



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20561

THIS IS THE END OF TUE # 490

Date Filmed 2/8/79 Camera No. --- 2

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RECEIVED
FEDERAL ELEC
COMMISSION

BOCA RATON, FLA.
 (305) 391-7979
 CLEARWATER, FLA.
 (813) 461-2000
 FORT LAUDERDALE, FLA.
 (904) 392-3944
 HAVERTYVILLE, ME.
 (207) 452-4244
 HARRISBURG, PA.
 (717) 654-4200
 PITTSBURGH, PA.
 (412) 592-4200
 ALEXANDRIA, VA.
 (202) 576-9000

808544

Dear Sirs:

Pursuant to a conciliation agreement entered into with the Federal Election Commission in MUR 490, the following political action committees that I represent and that are listed below hereby amend their registration statements to indicate that they are all affiliated.

Concerned Citizens of Florida
Taxpayers for Better Government
Southwest Good Government
Alliance for Better Government
United Taxpayers for Good Government
Concerned Taxpayers for Better Government
Florida Citizens for a Better Government
Citizens for Effective Government
Southwest Citizens for Good Government
Concerned Pennsylvania Taxpayers
N. Y. Taxpayers United for a More Effective Congress
N. J. Citizens for Representative Government

Thank you for your cooperation in this matter.

Sincerely,

Loren A. Smith
Loren A. Smith

LAS:jf

BASKIN & SEARS

ATTORNEYS AND COUNSELLORS AT LAW

818 CONNECTICUT AVENUE, N.W.

WASHINGTON, D.C. 20006

DEC 19 1981 11:58

Christopher Tow, Esquire
Office of General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

PHILIP BASKIN*
PHILIP J. HARRIS**
DONALD L. HERSEOVITZ
LESTER A. KATZ
JOHN P. SEARS
JOHN S. WARD
*ADMITTED IN PA. ONLY
**ADMITTED IN VA. ONLY

BASKIN & SEARS
ATTORNEYS AND COUNSELLORS AT LAW
818 CONNECTICUT AVENUE, N.W.
WASHINGTON, D.C. 20006
(202) 551-1134
CABLE BASKIN WASH, D.C.

78 DEC 15

OFFICES IN:
BIRMINGHAM, ALA.
CHICAGO, ILL.
CLEVELAND, OHIO
DENVER, COLO.
FORT WORTH, TEX.
HARTFORD, CONN.
HARRISBURG, PA.
HONOLULU, HAWAII
LOS ANGELES, CALIF.
MEMPHIS, TENN.
NEW YORK, N.Y.
PHILADELPHIA, PA.
PITTSBURGH, PA.
RICHMOND, VA.
SAN FRANCISCO, CALIF.
WASHINGTON, D.C.

December 14, 1978

Registration Statement Section
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

608451

Dear Sirs:

Pursuant to a conciliation agreement entered into with the Federal Election Commission in MUR 490, the following political action committees that I represent and that are listed below hereby amend their registration statements to indicate that they are all affiliated.

Concerned Citizens of Florida
Taxpayers for Better Government
Southwest Good Government
Alliance for Better Government
United Taxpayers for Good Government
Concerned Taxpayers for Better Government
Florida Citizens for a Better Government
Citizens for Effective Government
Southwest Citizens for Good Government
Concerned Pennsylvania Taxpayers
N. Y. Taxpayers United for a More Effective Congress
N. J. Citizens for Representative Government

Thank you for your cooperation in this matter.

Sincerely,

Loren A. Smith

Loren A. Smith

LAS:jf

79040100255

7
BASKIN & SEARS
ATTORNEYS AND COUNSELLORS AT LAW
818 CONNECTICUT AVENUE, N. W.
WASHINGTON, D. C. 20006



PLEASE MAIL
EARLY FOR
CHRISTMAS

700 11300
h1 :21 81 01 090 21

Registration Statement Section
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION

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

November 8, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Loren Smith, Esq.
Lothlorien
Yorklyn, Delaware 19736

RE: MUR 490

Dear Mr. Smith:

The Commission has approved the conciliation agreement which was received from you on October 24, 1978. Accordingly, I have signed the agreement on behalf of the Commission. The conciliation agreement in effect closes this matter. A copy of it is enclosed for your information.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

Conciliation agreement

790401007258

1002-MUR-490

SENDER: Complete Items 1, 2, and 3. Add your address in the "RETURN TO" space on envelope.	
1. The following service is requested (check one). <input type="checkbox"/> Show to whom and date delivered. <input checked="" type="checkbox"/> Show to whom, date, and address of delivery. <input type="checkbox"/> RESTRICTED DELIVERY Show to whom and date delivered. <input type="checkbox"/> RESTRICTED DELIVERY Show to whom, date, and address of delivery. \$ (CONSULT POSTMASTER FOR FEES)	
2. ARTICLE ADDRESSED TO: Loren Smith, Esq. Lothlorien Yorklyn, Dela. 19736	
3. ARTICLE DESCRIPTION: Conciliation agreement	4. REGISTERED NO. 49046 CERTIFIED NO. 49046 INSURED NO.
5. I have received the article described above. SIGNATURE <input checked="" type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent Mrs. Loren A. Smith	
6. DATE OF DELIVERY 11/21/78	
7. ADDRESS (Complete only if requested)	
8. UNABLE TO DELIVER BECAUSE:	
9. CLERK'S INITIALS	

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Loren Smith, Esq.
Lothlorien
Yorklyn, Delaware 19786

RE: NLRB 403

Dear Mr. Smith:

The Commission has approved the conciliation agreement which was received from you on October 14, 1978. Accordingly, I have signed the agreement on behalf of the Commission. The conciliation agreement in effect closes this matter. A copy of it is enclosed for your information.

Sincerely,

William C. Olsaker
General Counsel

Enclosure

Conciliation agreement

C.T.
11/7/78

79040100259

GLC 5282

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Concerned Pennsylvania Taxpayers)
Committee)
Southwest Citizens for Good)
Government)
Southwest Good Government Committee)
Citizens for Effective Government)
New Jersey Citizens for Representative)
Government)
Alliance for Better Government)
United Taxpayers for Good Government)
Concerned Taxpayers for Better)
Government)
Florida Citizens for a Better)
Government)
Concerned Citizens of Florida)
Taxpayers Allied for Good Government)
New York Taxpayers United for a More)
Effective Congress)

MUR 490

CONCILIATION AGREEMENT

This matter having been initiated by the Commission in the normal course of its supervisory responsibilities and after an investigation, the Commission having found reasonable cause to believe that the above named committees violated 2 U.S.C. §433(b)((2);

WHEREFORE, the Commission and the Respondents, having duly entered into conciliation as provided for in 2 U.S.C. §437g(a)(5)(A), do hereby agree as follows:

- I. The Federal Election Commission has jurisdiction over the respondents and the subject matter of this case.
- II. The respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.
- III. The pertinent facts in this matter are as follows:
 - A. With the exception of Florida Citizens for Better

79040100260

Government and Concerned Citizens of Florida,
none of respondents' Statements of Organization
declare their affiliation with one another.

- B. Respondents' year end reports for 1977 reveal
that 75% of all contributors listed were dis-
closed by at least two different committees.
- C. Respondents' year end reports for 1977 reveal that
all contributors who gave to more than one of
the respondent committees gave to each committee
they contributed to the same amount on the same
day.
- D. Respondent committees all reportedly received
from Helen Gray, former treasurer of "Concerned
Pennsylvania Taxpayers", a \$100 contribution on
12/26/77.
- E. Respondents' Statement of Organization, Year End,
and Quarterly Reports and other communications reveal
a similarity in their presentation, typing and in
their style of writing.

WHEREFORE, Respondents agree that:

- A. The manner in which the respondent committees were
organized and operated was based on the legal
counsel they had received, causing them, without
willful intent, to violate 2 U.S.C. §433(b)(2) for
failure to disclose affiliation.

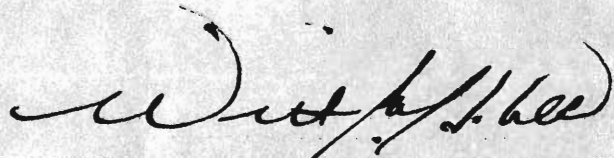
79040100261

- B. Respondents agree within thirty (30) days of the effective date of this agreement to file Amended Statements of Organization indicating their affiliation with one another.

IV. General Conditions

- A. The Commission, at the request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning matter involved herein, or on its own initiative, may review compliance with this agreement. If the Commission determines that this agreement has been violated, it may institute civil action for relief in the United States District Court for the District of Columbia pursuant to §437g(a)(7).
- B. It is mutually agreed that this conciliation agreement shall become effective on the date that all parties hereto have executed the same and the Commission has approved the entire agreement.

