W.  
Washington, D.C. 20008

Re: MURs 1550 and 1551

Dear Ms. Goldson and Mr. Sterling:

The Federal Election Commission notified you on May 11, 1983, of two complaints which alleged that your clients, the Congressional Black Caucus Political Action Committee, ("CBCPAC") Congressman Louis Stokes and Congressman William L. Clay, violated certain provisions of the Federal Election Campaign Act of 1971, as amended (the "Act"). Copies of the complaints were forwarded to your clients at that time. We acknowledge receipt of your explanation of these matters dated May 26, 1983, and June 8, 1983.

Upon further review of the allegations contained in the complaint and information supplied by you, the Commission, on August 22, 1983, determined the following:

(1) that there is reason to believe that CBCPAC and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 433(b)(2) by failing to report the name, address, relationship and type of its connected organization, the Congressional Black Caucus;

(2) that there is reason to believe that the Congressional Black Caucus Political Action Committee and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 441b(b)(4) by soliciting contributions outside of the membership class of the Congressional Black Caucus;

(3) that there is reason to believe that CBCPAC and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 441b(a) by accepting corporate contributions;

(4) that there is reason to believe that CBCPAC and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 441d by failing to include a disclaimer stating the name of the person paying for the costs of a solicitation dated April 14, 1983;

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Amy Goldson and Victor Sterling  
Page 2

(5) that there is reason to believe that CBCPAC and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 433(a) by failing to file a timely Statement of Organization, but take no further action at this time;

(6) that there is reason to believe that CBCPAC and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 433(c) by failing to file a timely amendment to their Statement of Organization reflecting a change in treasurers; and

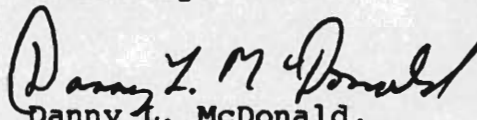
(7) that there is reason to believe that CBCPAC and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 432(g)(4) by failing to file reports with the Commission.

Your response to the Commission's initial notification of this complaint did not provide complete information regarding the matters in question. Please submit answers to the enclosed questions within ten (10) days of receipt of this letter. Statements should be submitted under oath.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause; however, in the absence of any information which demonstrates that no further action should be taken against CBCPAC and treasurers Congressman Clay and Congressman Stokes, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you have any questions, please contact Robert E. Pease, the attorney assigned to this matter at (202) 523-4529.

Sincerely,

  
Danny L. McDonald,  
Chairman

Enclosure  
Procedures

84040460350



BEFORE THE FEDERAL ELECTION COMMISSION

REQUEST TO ANSWER QUESTIONS

TO: Amy Robertson Goldson and Victor Sterling  
4015 28th Place N.W.  
Washington, D.C. 20008

Re: MUR 1550-51

The Federal Election Commission (the "Commission") requests that the Congressional Black Caucus Political Action Committee ("CBCPAC") answer the questions that are listed below.

1. State the total amount of administrative costs incurred by CBCPAC from date of inception through May 1983, including, but not limited to: the costs of office supplies; desks; telephone; office equipment; and rent for office space. State whether any of CBCPAC's administrative costs were paid by the Congressional Black Caucus, Inc.
2. State the principal place of business and occupation of David E. Greene. State his relationship to CBCPAC? State the salary, if any, paid to Mr. Greene by CBCPAC for services rendered to CBCPAC.
3. State the names, addresses, and positions of all individuals who have performed services for CBCPAC attributable to administrative costs. Indicate for each individual whether he or she performed as as salaried employee, an independent contractor or a volunteer.

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4. State the names, addresses and phone numbers of the founder(s) of CBCPAC.
5. Identify all Members of Congress who have performed services for CBCPAC, including, but not limited to, the use of their names for solicitation purposes. Identify the nature of the services rendered.
6. State the time period that the Capitol Hill Hotel was used as a mail drop for CBCPAC. State the cost for the use of the Capitol Hill Hotel as a mail drop for the April 14, 1983 solicitation and for all other solicitations. Please state the approximate number of pieces of mail that were delivered to Suite 600, 200 C Street, S.E., Washington, D.C. 20003, addressed to CBCPAC. State whether the Congressional Black Caucus, Inc., ever used Suite 600, 200 C Street, S.E., Washington, D.C. 20003, for receipt of mail.

Please submit to the Commission responses to these questions along with any other information that the Congressional Black Caucus Political Action Committee may wish to provide within ten (10) days of your receipt of this letter.

84040460352



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

**August 24, 1983**

Honorable Julian C. Dixon  
Congressional Black Caucus  
H2-344 House Annex #2  
Washington, D.C. 20515

**Re: MURs 1550 and 1551**

**Dear Congressman Dixon:**

On May 11, 1983, the Commission notified you of a complaint alleging that Congressional Black Caucus may have violated certain sections of the Federal Election Campaign Act of 1971, as amended. We acknowledge receipt of your explanation of these matters on May 26, 1983.

Upon further review of the allegations contained in the complaint and information provided by you, the Commission, on August 22, 1983, determined that there is reason to believe that the Congressional Black Caucus Political Action Committee violated 2 U.S.C. § 433(b)(2) by failing to report the name, address and relationship of its connected organization, the Congressional Black Caucus.

You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Please submit any such response within ten (10) days of your receipt of this notification.

The Office of General Counsel would like to settle this matter through conciliation prior to finding probable cause, however, in the absence of any information which demonstrates that no further action should be taken against the Congressional Black Caucus Political Action Committee, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

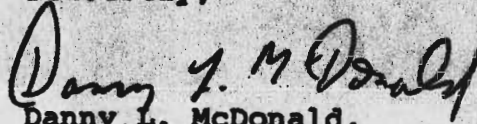
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Honorable Julian C. Dixon  
Page 2

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you have any questions, please contact Robert E. Pease, the attorney assigned to this matter, at (202) 523-4529.

Sincerely,

  
Danny L. McDonald,  
Chairman

Enclosure  
Procedures

84040460354



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Congressional Black Caucus ) MUR 1550, 1551 and  
Congressional Black Caucus ) Pre-MUR 107  
Political Action Committee )  
Congressman Louis Stokes )  
Congressman William L. Clay )  
Capitol Hill Hotel )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 22, 1983, the Commission decided by a vote of 5-0 to take the following actions in MURs 1550, 1551 and Pre-MUR 107:

1. Merge MURs 1550, 1551 and Pre-MUR 107.
2. Find reason to believe that the Congressional Black Caucus is the connected organization of the Congressional Black Caucus Political Action Committee for purposes of 2 U.S.C. § 431(7).
3. Find reason to believe that the Congressional Black Caucus Political Action Committee and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 433(b)(2) by failing to report the name, address, relationship and type of its connected organization, the Congressional Black Caucus.
4. Find no reason to believe that any authorized committee contributing to the Congressional Black Caucus Political Committee is affiliated with the Congressional Black Caucus Political Action Committee for purposes of 11 C.F.R. § 100.5(g) of the Commission Regulations.
5. Find reason to believe that the Congressional Black Caucus Political Action Committee and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 441b(b)(4) by soliciting contributions outside of the membership class of the Congressional Black Caucus.

(Continued)

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6. Find reason to believe that the Congressional Black Caucus Political Action Committee and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 441b(a) by accepting corporate contributions.
7. Find reason to believe that the Capitol Hill Hotel violated 2 U.S.C. § 441b(a) by making an in-kind contribution to the Congressional Black Caucus Political Action Committee in permitting the Committee to use the hotel as a mail drop.
8. Find reason to believe that the Congressional Black Caucus Political Action Committee and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 441d by failing to include the required disclaimer stating the name of the person paying for the costs of a solicitation dated April 14, 1983.
9. Find reason to believe that the Congressional Black Caucus Political Action Committee and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 433(a) by failing to file a timely Statement of Organization, but take no further action.
10. Find no reason to believe that the Congressional Black Caucus Political Action Committee or treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 433(c) by failing to report a change of address.
11. Find reason to believe that the Congressional Black Caucus Political Action Committee and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 433(c) by failing to file a timely amendment to their Statement of Organization reflecting a change in treasurers.
12. Find reason to believe that the Congressional Black Caucus Political Action Committee and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 432(g)(4) by failing to file reports with the Commission.

(Continued)

84040460356

13. Find no reason to believe that the Congressional Black Caucus Political Action Committee or treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 434(b)(3)(A) by failing to report the employer and occupation of contributor A.J. McKnight.
14. Take no jurisdiction with respect to the alleged failure of the Congressional Black Caucus Political Action Committee to pay federal and state withholding taxes for Georgiana Anderson-Land.
15. Take no jurisdiction with respect to the issue of whether Congressman Clay's House Offices were used for Congressional Black Caucus Political Action Committee operations.
16. Find no reason to believe that the Congressional Black Caucus Political Action Committee or treasurers Congressman Clay or Congressman Stokes violated 2 U.S.C. § 434(b)(3)(A) by failing to report the sources of certain contributions from individuals.
17. Approve the letters as attached to the General Counsel's Report signed August 17, 1983.

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

Attest:

8-23-83

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

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

8-18-83, 11:28  
8-18-83, 4:00

84040460357



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary  
FROM: Office of General Counsel *Cit.*  
DATE: August 18, 1983  
SUBJECT: MUR 1550-51 - General Counsel's Report

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

Open Session \_\_\_\_\_

Closed Session \_\_\_\_\_

CIRCULATIONS

48 Hour Tally Vote [X]  
Sensitive [X]  
Non-Sensitive [ ]

24 Hour No Objection [ ]  
Sensitive [ ]  
Non-Sensitive [ ]

Information [ ]  
Sensitive [ ]  
Non-Sensitive [ ]

Other [ ]

DISTRIBUTION

Compliance [X]  
Audit Matters [ ]

Litigation [ ]  
Closed MUR Letters [ ]

Status Sheets [ ]  
Advisory Opinions [ ]

Other (see distribution below) [ ]

84040160358



**SENSITIVE**

**BEFORE THE FEDERAL ELECTION COMMISSION**

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

In the Matter of )

83 AUG 18 AM: 28

Congressional Black Caucus )

Congressional Black Caucus )

Political Action Committee )

MUR 1550, 1551

Congressman Louis Stokes )

and Pre-MUR 107

Congressman William L. Clay )

Capitol Hill Hotel )

**GENERAL COUNSEL'S REPORT**

**GENERATION OF MATTER**

On May 6, 1983, two complaints were filed against the Congressional Black Caucus (the "Caucus"), the Congressional Black Caucus Political Action Committee ("CBCPAC"), Congressman Louis Stokes, Congressman William L. Clay, and the Capitol Hill Hotel. One complaint was filed by Robert C. Heckman of the Fund for a Conservative Majority ("FCM") and the other by Paul D. Kamenar of the Washington Legal Foundation ("WLF"). In addition, the Commission received a referral from the Department of Justice on June 15, 1983, concerning a complaint submitted to the Department by Louis W. Barnett of Citizens for the Republic alleging, inter alia, violations of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431 et seq. (the "Act" or "FECA"). (Attachment I).1/

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1/ In the interest of clarity and economy, the Office of General Counsel is recommending that MUR's 1550, 1551 and Pre MUR 107 be merged. The allegations in each are, for all intents and purposes, identical, and merging the matters will allow discussion of all issues completely without unnecessary repetition.

### SUMMARY OF ALLEGATIONS

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The complaints make substantially identical allegations although WLF's complaint is somewhat more detailed in its presentation than that of FCM. The allegations lodged against CBCPAC fall into three principal categories of violations: 1) deficient reporting of statutorily required information, 2 U.S.C. §§ 432, 433 and 434; 2) acceptance of illegal corporate and union contributions and solicitation outside the membership class, 2 U.S.C. §§ 441b(a) and 441b(b)(4); and 3) failure to include written disclaimers on solicitation materials, 2 U.S.C. § 441d. (The Department of Justice referral is limited to the § 441d allegation). In addition, complainant WLF alleges that the failure to use the proper disclaimer on the solicitation complained of was a knowing and willful violation within the meaning of 2 U.S.C. § 437g(a)(5)(B), and that respondent Capitol Hill Hotel made illegal in-kind contributions to CBCPAC in violation of 2 U.S.C. § 441b(a). Responses were received by the Commission from CBCPAC and the Caucus on May 26, 1983. (Respectively Attachments II and III). Following receipt of the responses, attorneys for CBCPAC requested a meeting to discuss this matter. That meeting was held in the Commission's offices on June 6, 1983.

### FACTUAL AND LEGAL ANALYSIS

#### Relationship Between the CAUCUS and CBCPAC

2 U.S.C. § 431(7) of the Act defines connected organization as one that is not itself a political committee, but that "directly or indirectly establishes, administers, or financially

supports a political committee." One of the allegations made in the complaints is that the Caucus is the connected organization of CBCPAC. It is alleged that CBCPAC was formed and is administered and financed by the Caucus, thus meeting the terms of the definition for a connected organization set forth in § 431(7). In support of this allegation, complainants rely upon the following: that all of the members of the CBCPAC are also members of the Caucus; that several members of Congress belonging to the Caucus, or their authorized committees, made major contributions to CBCPAC; that CBCPAC's name includes the name of the Caucus; that CBCPAC is operated from the House Office of Congressman William Clay; and that CBCPAC raised almost \$33,000 during 1982, but disclosed no significant expenditures for administrative or overhead costs. Furthermore, complainants state that CBCPAC's year-end report for 1982 shows a \$250 payment from CBCPAC to Anise Jenkins for bookkeeping and accounting services. Her address is reported as 2470 Rayburn House Office Building, the address of Congressman Clay's congressional office. Finally, complainants state that the address reported by CBCPAC, Suite 600, 200 C Street, SE, Washington D.C., is nonexistent. Based upon the above, complainants conclude that CBCPAC has been established, administered and financed by the Caucus and legislative personnel employed by Congressman Clay.

The complainants also allege that the Congressional Black Caucus Foundation, Inc., may be affiliated with CBCPAC for purposes of 11 C.F.R. § 100.5(g), but do not substantiate their claim beyond the inference that arises from the name of the

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foundation. In the same vein, complainants suggest that certain of the members of the Caucus whose authorized committees contributed to CBCPAC may be affiliated to CBCPAC. See 11 C.F.R. § 100.5(g).

That the name of CBCPAC includes that of the Caucus does not in and of itself require the conclusion that CBCPAC was established by the Caucus. The name Congressional Black Caucus is not a trademark of the legislative service organization. Presumably the name can be used by anyone, but use of the Caucus' name by CBCPAC does raise a question of association between the Caucus and CBCPAC that has yet to be satisfactorily answered. The issue, however, is whether CBCPAC was established, administered or financed by the Caucus. Respondents deny the allegation that the Caucus, acting as an organization, established CBCPAC. (Attachment II at page 6 and Attachment III), but complainants point to the fact that several black members of Congress (all members of the Caucus) or their authorized committees made substantial contributions to CBCPAC. Complainants argue that such contributions constituted start-up monies for CBCPAC and are evidence supporting the theory that CBCPAC is financed by the Caucus for purposes of 2 U.S.C. § 431(7). However, respondents deny that the Caucus provided any of the initial funds required to establish CBCPAC or to furnish staff, office space or other administrative support for CBCPAC. (Attachment II at page 5). Specifically, Congressman Clay denies that his congressional offices were used to provide services to CBCPAC. (Id. at page 10). Respondents maintain that CBCPAC

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operates without its own individual offices, equipment or staff. (Id. at page 11). CBCPAC states that required services are contracted out and that all secretarial work for the time period in question was performed by Anise Jenkins and Georgiana Anderson-Land in their homes during off duty hours. 2/ (Id. at pages 8 and 9). Nevertheless, there is sufficient evidence available to the Office of General Counsel at the present time upon which to base a recommendation that there is reason to believe that the Caucus established, administered or financed CBCPAC. Respondents deny that CBCPAC was established by the Caucus, but further inquiry is necessary to determine whether the denial can be substantiated. Therefore, the Office of General Counsel recommends that the Commission find reason to believe that the Congressional Black Caucus is the connected organization of the Congressional Black Caucus Political Action Committee for purposes of 2 U.S.C. § 431(7).

Complainants also question whether by making substantial contributions to CBCPAC, authorized committees of certain black members of Congress may have become affiliated with CBCPAC for purposes of Commission Regulation 11 C.F.R. § 100.5(g).

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2/ Complainants offer as further evidence that CBCPAC was operated out of Congressman Clay's office the fact that fees for use of the post office reported by CBCPAC as its mailing address were not indicated on any Commission reports. Respondents admit that the Committee failed to report the fee for the post office box, but maintain that the failure was inadvertent. An amended report has been filed showing payment of \$22.00 for the post office box fee.

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Respondents, admit that the authorized committees of several black members of Congress made contributions (or loans) of \$1,000 to CBCPAC, but deny that this fact evidences affiliation. (Attachment II at pages 8 and 9).

There is no evidence that CBCPAC was established by the same person or persons who established any of the authorized committees of the contributing black members of Congress. While each black congressman or congresswoman can be said to have established his or her own authorized committee, these committees cannot be said to have been established by the other black members of Congress who formed the CBCPAC. There is no evidence that the same individuals who established the authorized committees also established CBCPAC. 11 C.F.R. § 100.5(g)(i)(E). There are no formal organizational documents evidencing CBCPAC's authority over any of the authorized committees of the contributing black members of Congress or vice versa. Furthermore, respondents deny that such authority exists. (Attachment II at page 8 and Attachment III). 11 C.F.R. § 100.5(g)(ii)(B). There has been no transfer of a substantial portion of funds from any authorized committees to CBCPAC.<sup>3/</sup>

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<sup>3/</sup> The total transferred by the authorized committees of black members of Congress was \$9,000. Each of nine authorized committees contributed \$1,000 to CBCPAC. Considering that the total contributions received by CBCPAC to date is nearly \$33,000, a \$1,000 contribution cannot be said to be a substantial portion of CBCPAC's total for purposes of 11 C.F.R. § 100.5(g)(ii)(E). Similarly, a one thousand dollar contribution cannot be considered to be a substantial portion of the transferor authorized committees either. Id.

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Respondents deny, and no evidence has been offered, that CBCPAC and any of the authorized committees in question have made contributions in a similar pattern. (Attachment II at page 5 and Attachment III). 11 C.F.R. § 100.5(g)(ii)(D). Thus the allegation that the authorized committees of those black members of Congress that contributed to CBCPAC are affiliated with CBCPAC is without basis in fact. Therefore, the Office of General Counsel recommends that the Commission find no reason to believe that any authorized committee contributing to the Congressional Black Caucus Political Action Committee is affiliated with the latter for purposes of 11 C.F.R. § 100.5(g) of the Commission Regulations.

Since it does not appear that any authorized committees are affiliated with CBCPAC, CBCPAC appears to be in violation of the reporting requirements of 2 U.S.C. § 433(b)(2) only with respect to the committee's failure to report the existence of the Caucus as a connected organization. Therefore, the Office of General Counsel recommends that the Commission find reason to believe that the Congressional Black Caucus Political Action Committee and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 433(b)(2) by failing to report the name, address and relationship of its connected organization, the Congressional Black Caucus.

Complainants have also alleged that CBCPAC is a separate segregated fund of the Caucus and, as such, has solicited contributions outside the membership class in violation of

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2 U.S.C. § 441b(b)(4). If the Caucus is the connected organization of CBCPAC, CBCPAC solicitations are limited to the members of the Caucus. CBCPAC's April 14, 1983 solicitation clearly reached outside the membership of the Caucus. Therefore, the Office of General Counsel recommends that the Commission find reason to believe that the Congressional Black Caucus Political Action Committee and treasurers Congressman Clay and Congressman Stokes solicited contributions outside of the membership class in violation of 2 U.S.C. § 441b(b)(4).

Corporate and Labor Organization Contributions

2 U.S.C. § 441b(a) prohibits corporations and labor organizations from making contributions in connection with any federal election. Furthermore, § 441b(a) prohibits any political committee from knowingly accepting such contributions. The complainants allege that CBCPAC has accepted a number of contributions prohibited by § 441b(a). Complainants list the names of several organizations they believe are within the prohibited class and suggest that there may be others. The organizations named by complainants are as follows: Black Affairs, Inc.; Industrial Union Department - AFL-CIO Voluntary Fund; Association of Black Women Attorneys; Bullock Washateria and Food Mart; Fabricare Center; New Shiloh Baptist Church; United Church of Christ; Black Nurses Association of GWA; an incorporated health group of Bonner & Haitcock, MD's LTD; two sororities; and the Imhotep Fund.

The Industrial Union Department - AFL-CIO Voluntary Fund is not a labor union. It is a separate segregated fund of

the AFL-CIO registered with the Commission that is permitted to make contributions to CBCPAC and has not exceeded its limit with respect to CBCPAC. Respondents deny that Bullock Washateria & Food Mart, the Fabricare Center, the Imhotep Fund, and the sorority affiliate chapters are incorporated entities.

(Attachment II at pages 13-16). Our check with the appropriate secretaries of state confirmed that these organizations, as well as the United Church of Christ, are unincorporated.

Respondents have admitted, however, that CBCPAC accepted a number of contributions from incorporated entities. Specifically, corporate contributions were accepted from Black Affairs, Inc. (\$100), the New Shiloh Baptist Church (\$50), Bonner & Haitcock, M.D.'s LTD (\$25) and the Black Nurses Association of GWA (\$25). Respondents state that the acceptance of prohibited contributions was inadvertent, and that it is the policy of CBCPAC to refund all such contributions as soon as they are discovered. Where CBCPAC is unable to contact the original contributor, the money is donated to charity. Respondents state further that they are in the process of reverifying the status of all contributors to determine whether additional refunds must be made. (Attachment II at page 15). Respondents have offered to send copies of the returned checks for the refunds of prohibited contributions to the Commission as they become available. (Id. at page 13). Thus CBCPAC accepted two hundred dollars in corporate contributions that have been (or soon will be) refunded

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or donated to charity but maintains that the acceptance was inadvertent. The Office of General Counsel recommends, therefore, that the Commission find reason to believe that the Congressional Black Caucus Political Action Committee and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 441b(a) by accepting corporate contributions.

Complainant WLF also alleges that CBCPAC violated § 441b by accepting in-kind contributions from the Capitol Hill Hotel. The alleged contributions were for use of the hotel premises by CBCPAC as an office or a mail drop. Respondents maintain that the address of the hotel was used in anticipation of a large response to CBCPAC's April 14, 1983 solicitation. According to respondents, the Capitol Hill Hotel agreed to accept the mail in the hope of renting office space to CBCPAC some time in the future. However, CBCPAC has yet to make formal arrangements with the hotel. (See Attachment II at page 5). The Office of General Counsel recommends, therefore, that the Commission find reason to believe that the Capitol Hill Hotel violated 2 U.S.C. § 441b(a) by making an in-kind contribution to the Congressional Black Caucus Political Action Committee in permitting the Committee to use the hotel as a mail drop.

Failure to Include Section 441d Disclaimer on Solicitation

2 U.S.C. § 441d requires that any direct mail solicitation bear a disclaimer stating the name of the person who paid for the communication and whether or not the communication had been authorized by any candidate or candidate committee. The

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complainants allege that CBCPAC failed to include such a disclaimer in the text of its April 14, 1983 solicitation for contributions. An examination of a copy of the April solicitation confirms the allegation. (See WLF complaint). Respondents claim that the disclaimer was accidentally omitted. (Attachment II at page 3). However, complainants argue that two factors aggravate this violation. First, complainants allege that all of the members of CBCPAC are members of Congress, many of whom are themselves candidates. Thus the lack of a disclaimer raises the question whether the solicitation was paid for by the member candidates or their authorized committees. Furthermore, complainants allege that the violation was knowing and willful because respondent Congressman Stokes apparently admitted to a newspaper reporter that he saw the solicitation before it was mailed out to the public.

CBCPAC responded only to the second of these aggravating factors. According to CBCPAC, the letter seen by Congressman Stokes was in draft form and was not to be mailed as a final copy. CBCPAC also denies that Congressman Stokes authorized mailing the draft letter or that he had the requisite knowledge that the solicitation failed to contain the required disclaimer. (Attachment II at page 4).

CBCPAC does, however, admit the basic violation of § 441d alleged in this matter. Given the fact that the names of members of Congress, some of whom are candidates, appeared on the

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masthead of the April 14, 1983 solicitation as members of CBCPAC, the purpose of the § 441d disclaimer to provide the public with the identity of those persons paying for the solicitation may have been thwarted. The failure of CBCPAC to include a disclaimer appears to be, therefore, an actionable breach of the disclosure requirement of § 441d.

It does not appear, however, that the violation was knowing and willful. The knowing and willful standard of 2 U.S.C. § 437g(a)(5)(B) implies a conscious and intentional violation of the Act. The evidence, however, does not support a determination that the violation was intentional. Complainants offer only ambiguous remarks made by Congressman Stokes to a newspaper reporter as evidence. Respondents, on the other hand, deny that Congressman Stokes authorized mailing the draft of the April 14, 1983 solicitation he allegedly examined or that Congressman Stokes had knowledge of the mailing of the solicitation until after the fact. (Attachment II at page 4). Therefore, the Office of General Counsel recommends that the Commission find reason to believe that the Congressional Black Caucus Political Action Committee and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 441d.

#### Reporting Violations

Numerous reporting violations of the Act are alleged by complainants. Respondents admit most of these violations. However, the admitted violations are minor, and respondents have, in the main, already corrected them in amended reports.

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Respondents attribute these violations to the relative inexperience of the committee and maintain that, violations notwithstanding, CBCPAC is in substantial compliance with the Act.

For example, complainants allege that CBCPAC's original Statement of Organization was not timely filed. According to the complaint, the authorized committees of Congressmen Stokes and Clay made \$1,000 contributions respectively on November 17 and 18, 1982, triggering the definition of a political committee at 2 U.S.C. § 431(4)(A).<sup>4/</sup> 2 U.S.C. § 433(a) requires that a committee file a Statement of Organization with the Commission within 10 days of becoming a political committee within the meaning of § 431(4). Thus CBCPAC's Statement of Organization should have been filed by November 27, 1982, but was not filed until six days later, on December 3, 1982. In view of the fact that the statement was filed only six days late and was not critical to a pre-election period, the Office of General Counsel recommends that the Commission find reason to believe that the Congressional Black Caucus Political Action Committee and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 433(a) by failing to file a timely Statement of Organization, but take no further action.

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<sup>4/</sup> 2 U.S.C. § 431(4)(A) states that a political committee means "any committee, club, association, or other group of persons which receives contributions aggregating in excess of \$1,000 during a calendar year..."

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Further regarding the use of the Capitol Hill Hotel as a mail drop for the April 14, 1983 solicitation, complainants allege that such use constitutes a change of address from the post office box under which originally CBCPAC registered. Since CBCPAC reported no change of address, complainants assert that respondent CBCPAC is in violation of 2 U.S.C. § 433(c) for failure to report a change of address within 10 days. However, as discussed above, respondents maintain that the post office box remains the official address of CBCPAC, and that the address of the Capitol Hill Hotel was used for purposes of a mail drop for public response to the April 14, 1983 solicitation only. Respondents state that if and when the offices of CBCPAC are moved to the Capitol Hill Hotel, an amended Statement of Organization reflecting the change will be filed. (Attachment II at page 5).

Thus it appears that the CBCPAC has not, in fact, changed its address from the post office box of record. Therefore, the Office of General Counsel recommends that the Commission find no reason to believe that the Congressional Black Caucus Political Action Committee and treasurers Congressman Clay and Congressman Stokes have committed a violation of 2 U.S.C. § 433(c).

Complainants discuss each of the five reports filed by CBCPAC alleging various violations in each. Since several of the

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alleged violations occur in more than one report, we are grouping the allegations by section of the Act rather than by their chronological sequence in the reports.

The complainants identify several signature problems in CBCPAC's reports. 2 U.S.C. § 434(a)(1) requires the named treasurer of a political committee to sign each report. Complainants point out, however, that although the treasurer of CBCPAC was Congressman William L. Clay at the time of the CBCPAC's 1981 Year End Report, it was signed by Jerome M. Williams. Further, CBCPAC's July Quarterly Report for 1982 lists Louis Stokes as treasurer, but CBCPAC's Statement of Organization was not amended to reflect the change from Clay to Stokes as is required by 2 U.S.C. § 433(c). In the case of the July Quarterly Report for 1982, the Post General Report for 1982 and the October Quarterly Report for 1982, the complainants also question the authenticity of Congressman Stokes signature due to variations in its appearance from report to report.

Respondents have replied to these signature problems in their May 26, 1983 response to the Commission's notification of complaint (Attachment II) and in a supplemental response dated June 8, 1983, (Attachment IV). Respondents explain that Mr. Jerome Williams is the treasurer of Congressman Clay's authorized committee. Respondents state that Mr. Williams was inadvertently given a copy of the CBCPAC 1981 Year End Report,

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along with the report for Congressman Clay's authorized committee, and that he mistakenly signed CBCPAC's report.

Respondents admit that the change in treasurers from Congressman Clay to Congressman Stokes was not timely reported as required by § 433(c), but maintain that there was no intent to deceive the Commission. Respondents also admit that Congressman Stokes did not sign his name to the October 15 Quarterly Report for 1982, but rather directed another individual to do so since Congressman Stokes was out of town. Respondents state that all other signatures of Congressman Stokes are his own. (Attachment II at pages 8, 10 and 13 and Attachment IV at page 1).

CBCPAC has filed an amended Statement of Organization for the time period of the July Quarterly Report designating Congressman Stokes as the treasurer of CBCPAC.<sup>5/</sup> While the signature problems, like many of CBCPAC's other reporting problems probably reflect a lack of careful attention to detail, these defects are mitigated by the fact that the record has now been corrected. Therefore, the Office of General Counsel recommends that the Commission find reason to believe that the Congressional Black Caucus Political Action Committee and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 433(c) by failing to file a timely amendment to the Statement of Organization reflecting a change in treasurers.

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<sup>5/</sup> The current treasurer is Congressman Fauntroy as indicated by another amended Statement of Organization filed May 27, 1983.

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Another recurring problem in CBCPAC's reporting is the failure of the Committee to file reports with the Commission. CBCPAC instead filed only with the Clerk of the House of Representatives as would be appropriate for an authorized committee. 2 U.S.C. § 432(g)(1). Failure to file with the Commission allegedly occurred on the April Quarterly Report for 1982, the July Quarterly Report for 1982, the October Quarterly Report for 1982 and the November Post Election Report for 1982. Respondents admit these allegations, but in mitigation note that all reports were ultimately received by the Commission from the Clerk of the House of Representatives within the statutorily required time period, and that the problem has been corrected in the committee's filing procedures. (See Attachment II at pages 11, 12, 14 and 15). Therefore, the Office of General Counsel recommends that the Commission find reason to believe that the Congressional Black Caucus Political Action Committee and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 432(g)(4) by failing to file their reports with the Commission.

Referring to the July Quarterly Report filed by CBCPAC in 1982, complainants allege that respondents violated 2 U.S.C. § 434(b)(3)(A) by failing to report the name of employer and the occupation of a contributor by the name of A.J. McKnight. See also, 2 U.S.C. § 431(13). Respondents admit that the required information was omitted in the report, but explain that the information was not supplied by Mr. McKnight. The information has been requested by CBCPAC. (Attachment II at page 12). Given

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the fact that there was only one incident of misreporting a contributor, and given what appear to be the best efforts made by CBCPAC to obtain the information, CBCPAC should be deemed to be in substantial compliance with § 434(b)(3)(A). Therefore, the Office of General Counsel recommends that the Commission find no reason to believe that the Congressional Black Caucus Political Action Committee or treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 434(b)(3)(A).

Referring to the July Quarterly Report for 1982, the complainant alleges that there is no indication that CBCPAC paid federal and state withholding taxes for Georgiana Anderson-Land. Respondents explain that since Ms. Anderson-Land is an independent contractor and not a salaried employee, withholding taxes is not required. (Attachment II at page 14). Furthermore, the withholding of payroll tax is not within the jurisdiction of the Commission. Therefore, the Office of General Counsel recommends that the Commission take no jurisdiction over this issue. In that the allegation relates to a singular incident involving only \$200, we are not recommending a referral to the Internal Revenue Service.

Complainants allege that Schedule B of the CBCPAC's July Quarterly Report for 1982 shows a payment for printing services to David R. Ramage, Inc. for printing envelopes and cards. Complainants reason that the location of this printer in the Longworth House Office Building near the offices of Congressman Clay is further evidence that CBCPAC used Congressman Clay's offices as a base of operations. However, this allegation is

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irrelevant to the question of whether Congressman Clay's office was used for CBCPAC operations and constitutes no allegation of a violation within the jurisdiction of the Commission. (See Attachment II at page 14). The Office of General Counsel, therefore, recommends that the Commission take no jurisdiction on this issue.

Finally, complainants allege that the sources for \$501 reported in CBCPAC's Year End Report for 1982 should have been itemized. 2 U.S.C. § 434(b)(3)(A), however, requires only those contributions over \$200 to be itemized. CBCPAC has stated that all of the contributions comprising this total were less than \$200. (Attachment II at page 16). Therefore, the Office of General Counsel recommends that the Commission find no reason to believe that the Congressional Black Caucus Political Action Committee or treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 434(b)(3)(A) by failing to report the sources of certain contributions from individuals.

#### RECOMMENDATIONS

The Office of General Counsel recommends that the Commission:

1. merge MUR's 1550, 1551 and Pre-MUR 107;
2. find reason to believe that the Congressional Black Caucus is the connected organization of the Congressional Black Caucus Political Action Committee for purposes of 2 U.S.C. § 431(7);

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3. find reason to believe that the Congressional Black Caucus Political Action Committee and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 433(b)(2) by failing to report the name, address, relationship and type of its connected organization, the Congressional Black Caucus;

4. find no reason to believe that any authorized committee contributing to the Congressional Black Caucus Political Committee is affiliated with the Congressional Black Caucus Political Action Committee for purposes of 11 C.F.R. § 100.5(g) of the Commission Regulations;

5. find reason to believe that the Congressional Black Caucus Political Action Committee and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 441b(b)(4) by soliciting contributions outside of the membership class of the Congressional Black Caucus;

6. find reason to believe that the Congressional Black Caucus Political Action Committee and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 441b(a) by accepting corporate contributions;

7. find reason to believe that the Capitol Hill Hotel violated 2 U.S.C. § 441b(a) by making an in-kind contribution to the Congressional Black Caucus Political Action Committee in permitting the Committee to use the hotel as a mail drop;

8. find reason to believe that the Congressional Black Caucus Political Action Committee and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 441d by failing to

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include the required disclaimer stating the name of the person paying for the costs of a solicitation dated April 14, 1983;

9. find reason to believe that the Congressional Black Caucus Political Action Committee and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 433(a) by failing to file a timely Statement of Organization, but take no further action;

10. find no reason to believe that the Congressional Black Caucus Political Action Committee or treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 433(c) by failing to report a change of address;

11. find reason to believe that the Congressional Black Caucus Political Action Committee and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 433(c) by failing to file a timely amendment to their Statement of Organization reflecting a change in treasurers;

12. find reason to believe that the Congressional Black Caucus Political Action Committee and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 432(g)(4) by failing to file reports with the Commission;

13. find no reason to believe that the Congressional Black Caucus Political Action Committee or treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 434(b)(3)(A) by failing to report the employer and occupation of contributor A.J. McKnight;

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14. take no jurisdiction with respect to the alleged failure of the Congressional Black Caucus Political Action Committee to pay federal and state withholding taxes for Georgiana Anderson-Land;

15. take no jurisdiction with respect to the issue of whether Congressman Clay's House Offices were used for Congressional Black Caucus Political Action Committee operations;

16. find no reason to believe that the Congressional Black Caucus Political Action Committee or treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 434(b)(3)(A) by failing to report the sources of certain contributions from individuals; and

17. approve the attached letters.

Charles N. Steele  
General Counsel

August 17, 1983  
Date

BY:

Kenneth A. Gross  
Associate General Counsel

Attachments

- I. Department of Justice referral dated June 10, 1983, (7 pages).
- II. Response of CBCPAC dated May 26, 1983, (34 pages).
- III. Response of the Congressional Black Caucus dated May 26, 1983, (3 pages).
- IV. Supplementary response of CBCPAC dated June 8, 1983, (4 pages).
- V. Letters to respondents with questions.

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Washington, D.C. 20530

10 JUN 1983

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

Dear Mr. Steele:

We recently received a complaint involving a possible violation of the disclaimer requirements of the Federal Election Campaign Act by an organization called the "CBC - Political Action Committee." A copy of this complaint is enclosed herein.

We do not believe this matter warrants criminal disposition, and we are accordingly referring it to the Commission for whatever action the FEC deems appropriate. We have advised the complainant, Louis Wm. Barnett of the "Citizens for the Republic" Committee, of our referral of this matter to you. (A copy of our response is also enclosed.)

Sincerely,

Gerald E. McDowell, Chief  
Public Integrity Section  
Criminal Division

By:

*Nancy S. Stewart*  
NANCY S. STEWART, Attorney  
Public Integrity Section

Enclosures

Attachment I

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LYN NOFZIGER  
Chairman

ARTHUR J. DELLINGER  
Treasurer

CURTIS MACK  
Executive Director

<sup>27</sup>  
May 3, 1983

Public Integrity Section  
Attn: Nancy Stewart  
Staff Attorney  
Criminal Division  
U. S. Department of Justice  
P. O. Box 50168  
F Street Station  
Washington, D. C. 20004

Dear Ms. Stewart:

Enclosed please find a letter which I received <sup>from weeks ago</sup> ~~last Friday~~  
from a group or organization called the "CBC - POLITICAL ACTION  
COMMITTEE."

I am bringing this letter to your attention due to the apparent  
us of the United States Seal on the carrier envelope and on the  
letterhead.

I believe that this is a violation of federal law and, possibly,  
of the Rules of the United States House of Representatives.

Further, there is no statement to the effect that the material  
was 'paid for by' anyone or any organization . . . an apparent  
violation of Federal Election Commission law or regulation.

Please advise me of the disposition of this matter.

Sincerely

*Louis Wm. Barnett*

Louis Wm. Barnett  
Political Director

RECEIVED

JUN -2 1983

Public Integrity Section

Encl.: (3)





## CBC-POLITICAL ACTION COMMITTEE

Congressman William "Bill" Clay, Chairman  
 Congressman Mervyn M. Dymally, Vice-Chairman  
 Congressman Louis Stokes, Treasurer

April 14, 1983

### MEMBERS

Congressman William "Bill" Clay  
 Congresswoman Cardiss Collins  
 Congressman John Conyers  
 Congressman George W. Cockett, Jr.  
 Congressman Ronald V. Dellums  
 Congressman Julian C. Dixon  
 Congressman Mervyn M. Dymally  
 Congressman Walter E. Fauntroy  
 Congressman Harold E. Ford  
 Congressman William H. Gray III  
 Congresswoman Katie Hall  
 Congressman Augustus F. Hawkins  
 Congressman Mickey Leland  
 Congressman Parren J. Mitchell  
 Congressman Major A. Owens  
 Congressman Louis Stokes  
 Congressman Edolphus Towns  
 Congressman Harold Washington  
 Congressman Alan Wheat

David E. Greene, Executive Director

Mr. Arthur J. Dellinger, Jr.  
 Suite 200 1253 7th Street  
 Santa Monica, CA 90401

Dear Mr. Dellinger, Jr.:

As a Political Action Committee (PAC) official, you should be aware that a major push is now underway to further control and limit the growth of political action committees as we know them. This move must not be taken lightly. The CBC-PAC is currently mounting a campaign designed to acquire support for allowing political action committees to continue to function in their current form, even though we may support some moderate adjustments over the medium and long term.

HOW MAY YOU HELP? There are two (2) specific ways.

You have surely noticed that our PAC consists entirely of Congressmen. If you are willing to send me a strong letter of support for the continued existence of PACs as we now know them, your letter will definitely be channeled into influential Congressional hands sympathetic to the existing PAC philosophy.

In addition, we are a multicandidate PAC and would appreciate a donation of \$5,000 as soon as possible. We perceive the threat to existing PACs as real even if misdirected and the need for funds to finance candidates who support our position in this matter is essential. If you are unable to send the full amount of \$5,000 at this time, send whatever you can as soon as possible. If, on the other hand, you are unable to send us a contribution now, please send the letter of support. We will use it.

Mr. Dellinger, Jr., the time has most certainly come upon us when PACs need to wield a unified sword from a position of political and economic strength.

I look forward to meeting you personally and discussing the issues pertinent to your particular membership at your earliest convenience.

Sincerely,

David Greene  
 Executive Director

Enclosure 4

Address: Suite 600, 200 C Street, S.E., Washington, D.C. 20003

We have no permanent enemies/We have no permanent friends/Only permanent interests.

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**CBC-POLITICAL ACTION COMMITTEE**

Suite 800, 200 C Street, S.E.  
Washington, D.C. 20003



Mr. Arthur J. Dellinger, Jr.  
Suite 200 1253 7th Street  
Santa Monica, CA 90401

PACs, THE TAXPAYER, AND  
CAMPAIGN FINANCE REFORM

Reproduced with permission from the author; Paul D. Kamenar, director of Litigation, Washington Legal Foundation. (Page one of nineteen.)

### Introduction

When Walter Mondale formally announced on February 21, 1983, his candidacy for the Democratic nomination for the office of President of the United States, he promised that he would refuse to accept political action committee (PAC) contributions for his campaign. At the same time, he pledged his support for proposals that would extend government financing to all federal elections.

Similar positions taken by Senator Gary Hart and others seem to be the latest response to the steady drumbeat, by groups such as Common Cause and by the media throughout the 1983 elections, against PACs and their alleged pernicious effects on the electoral process. The claim is that corporate, trade association, and other "special interest" PACs allegedly "buy" the votes of congressmen with contributions for their increasingly expensive campaigns, and that this erodes the confidence of the public in their elected officials.

Special criticism is heaped against those PACs that engage in independent expenditures because such efforts allegedly exploit the "loopholes" in the election law's strict limits on campaign contributions and are made by groups that critics claim are unaccountable to the political system. The solution prescribed for these "problems" is to eliminate or sharply curtail PAC contributions and independent expenditures, and to substitute public financing for congressional and senatorial elections similar to that provided for presidential elections. These proposals introduced in the last Congress, are now being reintroduced in the 98th Congress. Hearings are held before the Senate Rules Committee in late January, and more are expected before that Committee and the House Administration Committee as well as later this spring.

The trouble is that the "reform" proposals largely ignore (1) that PACs in fact play a relatively minor role in financing federal elections; (2) that the source of PAC money is many individuals who share common beliefs and voluntarily pool small contributions; (3) that PAC contributions are fully disclosed whether their elected leaders are voting in the constituents', or some "special," interest; (4) that the so-called loophole exploited by independent expenditures is nothing less than the First Amendment right of free speech and association; (5) that the great majority of the American public opposes taxpayer financing of elections; and (6) that more regulation will only increase the power of the Federal Election Commission, a bureaucracy that has consistently trampled upon basic rights and freedoms, the latest example of which, discussed briefly herein, are proposed FEC regulations sent to Congress for its consideration on March 1, 1983, which, if not vetoed, would seriously limit the rights of corporations and expand those of unions.

It might well be healthier for the electoral process and more in the public interest not to curtail PACs and private contributions. Instead, the political process should be opened further to encourage more direct citizen involvement in democracy's fundamental function: the selection of its leaders.

This enclosure is for information purposes only and its inclusion does not necessarily indicate an acceptance of the author's views by the CBC-PAC.



Washington, D.C. 20530

Mr. Louis Wm. Barnett  
Political Director  
Citizens for the Republic  
1253 Seventh Street  
Suite 200  
Santa Monica, California 90401

Dear Mr. Barnett:

This is in response to your letter and enclosures of May 27, 1983, regarding a political solicitation you received from an entity called the "CBC - Political Action Committee" which bears on its stationery a likeness of the great seal of the United States. You question the appropriateness of such a use of the great seal.

Section 713 of Title 18 of the United States Code prohibits the knowing display of any likeness or facsimile of the great seal of the United States on stationery in a manner calculated to convey the false impression of sponsorship or approval by the United States Government.

In response to a previous complaint of a similar nature, we recently advised the Director of the CBC-PAC of the existence of the prohibition in 18 U.S.C. §713 and its applicability to that Committee's fundraising efforts. A copy of our letter in this regard is enclosed herein for your information.

You also state that the CBC-PAC solicitation may be in violation of the Federal Election Campaign Act of 1971, as amended (2 U.S.C. §431, et seq), in that it does not contain a statement as to who paid for the solicitation. To the extent that the CBC-PAC may have failed to include all the information required by the FECA, see 2 U.S.C. §441d, we have referred this matter to the Federal Election Commission, which has enforcement responsibility with respect to such matters. We trust that you will receive a reply from the FEC regarding this aspect of your complaint.

Thank you for your interest and concern in  
referring this matter to us.

Sincerely,

Gerald E. McDowell, Chief  
Public Integrity Section  
Criminal Division

By:

*Nancy S. Stewart*

NANCY S. STEWART, Attorney  
Public Integrity Section

Enclosure

84040460387

AMY ROBERTSON GOLDSON  
ATTORNEY AT LAW

4015 28TH PLACE NORTHWEST  
WASHINGTON, D. C. 20008  
(202) 966-7831

May 26, 1983

JUN 26 PM 4:16

BY HAND

Lee Anderson, Esquire  
Federal Election Commission  
1325 K Street, N.W. - 7th Floor  
Washington, D.C. 20463

RE: MUR 1551 and 1550

Dear Mr. Anderson:

On behalf of the Congressional Black Caucus Political Action Committee, Congressman Louis Stokes and Congressman William Clay, submitted herewith is a response to the complaint filed by the Washington Legal Foundation and Fund For A Conservative Majority.

After you have had an opportunity to review the responses, we are hopeful that you will conclude that the Congressional Black Caucus Political Action Committee (CBC-PAC), Congressman Louis Stokes, and Congressman William Clay are in substantial compliance with the Federal Election Campaign Act of 1971, as amended. Accordingly, it is respectfully urged that no further action be taken against the respondents.

In those instances where a technical violation in preparing reports has occurred, those reports have been corrected by filing amended reports. In the situations which involve receipt of corporate contributions (average dollar amount: \$30, all such contributions were less than \$100) corrective action has been taken to return those contributions. Copies of cancelled refund checks will be filed with the Federal Election Commission once they are returned.

The CBC-PAC will endeavor to insure that all future solicitations contain the proper disclaimer.

The CBC-PAC has been in existence for approximately eighteen (18) months. While its short life neither relieves the CBC-PAC of the responsibility of compliance nor excuses the "de minimus" technical violations to which it has responded, immediate steps are underway to insure that such violations do not reoccur and that all future conduct conforms to the law.

Attachment II

①



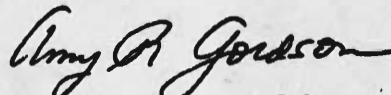
Lee Anderson, Esquire  
May 26, 1983  
Page 2

With respect to some of the allegations contained in the complaints, no provision of the Federal Election Campaign Act of 1971, as amended, covers the situation. Nor is there any provision of law within the jurisdiction of the FEC that relates to some of the allegations.

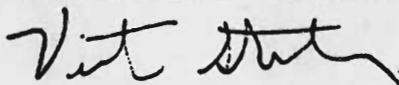
Victor Sterling, Esquire, my co-counsel in these cases, and I are available to discuss these matters with you at your earliest convenience.

In the event that you have any questions or comments relative to the enclosed, please do not hesitate to so advise.

Sincerely,



Amy Robertson Goldson



Victor Sterling

ARG:crw

Enclosures

cc: The Honorable Louis Stokes  
The Honorable William Clay

84040460389

Before The  
FEDERAL ELECTION COMMISSION  
UNITED STATES OF AMERICA

|                                       |   |                       |
|---------------------------------------|---|-----------------------|
| CONGRESSIONAL BLACK CAUCUS POLITICAL) | ) |                       |
| ACTION COMMITTEE a/k/a CBC-PAC        | ) |                       |
|                                       | ) |                       |
| CONGRESSMAN LOUIS STOKES              | ) | Matter Under Review   |
|                                       | ) | (MUR) No. <u>1551</u> |
| CONGRESSMAN WILLIAM L. CLAY           | ) |                       |

RESPONSE TO COMPLAINT BY THE  
WASHINGTON LEGAL FOUNDATION

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The Congressional Black Caucus Political Action Committee (hereinafter "CBC-PAC"), Congressman Louis Stokes and Congressman William L. Clay, by their attorneys, in response to the complaint filed herein, state as follows:

1. With respect to the allegations contained at paragraph 1, page 3, of the complaint, respondents state that a false address was not used. The address, Suite 600, 200 C Street, S.E., Washington, D.C. 20003, was merely a mailing address used in anticipation of receipts from a large solicitation.