11/8/78
Date



William C. Oldaker
General Counsel
Federal Election Commission

10/18/78
Date



Loren Smith, Esquire
Attorney for the Respondents

79040100262

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 450
Concerned Pennsylvania Taxpayers)
Committee)
Southwest Citizens for Good)
Government)
Southwest Good Government Committee)
Citizens for Effective Government)
New Jersey Citizens for Representative)
Government)
Alliance for Better Government)
United Taxpayers for Good Government)
Concerned Citizens of Florida)
Florida Citizens for a Better)
Government)
Concerned Taxpayers for Better)
Government)
Taxpayers Allied for Good Government)
New York Taxpayers United for a More)
Effective Congress)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on November 7, 1978, the Commission determined by a vote of 5-0 to give final approval to the conciliation agreement attached to the General Counsel's memorandum dated November 2, 1978 and close the file in this matter.

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

Attest:

11/7/78

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in Office of Commission Secretary: 11-3-78, 7:45
Circulated on 48 hour vote basis: 11-3-78, 12:00

79040100263

November 2, 1978

MEMORANDUM TO: Marge Immons
FROM: Eileen T. Carr
SUBJECT: MDR 490

Please have the attached MDR and conciliation agreement distributed to the Commission on a 48 hour tally basis.

Thank you.

79040100264



FEDERAL ELECTION COMMISSION

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

November 2, 1978

MEMORANDUM

TO: The Commission

FROM: William C. Oldaker *[Signature]*

RE: MUR 490

On September 28, 1978, the Commission approved the attached conciliation agreement which has been signed by Loren Smith, the attorney for the defendants. The signed agreement was received by the Commission on October 24, 1978. The Office of General Counsel therefore recommends that the agreement be signed by the General Counsel and that this matter be closed.

Attachments

Conciliation Agreement
Letter

79040100265

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Concerned Pennsylvania Taxpayers
Committee
Southwest Citizens for Good
Government
Southwest Good Government Committee
Citizens for Effective Government
New Jersey Citizens for Representative
Government
Alliance for Better Government
United Taxpayers for Good Government
Concerned Taxpayers for Better
Government
Florida Citizens for a Better
Government
Concerned Citizens of Florida
Taxpayers Allied for Good Government
New York Taxpayers United for a More
Effective Congress

MUR 490

CONCILIATION AGREEMENT

This matter having been initiated by the Commission in the normal course of its supervisory responsibilities and after an investigation, the Commission having found reasonable cause to believe that the above named committees violated 2 U.S.C. §433(b)(2);

WHEREFORE, the Commission and the Respondents, having duly entered into conciliation as provided for in 2 U.S.C. §437g(a)(5)(A), do hereby agree as follows:

- I. The Federal Election Commission has jurisdiction over the respondents and the subject matter of this case.
- II. The respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.
- III. The pertinent facts in this matter are as follows:
 - A. With the exception of Florida Citizens for Better

Government and Concerned Citizens of Florida,
none of respondents' Statements of Organization
declare their affiliation with one another.

- B. Respondents' year end reports for 1977 reveal
that 75% of all contributors listed were dis-
closed by at least two different committees.
- C. Respondents' year end reports for 1977 reveal that
all contributors who gave to more than one of
the respondent committees gave to each committee
they contributed to the same amount on the same
day.
- D. Respondent committees all reportedly received
from Helen Gray, former treasurer of "Concerned
Pennsylvania Taxpayers", a \$100 contribution on
12/26/77.
- E. Respondents' Statement of Organization, Year End,
and Quarterly Reports and other communications reveal
a similarity in their presentation, typing and in
their style of writing.

WHEREFORE, Respondents agree that:

- A. The manner in which the respondent committees were
organized and operated was based on the legal
counsel they had received, causing them, without
willful intent, to violate 2 U.S.C. §433(b)(2) for
failure to disclose affiliation.

79040100267

- B. Respondents agree within thirty (30) days of the effective date of this agreement to file Amended Statements of Organization indicating their affiliation with one another.

IV. General Conditions

- A. The Commission, at the request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning matter involved herein, or on its own initiative, may review compliance with this agreement. If the Commission determines that this agreement has been violated, it may institute civil action for relief in the United States District Court for the District of Columbia pursuant to §437g(a)(7).
- B. It is mutually agreed that this conciliation agreement shall become effective on the date that all parties hereto have executed the same and the Commission has approved the entire agreement.

Date

William C. Oldaker
General Counsel
Federal Election Commission

Date

Loren A. Smith
Loren Smith, Esquire
Attorney for the Respondents



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Loren Smith, Esq.
Lothlorien
Yorklyn, Delaware 19736

RE: MUR 490

Dear Mr. Smith:

The Commission has approved the conciliation agreement which was received from you on October 24, 1978. Accordingly, I have signed the agreement on behalf of the Commission. The conciliation agreement in effect closes this matter. A copy of it is enclosed for your information.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

Conciliation agreement

79040100269

DELAWARE LAW SCHOOL
WIDENER COLLEGE

PO BOX 7474 • CONCORD PIKE
WILMINGTON, DELAWARE 19803



William C. Oldaker, Esq.
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Attention: Christopher Tow, Esq.



FEDERAL ELECTION COMMISSION

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

October 4, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Loren Smith, Esq.
Baskin and Sears
Attorneys and Counsellors at Law
818 Connecticut Avenue, N.W.
Washington, D.C. 20006

RE: MUR 490

Dear Mr. Smith:

Pursuant to your telephone conversation on September 8, 1978 with Christopher Tow, enclosed you will find a modified conciliation agreement that we are prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed conciliation agreement, please sign on behalf of your clients and return it to the Commission within ten days. I will then recommend that the Commission approve the agreement.

If you have any further questions or suggestions, please contact Christopher Y. Tow, the attorney assigned to this matter at (202) 523-4073.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

Conciliation Agreement (original)

79040100271

7 2 0 0 1 0 0 2

490 Low

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

<p>● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.</p>								
<p>1. The following service is requested (check one):</p> <p><input type="checkbox"/> Show to whom and date delivered.</p> <p><input checked="" type="checkbox"/> Show to whom, date, and address of delivery.</p> <p><input type="checkbox"/> RESTRICTED DELIVERY Show to whom and date delivered.</p> <p><input type="checkbox"/> RESTRICTED DELIVERY Show to whom, date, and address of delivery. \$</p> <p>(CONSULT POSTMASTER FOR FEES)</p>								
<p>2. ARTICLE ADDRESSED TO:</p> <p><i>Loewen Smith</i></p>								
<p>3. ARTICLE DESCRIPTION:</p> <table border="1"> <tr> <td>REGISTERED NO.</td> <td>CERTIFIED NO.</td> <td>INSURED NO.</td> </tr> <tr> <td> </td> <td> </td> <td> </td> </tr> </table> <p>(Always obtain signature of addressee or agent)</p> <p>I have received the article described above.</p> <p>SIGNATURE <input type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent</p>			REGISTERED NO.	CERTIFIED NO.	INSURED NO.			
REGISTERED NO.	CERTIFIED NO.	INSURED NO.						
<p>4. DATE OF DELIVERY</p>		<p>POSTMARK</p>						
<p>5. ADDRESS (Complete only if requested)</p>								
<p>6. UNABLE TO DELIVER BECAUSE:</p>		<p>CLERK'S INITIALS</p>						

12-750-1977-0-248-595

original letter to be sent to Loren Smith is
w/ Elissa. C.T.
9/20/78

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Loren Smith, Esq.
Baskin and Sears
Attorneys and Counsellors at Law
819 Connecticut Avenue, N.W.
Washington, D.C. 20006

RE: MUR 490

Dear Mr. Smith:

Pursuant to your telephone conversation on September 8, 1978 with Christopher Tow, enclosed you will find a modified conciliation agreement that we are prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed conciliation agreement, please sign on behalf of your clients and return it to the Commission within ten days. I will then recommend that the Commission approve the agreement.

If you have any further questions or suggestions, please contact Christopher Y. Tow, the attorney assigned to this matter at (202) 523-4073.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

Conciliation Agreement (original)

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Concerned Pennsylvania Taxpayers)
Committee)
Southwest Citizens for Good)
Government)
Southwest Good Government Committee)
Citizens for Effective Government)
New Jersey Citizens for Representative)
Government)
Alliance for Better Government)
United Taxpayers for Good Government)
Concerned Taxpayers for Better)
Government)
Florida Citizens for a Better)
Government)
Concerned Citizens of Florida)
Taxpayers Allied for Good Government)
New York Taxpayers United for a More)
Effective Congress)

MUR 490

CONCILIATION AGREEMENT

This matter having been initiated by the Commission in the normal course of its supervisory responsibilities and after an investigation, the Commission having found reasonable cause to believe that the above named committees violated 2 U.S.C. §433(b)((2);

WHEREFORE, the Commission and the Respondents, having duly entered into conciliation as provided for in 2 U.S.C. §437g(a)(5)(A), do hereby agree as follows:

- I. The Federal Election Commission has jurisdiction over the respondents and the subject matter of this case.
- II. The respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.
- III. The pertinent facts in this matter are as follows:
 - A. With the exception of Florida Citizens for Better

79040100274

Government and Concerned Citizens of Florida,
none of respondents' Statements of Organization
declare their affiliation with one another.

- B. Respondents' year end reports for 1977 reveal that 75% of all contributors listed were disclosed by at least two different committees.
- C. Respondents' year end reports for 1977 reveal that all contributors who gave to more than one of the respondent committees gave to each committee they contributed to the same amount on the same day.
- D. Respondent committees all reportedly received from Helen Gray, former treasurer of "Concerned Pennsylvania Taxpayers", a \$100 contribution on 12/26/77.
- E. Respondents' Statement of Organization, Year End, and Quarterly Reports and other communications reveal a similarity in their presentation, typing and in their style of writing.

WHEREFORE, Respondents agree that:

- A. The manner in which the respondent committees were organized and operated was based on the legal counsel they had received, causing them, without willful intent, to violate 2 U.S.C. §433(b)(2) for failure to disclose affiliation.

79040100275

- B. Respondents agree within thirty (30) days of the effective date of this agreement to file Amended Statements of Organization indicating their affiliation with one another.

IV. General Conditions

- A. The Commission, at the request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning matter involved herein, or on its own initiative, may review compliance with this agreement. If the Commission determines that this agreement has been violated, it may institute civil action for relief in the United States District Court for the District of Columbia pursuant to §437g(a)(7).
- B. It is mutually agreed that this conciliation agreement shall become effective on the date that all parties hereto have executed the same and the Commission has approved the entire agreement.

Date

William C. Oldaker
General Counsel
Federal Election Commission

Date

Loren Smith, Esquire
Attorney for the Respondents

79040100275

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Concerned Pennsylvania Taxpayers
Committee
Southwest Citizens for Good Government
Southwest Good Government Committee
Citizens for Effective Government
New Jersey Citizens for Representative
Government
Alliance for Better Government
United Taxpayers for Good Government
Concerned Taxpayers for Better Government
Florida Citizens for a Better Government
Concerned Citizens of Florida
Taxpayers Allied for Good Government
New York Taxpayers United for a More
Effective Congress

MUR 490

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on September 28, 1978, the Commission determined by votes of 5-0 to approve the conciliation agreement attached to the General Counsel's Report in the above-captioned matter signed September 15, 1978, and amended at the Executive Session of September 28, 1978.

Commissioner Tiernan was not present at the time of the vote.

Attest:

10/3/78

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

790401002277



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS
DATE: SEPTEMBER 20, 1978
SUBJECT: OBJECTION - 490 - General Counsel's
Report dated 9-15-78; Received
in Office of Commission Secretary:
9-15-78, 5:08

The above-named document was circulated on a 48
hour vote basis at 11:30, September 19, 1978.

Commissioner Harris submitted an objection at
3:15, this date, thereby placing MUR 490 on the Executive
Session Agenda for September 27, 1978.

A copy of Commissioner Harris' vote sheet is
attached.

ATTACHMENT:
Copy of vote sheet

cc: Commissioner Harris



79040100273

48 HOUR TALLY SHEET

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY



FEDERAL ELECTION COMMISSION

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

78 SEP 20 13:15

Date and Time Transmitted: Sept. 19, 1978 - 11:30

Commissioner

Harris

RETURN TO OFFICE OF COMMISSION SECRETARY BY: September 21, 1978 - 11:30

MUR No. 490 General Counsel's Report, dated September 15, 1978

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

COMMENTS:

PA after "Wherefore" is
unintelligible

Date: 9-20-78 Signature:

Thomas E. Harris

THE OFFICE OF GENERAL COUNSEL WILL TAKE NO ACTION IN THIS MATTER UNTIL THE APPROVAL OF FOUR COMMISSIONERS IS RECEIVED. PLEASE RETURN ALL PAPERS NO LATER THAN THE DATE AND TIME SHOWN ABOVE TO THE OFFICE OF COMMISSION SECRETARY. ONE OBJECTION PLACES THE ITEM ON THE EXECUTIVE SESSION AGENDA.



September 15, 1972

MEMORANDUM TO: Marge Emmons
FROM: Elissa S. Galt
SUBJECT: MUR 490

Please have the attached General Counsel's Report
on MUR 490 distributed to the Commission on a 24 hour
tally basis.

Thank you.

79040100280

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Concerned Pennsylvania Taxpayers)
Committee)
Southwest Citizens for Good)
Government)
Southwest Good Government Committee)
Citizens for Effective Government)
New Jersey Citizens for Representative)
Government)
Alliance for Better Government)
United Taxpayers for Good Government)
Concerned Taxpayers for Better)
Government)
Florida Citizens for a Better)
Government)
Concerned Citizens of Florida)
Taxpayers Allied for Good Government)
New York Taxpayers United for a More)
Effective Congress)

MUR 490

GENERAL COUNSEL'S REPORT

BACKGROUND

On August 3, 1978, the Commission found reasonable cause to believe that the respondent committees violated 2 U.S.C. §433(b)(2) for their failure to declare their affiliation with one another. A conciliation agreement was also approved on that date (the pertinent part is attached as Attachment I).

ANALYSIS

Since this time the Office of General Counsel has been conciliating with the respondents' attorney. The attached conciliation agreement represents the finalized version with a few modifications of the original. The following changes were made to the August 3, 1978 conciliation agreement (see Attachment I):

1. First paragraph A on page 2

The clause, "With the exception of Florida Citizens for Better Government and Concerned Citizens of Florida ..." has been added to the beginning of this paragraph. These two committees did in fact declare their affiliation with one another in their statements of organization.

2. Second paragraph A on page 2

The clause, "Based upon the advice of their legal counsel, respondents' organization and contributors pattern caused them without intent to be in violation of ..." has been added to the beginning of this paragraph. While there has been no evidence of respondents' intent here, their actions were based on the advice of their legal counsel. This section amounts to an admission of the violation.

3. Paragraph B on page 2

Insert this clause in place of the original: "Respondents agree within thirty (30) days of the effective date of this agreement to file Amended Statements of Organization indicating their affiliation with one another." In light of the fact that respondents' activities were caught at such an incipient stage and because no excessive contributions were made by respondents, the civil penalty has been deleted in favor of the above language.

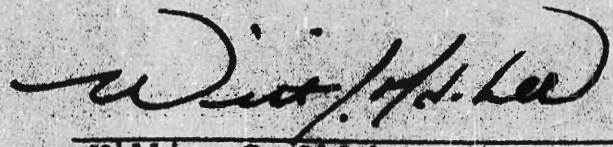
In consideration of the above facts, the Office of General Counsel recommends approval of the attached conciliation agreement.

79040100282

RECOMMENDATION

1. Approve the attached conciliation agreement
2. Send the attached letter.

9/15/78
Date


William C. Oldaker
General Counsel

Attachments

1. Attachment I
2. Conciliation Agreement
3. Letter to respondents' attorney

79040100283

ATTACHMENT I

Page 2 of Conciliation Agreement approved on August 3, 1978.

-2-

- 79040100284
- A. None of respondents' Statement of Organization declare their affiliation with one another.
 - B. Respondents' year end reports for 1977 reveal that 75% of all contributors listed were disclosed by at least two different committees.
 - C. Respondents' year end reports for 1977 reveal that all contributors who gave to more than one of the respondent committees gave to each committee they contributed to, the same amount on the same day.
 - D. Respondent committees all reportedly received from Helen Gray, former treasurer of "Concerned Pennsylvania Taxpayers", a \$100 contribution on 12/26/77.
 - E. Respondents' Statement of Organization, Year End, and Quarterly Reports and other communications reveal a similarity in their presentation, typing and in their style of writing.

WHEREFORE, Respondent agrees that:

- A. Respondents violated 2 U.S.C. §433(b)(2) for their failure to disclose their affiliation with one another on their Statements of Organization.
- B. Pursuant to 2 U.S.C. §437g(a)(b), Respondents agree to pay \$50 each as a civil penalty within thirty days of the effective date of this agreement. Payment shall be made to the Treasury of the United States.



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Loren Smith, Esq.
Baskin and Sears
Attorneys and Counsellors at Law
818 Connecticut Avenue, N.W.
Washington, D.C. 20006

RE: MUR 490

Dear Mr. Smith:

Pursuant to your telephone conversation on September 8, 1978 with Christopher Tow, enclosed you will find a modified conciliation agreement that we are prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed conciliation agreement, please sign on behalf of your clients and return it to the Commission within ten days. I will then recommend that the Commission approve the agreement.