The remaining allegations fail to state violations of any statute within the jurisdiction of the FEC but if a response is required, the remaining allegations are denied.

2. With respect to the allegations contained at paragraph 1(a), page 4 of the complaint, respondents admit that the solicitation did not identify who paid for the communication and whether it was authorized by any candidate or candidate's committee. The disclaimer was inadvertently not included. All future

solicitations will contain the required disclaimer.

With respect to the allegations concerning Congressman Louis Stokes, Congressman Stokes states that the letter which he saw "before it went out" was only a draft and was not to be mailed as a final letter. He did not authorize the mailing of this letter nor did he have knowledge of its being mailed until after the fact. Therefore, Congressman Stokes would have no knowledge as to whether said letter did or did not contain the required disclaimer.

3. In response to the allegations contained at paragraph 1(b), page 4 of the complaint, respondents state that the official mailing address of the CBC-PAC for purposes of the FEC, has never changed and is still P. O. Box 2006, Washington, D.C. 20013. Respondents admit that said mailing address is a post office box located in the main post office.

Respondents admit that there is no payment for the rental of the post office box listed in the CBC-PAC's disclosure reports filed with the FEC prior to August 11, 1982. This omission was a matter of oversight. An amended report has been filed which reflects the payment by D. C. Friends of "Bill" Clay in the amount of \$22.00 for the cost of the box, a copy of which is attached hereto as Exhibit A. Congressman Stokes states that he had no prior knowledge of the payment of \$22.00 for the U. S. post office box, nor did he question the facts concerning the rental of the U. S. post office box.



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Respondents, CBC-PAC and Clay, deny that the CBC-PAC has received an in-kind contribution from the Capitol Hill Hotel in the form of using its premises at 200 C Street, S.E., Washington, D. C. The Capitol Hill Hotel agreed to accept the mail as part of a commercial business transaction in anticipation of the rental of office space by the CBC-PAC. Respondent, Congressman Stokes, states that he did not authorize any arrangement of any kind with the Capitol Hill Hotel, nor did he have any knowledge of the use of the Capitol Hill Hotel as a mailing address or for any other purpose.

In the event that the CBC-PAC obtains office space at the Capitol Hill Hotel, any such change in address will be reported to the FEC within 10 days pursuant to 2 U.S.C. §433(c). As previously indicated, the official address of the CBC-PAC still remains P. O. Box 2006, Washington, D.C. 20013. The purpose of using the Capitol Hill Hotel as a mailing address was merely in anticipation of receipts from a large solicitation.

4. With respect to the allegations contained at paragraph 2(a), page 6, respondents, CBC-PAC and Clay, admit that the Statement of Organization may have been filed a couple of days late. The Thanksgiving holiday weekend delayed its preparation and submission. Congressman Stokes lacks personal knowledge sufficient to form a belief as to the truth of this allegation.

5. In paragraph 2(a), page 6, complainant has alleged that the CBC-PAC failed to list the name of any connected organization or political committee in its Statement of Organization. In this

regard, complainant contends that the Congressional Black Caucus is a connected organization of the CBC-PAC. Respondents emphatically deny this allegation.

The Congressional Black Caucus, is a legislative service organization, comprised of the black members of the United States Congress. It is a grouping of members who pool resources to pursue a common legislative goal. Thus, the Congressional Black Caucus functions as an extension of the individual offices of the black members of Congress and as such, coordinates their efforts for reasons of efficiency and effectiveness.

The black members of Congress who comprise the Congressional Black Caucus pay dues or assessments from personal funds or from their allowances for official expenses to ensure a dependable resource to pay fluctuating administrative costs. The Congressional Black Caucus, as a matter of law, does not hold corporate status.

The CBC-PAC is the brainchild of several of the black members of Congress acting in their individual capacities. It is an independent political committee and does not and was never intended to be connected to the legislative service organization. A copy of the "talking" paper used in this regard is attached hereto as Exhibit B.

At its inception, various names had been considered for this contemplated independent political committee. It was finally decided to call it the Congressional Black Caucus Political Action Committee (or CBC-PAC, an acronym frequently used for brevity)

because it was felt that such a name would have wide recognition and mass appeal.

Although the CBC-PAC utilizes the name and/or the clearly recognized acronym (CBC) used by the Congressional Black Caucus legislative service organization, it is not and was never intended to be a separate segregated fund established pursuant to 11 CFR 102.1(c). See original Statement of Organization, line 5(f) and amended statement. The Congressional Black Caucus did not provide the CBC-PAC with any "seed" money to fund its initial operations, it did not provide staff, office space or any other such administrative support or supplies.

Respondents admit that some of the black members of Congress or their authorized political committees have contributed to the CBC-PAC, just as they or their political committees have also contributed to other political committees. However, there is no similar pattern of contributions which has been made by all of the black members of Congress to the CBC-PAC and further there has been no transfer of funds between the CBC-PAC and other committees which represents a substantial portion of the funds of either the transferor or transferee committees.

The following contributions were made to the CBC-PAC by the black members of Congress or by their authorized committees: D.C. Friends of Bill Clay (\$1,000); Louis Stokes for Congress Committee (\$1,000); Committee for Fauntroy (\$1,000); Julian C. Dixon Democrat for Congress (\$1,000 - loan); Crockett for Congress Committee (\$1,000 - loan); Bill Gray for Congress Committee (\$1,000);



Dymally for Congress Committee (\$1,000); Leland for Congress (\$1,000); Parren Mitchell Campaign for Congress (\$1,000).

The fact that these contributions were made by the political committees of the individual members does not in and of itself mean that their authorized committees are affiliated with the CBC-PAC, just as the authorized committees that contribute to other PAC's such as the National Congressional Club are not considered affiliated with the NCC-PAC.

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The fact that some officers of the CBC-PAC are officers or members of other political committees does not necessarily constitute affiliation. See AO 1975-35, Fed. Elec. Camp. Fin. Guide (CCH) ¶5120 (Sept. 18, 1975) - indiv. may be officers of more than one political committee. See also MUR 961 (Apr. 21, 1981) where several board members of PAC A later became board members of PAC B, this factor alone was insufficient to show affiliation. In fact, several members of the Congressional Black Caucus also serve on the House Democratic Campaign Committee, including Congressman Clay, the chairman of the CBC-PAC. Obviously, the House Democratic Campaign Committee is not a connected committee of the CBC-PAC or vis versa.

It must be noted that neither the Congressional Black Caucus legislative service organization nor the authorized political committees of the individual Congressmen have the power, authority, or ability to hire, appoint, discipline, discharge, remove or influence the decisions of the officers or members of the CBC-PAC.

Such decisions are made by some of the black members of Congress in their individual capacity.

Respondents further deny that the Congressional Black Caucus Foundation, Inc. (hereinafter referred to as CBCF) is another connected organization. The CBCF is a 501(c)(3) non-partisan corporation which was founded exclusively for charitable, scientific and educational purposes. Motivated by the extreme underrepresentation of blacks and other minorities on Capitol Hill legislative staffs, and recognizing the importance of training young blacks to participate more fully in all aspects of the legislative process, the CBCF's graduate legislative intern program was inaugurated. In addition, the CBCF's activities also include research and analyses of a non-partisan nature, but primarily focused on the problems which plague the black community.

The CBCF is controlled and operated by its Board of Directors. The members of the Board include some of the black members of Congress, businesspersons, lawyers, educators and scholars. While admittedly Congressman Louis Stokes was voted by the Board to serve as President and Chairman of the CBCF, and Congressman William Clay serves as a member of the Board of Directors, there is no indicia of control or any connectedness between the CBCF and the CBC-PAC. Pursuant to its by-laws, all CBCF policies and major operational decisions are collectively determined by a majority of the members of the Board of Directors of the CBCF. Of the twenty-one members of the Board of Directors of the CBCF, only eight persons are members of Congress.

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In light of the foregoing, respondents deny that they have violated the federal election laws by failing to disclose all the "connected organizations" as well as "affiliated committees" on the Statement of Organization in that there are no connected organizations or affiliated committees.

6. With respect to the allegations contained at paragraph 3(a), page 8 of the complaint, respondents, CBC-PAC and Congressman Clay admit that the report was incorrectly and inadvertently signed by Jerome M. Williams. (See statement of Jerome Williams, attached as Exhibit C.) An amended report will be filed to properly reflect the signature of Congressman Clay, the treasurer of the CBC-PAC at the time. Congressman Louis Stokes lacks personal knowledge sufficient to form a belief as to the truth of this allegation.

7. Respondents, CBC-PAC and Congressman Clay deny that the Congressional offices of Congressman William L. Clay were used to support the private endeavors of the CBC-PAC. The total number of hours expended on secretarial and bookkeeping for the entire thirteen (13) months (December, 1981 thru December, 1982) consisted of less than twenty (20) hours.

a. The five (5) reports which were filed with the Federal Election Commission consisted of thirty-two (32) pages of typing on printed forms. [Approximate time for typing each report was thirty (30) minutes. Approximate total time: 2 hours and 30 minutes.]

b. Tax forms for 1981 and 1982 consisted of one (1) page each. [Approximate time for typing was 15 minutes.]



Approximate total time: 30 minutes.]

c. Recording of approximately 600 mail contributions and depositing them in the bank was 5 hours. [Approximate total time: 5 hours.]

d. Writing of 45 checks approximately 1 hour. [Approximate total time: 1 hour.]

e. Miscellaneous correspondence estimate of 10 hours. [Approximate total time: 10 hours.]

f. Anise Jenkins was paid the sum of \$250.00 for bookkeeping services.

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Congressman Louis Stokes lacks personal knowledge sufficient to form a belief as to the truth of this allegation.

CBC-PAC is administered as many political committees which have no need for elaborate offices, telephones, employees, typewriters. It is financed by funds solicited through the mail and that service is contracted out to firms that specialize in direct mail services. Those firms are paid to do the printing, addressing, mailing, etc. Respondent, Clay states that all secretarial work was performed during off duty hours at the homes of Anise Jenkins and Dr. Georgiana Land.

8. With respect to the allegations contained at paragraph 4, page 9 of the complaint, respondents, CBC-PAC and Congressman Clay admit that the second report, the April 15 Quarterly Report, was incorrectly filed with the Clerk of the House of Representatives, an ex officio commissioner of the FEC. Respondents will assure that this honest error, which was a matter of inadvertence, will

not reoccur in the future. In any event, the second report was timely received by the FEC. Congressman Stokes lacks personal knowledge sufficient to form a belief as to the truth of this allegation in that he did not hold the office of treasurer.

9. With respect to the allegations contained at paragraph 5(a), page 10 of the complaint, concerning the July 15, 1982 Quarterly Report, respondents admit that the report was filed with the Clerk of the House, an ex officio commissioner of the FEC, rather than with the FEC. This was a matter of oversight, although the report was timely received by the FEC. Respondents will assure that this honest error will not reoccur in the future.

10. With respect to the allegations contained at paragraph 5(b), page 10 of the complaint, an amended statement of organization has been filed with the FEC to reflect that Congressman Stokes held the position as treasurer. The failure to report said change is a minor technical violation which was the product of honest error and not conscious deception.

11. With respect to the allegations contained at paragraph 5(c), page 10, concerning Congressman Stokes' signature, respondents state that the report bears the signature of Congressman Stokes.

12. Respondents admit that the name of the employer of and occupation of A. J. McKnight were not indicated, as alleged at paragraph 5(d), page 10 of the complaint. This information, which was not originally supplied by A. J. McKnight and as such, inadvertently omitted, has been requested and will be supplied upon receipt. A copy of this request is attached as Exhibit D.

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13. With respect to the allegations contained at paragraph 5(e), page 10 of the complaint concerning a \$100 contribution received from the "Black Affairs Center, Inc.", respondents respectfully admit that said amount was accepted but that this acceptance was a matter of oversight. The policy of the CBC-PAC is to return such prohibited contributions or in such cases where the donor cannot be located, to donate such contributions to charitable organizations. In view of the fact that the Black Affairs Center, Inc. could not be located, their \$100 contribution has been donated to a tax exempt organization. A copy of the cancelled check will be provided once it has been returned.

14. Respondents deny the allegations contained at paragraph 5(f), page 11 of the complaint. Industrial Union Division - AFL-CIO is a union PAC and as such, contributions are properly acceptable.

15. With respect to the allegations contained at paragraph 5(g), page 11 of the complaint, respondents deny that Bullock Washateria & Food Mart and Fabricare Center are incorporated entities. A \$50.00 contribution was accepted from the New Shiloh Baptist Church due to an honest mistake of fact. This amount has been returned to the contributor. A copy of the cancelled check will be supplied once it is returned. Contributions which have been received from churches (all \$100.00 or less) are being verified to insure compliance. A copy of the cancelled checks relative to all refunds will be supplied once returned. Respondents submit



that such errors were honest mistakes in fact and not deliberate or reckless violations.

16. Respondents deny the allegations contained at paragraph 5(h), page 11 of the complaint in that Ms. Georgiana Anderson-Land is an independent contractor and not a salaried employee. As such, CBC-PAC is not obligated to withhold federal and state taxes. In any event, no provision of the Federal Election Campaign Act, as amended, covers such a situation.

17. Respondents deny that the allegations contained at paragraph 5(i), page 12 constitute any violation. Mr. Ramage is a printer whose services are utilized by many authorized and unauthorized political committees. The fact that the printer is located in the Longworth House Office Building is irrelevant. Congressman Clay denies that he used his office to operate the CBC-PAC.

18. With respect to the allegations contained at paragraph 5(j), page 12 of the complaint, respondent Clay admits that the required disclaimer notice was mistakenly not included. Congressman Stokes states that he has never signed nor authorized the mailing of any letters of solicitation and therefore has no knowledge with respect to whether such direct mail solicitations did or did not carry the required disclaimer. All future solicitations shall bear the necessary disclaimer required by law.

19. With respect to the allegations contained at paragraph 6(a) and (b), page 12 of the complaint, respondents admit that the failure to file the report with the FEC was due to honest error. The report however was timely received by the FEC. This violation

shall not reoccur in the future. As to the signature of Congressman Stokes, respondent Stokes states that the report was signed at his direction, by another individual in view of the fact that Congressman Stokes was out of town. There was no intent to deceive. In any event, an amended report filed with the FEC bears Congressman Stokes' actual signature, a copy of which is attached hereto as Exhibit F.

20. With respect to the allegations contained at paragraph 6(c), page 12 of the complaint, respondents respectfully admit that a \$25.00 contribution was received from Bonner & Haitcock, M.D.'s Ltd. Acceptance of this contribution from an incorporated health group was due to a mistake of fact. In any event, this contribution has been refunded. A copy of the cancelled check shall be provided once it is returned. Respondents are still attempting to verify the legal status of the Black Nurses Association of GWA. The contributions received from sororities are from unincorporated affiliate chapters and as such, may contribute to the CBC-PAC. All receipts are being re-examined to insure full compliance. Any improper contributions shall be refunded or donated to charity in cases where the donor cannot be located.

21. Paragraph 6(d), page 13 alleges no violation. P.O. Box 2006 remains the current address of the CBC-PAC.

22. In response to the allegations contained at paragraph 7, page 13 of the complaint, respondents admit that the report was not filed with the FEC for the reasons as previously set forth. The report properly bears the signature of Congressman Stokes.

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The "Imhotep Fund" check was mailed to the CBC-PAC by Dr. Alfred Hayes, M.D., Los Angeles, CA. His secretary, Claudia Gay states that the contribution was from a political fund. Respondent denies any violation as inferred in paragraph 7(d). All expenditures which were paid (not incurred) were reported.

23. With respect to the allegations contained in paragraph 8(a), page 14 of the complaint, respondents deny any violation of the FEC laws in that the contributions, all of which were less than \$200.00, were reported as a lump sum pursuant to 2 USC §434 (b)(2)(A). There is no requirement that such contributions be itemized.

24. Respondents deny that any violation of the FEC laws has been alleged in paragraph 8(b), page 14 of the complaint. Although the report was sent in an official U. S. House of Representatives envelope, that envelope contained the proper postage. All expenses which were incurred have been reported.

The fact that Ms. Jenkins' business address in Congressman Clay's office is listed as her mailing address, does not support the inference that Congressman Clay used his official office for the operation of the CBC-PAC. It is not unusual for an individual to provide the address of their customary place of employment as a mailing address. The CBC-PAC collects 100% of its income by utilizing independent direct mail firms and has not needed offices, supplies and equipment.



CONCLUSION

While respondents have admitted certain technical violations, and although respondents do not condone violations of the letter of the law, respondents contend that the alleged violations are de minimis, were the result of honest error and not conscious deception, and have been substantially cured. Accordingly, respondents respectfully request that no further action be taken against any of them.

Respectfully submitted,

The Congressional Black Caucus  
Political Action Committee

Congressman Louis Stokes

Congressman William Clay

By:

*Amy R. Goldson*  
AMY ROBERTSON GOLDSON  
4015 28th Place, N.W.  
Washington, D.C. 20008  
(202) 966-7531

By:

*Victor Sterling*  
VICTOR STERLING  
725 Eighth Street, S.E.  
Washington, D.C. 20003  
(202) 546-8700

Dated: May 26, 1983

Attorneys For Respondents

(Summary Page)

ALIGN AREA

ALIGN AREA

## 1. Name of Committee (In Full)

Congressional Black Caucus  
Political Action Committee

## Address (Number and Street)

P. O. Box 2006

## City, State and ZIP Code

Washington, D. C. 20013

☐ Check here if address is different than previously reported.

## 2. FEC Identification Number

097683

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 ☒ October 15 Quarterly Report☐ July 15 Quarterly Report ☐ January 31 Year End Report☐ July 31 Mid Year Report (Non-Election Year Only)☐ Monthly Report for \_\_\_\_\_☐ Twelfth day report preceding \_\_\_\_\_ (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 7/1/82 through 9/30/826. (a) Cash on hand January 1, 19 82

(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 Line 6(d))

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

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

Hon. Louis Stokes

Type or Print Name of Treasurer

SIGNATURE OF TREASURER

Date

5/26/83

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)

Exhibit A

**CONGRESSIONAL BLACK  
POLITICAL ACTION COMMITTEE**

The United States Congress decides the economic, social and political direction of America. The U.S. Congress will decide how over seven (7) trillion dollars will be spent in the decade of the eighties. The decisions of the U.S. Congress have a direct impact on how 220 million people in this country will live.

The decisions made by the U.S. Congress have even greater impact on more than 26 million Black Americans and some additional 40 million other Americans who live below the officially established poverty line.

The Black members of Congress have been the only consistent voice in the U.S. Congress for the interest of Black people and the truly needy.

There are 435 seats in the House of Representatives. There are 100 seats in the U.S. Senate.

There are 26 million Black people in the United States. If Black people had seats in the U.S. Senate equal to the Black population there would be 11 Black senators. If Black people held seats in the House of Representatives equal to the Black population there would be 48 Black congress persons. Today there are only 18 Black members in the House of Representatives and no Black members of the Senate.

The lack of Black numerical strength in the U.S. Congress has caused Black and poor people to suffer irreparable damage as a direction is being taken in the U.S. Congress away from the poor and needy.

The present Black members of Congress stand together to resist this movement away from the poor and needy by forming "The Congressional Black Political Action Committee."

The Congressional Black Political Action Committee's Board of Directors will be the Black members of Congress.

The Congressional Black Political Action Committee exists for the following purposes.



. To advocate the interest of Black and poor people in the nation so as to impact legislation on their behalf in the U.S. Congress.

. To raise money for and work for Black candidates to Congress so as to increase the number of seats held by Black members of Congress.

. To form a National network in the more than 110 congressional districts where Black people are more than 15% of the population, for the purpose of holding the Representatives of those districts accountable on critical legislation that effects the interests of Black and poor people.

. To conduct educational seminars and forums in critical congressional districts so as to help Black and poor people in those districts elect members to Congress that will work in their interest.

84040460407

May 17, 1983

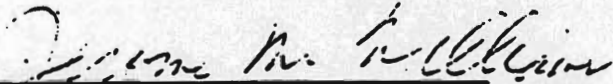
TO WHOM IT MAY CONCERN:

The name "Jerome W. Williams" is mentioned in the complaint before the Federal Election Commission, filed by the Washington Legal Foundation and naming the Congressional Black Caucus Political Action Committee and Congressmen Stokes and Clay, dated May 6, 1983.

It is stated that "Jerome W. Williams" signed where "William L. Clay" should have signed. This might well have been done in error since it was the first report done by this preparer. It was mistakenly brought to me with the intention that it be transmitted to Congressman William L. Clay by me. It is possible that it could have been signed in error as I was signing mail and other reports requiring my signature.

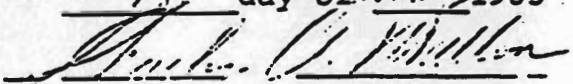
I do not serve, and did not serve at the time in question or at any other time as treasurer of the CBC-PAC.

Under penalty of perjury, the foregoing is true and correct based upon my personal knowledge, information and belief.

  
Jerome W. Williams  
1501 Hampshire Ct., Apartment No. 10  
Silver Spring, Maryland 20903

Given my hand and seal this

18 day of May 1983



Congressional Black Caucus  
Political Action Committee  
P.O. Box 2006  
Washington, D.C. 20024

May 16, 1983

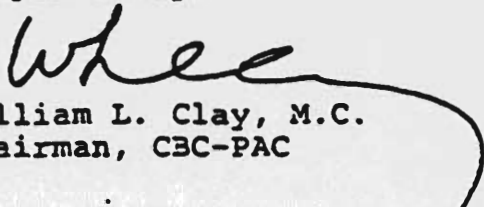
Mr. A. J. McKnight  
PO Box 3005  
Lafayette, Louisiana 70501

Dear Mr. McKnight:

The Congressional Black Caucus Political Action Committee's financial report on contributions is being reviewed by the Federal Election Commission.

I would appreciate it if you will fill out the information on the bottom of this letter and return it in the self-addressed stamped envelope enclosed.

Respectfully,

  
William L. Clay, M.C.  
Chairman, CBC-PAC

To Whom it May Concern:

Please find below the information requested.

NAME \_\_\_\_\_  
Occupation \_\_\_\_\_  
Employer \_\_\_\_\_  
& \_\_\_\_\_  
address \_\_\_\_\_

\_\_\_\_\_  
Phone (if you wish)

\_\_\_\_\_  
Date

\_\_\_\_\_  
signature

Exhibit D

22

84040160409



Before The  
FEDERAL ELECTION COMMISSION  
UNITED STATES OF AMERICA

CONGRESSIONAL BLACK CAUCUS POLITICAL)  
ACTION COMMITTEE a/k/a CBC-PAC )

CONGRESSMAN LOUIS STOKES )

CONGRESSMAN WILLIAM L. CLAY )

Matter Under Review  
(MUR) No. 1550

RESPONSE TO COMPLAINT BY THE  
FUND FOR CONSERVATIVE MAJORITY

The Congressional Black Caucus Political Action Committee (hereinafter "CBC-PAC"), Congressman Louis Stokes and Congressman William L. Clay, by their attorneys, in response to the complaint filed herein, state as follows:

1. In paragraph 1, pages 1 and 2, the Fund For Conservative Majority complainant has alleged that the CBC-PAC failed to list the name of any connected organization or political committee in its Statement of Organization. In this regard, complainant contends that the Congressional Black Caucus is a connected organization of the CBC-PAC. Respondents emphatically deny this allegation.

The Congressional Black Caucus is a legislative service organization, comprised of the black members of the United States Congress. It is a grouping of members who pool resources to pursue a common legislative goal. Thus, the Congressional Black Caucus functions as an extension of the individual offices of the black members of Congress and as such, coordinates their efforts for reasons of efficiency and effectiveness.

8 4 0 4 0 4 6 0 4 1 1

The black members of Congress who comprise the Congressional Black Caucus pay dues or assessments from personal funds or from their allowances for official expenses to ensure a dependable resource to pay fluctuating administrative costs. The Congressional Black Caucus, as a matter of law, does not hold corporate status.

The CBC-PAC is the brainchild of several of the black members of Congress acting in their individual capacities. It is an independent political committee and does not and was never intended to be connected to the legislative service organization. A copy of the "talking" paper used in this regard is attached hereto as Exhibit A.

At its inception, various names had been considered for this contemplated independent political committee. It was finally decided to call it the Congressional Black Caucus Political Action Committee (or CBC-PAC, an acronym frequently used for brevity) because it was felt that such a name would have wide recognition and mass appeal.

Although the CBC-PAC utilizes the name and/or the clearly recognized acronym (CBC) used by the Congressional Black Caucus legislative service organization, it is not and was never intended to be a separate segregated fund established pursuant to 11 CFR 102.1(c). See original Statement of Organization, line 5(f) and amended statement. The Congressional Black Caucus did not provide the CBC-PAC with any "seed" money to fund its initial operations,

it did not provide staff, office space or any other such administrative support or supplies.

Respondents admit that some of the black members of Congress or their authorized political committees have contributed to the CBC-PAC, just as they or their political committees have also contributed to other political committees. However, there is no similar pattern of contributions which has been made by all of the black members of Congress to the CBC-PAC and further there has been no transfer of funds between the CBC-PAC and other committees which represents a substantial portion of the funds of either the transferor or transferee committees.

The following contributions were made to the CBC-PAC by the black members of Congress or by their authorized committees: D. C. Friends of Bill Clay (\$1,000); Louis Stokes for Congress Committee (\$1,000); Committee for Fauntroy (\$1,000); Julian C. Dixon Democrat for Congress (\$1,000 - loan); Crockett for Congress Committee (\$1,000 - loan); Bill Gray for Congress Committee (\$1,000); Dymally for Congress Committee (\$1,000); Leland for Congress (\$1,000); Parren Mitchell Campaign for Congress (\$1,000).

The fact that these contributions were made by the political committees of the individual members does not in and of itself mean that their authorized committees are affiliated with the CBC-PAC, just as the authorized committees that contribute to other PAC's such as the National Congressional Club are not considered affiliated with the NCC-PAC.



8 4 0 4 0 1 6 0 4 1 3

The fact that some officers of the CBC-PAC are officers or members of other political committees does not necessarily constitute affiliation. See AO 1975-35, Fed. Elec. Camp. Fin. Guide (CCH) ¶5120 (Sept. 18, 1975) - indiv. may be officers of more than one political committee. See also MUR 961 (Apr. 21, 1981) where several board members of PAC A later became board members of PAC B, this factor alone was insufficient to show affiliation. In fact, several members of the Congressional Black Caucus also serve on the House Democratic Campaign Committee, including Congressman Clay, the chairman of the CBC-PAC. Obviously, the House Democratic Campaign Committee is not a connected committee of the CBC-PAC or vis versa.

It must be noted that neither the Congressional Black Caucus legislative service organization nor the authorized political committees of the individual Congressmen have the power, authority, or ability to hire, appoint, discipline, discharge, remove, or influence the decisions of the officers or members of the CBC-PAC. Such decisions are made by some of the black members of Congress in their individual capacities.

In light of the foregoing, respondents deny that they have violated the federal election laws by failing to disclose all the "connected organizations" as well as "affiliated committees" on the Statement of Organization in that there are no connected organizations or affiliated committees.

2. With respect to the allegations contained at paragraph 2, page 2 of the complaint, respondents CBC-PAC and Clay admit that

the required disclaimer notice was mistakenly not included. Congressman Stokes states that he has never signed nor authorized the mailing of any letters of solicitation and therefore has no knowledge with respect to whether such direct mail solicitations did or did not carry the required disclaimer. All future solicitations shall bear the necessary disclaimer required by law.

3. With respect to the allegations contained at paragraph 3, page 2 of the complaint, respondents CBC-PAC and Congressman Clay admit that the report was incorrectly and inadvertently signed by Jerome M. Williams. (See statement of Jerome Williams, attached as Exhibit B.) An amended report will be filed to properly reflect the signature of Congressman Clay, the treasurer of the CBC-PAC at that time. Congressman Louis Stokes lacks personal knowledge and information sufficient to form a belief as to the truth of said allegations.

4. With respect to the allegations contained at paragraph 4, page 2 of the complaint, an amended statement of organization has been filed with the FEC to reflect that Congressman Stokes held the position as treasurer. The failure to report said change is a minor technical violation which was the product of honest error and not conscious deception.

5. With respect to the allegations at page 2 of the complaint concerning a \$100 contribution received from the "Black Affairs Center, Inc.", respondents respectfully admit that said amount was accepted but that this acceptance was a matter of oversight. The

policy of the CBC-PAC is to return such prohibited contributions or in such cases where the donor cannot be located, to donate such contributions to charitable organizations. In view of the fact that the Black Affairs Center, Inc. could not be located, their \$100 contribution has been donated to a tax exempt organization. A copy of the cancelled check will be provided once it has been returned. Respondents deny that Bullock Washateria & Food Mart and Fabricare Center are incorporated entities. A \$50.00 contribution was accepted from the New Shiloh Baptist Church due to an honest mistake of fact. This amount has been returned to the contributor. A copy of the cancelled check will be supplied once it is returned. Contributions which have been received from churches (all \$100.00 or less) are being verified to insure compliance. A copy of the cancelled checks relative to all refunds will be supplied once returned. Respondents submit that such errors were honest mistakes in fact and not deliberate or reckless violations.

7. Respondents respectfully admit that a \$25.00 contribution was received from Bonner & Haitcock, M.D.'s Ltd. Acceptance of this contribution from an incorporated health group was due to a mistake of fact. In any event, this contribution has been refunded. A copy of the cancelled check shall be provided once it is returned. Respondents are still attempting to verify the legal status of the Black Nurses Association of GWA. The contributions received from sororities are from unincorporated affiliate chapters and as such,



may contribute to the CBC-PAC. All receipts are being re-examined to insure full compliance. Any improper contributions shall be refunded or donated to charity in cases where the donor cannot be located.

8. Respondents state that the Industrial Union Division - AFL-CIO is a union PAC and as such, contributions are properly acceptable.

9. With respect to the allegations contained at paragraph 6, page 2 of the complaint regarding the signature of Congressman Stokes, respondent Stokes states that one report was signed at his direction, by another individual in view of the fact that he was out of town. There was no intent to deceive. In any event, an amended report filed with the FEC bears Congressman Stokes' actual signature, a copy of which is attached hereto as Exhibit C. The reports filed on December 1, 1982 and January 27, 1983 bear Congressman Stokes' signatures.

10. With respect to the allegations contained in paragraph 7, page 2 of the complaint, respondents deny any violation of the FEC laws in that the contributions, all of which were less than \$200.00, were reported as a lump sum pursuant to 2 USC §434 (b)(2)(A). There is no requirement that such contributions be itemized.

CONCLUSION

While respondents have admitted certain technical violations, and although respondents do not condone violations of the letter of the law, respondents contend that the alleged violations are de minimis, were the result of honest error and not conscious deception, and have been substantially cured. Accordingly, respondents respectfully request that no further action be taken against any of them.

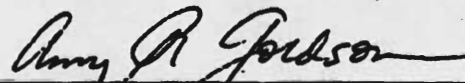
Respectfully submitted,

The Congressional Black Caucus  
Political Action Committee

Congressman Louis Stokes


Congressman William Clay

By:



AMY ROBERTSON GOLDSON  
4015 28th Place, N.W.  
Washington, D.C. 20008  
(202) 966-7531

By:



VICTOR STERLING  
725 Eighth Street, S.E.  
Washington, D.C. 20003

Dated: May 26, 1983

Attorneys For Respondents

84040160417

**CONGRESSIONAL BLACK  
POLITICAL ACTION COMMITTEE**

The United States Congress decides the economic, social and political direction of America. The U.S. Congress will decide how over seven (7) trillion dollars will be spent in the decade of the eighties. The decisions of the U.S. Congress have a direct impact on how 220 million people in this country will live.

The decisions made by the U.S. Congress have even greater impact on more than 26 million Black Americans and some additional 40 million other Americans who live below the officially established poverty line.

The Black members of Congress have been the only consistent voice in the U.S. Congress for the interest of Black people and the truly needy.

There are 435 seats in the House of Representatives. There are 100 seats in the U.S. Senate.

There are 26 million Black people in the United States. If Black people had seats in the U.S. Senate equal to the Black population there would be 11 Black senators. If Black people held seats in the House of Representatives equal to the Black population there would be 48 Black congress persons. Today there are only 18 Black members in the House of Representatives and no Black members of the Senate.

The lack of Black numerical strength in the U.S. Congress has caused Black and poor people to suffer irreparable damage as a direction is being taken in the U.S. Congress away from the poor and needy.

The present Black members of Congress stand together to resist this movement away from the poor and needy by forming "The Congressional Black Political Action Committee."

The Congressional Black Political Action Committee's Board of Directors will be the Black members of Congress.

The Congressional Black Political Action Committee exists for the following purposes.



. To advocate the interest of Black and poor people in the nation so as to impact legislation on their behalf in the U.S. Congress.

. To raise money for and work <sup>for</sup> Black candidates to Congress so as to increase the number of seats held by Black members of Congress.

. To form a National network in the more than 110 congressional districts where Black people are more than 15% of the population, for the purpose of holding the Representatives of those districts accountable on critical legislation that effects the interests of Black and poor people.

. To conduct educational seminars and forums in critical congressional districts so as to help Black and poor people in those districts elect members to Congress that will work in their interest.

84040460419

May 17, 1983

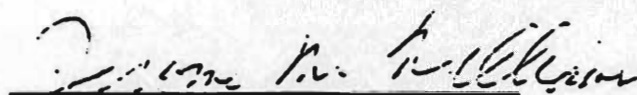
TO WHOM IT MAY CONCERN:

The name "Jerome W. Williams" is mentioned in the complaint before the Federal Election Commission; filed by the Washington Legal Foundation and naming the Congressional Black Caucus Political Action Committee and Congressmen Stokes and Clay, dated May 6, 1983.

It is stated that "Jerome W. Williams" signed where "William L. Clay" should have signed. This might well have been done in error since it was the first report done by this preparer. It was mistakenly brought to me with the intention that it be transmitted to Congressman William L. Clay by me. It is possible that it could have been signed in error as I was signing mail and other reports requiring my signature.

I do not serve, and did not serve at the time in question or at any other time as treasurer of the CBC-PAC.

Under penalty of perjury, the foregoing is true and correct based upon my personal knowledge, information and belief.

  
Jerome W. Williams  
1501 Hampshire Ct., Apartment No. 10  
Silver Spring, Maryland 20903

Given my hand and seal this

18 day of May 1983.



ALIGN AREA

ALIGN AREA

## 1. Name of Committee (In Full)

Congressional Black Caucus  
Political Action Committee

Address (Number and Street)

P. O. Box 2006

City, State and ZIP Code

Washington, D. C. 20013

☐ Check here if address is different than previously reported.

## 2. FEC Identification Number

097683

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 ☒ October 15 Quarterly Report☐ July 15 Quarterly Report ☐ January 31 Year End Report☐ July 31 Mid-Year Report (Non-Election Year Only)☐ Monthly Report for \_\_\_\_\_☐ Twelfth day report preceding \_\_\_\_\_ (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 7/1/82 through 9/30/826. (a) Cash on hand January 1, 19 82

(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 Line 6(d))

9. Debts and Obligations Owed TO The Committee

(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee

(Itemize all on Schedule C or Schedule D)

COLUMN A  
This PeriodCOLUMN B  
Calendar Year-to-Date

\$ 2991.11

\$ 13987.30

\$ 6435.36 \$ 29435.13

\$ 20422.66 \$ 32426.24

\$ 4353.86 \$ 16357.44

\$ 16068.80 \$ 16068.80

\$ 0

\$ 10000.00

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

Hon. Louis Stokes

Type or Print Name of Treasurer

SIGNATURE OF TREASURER

Date

5/26/83

For further information contact:

Federal Election Commission

Toll Free 800-424-9530

Local 202-523-4068

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)

Exhibit C

34



# Congressional Black Caucus

H2-344 House Annex #2

Washington, D.C. 20515

202 — 226-7790

May 26, 1983

Julian C. Dixon, Calif., Chairman  
Mickey Loland, Tx., 1st Vice-Chairman  
William H. Gray, III, Pa., 2nd Vice-Chairman  
Edolphus Towne, N.Y., Secretary  
Harold Washington, Ill., Treasurer

Augustus F. Hawkins, Calif.  
John Conyers, Jr., Mich.  
William L. Clay, Mo.  
Louis Stokes, Ohio  
Ronald V. Dellums, Calif.  
Walter E. Fauntroy, D.C.  
Parren J. Mitchell, Md.  
Charles B. Rangel, N.Y.  
Cardiss Collins, Ill.  
Harold E. Ford, Tenn.  
George W. Crockett, Jr., Mich.  
Mervyn M. Dymally, Calif.  
Gus Savage, Ill.  
Katie Hall, Ind.  
Major R. Owens, N.Y.  
Alan Wheat, Mo.

Lee Anderson, Esquire  
Federal Elections Commission  
1325 K Street, N. W.  
Washington, D. C. 20463

BY HAND

RE: MUR 1550

Dear Mr. Anderson:

In response to the complaint filed by the Fund for Conservative Majority, the Congressional Black Caucus has the following comments.

In the first numbered section contained on pages one and two, the Fund for Conservative Majority has alleged that the Congressional Black Caucus is a connected organization of the CBC-PAC. Respondents emphatically deny this allegation.

The Congressional Black Caucus, is a legislative service organization, comprised of the black members of the United States Congress. It is a grouping of members who pool resources to pursue a common legislative goal. Thus, the Congressional Black Caucus functions as an extension of the individual offices of the black members of Congress and as such, coordinates their efforts for reasons of efficiency and effectiveness.

The black members of Congress who comprise the Congressional Black Caucus pay dues or assessments from personal clerk hire funds or from their allowances for official expenses to ensure a dependable resource to pay fluctuating administrative costs. The Congressional Black Caucus as a matter of law, does not hold corporate status.

Attachment III ①

84040460422

MAY 26 1983

Lee Anderson, Esquire  
Page Two  
May 26, 1983

RE: MUR 1550

Upon information and belief, the CBC-PAC is an independent political committee which was established by some of the black Members of Congress in their individual capacities. The Congressional Black Caucus legislative service organization has never "connected" itself with the CBC-PAC. The name "Congressional Black Caucus" is neither patented nor is it registered as a tradename and technically, it can be used by anyone.

The Congressional Black Caucus did not establish the CBC-PAC and has not ever provided the CBC-PAC with any "seed" money to fund its initial operations. It did not and has not provided any staff, office space, the use of its offices, or any other administrative support of any kind to the CBC-PAC.

The Congressional Black Caucus legislative service organization recognizes that several of the black Members of Congress or their authorized political committees have contributed to the CBC-PAC, just as they have contributed to other political committees. However, there is neither a similar pattern of contributions nor any requirement that the black Members of Congress, all of whom are part of the Legislative Service Organization, must contribute to the CBC-PAC. No concerted action is taken by the black Members of Congress in their capacities as Members of the Congressional Black Caucus Legislative Service Organization, with respect to making political contributions or expenditures. Any decision to contribute to the CBC-PAC is a personal decision. Any decision to contribute to a candidate is a decision of some of the members of the CBC-PAC.

The fact that some, or even all of the Members of Congress who are bound together by a common ethnic heritage to form the Congressional Black Caucus Legislative Service Organization, also happen to be members of or contribute to the CBC-PAC, should not and does not make the Congressional Black Caucus Legislative Service Organization "connected" with the CBC-PAC. If all of these same black Members of Congress were members, or even officers or directors of, or contributors to another political committee such as the House Democratic Campaign Committee, no one would deem the Congressional Black Caucus to be a connected organization of that particular political committee. In this case, by virtue of the fact that there are so few black Members of the United States Congress, an attempt is made to connect all organizations in which they may participate.

Lee Anderson, Esquire  
Page Three  
May 26, 1983

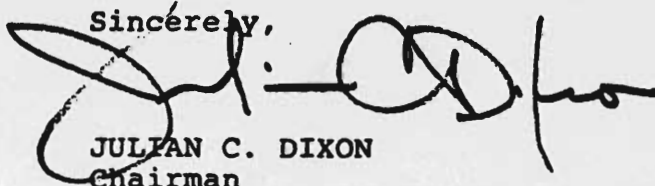
RE: MUR 1550

The Congressional Black Caucus legislative service organization does not have the power, authority, or ability to hire, appoint, discipline, discharge, remove, or influence the decisions of the officers or members of the CBC-PAC. The CBC-PAC functions entirely separately and apart from the Legislative Service Organization. It does not administratively or financially support the CBC-PAC in any manner.

In as much as the remaining allegations involve the CBC-PAC, no response shall be made by the Congressional Black Caucus.

In conclusion, the Congressional Black Caucus Legislative Service Organization maintains that it is neither a connected organization of the CBC-PAC nor has it violated any provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, it is respectfully urged that no further action be taken against the Congressional Black Caucus.

Sincerely,

A handwritten signature in black ink, appearing to read "Julian C. Dixon", is written over the typed name.

JULIAN C. DIXON  
Chairman

84040460424



AMY ROBERTSON GOLDSON  
ATTORNEY AT LAW

4015 28TH PLACE NORTHWEST  
WASHINGTON, D. C. 20008  
(202) 866-7831

June 8, 1983

Lee Anderson, Esquire  
Federal Election Commission  
1325 K Street, N.W. - 7th Floor  
Washington, D.C. 20463

RE: MUR 1550, 1551

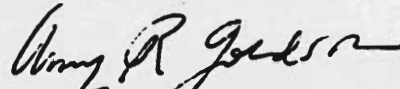
Dear Mr. Anderson:

On behalf of the respondents in the above matters, please find a listing of the officers of the Congressional Black Caucus legislative service organization, Congressional Black Caucus Political Action Committee and the Congressional Black Caucus Foundation, Inc. enclosed herein.

In response to your inquiry regarding Jerome Williams, please be advised that Mr. Williams is the treasurer of Hon. William Clay's authorized campaign committees. The CBC-PAC report of expenditures was inadvertently given to Mr. Williams along with Congressman Clay's authorized campaign committee reports. Mr. Williams has never served as treasurer of CBC-PAC. It was merely a mistake that he received and signed the CBC-PAC report.

I hope that the enclosed information sufficiently clarifies your concerns. Should you have any further questions or desire additional information, please do not hesitate to contact me.

Sincerely,



Amy Robertson Goldson

ARG:crw

Enclosures

cc: The Honorable William Clay

Attachment IV ①

84040460425

619 63:35

**Congressional Black Caucus legislative service organization**

**1981 and 1982 Officers:**

Hon. Walter E. Fauntroy, President  
Hon. William H. Gray, III, Vice President  
Hon. Harold Washington, Secretary  
Hon. Julian C. Dixon, Treasurer

**1983 Officers:**

Hon. Julian C. Dixon, Chairman  
Hon. Mickey Leland, 1st Vice President for Administration  
Hon. Bill Gray, 2nd Vice President for Administration  
Hon. Ed Towns, Secretary  
Hon. Harold Washington, Treasurer (now resigned)  
Hon. Cardiss Collins - was recently elected by the members  
to replace Hon. Harold Washington as Treasurer.

Ms. Harriet Pritchett is the Executive Director of the  
Congressional Black Caucus.

84040460426

Congressional Black Caucus Political Action Committee Officers:

1982

Hon. William Clay - Chairman  
Treasurer (resigned)  
Hon. Louis Stokes - Treasurer

1983

Hon. William Clay - Chairman  
Hon. Mervyn Dymally - Vice Chairman  
Hon. Louis Stokes - Treasurer (resigned)  
Hon. Cardiss Collins - Treasurer (resigned)  
Hon. Walter E. Fauntroy - Treasurer (5/23/83 - present)

CBC-PAC decisions are informally made by general consensus of William Clay and the active members of the CBC-PAC. The current active members are:

Hon. William Clay  
Hon. Cardiss Collins  
Hon. George W. Crockett, Jr.  
Hon. Mervyn M. Dymally  
Hon. Walter E. Fauntroy  
Hon. William Gray, III  
Hon. Mickey Leland  
Hon. Parren J. Mitchell  
Hon. Charles Rangel

Meetings are not held on a regular basis. Much of the business is conducted by telephone. It is important to note that the CBC-PAC has not been engaged in a significant amount of business thus far and as such, the CBC-PAC has not as yet defined by-laws or procedures formally.



Congressional Black Caucus Foundation, Inc. Officers

Hon. Louis Stokes - President  
Mr. A. L. Nellum - Vice President  
Nira Hardon Long, Esquire - Secretary/Treasurer

The Board of Directors of the Congressional Black Caucus Foundation, Inc. is composed of the following individuals:

Hon. Louis Stokes  
Albert L. Nellum  
Nira Hardon Long, P.C.  
Hon. William L. Clay  
Hon. Cardiss Collins  
Larry Doss  
Ofield Dukes  
Hon. Mervyn Dymally  
Hon. Walter E. Fauntroy  
Col. Ernest Frazier  
Dr. Bernard Gifford  
Hon. William H. Gray, III  
W. Mitchell Hines  
Joan Johnson  
Hon. Parren J. Mitchell  
Addison Barry Rand  
Alma Rangel  
Jay Stokes  
LeBaron Taylor  
Barbara Williams-Skinner

Ms. Francesta Farmer is the executive director of the CBCF.

84040460428



**FEDERAL ELECTION COMMISSION**

**WASHINGTON, D.C. 20463**

Amy Robertson Goldson  
Victor Sterling  
4015 28th Place, N.W.  
Washington, D.C. 20008

**Re: MURs 1550 and 1551**

**Dear Ms. Goldson and Mr. Sterling:**

The Federal Election Commission notified you on May 11, 1983, of two complaints which alleged that your clients, the Congressional Black Caucus Political Action Committee, ("CBCPAC") Congressman Louis Stokes and Congressman William L. Clay, violated certain provisions of the Federal Election Campaign Act of 1971, as amended (the "Act"). Copies of the complaints were forwarded to your clients at that time. We acknowledge receipt of your explanation of these matters dated May 26, 1983, and June 8, 1983.

Upon further review of the allegations contained in the complaint and information supplied by you, the Commission, on August , 1983, determined the following:

- (1) that there is reason to believe that CBCPAC and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 433(b)(2) by failing to report the name, address, relationship and type of its connected organization, the Congressional Black Caucus;
- (2) that there is reason to believe that the Congressional Black Caucus Political Action Committee and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 441b(b)(4) by soliciting contributions outside of the membership class of the Congressional Black Caucus;
- (3) that there is reason to believe that CBCPAC and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 441b(a) by accepting corporate contributions;
- (4) that there is reason to believe that CBCPAC and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 441d by failing to include a disclaimer stating the name of the person paying for the costs of a solicitation dated April 14, 1983;

## Attachment E

Amy Goldson and Victor Sterling  
Page 2

(5) that there is reason to believe that CBCPAC and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 433(a) by failing to file a timely Statement of Organization, but take no further action at this time;

(6) that there is reason to believe that CBCPAC and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 433(c) by failing to file a timely amendment to their Statement of Organization reflecting a change in treasurers, but take no further action at this time; and

(5) that there is reason to believe that CBCPAC and treasurers Congressman Clay and Congressman Stokes violated 2 U.S.C. § 432(g)(4) by failing to file reports with the Commission.

Your response to the Commission's initial notification of this complaint did not provide complete information regarding the matters in question. Please submit answers to the enclosed questions within ten (10) days of receipt of this letter. Statements should be submitted under oath.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause; however, in the absence of any information which demonstrates that no further action should be taken against CBCPAC and treasurers Congressman Clay and Congressman Stokes, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you have any questions, please contact Lee Andersen, the attorney assigned to this matter is (202) 523-5071.