If you have any further questions or suggestions, please contact Christopher Y. Tow, the attorney assigned to this matter at (202) 523-4073.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

Conciliation Agreement (original)

79040100285

600 4604

RECEIVED
FEDERAL ELECTION
COMMISSION

BASKIN & SEARS

ATTORNEYS AND COUNSELLORS AT LAW

818 CONNECTICUT AVENUE, N.W.

WASHINGTON, D. C. 20006

(202) 331-1174

CABLE BASKIN WASH. D. C.

August 16, 1978

PHILIP BASKIN*
PHILIP J. HARE**
DONALD L. HERSEVITZ
LESTER A. KATZ
JOHN P. SEARS
JOHN S. WARD
*ADMITTED IN PA. ONLY
**ADMITTED IN VA. ONLY

OFFICES IN:
BOCA RATON, FLA.
(305) 440-7000
CLEARWATER, FLA.
(813) 440-7000
PALM BEACH, FLA.
(305) 833-0000
HYATTSVILLE, MD.
(301) 440-7000
HARRISBURG, PA.
(717) 540-7000
PITTSBURGH, PA.
(412) 540-7000
ALEXANDRIA, VA.
(703) 540-7000

AUG 22 AM 11

William C. Oldaker, Esquire
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

805585

Re: MUR 490

Dear Mr. Oldaker:

Pursuant to our phone conversation of Friday, August 11, I have discussed the conciliation agreement with my clients in MUR 490. While there is a strong feeling that they are affiliated in no actual sense, they are willing to resolve this matter by my signing the conciliation agreement with three technical modifications. These amendments are included on the attached sheet. These amendments are in addition to a fourth amendment deleting the fine. Because of the nature of the complaint proceeding my clients find the fine unacceptable. Therefore, if the Commission will accept the conciliation agreement as drafted and amended and delete the call for a fine, we can conclude this matter so you can proceed on to more pressing litigation and matters.

I will await your response.

Sincerely,

Loren A. Smith, Jr.
Loren A. Smith

LAS:jf
Enclosures

79040100285

ATTACHMENT

AMENDMENTS TO CONCILIATION

STATEMENT IN MUR490-(78)

Page 2.

(A) Add "[W]ith the exception of Florida Citizens for Better Government and Concerned Citizens of Florida,..." [continue on with language]

Page 2.

(E) Delete. [Reason: This was admitted to the Federal Election Commission before the MUR was initiated since common counsel for all these committees namely, our firm, dealt with the Commission staff in such capacity as common counsel and there was no attempt to conceal the fact that all documents were prepared in common by our firm.]

Page 2.

After the "agrees that" in section (A), change to read: "Based upon the advice of their legal counsel, respondents' organization and contributors pattern caused them without intent to be in violation of..." [resume with Commission language at 2 U.S.C. §433(b)(2)].

Page 2.

(B) Delete. [Fine]. Add the following: "(B) Respondents agree within thirty (30) days of the effective date of this agreement to file Amended Statements of Organization indicating their affiliation with one another."

79040100287

- 7 9 0 4 0 1 0 0 2 8 8
- A. With the exception of Florida Citizens for Better Government and Concerned Citizens of Florida, none of respondents' Statement of Organization declare their affiliation with one another.
 - B. Respondents' year end reports for 1977 reveal that 75% of all contributors listed were disclosed by at least two different committees.
 - C. Respondents' year end reports for 1977 reveal that all contributors who gave to more than one of the respondent committees gave to each committee they contributed to, the same amount on the same day.
 - D. Respondent committees all reportedly received from Helen Gray, former treasurer of "Concerned Pennsylvania Taxpayers", a \$100 contribution on 12/26/77.

WHEREFORE, Respondent agrees that:

- A. Based upon the advice of their legal counsel, respondents' organization and contributors pattern caused them without intent to be in violation of 2 U.S.C. §433(b)(2) for their failure to disclose their affiliation with one another on their Statements of Organization.
- B. Respondents agree within thirty (30) days of the effective date of this agreement to file Amended Statements of Organization indicating their affiliation with one another.

BEFORE THE FEDERAL ELECTION COMMISSION
July 25, 1978

In the Matter of)
)
Concerned Pennsylvania Taxpayers)
Committee)
Southwest Citizens for Good)
Government)
Southwest Good Government Committee)
Citizens for Effective Government)
New Jersey Citizens for Representative)
Government)
Alliance for Better Government)
United Taxpayers for Good Government)
Concerned Taxpayers for Better)
Government)
Florida Citizens for a Better)
Government)
Concerned Citizens of Florida)
Taxpayers Allied for Good Government)
New York Taxpayers United for a More)
Effective Congress)

MUR 490

CONCILIATION AGREEMENT

This matter been initiated by the Commission in the normal course of its supervisory responsibilities and after an investigation, the Commission having found reasonable cause to believe that the above named committees violated 2 U.S.C. §433(b)(2);

WHEREFORE, the Commission and the Respondents, having duly entered into conciliation as provided for in 2 U.S.C. §437g(a)(5)(A), do hereby agree as follows:

- I. The Federal Election Commission has jurisdiction over the Respondents and the subject matter of this case.
- II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.
- III. The pertinent facts in this matter are as follows:

- 79040100290
- A. None of respondents' Statement of Organization declare their affiliation with one another.
 - B. Respondents' year end reports for 1977 reveal that 75% of all contributors listed were disclosed by at least two different committees.
 - C. Respondents' year end reports for 1977 reveal that all contributors who gave to more than one of the respondent committees gave to each committee they contributed to, the same amount on the same day.
 - D. Respondent committees all reportedly received from Helen Gray, former treasurer of "Concerned Pennsylvania Taxpayers", a \$100 contribution on 12/26/77.
 - E. Respondents' Statement of Organization, Year End, and Quarterly Reports and other communications reveal a similarity in their presentation, typing and in their style of writing.

WHEREFORE, Respondent agrees that:

- A. Respondents violated 2 U.S.C. §433(b)(2) for their failure to disclose their affiliation with one another on their Statements of Organization.
- B. Pursuant to 2 U.S.C. §437g(a)(b), Respondents agree to pay \$50 each as a civil penalty within thirty days of the effective date of this agreement. Payment shall be made to the Treasury of the United States.

IV. General Conditions

- A. The Commission, at the request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning matters involved herein, or on its own initiative, may review compliance with this agreement. If the Commission determines that this agreement has been violated, it may institute civil action for relief in the United States District Court for the District of Columbia pursuant to §437g(a)(7).
- B. It is mutually agreed that this conciliation agreement shall become effective on the date that all parties hereto have executed the same and the Commission has approved the entire agreement.

79040100291

Date

William C. Oldaker
General Counsel
Federal Election Commission

Date

Loren Smith, Esquire
Attorney for the Respondents

7 9 0 4 0 1 0 0 2 9 2

BASKIN & SEARS

**NEYS AND COUNSELLORS AT LAW
CONNECTICUT AVENUE, N.W.
WASHINGTON, D.C. 20006**



AUG 22 AM 11:27

William G. Oldaker, Esquire
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION

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

August 7, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Loren Smith, Esquire
Baskin and Sears
Attorneys and Counsellors at Law
818 Connecticut Avenue, N.W.
Washington, D.C. 20006

RE: MUR 490

Dear Mr. Smith:

On August 3, 1978, the Commission determined there was reasonable cause to believe that the committees you are representing committed a violation of 2 U.S.C. §433(b)(2) of the Federal Election Campaign Act of 1971, as amended. Specifically, the Commission found reasonable cause to believe that the committee failed to declare their affiliation with one another pursuant to 2 U.S.C. §433(b)(2).

The Commission has a duty to attempt to correct such violations for a period of 30 days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. If we are unable to reach an agreement during that period the Commission may, upon a finding of probable cause to believe a violation has occurred, institute civil suit in United States District Court and seek payment of a civil penalty not in excess of \$5000.