Sincerely,

Enclosure  
Procedures

(2)



BEFORE THE FEDERAL ELECTION COMMISSION

REQUEST TO ANSWER QUESTIONS

TO: Amy Robertson Goldson and Victor Sterling      Re: MUR 1550-51  
4015 28th Place N.W.  
Washington, D.C. 20008

The Federal Election Commission (the "Commission") requests that the Congressional Black Caucus Political Action Committee ("CBCPAC") answer the questions that are listed below.

1. State the total amount of administrative costs incurred by CBCPAC from date of inception through May 1983, including, but not limited to: the costs of office supplies; desks; telephone; office equipment; and rent for office space. State whether any of CBCPAC's administrative costs were paid by the Congressional Black Caucus, Inc.
2. State the principal place of business and occupation of David E. Greene. State his relationship to CBCPAC? State the salary, if any, paid to Mr. Greene by CBCPAC for services rendered to CBCPAC.
3. State the names, addresses, and positions of all individuals who have performed services for CBCPAC attributable to administrative costs. Indicate for each individual whether he or she performed as a salaried employee, an independent contractor or a volunteer.

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4. State the names, addresses and phone numbers of the founder(s) of CBCPAC.
5. Identify all Members of Congress who have performed services for CBCPAC, including, but not limited to, the use of their names for solicitation purposes. Identify the nature of the services rendered.
6. State the time period that the Capitol Hill Hotel was used as a mail drop for CBCPAC. State the cost for the use of the Capitol Hill Hotel as a mail drop for the April 14, 1983 solicitation and for all other solicitations. Please state the approximate number of pieces of mail that were delivered to Suite 600, 200 C Street, S.E., Washington, D.C. 20003, addressed to CBCPAC. State whether the Congressional Black Caucus, Inc., ever used Suite 600, 200 C Street, S.E., Washington, D.C. 20003, for receipt of mail.

Please submit to the Commission responses to these questions along with any other information that the Congressional Black Caucus Political Action Committee may wish to provide within ten (10) days of your receipt of this letter.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Capitol Hill Hotel  
200 C Street, S.E.  
Washington, D.C. 20003

Re: MURs 1550 and 1551

Dear Sir/Madam:

On May 11, 1983, the Commission notified you of a complaint alleging that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended 2 U.S.C. § 431 et seq. (the "Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the the complaint, the Commission on August , 1983, determined that there is reason to believe that you have violated 2 U.S.C. § 441b(a), a provision of the Act. Specifically it appears that you made an in-kind contribution to the Congressional Black Caucus Political Action Committee in permitting the Committee to use the hotel as a mail drop.

As of this date, we have received no response from you in connection with this matter. The Office of General Counsel would like to settle this matter through conciliation prior to finding probable cause. However, in the absence of any information which demonstrates that no further action should be taken against you, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

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Capitol Hill Hotel  
Page 2

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

If you have any questions, contact R. Lee Andersen at (202)  
523-5071.

Sincerely,

Enclosure  
Procedures

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②



**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

Honorable Julian C. Dixon  
Congressional Black Caucus  
H2-344 House Annex #2  
Washington, D.C. 20515

Re: MURs 1550 and 1551

Dear Congressman Dixon:

On May 11, 1983, the Commission notified you of a complaint alleging that Congressional Black Caucus may have violated certain sections of the Federal Election Campaign Act of 1971, as amended. We acknowledge receipt of your explanation of these matters on May 26, 1983.

Upon further review of the allegations contained in the complaint and information provided by you, the Commission, on August , 1983, determined tht there is reason to believe that the Congressional Black Caucus Political Action Committee violated 2 U.S.C. § 433(b) (2) by failing to report the name, address and relationship of its connected organization, the Congressional Black Caucus.

You may submit any factual or legal materials which you beleive are relevant to the Commission's analysis of this matter. Please submit any such response within ten (10) days of your receipt of this notification.

The Office of General Counsel would like to settle this matter through conciliation prior to finding probable cause, however, in the absence of any information which demonstrates that no further action should be taken against the Congressional Black Caucus Political Action Committee, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

Honorable Julian C. Dixon  
Page 2

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you have any questions, please contact R. Lee Andersen, the attorney assigned to this matter, at (202) 523-5071.

Sincerely,

Enclosure  
Procedures

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U.S. Department of Justice

60047 337

GEMCD:NSS:pk  
186-017-16

83 JUN 15 P12:48

Washington, D.C. 20530

10 JUN 1983

83 JUN 15 P2:16

GENERAL COUNSEL

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

Dear Mr. Steele:

We recently received a complaint involving a possible violation of the disclaimer requirements of the Federal Election Campaign Act by an organization called the "CBC - Political Action Committee." A copy of this complaint is enclosed herein.

We do not believe this matter warrants criminal disposition, and we are accordingly referring it to the Commission for whatever action the FEC deems appropriate. We have advised the complainant, Louis Wm. Barnett of the "Citizens for the Republic" Committee, of our referral of this matter to you. (A copy of our response is also enclosed.)

Sincerely,

Gerald E. McDowell, Chief  
Public Integrity Section  
Criminal Division

By: *Nancy Stewart*  
NANCY S. STEWART, Attorney  
Public Integrity Section

Enclosures

84040460437

RONALD REAGAN  
Founder and Chairman Emeritus

Citizens Republic

*RC*  
*CD*  
*Stewart*  
*C*

LYN NOFZIGER  
Chairman

ARTHUR J. DELLINGER  
Treasurer

CURTIS MACK  
Executive Director

May <sup>27</sup> 28, 1983

Public Integrity Section  
Attn: Nancy Stewart  
Staff Attorney  
Criminal Division  
U. S. Department of Justice  
P. O. Box 50168  
F Street Station  
Washington, D. C. 20004

Dear Ms. Stewart:

Enclosed please find a letter which I received <sup>from Mack</sup> ~~last Friday~~  
from a group or organization called the "CBC - POLITICAL ACTION  
COMMITTEE."

I am bringing this letter to your attention due to the apparent  
us of the United States Seal on the carrier envelope and on the  
letterhead.

I believe that this is a violation of federal law and, possibly,  
of the Rules of the United States House of Representatives.

Further, there is no statement to the effect that the material  
was 'paid for by' anyone or any organization . . . an apparent  
violation of Federal Election Commission law or regulation.

Please advise me of the disposition of this matter.

Sincerely

*Louis Wm. Barnett*  
Louis Wm. Barnett  
Political Director

RECEIVED

JUN -2 1983

Public Integrity Section

Encl: (3)

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## CBC-POLITICAL ACTION COMMITTEE

Congressman William "Bill" Clay, Chairman  
 Congressman Mervyn M. Dymally, Vice-Chairman  
 Congressman Louis Stokes, Treasurer

April 14, 1983

### MEMBERS

Congressman William "Bill" Clay  
 Congresswoman Cardiss Collins  
 Congressman John Conyers  
 Congressman George W. Crockett, Jr.  
 Congressman Ronald V. Dellums  
 Congressman Julian C. Dixon  
 Congressman Mervyn M. Dymally  
 Congressman Walter E. Fauntroy  
 Congressman Harold E. Ford  
 Congressman William H. Gray III  
 Congresswoman Katie Hall  
 Congressman Augustus F. Hawkins  
 Congressman Mickey Leland  
 Congressman Parren J. Mitchell  
 Congressman Major A. Owens  
 Congressman Louis Stokes  
 Congressman Edolphus Towns  
 Congressman Harold Washington  
 Congressman Alan Wheat

Mr. Arthur J. Dellinger, Jr.  
 Suite 200 1253 7th Street  
 Santa Monica, CA 90401

Dear Mr. Dellinger, Jr.:

As a Political Action Committee (PAC) official, you should be aware that a major push is now underway to further control and limit the growth of political action committees as we know them. This move must not be taken lightly. The CBC-PAC is currently mounting a campaign designed to acquire support for allowing political action committees to continue to function in their current form, even though we may support some moderate adjustments over the medium and long term.

David E. Greene, Executive Director

Q HOW MAY YOU HELP? There are two (2) specific ways.

1 You have surely noticed that our PAC consists entirely of Congressmen. If you are willing to send me a strong letter of support for the continued existence of PACs as we now know them, your letter will definitely be channeled into influential Congressional hands sympathetic to the existing PAC philosophy.

C In addition, we are a multicandidate PAC and would appreciate a donation of \$5,000 as soon as possible. We perceive the threat to existing PACs as real even if misdirected and the need for funds to finance candidates who support our position in this matter is essential. If you are unable to send the full amount of \$5,000 at this time, send whatever you can as soon as possible. If, on the other hand, you are unable to send us a contribution now, please send the letter of support. We will use it.

Mr. Dellinger, Jr., the time has most certainly come upon us when PACs need to wield a unified sword from a position of political and economic strength.

I look forward to meeting you personally and discussing the issues pertinent to your particular membership at your earliest convenience.

Sincerely,

David Greene  
 Executive Director

Enclosure 4

Address: Suite 600, 200 C Street, S.E., Washington, D.C. 20003

We have no permanent enemies/We have no permanent friends/Only permanent interests.



84040460440



**CBC-POLITICAL ACTION COMMITTEE**

Suite 600, 200 C Street, S.E.  
Washington, D.C. 20003



Mr. Arthur J. Dellinger, Jr.  
Suite 200 1253 7th Street  
Santa Monica, CA 90401

**PACs, THE TAXPAYER, AND  
CAMPAIGN FINANCE REFORM**

Reproduced with permission from the author; Paul D. Kamenar, director of Litigation, Washington Legal Foundation. (Page one of nineteen.)

**Introduction**

When Walter Mondale formally announced on February 21, 1983, his candidacy for the Democratic nomination for the office of President of the United States, he promised that he would refuse to accept political action committee (PAC) contributions for his campaign. At the same time, he pledged his support for proposals that would extend government financing to all federal elections.

Similar positions taken by Senator Gary Hart and others seem to be the latest response to the steady drumbeat, by groups such as Common Cause and by the media throughout the 1983 elections, against PACs and their alleged pernicious effects on the electoral process. The claim is that corporate, trade association, and other "special interest" PACs allegedly "buy" the votes of congressmen with contributions for their increasingly expensive campaigns, and that this erodes the confidence of the public in their elected officials.

Special criticism is heaped against those PACs that engage in independent expenditures because such efforts allegedly exploit the "loopholes" in the election law's strict limits on campaign contributions and are made by groups that critics claim are unaccountable to the political system. The solution prescribed for these "problems" is to eliminate or sharply curtail PAC contributions and independent expenditures, and to substitute public financing for congressional and senatorial elections similar to that provided for presidential elections. These proposals introduced in the last Congress, are now being reintroduced in the 98th Congress. Hearings are held before the Senate Rules Committee in late January, and more are expected before that Committee and the House Administration Committee as well as later this spring.

The trouble is that the "reform" proposals largely ignore (1) that PACs

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Washington, D.C. 20530

Mr. Louis Wm. Barnett  
Political Director  
Citizens for the Republic  
1253 Seventh Street  
Suite 200  
Santa Monica, California 90401

Dear Mr. Barnett:

This is in response to your letter and enclosures of May 27, 1983, regarding a political solicitation you received from an entity called the "CBC - Political Action Committee" which bears on its stationery a likeness of the great seal of the United States. You question the appropriateness of such a use of the great seal.

Section 713 of Title 18 of the United States Code prohibits the knowing display of any likeness or facsimile of the great seal of the United States on stationery in a manner calculated to convey the false impression of sponsorship or approval by the United States Government.

In response to a previous complaint of a similar nature, we recently advised the Director of the CBC-PAC of the existence of the prohibition in 18 U.S.C. §713 and its applicability to that Committee's fundraising efforts. A copy of our letter in this regard is enclosed herein for your information.

You also state that the CBC-PAC solicitation may be in violation of the Federal Election Campaign Act of 1971, as amended (2 U.S.C. §431, et seq), in that it does not contain a statement as to who paid for the solicitation. To the extent that the CBC-PAC may have failed to include all the information required by the FECA, see 2 U.S.C. §441d, we have referred this matter to the Federal Election Commission, which has enforcement responsibility with respect to such matters. We trust that you will receive a reply from the Commission in this aspect of your complaint.

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Thank you for your interest and concern in  
referring this matter to us.

W. R. McDowell, Chief  
Public Integrity Section  
Criminal Division

By: *Nancy S. Stewart*  
NANCY S. STEWART, Attorney  
Public Integrity Section

Enclosure

84040460443

DEPARTMENT OF JUSTICE

WASHINGTON, D. C. 20530

OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE, \$300  
CRM/PIS

POSTAGE AND FEES PAID  
U. S. DEPARTMENT OF JUSTICE  
JUS-431



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

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**SENSITIVE**

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

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

**FIRST GENERAL COUNSEL'S REPORT**

83 JUN 16 P 3: 16

DATE AND TIME OF TRANSMITTAL

BY OGC TO THE COMMISSION 6/16/83  
3:10

MUR 1550 and 1551

STAFF MEMBER: R. Lee Andersen

SOURCE OF MUR's:

Robert C. Heckman, Fund for a Conservative  
Majority and Paul D. Kamenar, Washington  
Legal Foundation

RESPONDENT'S NAMES: Congressional Black Caucus, the Congress-  
sional Black Caucus Political Action  
Committee, Congressman Louis Stokes,  
Congressman William L. Clay and the  
Capitol Hill Hotel

INTERNAL REPORTS CHECKED: All on file

FEDERAL AGENCIES CHECKED: None

On May 6, 1983, complaints were filed against the  
Congressional Black Caucus, the Congressional Black Caucus  
Political Action Committee, Congressman Louis Stokes, Congressman  
William L. Clay, and the Capitol Hill Hotel. Two complaints,  
nearly identical in substance, were filed; one was filed by  
Robert C. Heckman of the Fund for a Conservative Majority (MUR  
1550) and the other by Paul D. Kamenar of the Washington Legal  
Foundation (MUR 1551).

We received extensive responses to the complaints on May 26,  
1983. On June 1, 1983, attorneys for respondents requested a  
meeting with staff of this Office. On June 6, 1983, the  
requested meeting was held, and on June 9, 1983, additional

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materials were filed by respondents as a result of questions that were raised during the June 6 discussions. The Office of General Counsel is now preparing a General Counsel's Report analyzing the numerous allegations in the complaints and the extensive responses filed thereto. We expect to transmit this report to the Commission promptly.

Charles N. Steele  
General Counsel

Jan 16, 1983  
Date

BY:

Kenneth A. Gross  
Associate General Counsel

84040460446

AMY ROBERTSON GOLDSON  
ATTORNEY AT LAW

4015 28TH PLACE NORTHWEST  
WASHINGTON, D. C. 20008  
(202) 966-7531

June 8, 1983

Lee Anderson, Esquire  
Federal Election Commission  
1325 K Street, N.W. - 7th Floor  
Washington, D.C. 20463

RE: MUR 1550, 1551

Dear Mr. Anderson:

On behalf of the respondents in the above matters, please find a listing of the officers of the Congressional Black Caucus legislative service organization, Congressional Black Caucus Political Action Committee and the Congressional Black Caucus Foundation, Inc. enclosed herein.

In response to your inquiry regarding Jerome Williams, please be advised that Mr. Williams is the treasurer of Hon. William Clay's authorized campaign committees. The CBC-PAC report of expenditures was inadvertently given to Mr. Williams along with Congressman Clay's authorized campaign committee reports. Mr. Williams has never served as treasurer of CBC-PAC. It was merely a mistake that he received and signed the CBC-PAC report.

I hope that the enclosed information sufficiently clarifies your concerns. Should you have any further questions or desire additional information, please do not hesitate to contact me.

Sincerely,

  
Amy Robertson Goldson

ARG:crw

Enclosures

cc: The Honorable William Clay

83 JUN 9 13:35

GENERAL COUNCIL

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6cc#307

**Congressional Black Caucus legislative service organization**

**1981 and 1982 Officers:**

Hon. Walter E. Fauntroy, President  
Hon. William H. Gray, III, Vice President  
Hon. Harold Washington, Secretary  
Hon. Julian C. Dixon, Treasurer

**1983 Officers:**

Hon. Julian C. Dixon, Chairman  
Hon. Mickey Leland, 1st Vice President for Administration  
Hon. Bill Gray, 2nd Vice President for Administration  
Hon. Ed Towns, Secretary  
Hon. Harold Washington, Treasurer (now resigned)  
Hon. Cardiss Collins - was recently elected by the members  
to replace Hon. Harold Washington as Treasurer.

Ms. Harriet Pritchett is the Executive Director of the  
Congressional Black Caucus.

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Congressional Black Caucus Political Action Committee Officers:

1982

Hon. William Clay - Chairman  
Treasurer (resigned)  
Hon. Louis Stokes - Treasurer

1983

Hon. William Clay - Chairman  
Hon. Mervyn Dymally - Vice Chairman  
Hon. Louis Stokes - Treasurer (resigned)  
Hon. Cardiss Collins - Treasurer (resigned)  
Hon. Walter E. Fauntroy - Treasurer (5/23/83 - present)

CBC-PAC decisions are informally made by general consensus of William Clay and the active members of the CBC-PAC. The current active members are:

Hon. William Clay  
Hon. Cardiss Collins  
Hon. George W. Crockett, Jr.  
Hon. Mervyn M. Dymally  
Hon. Walter E. Fauntroy  
Hon. William Gray, III  
Hon. Mickey Leland  
Hon. Parren J. Mitchell  
Hon. Charles Rangel

Meetings are not held on a regular basis. Much of the business is conducted by telephone. It is important to note that the CBC-PAC has not been engaged in a significant amount of business thus far and as such, the CBC-PAC has not as yet defined by-laws or procedures formally.

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Congressional Black Caucus Foundation, Inc. Officers

Hon. Louis Stokes - President  
Mr. A. L. Nellum - Vice President  
Nira Hardon Long, Esquire - Secretary/Treasurer

The Board of Directors of the Congressional Black Caucus Foundation, Inc. is composed of the following individuals:

Hon. Louis Stokes  
Albert L. Nellum  
Nira Hardon Long, P.C.  
Hon. William L. Clay  
Hon. Cardiss Collins  
Larry Doss  
Ofield Dukes  
Hon. Mervyn Dymally  
Hon. Walter E. Fauntroy  
Col. Ernest Frazier  
Dr. Bernard Gifford  
Hon. William H. Gray, III  
W. Mitchell Hines  
Joan Johnson  
Hon. Parren J. Mitchell  
Addison Barry Rand  
Alma Rangel  
Jay Stokes  
LeBaron Taylor  
Barbara Williams-Skinner

Ms. Francesta Farmer is the executive director of the CBCF.

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cc# 257

**AMY ROBERTSON GOLDSON**

ATTORNEY AT LAW

4015 28TH PLACE NORTHWEST  
WASHINGTON, D. C. 20008  
(202) 944-7531

May 26, 1983

83 MAY 26 PM 4:16

GENERAL COUNSEL

BY HAND

Lee Anderson, Esquire  
Federal Election Commission  
1325 K Street, N.W. - 7th Floor  
Washington, D.C. 20463

RE: MUR 1551 and 1550

Dear Mr. Anderson:

On behalf of the Congressional Black Caucus Political Action Committee, Congressman Louis Stokes and Congressman William Clay, submitted herewith is a response to the complaint filed by the Washington Legal Foundation and Fund For A Conservative Majority.

After you have had an opportunity to review the responses, we are hopeful that you will conclude that the Congressional Black Caucus Political Action Committee (CBC-PAC), Congressman Louis Stokes, and Congressman William Clay are in substantial compliance with the Federal Election Campaign Act of 1971, as amended. Accordingly, it is respectfully urged that no further action be taken against the respondents.

In those instances where a technical violation in preparing reports has occurred, those reports have been corrected by filing amended reports. In the situations which involve receipt of corporate contributions (average dollar amount: \$30, all such contributions were less than \$100) corrective action has been taken to return those contributions. Copies of cancelled refund checks will be filed with the Federal Election Commission once they are returned.

The CBC-PAC will endeavor to insure that all future solicitations contain the proper disclaimer.

The CBC-PAC has been in existence for approximately eighteen (18) months. While its short life neither relieves the CBC-PAC of the responsibility of compliance nor excuses the "de minimus" technical violations to which it has responded, immediate steps are underway to insure that such violations do not reoccur and that all future conduct conforms to the law.

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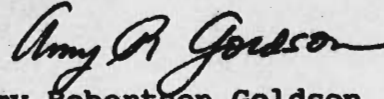
Lee Anderson, Esquire  
May 26, 1983  
Page 2

With respect to some of the allegations contained in the complaints, no provision of the Federal Election Campaign Act of 1971, as amended, covers the situation. Nor is there any provision of law within the jurisdiction of the FEC that relates to some of the allegations.

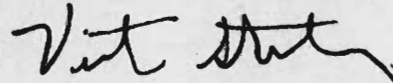
Victor Sterling, Esquire, my co-counsel in these cases, and I are available to discuss these matters with you at your earliest convenience.

In the event that you have any questions or comments relative to the enclosed, please do not hesitate to so advise.

Sincerely,



Amy Robertson Goldson



Victor Sterling

ARG:crw

Enclosures

cc: The Honorable Louis Stokes  
The Honorable William Clay

84040460452

AMY ROBERTSON GOLDSON

ATTORNEY AT LAW

4015 28TH PLACE NORTHWEST

WASHINGTON, D. C. 20008

Lee Anderson, Esquire  
Federal Election Commission  
1325 K Street, N.W. - 7th Floor  
Washington, D.C. 20463

BY HAND

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**STATEMENT OF DESIGNATION OF COUNSEL**

Re: MUR 1550-1551

**NAME OF COUNSEL:** Amy Robertson Goldson and Victor Sterling

**ADDRESS:** 4015 28th Place, N.W.  
Washington, D.C. 20008

**TELEPHONE:** (202) 966-7531

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.

5/25/83

Date

Signature

NAME:

ADDRESS:

HOME PHONE

BUSINESS PHONE:

84040460454



**STATEMENT OF DESIGNATION OF COUNSEL**

Re: MUR1551 and 1550

**NAME OF COUNSEL:** Amy Robertson Goldson and Victor Sterling

**ADDRESS:** 4015 28th Pl., NW  
Washington, D.C. 20008

**TELEPHONE:** (202) 966-7531

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.

5/12/83

Date

William L. Clay  
Signature Chairman, CBC-PAC

NAME:

ADDRESS:

HOME PHONE

BUSINESS PHONE:

84040460455

Before The  
FEDERAL ELECTION COMMISSION  
UNITED STATES OF AMERICA

CONGRESSIONAL BLACK CAUCUS POLITICAL)  
ACTION COMMITTEE a/k/a CBC-PAC )  
CONGRESSMAN LOUIS STOKES )  
CONGRESSMAN WILLIAM L. CLAY )

Matter Under Review  
(MUR) No. 1550

RESPONSE TO COMPLAINT BY THE  
FUND FOR CONSERVATIVE MAJORITY

The Congressional Black Caucus Political Action Committee (hereinafter "CBC-PAC"), Congressman Louis Stokes and Congressman William L. Clay, by their attorneys, in response to the complaint filed herein, state as follows:

1. In paragraph 1, pages 1 and 2, the Fund For Conservative Majority complainant has alleged that the CBC-PAC failed to list the name of any connected organization or political committee in its Statement of Organization. In this regard, complainant contends that the Congressional Black Caucus is a connected organization of the CBC-PAC. Respondents emphatically deny this allegation.

The Congressional Black Caucus is a legislative service organization, comprised of the black members of the United States Congress. It is a grouping of members who pool resources to pursue a common legislative goal. Thus, the Congressional Black Caucus functions as an extension of the individual offices of the black members of Congress and as such, coordinates their efforts for reasons of efficiency and effectiveness.

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The black members of Congress who comprise the Congressional Black Caucus pay dues or assessments from personal funds or from their allowances for official expenses to ensure a dependable resource to pay fluctuating administrative costs. The Congressional Black Caucus, as a matter of law, does not hold corporate status.

The CBC-PAC is the brainchild of several of the black members of Congress acting in their individual capacities. It is an independent political committee and does not and was never intended to be connected to the legislative service organization. A copy of the "talking" paper used in this regard is attached hereto as Exhibit A.

At its inception, various names had been considered for this contemplated independent political committee. It was finally decided to call it the Congressional Black Caucus Political Action Committee (or CBC-PAC, an acronym frequently used for brevity) because it was felt that such a name would have wide recognition and mass appeal.

Although the CBC-PAC utilizes the name and/or the clearly recognized acronym (CBC) used by the Congressional Black Caucus legislative service organization, it is not and was never intended to be a separate segregated fund established pursuant to 11 CFR 102.1(c). See original Statement of Organization, line 5(f) and amended statement. The Congressional Black Caucus did not provide the CBC-PAC with any "seed" money to fund its initial operations,



it did not provide staff, office space or any other such administrative support or supplies.

Respondents admit that some of the black members of Congress or their authorized political committees have contributed to the CBC-PAC, just as they or their political committees have also contributed to other political committees. However, there is no similar pattern of contributions which has been made by all of the black members of Congress to the CBC-PAC and further there has been no transfer of funds between the CBC-PAC and other committees which represents a substantial portion of the funds of either the transferor or transferee committees.

The following contributions were made to the CBC-PAC by the black members of Congress or by their authorized committees: D. C. Friends of Bill Clay (\$1,000); Louis Stokes for Congress Committee (\$1,000); Committee for Fauntroy (\$1,000); Julian C. Dixon Democrat for Congress (\$1,000 - loan); Crockett for Congress Committee (\$1,000 - loan); Bill Gray for Congress Committee (\$1,000); Dymally for Congress Committee (\$1,000); Leland for Congress (\$1,000); Parren Mitchell Campaign for Congress (\$1,000).

The fact that these contributions were made by the political committees of the individual members does not in and of itself mean that their authorized committees are affiliated with the CBC-PAC, just as the authorized committees that contribute to other PAC's such as the National Congressional Club are not considered affiliated with the NCC-PAC.

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The fact that some officers of the CBC-PAC are officers or members of other political committees does not necessarily constitute affiliation. See AO 1975-35, Fed. Elec. Camp. Fin. Guide (CCH) ¶5120 (Sept. 18, 1975) - indiv. may be officers of more than one political committee. See also MUR 961 (Apr. 21, 1981) where several board members of PAC A later became board members of PAC B, this factor alone was insufficient to show affiliation. In fact, several members of the Congressional Black Caucus also serve on the House Democratic Campaign Committee, including Congressman Clay, the chairman of the CBC-PAC. Obviously, the House Democratic Campaign Committee is not a connected committee of the CBC-PAC or vis versa.

It must be noted that neither the Congressional Black Caucus legislative service organization nor the authorized political committees of the individual Congressmen have the power, authority, or ability to hire, appoint, discipline, discharge, remove, or influence the decisions of the officers or members of the CBC-PAC. Such decisions are made by some of the black members of Congress in their individual capacities.

In light of the foregoing, respondents deny that they have violated the federal election laws by failing to disclose all the "connected organizations" as well as "affiliated committees" on the Statement of Organization in that there are no connected organizations or affiliated committees.

2. With respect to the allegations contained at paragraph 2, page 2 of the complaint, respondents CBC-PAC and Clay admit that

the required disclaimer notice was mistakenly not included.

Congressman Stokes states that he has never signed nor authorized the mailing of any letters of solicitation and therefore has no knowledge with respect to whether such direct mail solicitations did or did not carry the required disclaimer. All future solicitations shall bear the necessary disclaimer required by law.

3. With respect to the allegations contained at paragraph 3, page 2 of the complaint, respondents CBC-PAC and Congressman Clay admit that the report was incorrectly and inadvertently signed by Jerome M. Williams. (See statement of Jerome Williams, attached as Exhibit B.) An amended report will be filed to properly reflect the signature of Congressman Clay, the treasurer of the CBC-PAC at that time. Congressman Louis Stokes lacks personal knowledge and information sufficient to form a belief as to the truth of said allegations.

4. With respect to the allegations contained at paragraph 4, page 2 of the complaint, an amended statement of organization has been filed with the FEC to reflect that Congressman Stokes held the position as treasurer. The failure to report said change is a minor technical violation which was the product of honest error and not conscious deception.

5. With respect to the allegations at page 2 of the complaint concerning a \$100 contribution received from the "Black Affairs Center, Inc.", respondents respectfully admit that said amount was accepted but that this acceptance was a matter of oversight. The



policy of the CBC-PAC is to return such prohibited contributions or in such cases where the donor cannot be located, to donate such contributions to charitable organizations. In view of the fact that the Black Affairs Center, Inc. could not be located, their \$100 contribution has been donated to a tax exempt organization. A copy of the cancelled check will be provided once it has been returned. Respondents deny that Bullock Washateria & Food Mart and Fabricare Center are incorporated entities. A \$50.00 contribution was accepted from the New Shiloh Baptist Church due to an honest mistake of fact. This amount has been returned to the contributor. A copy of the cancelled check will be supplied once it is returned. Contributions which have been received from churches (all \$100.00 or less) are being verified to insure compliance. A copy of the cancelled checks relative to all refunds will be supplied once returned. Respondents submit that such errors were honest mistakes in fact and not deliberate or reckless violations.

7. Respondents respectfully admit that a \$25.00 contribution was received from Bonner & Haitcock, M.D.'s Ltd. Acceptance of this contribution from an incorporated health group was due to a mistake of fact. In any event, this contribution has been refunded. A copy of the cancelled check shall be provided once it is returned. Respondents are still attempting to verify the legal status of the Black Nurses Association of GWA. The contributions received from sororities are from unincorporated affiliate chapters and as such,

may contribute to the CBC-PAC. All receipts are being re-examined to insure full compliance. Any improper contributions shall be refunded or donated to charity in cases where the donor cannot be located.

8. Respondents state that the Industrial Union Division - AFL-CIO is a union PAC and as such, contributions are properly acceptable.

9. With respect to the allegations contained at paragraph 6, page 2 of the complaint regarding the signature of Congressman Stokes, respondent Stokes states that one report was signed at his direction, by another individual in view of the fact that he was out of town. There was no intent to deceive. In any event, an amended report filed with the FEC bears Congressman Stokes' actual signature, a copy of which is attached hereto as Exhibit C. The reports filed on December 1, 1982 and January 27, 1983 bear Congressman Stokes' signatures.

10. With respect to the allegations contained in paragraph 7, page 2 of the complaint, respondents deny any violation of the FEC laws in that the contributions, all of which were less than \$200.00, were reported as a lump sum pursuant to 2 USC §434 (b)(2)(A). There is no requirement that such contributions be itemized.

CONCLUSION

While respondents have admitted certain technical violations, and although respondents do not condone violations of the letter of the law, respondents contend that the alleged violations are de minimis, were the result of honest error and not conscious deception, and have been substantially cured. Accordingly, respondents respectfully request that no further action be taken against any of them.

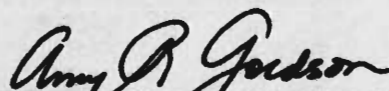
Respectfully submitted,

The Congressional Black Caucus  
Political Action Committee

Congressman Louis Stokes

Congressman William Clay

By:



AMY ROBERTSON GOLDSON  
4015 28th Place, N.W.  
Washington, D.C. 20008  
(202) 966-7531

By:



VICTOR STERLING  
725 Eighth Street, S.E.  
Washington, D.C. 20003  
(202) 546-8700

Dated: May 26, 1983

Attorneys For Respondents



CONGRESSIONAL BLACK  
POLITICAL ACTION COMMITTEE

The United States Congress decides the economic, social and political direction of America. The U.S. Congress will decide how over seven (7) trillion dollars will be spent in the decade of the eighties. The decisions of the U.S. Congress have a direct impact on how 220 million people in this country will live.

The decisions made by the U.S. Congress have even greater impact on more than 26 million Black Americans and some additional 40 million other Americans who live below the officially established poverty line.

The Black members of Congress have been the only consistent voice in the U.S. Congress for the interest of Black people and the truly needy.

There are 435 seats in the House of Representatives. There are 100 seats in the U.S. Senate.

There are 26 million Black people in the United States. If Black people had seats in the U.S. Senate equal to the Black population there would be 11 Black senators. If Black people held seats in the House of Representatives equal to the Black population there would be 48 Black congress persons. Today there are only 18 Black members in the House of Representatives and no Black members of the Senate.

The lack of Black numerical strength in the U.S. Congress has caused Black and poor people to suffer irreparable damage as a direction is being taken in the U.S. Congress away from the poor and needy.

The present Black members of Congress stand together to resist this movement away from the poor and needy by forming "The Congressional Black Political Action Committee."

The Congressional Black Political Action Committee's Board of Directors will be the Black members of Congress.

The Congressional Black Political Action Committee exists for the following purposes.

Congressional Black Political Action Committee

Page 2

. To advocate the interest of Black and poor people in the nation so as to impact legislation on their behalf in the U.S. Congress.

. To raise money for and work for Black candidates to Congress so as to increase the number of seats held by Black members of Congress.

. To form a National network in the more than 110 congressional districts where Black people are more than 15% of the population, for the purpose of holding the Representatives of those districts accountable on critical legislation that effects the interests of Black and poor people.

. To conduct educational seminars and forums in critical congressional districts so as to help Black and poor people in those districts elect members to Congress that will work in their interest.

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May 17, 1983

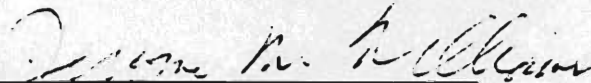
TO WHOM IT MAY CONCERN:

The name "Jerome W. Williams" is mentioned in the complaint before the Federal Election Commission, filed by the Washington Legal Foundation and naming the Congressional Black Caucus Political Action Committee and Congressmen Stokes and Clay, dated May 6, 1983.

It is stated that "Jerome W. Williams" signed where "William L. Clay" should have signed. This might well have been done in error since it was the first report done by this preparer. It was mistakenly brought to me with the intention that it be transmitted to Congressman William L. Clay by me. It is possible that it could have been signed in error as I was signing mail and other reports requiring my signature.


I do not serve, and did not serve at the time in question or at any other time as treasurer of the CBC-PAC.

Under penalty of perjury, the foregoing is true and correct based upon my personal knowledge, information and belief.

  
Jerome W. Williams  
1501 Hampshire Ct., Apartment No. 10  
Silver Spring, Maryland 20903

Given my hand and seal this

18 day of May 1983





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

(Summary Page)

ALIGN AREA

ALIGN AREA

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

**Congressional Black Caucus  
Political Action Committee**

**Address (Number and Street)**

**P. O. Box 2006**

**City, State and ZIP Code**

**Washington, D. C. 20013**

☐ Check here if address is different than previously reported.

**2. FEC Identification Number**

**097683**

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 ☒ October 15 Quarterly Report

☐ July 15 Quarterly Report ☐ January 31 Year End Report

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

☐ Monthly Report for \_\_\_\_\_

☐ Twelfth day report preceding \_\_\_\_\_ (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 7/1/82 through 9/30/82

6. (a) Cash on hand January 1, 19 82

(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 Line 6(d))

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

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

**COLUMN A  
This Period**

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

\$ 2991.11

\$ 13987.30

\$ 6435.36 \$ 29435.13

\$ 20422.66 \$ 32426.24

\$ 4353.86 \$ 16357.44

\$ 16068.80 \$ 16068.80

\$ 0

\$ 10000.00

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

**Hon. Louis Stokes**

Type or Print Name of Treasurer

SIGNATURE OF TREASURER

Date

For further information contact:

Federal Election Commission

Toll Free 800-424-9530

Local 202-523-4068

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)

Exhibit C

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CCCA 257

# Congressional Black Caucus

H2-344 House Annex #2

Washington, D.C. 20515

202 — 225-7790

May 26, 1983

Julian C. Dixon, Calif., Chairman  
Mickey Leland, Tx., 1st Vice-Chairman  
William H. Gray, III, Pa., 2nd Vice-Chairman  
Edolphus Towns, N.Y., Secretary  
Harold Washington, Ill., Treasurer

Augustus F. Hawkins, Calif.  
John Conyers, Jr., Mich.  
William L. Clay, Mo.  
Louis Stokes, Ohio  
Ronald V. Dellums, Calif.  
Walter E. Fauntroy, D.C.  
Parren J. Mitchell, Md.  
Charles B. Rangel, N.Y.  
Cardiss Collins, Ill.  
Harold E. Ford, Tenn.  
George W. Crompton, Jr., Mich.  
Mervyn M. Dymally, Calif.  
Gus Savage, Ill.  
Katie Hall, Ind.  
Major R. Owens, N.Y.  
Alan Wheat, Mo.

Lee Anderson, Esquire  
Federal Elections Commission  
1325 K Street, N. W.  
Washington, D. C. 20463

BY HAND

RE: MUR 1550

Dear Mr. Anderson:

In response to the complaint filed by the Fund for Conservative Majority, the Congressional Black Caucus has the following comments.

In the first numbered section contained on pages one and two, the Fund for Conservative Majority has alleged that the Congressional Black Caucus is a connected organization of the CBC-PAC. Respondents emphatically deny this allegation.

The Congressional Black Caucus, is a legislative service organization, comprised of the black members of the United States Congress. It is a grouping of members who pool resources to pursue a common legislative goal. Thus, the Congressional Black Caucus functions as an extension of the individual offices of the black members of Congress and as such, coordinates their efforts for reasons of efficiency and effectiveness.

The black members of Congress who comprise the Congressional Black Caucus pay dues or assessments from personal clerk hire funds or from their allowances for official expenses to ensure a dependable resource to pay fluctuating administrative costs. The Congressional Black Caucus as a matter of law, does not hold corporate status.

3 MAY 26 P 2:10

GENERAL COUNCIL

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Lee Anderson, Esquire  
Page Two  
May 26, 1983

RE: MUR 1550

Upon information and belief, the CBC-PAC is an independent political committee which was established by some of the black Members of Congress in their individual capacities. The Congressional Black Caucus legislative service organization has never "connected" itself with the CBC-PAC. The name "Congressional Black Caucus" is neither patented nor is it registered as a tradename and technically, it can be used by anyone.

The Congressional Black Caucus did not establish the CBC-PAC and has not ever provided the CBC-PAC with any "seed" money to fund its initial operations. It did not and has not provided any staff, office space, the use of its offices, or any other administrative support of any kind to the CBC-PAC.

The Congressional Black Caucus legislative service organization recognizes that several of the black Members of Congress or their authorized political committees have contributed to the CBC-PAC, just as they have contributed to other political committees. However, there is neither a similar pattern of contributions nor any requirement that the black Members of Congress, all of whom are part of the Legislative Service Organization, must contribute to the CBC-PAC. No concerted action is taken by the black Members of Congress in their capacities as Members of the Congressional Black Caucus Legislative Service Organization, with respect to making political contributions or expenditures. Any decision to contribute to the CBC-PAC is a personal decision. Any decision to contribute to a candidate is a decision of some of the members of the CBC-PAC.

The fact that some, or even all of the Members of Congress who are bound together by a common ethnic heritage to form the Congressional Black Caucus Legislative Service Organization, also happen to be members of or contribute to the CBC-PAC, should not and does not make the Congressional Black Caucus Legislative Service Organization "connected" with the CBC-PAC. If all of these same black Members of Congress were members, or even officers or directors of, or contributors to another political committee such as the House Democratic Campaign Committee, no one would deem the Congressional Black Caucus to be a connected organization of that particular political committee. In this case, by virtue of the fact that there are so few black Members of the United States Congress, an attempt is made to connect all organizations in which they may participate.

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Lee Anderson, Esquire  
Page Three  
May 26, 1983

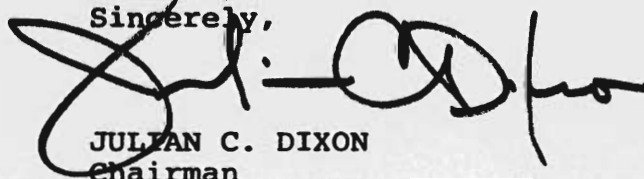
RE: MUR 1550

The Congressional Black Caucus legislative service organization does not have the power, authority, or ability to hire, appoint, discipline, discharge, remove, or influence the decisions of the officers or members of the CBC-PAC. The CBC-PAC functions entirely separately and apart from the Legislative Service Organization. It does not administratively or financially support the CBC-PAC in any manner.

In as much as the remaining allegations involve the CBC-PAC, no response shall be made by the Congressional Black Caucus.

In conclusion, the Congressional Black Caucus Legislative Service Organization maintains that it is neither a connected organization of the CBC-PAC nor has it violated any provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, it is respectfully urged that no further action be taken against the Congressional Black Caucus.

Sincerely,

A handwritten signature in black ink, appearing to read 'Julian C. Dixon', written over the printed name.

JULIAN C. DIXON  
Chairman

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7  
Congressional Black Caucus

H2-344 House Annex #2

Washington, D.C. 20515

Lee Anderson, Esquire  
Federal Elections Commission  
1325 K Street, N. W.  
Washington, D. C. 20463

HAND DELIVERED



Before The  
FEDERAL ELECTION COMMISSION  
UNITED STATES OF AMERICA

CONGRESSIONAL BLACK CAUCUS POLITICAL)  
ACTION COMMITTEE a/k/a CBC-PAC )

CONGRESSMAN LOUIS STOKES )

CONGRESSMAN WILLIAM L. CLAY )

Matter Under Review  
(MUR) No. 1551

RESPONSE TO COMPLAINT BY THE  
WASHINGTON LEGAL FOUNDATION

The Congressional Black Caucus Political Action Committee (hereinafter "CBC-PAC"), Congressman Louis Stokes and Congressman William L. Clay, by their attorneys, in response to the complaint filed herein, state as follows:

1. With respect to the allegations contained at paragraph 1, page 3, of the complaint, respondents state that a false address was not used. The address, Suite 600, 200 C Street, S.E., Washington, D.C. 20003, was merely a mailing address used in anticipation of receipts from a large solicitation.

The remaining allegations fail to state violations of any statute within the jurisdiction of the FEC but if a response is required, the remaining allegations are denied.

2. With respect to the allegations contained at paragraph 1(a), page 4 of the complaint, respondents admit that the solicitation did not identify who paid for the communication and whether it was authorized by any candidate or candidate's committee. The disclaimer was inadvertently not included. All future

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solicitations will contain the required disclaimer.

With respect to the allegations concerning Congressman Louis Stokes, Congressman Stokes states that the letter which he saw "before it went out" was only a draft and was not to be mailed as a final letter. He did not authorize the mailing of this letter nor did he have knowledge of its being mailed until after the fact. Therefore, Congressman Stokes would have no knowledge as to whether said letter did or did not contain the required disclaimer.

3. In response to the allegations contained at paragraph 1(b), page 4 of the complaint, respondents state that the official mailing address of the CBC-PAC for purposes of the FEC, has never changed and is still P. O. Box 2006, Washington, D.C. 20013. Respondents admit that said mailing address is a post office box located in the main post office.

Respondents admit that there is no payment for the rental of the post office box listed in the CBC-PAC's disclosure reports filed with the FEC prior to August 11, 1982. This omission was a matter of oversight. An amended report has been filed which reflects the payment by D. C. Friends of "Bill" Clay in the amount of \$22.00 for the cost of the box, a copy of which is attached hereto as Exhibit A. Congressman Stokes states that he had no prior knowledge of the payment of \$22.00 for the U. S. post office box, nor did he question the facts concerning the rental of the U. S. post office box.

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Respondents, CBC-PAC and Clay, deny that the CBC-PAC has received an in-kind contribution from the Capitol Hill Hotel in the form of using its premises at 200 C Street, S.E., Washington, D. C. The Capitol Hill Hotel agreed to accept the mail as part of a commercial business transaction in anticipation of the rental of office space by the CBC-PAC. Respondent, Congressman Stokes, states that he did not authorize any arrangement of any kind with the Capitol Hill Hotel, nor did he have any knowledge of the use of the Capitol Hill Hotel as a mailing address or for any other purpose.

In the event that the CBC-PAC obtains office space at the Capitol Hill Hotel, any such change in address will be reported to the FEC within 10 days pursuant to 2 U.S.C. §433(c). As previously indicated, the official address of the CBC-PAC still remains P. O. Box 2006, Washington, D.C. 20013. The purpose of using the Capitol Hill Hotel as a mailing address was merely in anticipation of receipts from a large solicitation.

4. With respect to the allegations contained at paragraph 2(a), page 6, respondents, CBC-PAC and Clay, admit that the Statement of Organization may have been filed a couple of days late. The Thanksgiving holiday weekend delayed its preparation and submission. Congressman Stokes lacks personal knowledge sufficient to form a belief as to the truth of this allegation.

5. In paragraph 2(a), page 6, complainant has alleged that the CBC-PAC failed to list the name of any connected organization or political committee in its Statement of Organization. In this



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regard, complainant contends that the Congressional Black Caucus is a connected organization of the CBC-PAC. Respondents emphatically deny this allegation.

The Congressional Black Caucus, is a legislative service organization, comprised of the black members of the United States Congress. It is a grouping of members who pool resources to pursue a common legislative goal. Thus, the Congressional Black Caucus functions as an extension of the individual offices of the black members of Congress and as such, coordinates their efforts for reasons of efficiency and effectiveness.

The black members of Congress who comprise the Congressional Black Caucus pay dues or assessments from personal funds or from their allowances for official expenses to ensure a dependable resource to pay fluctuating administrative costs. The Congressional Black Caucus, as a matter of law, does not hold corporate status.

The CBC-PAC is the brainchild of several of the black members of Congress acting in their individual capacities. It is an independent political committee and does not and was never intended to be connected to the legislative service organization. A copy of the "talking" paper used in this regard is attached hereto as Exhibit B.

At its inception, various names had been considered for this contemplated independent political committee. It was finally decided to call it the Congressional Black Caucus Political Action Committee (or CBC-PAC, an acronym frequently used for brevity)

because it was felt that such a name would have wide recognition and mass appeal.

Although the CBC-PAC utilizes the name and/or the clearly recognized acronym (CBC) used by the Congressional Black Caucus legislative service organization, it is not and was never intended to be a separate segregated fund established pursuant to 11 CFR 102.1(c). See original Statement of Organization, line 5(f) and amended statement. The Congressional Black Caucus did not provide the CBC-PAC with any "seed" money to fund its initial operations, it did not provide staff, office space or any other such administrative support or supplies.

Respondents admit that some of the black members of Congress or their authorized political committees have contributed to the CBC-PAC, just as they or their political committees have also contributed to other political committees. However, there is no similar pattern of contributions which has been made by all of the black members of Congress to the CBC-PAC and further there has been no transfer of funds between the CBC-PAC and other committees which represents a substantial portion of the funds of either the transferor or transferee committees.

The following contributions were made to the CBC-PAC by the black members of Congress or by their authorized committees: D.C. Friends of Bill Clay (\$1,000); Louis Stokes for Congress Committee (\$1,000); Committee for Fauntroy (\$1,000); Julian C. Dixon Democrat for Congress (\$1,000 - loan); Crockett for Congress Committee (\$1,000 - loan); Bill Gray for Congress Committee (\$1,000);

Dymally for Congress Committee (\$1,000); Leland for Congress (\$1,000); Parren Mitchell Campaign for Congress (\$1,000).

The fact that these contributions were made by the political committees of the individual members does not in and of itself mean that their authorized committees are affiliated with the CBC-PAC, just as the authorized committees that contribute to other PAC's such as the National Congressional Club are not considered affiliated with the NCC-PAC.

The fact that some officers of the CBC-PAC are officers or members of other political committees does not necessarily constitute affiliation. See AO 1975-35, Fed. Elec. Camp. Fin. Guide (CCH) ¶5120 (Sept. 18, 1975) - indiv. may be officers of more than one political committee. See also MUR 961 (Apr. 21, 1981) where several board members of PAC A later became board members of PAC B, this factor alone was insufficient to show affiliation. In fact, several members of the Congressional Black Caucus also serve on the House Democratic Campaign Committee, including Congressman Clay, the chairman of the CBC-PAC. Obviously, the House Democratic Campaign Committee is not a connected committee of the CBC-PAC or vis versa.

It must be noted that neither the Congressional Black Caucus legislative service organization nor the authorized political committees of the individual Congressmen have the power, authority, or ability to hire, appoint, discipline, discharge, remove or influence the decisions of the officers or members of the CBC-PAC.



Such decisions are made by some of the black members of Congress in their individual capacity.