We enclose a conciliation agreement that this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed conciliation agreement, please sign and return it along with the civil penalty to the Commission within ten days. I will then recommend that the Commission approve the agreement.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Christopher Tow, the attorney assigned to this matter at (202) 523-4073.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

NYK 490-TOW

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

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

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

2. ARTICLE ADDRESSED TO:
*Loren Smith Esq.
Banker and Solicitor
Attorney & Counselor at Law
New Haven, Conn. 06510*

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
438636

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
John J. Smith

DATE OF DELIVERY *2/8/78* POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

BEFORE THE FEDERAL ELECTION COMMISSION
July 25, 1978

In the Matter of)
Concerned Pennsylvania Taxpayers)
Committee)
Southwest Citizens for Good)
Government)
Southwest Good Government Committee)
Citizens for Effective Government)
New Jersey Citizens for Representative)
Government)
Alliance for Better Government)
United Taxpayers for Good Government)
Concerned Taxpayers for Better)
Government)
Florida Citizens for a Better)
Government)
Concerned Citizens of Florida)
Taxpayers Allied for Good Government)
New York Taxpayers United for a More)
Effective Congress)

MUR 490

CONCILIATION AGREEMENT

This matter been initiated by the Commission in the normal course of its supervisory responsibilities and after an investigation, the Commission having found reasonable cause to believe that the above named committees violated 2 U.S.C. §433(b)(2);

WHEREFORE, the Commission and the Respondents, having duly entered into conciliation as provided for in 2 U.S.C. §437g(a)(5)(A), do hereby agree as follows:

- I. The Federal Election Commission has jurisdiction over the Respondents and the subject matter of this case.
- II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.
- III. The pertinent facts in this matter are as follows:

79040100295

- 79040100295
- A. None of respondents' Statement of Organization declare their affiliation with one another.
 - B. Respondents' year end reports for 1977 reveal that 75% of all contributors listed were disclosed by at least two different committees.
 - C. Respondents' year end reports for 1977 reveal that all contributors who gave to more than one of the respondent committees gave to each committee they contributed to, the same amount on the same day.
 - D. Respondent committees all reportedly received from Helen Gray, former treasurer of "Concerned Pennsylvania Taxpayers", a \$100 contribution on 12/26/77.
 - E. Respondents' Statement of Organization, Year End, and Quarterly Reports and other communications reveal a similarity in their presentation, typing and in their style of writing.

WHEREFORE, Respondent agrees that:

- A. Respondents violated 2 U.S.C. §433(b)(2) for their failure to disclose their affiliation with one another on their Statements of Organization.
- B. Pursuant to 2 U.S.C. §437g(a)(b), Respondents agree to pay \$50 each as a civil penalty within thirty days of the effective date of this agreement. Payment shall be made to the Treasury of the United States.

IV. General Conditions

- A. The Commission, at the request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning matters involved herein, or on its own initiative, may review compliance with this agreement. If the Commission determines that this agreement has been violated, it may institute civil action for relief in the United States District Court for the District of Columbia pursuant to §437g(a)(7).
- B. It is mutually agreed that this conciliation agreement shall become effective on the date that all parties hereto have executed the same and the Commission has approved the entire agreement.

79040100297

Date

William C. Oldaker
General Counsel
Federal Election Commission

Date

Loren Smith, Esquire
Attorney for the Respondents

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 490 (78)
)
Concerned Pennsylvania Taxpayers)
Committee)
Southwest Citizens for Good)
Government)
Southwest Good Government Committee)
Citizens for Effective Government)
New Jersey Citizens for Representative)
Government)
Alliance for Better Government)
United Taxpayers for Good Government)
Concerned Taxpayers for Better)
Government)
Florida Citizens for a Better)
Government)
Concerned Citizens of Florida)
Taxpayers Allied for Good Government)
New York Taxpayers United for a More)
Effective Government)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on August 3, 1978, the Commission approved by a vote of 5-0 the following recommendations of the General Counsel in the above-captioned matter:

1. Find reasonable cause to believe that the respondents violated 2 U.S.C. §433(b) (2).
2. Approve conciliation agreements attached to the General Counsel's Report, signed July 31, 1978.
3. Send the letters attached to the General Counsel's Report, signed July 31, 1978.

79040100298

Voting in this matter were Commissioners Tiernan,
Staebler, Thomson, Harris, and Springer.

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission



Received in Office of Commission Secretary: 7-31-78, 5:04
Circulated on 48 hour vote basis: 8-1-79, 12:00

79040100299

July 31, 1978

MEMORANDUM TO: Marge Evans
FROM: Elisea T. Garry
SUBJECT: MEX 496

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

Thank you.

79040100300

BEFORE THE FEDERAL ELECTION COMMISSION
July 25, 1978

In the Matter of)
Concerned Pennsylvania Taxpayers)
Committee)
Southwest Citizens for Good)
Government)
Southwest Good Government Committee)
Citizens for Effective Government)
New Jersey Citizens for Representative)
Government)
Alliance for Better Government) MUR 490
United Taxpayers for Good Government)
Concerned Taxpayers for Better)
Government)
Florida Citizens for a Better)
Government)
Concerned Citizens of Florida)
Taxpayers Allied for Good Government)
New York Taxpayers United for a More)
Effective Congress)

GENERAL COUNSEL'S REPORT

BACKGROUND

On May 3, 1978, the Commission found reason to believe that the above named committees are in violation of 2 U.S.C. §433(b)(2) for their failure to disclose their affiliation with one another.

ANALYSIS

Since this date, a number of communications between the Office General Counsel and the respondent's attorney have taken place. The respondent's position is that the similarities in the mailings and in the reports of the committees can be attributed to the fact that they are all clients of one law firm, Baskin and Sears. Concerning the similarities in contributions to the committees, it was explained that potential contributors ask John Sears of Baskin and Sears for guidance as to how to get involved in the political process. Apparently Sears would refer them to these committees.

As for their financial activity, the total collected by them amounted to nearly \$33,000. The highest collected by any one committee was \$5,605.00 while the lowest was \$350.00. According to quarterly reports for July 10, 1978, eleven of the committees still in existence at that time were terminated. (One committee terminated on May 22, 1978 with no activity and a zero balance and one committee has not yet filed a quarterly report.) These latest reports also reveal that the committees made contributions of \$1000 or less to a wide variety of candidates and committees, thereby reducing their cash on hand to zero. No single candidate or committee is receiving in excess of \$1000 from the respondents.

It should be noted that if the situation had not come to the attention of the Commission, it is possible that much larger amounts of money could have been accumulated and subsequently contributed by the committees. Since they were scattered throughout the country, it would have been difficult to gather them together in order to make the comparisons which were made (see the General Counsel's Report certified on May 3, 1978). Therefore, the Office of General Counsel recommends that the Commission find reasonable cause to believe the respondents violated 2 U.S.C. §433(b)(2). However, in light of the fact that this activity was discovered in its early stages, we recommend that the Commission approve the attached conciliation agreement with a civil penalty of \$50.00 for each committee.

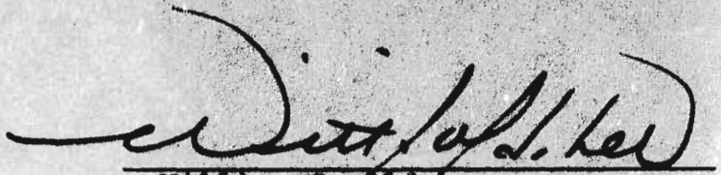
79090100302

RECOMMENDATION

1. Find reasonable cause to believe that the respondents violated 2 U.S.C. §433(b)(2).
2. Approve the attached conciliation agreement.
3. Send the attached letters.

Date:

7/31/78



William C. Oldaker
General Counsel

79040100303



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Loren Smith, Esquire
Baskin and Sears
Attorneys and Counsellors at Law
818 Connecticut Avenue, N.W.
Washington, D.C. 20006

RE: MUR 490

Dear Mr. Smith:

On , 1978, the Commission determined there was reasonable cause to believe that the committees you are representing committed a violation of 2 U.S.C. §433(b)(2) of the Federal Election Campaign Act of 1971, as amended. Specifically, the Commission found reasonable cause to believe that the committee failed to declare their affiliation with one another pursuant to 2 U.S.C. §433(b)(2).

The Commission has a duty to attempt to correct such violations for a period of 30 days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. If we are unable to reach an agreement during that period the Commission may, upon a finding of probable cause to believe a violation has occurred, institute civil suit in United States District Court and seek payment of a civil penalty not in excess of \$5000.

We enclose a conciliation agreement that this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed conciliation agreement, please sign and return it along with the civil penalty to the Commission within ten days. I will then recommend that the Commission approve the agreement.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Christopher Tow, the attorney assigned to this matter at (202) 523-4073.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

RECEIVED
FEDERAL ELECTION COMMISSION

BASKIN & SEARS

ATTORNEYS AND COUNSELLORS AT LAW

816 CONNECTICUT AVENUE, N.W.

WASHINGTON, D.C. 20006

(202) 331-1174

CABLE BASKIN WASH. D.C.

OFFICES IN:

- BOCA RATON, FLA.
(305) 391-7871
- CLEARWATER, FLA.
(813) 441-0937
- PALM BEACH, FLA.
(305) 839-2377
- HYATTSVILLE, MD.
(301) 488-8800
- HARRISBURG, PA.
(717) 224-9922
- PITTSBURGH, PA.
(412) 582-8800
- ALEXANDRIA, VA.
(202) 678-1700

- PHILIP BASKIN*
- PHILIP J. HARE**
- DONALD L. HERSEVITZ
- LESTER A. KATZ
- JOHN P. SEARS
- JOHN S. WARD
- *ADMITTED IN PA. ONLY
- **ADMITTED IN VA. ONLY

July 28, 1978

BY HAND

604885

Christopher Tow, Esquire
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR490-(78)

Dear Chris:

Pursuant to our various discussions and letters on MUR490-(78), I am reducing to writing the basic reasons why I very strongly feel no action should be taken by the Commission. By no action I mean no conciliation agreement or fine. Our clients, as I previously indicated, would be willing, however, to amend their Registration Statements to indicate affiliation; though this willingness is reluctant since they do not believe themselves affiliated with anybody. Such an amendment would, I think, be a fair settlement to this matter and serve the interest of the law.