Respondents further deny that the Congressional Black Caucus Foundation, Inc. (hereinafter referred to as CBCF) is another connected organization. The CBCF is a 501(c)(3) non-partisan corporation which was founded exclusively for charitable, scientific and educational purposes. Motivated by the extreme underrepresentation of blacks and other minorities on Capitol Hill legislative staffs, and recognizing the importance of training young blacks to participate more fully in all aspects of the legislative process, the CBCF's graduate legislative intern program was inaugurated. In addition, the CBCF's activities also include research and analyses of a non-partisan nature, but primarily focused on the problems which plague the black community.

The CBCF is controlled and operated by its Board of Directors. The members of the Board include some of the black members of Congress, businesspersons, lawyers, educators and scholars. While admittedly Congressman Louis Stokes was voted by the Board to serve as President and Chairman of the CBCF, and Congressman William Clay serves as a member of the Board of Directors, there is no indicia of control or any connectedness between the CBCF and the CBC-PAC. Pursuant to its by-laws, all CBCF policies and major operational decisions are collectively determined by a majority of the members of the Board of Directors of the CBCF. Of the twenty-one members of the Board of Directors of the CBCF, only eight persons are members of Congress.

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In light of the foregoing, respondents deny that they have violated the federal election laws by failing to disclose all the "connected organizations" as well as "affiliated committees" on the Statement of Organization in that there are no connected organizations or affiliated committees.

6. With respect to the allegations contained at paragraph 3(a), page 8 of the complaint, respondents, CBC-PAC and Congressman Clay admit that the report was incorrectly and inadvertently signed by Jerome M. Williams. (See statement of Jerome Williams, attached as Exhibit C.) An amended report will be filed to properly reflect the signature of Congressman Clay, the treasurer of the CBC-PAC at the time. Congressman Louis Stokes lacks personal knowledge sufficient to form a belief as to the truth of this allegation.

7. Respondents, CBC-PAC and Congressman Clay deny that the Congressional offices of Congressman William L. Clay were used to support the private endeavors of the CBC-PAC. The total number of hours expended on secretarial and bookkeeping for the entire thirteen (13) months (December, 1981 thru December, 1982) consisted of less than twenty (20) hours.

a. The five (5) reports which were filed with the Federal Election Commission consisted of thirty-two (32) pages of typing on printed forms. [Approximate time for typing each report was thirty (30) minutes. Approximate total time: 2 hours and 30 minutes.]

b. Tax forms for 1981 and 1982 consisted of one (1) page each. [Approximate time for typing was 15 minutes.]

Approximate total time: 30 minutes.]

c. Recording of approximately 600 mail contributions and depositing them in the bank was 5 hours. [Approximate total time: 5 hours.]

d. Writing of 45 checks approximately 1 hour. [Approximate total time: 1 hour.]

e. Miscellaneous correspondence estimate of 10 hours. [Approximate total time: 10 hours.]

f. Anise Jenkins was paid the sum of \$250.00 for bookkeeping services.

Congressman Louis Stokes lacks personal knowledge sufficient to form a belief as to the truth of this allegation.

CBC-PAC is administered as many political committees which have no need for elaborate offices, telephones, employees, typewriters. It is financed by funds solicited through the mail and that service is contracted out to firms that specialize in direct mail services. Those firms are paid to do the printing, addressing, mailing, etc. Respondent, Clay states that all secretarial work was performed during off duty hours at the homes of Anise Jenkins and Dr. Georgiana Land.

8. With respect to the allegations contained at paragraph 4, page 9 of the complaint, respondents, CBC-PAC and Congressman Clay admit that the second report, the April 15 Quarterly Report, was incorrectly filed with the Clerk of the House of Representatives, an ex officio commissioner of the FEC. Respondents will assure that this honest error, which was a matter of inadvertence, will

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not reoccur in the future. In any event, the second report was timely received by the FEC. Congressman Stokes lacks personal knowledge sufficient to form a belief as to the truth of this allegation in that he did not hold the office of treasurer.

9. With respect to the allegations contained at paragraph 5(a), page 10 of the complaint, concerning the July 15, 1982 Quarterly Report, respondents admit that the report was filed with the Clerk of the House, an ex officio commissioner of the FEC, rather than with the FEC. This was a matter of oversight, although the report was timely received by the FEC. Respondents will assure that this honest error will not reoccur in the future.

10. With respect to the allegations contained at paragraph 5(b), page 10 of the complaint, an amended statement of organization has been filed with the FEC to reflect that Congressman Stokes held the position as treasurer. The failure to report said change is a minor technical violation which was the product of honest error and not conscious deception.

11. With respect to the allegations contained at paragraph 5(c), page 10, concerning Congressman Stokes' signature, respondents state that the report bears the signature of Congressman Stokes.

12. Respondents admit that the name of the employer of and occupation of A. J. McKnight were not indicated, as alleged at paragraph 5(d), page 10 of the complaint. This information, which was not originally supplied by A. J. McKnight and as such, inadvertently omitted, has been requested and will be supplied upon receipt. A copy of this request is attached as Exhibit D.

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13. With respect to the allegations contained at paragraph 5(e), page 10 of the complaint concerning a \$100 contribution received from the "Black Affairs Center, Inc.", respondents respectfully admit that said amount was accepted but that this acceptance was a matter of oversight. The policy of the CBC-PAC is to return such prohibited contributions or in such cases where the donor cannot be located, to donate such contributions to charitable organizations. In view of the fact that the Black Affairs Center, Inc. could not be located, their \$100 contribution has been donated to a tax exempt organization. A copy of the cancelled check will be provided once it has been returned.

14. Respondents deny the allegations contained at paragraph 5(f), page 11 of the complaint. Industrial Union Division - AFL-CIO is a union PAC and as such, contributions are properly acceptable.

15. With respect to the allegations contained at paragraph 5(g), page 11 of the complaint, respondents deny that Bullock Washateria & Food Mart and Fabricare Center are incorporated entities. A \$50.00 contribution was accepted from the New Shiloh Baptist Church due to an honest mistake of fact. This amount has been returned to the contributor. A copy of the cancelled check will be supplied once it is returned. Contributions which have been received from churches (all \$100.00 or less) are being verified to insure compliance. A copy of the cancelled checks relative to all refunds will be supplied once returned. Respondents submit

that such errors were honest mistakes in fact and not deliberate or reckless violations.

16. Respondents deny the allegations contained at paragraph 5(h), page 11 of the complaint in that Ms. Georgiana Anderson-Land is an independent contractor and not a salaried employee. As such, CBC-PAC is not obligated to withhold federal and state taxes. In any event, no provision of the Federal Election Campaign Act, as amended, covers such a situation.

17. Respondents deny that the allegations contained at paragraph 5(i), page 12 constitute any violation. Mr. Ramage is a printer whose services are utilized by many authorized and unauthorized political committees. The fact that the printer is located in the Longworth House Office Building is irrelevant. Congressman Clay denies that he used his office to operate the CBC-PAC.

18. With respect to the allegations contained at paragraph 5(j), page 12 of the complaint, respondent Clay admits that the required disclaimer notice was mistakenly not included. Congressman Stokes states that he has never signed nor authorized the mailing of any letters of solicitation and therefore has no knowledge with respect to whether such direct mail solicitations did or did not carry the required disclaimer. All future solicitations shall bear the necessary disclaimer required by law.

19. With respect to the allegations contained at paragraph 6(a) and (b), page 12 of the complaint, respondents admit that the failure to file the report with the FEC was due to honest error. The report however was timely received by the FEC. This violation



shall not reoccur in the future. As to the signature of Congressman Stokes, respondent Stokes states that the report was signed at his direction, by another individual in view of the fact that Congressman Stokes was out of town. There was no intent to deceive. In any event, an amended report filed with the FEC bears Congressman Stokes' actual signature, a copy of which is attached hereto as Exhibit F.

20. With respect to the allegations contained at paragraph 6(c), page 12 of the complaint, respondents respectfully admit that a \$25.00 contribution was received from Bonner & Haitcock, M.D.'s Ltd. Acceptance of this contribution from an incorporated health group was due to a mistake of fact. In any event, this contribution has been refunded. A copy of the cancelled check shall be provided once it is returned. Respondents are still attempting to verify the legal status of the Black Nurses Association of GWA. The contributions received from sororities are from unincorporated affiliate chapters and as such, may contribute to the CBC-PAC. All receipts are being re-examined to insure full compliance. Any improper contributions shall be refunded or donated to charity in cases where the donor cannot be located.

21. Paragraph 6(d), page 13 alleges no violation. P.O. Box 2006 remains the current address of the CBC-PAC.

22. In response to the allegations contained at paragraph 7, page 13 of the complaint, respondents admit that the report was not filed with the FEC for the reasons as previously set forth. The report properly bears the signature of Congressman Stokes.

34040160486

The "Imhotep Fund" check was mailed to the CBC-PAC by Dr. Alfred Hayes, M.D., Los Angeles, CA. His secretary, Claudia Gay states that the contribution was from a political fund. Respondent denies any violation as inferred in paragraph 7(d). All expenditures which were paid (not incurred) were reported.

23. With respect to the allegations contained in paragraph 8(a), page 14 of the complaint, respondents deny any violation of the FEC laws in that the contributions, all of which were less than \$200.00, were reported as a lump sum pursuant to 2 USC §434 (b)(2)(A). There is no requirement that such contributions be itemized.

24. Respondents deny that any violation of the FEC laws has been alleged in paragraph 8(b), page 14 of the complaint. Although the report was sent in an official U. S. House of Representatives envelope, that envelope contained the proper postage. All expenses which were incurred have been reported.

The fact that Ms. Jenkins' business address in Congressman Clay's office is listed as her mailing address, does not support the inference that Congressman Clay used his official office for the operation of the CBC-PAC. It is not unusual for an individual to provide the address of their customary place of employment as a mailing address. The CBC-PAC collects 100% of its income by utilizing independent direct mail firms and has not needed offices, supplies and equipment.

CONCLUSION

While respondents have admitted certain technical violations, and although respondents do not condone violations of the letter of the law, respondents contend that the alleged violations are de minimis, were the result of honest error and not conscious deception, and have been substantially cured. Accordingly, respondents respectfully request that no further action be taken against any of them.

Respectfully submitted,

The Congressional Black Caucus  
Political Action Committee

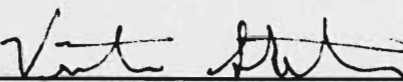
Congressman Louis Stokes

Congressman William Clay

By:

  
AMY ROBERTSON GOLDSON  
4015 28th Place, N.W.  
Washington, D.C. 20008  
(202) 966-7531

By:

  
VICTOR STERLING  
725 Eighth Street, S.E.  
Washington, D.C. 20003

Dated: May 26, 1983

Attorneys For Respondents

84040460487



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

(Summary Page)

ALIGN AREA

ALIGN AREA

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

**Congressional Black Caucus  
Political Action Committee**

**Address (Number and Street)**

**P. O. Box 2006**

**City, State and ZIP Code**

**Washington, D. C. 20013**

☐ Check here if address is different than previously reported.

**2. FEC Identification Number**

**097683**

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 ☒ October 15 Quarterly Report

☐ July 15 Quarterly Report ☐ January 31 Year End Report

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

☐ Monthly Report for \_\_\_\_\_

☐ Twelfth day report preceding \_\_\_\_\_ (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 7/1/82 through 9/30/82

6. (a) Cash on hand January 1, 19 82

(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 Line 6(d))

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

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

**COLUMN A  
This Period**

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

\$ 2991.11

\$ 13987.30

\$ 6435.36 \$ 29435.13

\$ 20422.66 \$ 32426.24

\$ 4353.86 \$ 16357.44

\$ 16068.80 \$ 16068.80

\$ 0

\$ 10000.00

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

**Hon. Louis Stokes**

Type or Print Name of Treasurer

SIGNATURE OF TREASURER

Date

5/26/83

For further information contact:

Federal Election Commission

Toll Free 800-424-9530

Local 202-523-4068

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)

Exhibit A

84040460488

**CONGRESSIONAL BLACK  
POLITICAL ACTION COMMITTEE**

The United States Congress decides the economic, social and political direction of America. The U.S. Congress will decide how over seven (7) trillion dollars will be spent in the decade of the eighties. The decisions of the U.S. Congress have a direct impact on how 220 million people in this country will live.

The decisions made by the U.S. Congress have even greater impact on more than 26 million Black Americans and some additional 40 million other Americans who live below the officially established poverty line.

The Black members of Congress have been the only consistent voice in the U.S. Congress for the interest of Black people and the truly needy.

There are 435 seats in the House of Representatives. There are 100 seats in the U.S. Senate.

There are 26 million Black people in the United States. If Black people had seats in the U.S. Senate equal to the Black population there would be 11 Black senators. If Black people held seats in the House of Representatives equal to the Black population there would be 48 Black congress persons. Today there are only 18 Black members in the House of Representatives and no Black members of the Senate.

The lack of Black numerical strength in the U.S. Congress has caused Black and poor people to suffer irreparable damage as a direction is being taken in the U.S. Congress away from the poor and needy.

The present Black members of Congress stand together to resist this movement away from the poor and needy by forming "The Congressional Black Political Action Committee."

The Congressional Black Political Action Committee's Board of Directors will be the Black members of Congress.

The Congressional Black Political Action Committee exists for the following purposes.

Congressional Black Political Action Committee  
Page 2

. To advocate the interest of Black and poor people in the nation so as to impact legislation on their behalf in the U.S. Congress.

. To raise money for and work for Black candidates to Congress so as to increase the number of seats held by Black members of Congress.

. To form a National network in the more than 110 congressional districts where Black people are more than 15% of the population, for the purpose of holding the Representatives of those districts accountable on critical legislation that effects the interests of Black and poor people.

. To conduct educational seminars and forums in critical congressional districts so as to help Black and poor people in those districts elect members to Congress that will work in their interest.

84040460490



May 17, 1983

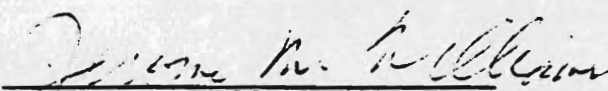
TO WHOM IT MAY CONCERN:

The name "Jerome W. Williams" is mentioned in the complaint before the Federal Election Commission, filed by the Washington Legal Foundation and naming the Congressional Black Caucus Political Action Committee and Congressmen Stokes and Clay, dated May 6, 1983.

It is stated that "Jerome W. Williams" signed where "William L. Clay" should have signed. This might well have been done in error since it was the first report done by this preparer. It was mistakenly brought to me with the intention that it be transmitted to Congressman William L. Clay by me. It is possible that it could have been signed in error as I was signing mail and other reports requiring my signature.

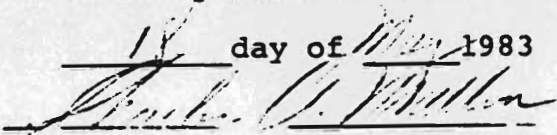
I do not serve, and did not serve at the time in question or at any other time as treasurer of the CBC-PAC.

Under penalty of perjury, the foregoing is true and correct based upon my personal knowledge, information and belief.

  
Jerome W. Williams  
1501 Hampshire Ct., Apartment No. 10  
Silver Spring, Maryland 20903

Given my hand and seal this

18 day of May 1983



Congressional Black Caucus  
Political Action Committee  
P.O. Box 2006  
Washington, D.C. 20024

May 16, 1983

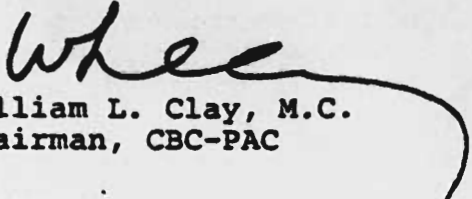
Mr. A. J. McKnight  
PO Box 3005  
Lafayette, Louisiana 70501

Dear Mr. McKnight:

The Congressional Black Caucus Political Action Committee's financial report on contributions is being reviewed by the Federal Election Commission.

I would appreciate it if you will fill out the information on the bottom of this letter and return it in the self-addressed stamped envelope enclosed.

Respectfully,

  
William L. Clay, M.C.  
Chairman, CBC-PAC

To Whom it May Concern:

Please find below the information requested.

NAME \_\_\_\_\_  
Occupation \_\_\_\_\_  
Employer \_\_\_\_\_  
& \_\_\_\_\_  
address \_\_\_\_\_

Phone (if you wish)

Date

signature

Exhibit D

84040460492

AMY ROBERTSON GOLDSON  
ATTORNEY AT LAW

4018 28TH PLACE NORTHWEST  
WASHINGTON, D. C. 20008  
(202) 966-7831

May 17, 1983

604# 68  
03 MAY 17 PM 2:37  
OFFICIAL COUNSEL

Lee Anderson, Esquire  
Federal Elections Commission  
1325 K Street, N.W. - 7th Floor  
Washington, D. C. 20463

BY HAND

RE: MUR No. 1550 and 1551

Dear Mr. Anderson:

I trust that you are in receipt of the designation of Amy R. Goldson, Esquire as the representative of the Congressional Black Caucus Political Action Committee in the above captioned matter.

Please be advised that Victor Sterling, Esquire, 725 8th Street, S.E., Washington, D.C. 20003, shall also be working for this office as co-counsel in connection with the above matter.

Should you have any questions regarding the foregoing, please so advise.

Sincerely,

  
Amy Robertson Goldson

ARG:crw

cc: The Honorable William Clay  
The Honorable Louis Stokes  
Victor Sterling, Esquire

84040460493



AMY ROBERTSON GOLDSON

ATTORNEY AT LAW

4015 28TH PLACE NORTHWEST

WASHINGTON, D. C. 20008

Lee Anderson, Esquire  
Federal Elections Commission  
1325 K Street, N.W. - 8th Floor  
Washington, D.C. 20463

BY HAND

600#66

83 MAY 16 AM: 54

STATEMENT OF DESIGNATION OF COUNSELRe: MUR1551NAME OF COUNSEL: Amy Robertson GoldsonADDRESS: 4015 28th Pl., NW  
Washington, D.C. 20008TELEPHONE: (202) 966-7531

13 MAY 16 P 3: 36

GENERAL COUNSEL

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.

5/12/83  
DateWilliam L. Llay  
Signature

NAME:

ADDRESS:

HOME PHONE

BUSINESS PHONE:

84040160495

600#67

STATEMENT OF DESIGNATION OF COUNSEL

Re: MUR 1550

NAME OF COUNSEL: Amy Robertson Goldson

ADDRESS: 4015 28th Pl., NW  
Washington, D.C. 20008

TELEPHONE: (202) 966-7531

13 MAY 16 P 3:37

GENERAL COUNSEL

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.

4-12-83  
Date

William L. Clay  
Signature

NAME:

ADDRESS:

HOME PHONE

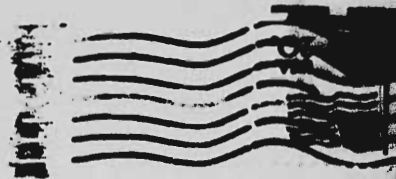
BUSINESS PHONE:

84040460496



8404016049

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



83 MAY 16 11:51

RECEIVED



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

August 15, 1983

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Honorable Walter E. Fauntroy  
2350 Rayburn House Office Building  
Washington, D.C. 20515

Re: MUR 1550/51

Dear Delegate Fauntroy:

This letter is to notify you that on May 6, 1983, the Federal Election Commission received two complaints which allege that your organization may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaints is enclosed. We have numbered these matters MUR 1550 & 1551. Please refer to these numbers in all future correspondence.

You were not previously notified as you were not treasurer of the Congressional Black Caucus Political Action Committee at the time the complaint was filed. Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your organization in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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

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

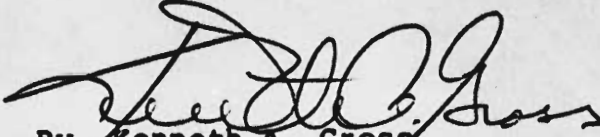
If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

84040160498

If you have any questions, please contact Lee Andersen, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele  
General Counsel

  
By Kenneth A. Gross  
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

84040460499





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

August 15, 1983

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Honorable Walter E. Fauntroy  
2350 Rayburn House Office Building  
Washington, D.C. 20515

Re: MUR 1550/51

Dear Delegate Fauntroy:

This letter is to notify you that on May 6, 1983, the Federal Election Commission received two complaints which allege that your organization may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaints is enclosed. We have numbered these matters MUR 1550 & 1551. Please refer to these numbers in all future correspondence.

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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.

34040160500

If you have any questions, please contact Lee Andersen, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele  
General Counsel

  
By Kenneth A. Gross  
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

84040460501



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

May 11, 1983

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Capitol Hill Hotel  
200 C Street, SE  
Washington, D.C. 20003

Re: MUR 1551

Dear Sir/Madam:

This letter is to notify you that on May 6, 1983, the Federal Election Commission received a complaint which alleges that your organization may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1551. Please refer to this number in all future correspondence.

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

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

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

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.

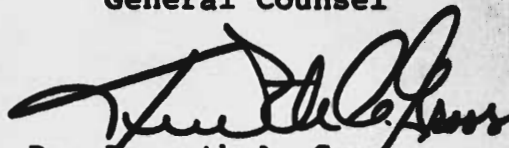
84040460502



If you have any questions, please contact Lee Andersen, the staff attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele  
General Counsel



By Kenneth A. Gross  
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

1551 5/1/83

SENDERS: Complete items 1, 2, 3, and 4.  
Add your address to the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one):

- ☐ Show to whom and date delivered \_\_\_\_\_
- ☐ Show to whom, date, and address of delivery \_\_\_\_\_

2. ☐ RESTRICTED DELIVERY  
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$ \_\_\_\_\_

3. ARTICLE ADDRESSED TO:  
Capitol Hill Hotel  
Washington, D.C. 20003

4. TYPE OF SERVICE:

- ☐ REGISTERED ☐ INSURED
- ☐ CERTIFIED ☐ COD
- ☐ REGISTERED MAIL

ARTICLE NUMBER  
943283

(Always obtain signature of addressee or agent)

I have received the article described above.


DATE OF DELIVERY  
5/12/83

6. ADDRESSEE'S ADDRESS (City, State, ZIP)

7. UNABLE TO DELIVER REASON:

8. EMPLOYEE'S INITIALS

RETURN RECEIPT, INSTRUCTIONS, AND CERTIFIED MAIL





**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

May 11, 1983

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Congressional Black Caucus  
H2-344 House Annex #2  
Washington, D.C. 20515

Re: MUR 1551

Dear Sir/Madam:

This letter is to notify you that on May 6, 1983, the Federal Election Commission received a complaint which alleges that your organization may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1551. Please refer to this number in all future correspondence.

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

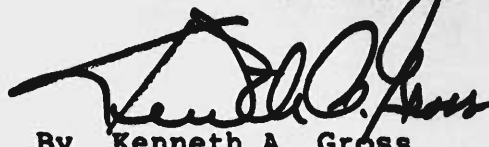
If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

84040460504

If you have any questions, please contact Lee Andersen, the staff attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele  
General Counsel



By Kenneth A. Gross  
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

1551 5/16

U.S. MAIL PERMIT NO. 100

● **SENDER:** Complete items 1, 2, 3, and 4.  
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one):

- ☐ Show to whom and date delivered \_\_\_\_\_
- ☐ Show to whom, date, and address of delivery \_\_\_\_\_
- ☐ **RESTRICTED DELIVERY**  
(The restricted delivery fee is charged in addition to the return receipt fee.) \_\_\_\_\_

TOTAL \$ \_\_\_\_\_

3. ARTICLE ADDRESSED TO:  
Cong. Brock Conner  
Washington, D.C. 20515

4. TYPE OF SERVICE:

- ☐ REGISTERED ☐ INSURED
- ☐ CERTIFIED ☐ COD
- ☐ RETURN MAIL

ARTICLE NUMBER  
H9CE46

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

NAME OF CLERK  
V. Boyd

6. ADDRESSEE'S ADDRESS (Only if not on label)

7. LABEL TO CLERK BECAUSE:

8. RETURN TO SENDER'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

60-18 91474

22-11 2 131222





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

May 11, 1983

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

**Congressional Black Caucus PAC**  
**P.O. Box 2006**  
**Washington, D.C. 20013**

**Re: MUR 1551**

Dear Sir/Madam:

This letter is to notify you that on May 6, 1983, the Federal Election Commission received a complaint which alleges that your organization may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1551. Please refer to this number in all future correspondence.

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

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

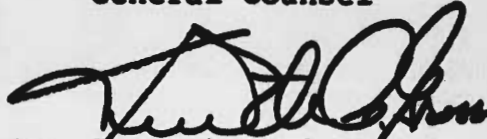
If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

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If you have any questions, please contact Lee Andersen, the staff attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele  
General Counsel



By Kenneth A. Gross  
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

1551 5/16

SENDER: Complete items 1, 2, 3, and 4.  
Add your address in the "RETURN TO" space  
ON REVERSE.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one):

- ☐ Show to whom and date delivered
- ☐ Show to whom, date, and address of delivery
- ☒ RESTRICTED DELIVERY  
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$

2. ARTICLE ADDRESSED TO:  
Cong. Black Caucus PAC  
Wash., D.C. 20013

4. TYPE OF SERVICE:

- ☐ REGISTERED ☐ INSURED
- ☒ CERTIFIED ☐ COD
- ☐ SIGNED (RAC)

ARTICLE NUMBER  
58CE46

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☒ Authorized agent

DATE OF DELIVERY

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER REASON:

WASHINGTON, DC  
MAY 1991

84040460507



**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

May 11, 1983

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Honorable William L. Clay  
2470 Rayburn House Office Building  
Washington, D.C. 20515

Re: MUR 1551

Dear Congressman Clay:

This letter is to notify you that on May 6, 1983, the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1551. Please refer to this number in all future correspondence.

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

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

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

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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**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

**May 11, 1983**

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

**Honorable Louis Stokes**  
**2465 Rayburn House Office Building**  
**Washington, D.C. 20515**

**Re: MUR 1551**

**Dear Congressman Stokes:**

This letter is to notify you that on May 6, 1983, the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1551. Please refer to this number in all future correspondence.

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

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

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

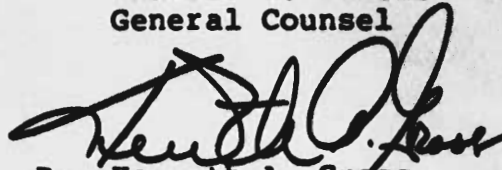
If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

84040160510

If you have any questions, please contact Lee Andersen, the staff attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele  
General Counsel



By Kenneth A. Gross  
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

1551 5/16

SENDER: Complete form 1, 2, 3, and 4.  
Add your address to the "RETURN TO" space on front.

(COMPLETE FOLLOWING FOR POST)

1. The following service is requested (check one):  
☐ Show to whom and date delivered  
☐ Show to whom, date, and address of delivery

2. ☐ RESTRICTED DELIVERY  
(The restricted delivery fee is charged in addition to the return receipt fee)

TOTAL \$

3. ARTICLE ADDRESSED TO:  
Cong States  
RHO  
Washington, D.C.

4. TYPE OF SERVICE:  
☐ REGISTERED ☐ INSURED  
☐ CERTIFIED ☐ COD  
☐ RETURN RECEIPT

ARTICLE NUMBER  
182516

(Signature of addressee or agent)  
I have received the article described above.  
SIGNATURE ☐ ADDRESS ☐ DELIVERY POINT

NAME OF DELIVERY  
K. Cohen

6. ADDRESSEE'S ADDRESS (City, State, Zip)  
0:10 91AYW8 83MAY16

7. UNABLE TO DELIVER: REASON:  
RECEIVED BY INSTRUCTIONS

8. EMPLOYEE'S INITIALS

RECEIVED BY INSTRUCTIONS





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

May 11, 1983

Paul D. Kamenar, Esquire  
Washington Legal Foundation  
1612 K Street, NW  
Suite 502  
Washington, D.C. 20006

Dear Mr. Kamenar:

This letter is to acknowledge receipt of your complaint which we received on May 6, 1983, against the Congressional Black Caucus PAC, Congressman Louis Stokes and Congressman William L. Clay which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this office. We suggest that this information be sworn to in the same manner as your original complaint. For your information, we have attached a brief description of the Commission's procedure for handling complaints. If you have any questions, please contact Steven Barndollar at (202) 523-4073.

Sincerely,

Charles N. Steele  
General Counsel

By Kenneth A. Gross  
Associate General Counsel

Enclosure

34040460512

GCC#9987

RECEIVED  
OFFICE OF THE  
GENERAL COUNSEL

Before The  
FEDERAL ELECTION COMMISSION  
UNITED STATES OF AMERICA

P4:48

|                                       |   |                     |
|---------------------------------------|---|---------------------|
| CONGRESSIONAL BLACK CAUCUS POLITICAL) | ) |                     |
| ACTION COMMITTEE a/k/a CBC-PAC        | ) |                     |
|                                       | ) | Matter Under Review |
| CONGRESSMAN LOUIS STOKES              | ) | (MUR) No. _____     |
|                                       | ) |                     |
| CONGRESSMAN WILLIAM L. CLAY           | ) |                     |

COMPLAINT BY THE WASHINGTON LEGAL FOUNDATION

Introduction

The Washington Legal Foundation, a nonprofit, public interest law firm, hereby files this complaint pursuant to 2 U.S.C. § 437g against the above-named respondents for repeated violations of the federal election laws 2 U.S.C. §§ 431, et. seq., and other federal laws regarding the operation of the Congressional Black Caucus Political Action Committee (CBC-PAC).

Under the federal election laws, the treasurer of each political committee is responsible for the proper accounting and reporting of receipts and disbursements. 2 U.S.C. § 434(a)(1). Accordingly, Congressman Louis Stokes, the current treasurer of CBC-PAC is named as a respondent. The former treasurer of CBC-PAC Congressman William L. Clay is also named as a respondent inasmuch as many FEC violations occurred during Congressman Clay's tenure as treasurer of CBC-PAC.

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SUITE 502  
WASHINGTON, D. C. 20006  
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MAY 6 1980  
COMMUNICATIONS SECTION

In essence, the Congressional Black Caucus has apparently formed this political action committee and is running that PAC out of the Congressional offices of Congressman William Clay, now Chairman of CBC-PAC. This is evident from an examination of the disclosure reports filed with the Federal Election Commission by CBC-PAC from December 3, 1981 through December 31, 1982. During that election year, CBC-PAC raised almost \$33,000 -- an amount greater than that raised by 72 per cent of all other PACs in 1982 -- yet its disclosure reports show NO expenditures for any office rent, office supplies and equipment, (xerox, typewriters, pens, etc.) or telephones. In addition, the year-end report shows a payment of \$250 to Anise Jenkins for bookkeeping and accounting services and lists her address as 2470 Rayburn HOB, which is the office of Congressman William Clay. Anise Jenkins identifies herself on correspondence she types and signs for CBC-PAC as its "FEC compliance officer." That 1982 year-end report was sent to the FEC in an official U.S. House of Representatives envelope from Congressman William Clay's office.

Because of the multitude of apparent violations of the election laws, WLF requests that the FEC should not only fully investigate and prosecute the respondents for these violations, but also that it conduct a full audit of the respondent committee under 2 U.S.C. § 438(b) to ensure that CBC-PAC is in full compliance with the election laws in all other respects.

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VIOLATIONS OF FEDERAL ELECTION LAWS

WLF will briefly list below the various violations of the federal election laws committed by the respondents.

1. On or about April 14, 1983, CBC-PAC sent out a fund-raising letter under the signature of David Greene, Executive Director. A copy of that letter is attached hereto as Exhibit 1. The ostensible purpose of raising funds was to combat the recent attack on PACs. The genuineness of that purpose is belied by the fact that several members of CBC are in fact supporting the curtailment of PACs, including co-sponsoring HR-2490, the Common Cause anti-PAC bill. Attached to that letter was an excerpt from a paper written by Paul D. Kamenar, Director of Litigation of the Washington Legal Foundation, in defense of PACs and against taxpayer financing of elections, erroneously indicating that he gave his permission to have his paper reproduced. Attached as Exhibit 2 is a Washington Post article of May 2, 1983 concerning this fund-raising letter. That article indicates that the listed address of CBC-PAC on the appeal, "Suite 600, 200 C Street, S.E., Washington, D.C. 20003", does not exist since there is no Suite 600 at that address. While the false address, false statement that the excerpt was reproduced with permission from the author, and the less than sincere appeal to counterattack the assault on PACs may violate laws other than the election laws (e.g., mail fraud, copyright, etc.), this practice of dissembling should be taken into account by the FEC when investigating the other FEC violations alleged herein, and the responses to the charges received by the respondents.

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(a) Respondents have violated 2 U.S.C. § 441d which requires solicitations by direct mail to identify explicitly who paid for the communication and whether it was authorized by any candidate or candidate's committee. The FEC has in the past prosecuted administratively and in court other persons for violating this provision. The April 14, solicitation letter has no disclaimer whatsoever. This violation is particularly egregious inasmuch as the CBC-PAC states that it is composed of certain members of Congress, many of whom are in fact candidates, and some of whom gave financial support from their campaigns to CBC-PAC. Thus, there are serious questions as to who in fact paid for and/or authorized this mailing, the answer to which is required by law to be disclosed on the face of the solicitation. This is clearly a knowing and willful violation of 2 U.S.C. § 441d since Respondent Congressman Louis Stokes admitted in the Washington Post article that he "saw it [the letter] before it went out." Accordingly, the Commission can assess fines and penalties of at least \$25,000 pursuant to 2 U.S.C. § 437g(d)(1)(A) against Congressman Stokes.

(b) Respondents have violated 2 U.S.C. § 441b prohibiting corporate contributions by receiving an in-kind contribution from the Capitol Hill Hotel in the form of using its premises at 200 C Street, S.E., Washington, D.C., as an office or mail drop. We note that the Statement of Organization filed by CBC-PAC on December 3, 1981, originally listed its address as

P. O. Box 2006, Washington, D.C. 20013. This is a post office box located in the main post office. However, in their first disclosure report filed with the FEC, there is no listing of any payment for the rental of the P. O. Box. The only expenditure listed is \$18.92 for the printing of checks. Payment for post office box rental does not show up in the disclosure reports until August 12, 1982 on CBC-PAC's October 15 Quarterly Report. Inasmuch as the Post Office requires payment at the time of the rental of the box, there is a question as to who paid for the box rental from December 3, 1981 to August 11, 1982, or whether the Post Office did not charge CBC-PAC for the rental. Thus, this failure to disclose all expenditures is an additional reporting violation of 2 U.S.C. § 434.

As late as March 16, 1983, CBC-PAC was still using stationery indicating its address as P. O. Box 2006. (See letter from Anise Jenkins to the FEC dated March 16, 1983) (Exhibit 9). However, the April 14, 1983 solicitation letter shows that the address is now "Suite 600, 200 C Street, S.E., Washington, D.C. 20003", the address of the Capitol Hill Hotel. Furthermore, the name of the PAC was changed from the "Congressional Black Caucus Political Action Committee" to simply "CBC-Political Action Committee." Under 2 U.S.C. § 433(e), any change in the address or name of the committee must be reported within 10 days of the change to the FEC pursuant to 2 U.S.C. § 433(c) in the form of filing an amended Statement of Organization which CBC-PAC has failed to do. Consequently, the respondents have clearly violated 2 U.S.C. § 433(c).

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STATEMENT OF ORGANIZATION

2. Pursuant to 2 U.S.C. § 433(a), a political committee must file a Statement of Organization within 10 days after becoming a political committee, and disclose therein pertinent information required by law. On December 3, 1981, Congressman William L. Clay as treasurer filed a Statement of Organization for the Congressional Black Caucus Political Action Committee. Exhibit 3. Respondents have violated the election law with this filing in two respects:

(a) The Statement of Organization was not timely filed. According to its first disclosure report, Congressman Louis Stokes campaign committee gave CBC-PAC \$1,000 on November 17, 1981, and Congressman Bill Clay's committee gave \$1,000 on November 18, 1981. Since the receipt of \$1,000 triggers the definition of "political committee" under 2 U.S.C. § 431(4)(A), the Statement of Organization should have been filed within 10 days, i.e., no later than November 27, 1981 as required by 2 U.S.C. § 433(a).

(b) Item 6 of the Statement of Organization should list the name of any connected organization and affiliated committee as required by 2 U.S.C. § 433(b)(2), but no organization or committee is listed. Complainant alleges on information and belief that the Congressional Black Caucus is indeed a connected organization of the Congressional Black Caucus Political Action Committee for the following reasons.

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In the first place, the name of the Congressional Black Caucus Political Action Committee evidently implies that its sponsorship is by the Congressional Black Caucus. Secondly, the stationery of the CBC-PAC as evidenced by the March 16, 1983 letter from Anise Jenkins of Congressman Clay's office to the FEC has printed on it a heading in the left margin "Congressional Black Caucus Members" with a listing of the names of the members. The April 14, 1983 solicitation letter on the different CBC-PAC stationery has the heading of "Members", presumably Members of CBC-PAC, but the list of Congressional members is virtually identical to the list of members of the Congressional Black Caucus on the March 6, 1983 letter.

In addition, many members of the Congressional Black Caucus have given direct financial support to CBC-PAC. Complainant does not know the exact legal status of the Congressional Black Caucus, i.e., whether it is incorporated or a membership organization. That legal status, however, will make a big difference as to what other FEC violations have been committed by the respondents, especially for violating the strict solicitation rules for membership organizations under 2 U.S.C. § 441b(b)(4)(c). Complainant also notes the existence of perhaps another connected organization, the Congressional Black Caucus Foundation, whose address is 3000 Connecticut Avenue, N.W., Suite 300, Washington, D.C. In addition, there may be "affiliated committees" that should also have been listed. The various Congressmen who gave the seed

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money to start CBC-PAC did so through their own principal campaign committee. Section 100.5(g) of the FEC regulations define "affiliated committees" as those "established, financed, maintained, or controlled" by the same persons or group of persons, which appears to be the case here.

Accordingly, the respondents have violated the federal election laws by failing to disclose all the "connected organizations" as well as "affiliated committees," on the Statement of Organization.

First Report: December 3-31, 1981

3. The first disclosure report filed by CBC-PAC was the year end report covering the period of December 3 through December 31, 1981 (Exhibit 4). There are several violations of the federal election laws by the respondents connected with this report.

(a) As required by 2 U.S.C. § 434(a)(1), the "treasurer shall sign each such [disclosure] report." However, it is clear that such was not the case. Congressman William L. Clay is listed as the treasurer on the report, but the report was signed instead by a Jerome M. Williams. If, on the other hand, Jerome M. Williams is in fact the treasurer, then respondents have violated 2 U.S.C. § 433(c) for not amending their Statement of Organization to reflect such fact.

(b) The only expenditure listed for the committee's first month of operation is \$18.92 for checks. On information and belief, complainant submits that other administrative

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expenses were incurred but not reported including post office box rental, postage, office supplies (typing, etc.), and the like. The absence of such expenditures is consistent, however, with complainant's charge that the Congressional offices of Congressman William L. Clay were used to support this private endeavor.

Second Report: January 1 - March 31, 1982

4. The second report filed by respondents, the April 15 Quarterly Report, also reveals violations of the election laws. Exhibit 4A. While this report appears to have been correctly signed by the treasurer, Congressman William L. Clay, it was not filed with the Federal Election Commission as required by law. 2 U.S.C. § 432; 11 C.F.R. § 105.4. According to the date and time stamp on the first page of the report, it states "Received, Office of Records & Registration, Office of the Clerk, U.S. House of Representatives." However, according to 2 U.S.C. § 432(g)(1), only those reports "by a candidate or by an authorized committee of a candidate" for the House of Representatives shall file its reports with the Clerk of the House. Copies are then sent to the Federal Election Commission. Multi-candidate political action committees, on the other hand, are required to file their reports directly with the FEC. Complainant notes, however, that it is possible that CBC-PAC may very well be "an authorized committee of a candidate", namely, those members of CBC who are also candidates. If that is true, then the filing of the

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**Third Report: April 1, 1982 - June 30, 1982**

(a) This report, like the previous one, was not filed with the Federal Election Commission as required but with the Clerk of the House.

(b) The name of the treasurer is listed as Congressman Louis Stokes instead of Congressman William Clay. This change of treasurers, whenever it occurred, was not reported to the FEC as required by 2 U.S.C. § 434(c).

(c) It is not clear that Congressman Stokes actually signed that report as required by law since his purported signature is noticeably different from his signature on the subsequent disclosure report (Exhibit 6).

(d) Schedule A of this report indicates a contribution of \$300 from "A. J. McKnight." However, the respondents failed to indicate the name of that person's employer or his occupation as required by 2 U.S.C. § 434(b)(3)(A).

(e) Respondents have violated 2 U.S.C. § 441b by soliciting and receiving illegal contributions from union and corporate entities. For example, page 2 of Schedule A, line B, lists a \$100 contribution from the "Black Affairs Center, Inc." That organization is incorporated and hence CBC-PAC may neither solicit nor receive contributions from them.

(f) Line E of page 2, Schedule A lists a contribution from the "Industrial Union Division - AFL-CIO" which is an illegal union contribution under 2 U.S.C. § 441b as opposed to a contribution by a union PAC.

(g) Schedule A, pages 3-4 also lists contributions from various entities which are likely to be incorporated such as the "Bullock Washateria & Food Mart", "Fabricare Center", the "New Shiloh Baptist Church", the "United Church of Christ" and several other churches. While such political contributions may violate the tax-exempt status IRS rules no doubt enjoyed by those religious organizations, they are likely to be incorporated entities and thus, for FEC purposes, are prohibited from making contributions to CBC-PAC.

(h) Complainant notes from Schedule B that CBC-PAC's only salaried employee appears to be a Ms. Georgiana Anderson-Land. However, there is no indication that Federal and State withholding taxes were paid by CBC-PAC as required by law.

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(i) Schedule B also indicates payment to David R. Ramage, Inc. for printing envelopes and calling cards. That printer is located in the Longworth House Office Building, a location near the offices of Congressman Clay and consistent with complainant's charges that his office is being used for the operation of CBC-PAC.

(j) CBC-PAC raised \$11,654.77 in unitemized contributions (less than \$200 per person), apparently as a result of a direct mail solicitation. Inasmuch as the April 14, 1983 solicitation letter failed to provide the disclaimer notice required by 2 U.S.C. § 441d, we submit that in all probability, the respondents failed to provide the required disclaimer notice in all of their direct mail solicitations.

Fourth Report: July 1 - Sept 30, 1982

6. Respondents have violated the election laws with respect to the October 15 Quarterly Report (Exhibit 6) in the following ways:

(a) Failure to file the report with the FEC.

(b) Failure of the treasurer Congressman Louis Stokes to sign the report (compare signature with prior report).

(c) Solicitation and receipt of illegal contributions from incorporated entities such as the "Black Nurses Association of GWA", several sororities, churches, and an incorporated "health group" of "Bonner & Haitcock, MD's LTD."

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(d) Schedule B shows for the first time payment to the Post Office of the box rental on August 12, 1982 despite CBC-PAC's use of such box since December 3, 1981. If this payment is for a different P. O. Box than P. O. Box 2006, then CBC-PAC is using yet another address without disclosing that to the FEC.

Fifth Report: October 1 - November 22, 1982

7. Respondents have violated the federal election laws as evidenced by their post-General Election report (Exhibit 7).

(a) The report was not filed with the FEC.

(b) The signature of the treasurer Congressman Louis Stokes is different from that of the prior report filed.

(c) A contribution was received from the "Inhotep Fund" which is likely to be an incorporated entity, and thus barred from making contributions, although the Summary Page has the \$100 contribution attributable to a political committee. However, there is no such political committee registered with the FEC, although it may be a state committee.

(d) No expenditures are listed for operating expenses which may violate the reporting requirements since such expenses no doubt were incurred.

Sixth Report: November 23 - December 31, 1982

8. The respondents have violated the election laws with respect to CBC-PAC Year End Report (Exhibit 8). While this report appears to have been correctly filed with the FEC rather than with the Clerk of the House, there are some reporting errors.

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(a) Line 11(d) of the Summary Page lists \$501 as "TOTAL Contributions" that period but there is no indication of the source of that money.


(b) Payment of \$250 was made to Anise Jenkins whose listed address is Congressman Clay's office. The report was sent in an official U.S. House of Representatives envelope from Congressman Clay's office. However, no other expenses show up for the operation of CBC-PAC. Such expenses, whether incurred by Congressman Clay's office or someone else, should have been disclosed but were not.

#### CONCLUSION

As is clearly evident, the respondents have committed dozens of violations of the election laws. One can only surmise how many more have been committed which are not apparent to the public, such as the detailed recordkeeping requirements of 2 U.S.C. § 432. In any event, the Commission has ample authority to prosecute the respondents and levy fines up to \$25,000 for each separate violation, 2 U.S.C. § 437g(d)(1) and may refer such violations to the Attorney General. 2 U.S.C. § 437g(a)(5)(C).

DATE: MAY 6, 1983

Respectfully submitted,

  
PAUL D. KAMENAR  
Director of Litigation

WASHINGTON LEGAL FOUNDATION  
1612 K Street, N.W. #502  
Washington, D.C. 20006  
(202) 857-0240

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1612 K STREET, N.W.  
SUITE 502  
WASHINGTON, D.C. 20006  
202-857-0240





## CBC-POLITICAL ACTION COMMITTEE

Congressman William "Bill" Clay, Chairman  
 Congressman Mervyn M. Dymally, Vice-Chairman  
 Congressman Louis Stokes, Treasurer

April 14, 1983

### MEMBERS

Congressman William "Bill" Clay  
 Congresswoman Cardiss Collins  
 Congressman John Conyers  
 Congressman George W. Crockett, Jr.  
 Congressman Ronald V. Dellums  
 Congressman Julian C. Dixon  
 Congressman Mervyn M. Dymally  
 Congressman Walter E. Fauntroy  
 Congressman Harold E. Ford  
 Congressman William H. Gray III  
 Congresswoman Katie Hall  
 Congressman Augustus F. Hawkins  
 Congressman Mickey Leland  
 Congressman Parren J. Mitchell  
 Congressman Major A. Owens  
 Congressman Louis Stokes  
 Congressman Edolphus Towns  
 Congressman Harold Washington  
 Congressman Alan Wheat

Mr. Robert Heckman  
 302 Fifth Street, N.E.  
 Washington, DC 20002

Dear Mr. Heckman:

As a Political Action Committee (PAC) official, you should be aware that a major push is now underway to further control and limit the growth of political action committees as we know them. This move must not be taken lightly. The CBC-PAC is currently mounting a campaign designed to acquire support for allowing political action committees to continue to function in their current form, even though we may support some moderate adjustments over the medium and long term.

HOW MAY YOU HELP? There are two (2) specific ways.

You have surely noticed that our PAC consists entirely of Congressmen. If you are willing to send me a strong letter of support for the continued existence of PACs as we now know them, your letter will definitely be channeled into influential Congressional hands sympathetic to the existing PAC philosophy.

In addition, we are a multicandidate PAC and would appreciate a donation of \$5,000 as soon as possible. We perceive the threat to existing PACs as real even if misdirected and the need for funds to finance candidates who support our position in this matter is essential. If you are unable to send the full amount of \$5,000 at this time, send whatever you can as soon as possible. If, on the other hand, you are unable to send us a contribution now, please send the letter of support. We will use it.

Mr. Heckman, the time has most certainly come upon us when PACs need to wield a unified sword from a position of political and economic strength.

I look forward to meeting you personally and discussing the issues pertinent to your particular membership at your earliest convenience.

Sincerely,

  
 David Greene  
 Executive Director

Enclosure 98

P.O. Box 2006  
 DC 20013

Address: Suite 600, 200 C Street, S.E., Washington, D.C. 20003

We have no permanent enemies. We have no permanent friends. Only permanent interests.

EXH. 1

8 4 0 4 0 4 6 0 5 8

PACs, THE TAXPAYER, AND  
CAMPAIGN FINANCE REFORM

Reproduced with permission from the author; Paul D. Kamenar, director of Litigation, Washington Legal Foundation. (Page one of nineteen.)

### Introduction

When Walter Mondale formally announced on February 21, 1983, his candidacy for the Democratic nomination for the office of President of the United States, he promised that he would refuse to accept political action committee (PAC) contributions for his campaign. At the same time, he pledged his support for proposals that would extend government financing to all federal elections.