To summarize our reasons why MUR490-(78) should be dismissed I note first that the good faith of the committees is apparent on the face of their reports. The committees reported every single contribution, even those of \$100 or below. Much of the commonality of contributions, such as existed, came to light because the committees were totally open. If some evil design or secret plan of affiliation were involved these committees could easily have accomplished it by not reporting those contributions, as they had a legal right to do. This, of course, was not done.

Second, if affiliation is involved here, it comes about by operation of law, not conscious design. These committees and treasurers were a disparate group. None had

2001010303

BASKIN & SEARS

Christopher Tow, Esquire
July 29, 1978
Page Two

any reason to believe or any way of knowing that they were or might be considered affiliated. They didn't know each other in most instances. The commonality came from most knowing of John P. Sears of our firm and using him as a lawyer. To the extent that several individuals gave money to more than one of the committees is explained by two causes: (1) knowing various persons in the other committees; and (2) seeking Mr. Sears' advice on what other PACs were available to contribute to. I am sure that many of these individuals gave other contributions, not in question here, to various other PACs and candidates not reported by our firm.

If the mere giving of advice to a client on what PACs were available to contribute to constitutes affiliation, then this should be put down in prospective regulation, not made the basis of retroactive complaints. While clearly I see the complaint of the Commission in this case, the Commission must recognize the very difficult problem this client creates for a new firm and its clients. Our clients, acting upon the legal advice of our firm, the best advice we could garner from the regs and the Act, and having no possible way of knowing any relationship they might have with any other committee did not indicate affiliation on their Registration Statements. If this action is now made the basis of a punitive complaint proceeding, the client has every reason to believe he or she was trapped by the law. While an amended statement may be quite proper, a conciliation agreement or fine would be most unfair, as well as raising basic problems about the limits of the attorney-client relationship. It would be most unfair to make the client suffer because of who his attorney's other clients are.

Very truly yours,

Loren A. Smith

Loren A. Smith

LAS:jf

BASKIN & SEARS

ATTORNEYS AND COUNSELLORS AT LAW

818 CONNECTICUT AVENUE, N. W.

WASHINGTON, D. C. 20006

13 JUL 21 12:58

Christopher Tow, Esquire
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

BY HAND



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *MWE*
SUBJECT: INTERIM REPORT ON MUR 490
DATE: JUNE 30, 1978

The above-mentioned document was circulated on a 24 hour no-objection basis at 1:32 p.m. on June 29, 1978.

As of 4:15 p.m. this date, no objections have been received in the Office of Commission Secretary to the Interim Report on MUR 490.

79040100308

June 28, 1954

MEMORANDUM TO: Major General
FROM: William F. Hall
SUBJECT: MUR 430

Please have the attached Interim Report on
MUR 430 distributed to the Committee on a 24 hour
no-objection basis.

Thank you.

79040100300

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Concerned Pennsylvania Taxpayers
Committee
Southwest Citizens for Good
Government
Southwest Good Government Committee
Citizens for Effective Government
New Jersey Citizens for Representative
Government
Alliance for Better Government
United Taxpayers for Good Government
Taxpayers for Better Government
Concerned Taxpayers for Better
Government
Florida Citizens for a Better
Government
Concerned Citizens of Florida
Taxpayers Allied for Good Government
New York Taxpayers United for a More
Effective Congress

MUR 490

Interim Report

As previously reported, the Commission found reason to believe on May 3, 1978, that the above named committees are in violation of 2 U.S.C. §433(b)(2) for their failure to disclose their affiliation with one another. An interim report was distributed to the Commission on a no-objection basis on June 1, 1978.

Since the last report, there have been a number of communications between Loren Smith, attorney for the respondent committees, and the Office of General Counsel. Smith has indicated that the committees will declare their affiliation if the Commission will close this matter. Mr. Smith has not yet communicated an acceptable defense to the Commission's finding of reason to believe a violation of 2 U.S.C. §434(b)(2) was committed by his client committees.

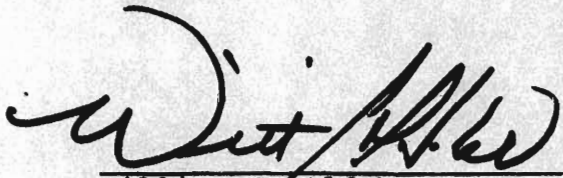
79040100310

In light of these facts, we stated to Smith our position in a June 21, 1978 telephone conversation. Smith was informed that the Office of General Counsel will recommend that the Commission find reasonable cause to believe a violation of 2 U.S.C. §433(b)(2) has occurred in this matter unless he is able to provide evidence why such a determination should not be made. He expressed his understanding of this and agreed to mail a letter sometime this week explaining specifically why the committees are not affiliated.

The Office of General Counsel is presently awaiting this letter and will recommend an appropriate action after it has been received and assessed.

79040100311
Date

6/24/78


William C. Oldaker
General Counsel

Information Re: D-44

June 21, 1978

REPORTS ANALYSTS

ROBERTO GARCIA *RG*
MARK KLEINMAN *MK*

MEMORANDUM TO: BILL OLDAKER

THROUGH: ORLANDO POTTER *OP*
TOM HASELHORST *TJH*

FROM: STEVE MIMS *SM 6/19/78*

SUBJECT: UPDATE MUR #490

Included in the update for MUR #490 are the following listed
in their respective order.

1. UPDATE SUMMARY --- A brief overview of new information received and matters of interest based upon a review of all information available, relating to the committees.
2. A LISTING OF NEW ATTACHMENTS --- Included with suitable explanations.
3. UPDATE OF PREVIOUSLY REPORTED MATTERS --- Only new information has been included. Anything not contained, but previously reported remains the same, inclusive of this update.
4. NEW ATTACHMENTS --- As listed in 2. with documentation.

79040100312

UPDATE SUMMARY

Reporting Matters:

Since the first report on matters relating to MUR #490, all of the committees involved have filed reports covering the activity 1/1/78-3/31/78(the April 10 Quarterly Report). In one instance, Taxpayers Allied for Good Government(Committee L), they filed a Termination Report including all activity since 1/1/78 up to 5/15/78.

In addition, several RFAIs were sent by the Non-Party Team relating to inadequacies discovered on the Year End Reports and responses were received from the committees. Also a few RFAIs were sent relating to the 1st Quarter Report, but no responses have been received as of yet.

Findings related to 1st Quarter Reports:

The 1st Quarter Reports were notably similar, in listing \$50 as unitemized operating expenditures. A conversation with an attorney from the law firm of Baskin and Sears, in response to an RFAI sent relating to the 1st Quarter Report revealed that the \$50 represented attorney fees.

Findings related to responses to RFAIs for Year End Reports:

In all cases, in which RFAIs were sent relating to the Year End Report, we received back answers with a Washington D.C. Postmark. In addition, in each case, the Treasurer failed to sign the response.

79040100313

Contributor Information:

There are now a total of 50 contributors to the committees, of which 12 appeared on 1st Quarter Report for the first time.

A breakdown reveals the following:

<u>No. of Contributors</u>	<u>Gave To</u>
6	1 Committee
20	2 Committees
11	3 Committees
8	4 Committees
2	6 Committees
2	7 Committees
1	11 Committees

A total of 156 Contributions were received totaling almost \$33,000.

Of these(156)

87 were made on the same day

69 were made on different days

of these 15 were made on different reports(Year End and 1st Quarter)

Findings Contributor Information:

On the Year End Reports, there were discovered contributions received by the committees, prior to the date of registration. Included on the 1st Quarter Report of six committees was one contributor, who had actually contributed within the coverage dates of the Year End Report.

79040100314

Breakdown of Contributions by State:

85% of all of the contributions to committees are out-of-state, based upon address of committees.