Similar positions taken by Senator Gary Hart and others seem to be the latest response to the steady drumbeat, by groups such as Common Cause and by the media throughout the 1983 elections, against PACs and their alleged pernicious effects on the electoral process. The claim is that corporate, trade association, and other "special interest" PACs allegedly "buy" the votes of congressmen with contributions for their increasingly expensive campaigns, and that this erodes the confidence of the public in their elected officials.

Special criticism is heaped against those PACs that engage in independent expenditures because such efforts allegedly exploit the "loopholes" in the election law's strict limits on campaign contributions and are made by groups that critics claim are unaccountable to the political system. The solution prescribed for these "problems" is to eliminate or sharply curtail PAC contributions and independent expenditures, and to substitute public financing for congressional and senatorial elections similar to that provided for presidential elections. These proposals introduced in the last Congress, are now being reintroduced in the 98th Congress. Hearings are held before the Senate Rules Committee in late January, and more are expected before that Committee and the House Administration Committee as well as later this spring.

The trouble is that the "reform" proposals largely ignore (1) that PACs in fact play a relatively minor role in financing federal elections; (2) that the source of PAC money is many individuals who share common beliefs and voluntarily pool small contributions; (3) that PAC contributions are fully disclosed whether their elected leaders are voting in the constituents', or some "special," interest; (4) that the so-called loophole exploited by independent expenditures is nothing less than the First Amendment right of free speech and association; (5) that the great majority of the American public opposes taxpayer financing of elections; and (6) that more regulation will only increase the power of the Federal Election Commission, a bureaucracy that has consistently trampled upon basic rights and freedoms, the latest example of which, discussed briefly herein, are proposed FEC regulations sent to Congress for its consideration on March 1, 1983, which, if not vetoed, would seriously limit the rights of corporations and expand those of unions.

It might well be healthier for the electoral process and more in the public interest not to curtail PACs and private contributions. Instead, the political process should be opened further to encourage more direct citizen involvement in democracy's fundamental function: the selection of its leaders.

This enclosure is for information purposes only and its inclusion does not necessarily indicate an acceptance of the author's views by the CBC-PAC.

8 4 0 4 0 4 6 0 5 2 9

# Black Caucus Seen on Both Sides of PAC Bill

## Black Caucus Seen Favoring, Fighting Bill to Curb PACs

By George Lardner Jr.  
Washington Post Staff Writer

Three weeks ago today, Rep. David R. Obey (D-Wis.) and two colleagues announced renewal of their efforts to put a lid on the influence of political action committees and contributions they can make to House candidates.

Three days later, the Congressional Black Caucus-Political Action Committee sent a letter signed by its executive director, David Greene, to officials of other PACs. It warned that "a major push is now under way to further control and limit the growth of political action committees as we now know them."

"This move must not be taken lightly," the letter said. In it, Greene asked for "a strong letter of support for the continued existence of PACs as we now know them" and "a donation of \$5,000 as soon as possible" to help counter the threat.

The request has been criticized for several reasons, not the least of which is that several caucus members—including Rep. William L. Clay (D-Mo.), CBC-PAC chairman, and Rep. Louis Stokes (D-Ohio), CBC-PAC treasurer—have signed up as co-sponsors of the Obey bill.

The CBC-PAC letter's stationery, which includes the names of all 21 caucus members and the motto, "We have no permanent enemies/We have no permanent friends/Only See CAUCUS, A9, Col. 1

### CAUCUS, From A1

permanent interests," lists "Suite 600, 200 C St., S.E." as CBC-PAC's address.

There is no such office, and the building at 200 C St. S.E., which houses a new luxury hotel called the Capitol Hill, stops at the fifth floor. Jonathan Z. Rubin, the hotel's sales and marketing director, said he gave Greene the suite number to use as a mail "drop" in anticipation of his business. "He [Greene] came in about six weeks ago," Rubin said. "He's apparently starting up a PAC, and he needs an office on the Hill. He said a PAC can't be housed in a congressional building. . . . He said he's going to do business with me."

The hotel's suites cost \$2,100 to \$2,900 a month, more than the CBC-PAC usually took in during 1982, its first full year in business. Rubin said Greene told him a decision on whether the CBC-PAC would rent a suite "would be made by July." Meanwhile, Rubin said, he told Greene to use "Suite 600" for his mail.

Last Friday, as Greene was leaving Clay's office in the Rayburn House Office Building, he refused to say where the CBC-PAC, of which he said he is "full-time" executive director, has its headquarters.

Greene also refused to say whether he had received money as a result of the fund-raising appeal. To most questions, he responded, "No comment. Any information generated on that would have to come from the chairman."

Although the CBC-PAC letter appears to suggest opposition to Obey's "clean campaign act" and to ask for money on that basis, Greene said, "I don't read it that way." Asked how, as its signer, he did read it, he said, "Any comment on that would have to come from the chairman [Clay]."

Clay, formally added to the list of the Obey bill's co-sponsors April 18, could not be reached for comment despite repeated attempts to contact him.

However, Stokes said he "saw it [the letter] before it went out" and saw no inconsistency between it and Obey's bill, which he joined as a co-sponsor last Monday.

Stokes cited a segment of the letter that said: "The CBC-PAC is currently mounting a campaign designed to acquire support for allowing political action committees to continue to function, even though we

**Rep. Louis Stokes (D-Ohio) is co-sponsoring a bill to limit the influence of PACs, saying the black caucus is simultaneously promoting PACs "even though we may support some moderate adjustment."**



may support some moderate adjustments over the medium and long term."

Said Stokes: "I think that the letter, which was sent out by the executive director of the PAC, makes it clear that we support some form of change with reference to the PAC situation." As for Obey's bill, Stokes said, "I still support it."

Obey's bill, prepared with the self-designated citizens' lobby, Common Cause, would limit to \$50,000 the amount that a House candidate could accept from PACs in a two-year election period and establish partial public financing for congressional campaigns. A semi-monthly newsletter entitled "PACs & Lobbies" described it as an "anti-PAC bill."

In appealing for funds and support, the CBC-PAC letter told other PAC officials that "you have surely noticed that our PAC consists entirely of congressmen" and assured them that their letters of "support" "will definitely be channeled into influential congressional hands sympathetic to the existing PAC philosophy."

In seeking \$5,000 contributions, the letter added that "we are a multi-candidate PAC. . . . We perceive the threat to existing PACs as real even if misdirected and the need for funds to finance candidates who support our position in this matter is essential. . . . PACs need to wield a unified sword from a position of political and economic strength."

Asked how that squared with Obey's bill, Stokes said: "The Obey bill is not yet law. We don't know

whether it will become law or not. The [CBC] PAC is trying to exist under the current situation. . . ."

Asked if the letter is consistent with support for Obey's bill and what "threat" to the PACs was seen by the CBC-PAC, Stokes said, "I don't want to discuss it further. I've answered you the best I can."

Rep. Parren J. Mitchell (D-Md.), added to the list of Obey bill co-sponsors April 20, said he was not aware of the letter and said of Greene, "I don't even think I know him."

Formed in December, 1981, with a post office box for an address, the CBC-PAC notified the Federal Election Commission March 17 that it had qualified as a "multi-candidate committee"—meaning it had been in business for six months, received at least 50 individual contributions and contributed to at least five candidates for federal office.

The achievement, recorded about the time Greene reportedly inquired about a suite at the Capitol Hill, entitled the group for the first time to donate \$5,000, rather than \$1,000, to each candidate in an election.

Two caucus members, Reps. Ronald V. Dellums (D-Calif.) and John Conyers Jr. (D-Mich.), co-sponsored the Obey bill at the outset. They could not be reached for comment about the CBC-PAC letter, although aides to Dellums doubted he knew of Greene's fund-raising pitch.

Del. Walter E. Fauntroy (D-D.C.), a caucus member who is not a sponsor of Obey's bill, could not be reached for comment.

Robert C. Heckman, chairman of

the Fund for a Conservative Majority, received the letter and said he is particularly perplexed by the fact that some caucus members had endorsed Obey's "anti-PAC bill."

"It would be hard for me to conclude anything but the fact that you are trying to solicit money and support in a clearly fraudulent manner," Heckman wrote Greene last Wednesday. He said he intended to complain to the FEC.

Heckman took special exception to the observation in Greene's letter that the CBC-PAC consists entirely of congressmen. "In light of that fact," Heckman wrote, "I find your appeal that much more appalling."

Attached to the fund-raising appeal was a one-page excerpt from a defense of PACs written for the Heritage Foundation by Paul D. Kammerer, litigation director of the conservative Washington Legal Foundation. The CBC-PAC letter said the excerpt was "reproduced with permission from the author, Paul D. Kammerer." Kammerer said he gave no such permission and is demanding a retraction from Greene.

At the other end of the spectrum is Common Cause president Fred Wertheimer, who favors passage of Obey's bill but acknowledges that it faces "a very tough political fight."

"It shows how damaging this PAC system is and how crucial it is to change it," Wertheimer said of the CBC-PAC appeal. "The PAC system is a process that has become so destructive to the institution of the Congress that in some ways, the members themselves have the highest stakes in getting out from under the shadow it casts. . . ."

Despite his reluctance to comment, Greene was more voluble earlier Friday before being approached by a reporter in Clay's office. Responding to an earlier call from another reporter, Greene said several times that he initiated the letter without bringing it to the attention of caucus members. He said he wanted to get a reading from other PACs first.

"It's kind of disappointing," Greene said of Heckman's reaction. "It seems to me he should have called me up, asked to go out to lunch, and said, 'I welcome you joining the free-enterprise system.'"

Staff writer Bill Peterson contributed to this report.

2. HX



# STATEMENT OF ORGANIZATION

|   |  |   |
|---|--|---|
| 1. Name of Committee (in full)<br><b>Congressional Black Caucus Political Action Committee</b>          | 2. Date of Filing<br><b>December 3, 1981</b>         | 3. FPC Identification Number<br><b>007600</b> |
| 4. Address (Street and Street Address)<br><b>Post Office Box 2006</b><br><b>Washington, D. C. 20013</b> | 5. Date of Committee Meeting<br><b>DEC-3 PM 3:30</b> |   |

**6. TYPE OF COMMITTEE (check one):**

- ☐ (a) This committee is a principal campaign committee. (Complete the candidate information below.)
  - ☐ (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)
- |                   |                             |               |
|-------------------|-----------------------------|---------------|
| Name of Candidate | Candidate Party Affiliation | Office Sought |
|-------------------|-----------------------------|---------------|
- ☐ (c) This committee supports/approves only one candidate \_\_\_\_\_ and is NOT an authorized committee.
  - ☐ (d) This committee is a \_\_\_\_\_ committee of the \_\_\_\_\_ Party.
  - ☐ (e) This committee is a separate segregated fund.
  - ☐ (f) This committee supports/approves more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

| Name of Any Connected Organization or Affiliated Committee | Mailing Address and ZIP Code | Relationship |
|--|------------------------------|--------------|
| None   |                              |              |

If the registering political committee has identified a "connected organization" above, please indicate type of organization:  
☐ Corporation    ☐ Corporation with Capital Stock    ☐ Labor Organization    ☐ Membership Organization    ☐ Trade Association    ☐ Cooperative

**7. Committee of Records:** Identify by name, address (phone number - optional) and position, the person in possession of committee books and records.

| Full Name            | Mailing Address and ZIP Code     | Title or Position |
|----------------------|----------------------------------|-------------------|
| Hon. William L. Clay | P. O. Box 2006 Wash, D. C. 20013 | Treasurer         |

**8. Treasurer:** List the name and address (phone number - optional) of the Treasurer of the committee; and the name and address of any designee agent (i.e., authorized treasurer).

| Full Name            | Mailing Address and ZIP Code     | Title or Position |
|----------------------|----------------------------------|-------------------|
| Hon. William L. Clay | P. O. Box 2006 Wash, D. C. 20013 | Treasurer         |

**9. Banks or Other Depositories:** List all banks or other depositories in which the committee deposits funds, holds accounts, owns safety deposit boxes or maintains funds.

| Name of Bank, Depository, etc.      | Mailing Address and ZIP Code                             |
|-------------------------------------|--|
| Independence Federal Savings & Loan | 1229 Connecticut Avenue, N.W.<br>Washington, D. C. 20036 |

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

|  |                            |                          |
|--|----------------------------|--------------------------|
| William L. Clay<br>Type or Print Name of Treasurer | <br>SIGNATURE OF TREASURER | December 3, 1981<br>Date |
|--|----------------------------|--------------------------|

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

For further information contact: Federal Election Commission, Toll Free 800-424-9530, Local 202-623-4000

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FEC FORM 1 (2/80)

EXH 3

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

(Summary Page)

1982 JAN 29 AM 11:18

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

**Congressional Black Caucus Political Action Committee**

**Address (Number and Street)**

**P. O. Box 2006**

**City, State and ZIP Code**

**Washington, D.C. 20013**

☐ Check if address is different than previously reported.

**2. FEC Identification Number**

**097693**

**3. Is This committee qualified as a noncandidate committee during this Reporting Period on**

**12/3/81**

**(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

|  | Column A<br>This Period | Column B<br>Calendar Year-to-Date |
|--|-------------------------|-----------------------------------|
| <b>5. Covering Period</b> <u>12/3/81</u> Through <u>12/31/81</u>                                       |                         |                                   |
| <b>6. (a) Cash on Hand January 1, 1981</b> .....   |                         | \$ 0                              |
| <b>(b) Cash on Hand at Beginning of Reporting Period</b> .....   | \$ 0                    |                                   |
| <b>(c) Total Receipts (from Line 10)</b> .....   | \$ 3010.03              | \$ 3010.03                        |
| <b>(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)</b> .....  | \$ 3010.03              | \$ 3010.03                        |
| <b>7. Total Disbursements (from Line 20)</b> .....   | \$ 18.92                | \$ 18.92                          |
| <b>8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))</b> ..                     | \$ 2991.11              | \$ 2991.11                        |
| <b>9. Debts and Obligations Owed TO the Committee (Provide all on Schedule C or Schedule D)</b> .....  | \$ 0                    |                                   |
| <b>10. Debts and Obligations Owed BY the Committee (Provide all on Schedule C or Schedule D)</b> ..... | \$ 0                    |                                   |

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 800-424-9549  
Local 202-693-4000

**Wm. William T. Clay**  
Name or Print Name of Treasurer

*William T. Clay*  
SIGNATURE OF TREASURER

**1/29/82**

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 3 (1-80)

EXH. 4

**Black Caucus Political Action Comm.**

Period Ending the Period: 12/31/81 12/31/81

|  | DOLLAR/A<br>Total This Period | DOLLAR/B<br>Calendar Year-to-Date |
|--|-------------------------------|-----------------------------------|
| <b>I. RECEIPTS</b>   |                               |                                   |
| From (other than listed FROM):   |                               |                                   |
| From Other Than Political Committees                                   | 0                             | 0                                 |
| Very Unusual \$ 0  |                               |                                   |
| From Committees  | 0                             | 0                                 |
| From Committees  | 3000.00                       | 3000.00                           |
| CONTRIBUTIONS (other than listed 11a, 11b and 11c)                     | 3000.00                       | 3000.00                           |
| FROM AFFILIATED/OTHER PARTY COMMITTEES                                 | 0                             | 0                                 |
| RECEIVED   | 0                             | 0                                 |
| EVENTS RECEIVED  | 0                             | 0                                 |
| OPERATING EXPENDITURES (Refunds, Reimburse, etc.)                      | 0                             | 0                                 |
| CONTRIBUTIONS MADE TO FEDERAL CANDIDATES                               | 0                             | 0                                 |
| POLITICAL COMMITTEES   | 0                             | 0                                 |
| CEIPTS (Donations, Interest, etc.)                                     | 10.03                         | 10.03                             |
| CEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)                            | 3010.03                       | 3010.03                           |
| <b>II. DISBURSEMENTS</b>   |                               |                                   |
| NG EXPENDITURES  | 18.92                         | 18.92                             |
| IRS TO AFFILIATED/OTHER PARTY COMMITTEES                               | 0                             | 0                                 |
| ATIONS TO FEDERAL CANDIDATES AND                                       | 0                             | 0                                 |
| POLITICAL COMMITTEES   | 0                             | 0                                 |
| IDENT EXPENDITURES (See Schedule E)                                    | 0                             | 0                                 |
| UNATED EXPENDITURES MADE BY PARTY COMMITTEES                           | 0                             | 0                                 |
| (Schedule F)   | 0                             | 0                                 |
| REPAYMENTS MADE  | 0                             | 0                                 |
| MADE   | 0                             | 0                                 |
| NDOS OF CONTRIBUTIONS TO:  |                               |                                   |
| Individuals/Persons Other Than Political Committees                    | 0                             | 0                                 |
| Other Party Committees   | 0                             | 0                                 |
| Other Political Committees   | 0                             | 0                                 |
| TOTAL CONTRIBUTION REPLENISH (Add 20a, 20b and 20c)                    | 0                             | 0                                 |
| OTHER DISBURSEMENTS  | 0                             | 0                                 |
| TOTAL DISBURSEMENTS (Add Lines 18, 19, 21, 22, 23, 24, 25, 26a and 27) | 18.92                         | 18.92                             |
| <b>NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES</b>                |                               |                                   |
| TOTAL CONTRIBUTIONS (other than listed from Line 11d)                  | 3000.00                       | 3000.00                           |
| TOTAL CONTRIBUTION REPLENISH from Line 20a                             | 0                             | 0                                 |
| ET CONTRIBUTIONS (other than listed) (Subtract Line 20 from Line 20a)  | 3000.00                       | 3000.00                           |
| TOTAL OPERATING EXPENDITURES from Line 18                              | 18.92                         | 18.92                             |
| OFFSETS TO OPERATING EXPENDITURES from Line 18                         | 0                             | 0                                 |
| NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)             | 18.92                         | 18.92                             |

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62-11420-180533

# ITEMIZED RECEIPTS

Use separate schedule for each category of the Deductions Summary Page

Any information copied from such Records or Statements may not be used or cited in any manner for the purpose of collecting contributions or for commercial purposes, other than using the name and address of any individual contributor to such a contribution from such contributor.

| Name of Contributor (in Full)   |   |  |  |
|---|---|--|--|
| <b>Congressional Black Caucus Political Action Committee</b>  |   |  |  |
| <b>A. Full Name, Mailing Address and ZIP Code</b><br>D.C. Friends of Bill Clay<br>P. O. Box 1830<br>Washington, D.C. 20013                  | <b>Name of Employer</b><br><br>Occupation | <b>Date (month, day, year)</b><br>11/14/81 | <b>Amount of Each Receipt This Period</b><br>1000.00 |
| Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                 |   | Aggregate Year-to-Date: \$ 1000.00         |  |
| <b>B. Full Name, Mailing Address and ZIP Code</b><br>Committee for Fauntroy<br>1301 Penn. Avenue, N.W. Suite 1040<br>Washington, D.C. 20004 | <b>Name of Employer</b><br><br>Occupation | <b>Date (month, day, year)</b><br>12/14/81 | <b>Amount of Each Receipt This Period</b><br>1000.00 |
| Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                 |   | Aggregate Year-to-Date: \$ 1000.00         |  |
| <b>C. Full Name, Mailing Address and ZIP Code</b><br>Louis Stokes for Congress Committee<br>P. O. Box 99358<br>Cleveland, Ohio 44199        | <b>Name of Employer</b><br><br>Occupation | <b>Date (month, day, year)</b><br>11/17/81 | <b>Amount of Each Receipt This Period</b><br>1000.00 |
| Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                 |   | Aggregate Year-to-Date: \$ 1000.00         |  |
| <b>D. Full Name, Mailing Address and ZIP Code</b>   | <b>Name of Employer</b><br><br>Occupation | <b>Date (month, day, year)</b>             | <b>Amount of Each Receipt This Period</b>            |
| Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                 |   | Aggregate Year-to-Date: \$                 |  |
| <b>E. Full Name, Mailing Address and ZIP Code</b>   | <b>Name of Employer</b><br><br>Occupation | <b>Date (month, day, year)</b>             | <b>Amount of Each Receipt This Period</b>            |
| Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                 |   | Aggregate Year-to-Date: \$                 |  |
| <b>F. Full Name, Mailing Address and ZIP Code</b>   | <b>Name of Employer</b><br><br>Occupation | <b>Date (month, day, year)</b>             | <b>Amount of Each Receipt This Period</b>            |
| Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                 |   | Aggregate Year-to-Date: \$                 |  |
| <b>G. Full Name, Mailing Address and ZIP Code</b>   | <b>Name of Employer</b><br><br>Occupation | <b>Date (month, day, year)</b>             | <b>Amount of Each Receipt This Period</b>            |
| Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                 |   | Aggregate Year-to-Date: \$                 |  |
| <b>SUBTOTAL of Receipts This Page (optional)</b>  |   |  |  |
| <b>TOTAL This Period (sum page this line number only)</b>   |   |  | 3000.00  |

**SCHEDULE A**

**ITEMIZED RECEIPTS**

For Use by Taxpayers  
This schedule should be attached to each  
return of the donor (see  
Summary Page)

Any information copied from such Reports or Statements may not be valid or relied on for the purpose of obtaining contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such contributors.

Name of Contributor (in Full)  
**Congressional Black Caucus Political Action Committee**

|   |  |   |   |
|---|--|---|---|
| <b>A. Full Name, Mailing Address and ZIP Code</b><br><br><b>Independence Federal Savings &amp; Loan</b><br><b>1229 Connecticut Avenue, N.W.</b><br><b>Washington, D.C. 20036</b><br><br>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | <b>Name of Employer</b><br><br><b>Occupation</b><br><br><b>Aggregate Year-to-Date—\$ 10.03</b> | <b>Date (month, day, year)</b><br><br><b>12/28/81</b> | <b>Amount of Each Receipt This Period</b><br><br><b>10.03</b> |
| <b>B. Full Name, Mailing Address and ZIP Code</b><br><br>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):  | <b>Name of Employer</b><br><br><b>Occupation</b><br><br><b>Aggregate Year-to-Date—\$</b>       | <b>Date (month, day, year)</b>                        | <b>Amount of Each Receipt This Period</b>                     |
| <b>C. Full Name, Mailing Address and ZIP Code</b><br><br>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):  | <b>Name of Employer</b><br><br><b>Occupation</b><br><br><b>Aggregate Year-to-Date—\$</b>       | <b>Date (month, day, year)</b>                        | <b>Amount of Each Receipt This Period</b>                     |
| <b>D. Full Name, Mailing Address and ZIP Code</b><br><br>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):  | <b>Name of Employer</b><br><br><b>Occupation</b><br><br><b>Aggregate Year-to-Date—\$</b>       | <b>Date (month, day, year)</b>                        | <b>Amount of Each Receipt This Period</b>                     |
| <b>E. Full Name, Mailing Address and ZIP Code</b><br><br>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):  | <b>Name of Employer</b><br><br><b>Occupation</b><br><br><b>Aggregate Year-to-Date—\$</b>       | <b>Date (month, day, year)</b>                        | <b>Amount of Each Receipt This Period</b>                     |
| <b>F. Full Name, Mailing Address and ZIP Code</b><br><br>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):  | <b>Name of Employer</b><br><br><b>Occupation</b><br><br><b>Aggregate Year-to-Date—\$</b>       | <b>Date (month, day, year)</b>                        | <b>Amount of Each Receipt This Period</b>                     |
| <b>G. Full Name, Mailing Address and ZIP Code</b><br><br>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):  | <b>Name of Employer</b><br><br><b>Occupation</b><br><br><b>Aggregate Year-to-Date—\$</b>       | <b>Date (month, day, year)</b>                        | <b>Amount of Each Receipt This Period</b>                     |
| <b>GRAND TOTAL of Receipts This Page (optional)</b>   |  |   |   |
| <b>TOTAL This Period (last page this line number only)</b>  |  |   | <b>10.03</b>  |

02012073576

# STANDARD DISBURSEMENTS

January 1981

Information (other than cash receipts and disbursements) may not be sold or used by any person for the purpose of obtaining contributions or for any other purpose, other than using the name and address of any political committee to which contributions were made.

## Congressional Black Caucus Political Action Committee

|   |   |  |   |
|---|---|--|---|
| <p>1. Full Name, Mailing Address and ZIP Code</p> <p>Independence Federal Savings &amp; Loan<br/>1229 Connecticut Avenue, N.W.<br/>Washington, D.C. 20036</p> | <p>Purpose of Disbursement</p> <p>printed check charge</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/><input type="checkbox"/> Other (specify):</p> | <p>Date (month, day, year)</p> <p>12/18/81</p> | <p>Amount of Cash Disbursement This Period</p> <p>18.92</p> |
| <p>2. Full Name, Mailing Address and ZIP Code</p>   | <p>Purpose of Disbursement</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/><input type="checkbox"/> Other (specify):</p>                             | <p>Date (month, day, year)</p>                 | <p>Amount of Cash Disbursement This Period</p>              |
| <p>3. Full Name, Mailing Address and ZIP Code</p>   | <p>Purpose of Disbursement</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/><input type="checkbox"/> Other (specify):</p>                             | <p>Date (month, day, year)</p>                 | <p>Amount of Cash Disbursement This Period</p>              |
| <p>4. Full Name, Mailing Address and ZIP Code</p>   | <p>Purpose of Disbursement</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/><input type="checkbox"/> Other (specify):</p>                             | <p>Date (month, day, year)</p>                 | <p>Amount of Cash Disbursement This Period</p>              |
| <p>5. Full Name, Mailing Address and ZIP Code</p>   | <p>Purpose of Disbursement</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/><input type="checkbox"/> Other (specify):</p>                             | <p>Date (month, day, year)</p>                 | <p>Amount of Cash Disbursement This Period</p>              |
| <p>6. Full Name, Mailing Address and ZIP Code</p>   | <p>Purpose of Disbursement</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/><input type="checkbox"/> Other (specify):</p>                             | <p>Date (month, day, year)</p>                 | <p>Amount of Cash Disbursement This Period</p>              |
| <p>7. Full Name, Mailing Address and ZIP Code</p>   | <p>Purpose of Disbursement</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/><input type="checkbox"/> Other (specify):</p>                             | <p>Date (month, day, year)</p>                 | <p>Amount of Cash Disbursement This Period</p>              |
| <p>8. Full Name, Mailing Address and ZIP Code</p>   | <p>Purpose of Disbursement</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/><input type="checkbox"/> Other (specify):</p>                             | <p>Date (month, day, year)</p>                 | <p>Amount of Cash Disbursement This Period</p>              |
| <p>9. Full Name, Mailing Address and ZIP Code</p>   | <p>Purpose of Disbursement</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/><input type="checkbox"/> Other (specify):</p>                             | <p>Date (month, day, year)</p>                 | <p>Amount of Cash Disbursement This Period</p>              |
| <p>SUBTOTAL of Disbursements This Page (optional)</p>   |   |  |   |
| <p>TOTAL This Period (Sum page 18b line number only)</p>  |   |  | <p>18.92</p>  |

5091609146



**Summary Page**

**1. Name of Committee (in Full)**  
**Congressional Black Caucus**  
**Political Action Committee**

**Address (Number and Street)**  
**P. O. Box 2006**  
**Washington, D.C. 20013**

**City, State and ZIP Code**  
**Washington, D.C. 20013**

☐ Check if address is different than previously reported.

**2. FEC Identification Number**

**077633**

**3. ☐ This committee qualified as a non-federal committee during this Reporting Period on \_\_\_\_\_ (Date)**

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

- (a) ☒ April 15 Quarterly Report  
☐ July 15 Quarterly Report  
☐ October 15 Quarterly Report  
☐ January 31 Year End Report  
☐ July 31 Mid Year Report (Non-Federal Committee Only)  
☐ Monthly Report for \_\_\_\_\_ (Type of Election)  
☐ Twelfth day report preceding \_\_\_\_\_ 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** 1/1/82 Through 3/31/82

**6. (a) Cash on Hand January 1, 1982** .....

**(b) Cash on Hand at Beginning of Reporting Period** .....

**(c) Total Receipts (from Line 10)** .....

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

**7. Total Disbursements (from Line 20)** .....

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

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

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

**Column A**  
**This Period**

**Column B**  
**Calendar Year-to-Date**

|  |            |            |
|--|------------|------------|
|  | \$ 2991.11 | \$ 2991.11 |
|  | \$ 2991.11 |            |
|  | \$ 5000.00 | \$ 5000.00 |
|  | 7991.11    | 7991.11    |
|  | \$ 7854.00 | \$ 7854.00 |
|  | \$ 137.11  | \$ 137.11  |
|  | \$ 0       |            |
|  | 2000.00    |            |

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 800-424-6500  
 Local 202-693-6500

**William L. Clay**

**Chairman**

*W. L. Clay*

**4/7/82**

**Date**

**SIGNATURE OF TREASURER**

**NOTE:** Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §457g.

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

|  |  |  |  |  |  |  |  |  |  |
|--|--|--|--|--|--|--|--|--|--|
|  |  |  |  |  |  |  |  |  |  |
|--|--|--|--|--|--|--|--|--|--|

**FEC FORM 3X (2-80)**

**EXH. 4A**

84040160536

\_\_\_\_\_

# Missional Black Church Collection Access Form

**Present Funding / In-Period:**

From 1/1/82 To 3/31/82

**1. NAME**

**ATTRIBUTIONS (after you heard FROM:**

### Individuals Persons Other Than Political Candidates

Phone Entry Unsuccessful

### **2) Political Party Conventions**

### 2) Other Political Commitments

**20 TOTAL CONTRIBUTIONS (other than amounts in 17a, 17b and 17c)****TRANSFERS FROM AFFILIATED OTHER PARTY COMMITTEES**

**ALL LOANS RECEIVED**

**DEAN REPAYMENTS REQUESTED**

LOSPEETS TO OPERATORS EXPENDITURES (Paving, Repair, etc.)

**1. REP LINES UP CONTRIBUTIONS MADE TO FEDERAL CANDIDATES  
AND OTHER POLITICAL COMMITTEES . . . . .**

7. OTHER RECEIPTS (Donations, Interest, etc.)

18. TOTAL RECEIPTS 1966 141, 12, 12, 14, 12, 10 and 179.

## 2. Background

## 10. OPERATING EXPENDITURES

## 28. TRANSFERS TO AFFILIATED OTHER PARTY COMMITTEES

21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND  
OTHER POLITICAL COMMITTEES ..... 2

## 22 INDEPENDENT EXPENDITURES (See Schedule D)

3. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES  
OF U.S.C. (Article III, Section 7) .....

## 24. LOAN REPAYMENTS MADE

**ALL LEADS MADE**

## 29. REPLACES OF CONTRIBUTIONS TO:

#### Is Individual Purpose Other Than Political Communication

**Abstract**

### Did Other Political Organizations

**THE TOTAL CONTRIBUTION REFLIES THE 1960, 1961 and 1962**

22. OTHER DOCUMENTS

RE FULL EMPLOYMENT: Jan 1971, 71, 72, 73, 74 and 75

**NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES**

28. TOTAL CONTRIBUTIONS UNDER THIS BOARD FROM LINE 190

30. TOTAL CONTRIBUTION REFUSED: \$100,000.00

**SUBJECT COLLECTIONS** - May also have interest like in May 2001

32. TOTAL OPERATING EXPENDITURES from Line 30:

EX DIFFERENTIAL TO OPERATING EXPENDITURES FOR LINE 10.

1967-1968

1A

THIS FORM IS TO BE FILED WITH THE  
FEDERAL BUREAU OF INVESTIGATION  
U.S. DEPARTMENT OF JUSTICE  
WASHINGTON, D.C. 20535  
OMB NO. 1545-0047  
January 1982

Donations from a Political Committee may not be used for any purpose for the purpose of obtaining contributions or for expenses, other than using telephone and address of any political committee to obtain contributions from such committee.

**Section 501(c)(3) National Black Caucus Political Action Committee**

1a. Mailing Address and ZIP Code  
**Bray for Congress Committee**  
 c/o 15038  
 Philadelphia, PA 19121

Name of Employer  
**N/A**  
 Occupation  
**N/A**  
 Aggregate Year-to-Date—\$ **1000.00**

Date (month, day, year)  
**1/29/82**

Amount of Cash Received This Period  
**1000.00**

For: ☒ Primary ☐ General  
 or (specify):

1b. Mailing Address and ZIP Code

1c. Mailing Address and ZIP Code  
**ally for Congress**  
**7 South Main Street**  
**Angeles, CA 90003**

For: ☒ Primary ☐ General  
 or (specify):

1d. Mailing Address and ZIP Code

1e. Mailing Address and ZIP Code  
**land for Congress**  
**67 Woodway, Suite 332**  
**ouston, Texas 77057**

For: ☒ Primary ☐ General  
 or (specify):

1f. Mailing Address and ZIP Code

Name of Employer  
**N/A**  
 Occupation  
**N/A**  
 Aggregate Year-to-Date—\$ **1000.00**

Date (month, day, year)  
**2/9/82**

Amount of Cash Received This Period  
**1000.00**

Name of Employer  
**N/A**  
 Occupation  
**N/A**  
 Aggregate Year-to-Date—\$ **1000.00**

Date (month, day, year)  
**3/12/82**

Amount of Cash Received This Period  
**1000.00**

Name of Employer  
**N/A**  
 Occupation  
**N/A**  
 Aggregate Year-to-Date—\$ **1000.00**

Date (month, day, year)

Amount of Cash Received This Period

For: ☐ Primary ☐ General  
 or (specify):

1g. Mailing Address and ZIP Code

Name of Employer  
**N/A**  
 Occupation  
**N/A**  
 Aggregate Year-to-Date—\$ **1000.00**

Date (month, day, year)

Amount of Cash Received This Period

For: ☐ Primary ☐ General  
 or (specify):

1h. Mailing Address and ZIP Code

Name of Employer  
**N/A**  
 Occupation  
**N/A**  
 Aggregate Year-to-Date—\$ **1000.00**

Date (month, day, year)

Amount of Cash Received This Period

For: ☐ Primary ☐ General  
 or (specify):

1i. Mailing Address and ZIP Code

Name of Employer  
**N/A**  
 Occupation  
**N/A**  
 Aggregate Year-to-Date—\$ **1000.00**

Date (month, day, year)

Amount of Cash Received This Period

For: ☐ Primary ☐ General  
 or (specify):

1j. Mailing Address and ZIP Code

1k. Total of Receipts This Page (attach)

1l. Total of Receipts This Page (attach)

**1000.00**



Section copied from each Report and Statement may not be used or used by any person for the purpose of making contributions or for  
 in person, other than using the name and address of any political committee to which contributions from such committee.

Continued on Page 2

**Congressional Black Caucus Political Action Committee**

|   |  |                                       |   |
|---|--|---------------------------------------|---|
| Name, Mailing Address and ZIP Code<br>28 Skinner Associates<br>85 8th Avenue<br>New York, NY 10001                  | Purpose of Disbursement<br>consulting fees on<br>mailing<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):      | Date (month,<br>day, year)<br>1/5/82  | Amount of Each<br>Disbursement This Period<br>2000.00 |
| Name, Mailing Address and ZIP Code<br>" " " "   | Purpose of Disbursement<br>consulting fees on<br>mailing<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):      | Date (month,<br>day, year)<br>2/4/82  | Amount of Each<br>Disbursement This Period<br>2500.00 |
| Name, Mailing Address and ZIP Code<br>" " " "   | Purpose of Disbursement<br>consulting fees on<br>mailing<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):      | Date (month,<br>day, year)<br>3/13/82 | Amount of Each<br>Disbursement This Period<br>2365.00 |
| Name, Mailing Address and ZIP Code<br>Georgiana Anderson-Land<br>8715 1st Avenue #1401 D<br>Silver Spring, MD 20910 | Purpose of Disbursement<br>reimbursement for<br>parking fee ?<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | Date (month,<br>day, year)<br>2/17/82 | Amount of Each<br>Disbursement This Period<br>60.00   |
| Name, Mailing Address and ZIP Code<br>" " " "   | Purpose of Disbursement<br>consulting fee<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                     | Date (month,<br>day, year)<br>3/1/82  | Amount of Each<br>Disbursement This Period<br>234.00  |
| Name, Mailing Address and ZIP Code<br>" " " "   | Purpose of Disbursement<br>consulting fee<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                     | Date (month,<br>day, year)<br>3/23/82 | Amount of Each<br>Disbursement This Period<br>500.00  |
| Name, Mailing Address and ZIP Code<br>" " " "   | Purpose of Disbursement<br>" " " "<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                            | Date (month,<br>day, year)            | Amount of Each<br>Disbursement This Period            |
| Name, Mailing Address and ZIP Code<br>" " " "   | Purpose of Disbursement<br>" " " "<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                            | Date (month,<br>day, year)            | Amount of Each<br>Disbursement This Period            |
| Name, Mailing Address and ZIP Code<br>" " " "   | Purpose of Disbursement<br>" " " "<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                            | Date (month,<br>day, year)            | Amount of Each<br>Disbursement This Period            |
| TOTAL of Disbursements This Page (continued)  |  |                                       |   |
| TOTAL of Disbursements This Page (continued)  |  |                                       | 7659.00   |

|   |  |  |  |  |
|---|--|--|--|--|
| <b>National Black Caucus Political Action Committee</b><br>1501 Broadway Drive<br>Los Angeles, CA 90035 |  | Original Amount<br>of Loan<br><b>1000.00</b> | Cumulative Payments<br>To Date<br><b>0</b> | Balance Outstanding at<br>Close of This Period<br><b>1000.00</b> |
|---|--|--|--|--|

Security: ☒ Savings ☐ Other (specify): \_\_\_\_\_  
 Term: Due Interest 1/29/82 Due Date Open Interest Rate Waper ☐ Secured

|   |   |  |  |
|---|---|--|--|
| List All Sources or Guarantors (if any) to Item A |   |  |  |
| 1. Full Name, Mailing Address and ZIP Code        | Name of Employer<br>Occupation<br>Amount Guaranteed Outstanding: <u>0</u> |  |  |
| 2. Full Name, Mailing Address and ZIP Code        | Name of Employer<br>Occupation<br>Amount Guaranteed Outstanding: <u>0</u> |  |  |
| 3. Full Name, Mailing Address and ZIP Code        | Name of Employer<br>Occupation<br>Amount Guaranteed Outstanding: <u>0</u> |  |  |

|  |  |  |  |
|--|--|--|--|
| 4. Full Name, Mailing Address and ZIP Code of Loan Source<br><b>Crockett Ser Congress Committee</b><br><b>2161 Brynaston Court</b><br><b>Detroit, MI 48226</b> | Original Amount<br>of Loan<br><b>1000.00</b> | Cumulative Payments<br>To Date<br><b>0</b> | Balance Outstanding at<br>Close of This Period<br><b>1000.00</b> |
|--|--|--|--|

Security: ☒ Savings ☐ Other (specify): \_\_\_\_\_  
 Term: Due Interest 1/29/82 Due Date Open Interest Rate Waper ☐ Secured

|   |   |  |  |
|---|---|--|--|
| List All Sources or Guarantors (if any) to Item B |   |  |  |
| 1. Full Name, Mailing Address and ZIP Code        | Name of Employer<br>Occupation<br>Amount Guaranteed Outstanding: <u>0</u> |  |  |
| 2. Full Name, Mailing Address and ZIP Code        | Name of Employer<br>Occupation<br>Amount Guaranteed Outstanding: <u>0</u> |  |  |
| 3. Full Name, Mailing Address and ZIP Code        | Name of Employer<br>Occupation<br>Amount Guaranteed Outstanding: <u>0</u> |  |  |

|   |                |
|---|----------------|
| SUBTOTAL This Period This Page (optional) .....       |                |
| TOTAL This Period From page 1 to this page only ..... | <b>1000.00</b> |

This document is subject only to LEND II, Schedule C, for this loan. If the borrower is a member of the National Black Caucus Political Action Committee, the borrower shall be deemed to have agreed to the terms of the LEND II, Schedule C.







**DETAILED SUMMARY PAGE  
of Receipts and Disbursements  
FEC FORM 280**

Name of Candidate or Party

**Congressional Black Caucus PAC**

Report Covering the Period:

From: 4/1/ To: 6/30/82

Column A  
Total This Period

Column B  
Calendar Year-to-Date

**I. RECEIPTS**

**11. CONTRIBUTIONS (other than loaned funds):**

(a) Individuals/Persons Other Than Political Committees

11654.77

(State Every Unintended)

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTIONS (other than loaned funds) (11a, 11b, 11c)

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

**13. ALL LOANS RECEIVED**

**14. LOAN REPAYMENTS RECEIVED**

**15. OFFSETS TO OPERATING EXPENDITURES (Federal, State, Loc)**

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

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

**18. TOTAL RECEIPTS (Sum 11a, 12, 13, 14, 15, 16, 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 (See Schedule C)**

**23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 4370(a)(1) See Schedule C)**

**24. LOAN REPAYMENTS MADE**

**25. LOANS MADE**

**26. REPURSES OF CONTRIBUTIONS TO:**

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTION REPURSES (26a, 26b, 26c)

**27. OTHER DISBURSEMENTS**

**28. TOTAL DISBURSEMENTS (Sum 19, 20, 21, 22, 23, 24, 25, 26, 27)**

**29. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES**

**30. TOTAL CONTRIBUTIONS (other than loaned funds)**

**31. TOTAL CONTRIBUTION REPURSES (other than loaned funds)**

**32. NET CONTRIBUTIONS (other than loaned funds) (30 minus 31)**

**33. TOTAL OPERATING EXPENDITURES (other than loaned funds)**

**34. NET OPERATING EXPENDITURES (other than loaned funds)**

**35. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES**

11954.77

11954.77

0

0

6045.00

9045.00

17999.77

20999.77

0

0

0

2000.00

0

0

0

0

0

0

0

0

0

0

17999.77

22999.77

4149.58

12003.58

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0

0

4149.58

12003.58

17999.77

22999.77

0

0

17999.77

22999.77

4149.58

12003.58

0

0

4149.58

12003.58

840404605  
02012191400

# SCHEDULE A

## ITEMIZED RECEIPTS

Use separate schedule for each category of the limited category page

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

Name of Contributor in Full  
**Congressional Black Caucus Political Action Committee**

|   |   |  |  |
|---|---|--|--|
| A. Full Name, Mailing Address and ZIP Code<br><b>A. J. McKnight<br/> P. O. Box 3005<br/> Lafayette, Louisiana 70501</b>               | Name of Employer                                      | Date (month, day, year)<br><b>06/17/82</b> | Amount of Cash Received This Period<br><b>\$300.00</b> |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other Identify: | Occupation<br>Aggregate Year-to-Date-\$ <b>100.00</b> |  |  |
| B. Full Name, Mailing Address and ZIP Code  | Name of Employer                                      | Date (month, day, year)                    | Amount of Cash Received This Period                    |
| Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other Identify:            | Occupation<br>Aggregate Year-to-Date-\$               |  |  |
| C. Full Name, Mailing Address and ZIP Code  | Name of Employer                                      | Date (month, day, year)                    | Amount of Cash Received This Period                    |
| Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other Identify:            | Occupation<br>Aggregate Year-to-Date-\$               |  |  |
| D. Full Name, Mailing Address and ZIP Code  | Name of Employer                                      | Date (month, day, year)                    | Amount of Cash Received This Period                    |
| Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other Identify:            | Occupation<br>Aggregate Year-to-Date-\$               |  |  |
| E. Full Name, Mailing Address and ZIP Code  | Name of Employer                                      | Date (month, day, year)                    | Amount of Cash Received This Period                    |
| Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other Identify:            | Occupation<br>Aggregate Year-to-Date-\$               |  |  |
| F. Full Name, Mailing Address and ZIP Code  | Name of Employer                                      | Date (month, day, year)                    | Amount of Cash Received This Period                    |
| Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other Identify:            | Occupation<br>Aggregate Year-to-Date-\$               |  |  |
| G. Full Name, Mailing Address and ZIP Code  | Name of Employer                                      | Date (month, day, year)                    | Amount of Cash Received This Period                    |
| Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other Identify:            | Occupation<br>Aggregate Year-to-Date-\$               |  |  |
| Total (Sum of All Receipts This Period).....  |   |  | <b>100.00</b>  |

02012191500



**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 1 of 1  
 Line Number 116  
 Also attach statement for  
 history of the donor  
 Summary Page

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

Name of Committee (in Full)

**Congressional Black Caucus Political Action Committee**

A. Full Name, Mailing Address and ZIP Code

**Parren J. Mitchell Campaign For Congress  
 Committee  
 Suite 301, 4 East Franklin Street  
 Baltimore, Md. 21202**

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

Name of Employer

Date (month,  
 day, year)

Amount of \$  
 Receipt This P

Occupation

06/11/82

\$1,000.00

Aggregate Year-to-Date-\$ **1,000.00**

B. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
 day, year)

Amount of \$  
 Receipt This P

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 \$  
 Receipt This P

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 \$  
 Receipt This P

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 \$  
 Receipt This P

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 \$  
 Receipt This P

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 \$  
 Receipt This P

Occupation

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

Aggregate Year-to-Date-\$

H. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
 day, year)

Amount of \$  
 Receipt This P

Occupation

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

Aggregate Year-to-Date-\$

I. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
 day, year)

Amount of \$  
 Receipt This P

Occupation

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

Aggregate Year-to-Date-\$

84040460544  
 02012191501

1000.00



# SCHEDULE A

## ITEMIZED RECEIPTS

Page 2 of 1 for  
 LARS NUMBER 116  
 (Use separate sheets for each  
 receipt of the Detailed  
 Summary Page)

Any information copied from past 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) Congressional Black Caucus Political Action Committee

|  |                                   |                            |  |
|--|-----------------------------------|----------------------------|--|
| A. Full Name, Mailing Address and ZIP Code<br>Committee On Political Action of the<br>American Postal Workers Union, AFL-CIO<br>817 14th Street N.W.<br>Washington, D.C. 20005 | Name of Employer                  | Date (month,<br>day, year) | Amount of Cash<br>Receipt This Period<br><br>\$1000.00 |
|  | Occupation                        | 04/16/82                   |  |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):   | Aggregate Year-to-Date-\$ 1000.00 |                            |  |

|  |                                  |                            |   |
|--|----------------------------------|----------------------------|---|
| B. Full Name, Mailing Address and ZIP Code<br>Black Affairs Center, Inc.<br>Washington, D. C. 20011                                    | Name of Employer                 | Date (month,<br>day, year) | Amount of Cash<br>Receipt This Period<br><br>\$100.00 |
|  | Occupation                       | 04/16/82                   |   |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | Aggregate Year-to-Date-\$ 100.00 |                            |   |

|   |                                   |                            |  |
|---|-----------------------------------|----------------------------|--|
| C. Full Name, Mailing Address and ZIP Code<br>Engineers Political Education Committee<br>1125 17th Street N.W.<br>Washington, D. C. 20036 | Name of Employer                  | Date (month,<br>day, year) | Amount of Cash<br>Receipt This Period<br><br>\$1500.00 |
|   | Occupation                        | 04/21/82                   |  |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):    | Aggregate Year-to-Date-\$ 1500.00 |                            |  |

|   |                                  |                            |   |
|---|----------------------------------|----------------------------|---|
| D. Full Name, Mailing Address and ZIP Code<br>Longshoremen's Political Action Committee<br>17 Battery Place<br>New York, New York 10004 | Name of Employer                 | Date (month,<br>day, year) | Amount of Cash<br>Receipt This Period<br><br>\$500.00 |
|   | Occupation                       | 05/24/82                   |   |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):  | Aggregate Year-to-Date-\$ 500.00 |                            |   |

|  |                                  |                            |   |
|--|----------------------------------|----------------------------|---|
| E. Full Name, Mailing Address and ZIP Code<br>Industrial Union Division - AFL-CIO<br>815 16th Street N.W.<br>Washington, D. C. 20006   | Name of Employer                 | Date (month,<br>day, year) | Amount of Cash<br>Receipt This Period<br><br>\$100.00 |
|  | Occupation                       | 06/24/82                   |   |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | Aggregate Year-to-Date-\$ 100.00 |                            |   |

|  |                                   |                            |  |
|--|-----------------------------------|----------------------------|--|
| F. Full Name, Mailing Address and ZIP Code<br>Letter Carriers Political Education Com.<br>1 Indiana Ave. N.W.<br>Washington, D. C. 20001 | Name of Employer                  | Date (month,<br>day, year) | Amount of Cash<br>Receipt This Period<br><br>\$1000.00 |
|  | Occupation                        | 04/15/82                   |  |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):   | Aggregate Year-to-Date-\$ 1000.00 |                            |  |

|   |                                  |                            |   |
|---|----------------------------------|----------------------------|---|
| G. Full Name, Mailing Address and ZIP Code<br>(blank)   | Name of Employer                 | Date (month,<br>day, year) | Amount of Cash<br>Receipt This Period<br><br>\$270.00 |
|   | Occupation                       | 07/82                      |   |
| Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | Aggregate Year-to-Date-\$ 270.00 |                            |   |

|   |                                  |                            |   |
|---|----------------------------------|----------------------------|---|
| H. Full Name, Mailing Address and ZIP Code<br>(blank)   | Name of Employer                 | Date (month,<br>day, year) | Amount of Cash<br>Receipt This Period<br><br>\$270.00 |
|   | Occupation                       | 07/82                      |   |
| Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | Aggregate Year-to-Date-\$ 270.00 |                            |   |

8 4 0 24 00 11261095400

# SCHEDULE A

# ITEMIZED RECEIPTS

U.S. DEPARTMENT OF THE TREASURY  
Internal Revenue Service

Any information copied from such Reports or Statements may not be sold or used for any purpose other than the purpose for which it was furnished to the Government, either state using the name and address of any political committee to which contributions have been received.

| Name of Committee or Fund   |                  |                                     |   |
|---|------------------|-------------------------------------|---|
| Congressional Black Caucus Political Action Committee   |                  |                                     |   |
| A. Full Name, Mailing Address and ZIP Code<br>John D. O'Bryen Campaign Fund<br>52 Hillsboro Road<br>Mattapan, Massachusetts 02126                           | Name of Employer | Date (month, day, year)<br>05/24/82 | Amount of Cash Received This Period<br>\$50.00  |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                      | Occupation       |                                     |   |
| Aggregate Year-to-Date-0  |                  |                                     |   |
| B. Full Name, Mailing Address and ZIP Code<br>Association of Black Women Attorneys<br>25 St. Nicholas Terrace<br>New York, New York 10027                   | Name of Employer | Date (month, day, year)<br>06/24/82 | Amount of Cash Received This Period<br>\$50.00  |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                      | Occupation       |                                     |   |
| Aggregate Year-to-Date-0  |                  |                                     |   |
| C. Full Name, Mailing Address and ZIP Code<br>Tuskegee Minister's Council<br>P. O. Box 1213<br>Tuskegee, Alabama 36088                                      | Name of Employer | Date (month, day, year)<br>06/11/82 | Amount of Cash Received This Period<br>\$25.00  |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                      | Occupation       |                                     |   |
| Aggregate Year-to-Date-0  |                  |                                     |   |
| D. Full Name, Mailing Address and ZIP Code<br>District Council of Washington, D.C. and Vicinity<br>1025 Vermont Avenue, Suite 720<br>Washington, D.C. 20005 | Name of Employer | Date (month, day, year)<br>06/11/82 | Amount of Cash Received This Period<br>\$100.00 |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                      | Occupation       |                                     |   |
| Aggregate Year-to-Date-0  |                  |                                     |   |
| E. Full Name, Mailing Address and ZIP Code<br>Donald J. Leeper Campaign Fund<br>400 Stonepost Road<br>Charlotte, N.C. 28210                                 | Name of Employer | Date (month, day, year)<br>06/17/82 | Amount of Cash Received This Period<br>\$25.00  |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                      | Occupation       |                                     |   |
| Aggregate Year-to-Date-0  |                  |                                     |   |
| F. Full Name, Mailing Address and ZIP Code<br>Balllock Washateria & Food Mart<br>180 St. Augustine Street<br>Natchez, Mississippi 39048                     | Name of Employer | Date (month, day, year)<br>06/17/82 | Amount of Cash Received This Period<br>\$25.00  |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                      | Occupation       |                                     |   |
| Aggregate Year-to-Date-0  |                  |                                     |   |
| G. Full Name, Mailing Address and ZIP Code<br>Shiloh Baptist Church<br>Baltimore Ave. & Linnvale Street<br>Baltimore, Md. 21217                             | Name of Employer | Date (month, day, year)<br>06/17/82 | Amount of Cash Received This Period<br>\$50.00  |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                      | Occupation       |                                     |   |
| Aggregate Year-to-Date-0  |                  |                                     |   |
| Total Cash Received   |                  |                                     | \$255.00  |

8404046053  
02012191503

# SCHEDULE A

# ITEMIZED RECEIPTS

Page 4 of 12  
 This receipt is for the  
 amount of \$50.00  
 received from the  
 donor of the above  
 named item.