156 total contributions were made
132 were from out-of-state
24 were within state

Committee base:(of the thirteen committees)

<u>State</u>	<u>No. of committees</u>
CA	1
FL	4
NJ	1
NY	3
PA	4

Contributors, state of habitat:(of 50 contributors)

<u>State</u>	<u>No. of contributors</u>
AZ	2
CA	4
DC	1
FL	4
KY	2
MA	5
MD	2
MI	2
NJ	1
NY	2
PA	3
SC	3
TX	11
VA	9

In-state Contributors to Committees:

<u>Committee(State)</u>	<u>In-state contributors</u>
A(PA)	3 out of 3
B(CA)	3 out of 20
C(FL)	0 out of 18
D(PA)	1 out of 25
E(NJ)	1 out of 4
F(NY)	0 out of 22
G(PA)	1 out of 22
H(NY)	1 out of 8
I(PA)	3 out of 3
J(FL)	4 out of 5
K(FL)	4 out of 5
* L	
* M	

* Available information incomplete for purposes of chart

A LISTING OF NEW ATTACHMENTS

- ATTACHMENT #11 --- Documents sent by the committees having Washington, D.C. Postmarks.**
- ATTACHMENT #12 --- Documents sent by the committees which included registered P.B. Meter IDs used for payment of postage.**
- ATTACHMENT #13 --- Envelopes and Reports with return address same for corporation, treasurer and contributor.**
- ATTACHMENT #14 --- Telecons relating to an RFAI disclosing the explanation for the \$50 unitized operating expenditures.**

79040100316

Candidate/Committee CONCERNED PENNSYLVANIA TAXPAYERS COMMITTEE
Treasurer Helen Gray
Address 664 Ridgefield Ave., PA 15216

Report Type	Coverage Dates	Receipts	Expenditures	Cash On Hand	Debts
Year End	12/26-12/31/77	1,100	0	1,100	0
1st Quarter	1/1-3/31/78	1,000	50	2,050	0
Total		2,100	50	2,050	0

NOTE: ALLEGATIONS REMAIN THE SAME

HISTORY:

ALL PREVIOUS CITES BECOME 100%(of the eleven committees Delete Committee L)

79040100317

Candidate/Committee SOUTHWEST CITIZENS FOR GOOD GOVERNMENT
 Treasurer Arnold Roland
 Address 7350 Caminito Carlotta, CA. 92121

Report Type	Coverage Dates	Receipts	Expenditures	Cash On Hand	Debts
Year End	12/26-12/31/77	3,725	0	3,725	0
1st Quarter	1/1-3/31/78	840	50	4,515	0
Total		4,565	50	4,515	0

NOTE: ALLEGATIONS REMAIN THE SAME

HISTORY:

ALL PREVIOUS CITES BECOME 100%(of the eleven committees Delete Committee L)

70040100313

Candidate/Committee SOUTHWEST GOOD GOVERNMENT COMMITTEE
 Treasurer Joel Mann
 Address 13150 S.W. 71st Avenue, Miami, FL

Report Type	Coverage Dates	Receipts	Expenditures	Cash On Hand	Debts
Year End	12/26-12/31/77	3,225	0	3,225	0
1st Quarter	1/1-3/31/78	830	50	4,005	0
Total		4,055	50	4,005	0

NOTE: ALLEGATIONS REMAIN THE SAME

HISTORY:

ALL PREVIOUS CITES BECOME 100%(of the eleven committees Delete Committee L)

79040100319

Candidate/Committee CITIZENS FOR EFFECTIVE GOVERNMENT
 Treasurer David Prager
 Address 1394 N. 39th Street, Allentown, PA 18104

Report Type	Coverage Dates	Receipts	Expenditures	Cash On Hand	Debts
Year End	12/26-12/31/77	2,875	0	2,875	0
1st Quarter	1/1-3/31/78	1,950	50	4,775	0
Total		4,825	50	4,775	0

NOTE: ALLEGATIONS REMAIN THE SAME

HISTORY:

ALL PREVIOUS CITES BECOME 100%(of the eleven committees Delete Committee L)

79040190320

Candidate/Committee NEW JERSEY CITIZENS FOR REPRESENTATIVE GOVERNMENT
 Treasurer Carole Lippert
 Address Marie Major Drive; Alpine, NJ 07620

Report Type	Coverage Dates	Receipts	Expenditures	Cash On Hand	Debts
Year End	12/26-12/31/77	2,100	0	2,100	0
1st Quarter	1/1-3/31/78	0	50	2,050	0
Total		2,100	50	2,050	0

NOTE: ALLEGATIONS REMAIN THE SAME

HISTORY:

ALL PREVIOUS CITES BECOME 100%(of the eleven committees Delete Committee L)

79040100321

Candidate/Committee ALLIANCE FOR BETTER GOVERNMENT
 Treasurer Marcia Cohan
 Address 381 Woodmere Blvd.; Woodmere, NY

Report Type	Coverage Dates	Receipts	Expenditures	Cash On Hand	Debt
Year End	12/26-12/31/77	1,700	0	1,700	0
1st Quarter	1/1-3/31/78	3,905	50	5,555	0
Total		5,605	50	5,555	0

NOTE: ALLEGATIONS REMAIN THE SAME

HISTORY:

ALL PREVIOUS CITES BECOME 100%(of the eleven committees Delete Committee L)

7904010032

Candidate/Committee UNITED TAXPAYERS FOR GOOD GOVERNMENT

Treasurer Barbara Schwartz

Address 4024 Mac Niff, Lafayette Hill, PA 19444

Report Type	Coverage Dates	Receipts	Expenditures	Cash On Hand	Debts
Year End	12/26-12/31/77	1,650	0	1,650	0
1st Quarter	1/1-3/31/78	2,100	50	3,700	0
Total		3,750	50	3,700	0

NOTE: ALLEGATIONS REMAIN THE SAME

HISTORY:

ALL PREVIOUS CITES BECOME 100%(of the eleven committees Delete Committee L)

79040100323

Candidate/Committee TAXPAYERS FOR BETTER GOVERNMENT
 Treasurer Jerome Levian
 Address 35 Wilmington Drive, Dix Hills, NY 11746

Report Type	Coverage Dates	Receipts	Expenditures	Cash On Hand	Debts
Year End	12/26-12/31/77	1,175	0	1,175	0
1st Quarter	1/1-3/31/78	2 200	50	1,325	0
Total		1,375	50	1,325	0

NOTE: ALLEGATIONS REMAIN THE SAME

HISTORY:

ALL PREVIOUS CITES BECOME 100%(of the eleven committees Delete Committee L)

79040100324

Candidate/Committee CONCERNED TAXPAYERS FOR BETTER GOVERNMENTTreasurer James NicoteroAddress 978 Center Oak Drive, Pittsburgh, PA 15237

Report Type	Coverage Dates	Receipts	Expenditures	Cash On Hand	Debts
Year End	12/26-12/31/77	1,000	00	1,000	0
1st Quarter	1/1-3/31/78	950	50	1,900	0
Total		1,950	50	1,900	0

NOTE: ALLEGATIONS REMAIN THE SAME

HISTORY:

ALL PREVIOUS CITES BECOME 100%(of the eleven committees Delete Committee L)

79040100325

Candidate/Committee FLORIDA CITIZENS FOR A BETTER GOVERNMENTTreasurer Roberta EastinAddress Route 5, Box 14F, Leesburg, FL 32748

Report Type	Coverage Dates	Receipts	Expenditures	Cash On Hand	Debts
Year End	12/26-12/31/77	600	0	600	0
1st Quarter	1/1-3/31/78	500	50	1,050	0
Total		1,100	50	1,050	0

NOTE: ALLEGATIONS REMAIN THE SAME

HISTORY:

ALL PREVIOUS CITES BECOME 100%(of the eleven committees Delete Committee L)

79040100326

Candidate/Committee CONCERNED CITIZENS OF FLORIDA
Treasurer Maurice R. Eastin
Address Route 5, Box 147, Leesburg, FL 32748

Report Type	Coverage Dates	Receipts	Expenditures	Cash On Hand	Debts
Year End	12/26-12/31/77	600	0	600	0
1st Quarter	1/1-3/31/78	500	50	1,050	0
Total		1,100	50	1,050	0

NOTE: ALLEGATIONS REMAIN THE SAME

HISTORY:

ALL PREVIOUS CITES BECOME 100%(of the eleven committees Delete Committee L)

79040100327

Candidate/Committee

TAXPAYERS ALLIED FOR GOOD GOVERNMENT

Treasurer

Barbara Wiseman

Address

318 Bird Key Drive, Sarasota, FL 33577

Report Type	Coverage Dates	Receipts	Expenditures	Cash On Hand	Debts
Year End					
1st Quarter * 1/1-5/15/78		0	0	0	0
Total		0	0	0	0

*Termination Report

NOTE: COMMITTEE TERMINATED AS OF 5/15/78

7904010032.8

Candidate/Committee NEW YORK TAXPAYERS UNITED FOR A MORE EFFECTIVE CONGRESSTreasurer Barbara NolanAddress Guard Hill Road, Bedford, NY 10506

Report Type	Coverage Dates	Receipts	Expenditures	Cash On Hand	Debt
Year End *		350		350	
1st Quarter	1/1-3/31/78	0	50	300	0
Total			50	300	0

*Note: Committee did not file a Year End Report. Cash-On-Hand is reflected on 1st Quarter Report.