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)

**Congressional Black Caucus Political Action Committee**

A. Full Name, Mailing Address and ZIP Code  
**Bethel Baptist Church**  
**Home Ave. & Summit Street**  
**Dayton, Ohio 45407**

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

06/17/82

\$50.00

Occupation

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

Aggregate Year-to-Date—\$ **50.00**

B. Full Name, Mailing Address and ZIP Code  
**Fabricare Center**  
**3946-50 West 16th Street**  
**Chicago, Illinois 60623**

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

06/11/82

\$100.00

Occupation

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

Aggregate Year-to-Date—\$ **100.00**

C. Full Name, Mailing Address and ZIP Code  
**Mount Carmel Baptist Church**  
**1376-78 Prospect Avenue**  
**Bronx, New York 10459**

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

06/11/82

\$50.00

Occupation

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

Aggregate Year-to-Date—\$ **50.00**

D. Full Name, Mailing Address and ZIP Code  
**Capital Outlook**  
**P. O. Box 20267**  
**Tallahassee, Florida 32304**

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

06/11/82

\$25.00

Occupation

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

Aggregate Year-to-Date—\$ **25.00**

E. Full Name, Mailing Address and ZIP Code  
**United Church of Christ**  
**103 Madison Avenue**  
**New York, New York 10016**

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

06/11/82

\$25.00

Occupation

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

Aggregate Year-to-Date—\$ **25.00**

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—\$

Signature of Donor (The First Name)

\$50.00

\$345.00

84040160547  
 02012191504



**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

**Do not include**  
the amount scheduled for each  
entry of the Detailed  
Summary Page

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

Name of Committee (in Full)  
**Congressional Black Caucus Political Action Committee**

|  |   |  |  |
|--|---|--|--|
| A. Full Name, Mailing Address and ZIP Code<br>Ms. Georgiana Anderson-Land<br>8715 First Avenue #1401 D<br>Silver Spring, Md. 20910 | Purpose of Disbursement<br><b>Salary</b>  | Date (month,<br>day, year)<br>06/21/82 | Amount of Each<br>Disbursement This Period<br>\$2,000.00 |
|  | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |  |  |
| B. Full Name, Mailing Address and ZIP Code<br>"  | Purpose of Disbursement<br><b>Postage Reimbursement</b>   | Date (month,<br>day, year)<br>05/05/82 | Amount of Each<br>Disbursement This Period<br>\$40.00    |
|  | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |  |  |
| C. Full Name, Mailing Address and ZIP Code<br>"  | Purpose of Disbursement<br><b>Salary</b>  | Date (month,<br>day, year)<br>05/18/82 | Amount of Each<br>Disbursement This Period<br>\$600.00   |
|  | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |  |  |
| D. Full Name, Mailing Address and ZIP Code<br>"  | Purpose of Disbursement<br><b>Reimbursement for Postage<br/>and Printing</b>  | Date (month,<br>day, year)<br>05/19/82 | Amount of Each<br>Disbursement This Period<br>\$231.58   |
|  | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |  |  |
| E. Full Name, Mailing Address and ZIP Code<br>"  | Purpose of Disbursement<br><b>Salary</b>  | Date (month,<br>day, year)<br>05/27/82 | Amount of Each<br>Disbursement This Period<br>\$1000.00  |
|  | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |  |  |
| F. Full Name, Mailing Address and ZIP Code<br>David R. Fennage, Inc.<br>WA-29 Langworth BOB<br>Washington, D.C. 20515              | Purpose of Disbursement<br><b>Mailing Cards, Cards and<br/>envelopes for letterhead</b>   | Date (month,<br>day, year)<br>06/17/82 | Amount of Each<br>Disbursement This Period<br>\$278.00   |
|  | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |  |  |
| G. Full Name, Mailing Address and ZIP Code   | Purpose of Disbursement   | Date (month,<br>day, year)             | Amount of Each<br>Disbursement This Period               |
|  | Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):            |  |  |
| H. Full Name, Mailing Address and ZIP Code   | Purpose of Disbursement   | Date (month,<br>day, year)             | Amount of Each<br>Disbursement This Period               |
|  | Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):            |  |  |
| I. Full Name, Mailing Address and ZIP Code   | Purpose of Disbursement   | Date (month,<br>day, year)             | Amount of Each<br>Disbursement This Period               |
|  | Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):            |  |  |

TOTAL (of Disbursements This Page (Lines A-I))

\$4,149.58

4940160548

# **DO NOT DELIVER** REPORT OF RECEIPTS AND DISBURSEMENTS Filed Committee Other Than an Authorized Committee

097683

(Summary Page)

ALIAS AREA

FEDERAL ELECTION COMMISSION

ALIAS AREA

1. Name of Committee (in Full)

**Congressional Black Caucus Political Action Committee**

Address (Number and Street)

**PO Box 2006**

City, State and ZIP Code

**Washington, DC 20013**

☐ Check here if address is different than previously reported.

2. FEC Identification Number

**097683**

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

4. TYPE OF REPORT (check appropriate boxes)

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

☐ July 15 Quarterly Report ☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non Section 501(c)(3) Only)

☐ Monthly Report for \_\_\_\_\_

☐ Twelfth day report preceding \_\_\_\_\_

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

☐ Thirtieth day report following the General Election

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

☐ Termination Report

(b) Is this Report on Amendments?

☐ YES

☐ NO

## **SUMMARY**

5. Covering Period **7/1/82** through **9/30/82**

6. (a) Cash on hand January 1, 19 **82**

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 10)

(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 20)

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

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

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

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

**Congressman Louis Stokes**

*[Signature]*  
 Signature of Treasurer

**10/13/82**

Date

For further information contact:

Federal Election Commission

Toll Free 800-424-9630

Local 202-633-4088

NOTE: Submission of this statement 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 (3/78)

EXH. 6



**Congressional Black Caucus Political Action Committee**

72115 9/10/82




## 11. CONTRIBUTIONS (Indicate the source of funds):

### And Institutionally Beyond Other Than Political Conventions

Return Every Understanding \$ 1.24 50

**Red Political Party: Communism**

#### (d) Other Political Contributions

(d) TOTAL CONTRIBUTIONS (other than loans) (add 19(a), 19(b) and 19(c))

## 12. TRANSFERS FROM AFFILIATED OTHER PARTY COMMITTEES

## 12. ALL LOANS RECEIVED

#### 14. LOAN REPAYMENTS RECEIVED

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

## 12. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES

17. OTHER RECEIPTS (Dividends, interest, etc.)

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

## 11. DISBURSEMENTS

**19. OPERATING EXPENDITURES.**

### 30. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES

21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND  
OTHER POLITICAL COMMITTEES

22 INDEPENDENT EXPENDITURES (see Schedule E)

### 21. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES

(2 U.S.C. 2441 and 18 U.S.C. 2385)

2. LOAN REPAYMENTS MADE

**PLANE MAN**

## REPLACEMENT OF CONTRIBUTIONS TO

### 2nd Indictment: Persons Other Than Political Committeemen

10/1/77

1990

14. TOTAL COST TO BUY OR REFINISH (Add 23a, 24a) and 25a.)

### 7. OTHER DOCUMENTS

38 TOTAL DISBURSEMENTS 19 20, 21, 22, 23, 24, 25 26 27.

#### IN NET CONTROLLING COST AND NET OPERATING EXPENDITURES

33 TOTAL CONTRIBUTIONS (other than from Line 11) \$

32. TOTAL CONTRIBUTION REFUNDS (net line 29(d))

21. NET CONTRIBUTION (Loss) after taxes: Subtract Line 30 from Line 20

1. The first step is to identify the problem or question that needs to be answered. This involves understanding the context and the specific requirements of the task.

100-443887-100

... ..



**SCHEDULE A**

**UNITED RECEIPTS**

For the use of the donor and the recipient of the gift only. Do not attach to the gift tax return.

Any information omitted 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 person mentioned to solicit contributions from such persons.

Name of Donor (in Full)

**Collegiate Black Caucus Political Action Committee**

A. Full Name, Mailing Address and ZIP Code

**Porter Bankhead  
7928 16th Street, NW  
Washington, DC 20012**

Name of Employer

**Systems & Applied  
Sciences Corp.**

Date (month,  
day, year)

**7/26/82**

Amount of Cash  
Receipt This Period

**1000.00**

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

Occupation

**businessman**

Aggregate Year-to-Date—\$

**1000.00**

B. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)

Amount of Cash  
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 Cash  
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 Cash  
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 Cash  
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 Cash  
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 Cash  
Receipt This Period

Occupation

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 Cash  
Receipt This Period

Occupation

Aggregate Year-to-Date—\$

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

I. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)

Amount of Cash  
Receipt This Period

Occupation

Aggregate Year-to-Date—\$

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

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# SCHEDULE A

# ITEMIZED RECEIPTS



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 contributors.

Name of Committee (in Full)

**Congressional Black Caucus Political Action Committee**

| A. Full Name, Mailing Address and ZIP Code   | Name of Employer   | Date (month, day, year) | Amount of Each Receipt This Period |
|--|--|-------------------------|------------------------------------|
| Lambda Omega Chapter of Omega Psi Phi Fraternity<br>PO Box 1805<br>Norfolk, VA 23501   |  | 7/1/82                  | 25.00                              |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | Occupation: <b>sorority</b><br>Aggregate Year-to-Date - \$ <b>25.00</b>            |                         |                                    |
| B. Full Name, Mailing Address and ZIP Code   | Name of Employer   | Date (month, day, year) | Amount of Each Receipt This Period |
| Black Nurses Association of GMA<br>PO Box 1673<br>Washington, DC 20011   |  | 7/1/82                  | 25.00                              |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | Occupation: <b>association</b><br>Aggregate Year-to-Date - \$ <b>25.00</b>         |                         |                                    |
| C. Full Name, Mailing Address and ZIP Code   | Name of Employer   | Date (month, day, year) | Amount of Each Receipt This Period |
| Alpha Gamma Chapter Eta Phi Beta<br>15901 Bunche Park E. Dr.<br>Opa Locka, FL 33054  |  | 7/1/82                  | 25.00                              |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | Occupation: <b>sorority</b><br>Aggregate Year-to-Date - \$ <b>25.00</b>            |                         |                                    |
| D. Full Name, Mailing Address and ZIP Code   | Name of Employer   | Date (month, day, year) | Amount of Each Receipt This Period |
| Brown & Williamson Tobacco Corp.<br>Tobacco Support Committee<br>1600 W Hill St. PO Box 35090<br>Louisville, KY 40232                  |  | 7/1/82                  | 500.00                             |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | Occupation: <b>PAC</b><br>Aggregate Year-to-Date - \$ <b>500.00</b>                |                         |                                    |
| E. Full Name, Mailing Address and ZIP Code   | Name of Employer   | Date (month, day, year) | Amount of Each Receipt This Period |
| Leviticus International<br>45 W. 33rd Street, NY 10001   |  | 7/1/82                  | 100.00                             |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | Occupation: <b>entertainment club</b><br>Aggregate Year-to-Date - \$ <b>100.00</b> |                         |                                    |
| F. Full Name, Mailing Address and ZIP Code   | Name of Employer   | Date (month, day, year) | Amount of Each Receipt This Period |
| Mt. Zion Deacon's Mission Fund<br>603 N. Augusta St.<br>Charleston, VA 24401   |  | 7/7/82                  | 25.00                              |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | Occupation: <b>church fund</b><br>Aggregate Year-to-Date - \$ <b>25.00</b>         |                         |                                    |
| G. Full Name, Mailing Address and ZIP Code   | Name of Employer   | Date (month, day, year) | Amount of Each Receipt This Period |
| Bonner & Northcock, MD's LTD.<br>2nd & Franklin Sts. Suite 201<br>PO Box 12406<br>Richmond, VA   |  | 9/1/82                  | 25.00                              |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | Occupation: <b>health club</b><br>Aggregate Year-to-Date - \$ <b>25.00</b>         |                         |                                    |
| SUBTOTAL of Receipts This Page (optional)  |  |                         | 775.00                             |
| TOTAL of Receipts for this month (optional)  |  |                         |                                    |

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Any information reported from such sources or documents may not be added or used by any person for the purpose of procuring contributions or for any other purpose, other than using the name and address of any political committee to solicit contributions, from such sources.

**Congressional Black Caucus Political Action Committee**

|   |  |   |  |
|---|--|---|--|
| <b>A. Full Name, Mailing Address and ZIP Code</b><br>Widens Variety Service Company<br>86 Ludlow Street<br>Stamford, CT 06902                 | <b>Name of Employer</b><br><br><b>Occupation</b><br>BUSINESS | <b>Date (month, day, year)</b><br>7/26/82 | <b>Amount of Each Receipt This Period</b><br>25.00   |
| <b>Receipt For:</b> <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |  | <b>Aggregate Year-to-Date—\$</b> 25.00    |  |
| <b>B. Full Name, Mailing Address and ZIP Code</b><br>Computer Sciences Corp. PAC<br>850 N. Sepulveda Blvd.<br>El Segundo, CA 90245            | <b>Name of Employer</b><br><br><b>Occupation</b><br>PAC      | <b>Date (month, day, year)</b><br>8/12/82 | <b>Amount of Each Receipt This Period</b><br>1000.00 |
| <b>Receipt For:</b> <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |  | <b>Aggregate Year-to-Date—\$</b> 1000.00  |  |
| <b>C. Full Name, Mailing Address and ZIP Code</b><br>[Blank]  | <b>Name of Employer</b><br><br><b>Occupation</b>             | <b>Date (month, day, year)</b>            | <b>Amount of Each Receipt This Period</b>            |
| <b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):            |  | <b>Aggregate Year-to-Date—\$</b>          |  |
| <b>D. Full Name, Mailing Address and ZIP Code</b><br>[Blank]  | <b>Name of Employer</b><br><br><b>Occupation</b>             | <b>Date (month, day, year)</b>            | <b>Amount of Each Receipt This Period</b>            |
| <b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):            |  | <b>Aggregate Year-to-Date—\$</b>          |  |
| <b>E. Full Name, Mailing Address and ZIP Code</b><br>[Blank]  | <b>Name of Employer</b><br><br><b>Occupation</b>             | <b>Date (month, day, year)</b>            | <b>Amount of Each Receipt This Period</b>            |
| <b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):            |  | <b>Aggregate Year-to-Date—\$</b>          |  |
| <b>F. Full Name, Mailing Address and ZIP Code</b><br>[Blank]  | <b>Name of Employer</b><br><br><b>Occupation</b>             | <b>Date (month, day, year)</b>            | <b>Amount of Each Receipt This Period</b>            |
| <b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):            |  | <b>Aggregate Year-to-Date—\$</b>          |  |
| <b>G. Full Name, Mailing Address and ZIP Code</b><br>[Blank]  | <b>Name of Employer</b><br><br><b>Occupation</b>             | <b>Date (month, day, year)</b>            | <b>Amount of Each Receipt This Period</b>            |
| <b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):            |  | <b>Aggregate Year-to-Date—\$</b>          |  |
| <b>H. Full Name, Mailing Address and ZIP Code</b><br>[Blank]  | <b>Name of Employer</b><br><br><b>Occupation</b>             | <b>Date (month, day, year)</b>            | <b>Amount of Each Receipt This Period</b>            |
| <b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):            |  | <b>Aggregate Year-to-Date—\$</b>          |  |

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**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

See instructions on the reverse side of this page for the proper use of this form.

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)

**Congressional Black Caucus Political Action Committee**

| A. Full Name, Mailing Address and ZIP Code                        | Purpose of Disbursement  | Date (month, day, year) | Amount of Each Disbursement This Period |
|---|--|-------------------------|---|
|   | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): |                         |   |
| David Ramage, Inc.<br>WA-29 Longworth HOB<br>Washington, DC 20515 | printing of invitations  | 7/15/82                 | 82.00                                   |
| B. Full Name, Mailing Address and ZIP Code                        | Purpose of Disbursement  | Date (month, day, year) | Amount of Each Disbursement This Period |
|   | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): |                         |   |
| Metro Business Forms<br>8543 Groveton Circle<br>Gaithersburg, MD  | letterhead cancellation fee  | 7/19/82                 | 95.00                                   |
| C. Full Name, Mailing Address and ZIP Code                        | Purpose of Disbursement  | Date (month, day, year) | Amount of Each Disbursement This Period |
|   | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): |                         |   |
| SAME AS ABOVE   | letterhead printing  | 8/12/82                 | 302.32                                  |
| D. Full Name, Mailing Address and ZIP Code                        | Purpose of Disbursement  | Date (month, day, year) | Amount of Each Disbursement This Period |
|   | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): |                         |   |
| U.S. Postmaster<br>Main Post Office<br>Washington, DC 20013       | PO Box rental fee  | 8/12/82                 | 20.00                                   |
| E. Full Name, Mailing Address and ZIP Code                        | Purpose of Disbursement  | Date (month, day, year) | Amount of Each Disbursement This Period |
|   | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): |                         |   |
| SAME AS ABOVE   | postage -- stamps  | 9/10/82                 | 120.00                                  |
| F. Full Name, Mailing Address and ZIP Code                        | Purpose of Disbursement  | Date (month, day, year) | Amount of Each Disbursement This Period |
|   | Disbursement for: <input type="checkbox"/> Primary <input 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)**

399.32

**NOTE: All Disbursements Must Be Paid Within 60 Days**

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SCHEDULE C

ITEMIZED DISBURSEMENTS

For use by candidates for federal office only  
This schedule must be filed with the report of the campaign  
by the date of filing the report.

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Name of Committee (in Full)

Congressional Black Caucus Political Action Committee

|  |  |   |  |
|--|--|---|--|
| <p>A. Full Name, Mailing Address and ZIP Code</p> <p>Wheat for Congress Committee<br/>3123 Swope Parkway<br/>Kansas City, MO 64130</p>     | <p>Purpose of Disbursement</p> <p>political contribution</p> <p>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br/><input type="checkbox"/> Other (specify):</p> | <p>Date (month, day, year)</p> <p>9/21/82</p> | <p>Amount of Each Disbursement This Period</p> <p>500.00</p> |
| <p>B. Full Name, Mailing Address and ZIP Code</p> <p>Committee to Elect Ken Mosely<br/>PO Drawer 1569<br/>Orangeburg, SC 29115</p>         | <p>Purpose of Disbursement</p> <p>political contribution</p> <p>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br/><input type="checkbox"/> Other (specify):</p> | <p>Date (month, day, year)</p> <p>9/21/82</p> | <p>Amount of Each Disbursement This Period</p> <p>500.00</p> |
| <p>C. Full Name, Mailing Address and ZIP Code</p> <p>Robert Clarke for Congress Comm.<br/>PO Box 179<br/>320 Yazoo Lexington, MS 39095</p> | <p>Purpose of Disbursement</p> <p>political contribution</p> <p>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br/><input type="checkbox"/> Other (specify):</p> | <p>Date (month, day, year)</p> <p>9/21/82</p> | <p>Amount of Each Disbursement This Period</p> <p>500.00</p> |
| <p>D. Full Name, Mailing Address and ZIP Code</p>  | <p>Purpose of Disbursement</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/><input type="checkbox"/> Other (specify):</p>  | <p>Date (month, day, year)</p>                | <p>Amount of Each Disbursement This Period</p>               |
| <p>E. Full Name, Mailing Address and ZIP Code</p>  | <p>Purpose of Disbursement</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/><input type="checkbox"/> Other (specify):</p>  | <p>Date (month, day, year)</p>                | <p>Amount of Each Disbursement This Period</p>               |
| <p>F. Full Name, Mailing Address and ZIP Code</p>  | <p>Purpose of Disbursement</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/><input type="checkbox"/> Other (specify):</p>  | <p>Date (month, day, year)</p>                | <p>Amount of Each Disbursement This Period</p>               |
| <p>G. Full Name, Mailing Address and ZIP Code</p>  | <p>Purpose of Disbursement</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/><input type="checkbox"/> Other (specify):</p>  | <p>Date (month, day, year)</p>                | <p>Amount of Each Disbursement This Period</p>               |
| <p>H. Full Name, Mailing Address and ZIP Code</p>  | <p>Purpose of Disbursement</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/><input type="checkbox"/> Other (specify):</p>  | <p>Date (month, day, year)</p>                | <p>Amount of Each Disbursement This Period</p>               |
| <p>I. Full Name, Mailing Address and ZIP Code</p>  | <p>Purpose of Disbursement</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/><input type="checkbox"/> Other (specify):</p>  | <p>Date (month, day, year)</p>                | <p>Amount of Each Disbursement This Period</p>               |
| <p>TOTAL of Disbursements This Period</p>  |  |   | <p>1500.00</p>   |
| <p>TOTAL This Period from all the member(s)</p>  |  |   | <p>1500.00</p>   |

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

Name of Committee in Full  
**Congressional Black Caucus 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>Crockett for Congress Committee<br/>2161 Brynston Court<br/>Detroit, MI 48226</b> | repayment of loan<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | <b>7/15/82</b>          | <b>1000.00</b>                          |
| B. Full Name, Mailing Address and ZIP Code   | Purpose of Disbursement<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):      | Date (month, day, year) | Amount of Each Disbursement This Period |
| TOTAL of Disbursements This Page (including)   |  |                         |   |
| TOTAL of Disbursements This Page (including)   |  |                         | 1000.00                                 |

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Any information copied from such Reports and Disbursements 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 sources.

Name of Committee (in Full)  
**Congressional Black Caucus Political Action Committee**

| A. Full Name, Mailing Address and ZIP Code  | Purpose of Disbursement   | Date (month, day, year) | Amount of Each Disbursement This Period |
|---|---|-------------------------|---|
|   | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                         |   |
| <b>Bill Gray for Congress Committee<br/>PO Box 18038<br/>Philadelphia, PA 19121</b> | <b>refund of contribution</b>   | <b>9/17/82</b>          | <b>1000.00</b>                          |
| 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<br><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<br><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<br><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<br><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<br><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<br><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<br><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<br><input type="checkbox"/> Other (specify):            |                         |   |
| Total of Disbursements This Period  |   |                         | <b>1000.00</b>                          |

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LOANS

See instructions  
on back of this form

|   |  |   |   |
|---|--|---|---|
| Name of Organization (in Full)<br><b>Congressional Black Caucus Political Action Committee</b>  |  |   |   |
| A. Full Name, Mailing Address and ZIP Code of Loan Source<br><b>Crockett for Congress Committee<br/>2161 Bryanston Court<br/>Detroit, MI 48226</b>      |  | Original Amount of Loan<br><b>1000.00</b>                     | Contributing Payments To Date<br><b>1000.00</b> |
| Section: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify):                         |  | Balance Outstanding at Close of This Period<br><b>- 0 -</b>   |   |
| Terms: Date Incurred <b>1/29/82</b> Date Due <b>05/82</b> Interest Rate <b>0</b> % (per) <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<br><b>0</b>                     |   |
| 2. Full Name, Mailing Address and ZIP Code  |  | Name of Employer  |   |
|   |  | Occupation  |   |
|   |  | Amount Guaranteed Outstanding<br><b>0</b>                     |   |
| 3. Full Name, Mailing Address and ZIP Code  |  | Name of Employer  |   |
|   |  | Occupation  |   |
|   |  | Amount Guaranteed Outstanding<br><b>0</b>                     |   |
| B. Full Name, Mailing Address and ZIP Code of Loan Source<br><b>Julian C. Dixon, Dem. for Congress<br/>1581 Roxbury Drive<br/>Los Angeles, CA 90035</b> |  | Original Amount of Loan<br><b>1000.00</b>                     | Contributing Payments To Date<br><b>- 0 -</b>   |
| Section: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify):                         |  | Balance Outstanding at Close of This Period<br><b>1000.00</b> |   |
| Terms: Date Incurred <b>1/29/82</b> Date Due <b>05/82</b> Interest Rate <b>0</b> % (per) <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<br><b>0</b>                     |   |
| 2. Full Name, Mailing Address and ZIP Code  |  | Name of Employer  |   |
|   |  | Occupation  |   |
|   |  | Amount Guaranteed Outstanding<br><b>0</b>                     |   |
| 3. Full Name, Mailing Address and ZIP Code  |  | Name of Employer  |   |
|   |  | Occupation  |   |
|   |  | Amount Guaranteed Outstanding<br><b>0</b>                     |   |

84040160550  
62012271938



REC-119 : 13F

**HAND DELIVERED**

**(Summary Page)**

## HAND DELIVERED

82 DEC 14 P1:

1 Name of Committee (in Full)  
Congressional Black Caucus Political  
Action Committee  
Address (Number and Street)  
PO Box 2006  
City, State and ZIP Code  
Washington, DC 20013  
Check if address is different than previously reported.

2 FEC Identification Number  
097683

3 This committee qualified as a multicandidate com-  
mittee during this Reporting Period on \_\_\_\_\_ (date)

4. TYPE OF REPORT (check appropriate box)  
(a) April 15 Quarterly Report  
July 15 Quarterly Report  
October 15 Quarterly Report  
January 31 Year End Report  
July 31 Mid Year Report (Non-electoral Year Only)  
Monthly Report for \_\_\_\_\_  
Twelfth day report preceding \_\_\_\_\_ (Type of Election)  
Election on \_\_\_\_\_ in the State of \_\_\_\_\_  
X Thirtieth day report following the General Election  
on November 2 in the State of open  
Termination Report

(b) Is this Report an Amendment?  
YES X NO

## SUMMARY

| This Period   |                          | Calendar Year to Date |
|---|--------------------------|-----------------------|
| 5. Ending Period  | 10/1/82 Through 11/22/82 |                       |
| 6. (a) Cash on Hand January 1, 1982   |                          | \$ 2991.11            |
| (b) Cash on Hand at Beginning of Reporting Period                                   | \$ 16068.80              |                       |
| (c) Total Receipts (from Line 18)   | \$ 501.00                | \$ 29936.13           |
| (d) Sectional (add Lines 6(a) and 6(c) for Column A and 6(a) and 6(c) for Column B) | \$ 16569.80              | \$ 32927.24           |
| 7. Total Disbursements (from Line 28)   | \$ 0                     | \$ 16357.44           |
| 8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))            | \$ 16569.80              | \$ 16569.80           |
| 9. Disbursements Owed To the Committee (from Part of Schedule C, Schedule D)        | \$ 0                     |                       |
| 10. Disbursements Owed By the Committee (from Part of Schedule C, Schedule D)       | \$ 1000.00               |                       |

1. The above information is being furnished to you for your information only and is not to be used for any other purpose.

For further information contact

Congressman Louis Stokes

Federal Election Commission  
 Washington, D.C. 20543-9530  
 (202) 693-4258

12/1/92

NOTE: This report is the property of the U.S. Government and is loaned to your agency; it and its contents are not to be distributed outside your agency. Report to the Director of F.U.S.C. 5437a.

1. The first step is to identify the problem or question that needs to be answered. This involves understanding the context and the specific requirements of the task.

\* CC FORM 12-13-80

EXH. 7



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

| Name of Committee for Full<br><b>Congressional Black Caucus Political Action Com.</b>        |  | Report Covering the Period<br>From <b>10/1</b> to <b>11/22/82</b> |   |
|--|--|---|---|
|  |  | <b>COLUMN A<br/>Total This Period</b>                             | <b>COLUMN B<br/>Calendar Year to Date</b> |
| <b>I. RECEIPTS</b>   |  |   |   |
| <b>11 CONTRIBUTIONS (other than loans) FROM</b>  |  |   |   |
| (a) Individuals (Persons Other Than Political Committees)                                    |  | <b>401.00</b>   | <b>16740.27</b>                           |
| (b) Political Party Committees   |  | <b>0</b>  | <b>0</b>                                  |
| (c) Other Political Committees   |  | <b>100.00</b>   | <b>10895.00</b>                           |
| <b>(11) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)</b>                    |  | <b>501.00</b>   | <b>27635.27</b>                           |
| <b>12 TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES</b>                                   |  | <b>0</b>  | <b>0</b>                                  |
| <b>13 ALL LOANS RECEIVED</b>   |  | <b>0</b>  | <b>2000.00</b>                            |
| <b>14 LOAN REPAYMENTS RECEIVED</b>   |  | <b>0</b>  | <b>0</b>                                  |
| <b>15 OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)</b>                         |  | <b>0</b>  | <b>0</b>                                  |
| <b>16 REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b> |  | <b>0</b>  | <b>0</b>                                  |
| <b>17 OTHER RECEIPTS (Dividends, Interest, etc.)</b>   |  | <b>0</b>  | <b>300.86</b>                             |
| <b>18 TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)</b>                                |  | <b>501.00</b>   | <b>29936.13</b>                           |
| <b>II. DISBURSEMENTS</b>   |  |   |   |
| <b>19 OPERATING EXPENDITURES</b>   |  | <b>0</b>  | <b>12857.44</b>                           |
| <b>20 TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES</b>                                     |  | <b>0</b>  | <b>0</b>                                  |
| <b>21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b>                 |  | <b>0</b>  | <b>1500.00</b>                            |
| <b>22 CONTRIBUTION EXPENDITURES (See Schedule E)</b>   |  | <b>0</b>  | <b>0</b>                                  |
| <b>23 CONTRIBUTIONS TO FEDERAL CANDIDATES MADE BY PARTY COMMITTEES (See Schedule F)</b>      |  | <b>0</b>  | <b>0</b>                                  |
| <b>24 LOAN REPAYMENTS MADE</b>   |  | <b>0</b>  | <b>1000.00</b>                            |
| <b>25 GRANTS MADE</b>  |  | <b>0</b>  | <b>0</b>                                  |
| <b>26 REFUNDS OF CONTRIBUTIONS TO</b>  |  |   |   |
| (a) Individuals (Persons Other Than Political Committees)                                    |  | <b>0</b>  | <b>0</b>                                  |
| (b) Political Party Committees   |  | <b>0</b>  | <b>0</b>                                  |
| (c) Other Political Committees   |  | <b>0</b>  | <b>1000.00</b>                            |
| <b>(26) TOTAL OF REFUNDS (Add 26a, 26b and 26c)</b>  |  | <b>0</b>  | <b>1000.00</b>                            |
| <b>27 NET DISBURSEMENTS</b>  |  | <b>0</b>  | <b>0</b>                                  |
| <b>28 TOTAL DISBURSEMENTS (Add 19, 20, 21, 22, 23, 24, 25 and 27)</b>                        |  | <b>0</b>  | <b>16357.44</b>                           |
| <b>III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES</b>                                 |  |   |   |
| <b>29 TOTAL CONTRIBUTIONS (other than loans) (from Line 11)</b>                              |  | <b>501.00</b>   | <b>27635.27</b>                           |
| <b>30 TOTAL DISBURSEMENTS (from Line 28)</b>   |  | <b>0</b>  | <b>1000.00</b>                            |
| <b>31 NET CONTRIBUTIONS (other than loans) (Subtract 30 from 29)</b>                         |  | <b>501.00</b>   | <b>26635.27</b>                           |
| <b>32 TOTAL OPERATING EXPENDITURES (from Line 19)</b>  |  | <b>0</b>  | <b>12857.44</b>                           |
| <b>33 OFFSETS TO OPERATING EXPENDITURES (from Line 15)</b>                                   |  | <b>0</b>  | <b>0</b>                                  |
| <b>34 NET OPERATING EXPENDITURES (Subtract 33 from 32)</b>                                   |  | <b>0</b>  | <b>12857.44</b>                           |

8-4040460560

## ITEMIZED RECEIPTS

Page 1 of 1  
Last Name: [REDACTED]  
This document is intended for use  
only by the [REDACTED]  
Library of Congress

Name of Contributor (in Full)

**Congressional Black Caucus 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>Inhotep Fund</b><br><b>1621 East 120th Street</b><br><b>Los Angeles, CA 90059</b>   |  | n/a              | 10/1/82                          | 100.00                             |
| Receipt For <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify) |  | Occupation n/a   | Aggregate Year-to-Date \$ 100.00 |                                    |
| 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 <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> 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<br><input type="checkbox"/> 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<br><input type="checkbox"/> 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<br><input type="checkbox"/> 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<br><input type="checkbox"/> 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<br><input type="checkbox"/> Other (specify)            |  |                  |                                  |                                    |
| <b>SUBTOTAL All Receipts This Period (optional)</b>  |  | 100.00           |                                  |                                    |
| <b>TOTAL This Period (fill in with the four number entry)</b>  |  | 100.00           |                                  |                                    |



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

**LOANS**

Form 1041  
1980  
Use separate schedules  
for each numbered line

Name of Committee (in Full)  
**Congressional Black Caucus Political Action Committee**

| A. Full Name, Mailing Address and ZIP Code of Loan Source   | Original Amount of Loan | Cumulative Payments To Date | Balance Outstanding at Close of This Period |
|---|-------------------------|-----------------------------|---|
| <b>Julian C. Dixon, Democrat for Congress</b><br><b>1581 Roxbury Drive</b><br><b>Los Angeles, CA 90035</b><br>Election: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) | <b>1000.00</b>          | <b>- 0 -</b>                | <b>1000.00</b>                              |
| Terms: <b>1/29/82</b> Date Due: <b>open</b>   | Interest Rate: <b>0</b> | Secured: <b></b>            |   |

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 Payments To Date | Balance Outstanding at Close of This Period |
|--|-------------------------|-----------------------------|---|
| Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) |                         |                             |   |
| Terms: <input type="checkbox"/> Secured <input type="checkbox"/> Unsecured Date Due                                  | Interest Rate           | 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 (Total of this Page Summary)

TOTALS (Total of all pages in this summary)

1000.00

Every outstanding balance entry to LINE 2, Schedule C, for this line. If on Schedule C, carry forward to appropriate line of Summary.

84040460562



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

(Summary Page)

RECEIVED A. THE FEC

03 JAN 81 11:40

ALIGN AREA

ALIGN AREA

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

**Congressional Black Caucus Political Action Committee**

**Address Number and Street**

**PO Box 2006**

**City, State and ZIP Code**

**Washington, D.C. 20013**

☐ Check here if address is different than previously reported.

**2. FEC Identification Number**

**097683**

☐ This committee qualified as a multi-candidate committee during this reporting period on \_\_\_\_\_

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

☐ April 15 Quarterly Report ☐ October 15 Quarterly Report

☐ July 15 Quarterly Report ☒ January 31 Year End Report

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

☐ Monthly Report for \_\_\_\_\_

☐ Twelfth day report preceding \_\_\_\_\_ (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

**PERIOD**

**5. Covering Period** 11/23/82 through 12/31/82

**6. (a) Cash on hand January 1, 1982** \$2991.11

**(b) Cash on Hand at Beginning of Reporting Period** \$16569.80

**(c) Total Receipts (From Line 10)** \$0

**(d) Subtotal (Add Lines 6(a) and 6(b) for Column A and Lines 6(b) and 6(c) for Column B)**

**(e) Total Disbursements (From Line 20)** \$250.00

**(f) Cash on Hand at Close of Reporting Period (Subtract Line 7 from Line 6(d))** \$16319.80

**(g) Total of Other Assets (From Schedule C or Schedule D)** \$0

**(h) Total of Other Liabilities (From Schedule C or Schedule D)** \$1000.00

**(i) Total of Other Assets and Liabilities (Add Lines 7 and 8 of this Schedule)**

**COLUMN A  
This Period**

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

**\$ 2991.11**

**\$ 16569.80**

**\$ 0**

**\$ 16569.80**

**\$ 250.00**

**\$ 16319.80**

**\$ 0**

**\$ 1000.00**

For Further Information Contact:

Federal Election Commission

Two Case Office 10750

Washington, D.C. 20543

**1/27/83**

Date

Signature of the person signing this report in the name of the committee.

Signature of the person signing this report in the name of the committee.

FEC FORM 28 (1982)

EXH. 8

**DETAILS - SUMMARY PAGE  
of Receipts and Disbursements  
Form 2800 (FORM 280)**

Name of Committee or Club

**Congressional Black Caucus Political Action Comm.**

Report covering the Period

From **11/23/82** To **12/31/82**

|  | COLUMN A<br>Total This Period | COLUMN B<br>Calendar Year-To-Date |       |
|--|-------------------------------|-----------------------------------|-------|
| <b>I. RECEIPTS</b>   |                               |                                   |       |
| 11. CONTRIBUTIONS (other than found funds):  |                               |                                   |       |
| (a) Individuals/Persons Other Than Political Committees                                | 0                             | 16740.27                          | 11(a) |
| Name Every Unincorporated <u>0</u>   |                               |                                   |       |
| (b) Political Party Committees   | 0                             | 0                                 | 11(b) |
| (c) Other Political Committees   | 0                             | 10895.00                          | 11(c) |
| (d) TOTAL CONTRIBUTIONS (other than found funds) (Add 11(a), 11(b) and 11(c))          | 501.00                        | 27635.27                          | 11(d) |
| 12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES                                   | 0                             | 0                                 | 12    |
| 13. ALL LOANS RECEIVED   | 0                             | 2000.00                           | 13    |
| 14. LOAN REPAYMENTS RECEIVED   | 0                             | 0                                 | 14    |
| 15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)                         | 0                             | 0                                 | 15    |
| 16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES | 0                             | 0                                 | 16    |
| 17. OTHER RECEIPTS (Dividends, Interest, etc.)   | 0                             | 300.86                            | 17    |
| 18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)                              | 0                             | 28236.13                          | 18    |
| <b>II. DISBURSEMENTS</b>   |                               |                                   |       |
| 19. OPERATING EXPENDITURES   | 250.00                        | 13107.44                          | 19    |
| 20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES                                     | 0                             | 0                                 | 20    |
| 21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES                 | 0                             | 0                                 | 21    |
| 22. CONTRIBUTIONS TO STATE AND LOCAL POLITICAL COMMITTEES (See Schedule E)             | 0                             | 0                                 | 22    |
| 23. CONTRIBUTIONS TO STATE AND LOCAL POLITICAL PARTY COMMITTEES (See Schedule F)       | 0                             | 0                                 | 23    |
| 24. CONTRIBUTIONS MADE   | 0                             | 1000.00                           | 24    |
| 25. LOANS MADE   | 0                             | 0                                 | 25    |
| 26. REIMBURSEMENT OF CONTRIBUTIONS TO  |                               |                                   |       |
| (a) Individuals/Persons Other Than Political Committees                                | 0                             | 0                                 | 26(a) |
| (b) Political Party Committees   | 0                             | 0                                 | 26(b) |
| (c) Other Political Committees   | 0                             | 1000.00                           | 26(c) |
| 27. TOTAL CONTRIBUTION REIMBURSEMENTS (Add 26(a), 26(b) and 26(c))                     | 0                             | 1000.00                           | 27    |
| 28. OTHER DISBURSEMENTS  | 0                             | 0                                 | 28    |
| 29. TOTAL DISBURSEMENTS (Add 19, 20, 21, 22, 23, 24, 25, 27 and 28)                    | 250.00                        | 16607.44                          | 29    |
| <b>III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES</b>                           |                               |                                   |       |
| 30. TOTAL CONTRIBUTIONS (other than found funds) from Line 11(d)                       | 0                             | 27635.27                          | 30    |
| 31. TOTAL CONTRIBUTION REIMBURSEMENTS from Line 27(d)                                  | 0                             | 1000.00                           | 31    |
| 32. NET CONTRIBUTIONS (other than found funds) (Subtract Line 31 from Line 30)         | 0                             | 26635.27                          | 32    |
| 33. TOTAL OPERATING EXPENDITURES from Line 19  | 250.00                        | 13107.44                          | 33    |
| 34. OFFSETS TO OPERATING EXPENDITURES from Line 15                                     | 0                             | 0                                 | 34    |
| 35. NET OPERATING EXPENDITURES (Subtract Line 34 from Line 33)                         | 250.00                        | 13107.44                          | 35    |



**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

Page 1 of 1  
 Last Name  
 This schedule is to be  
 attached to the Federal  
 Summary Page

Any information copied from such Reports and Documents 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 persons.

Name of Committee (in Full)

**Congressional Black Caucus Political Action Committee**

|  |   |   |   |
|--|---|---|---|
| <p><b>A. Full Name, Mailing Address and ZIP Code</b></p> <p>Anise Jenkins <i>any day? office</i><br/>                 2470 Rayburn HOB<br/>                 Washington, D.C. 20515</p> | <p><b>Purpose of Disbursement</b><br/>                 bookkeeping &amp; accounting<br/>                 after working hours</p> <p>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br/> <input type="checkbox"/> Other (specify):</p> | <p><b>Date (month, day, year)</b></p> <p>11/29/82</p> | <p><b>Amount of Each Disbursement This Period</b></p> <p>250.00</p> |
| <p><b>B. Full Name, Mailing Address and ZIP Code</b></p>   | <p><b>Purpose of Disbursement</b></p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/> <input type="checkbox"/> Other (specify):</p>   | <p><b>Date (month, day, year)</b></p>                 | <p><b>Amount of Each Disbursement This Period</b></p>               |
| <p><b>C. Full Name, Mailing Address and ZIP Code</b></p>   | <p><b>Purpose of Disbursement</b></p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/> <input type="checkbox"/> Other (specify):</p>   | <p><b>Date (month, day, year)</b></p>                 | <p><b>Amount of Each Disbursement This Period</b></p>               |
| <p><b>D. Full Name, Mailing Address and ZIP Code</b></p>   | <p><b>Purpose of Disbursement</b></p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/> <input type="checkbox"/> Other (specify):</p>   | <p><b>Date (month, day, year)</b></p>                 | <p><b>Amount of Each Disbursement This Period</b></p>               |
| <p><b>E. Full Name, Mailing Address and ZIP Code</b></p>   | <p><b>Purpose of Disbursement</b></p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/> <input type="checkbox"/> Other (specify):</p>   | <p><b>Date (month, day, year)</b></p>                 | <p><b>Amount of Each Disbursement This Period</b></p>               |
| <p><b>F. Full Name, Mailing Address and ZIP Code</b></p>   | <p><b>Purpose of Disbursement</b></p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/> <input type="checkbox"/> Other (specify):</p>   | <p><b>Date (month, day, year)</b></p>                 | <p><b>Amount of Each Disbursement This Period</b></p>               |
| <p><b>G. Full Name, Mailing Address and ZIP Code</b></p>   | <p><b>Purpose of Disbursement</b></p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/> <input type="checkbox"/> Other (specify):</p>   | <p><b>Date (month, day, year)</b></p>                 | <p><b>Amount of Each Disbursement This Period</b></p>               |
| <p><b>H. Full Name, Mailing Address and ZIP Code</b></p>   | <p><b>Purpose of Disbursement</b></p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/> <input type="checkbox"/> Other (specify):</p>   | <p><b>Date (month, day, year)</b></p>                 | <p><b>Amount of Each Disbursement This Period</b></p>               |
| <p><b>I. Full Name, Mailing Address and ZIP Code</b></p>   | <p><b>Purpose of Disbursement</b></p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/> <input type="checkbox"/> Other (specify):</p>   | <p><b>Date (month, day, year)</b></p>                 | <p><b>Amount of Each Disbursement This Period</b></p>               |

**GRAND TOTAL of Disbursements This Page (continued)**

250.00

**TOTAL This Period (see page one for number only)**

250.00

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FD-502 (Rev. 5-22-64)

LOANS

1-10  
The amount of the loan is \$1000.00

| Name of Lender to Pay<br>Congressional Black Caucus Political Action Committee   |  |   |  |
|--|--|---|--|
| A. Full Name, Mailing Address and ZIP Code of Loan Recipient<br><b>Julian C. Dixon, Democrat for Congress</b><br><b>1901 Roxbury Drive</b><br><b>Los Angeles, CA 90035</b><br>Election: Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify): |  | Original Amount of Loan<br><b>1000.00</b> | Contribution Payment To Date<br><b>- 0 -</b> |
| Balance Outstanding (Start of This Period)<br><b>1000.00</b>   |  |   |  |
| Terms: Due Received <u>1/29/82</u> Date Due <u>02/82</u> Interest Rate <u>0</u> (Specify) <input type="checkbox"/> Secured   |  |   |  |
| List All Employers or Sources (if any) to Item A   |  |   |  |
| 1. Full Name, Mailing Address and ZIP Code   |  | Name of Employer                          |  |
|  |  | Occupation                                |  |
|  |  | Amount Guaranteed Outstanding<br>\$       |  |
| 2. Full Name, Mailing Address and ZIP Code   |  | Name of Employer                          |  |
|  |  | Occupation                                |  |
|  |  | Amount Guaranteed Outstanding<br>\$       |  |
| 3. Full Name, Mailing Address and ZIP Code   |  | Name of Employer                          |  |
|  |  | Occupation                                |  |
|  |  | Amount Guaranteed Outstanding<br>\$       |  |
| B. Full Name, Mailing Address and ZIP Code of Loan Recipient   |  | Original Amount of Loan                   | Contribution Payment To Date                 |
| Balance Outstanding (Start of This Period)   |  |   |  |
| Election: Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify):   |  |   |  |
| Terms: Due Received _____ Date Due _____ Interest Rate _____ (Specify) <input type="checkbox"/> Secured  |  |   |  |
| List All Employers or Sources (if any) to Item B   |  |   |  |
| 1. Full Name, Mailing Address and ZIP Code   |  | Name of Employer                          |  |
|  |  | Occupation                                |  |
|  |  | Amount Guaranteed Outstanding<br>\$       |  |
| 2. Full Name, Mailing Address and ZIP Code   |  | Name of Employer                          |  |
|  |  | Occupation                                |  |
|  |  | Amount Guaranteed Outstanding<br>\$       |  |
| 3. Full Name, Mailing Address and ZIP Code   |  | Name of Employer                          |  |
|  |  | Occupation                                |  |
|  |  | Amount Guaranteed Outstanding<br>\$       |  |
| SUBTOTALS This Period (This Page Total only)   |  |   |  |
| TOTALS This Period (See page 4 of this form only)  |  |   |  |
| Carry over to page 4 of this form. If on Schedule D, carry forward to appropriate line of Schedule D.  |  |   |  |

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U.S. HOUSE OF REPRESENTATIVES

POSTAGE WILL BE PAID BY ADDRESSEE

U.S. POSTAL SERVICE

JAN 28 1983

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WASHINGTON DC 20540



Federal Election Commission

Paul

1325 K St, NW





33 MAR 21 AM : 30

**Congressional Black Caucus  
Political Action Committee**

**March 16, 1983**

William W. Gray, Chairman  
George H. Gray, Vice Chairman  
Louis Baker, Treasurer  
Organized West Coast Builders  
Walter S. Pearson, Chairman  
Stacy A. Giddens  
William W. Gray  
Cecil Baker  
John Corbett  
George W. Corbett, Jr.  
Donald V. Baker  
John C. Baker  
George H. Gray  
Walter S. Pearson  
William S. Gray, Jr.  
Lawrence F. Giddens  
Murray Baker  
George S. Baker  
Charles E. Baker  
Louis Baker  
Donald W. Baker

Mark John Davis  
Director of Congressional,  
Legislative and Intergovernmental Affairs  
Federal Election Commission  
1325 K Street, NW  
Washington, DC 20463

Page 18

This letter is to notify the Federal Election Commission that the  
as of the date of this letter, March 16, 1983, the Congressional  
Black Caucus Political Action Committee has met all the requirements  
as described in the Code of Federal Regulations section 100.5 (d)(3)  
for a self-nominating committee; also appearing under section  
101.10 (a) in the Federal Code.

It is noted that, on date of receipt of this modification and  
this modification is accordingly.

2102

1990

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EXH. 9



RECEIVED  
GENERAL COUNSEL

CERTIFICATE

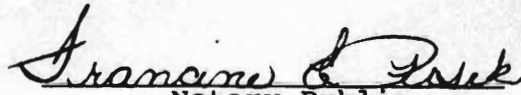
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Washington, )  
 )  
District of Columbia ) SS

Pursuant to 2 U.S.C. §437g(a)(1), I hereby swear under the penalty of perjury that the charges and information submitted are made upon personal knowledge and where indicated, on information and belief. This complaint was not filed at the request or suggestion of any candidate.

  
Paul D. Kamenar

Subscribed and sworn to before me this 6th day of May, 1983.

  
Notary Public  
MY COMMISSION EXPIRES  
JULY 14, 1986

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WASHINGTON LEGAL FOUNDATION  
1612 K STREET, N. W.  
SUITE 502  
WASHINGTON, D. C. 20006  
202-857-0240

RECEIVED AT THE FBI

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Chamman

FEL

1325 K ST. NW

DC



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

May 11, 1983

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

**Congressional Black Caucus PAC**  
**P.O. Box 2006**  
**Washington, D.C. 20013**

**Re: MUR 1550**

Dear Sir/Madam:

This letter is to notify you that on May 6, 1983, the Federal Election Commission received a complaint which alleges that your organization may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1550. Please refer to this number in all future correspondence.

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

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

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

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

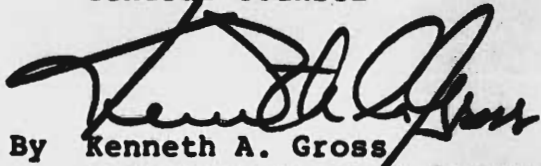
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If you have any questions, please contact Lee Andersen, the staff attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele  
General Counsel

  
By Kenneth A. Gross  
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

1550 5/10

© SENDER: Complete items 1, 2, 3, and 4.  
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one):

- ☐ Show to whom and date delivered \_\_\_\_\_
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- ☐ RESTRICTED DELIVERY  
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$ \_\_\_\_\_

2. ARTICLE ADDRESSED TO:  
Cong. Black Caucus PAC  
Washington, D.C. 11111

3. TYPE OF SERVICE:

- ☐ REGISTERED ☐ INSURED
- ☐ CERTIFIED ☐ COD
- ☐ RETURN MAIL

ARTICLE NUMBER  
993288

(Always obtain signature of addressee or agent)

I have received the article described above:

SIGNATURE ☒ Addressee ☐ Authorized agent

DATE OF DELIVERY

4. ADDRESSEE'S ADDRESS (Only if required)

5. RETURN TO DELIVER TO:

WASHINGTON MAY 12 1983



**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

May 11, 1983

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

**Congressional Black Caucus**  
**H2-344 House Annex #2**  
**Washington, D.C. 20515**

**Re: MUR 1550**

Dear Sir/Madam:

This letter is to notify you that on May 6, 1983, the Federal Election Commission received a complaint which alleges that your organization may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1550. Please refer to this number in all future correspondence.

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

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

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

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

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If you have any questions, please contact Lee Andersen, the staff attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele  
General Counsel

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

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

1556 516

RETURN TO: [ ]  
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POSTAGE: [ ]  
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SEND TO: [ ]  
Add your address in the space on reverse.

(CONSULT POSTMASTER FOR FORM)

1. The following service is requested (check one):

- ☐ Show to whom and date delivered
- ☐ Show to whom, date, and address of delivery

2. ☐ RESTRICTED DELIVERY  
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$

3. ARTICLE ADDRESSED TO:  
Cong. Black Caucus  
Wash., D.C.

4. TYPE OF SERVICE:

- ☐ REGISTERED ☐ SIGNED
- ☐ CERTIFIED ☐ COD
- ☐ RETURNED MAIL

ARTICLE NUMBER: 6902

(Signature of addressee or agent)  
I have received the article described above.

SIGNATURE: [Signature] ADDRESS: [ ] AUTHORIZED AGENT: [ ]

DATE OF DELIVERY: 11/13/81

POSTMAN'S ADDRESS (if any):

7. UNABLE TO DELIVER REASON:

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

May 11, 1983

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Honorable Louis Stokes  
2465 Rayburn House Office Building  
Washington, D.C. 20515

Re: MUR 1550

Dear Congressman Stokes:

This letter is to notify you that on May 6, 1983, the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1550. Please refer to this number in all future correspondence.

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

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

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

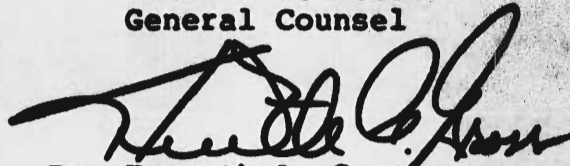
If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

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If you have any questions, please contact Lee Andersen, the staff attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele  
General Counsel



By Kenneth A. Gross  
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

1550 5/6

U.S. MAIL PERMIT NO. 1000 WASHINGTON, D.C. 20540

1. The following service is requested (check one):

☐ Show to whom and date delivered \_\_\_\_\_

☐ Show to whom, date, and address of delivery \_\_\_\_\_

2. ☐ RESTRICTED DELIVERY  
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$ \_\_\_\_\_

2. ARTICLE ADDRESSED TO:  
Cong. Doherty  
BHOB - Wash. D.C.

3. TYPE OF SERVICE:

☐ REGISTERED ☐ REGISTERED MAIL  
☒ CERTIFIED ☐ CERTIFIED MAIL  
☐ RETURN RECEIPT MAIL

ARTICLE NUMBER  
PBCE46

(Always obtain signature of addressee or agent)  
I have received the article described above.

SIGNATURE ☐ ADDRESS ☐ AUTHORIZED AGENT

J. C. Gross

4. ADDRESSEE'S ADDRESS (P.O. Box or Street Address)

7. USE THIS SPACE FOR RETURN RECEIPT

U.S. MAIL PERMIT NO. 1000 WASHINGTON, D.C. 20540



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

May 11, 1983

Mr. Robert C. Heckman  
Chairman  
Fund For A Conservative Majority  
302 Fifth Street, NE  
Washington, D.C. 20002

Dear Mr. Heckman:

This letter is to acknowledge receipt of your complaint which we received on May 6, 1983, against the Congressional Black Caucus and the Congressional Black Caucus PAC which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this office. We suggest that this information be sworn to in the same manner as your original complaint. For your information, we have attached a brief description of the Commission's procedure for handling complaints. If you have any questions, please contact Steven Barndollar at (202) 523-4073.

Sincerely,

Charles N. Steele  
General Counsel

By Kenneth A. Gross  
Associate General Counsel

Enclosure

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FUND FOR A CONSERVATIVE MAJORITY

RECEIVED AT THE F  
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MAY 6  
ROBERT C. HECKMAN  
CHIEF OF STAFF  
28

May 3, 1983

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

Dear Sir:

This letter constitutes a complaint filed pursuant to 2 U.S.C. §437g and 11 C.F.R. 111.4 against Congressional Black Caucus, H2-344 House Annex #2, Washington, D.C., 20515 ("CBC") and Congressional Black Caucus Political Action Committee, P.O. Box 2006, Washington, D.C., 20013 ("CBCPAC").

Based upon the documents attached hereto, it appears that CBC and CBCPAC may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended, in the following particulars:

1. CBC appears to be a connected organization of CBC PAC, as defined at 2 U.S.C. §431(7). CBC appears to have established CBCPAC, and apparently administers and/or financially supports that Committee. CBC is not a registered political committee. CBCPAC registered as a political committee with the Federal Election Commission ("the Commission") on December 3, 1981, pursuant to 2 U.S.C. §433.

Enclosed as Attachment 1 is a list of the members of the Congressional Black Caucus in the 98th Congress. Attachment 2 is a copy of a fund-raising solicitation, dated April 14, 1983, from a group calling itself "CBC-Political Action Committee." On information and belief, CBCPAC and CBC-Political Action Committee are the same political committee. All of the members of the CBC-Political Action Committee are also listed as members of CBC on Attachment 1. Thus it appears that CBC established CBCPAC.

The address listed by the Committee on Attachment 2 reportedly does not exist. Enclosed as Attachment 3 is a copy of an article that appeared in The Washington Post on May 2, 1983,

84040160578

General Counsel  
May 5, 1983  
Page Two

in which it is reported that the "Suite 600, 200 C Street., S.E.," in Washington, D.C., the address used by CBCPAC, is non-existent. Thus, because CBCPAC's solicitation of funds lists a fictitious address for the Committee, it can be inferred that CBC also administers and/or financially supports CBCPAC from CBC's offices.

As further evidence that CBC is a connected organization of CBCPAC, and that CBCPAC is a separate segregated fund of CBC, CBCPAC's full name, as registered with the Commission, includes the name of its connected organization, as required by 2 U.S.C. §432(5).

If CBC is a connected organization of CBCPAC, then CBCPAC has committed a violation of 2 U.S.C. §433(b) and 11 C.F.R. 102.2(a)(ii), in that it has failed to list CBC as its connected organization, and has failed to disclose that it is a separate segregated fund of CBC. Moreover, if CBCPAC is a separate segregated fund of CBC, then Attachment 2 is evidence that both groups may have violated 2 U.S.C. §441b(4), in that CBCPAC, a separate segregated fund established by CBC, a membership organization, has solicited contributions from persons other than members of CBC.

2. CBCPAC's April 14, 1983 solicitation of contributions (Attachment 2) does not contain the disclaimer required by 2 U.S.C. §441d and 11 C.F.R. 110.11(a)(1)(iv).

3. In its Statement of Organization, filed December 3, 1981, (enclosed as Attachment 4), CBCPAC reported that William L. Clay was its treasurer. However, CBCPAC's first Report of Receipts and Expenditures for the period December 3 - December 31, 1981 (Attachment 5), shows Mr. Clay as treasurer, but it does not bear his signature, as required by 2 U.S.C. §434(a). Instead, that Report is signed by "Jerome M. Williams," who is not further identified.

---

\*/ An analysis of the reports of receipts and disbursements filed with the Commission by CBCPAC indicates that CBCPAC has incurred few, if any, administrative expenses which are normally incurred and paid by independent political committees.

84040160579

General Counsel  
May 5, 1983  
Page Three

4. Attachment 6 is a copy of CBCPAC's Report of Receipts and Expenditures for the period April 1 - June 30, 1982. That Report bears the name of Congressman Louis Stokes as Treasurer of CBCPAC, rather than William L. Clay. On information and belief, CBCPAC did not file an amendment to its Statement of Organization reporting that change, as required by 2 U.S.C. §433(c).

5. Schedule A, Itemized Receipts, filed with the Commission as part of Attachment 6 lists as contributors entities or organizations which may not lawfully contribute to CBCPAC. For instance, pages 2, 3 and 4 of 1 (sic) show contributions received from organizations identified as "Black Affairs, Inc.," "Industrial Unit Division - AFL-CIO," "Association of Black Women Attorneys," "Bullock Washateria & Food Mart" and other organizations, associations and churches, some of which appear to be incorporated and others of which appear not to be registered political committees, in apparent violation of 11 C.F.R. 110.9(a) and 114.2(c).

6. Attachment 7, Report of Receipts and Expenditures for the period July 1 - September 30, 1982, like Attachment 6, also reflects contributions received by CBCPAC from entities in apparent violation of 11 C.F.R. 110.9(a) and 114.2(c). Attachment 7 also contains an inconsistency when compared with CBCPAC filings prior and subsequent to Attachment 7. The purported signature of Congressman Louis Stokes on Attachment 7 is distinguishably different from the signatures appearing on Attachment 6 and on Reports filed by CBCPAC on December 1, 1982 and January 27, 1983 (Attachments 8 and 9). In addition to the apparent failure by CBCPAC to amend its Statement of Organization to reflect the change in its treasurer, it also appears that at least one of the Reports was not actually signed by CBCPAC's treasurer, in violation of 2 U.S.C. §434(a)(1).

In addition, Attachment 7 does not include an itemized statement detailing the source of "other receipts" listed at page 2, Detailed Summary Page, as required by 11 C.F.R. §104.3(a)(2)(viii).

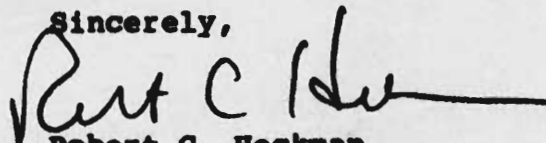
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General Counsel  
May 5, 1983  
Page Four

The Commission is requested to investigate these matters and to take appropriate action in accordance with 2 U.S.C. §437g and C.F.R. 111.5 et seq.

Sincerely,



Robert C. Heckman  
Chairman  
Fund for a Conservative  
Majority

enclosures

Sworn to before me this 6<sup>th</sup> day of May, 1983.

  
Notary Public

My Commission Expires:

My Commission Expires April 14, 1986



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CONGRESSIONAL BLACK CAUCUS  
H2-344 House Annex #2  
Washington, D.C. 20515  
(202) 225-1691

CONGRESSIONAL BLACK CAUCUS MEMBERS  
98TH CONGRESS

Hon. Julian C. Dixon, Chairman  
Democrat (28th District-CA)  
423 Cannon House Office Bldg.  
Washington, D.C. 20515  
(202) 225-7084

Hon. Mickey Leland  
Vice Chairman for Administration  
Democrat (18th District-TX)  
419 Cannon House Office Bldg.  
Washington, D.C. 20515  
(202) 225-3816

Hon. William H. Gray, III  
Vice Chairman for Legislation  
Democrat (2nd District-PA)  
204 Cannon House Office Bldg.  
Washington, D.C. 20515  
(202) 225-4001

Hon. Harold Washington, Treasurer  
Democrat (1st District-IL)  
426 Cannon House Office Bldg.  
Washington, D.C. 20515  
(202) 225-4372

Hon. Ed Towns, Secretary  
Democrat (11th District-NY)  
1009 Longworth House Office Bldg.  
Washington, D.C. 20515  
(202) 225-5936

Hon. William L. Clay  
Democrat (1st District-MO)  
2470 Rayburn House Office Bldg.  
Washington, D.C. 20515  
(202) 225-2406

Hon. Cardiss Collins  
Democrat (7th District-IL)  
2264 Rayburn House Office Bldg.  
Washington, D.C. 20515  
(202) 225-5006

Hon. John Conyers, Jr.  
Democrat (1st District-MI)  
2313 Rayburn House Office Bldg.  
Washington, D.C. 20515  
(202) 225-5126

Hon. George W. Crockett, Jr.  
Democrat (13th District-MI)  
1531 Longworth House Office Bldg.  
Washington, D.C. 20515  
(202) 225-2261

Hon. Ronald V. Dellums  
Democrat (8th District-CA)  
2136 Rayburn House Office Bldg.  
Washington, D.C. 20515  
(202) 225-2661

Hon. Mervyn M. Dymally  
Democrat (31st District-CA)  
1717 Longworth House Office Bldg.  
Washington, D.C. 20515  
(202) 225-5425

Hon. Walter E. Fauntroy  
Democrat (District of Columbia)  
2135 Rayburn House Office Bldg.  
Washington, D.C. 20515  
(202) 225-8050

Hon. Harold E. Ford  
Democrat (8th District-TN)  
2305 Rayburn House Office Bldg.  
Washington, D.C. 20515  
(202) 225-3265

Hon. Katie Hall  
Democrat (1st District-IN)  
132 Cannon House Office Bldg.  
Washington, D.C. 20515  
(202) 225-2461

Hon. Augustus F. Hawkins  
Democrat (29th District-CA)  
2371 Rayburn House Office Bldg.  
Washington, D.C. 20515  
(202) 225-2201

Hon. Parren J. Mitchell  
Democrat (7th District-MD)  
2367 Rayburn House Office Bldg.  
Washington, D.C. 20515  
(202) 225-4741



Hon. Major Owens  
Democrat (12th District-NY)  
114 Cannon House Office Bldg.  
Washington, D.C. 20515  
(202) 225-6231

Hon. Louis Stokes  
Democrat (21st District-OH)  
2465 Rayburn House Office Bldg.  
Washington, D.C. 20515  
(202) 225-7032

Hon. Charles B. Rangel  
Democrat (19th District-NY)  
2432 Rayburn House Office Bldg.  
Washington, D.C. 20515  
(202) 225-4365

Hon. Alan Wheat  
Democrat (5th District-MO)  
1609 Longworth House Office Bldg.  
Washington, D.C. 20515  
(202) 225-4535

Hon. Gus Savage  
Democrat (2nd District-IL)  
1121 Longworth House Office Bldg.  
Washington, D.C. 20515  
(202) 225-0773

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## CBC-POLITICAL ACTION COMMITTEE

Congressman William "Bill" Clay, Chairman  
 Congressman Mervyn M. Dymally, Vice-Chairman  
 Congressman Louis Stokes, Treasurer

April 14, 1983

### MEMBERS

Congressman William "Bill" Clay  
 Congresswoman Cardiss Collins  
 Congressman John Conyers  
 Congressman George W. Crockett, Jr.  
 Congressman Ronald V. Dellums  
 Congressman Julian C. Dixon  
 Congressman Mervyn M. Dymally  
 Congressman Walter E. Fauntroy  
 Congressman Harold E. Ford  
 Congressman William H. Gray III  
 Congresswoman Katie Hall  
 Congressman Augustus F. Hawkins  
 Congressman Mickey Leland  
 Congressman Parren J. Mitchell  
 Congressman Major A. Owens  
 Congressman Louis Stokes  
 Congressman Edolphus Towns  
 Congressman Harold Washington  
 Congressman Alan Wheat

Mr. Robert Heckman  
 302 Fifth Street, N.E.  
 Washington, DC 20002

Dear Mr. Heckman:

As a Political Action Committee (PAC) official, you should be aware that a major push is now underway to further control and limit the growth of political action committees as we know them. This move must not be taken lightly. The CBC-PAC is currently mounting a campaign designed to acquire support for allowing political action committees to continue to function in their current form, even though we may support some moderate adjustments over the medium and long term.

David E. Greene, Executive Director

HOW MAY YOU HELP? There are two (2) specific ways.

You have surely noticed that our PAC consists entirely of Congressmen. If you are willing to send me a strong letter of support for the continued existence of PACs as we now know them, your letter will definitely be channeled into influential Congressional hands sympathetic to the existing PAC philosophy.

In addition, we are a multicandidate PAC and would appreciate a donation of \$5,000 as soon as possible. We perceive the threat to existing PACs as real even if misdirected and the need for funds to finance candidates who support our position in this matter is essential. If you are unable to send the full amount of \$5,000 at this time, send whatever you can as soon as possible. If, on the other hand, you are unable to send us a contribution now, please send the letter of support. We will use it.

Mr. Heckman, the time has most certainly come upon us when PACs need to wield a unified sword from a position of political and economic strength.

I look forward to meeting you personally and discussing the issues pertinent to your particular membership at your earliest convenience.

Sincerely,

David Greene  
 Executive Director

Enclosure 98



PACs, THE TAXPAYER, AND  
CAMPAIGN FINANCE REFORM

Reproduced with permission from the author; Paul D. Kamemar, director of  
Litigation, Washington Legal Foundation. (Page one of nineteen.)

Introduction

When Walter Mondale formally announced on February 21, 1983, his candidacy for the Democratic nomination for the office of President of the United States, he promised that he would refuse to accept political action committee (PAC) contributions for his campaign. At the same time, he pledged his support for proposals that would extend government financing to all federal elections.

Similar positions taken by Senator Gary Hart and others seem to be the latest response to the steady drumbeat, by groups such as Common Cause and by the media throughout the 1983 elections, against PACs and their alleged pernicious effects on the electoral process. The claim is that corporate, trade association, and other "special interest" PACs allegedly "buy" the votes of congressmen with contributions for their increasingly expensive campaigns, and that this erodes the confidence of the public in their elected officials.

Special criticism is heaped against those PACs that engage in independent expenditures because such efforts allegedly exploit the "loopholes" in the election law's strict limits on campaign contributions and are made by groups that critics claim are unaccountable to the political system. The solution prescribed for these "problems" is to eliminate or sharply curtail PAC contributions and independent expenditures, and to substitute public financing for congressional and senatorial elections similar to that provided for presidential elections. These proposals introduced in the last Congress, are now being reintroduced in the 98th Congress. Hearings are held before the Senate Rules Committee in late January, and more are expected before that Committee and the House Administration Committee as well as later this spring.

The trouble is that the "reform" proposals largely ignore (1) that PACs in fact play a relatively minor role in financing federal elections; (2) that the source of PAC money is many individuals who share common beliefs and voluntarily pool small contributions; (3) that PAC contributions are fully disclosed whether their elected leaders are voting in the constituents', or some "special," interest; (4) that the so-called loophole exploited by independent expenditures is nothing less than the First Amendment right of free speech and association; (5) that the great majority of the American public opposes taxpayer financing of elections; and (6) that more regulation will only increase the power of the Federal Election Commission, a bureaucracy that has consistently trampled upon basic rights and freedoms, the latest example of which, discussed briefly herein, are proposed FEC regulations sent to Congress for its consideration on March 1, 1983, which, if not vetoed, would seriously limit the rights of corporations and expand those of unions.

It might well be healthier for the electoral process and more in the public interest not to curtail PACs and private contributions. Instead, the political process should be opened further to encourage more direct citizen involvement in democracy's fundamental function: the selection of its leaders.

This enclosure is for information purposes only and its inclusion does not necessarily indicate an acceptance of the author's views by the CBC-PAC.

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## Black Caucus Seen Favoring, Fighting Bill to Curb PACs

By George Lardner Jr.  
Washington Post Staff Writer

Three weeks ago today, Rep. David R. Obey (D-Wis.) and two colleagues announced renewal of their efforts to put a lid on the influence of political action committees and contributions they can make to House candidates.

Three days later, the Congressional Black Caucus-Political Action Committee sent a letter signed by its executive director, David Greene, to officials of other PACs. It warned that "a major push is now under way to further control and limit the growth of political action committees as we now know them."

"This move must not be taken lightly," the letter said. In it, Greene asked for "a strong letter of support for the continued existence of PACs as we now know them" and "a donation of \$5,000 as soon as possible" to help counter the threat.

The request has been criticized for several reasons, not the least of which is that several caucus members—including Rep. William L. Clay (D-Mo.), CBC-PAC chairman, and Rep. Louis Stokes (D-Ohio), CBC-PAC treasurer—have signed up as co-sponsors of the Obey bill.

The CBC-PAC letter's stationery, which includes the names of all 21 caucus members and the motto, "We have no permanent enemies/We have no permanent friends/Only

See CAUCUS, A8, Col. 1

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# Black Caucus Seen on Both Sides of PAC Bill

CAUCUS, From A1

permanent interests," lists "Suite 600, 200 C St., S.E." as CBC-PAC's address.

"There is no such office, and the building at 200 C St. S.E., which houses a new luxury hotel called the Capitol Hill, stops at the fifth floor. Jonathan Z. Rubin, the hotel's sales and marketing director, said he gave Greene the suite number to use as a mail "drop" in anticipation of his business. "He [Greene] came in about six weeks ago," Rubin said. "He's apparently starting up a PAC, and he needs an office on the Hill. He said a PAC can't be housed in a congressional building.... He said he's going to do business with me."

The hotel's suites cost \$2,100 to \$2,300 a month, more than the CBC-PAC usually took in during 1982, its first full year in business. Rubin said Greene told him a decision on whether the CBC-PAC would rent a suite "would be made by July." Meanwhile, Rubin said, he told Greene to use "Suite 600" for his mail.

Last Friday, as Greene was leaving Clay's office in the Rayburn House Office Building, he refused to say where the CBC-PAC, of which he said he is "full-time" executive director, has its headquarters.

Greene also refused to say whether he had received money as a result of the fund-raising appeal. To most questions, he responded, "No comment. Any information generated on that would have to come from the chairman."

Although the CBC-PAC letter appears to suggest opposition to Obey's "clean campaign act" and to ask for money on that basis, Greene said, "I don't read it that way." Asked how, as its signer, he did read it, he said, "Any comment on that would have to come from the chairman [Clay]."

Clay, formally added to the list of the Obey bill's co-sponsors April 18, could not be reached for comment despite repeated attempts to contact him.

However, Stokes said he "saw it [the letter] before it went out" and saw no inconsistency between it and Obey's bill, which he joined as a co-sponsor last Monday.

Stokes cited a segment of the letter that said: "The CBC-PAC is currently mounting a campaign designed to acquire support for allowing political action committees to continue to function, even though we

**Rep. Louis Stokes  
(D-Ohio) is  
co-sponsoring a bill  
to limit the influence  
of PACs, saying the  
black caucus is  
simultaneously  
promoting PACs  
"even though we may  
support some  
moderate  
adjustment."**



may support some moderate adjustments over the medium and long term."

Said Stokes: "I think that the letter, which was sent out by the executive director of the PAC, makes it clear that we support some form of change with reference to the PAC situation." As for Obey's bill, Stokes said, "I still support it."

Obey's bill, prepared with the self-designated citizens' lobby, Common Cause, would limit to \$50,000 the amount that a House candidate could accept from PACs in a two-year election period and establish partial public financing for congressional campaigns. A semi-monthly newsletter entitled "PACs & Lobbies" described it as an "anti-PAC bill."

In appealing for funds and support, the CBC-PAC letter told other PAC officials that "you have surely noticed that our PAC consists entirely of congressmen" and assured them that their letters of support "will definitely be channeled into influential congressional hands sympathetic to the existing PAC philosophy."

In seeking \$5,000 contributions, the letter added that "we are a multi-candidate PAC.... We perceive the threat to existing PACs as real even if misdirected and the need for funds to finance candidates who support our position in this matter is essential.... PACs need to wield a unified sword from a position of political and economic strength."

Asked how that squared with Obey's bill, Stokes said: "The Obey bill is not yet law. We don't know

whether it will become law or not. The [CBC] PAC is trying to exist under the current situation...."

Asked if the letter is consistent with support for Obey's bill and what "threat" to the PACs was seen by the CBC-PAC, Stokes said, "I don't want to discuss it further. I've answered you the best I can."

Rep. Parren J. Mitchell (D-Md.), added to the list of Obey bill co-sponsors April 20, said he was not aware of the letter and said of Greene, "I don't even think I know him."

Formed in December, 1981, with a post office box for an address, the CBC-PAC notified the Federal Election Commission March 17 that it had qualified as a "multi-candidate committee"—meaning it had been in business for six months, received at least 50 individual contributions and contributed to at least five candidates for federal office.

The achievement, recorded about the time Greene reportedly inquired about a suite at the Capitol Hill, entitled the group for the first time to donate \$5,000, rather than \$1,000, to each candidate in an election.

Two caucus members, Reps. Ronald V. Dellums (D-Calif.) and John Conyers Jr. (D-Mich.), co-sponsored the Obey bill at the outset. They could not be reached for comment about the CBC-PAC letter, although aides to Dellums doubted he knew of Greene's fund-raising pitch.

Del. Walter E. Fauntroy (D-D.C.), a caucus member who is not a sponsor of Obey's bill, could not be reached for comment.

Robert C. Heckman, chairman of

the Fund for a Conservative Majority, received the letter and said he is particularly perplexed by the fact that some caucus members had endorsed Obey's "anti-PAC bill."

"It would be hard for me to conclude anything but the fact that you are trying to solicit money and support in a clearly fraudulent manner," Heckman wrote Greene last Wednesday. He said he intended to complain to the FEC.

Heckman took special exception to the observation in Greene's letter that the CBC-PAC consists entirely of congressmen. "In light of that fact," Heckman wrote, "I find your appeal that much more appalling."

Attached to the fund-raising appeal was a one-page excerpt from a defense of PACs written for the Heritage Foundation by Paul D. Kamenar, litigation director of the conservative Washington Legal Foundation. The CBC-PAC letter said the excerpt was "reproduced with permission from the author, Paul D. Kamenar." Kamenar said he gave no such permission and is demanding a retraction from Greene.

At the other end of the spectrum is Common Cause president Fred Wertheimer, who favors passage of Obey's bill but acknowledges that it faces "a very tough political fight."

"It shows how damaging this PAC system is and how crucial it is to change it," Wertheimer said of the CBC-PAC appeal. "The PAC system is a process that has become as destructive to the institution of the Congress that in some ways, the members themselves have the highest stakes in getting out from under the shadow it casts...."

Despite his reluctance to comment, Greene was more voluble earlier Friday before being approached by a reporter in Clay's office. Responding to an earlier call from another reporter, Greene said several times that he initiated the letter without bringing it to the attention of caucus members. He said he wanted to get a reading from other PACs first.

"It's kind of disappointing," Greene said of Heckman's reaction. "It seems to me he should have called me up, asked to go out to lunch, and said, 'I welcome you joining the free-enterprise system.'"

Staff writer Bill Peterson contributed to this report.

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MAILED DELIVERED

# STATEMENT OF ORGANIZATION

(See reverse side for instructions)

|  |  |  |
|--|--|--|
| 1. (a) Name of Committee (in Full)<br><b>Congressional Black Caucus Political Action Committee (CBC-PAC)</b> | <input type="checkbox"/> Check if name or address is changed | 2. Date<br><b>December 3, 1981</b>   |
| (b) Address (Number and Street)<br><b>Post Office Box 2006</b>   |  | 3. FEC Identification Number<br><b>100 DEC -3 P 3:30 976A3</b>                                       |
| (c) City, State and ZIP Code<br><b>Washington, D. C. 20013</b>   |  | 4. Is this an amended Statement? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |

## 5. TYPE OF COMMITTEE (check one)

- ☐ (a) This committee is a principal campaign committee. (Complete the candidate information below.)
- ☐ (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

|                   |                             |               |                |
|-------------------|-----------------------------|---------------|----------------|
| Name of Candidate | Candidate Party Affiliation | Office Sought | State/District |
|-------------------|-----------------------------|---------------|----------------|

- ☐ (c) This committee supports/opposes only one candidate \_\_\_\_\_ and is NOT an authorized committee.
- ☐ (d) This committee is a \_\_\_\_\_ committee of the \_\_\_\_\_ Party.
- (National, State or subordinate) (Democratic, Republican, etc.)
- ☐ (e) This committee is a separate segregated fund.
- ☒ (f) This committee supports/opposes more than one federal candidate and is NOT a separate segregated fund nor a party committee.

| Name of Any Connected Organization or Affiliated Committee | Mailing Address and ZIP Code | Relationship |
|--|------------------------------|--------------|
| None   |                              |              |

If the registering political committee has identified a "connected organization" above, please indicate type of organization:

- ☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization ☐ Membership Organization ☐ Trade Association ☐ Co-op

7. Custodian of Records: Identify by name, address (phone number - optional) and position, the person in possession of committee books and records.

| Full Name            | Mailing Address and ZIP Code     | Title or Position |
|----------------------|----------------------------------|-------------------|
| Hon. William L. Clay | P. O. Box 2006 Wash, D. C. 20013 | Treasurer         |

8. Treasurer: List the name and address (phone number - optional) of the treasurer of the committee, and the name and address of any deputy (e.g., assistant treasurer).

| Full Name            | Mailing Address and ZIP Code     | Title or Position |
|----------------------|----------------------------------|-------------------|
| Hon. William L. Clay | P. O. Box 2006 Wash, D. C. 20013 | Treasurer         |

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit or maintains funds.

| Name of Bank, Depository, etc.      | Mailing Address and ZIP Code                             |
|-------------------------------------|--|
| Independence Federal Savings & Loan | 1229 Connecticut Avenue, N.W.<br>Washington, D. C. 20036 |

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

William L. Clay

Type or Print Name of Treasurer

*W L Clay*

SIGNATURE OF TREASURER

December 3, 1981

Date

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

For further information contact:

Federal Election Commission, Toll Free 800-424-9630, Local 202-622-4088

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FEC FORM 1

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12/11



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NOT DELIVERED

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

(Summary Page)

1981 JAN 27 5 11:19

|  |   |
|--|---|
| 1. Name of Committee (in Full)<br>Congressional Black Caucus Political<br>Action Committee<br><br>Address (Number and Street)<br><br>P. O. Box 2006<br><br>City, State and ZIP Code<br>Washington, D.C. 20013<br><br><input type="checkbox"/> Check if address is different than previously reported | 4. TYPE OF REPORT (check appropriate boxes)<br>(a) <input type="checkbox"/> April 15 Quarterly Report<br><input type="checkbox"/> July 15 Quarterly Report<br><input type="checkbox"/> October 15 Quarterly Report<br><input checked="" type="checkbox"/> January 31 Year End Report<br><input type="checkbox"/> July 31 Mid Year Report (Non-election Year Only)<br><input type="checkbox"/> Monthly Report for _____<br><input type="checkbox"/> Twelfth day report preceding _____<br>election on _____ in the State of _____<br><input type="checkbox"/> Thirtieth day report following the General Election<br>on _____ in the State of _____<br><input type="checkbox"/> Termination Report<br>(b) Is this Report an Amendment?<br>YES NO |
| 2. FEC Identification Number<br>097683   |   |
| 3. <input checked="" type="checkbox"/> This committee qualified as a multicandidate com-<br>mittee during this Reporting Period on 12/3/81<br>(date)   |   |

| SUMMARY  |                          | Column A<br>This Period | Column B<br>Calendar Year-to-Date |
|--|--------------------------|-------------------------|-----------------------------------|
| 5. Covering Period   | 12/3/81 Through 12/31/81 |                         |                                   |
| 6. (a) Cash on Hand January 1, 1981  |                          |                         | \$ 0                              |
| (b) Cash on Hand at Beginning of Reporting Period  |                          | \$ 0                    |                                   |
| (c) Total Receipts (from Line 18)  |                          | \$ 3010.03              | \$ 3010.03                        |
| (d) Subtotal (add lines 6(b) and 6(c) for Column A and<br>lines 6(a) and 6(c) for Column B)  |                          | \$ 3010.03              | \$ 3010.03                        |
| 7. Total Disbursements (from Line 28)  |                          | \$ 18.92                | \$ 18.92                          |
| 8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))                     |                          | \$ 2991.11              | \$ 2991.11                        |
| 9. Debts and Obligations Owed TO the Committee<br>(Itemize all on Schedule C or Schedule D)  |                          | \$ 0                    |                                   |
| 10. Debts and Obligations Owed BY the Committee<br>(Itemize all on Schedule C or Schedule D) |                          | \$ 0                    |                                   |

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 800-424-9630  
Local 202-673-4088

Hon. William L. Clay  
Type or Print Name of Treasurer

*William L. Clay*  
SIGNATURE OF TREASURER

1/29/82

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 543

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

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FEC FORM 3X (2/

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# WING DELVER.

RECEIVED  
OFFICE OF THE CLERK  
U.S. HOUSE OF REPRESENTATIVES  
JUL 15 PM 1:30  
SECTION 101 ONLY

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

4. TYPE OF REPORT (check appropriate box)

(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  |                        | Column A<br>This Period | Column B<br>Calendar Year-to-Date |
|--|------------------------|-------------------------|-----------------------------------|
| 5. Covering Period   | 4/1/82 Through 6/30/82 |                         |                                   |
| 6. (a) Cash on Hand January 1, 1982  |                        |                         | \$ 2991.11                        |
| (b) Cash on Hand at Beginning of Reporting Period  |                        | \$ 137.11               |                                   |
| (c) Total Receipts (from Line 18)  |                        | \$ 17999.77             | \$ 22999.77                       |
| (d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)     |                        | \$ 18136.88             | \$ 25990.88                       |
| 7. Total Disbursements (from Line 28)  |                        | \$ 4149.58              | \$ 12003.58                       |
| 8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))                     |                        | \$ 13987.30             | \$ 13987.30                       |
| 9. Debts and Obligations Owed TO the Committee<br>(Itemize all on Schedule C or Schedule D)  |                        | \$ 0                    |                                   |
| 10. Debts and Obligations Owed BY the Committee<br>(Itemize all on Schedule C or Schedule D) |                        | \$ 2000.00              |                                   |

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 202-623-4088**

## Congressman Louis Stokes

Type of ~~Ball~~ Name of Transporter

**SIGNATURE OF TREASURER**

7/15/82  
Date

**NOTE:** Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 3 U.S.C. §437b.

**All previous versions of PSC FORM 3 and PSC FORM 2a are obsolete and should no longer be used.**

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FEC FORM 2X (2001)

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

| Name of Committee (in Full)  | Report Covering the Period:           |   |
|--|---------------------------------------|---|
| <b>Congressional Black Caucus PAC</b>  | From <b>4/1/</b>                      | To <b>6/30/82</b>                         |
|  | <b>COLUMN A<br/>Total This Period</b> | <b>COLUMN B<br/>Calendar Year-to-Date</b> |
| <b>I. RECEIPTS</b>   |                                       |   |
| <b>11 CONTRIBUTIONS (other than loans) FROM</b>  |                                       |   |
| (a) Individuals/Persons Other Than Political Committees  | 11954.77                              | 11954.77                                  |
| (b) Political Party Committees   | 0                                     | 0   |
| (c) Other Political Committees   | 6045.00                               | 9045.00                                   |
| (d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)                                | 17999.77                              | 20999.77                                  |
| <b>12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES</b>                                      | 0                                     | 0   |
| <b>13 ALL LOANS RECEIVED</b>   | 0                                     | 2000.00                                   |
| <b>14 LOAN REPAYMENTS RECEIVED</b>   | 0                                     | 0   |
| <b>15 OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)</b>                             | 0                                     | 0   |
| <b>16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b>    | 0                                     | 0   |
| <b>17. OTHER RECEIPTS (Dividends, Interest, etc.)</b>  | 0                                     | 0   |
| <b>18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)</b>                                   | 17999.77                              | 22999.77                                  |
| <b>II. DISBURSEMENTS</b>   |                                       |   |
| <b>19. OPERATING EXPENDITURES</b>  | 4149.58                               | 12003.58                                  |
| <b>20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES</b>  | 0                                     | 0   |
| <b>21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b>                    | 0                                     | 0   |
| <b>22. INDEPENDENT EXPENDITURES (Use Schedule G)</b>   | 0                                     | 0   |
| <b>23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441old) (Use Schedule F)</b> | 0                                     | 0   |
| <b>24. LOAN REPAYMENTS MADE</b>  | 0                                     | 0   |
| <b>25. LOANS MADE</b>  | 0                                     | 0   |
| <b>26. REFUNDS OF CONTRIBUTIONS TO</b>   |                                       |   |
| (a) Individuals/Persons Other Than Political Committees  | 0                                     | 0   |
| (b) Political Party Committees   | 0                                     | 0   |
| (c) Other Political Committees   | 0                                     | 0   |
| (d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)  | 0                                     | 0   |
| <b>27. OTHER DISBURSEMENTS</b>   | 0                                     | 0   |
| <b>28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)</b>                | 4149.58                               | 12003.58                                  |
| <b>III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES</b>                                     |                                       |   |
| <b>29. TOTAL CONTRIBUTIONS (other than loans) from Line 11</b>                                   | 17999.77                              | 22999.77                                  |
| <b>30. TOTAL CONTRIBUTION REFUNDS from Line 26d</b>  | 0                                     | 0   |
| <b>31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)</b>                  | 17999.77                              | 22999.77                                  |
| <b>32. TOTAL OPERATING EXPENDITURES from Line 19</b>   | 4149.58                               | 12003.58                                  |
| <b>33. OFFSETS TO OPERATING EXPENDITURES from Line 15</b>  | 0                                     | 0   |
| <b>34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)</b>                            | 4149.58                               | 12003.58                                  |

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**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 1 of 1 for  
LINE NUMBER 100  
(Use separate schedule for each  
category of the Detailed  
Summary Page)

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Name of Committee (in Full)

**Congressional Black Caucus Political Action Committee**

|   |  |   |  |  |
|---|--|---|--|--|
| <b>A. Full Name, Mailing Address and ZIP Code</b><br>A. J. McKnight<br>P. O. Box 3005<br>Lafayette, Louisiana 70501   |  | <b>Name of Employer</b><br><br><b>Occupation</b><br><br><b>Aggregate Year-to-Date-\$</b> 300.00 | <b>Date (month, day, year)</b><br>06/17/83 | <b>Amount of Each Receipt This Period</b><br>\$ 300.00 |
| <b>Receipt For:</b> <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):   |  |   |  |  |
| <b>B. Full Name, Mailing Address and ZIP Code</b><br><br><b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |  | <b>Name of Employer</b><br><br><b>Occupation</b><br><br><b>Aggregate Year-to-Date-\$</b>        | <b>Date (month, day, year)</b>             | <b>Amount of Each Receipt This Period</b>              |
| <b>C. Full Name, Mailing Address and ZIP Code</b><br><br><b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |  | <b>Name of Employer</b><br><br><b>Occupation</b><br><br><b>Aggregate Year-to-Date-\$</b>        | <b>Date (month, day, year)</b>             | <b>Amount of Each Receipt This Period</b>              |
| <b>D. Full Name, Mailing Address and ZIP Code</b><br><br><b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |  | <b>Name of Employer</b><br><br><b>Occupation</b><br><br><b>Aggregate Year-to-Date-\$</b>        | <b>Date (month, day, year)</b>             | <b>Amount of Each Receipt This Period</b>              |
| <b>E. Full Name, Mailing Address and ZIP Code</b><br><br><b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |  | <b>Name of Employer</b><br><br><b>Occupation</b><br><br><b>Aggregate Year-to-Date-\$</b>        | <b>Date (month, day, year)</b>             | <b>Amount of Each Receipt This Period</b>              |
| <b>F. Full Name, Mailing Address and ZIP Code</b><br><br><b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |  | <b>Name of Employer</b><br><br><b>Occupation</b><br><br><b>Aggregate Year-to-Date-\$</b>        | <b>Date (month, day, year)</b>             | <b>Amount of Each Receipt This Period</b>              |
| <b>G. Full Name, Mailing Address and ZIP Code</b><br><br><b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |  | <b>Name of Employer</b><br><br><b>Occupation</b><br><br><b>Aggregate Year-to-Date-\$</b>        | <b>Date (month, day, year)</b>             | <b>Amount of Each Receipt This Period</b>              |
| <b>SUBTOTAL of Receipts This Page (optional) . . . . .</b>  |  |   |  |  |
| <b>TOTAL This Period (last page this line number only) . . . . .</b>  |  |   |  | 300.00   |

82012191500



**SCHEDULE A**

**ITEMIZED RECEIPT**

Page 2 of 1 for  
LINE NUMBER 11a  
(Use separate schedule for each  
category of the Detailed  
Summary Page)

|  |  |                           |                         |
|--|--|---------------------------|-------------------------|
| Any information copied from such Reports or Statements may not be used or used for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to obtain contributions from such committee. |  |                           |                         |
| Name of Committee (in Full)<br><b>Congressional Black Caucus Political Action Committee</b>  |  |                           |                         |
| A. Full Name, Mailing Address and ZIP Code<br>Committee On Political Action of the<br>American Postal Workers Union, AFL-CIO<br>817 14th Street N.W.<br>Washington, D.C. 20005   |  | Name of Employer          | Date (month, day, year) |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):   |  | Occupation                | 04/16/82                |
|  |  | Aggregate Year-to-Date-\$ | 1000.00                 |
| B. Full Name, Mailing Address and ZIP Code<br>Black Affairs Center, Inc.<br>Washington, D. C. 20011  |  | Name of Employer          | Date (month, day, year) |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):   |  | Occupation                | 04/16/82                |
|  |  | Aggregate Year-to-Date-\$ | 100.00                  |
| C. Full Name, Mailing Address and ZIP Code<br>Engineers Political Education Committee<br>1125 17th Street N.W.<br>Washington, D. C. 20036  |  | Name of Employer          | Date (month, day, year) |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):   |  | Occupation                | 04/21/82                |
|  |  | Aggregate Year-to-Date-\$ | 1500.00                 |
| D. Full Name, Mailing Address and ZIP Code<br>Longshoremen's Political Action Committee<br>17 Battery Place<br>New York, New York 10004  |  | Name of Employer          | Date (month, day, year) |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):   |  | Occupation                | 05/24/82                |
|  |  | Aggregate Year-to-Date-\$ | 500.00                  |
| E. Full Name, Mailing Address and ZIP Code<br>Industrial Union Division - AFL-CIO<br>815 16th Street N.W.<br>Washington, D. C. 20006   |  | Name of Employer          | Date (month, day, year) |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):   |  | Occupation                | 06/24/82                |
|  |  | Aggregate Year-to-Date-\$ | 100.00                  |
| F. Full Name, Mailing Address and ZIP Code<br>Letter Carriers Political Education Com.<br>1 Indiana Ave. N.W.<br>Washington, D. C. 20001   |  | Name of Employer          | Date (month, day, year) |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):   |  | Occupation                | 04/18/82                |
|  |  | Aggregate Year-to-Date-\$ | 1000.00                 |
| G. Full Name, Mailing Address and ZIP Code<br>COPEPE<br>1325 Massachusetts Ave. N.W.<br>Washington, L. C. 20005  |  | Name of Employer          | Date (month, day, year) |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):   |  | Occupation                | 04/27/82                |
|  |  | Aggregate Year-to-Date-\$ | 270.00                  |
| SUBTOTAL of Receipts This Page (optional).....   |  |                           | 4470.00                 |
| TOTAL This Period (last page this line number only) .....  |  |                           |                         |

82012191502

**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 3 of 1 for  
LINE NUMBER 112  
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Name of Committee (in Full)  
**Congressional Black Caucus Political Action Committee**

| A. Full Name, Mailing Address and ZIP Code  | Name of Employer | Date (month, day, year)                 | Amount of Each Receipt This Period |
|---|------------------|---|------------------------------------|
| John D. O'Bryant Campaign Fund<br>52 Hillshoro Road<br>Mattapan, Massachusetts 02126  |                  | 05/24/82                                | \$50.00                            |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                      | Occupation       | Aggregate Year-to-Date-\$ <u>50.00</u>  |                                    |
| B. Full Name, Mailing Address and ZIP Code<br>Association of Black Women Attorneys<br>25 St. Nicholas Terrace<br>New York, New York 10027                   |                  | 06/24/82                                | \$50.00                            |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                      | Occupation       | Aggregate Year-to-Date-\$ <u>50.00</u>  |                                    |
| C. Full Name, Mailing Address and ZIP Code<br>Tuskegee Minister's Council<br>P. O. Box 1213<br>Tuskegee, Alabama 36088                                      |                  | 06/11/82                                | \$25.00                            |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                      | Occupation       | Aggregate Year-to-Date-\$ <u>25.00</u>  |                                    |
| D. Full Name, Mailing Address and ZIP Code<br>District Council of Washington, D.C. and Vicinity<br>1025 Vermont Avenue, Suite 720<br>Washington, D.C. 20005 |                  | 06/11/82                                | \$100.00                           |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                      | Occupation       | Aggregate Year-to-Date-\$ <u>100.00</u> |                                    |
| E. Full Name, Mailing Address and ZIP Code<br>Ronald J. Leeper Campaign Fund<br>400 Stonepost Road<br>Charlotte, N.C. 28210                                 |                  | 06/17/82                                | \$25.00                            |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                      | Occupation       | Aggregate Year-to-Date-\$ <u>25.00</u>  |                                    |
| F. Full Name, Mailing Address and ZIP Code<br>Bullock Washateria & Food Mart<br>130 St. Augustine Street<br>McComb, Mississippi 39648                       |                  | 06/17/82                                | \$25.00                            |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                      | Occupation       | Aggregate Year-to-Date-\$ <u>25.00</u>  |                                    |
| G. Full Name, Mailing Address and ZIP Code<br>New Shiloh Baptist Church<br>Fremont Ave. & Lanvale Street<br>Baltimore, Md. 21217                            |                  | 06/17/82                                | \$50.00                            |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                      | Occupation       | Aggregate Year-to-Date-\$ <u>50.00</u>  |                                    |
| <b>SUBTOTAL of Receipts This Page (optional)</b>  |                  |   | <b>325.00</b>                      |
| <b>TOTAL This Period (use page this line number only)</b>   |                  |   |                                    |

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82012191503

**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 4 of 1 for  
LINE NUMBER 116  
(Use separate schedule(s) for each  
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Summary Page)

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|---|---|-------------------------|---|
| Name of Committee (in Full)<br><b>Congressional Black Caucus Political Action Committee</b>   |   |                         |   |
| <b>A. Full Name, Mailing Address and ZIP Code</b><br>Bethel Baptist Church<br>Home Ave. & Summit Street<br>Dayton, Ohio 45407   | Name of Employer                        | Date (month, day, year) | Amount of Each Receipt This Period<br><br><b>\$50.00</b>  |
|   | Occupation                              | 06/17/82                |   |
|   | Aggregate Year-to-Date—\$ <b>50.00</b>  |                         |   |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):  |   |                         |   |
| <b>B. Full Name, Mailing Address and ZIP Code</b><br>Fabricare Center<br>3946-50 West 16th Street<br>Chicago, Illinois 60623  | Name of Employer                        | Date (month, day, year) | Amount of Each Receipt This Period<br><br><b>\$100.00</b> |
|   | Occupation                              | 06/11/82                |   |
|   | Aggregate Year-to-Date—\$ <b>100.00</b> |                         |   |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):  |   |                         |   |
| <b>C. Full Name, Mailing Address and ZIP Code</b><br>Mount Carmel Baptist Church<br>1376-78 Prospect Avenue<br>Bronx, New York 10459  | Name of Employer                        | Date (month, day, year) | Amount of Each Receipt This Period<br><br><b>\$50.00</b>  |
|   | Occupation                              | 06/11/82                |   |
|   | Aggregate Year-to-Date—\$ <b>50.00</b>  |                         |   |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):  |   |                         |   |
| <b>D. Full Name, Mailing Address and ZIP Code</b><br>Capital Outlook<br>P. O. Box 20267<br>Tallahassee, Florida 32304   | Name of Employer                        | Date (month, day, year) | Amount of Each Receipt This Period<br><br><b>\$25.00</b>  |
|   | Occupation                              | 06/11/82                |   |
|   | Aggregate Year-to-Date—\$ <b>25.00</b>  |                         |   |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):  |   |                         |   |
| <b>E. Full Name, Mailing Address and ZIP Code</b><br>United Church of Christ<br>105 Madison Avenue<br>New York, New York 10016  | Name of Employer                        | Date (month, day, year) | Amount of Each Receipt This Period<br><br><b>\$25.00</b>  |
|   | Occupation                              | 06/11/82                |   |
|   | Aggregate Year-to-Date—\$ <b>25.00</b>  |                         |   |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):  |   |                         |   |
| <b>F. Full Name, Mailing Address and ZIP Code</b>   | 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<br><input type="checkbox"/> Other (specify):   |   |                         |   |
| <b>G. Full Name, Mailing Address and ZIP Code</b>   | 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<br><input type="checkbox"/> Other (specify):   |   |                         |   |
| <b>SUBTOTAL of Receipts This Page (optional)</b>  |   |                         | <b>250.00</b>   |
| <b>TOTAL This Period (last page this line number only)</b>  |   |                         | <b>6045.00</b>  |

820121915041



**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 1 of 1  
 LINE NUMBER 11c  
 (Use separate schedule for each category of the Detailed Summary Page)

|   |   |                         |  |
|---|---|-------------------------|--|
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| Name of Committee (in Full)<br><b>Congressional Black Caucus Political Action Committee</b>   |   |                         |  |
| A. Full Name, Mailing Address and ZIP Code<br>Parren J. Mitchell Campaign For Congress<br>Committee<br>Suite 301, 4 East Franklin Street<br>Baltimore, Md. 21202  | Name of Employer                          | Date (month, day, year) | Amount of Each Receipt This Period<br><br>\$1,000.00 |
|   | Occupation                                | 06/11/82                |  |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):  | Aggregate Year-to-Date-\$ <b>1,000.00</b> |                         |  |
| B. Full Name, Mailing Address and ZIP Code  | Name of Employer                          | Date (month, day, year) | Amount of Each Receipt This Period                   |
|   | Occupation                                |                         |  |
| Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> 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: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> 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: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> 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: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> 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: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> 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: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):   | Aggregate Year-to-Date-\$                 |                         |  |
| SUBTOTAL of Receipts This Page (optional) . . . . .   |   |                         | 1000.00  |
| TOTAL This Period (last page this line number only) . . . . .   |   |                         |  |

-R-4-0-4-0-4-6-0-6-0-2

**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

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

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Name of Committee (in Full)  
**Congressional Black Caucus Political Action Committee**

|  |  |                                     |   |
|--|--|-------------------------------------|---|
| A. Full Name, Mailing Address and ZIP Code<br>Ms. Georgiana Anderson-Land<br>8715 First Avenue #1401 D<br>Silver Spring, Md. 20910 | Purpose of Disbursement<br><b>SALARY</b><br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):  | Date (month, day, year)<br>04/21/82 | Amount of Each Disbursement This Period<br>\$2,000.00 |
| B. Full Name, Mailing Address and ZIP Code<br>"  | Purpose of Disbursement<br><b>Postage Reimbursement</b><br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                             | Date (month, day, year)<br>05/05/82 | Amount of Each Disbursement This Period<br>\$40.00    |
| C. Full Name, Mailing Address and ZIP Code<br>"  | Purpose of Disbursement<br><b>Salary</b><br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):  | Date (month, day, year)<br>05/18/82 | Amount of Each Disbursement This Period<br>\$600.00   |
| D. Full Name, Mailing Address and ZIP Code<br>"  | Purpose of Disbursement<br><b>Reimbursement for Postage and Printing</b><br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):            | Date (month, day, year)<br>05/19/82 | Amount of Each Disbursement This Period<br>\$231.58   |
| E. Full Name, Mailing Address and ZIP Code<br>"  | Purpose of Disbursement<br><b>Salary</b><br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):  | Date (month, day, year)<br>05/27/82 | Amount of Each Disbursement This Period<br>\$1000.00  |
| F. Full Name, Mailing Address and ZIP Code<br>David R. Ramage, Inc.<br>WA-29 Longworth HOB<br>Washington, D.C. 20515               | Purpose of Disbursement<br><b>Calling Cards, Cards and envelopes for letterhead</b><br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | Date (month, day, year)<br>06/17/82 | Amount of Each Disbursement This Period<br>\$278.00   |
| G. Full Name, Mailing Address and ZIP Code   | Purpose of Disbursement<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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) .....  |  |                                     | <b>\$4,149.58</b>                                     |

8842004102169016503

84040460604



HAND DELIVERED

REPORT OF RECEIPTS AND DISBURSEMENTS  
Political Committee Other Than an Authorized Committee

097683

(Summary Page)

ALIGN AREA

1 Name of Committee (In Full)

Congressional Black Caucus Political  
Action Committee

Address (Number and Street)

PO Box 2006

City, State and ZIP Code

Washington, DC 20013

☐ Check here if address is different than previously reported

2 FEC Identification Number

097683

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

4 Enter the date of this report in the appropriate format:

1982 OCT 14 PM 3:26

(a) ☐ Report the Quarterly Report (October 15 to January 14)

☐ July 15 to October 14 Report (Quarterly Report)

☐ July 15 to May 14 Report (Quarterly Report)

☐ Monthly Report (Monthly Report)

☐ Twelfth day report preceding

☐ Twelfth day report following the General Election

☐ Termination Report

(b) Is this Report an Amendment?

☐ YES

☐ NO

SUMMARY

5. Covering Period 7/1/82 through 9/30/82

6. (a) Cash on hand January 1, 1982

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 1B)

(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 2B)

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

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

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

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

Congressman Louis Stokes

Type or Print Name of Treasurer

*Louis Stokes*  
LOUIS STOKES

10/13/82

Date

For further information contact

Federal Election Commission

Toll Free 800 424 9530

Local 202 523 4068

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)

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

Name of Committee (in Full)

**Congressional Black Caucus Political Action Committee**

Report Covering the Period

From **7/1/82**

To **9/30/82**

**COLUMN A  
Total This Period**

**COLUMN B  
Calendar Year-To Date**

**I. RECEIPTS**

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

(a) Individuals/Persons Other Than Political Committees

(Memo Entry Unitized) \$ **3384.50**

(b) Political Party Committees

(c) Other Political Committees

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

**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 11(d), 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 (see Schedule E)**

**23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES  
(2 U.S.C. § 441 e(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 26(a), 26(b) and 26(c))

**27. OTHER DISBURSEMENTS**

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

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

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

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

**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)**

84040160606  
82010071030

7

**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 1 of 1 for  
LINE NUMBER 11a  
(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)

**Congressional Black Caucus Political Action Committee**

|  |  |   |   |  |
|--|--|---|---|--|
| <b>A. Full Name, Mailing Address and ZIP Code</b><br>Porter Bankhead<br>7928 16th Street, NW<br>Washington, DC 20012                   |  | Name of Employer<br><b>Systems &amp; Applied Sciences Corp.</b> | Date (month, day, year)<br><b>7/26/82</b> | Amount of Each Receipt This Period<br><b>1000.00</b> |
| Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |  | Occupation<br><b>businessman</b>                                | Aggregate Year-to-Date-\$ <b>1000.00</b>  |  |
| <b>B. Full Name, Mailing Address and ZIP Code</b>  |  | Name of Employer  | Date (month, day, year)                   | Amount of Each Receipt This Period                   |
| Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):            |  | Occupation  | Aggregate Year-to-Date-\$                 |  |
| <b>C. Full Name, Mailing Address and ZIP Code</b>  |  | Name of Employer  | Date (month, day, year)                   | Amount of Each Receipt This Period                   |
| Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):            |  | Occupation  | Aggregate Year-to-Date-\$                 |  |
| <b>D. Full Name, Mailing Address and ZIP Code</b>  |  | Name of Employer  | Date (month, day, year)                   | Amount of Each Receipt This Period                   |
| Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):            |  | Occupation  | Aggregate Year-to-Date-\$                 |  |
| <b>E. Full Name, Mailing Address and ZIP Code</b>  |  | Name of Employer  | Date (month, day, year)                   | Amount of Each Receipt This Period                   |
| Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):            |  | Occupation  | Aggregate Year-to-Date-\$                 |  |
| <b>F. Full Name, Mailing Address and ZIP Code</b>  |  | Name of Employer  | Date (month, day, year)                   | Amount of Each Receipt This Period                   |
| Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):            |  | Occupation  | Aggregate Year-to-Date-\$                 |  |
| <b>G. Full Name, Mailing Address and ZIP Code</b>  |  | Name of Employer  | Date (month, day, year)                   | Amount of Each Receipt This Period                   |
| Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):            |  | Occupation  | Aggregate Year-to-Date-\$                 |  |
| <b>SUBTOTAL of Receipts This Page (optional)</b>   |  |   |   |  |
| <b>TOTAL This Period (last page this line number only)</b>   |  |   |   | <b>1000.00</b>                                       |

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SCHEDULE A

ITEMIZED RECEIPTS

Page 1 of 2  
LINE NUMBER 116  
(Use separate sheet for each category of the receipts furnished Page)

| Any information on this and other such receipts or statements may not be used for any purpose for the purpose of obtaining a refund for the amount of the receipts or statements. |  |  |   |
|---|--|--|---|
| Receipt of Cash (See Form 1041)   |  |  |   |
| <b>Congressional Black Caucus Political Action Committee</b>  |  |  |   |
| <b>A. Full Name, Mailing Address and ZIP Code</b><br>Lambda Omega Chapter of Omega Psi Phi Fraternity<br>PO Box 1805<br>Norfolk, VA 23501   | <b>Name of Employer</b><br><br><b>Occupation</b><br>sorority           | <b>Date (month, day, year)</b><br>7/1/82 | <b>Amount of Each Receipt This Period</b><br>25.00  |
| <b>Receipt For</b><br><input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)                                       | <b>Aggregate Year-to-Date \$ 25.00</b>                                 |  |   |
| <b>B. Full Name, Mailing Address and ZIP Code</b><br>Black Nurses Association of GWA<br>PO Box 1673<br>Washington, DC 20011   | <b>Name of Employer</b><br><br><b>Occupation</b><br>association        | <b>Date (month, day, year)</b><br>7/1/82 | <b>Amount of Each Receipt This Period</b><br>25.00  |
| <b>Receipt For</b><br><input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)                                       | <b>Aggregate Year-to-Date \$ 25.00</b>                                 |  |   |
| <b>C. Full Name, Mailing Address and ZIP Code</b><br>Alpha Gamma Chapter Eta Phi Beta<br>15901 Bunche Park E. Dr.<br>Opa Locka, FL 33054  | <b>Name of Employer</b><br><br><b>Occupation</b><br>sorority           | <b>Date (month, day, year)</b><br>7/1/82 | <b>Amount of Each Receipt This Period</b><br>25.00  |
| <b>Receipt For</b><br><input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)                                       | <b>Aggregate Year-to-Date \$ 25.00</b>                                 |  |   |
| <b>D. Full Name, Mailing Address and ZIP Code</b><br>Brown & Williamson Tobacco Corp.<br>Tobacco Support Committee<br>1600 W Hill St. PO Box 35090<br>Louisville, KY 40232        | <b>Name of Employer</b><br><br><b>Occupation</b><br>PAC                | <b>Date (month, day, year)</b><br>7/1/82 | <b>Amount of Each Receipt This Period</b><br>500.00 |
| <b>Receipt For</b><br><input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)                                       | <b>Aggregate Year-to-Date \$ 500.00</b>                                |  |   |
| <b>E. Full Name, Mailing Address and ZIP Code</b><br>Leviticus International<br>45 W. 33rd Street, NY 10001   | <b>Name of Employer</b><br><br><b>Occupation</b><br>entertainment club | <b>Date (month, day, year)</b><br>7/1/82 | <b>Amount of Each Receipt This Period</b><br>100.00 |
| <b>Receipt For</b><br><input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)                                       | <b>Aggregate Year-to-Date \$ 100.00</b>                                |  |   |
| <b>F. Full Name, Mailing Address and ZIP Code</b><br>Mt. Zion Deacon's Mission Fund<br>603 N. Augusta St.<br>Staunton, VA 24401   | <b>Name of Employer</b><br><br><b>Occupation</b><br>church fund        | <b>Date (month, day, year)</b><br>7/7/82 | <b>Amount of Each Receipt This Period</b><br>25.00  |
| <b>Receipt For</b><br><input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)                                       | <b>Aggregate Year-to-Date \$ 25.00</b>                                 |  |   |
| <b>G. Full Name, Mailing Address and ZIP Code</b><br>Bonner & Halthcock, MD's LTD.<br>2nd & Franklin Sts. Suite 201<br>PO Box 12406<br>Richmond, VA                               | <b>Name of Employer</b><br><br><b>Occupation</b><br>health group       | <b>Date (month, day, year)</b><br>9/1/82 | <b>Amount of Each Receipt This Period</b><br>25.00  |
| <b>Receipt For</b><br><input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)                                       | <b>Aggregate Year-to-Date \$ 25.00</b>                                 |  |   |
| <b>SUBTOTAL of Receipts This Page (optional)</b>  |  |  | <b>725.00</b>                                       |
| <b>TOTAL This Period (last page this line number only)</b>  |  |  |   |

99  
99  
66  
99  
66  
33  
44  
99  
66

**SCHEDULE A**

**ITEMIZED RECEIPTS**

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

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Name of Committee (in Full)

**Congressional Black Caucus Political Action Committee**

A. Full Name, Mailing Address and ZIP Code  
**Widers Variety Service Company**  
**66 Ludlow Street**  
**Stamford, CT 06902**

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation  
**business**

7/26/81

25.00

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

Aggregate Year-to-Date-\$ **25.00**

B. Full Name, Mailing Address and ZIP Code

**Computer Sciences Corp. PAC**  
**650 N. Sepulveda Blvd.**  
**El Segundo, CA 90245**

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation  
**PAC**

8/17/81

1000.00

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

Aggregate Year-to-Date-\$ **1000.00**

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) . . . . .

1025.00

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

1750.00

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

## SCHEDULE B

## ITEMIZED DISBURSEMENTS

Page 1 of 1 for  
 LINE NUMBER 14  
 (Use separate sheets for each  
 category of the Data on  
 Summary Page)

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

Name of Committee (in Full)  
**Congressional Black Caucus Political Action Committee**

|  |   |   |  |
|--|---|---|--|
| <b>A. Full Name, Mailing Address and ZIP Code</b><br>David Ramage, Inc.<br>WA-29 Longworth HOB<br>Washington, DC 20515 | <b>Purpose of Disbursement</b><br>printing of invitations<br><br>(Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):     | <b>Date (month, day, year)</b><br>7/15/82 | <b>Amount of Each Disbursement This Period</b><br>82.00  |
| <b>B. Full Name, Mailing Address and ZIP Code</b><br>Metro Business Forms<br>8543 Groveton Circle<br>Gaithersburg, MD  | <b>Purpose of Disbursement</b><br>letterhead cancellation fee<br><br>(Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | <b>Date (month, day, year)</b><br>7/19/82 | <b>Amount of Each Disbursement This Period</b><br>95.00  |
| <b>C. Full Name, Mailing Address and ZIP Code</b><br>SAME AS ABOVE   | <b>Purpose of Disbursement</b><br>letterhead printing<br><br>(Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):         | <b>Date (month, day, year)</b><br>8/12/82 | <b>Amount of Each Disbursement This Period</b><br>382.32 |
| <b>D. Full Name, Mailing Address and ZIP Code</b><br>U.S. Postmaster<br>Main Post Office<br>Washington, DC 20013       | <b>Purpose of Disbursement</b><br>PO Box rental fee<br><br>(Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):           | <b>Date (month, day, year)</b><br>8/12/82 | <b>Amount of Each Disbursement This Period</b><br>20.00  |
| <b>E. Full Name, Mailing Address and ZIP Code</b><br>SAME AS ABOVE   | <b>Purpose of Disbursement</b><br>postage -- stamps<br><br>(Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):           | <b>Date (month, day, year)</b><br>9/10/82 | <b>Amount of Each Disbursement This Period</b><br>120.00 |
| <b>F. Full Name, Mailing Address and ZIP Code</b>  | <b>Purpose of Disbursement</b><br><br><br>(Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                                       | <b>Date (month, day, year)</b>            | <b>Amount of Each Disbursement This Period</b>           |
| <b>G. Full Name, Mailing Address and ZIP Code</b>  | <b>Purpose of Disbursement</b><br><br><br>(Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                                       | <b>Date (month, day, year)</b>            | <b>Amount of Each Disbursement This Period</b>           |
| <b>H. Full Name, Mailing Address and ZIP Code</b>  | <b>Purpose of Disbursement</b><br><br><br>(Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                                       | <b>Date (month, day, year)</b>            | <b>Amount of Each Disbursement This Period</b>           |
| <b>I. Full Name, Mailing Address and ZIP Code</b>  | <b>Purpose of Disbursement</b><br><br><br>(Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                                       | <b>Date (month, day, year)</b>            | <b>Amount of Each Disbursement This Period</b>           |
| <b>SUBTOTAL of Disbursements This Page (optional)</b> .....  |   |   |  |
| <b>TOTAL This Period (last page this line number only)</b> .....   |   |   | <b>699.32</b>  |

81040460610  
 82012371732



**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

Page 1 of 1 for  
LINE NUMBER 21  
(Use separate schedules for  
category of the Liable  
Summary Page)

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

Name of Committee (in Full)

**Congressional Black Caucus Political Action Committee**

| A. Full Name, Mailing Address and ZIP Code                                      | Purpose of Disbursement   | Date (month, day, year) | Amount of Disbursement This |
|---|---|-------------------------|-----------------------------|
| Wheat for Congress Committee<br>3123 Swope Parkway<br>Kansas City, MO 64130     | political contribution<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | 9/21/82                 | 500.00                      |
| B. Full Name, Mailing Address and ZIP Code                                      | Purpose of Disbursement   | Date (month, day, year) | Amount of Disbursement This |
| Committee to Elect Ken Mosely<br>PO Drawer 1569<br>Orange Burg, SC 29115        | political contribution<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | 9/21/82                 | 500.00                      |
| C. Full Name, Mailing Address and ZIP Code                                      | Purpose of Disbursement   | Date (month, day, year) | Amount of Disbursement This |
| Robert Clarke for Congress Comm.<br>PO Box 179<br>320 Yazoo Lexington, MS 39095 | political contribution<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | 9/21/82                 | 500.00                      |
| D. Full Name, Mailing Address and ZIP Code                                      | Purpose of Disbursement   | Date (month, day, year) | Amount of Disbursement This |
|   | Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                                      |                         |                             |
| E. Full Name, Mailing Address and ZIP Code                                      | Purpose of Disbursement   | Date (month, day, year) | Amount of Disbursement This |
|   | Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                                      |                         |                             |
| F. Full Name, Mailing Address and ZIP Code                                      | Purpose of Disbursement   | Date (month, day, year) | Amount of Disbursement This |
|   | Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                                      |                         |                             |
| G. Full Name, Mailing Address and ZIP Code                                      | Purpose of Disbursement   | Date (month, day, year) | Amount of Disbursement This |
|   | Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                                      |                         |                             |
| H. Full Name, Mailing Address and ZIP Code                                      | Purpose of Disbursement   | Date (month, day, year) | Amount of Disbursement This |
|   | Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                                      |                         |                             |
| I. Full Name, Mailing Address and ZIP Code                                      | Purpose of Disbursement   | Date (month, day, year) | Amount of Disbursement This |
|   | Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                                      |                         |                             |
| SUBTOTAL of Disbursements This Page (optional) .....                            |   |                         | 1500.                       |
| TOTAL This Period (last page this line number only) .....                       |   |                         | 1500.                       |

82012271935

**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

Page 1 of 1 for  
**LINE NUMBER 24**  
 (Use separate schedule(s) for each  
 category of the Detailed  
 Summary Page)

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Name of Committee (in Full)

**Congressional Black Caucus Political Action Committee**

| A. Full Name, Mailing Address and ZIP Code                                   | Purpose of Disbursement  | Date (month, day, year) | Amount of Each Disbursement This Period |
|--|--|-------------------------|---|
| Crockett for Congress Committee<br>2161 Bryanston Court<br>Detroit, MI 48226 | repayment of loan<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | 7/15/82                 | 1000.00                                 |
| B. Full Name, Mailing Address and ZIP Code                                   | Purpose of Disbursement<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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) .....                    |  |                         | 1000.00                                 |

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 82012271936

**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

Page 1 of 1  
 LINE NUMBER 260  
 (Use separate schedules for each category of the Detailed Summary Page)

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

Name of Committee (in Full)

**Congressional Black Caucus Political Action Committee**

| A. Full Name, Mailing Address and ZIP Code                                 | Purpose of Disbursement   | Date (month, day, year) | Amount of Each Disbursement This Period |
|--|---|-------------------------|---|
| Bill Gray for Congress Committee<br>PO Box 15038<br>Philadelphia, PA 19121 | refund of contribution<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | 9/17/82                 | 1000.00                                 |
| B. Full Name, Mailing Address and ZIP Code                                 | Purpose of Disbursement<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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) .....                  |   |                         | 1000.00                                 |

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**SCHEDULE C**  
(Revised 3/82)

**LOANS**

Page 1 of 1 by  
LINE NUMBER 10  
Also complete schedule  
for each numbered line

|   |  |  |  |
|---|--|--|--|
| <b>Name of Committee (in Full)</b><br><b>Congressional Black Caucus Political Action Committee</b>  |  |  |  |
| <b>A. Full Name, Mailing Address and ZIP Code of Loan Source</b><br><b>Crockett for Congress Committee</b><br><b>2161 Bryanston Court</b><br><b>Detroit, MI 48226</b> | <b>Original Amount of Loan</b><br><b>1000.00</b> | <b>Cumulative Payments To Date</b><br><b>1000.00</b> | <b>Balance Outstanding at Close of This Period</b><br><b>- 0 -</b>   |
| <b>Election:</b> <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):                               |  |  |  |
| <b>Terms:</b> Date Incurred <u>1/29/82</u> Date Due <u>open</u> Interest Rate <u>0</u> % (appr) <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><br>\$      |  |  |
| <b>2. Full Name, Mailing Address and ZIP Code</b>   | <b>Name of Employer</b>                          |  |  |
|   | <b>Occupation</b>                                |  |  |
|   | <b>Amount Guaranteed Outstanding:</b><br>\$      |  |  |
| <b>3. Full Name, Mailing Address and ZIP Code</b>   | <b>Name of Employer</b>                          |  |  |
|   | <b>Occupation</b>                                |  |  |
|   | <b>Amount Guaranteed Outstanding:</b><br>\$      |  |  |
| <b>B. Full Name, Mailing Address and ZIP Code of Loan Source</b>  |  |  |  |
| <b>Julian C. Dixon, Dem. for Congress</b><br><b>1581 Roxbury Drive</b><br><b>Los Angeles, CA 90035</b>  | <b>Original Amount of Loan</b><br><b>1000.00</b> | <b>Cumulative Payments To Date</b><br><b>- 0 -</b>   | <b>Balance Outstanding at Close of This Period</b><br><b>1000.00</b> |
| <b>Election:</b> <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):                               |  |  |  |
| <b>Terms:</b> Date Incurred <u>1/29/82</u> Date Due <u>open</u> Interest Rate <u>0</u> % (appr) <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><br>\$      |  |  |
| <b>2. Full Name, Mailing Address and ZIP Code</b>   | <b>Name of Employer</b>                          |  |  |
|   | <b>Occupation</b>                                |  |  |
|   | <b>Amount Guaranteed Outstanding:</b><br>\$      |  |  |
| <b>3. Full Name, Mailing Address and ZIP Code</b>   | <b>Name of Employer</b>                          |  |  |
|   | <b>Occupation</b>                                |  |  |
|   | <b>Amount Guaranteed Outstanding:</b><br>\$      |  |  |
| <b>SUBTOTALS This Period This Page (optional)</b>   |  |  |  |
| <b>TOTALS This Period (last page in this line only)</b>   |  |  | <b>1000.00</b>   |
| Carry outstanding balances only to LINE 3, Schedule D, for this line. If no carryover, leave blank.   |  |  |  |

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

(Summary Page)

**HAND DELIVERED**

82 DEC 14 P 1:

1 Name of Committee (in full)  
**Congressional Black Caucus Political Action Committee**

Address (Number and Street)

**PO Box 2006**

City, State and ZIP Code

**Washington, DC 20013**

Check if address is different than previously reported

2 FEC Identification Number  
**097683**

3 This committee qualified as a multicandidate committee during this Reporting Period on (date)

4 TYPE OF REPORT (check appropriate box)  
(a) April 15 Quarterly Report  
July 15 Quarterly Report  
October 15 Quarterly Report  
January 31 Year End Report  
July 31 Mid Year Report (Non-electoral Year Only)  
Monthly Report for  
Twelfth day report (preceding election on \_\_\_\_\_ in the State of \_\_\_\_\_)  
☒ Thirtieth day report following the General Election on **November 2** in the State of **open**  
Termination Report  
(b) Is this Report an Amendment?  
YES ☐ NO ☒

| SUMMARY  |  | Column A<br>This Period | Column B<br>Calendar Year-to-Date |
|--|--|-------------------------|-----------------------------------|
| 5 Covering Period  | <b>10/1/82</b> Through <b>11/22/82</b> |                         |                                   |
| 6 (a) Cash on Hand January 1, 19 <b>82</b>   |  |                         | \$ 2991.11                        |
| (b) Cash on Hand at Beginning of Reporting Period  |  | \$ 16068.80             |                                   |
| (c) Total Receipts (from Line 18)  |  | \$ 501.00               | \$ 29936.13                       |
| (d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B) |  | \$ 16569.80             | \$ 32927.24                       |
| 7 Total Disbursements (from Line 28)   |  | \$ 0                    | \$ 16357.44                       |
| 8 Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))                  |  | \$ 16569.80             | \$ 16569.80                       |
| 9 Debts and Obligations Owed TO the Committee (itemize all on Schedule C or Schedule D)  |  | \$ 0                    |                                   |
| 10 Debts and Obligations Owed BY the Committee (itemize all on Schedule C or Schedule D) |  | \$ 1000.00              |                                   |

I hereby 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  
Telephone: 800 424 9530  
Local: 202 527 4058

**Congressman Louis Stokes**

Treasurer

**SIGNATURE OF TREASURER**

**12/1/82**

Date

NOTE

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

FEC FORM 3a 13 80

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

| Name of Committee (in full)<br><b>Congressional Black Caucus Political Action Comm.</b>          | Report Covering the Period<br>From <b>10/1</b> to <b>11/22/82</b> |                                   |
|--|---|-----------------------------------|
|  | COLUMN A<br>Total This Period                                     | COLUMN B<br>Calendar Year to Date |
| <b>I. RECEIPTS</b>   |   |                                   |
| <b>11 CONTRIBUTIONS (other than loans) FROM</b>  |   |                                   |
| (a) Individuals (Persons Other Than Political Committees)  | 401.00  | 16740.27                          |
| (Memo Entry Unitemized \$ <b>401.00</b> )  | 0   | 0                                 |
| (b) Political Party Committees   | 100.00  | 10895.00                          |
| (c) Other Political Committees   | 501.00  | 27635.27                          |
| <b>(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)</b>                         | 0   | 0                                 |
| <b>12 TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES</b>                                       | 0   | 2000.00                           |
| <b>13 ALL LOANS RECEIVED</b>   | 0   | 0                                 |
| <b>14 LOAN REPAYMENTS RECEIVED</b>   | 0   | 0                                 |
| <b>15 OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)</b>                             | 0   | 0                                 |
| <b>16 REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b>     | 0   | 300.86                            |
| <b>17 OTHER RECEIPTS (Dividends, Interest, etc.)</b>   | 501.00  | 29936.13                          |
| <b>18 TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)</b>                                    |   |                                   |
| <b>II. DISBURSEMENTS</b>   |   |                                   |
| <b>19 OPERATING EXPENDITURES</b>   | 0   | 12857.44                          |
| <b>20 TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES</b>   | 0   | 0                                 |
| <b>21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b>                     | 0   | 1500.00                           |
| <b>22 INDEPENDENT EXPENDITURES (Use Schedule E)</b>  | 0   | 0                                 |
| <b>23 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule E)</b> | 0   | 0                                 |
| <b>24 LOAN REPAYMENTS MADE</b>   | 0   | 1000.00                           |
| <b>25 LOANS MADE</b>   | 0   | 0                                 |
| <b>26 REFUNDS OF CONTRIBUTIONS TO</b>  |   |                                   |
| (a) Individuals (Persons Other Than Political Committees)  | 0   | 0                                 |
| (b) Political Party Committees   | 0   | 0                                 |
| (c) Other Political Committees   | 0   | 1000.00                           |
| <b>(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)</b>                                     | 0   | 1000.00                           |
| <b>27 OTHER DISBURSEMENTS</b>  | 0   | 0                                 |
| <b>28 TOTAL DISBURSEMENTS (Add 19, 20, 21, 22, 23, 24, 25, 26d and 27)</b>                       | 0   | 16357.44                          |
| <b>III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES</b>                                     |   |                                   |
| <b>29 TOTAL CONTRIBUTIONS (other than loans) from Line 11d</b>                                   | 501.00  | 27635.27                          |
| <b>30 TOTAL CONTRIBUTION REFUNDING from Line 26d</b>   | 0   | 1000.00                           |
| <b>31 NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)</b>                   | 501.00  | 26635.27                          |
| <b>32 TOTAL OPERATING EXPENDITURES from Line 19</b>  | 0   | 12857.44                          |
| <b>33 OFFSETS TO OPERATING EXPENDITURES from Line 15</b>   | 0   | 0                                 |
| <b>34 NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)</b>                             | 0   | 12857.44                          |

84040460617



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

**LOANS**

Page 1 of 1  
Date 1/15/82  
Filing Date 1/15/82

Report of Contributor (in full)

**Congressional Black Caucus Political Action Committee**

A Full Name, Mailing Address and ZIP Code of Loan Source

**Julian C. Dixon, Democrat for Congress**  
**1581 Roxbury Drive**  
**Los Angeles, CA 90035**

(Is this loan from a Primary General Other (specify))

Terms Date Incurred **1/29/82** Date Due **open**

Original Amount  
of Loan

**1000.00**

Cumulative Payments  
To Date

**- 0 -**

Balance Outstanding at  
Close of This Period

**1000.00**

Interest Rate **0**

List All Endorsers or Guarantors (if any) to Item A

1 Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed (if any) to Item A

\$

2 Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed (if any) to Item A

\$

3 Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed (if any) to Item A

\$

B Full Name, Mailing Address and ZIP Code of Loan Source

Original Amount  
of Loan

Cumulative Payments  
To Date

Balance Outstanding at  
Close of This Period

Election Primary General Other (specify)

Terms Date Incurred Date Due

Interest Rate

List All Endorsers or Guarantors (if any) to Item B

1 Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed (if any) to Item B

\$

2 Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed (if any) to Item B

\$

3 Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed (if any) to Item B

\$

SUBTOTALS (including line 1, if applicable)

TOTAL (including line 1, if applicable)

**1000.00**

Carry outstanding balance only to LINE 3, Schedule D for this line. If no Schedule D, carry forward to appropriate line of Summary.



84040460620

11/16/68 ... .. FETC

83 JAN 31 11:40

**ALIGN AREA** 

**ALIGN AREA**

4. TYPE OF REPORT (Check appropriate boxes)

☐ April 15 Quarterly Report      ☐ October 15 Quarterly Report☐ July 15 Quarterly Report      ☒ January 31 Year End Report☐ **July 31 Mid Year Report (Non-Election Year Only)**

☐ Monthly Report for \_\_\_\_\_

☐ Twelfth day report preceding \_\_\_\_\_ (Type of Statute)

☐ Thirtieth day report following the General Election

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

☐ **Termination Report**

**(b) Is this Report an Amendment?**

☐ YES NO

**COLUMN A**  
**This Period**

**COLUMN D**  
**Calendar Year-to-Date****\$ 2991.11**

**.S 16569.80**

|   |          |
|---|----------|
| 0 | 29936.13 |
|---|----------|

|            |            |
|------------|------------|
| • 16569.80 | • 32927.24 |
|------------|------------|

|                  |                    |
|------------------|--------------------|
| <b>\$ 250.00</b> | <b>\$ 16607.44</b> |
|------------------|--------------------|

|                    |                    |
|--------------------|--------------------|
| <b>\$ 16319.80</b> | <b>\$ 16319.80</b> |
|--------------------|--------------------|

**.8 0**

**.8 1000.00**

**For further information contact:**

**Federal Election Commission**

**Toll Free 800-424-9620**

**Local 202-523-4000**

One

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

**All previous versions of FBC FORM 3 and FBC FORM 2a are obsolete and should no longer be used.**

FEC FORM 3X (3/80)

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

| Name of Committee (in Full)  |        | Report Covering the Period    |                                   |  |
|--|--------|-------------------------------|-----------------------------------|--|
| Congressional Black Caucus Political Action Comm.  |        | From 11/23/82                 | To 12/31/82                       |  |
|  |        | COLUMN A<br>Total This Period | COLUMN B<br>Calendar Year-To-Date |  |
| <b>I. RECEIPTS</b>   |        |                               |                                   |  |
| <b>11. CONTRIBUTIONS (other than loans) FROM:</b>  |        |                               |                                   |  |
| (a) Individuals/Persons Other Than Political Committees  | 0      | 16740.27                      | 11(a)                             |  |
| Memo Entry Unincurred \$ 0   |        |                               |                                   |  |
| (b) Political Party Committees   | 0      | 0                             | 11(b)                             |  |
| (c) Other Political Committees   | 0      | 10895.00                      | 11(c)                             |  |
| (d) TOTAL CONTRIBUTIONS (other than loans) (Add 11(a), 11(b) and 11(c))                            | 501.00 | 27635.27                      | 11(d)                             |  |
| <b>12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES</b>  | 0      | 0                             | 12                                |  |
| <b>13. ALL LOANS RECEIVED</b>  | 0      | 2000.00                       | 13                                |  |
| <b>14. LOAN REPAYMENTS RECEIVED</b>  | 0      | 0                             | 14                                |  |
| <b>15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)</b>                              | 0      | 0                             | 15                                |  |
| <b>16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b>      | 0      | 0                             | 16                                |  |
| <b>17. OTHER RECEIPTS (Dividends, Interest, etc.)</b>  | 0      | 300.86                        | 17                                |  |
| <b>18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)</b>                                   | 0      | 29936.13                      | 18                                |  |
| <b>II. DISBURSEMENTS</b>   |        |                               |                                   |  |
| <b>19. OPERATING EXPENDITURES</b>  | 250.00 | 13107.44                      | 19                                |  |
| <b>20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES</b>  | 0      | 0                             | 20                                |  |
| <b>21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b>                      | 0      | 0                             | 21                                |  |
| <b>22. INDEPENDENT EXPENDITURES (see Schedule E)</b>   | 0      | 0                             | 22                                |  |
| <b>23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 (d)) (Use Schedule F)</b> | 0      | 0                             | 23                                |  |
| <b>24. LOAN REPAYMENTS MADE</b>  | 0      | 1000.00                       | 24                                |  |
| <b>25. LOANS MADE</b>  | 0      | 0                             | 25                                |  |
| <b>26. REFUNDS OF CONTRIBUTIONS TO</b>   |        |                               |                                   |  |
| (a) Individuals/Persons Other Than Political Committees  | 0      | 0                             | 26(a)                             |  |
| (b) Political Party Committees   | 0      | 0                             | 26(b)                             |  |
| (c) Other Political Committees   | 0      | 1000.00                       | 26(c)                             |  |
| (d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))  | 0      | 1000.00                       | 26(d)                             |  |
| <b>27. OTHER DISBURSEMENTS</b>   | 0      | 0                             | 27                                |  |
| <b>28. TOTAL DISBURSEMENTS (Add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)</b>                | 250.00 | 16607.44                      | 28                                |  |
| <b>III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES</b>                                       |        |                               |                                   |  |
| <b>29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)</b>                                  | 0      | 27635.27                      | 29                                |  |
| <b>30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)</b>  | 0      | 1000.00                       | 30                                |  |
| <b>31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)</b>                    | 0      | 26635.27                      | 31                                |  |
| <b>32. TOTAL OPERATING EXPENDITURES from Line 19</b>   | 250.00 | 13107.44                      | 32                                |  |
| <b>33. OFFSETS TO OPERATING EXPENDITURES from Line 15</b>  | 0      | 0                             | 33                                |  |
| <b>34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)</b>                              | 250.00 | 13107.44                      | 34                                |  |

34040622



**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

Page 1 of 1 for  
**LINE NUMBER 16**  
 (Use separate schedule(s) for each  
 category of the Detailed  
 Summary Page)

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

Name of Committee (in Full)

**Congressional Black Caucus Political Action Committee**

|   |  |   |   |
|---|--|---|---|
| <b>A. Full Name, Mailing Address and ZIP Code</b><br><br><b>Anise Jenkins</b><br><b>2470 Rayburn HOB</b><br><b>Washington, D.C. 20515</b> | <b>Purpose of Disbursement</b><br><b>bookkeeping &amp; accounting</b><br><b>after working hours</b><br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | <b>Date (month, day, year)</b><br><br><b>11/29/82</b> | <b>Amount of Each Disbursement This Period</b><br><br><b>250.00</b> |
| <b>B. Full Name, Mailing Address and ZIP Code</b>   | <b>Purpose of Disbursement</b><br><br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):   | <b>Date (month, day, year)</b>                        | <b>Amount of Each Disbursement This Period</b>                      |
| <b>C. Full Name, Mailing Address and ZIP Code</b>   | <b>Purpose of Disbursement</b><br><br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):   | <b>Date (month, day, year)</b>                        | <b>Amount of Each Disbursement This Period</b>                      |
| <b>D. Full Name, Mailing Address and ZIP Code</b>   | <b>Purpose of Disbursement</b><br><br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):   | <b>Date (month, day, year)</b>                        | <b>Amount of Each Disbursement This Period</b>                      |
| <b>E. Full Name, Mailing Address and ZIP Code</b>   | <b>Purpose of Disbursement</b><br><br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):   | <b>Date (month, day, year)</b>                        | <b>Amount of Each Disbursement This Period</b>                      |
| <b>F. Full Name, Mailing Address and ZIP Code</b>   | <b>Purpose of Disbursement</b><br><br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):   | <b>Date (month, day, year)</b>                        | <b>Amount of Each Disbursement This Period</b>                      |
| <b>G. Full Name, Mailing Address and ZIP Code</b>   | <b>Purpose of Disbursement</b><br><br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):   | <b>Date (month, day, year)</b>                        | <b>Amount of Each Disbursement This Period</b>                      |
| <b>H. Full Name, Mailing Address and ZIP Code</b>   | <b>Purpose of Disbursement</b><br><br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):   | <b>Date (month, day, year)</b>                        | <b>Amount of Each Disbursement This Period</b>                      |
| <b>I. Full Name, Mailing Address and ZIP Code</b>   | <b>Purpose of Disbursement</b><br><br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):   | <b>Date (month, day, year)</b>                        | <b>Amount of Each Disbursement This Period</b>                      |
| <b>SUBTOTAL of Disbursements This Page (optional)</b>   |  |   | <b>250.00</b>   |
| <b>TOTAL This Period (last page this line number only)</b>  |  |   | <b>250.00</b>   |

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Page 1 of 1  
LINE NUMBER  
(Use separate sheet for each numbered line)

| <small>(Name of Lender on File)</small><br><b>Congressional Black Caucus Political Action Committee</b>   |  |  |  |                                    |  |  |  |  |  |
|---|--|--|--|------------------------------------|--|--|--|--|--|
| <b>A. Full Name, Mailing Address and ZIP Code of Loan Source</b><br><b>Julian C. Dixon, Democrat for Congress</b><br><b>1581 Roxbury Drive</b><br><b>Los Angeles, CA 90035</b><br><small>Election: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</small> | <b>Original Amount of Loan</b><br><br><b>1000.00</b>             | <b>Cumulative Payments To Date</b><br><br><b>- 0 -</b> | <b>Balance Outstanding at Close of This Period</b><br><br><b>1000.00</b> |                                    |  |  |  |  |  |
| <b>Terms:</b> Date Insured <u>1/29/82</u> Date Due <u>open</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><br>\$                      |  |  |                                    |  |  |  |  |  |
|   | <b>2. Full Name, Mailing Address and ZIP Code</b>                |  |  | <b>Name of Employer</b>            |  |  |  |  |  |
|   | <b>Occupation</b>  |  |  |                                    |  |  |  |  |  |
|   | <b>Amount Guaranteed Outstanding:</b><br>\$                      |  |  |                                    |  |  |  |  |  |
|   | <b>3. Full Name, Mailing Address and ZIP Code</b>                | <b>Name of Employer</b>                                |  |                                    |  |  |  |  |  |
|   | <b>Occupation</b>  |  |  |                                    |  |  |  |  |  |
|   | <b>Amount Guaranteed Outstanding:</b><br>\$                      |  |  |                                    |  |  |  |  |  |
|   | <b>B. Full Name, Mailing Address and ZIP Code of Loan Source</b> |  |  |                                    |  |  |  |  |  |
| <b>Original Amount of Loan</b>  |  |  |  | <b>Cumulative Payments To Date</b> |  | <b>Balance Outstanding at Close of This Period</b> |  |  |  |
| <b>Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</b>  |  |  |  |                                    |  |  |  |  |  |
| <b>Terms:</b> Date Insured _____ 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><br>\$                      |  |  |                                    |  |  |  |  |  |
|   | <b>2. Full Name, Mailing Address and ZIP Code</b>                |  |  |                                    |  | <b>Name of Employer</b>                            |  |  |  |
|   | <b>Occupation</b>  |  |  |                                    |  |  |  |  |  |
|   | <b>Amount Guaranteed Outstanding:</b><br>\$                      |  |  |                                    |  |  |  |  |  |
|   | <b>3. Full Name, Mailing Address and ZIP Code</b>                | <b>Name of Employer</b>                                |  |                                    |  |  |  |  |  |
|   | <b>Occupation</b>  |  |  |                                    |  |  |  |  |  |
|   | <b>Amount Guaranteed Outstanding:</b><br>\$                      |  |  |                                    |  |  |  |  |  |
|   | <b>SUBTOTALS This Period This Page (optional) . . . . .</b>      |  |  |                                    |  |  |  |  |  |
| <b>TOTALS This Period (last page in this line only) . . . . .</b>   |  |  |  |                                    |  | <b>1000.00</b>                                     |  |  |  |
| Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.  |  |  |  |                                    |  |  |  |  |  |

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Public Records Division

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Wash., DC 20463



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gton, D.C. 20002

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



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1551

Date Filmed 6/12/84 Camera No. --- 4

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