NOTE: ALLEGATIONS REMAIN THE SAME

HISTORY:

ALL PREVIOUS CITES BECOME 100%(of the eleven committees Delete Committee L)

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		PRIMARY	GENERAL	PRIMARY	GENERAL			
CONCERNED PENNSYLVANIA TAXPAYERS COMMITTEE								
CONNECTED ORGANIZATION: NONE								
	1978 STATEMENT OF ORGANIZATION					10JAN78		4 78FEC/063/3242
	REQUEST FOR ADDITIONAL INFORMATION					13JAN78		2 78FEC/063/5401
	STATEMENT OF ORGANIZATION- AMENDMENT					27JAN78		2 78FEC/064/4216
	STATEMENT OF ORGANIZATION- AMENDMENT					2FEB78		2 78FEC/065/4807
	1977 YEAR END REPORT	1,100		0		26DEC77 -31DEC77		5 78FEC/065/4804
	REQUEST FOR ADDITIONAL INFORMATION					26DEC77 -31DEC77		3 78FEC/072/3634
	YEAR END REPORT - AMENDMENT					26DEC77 -31DEC77		6 78FEC/073/4232
	1978 APRIL 10 QUARTERLY	1,000		50		1JAN78 -31MAR78		4 78FEC/070/5049
	TOTAL	2,100	0	50	0			28 TOTAL PAGES

ID# C00084614

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COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
SOUTHWEST CITIZENS FOR GOOD GOVERNMENT								
CONNECTED ORGANIZATION: NONE								
1978 STATEMENT OF ORGANIZATION								
REQUEST FOR ADDITIONAL INFORMATION								
STATEMENT OF ORGANIZATION- AMENDMENT								
STATEMENT OF ORGANIZATION- AMENDMENT								
1977 YEAR END REPORT		3,725		0		9JAN78	4	78FEC/063/1702
1978 APRIL 10 QUARTERLY		840		50		12JAN78	2	78FEC/063/3926
						23JAN78	2	78FEC/064/2281
						22FEB78	1	78FEC/067/2486
						26DEC77 -31DEC77	6	78FEC/067/2487
						1JAN78 -31MAR78	4	78FEC/071/1696
TOTAL		4,565	0	50	0		19	TOTAL PAGES

ID# C00084384

7 9 0 4 0 1 0 0 3 3 2

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COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
SOUTHWEST GOOD GOVERNMENT COMMITTEE								ID# C00084629
	CONNECTED ORGANIZATION: NONE							
	1978 STATEMENT OF ORGANIZATION- AMENDMENT					2FEB78		2 78FEC/065/4539
	STATEMENT OF ORGANIZATION					9FEB78		4 78FEC/066/5097
	1977 YEAR END REPORT	3,225		0		24DEC77 -31DEC77		5 78FEC/065/4534
	1978 APRIL 10 QUARTERLY	830		50		1JAN78 -31MAR78		4 78FEC/071/4941
	TOTAL	4,055	0	50	0			13 TOTAL PAGES

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		PRIMARY	GENERAL	PRIMARY	GENERAL			
CITIZENS FOR EFFECTIVE GOVERNMENT								ID# C00064914
	CONNECTED ORGANIZATION: NONE							
	1978 STATEMENT OF ORGANIZATION					12JAN78	4	78FEC/063/3727
	REQUEST FOR ADDITIONAL INFORMATION					13JAN78	3	78FEC/063/5542
	STATEMENT OF ORGANIZATION- AMENDMENT					7FEB78	1	78FEC/066/4098
1977	YEAR END REPORT	2,875		0		26DEC77 -31DEC77	6	78FEC/066/4099
	REQUEST FOR ADDITIONAL INFORMATION					26DEC77 -31DEC77	4	78FEC/069/3172
	YEAR END REPORT - AMENDMENT					26DEC77 -31DEC77	5	78FEC/072/3739
1978	APRIL 10 QUARTERLY	1,950		50		1JAN78 -31MAR78	4	78FEC/072/4139
	TOTAL	4,825	0	50	0		27	TOTAL PAGES

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COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
NEW JERSEY CITIZENS FOR REPRESENTATIVE GOVERNMENT								
CONNECTED ORGANIZATION: NONE								
	1978 STATEMENT OF ORGANIZATION					16JAN78		4 78FEC/063/5172
	REQUEST FOR ADDITIONAL INFORMATION					20JAN78		2 78FEC/064/1360
	STATEMENT OF ORGANIZATION- AMENDMENT					6FEB78		1 78FEC/066/4402
	1977 YEAR END REPORT	2,100		0		26DEC77 -31DEC77		5 78FEC/066/3854
	1978 APRIL 10 QUARTERLY	0		50		1JAN78 -31MAR78		3 78FEC/071/1796
	TOTAL	2,100	0	50	0			15 TOTAL PAGES

ID# C00084996

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		PRIMARY	GENERAL	PRIMARY	GENERAL			
ALLIANCE FOR BETTER GOVERNMENT.								
CONNECTED ORGANIZATION: NONE								
	1978 STATEMENT OF ORGANIZATION					16JAN78		4 78FEC/063/4774
	REQUEST FOR ADDITIONAL INFORMATION					23JAN78		3 78FEC/064/4045
	STATEMENT OF ORGANIZATION- AMENDMENT					2FEB78		1 78FEC/065/4583
1977	YEAR END REPORT - AMENDMENT							2 78FEC/069/1462
	YEAR END REPORT	1,700		0		26DEC77 -31DEC77		5 78FEC/065/4584
	REQUEST FOR ADDITIONAL INFORMATION					26DEC77 -31DEC77		3 78FEC/068/0390
	REQUEST FOR ADDITIONAL INFORMATION					26DEC77 -31DEC77		4 78FEC/069/3418
	YEAR END REPORT - AMENDMENT					26DEC77 -31DEC77		5 78FEC/072/3454
1978	APRIL 10 QUARTERLY	3,905		50		1JAN78 -31MAR78		4 78FEC/071/2413
	TOTAL	5,605	0	50	0			23 TOTAL PAGES

ID# C00085209

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		PRIMARY	GENERAL	PRIMARY	GENERAL			
UNITED TAXPAYERS FOR GOOD GOVERNMENT COMMITTEE								ID# C00085639
	CONNECTED ORGANIZATION: NONE							
	1978 STATEMENT OF ORGANIZATION					26JAN78	4	78FEC/064/3120
	STATEMENT OF ORGANIZATION- AMENDMENT					2FEB78	1	78FEC/065/4872
	1977 YEAR END REPORT	1,650		0		24DEC77 -31DEC77	4	78FEC/065/4873
	1978 APRIL 10 QUARTERLY	2,100		50		1JAN78 -31MAR78	5	78FEC/071/1237
	TOTAL	3,750	0	50	0		14	TOTAL PAGES

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		PRIMARY	GENERAL	PRIMARY	GENERAL							
TAXPAYERS FOR BETTER GOVERNMENT												
CONNECTED ORGANIZATION: NONE												
1978 STATEMENT OF ORGANIZATION												
REQUEST FOR ADDITIONAL INFORMATION												
STATEMENT OF ORGANIZATION- AMENDMENT												
1977 YEAR END REPORT												
1978 APRIL 10 QUARTERLY												
TOTAL		1,375	0	50	50	0						
							16	TOTAL PAGES				

IDS C00084459

4 78FEC/063/2485
2 78FEC/063/3941
1 78FEC/067/3432
5 78FEC/067/3433
4 78FEC/074/1674

9JAN78
13JAN78
27FEB78
26DEC77 -31DEC77
1JAN78 -31MAR78

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		PRIMARY	GENERAL	PRIMARY	GENERAL			
CONCERNED TAXPAYERS FOR BETTER GOVERNMENT								
CONNECTED ORGANIZATION: NONE								
	1978 STATEMENT OF ORGANIZATION					16JAN78	4	78FEC/063/4385
	REQUEST FOR ADDITIONAL INFORMATION					20JAN78	3	78FEC/064/1363
	STATEMENT OF ORGANIZATION- AMENDMENT					13FEB78	1	78FEC/067/0266
1977	YEAR END REPORT	1,000		0		26DEC77 -31DEC77	5	78FEC/067/0267
	REQUEST FOR ADDITIONAL INFORMATION					26DEC77 -31DEC77	3	78FEC/072/3605
	YEAR END REPORT - AMENDMENT					26DEC77 -31DEC77	5	78FEC/073/3178
1978	APRIL 10 QUARTERLY	950		50		1JAN78 -31MAR78	4	78FEC/072/0254
	TOTAL	1,950	0	50	0		25	TOTAL PAGES

ID# C00085001

7 9 0 4 0 1 0 0 3 3 9

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COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
FLORIDA CITIZENS FOR A BETTER GOVERNMENT								
CONNECTED ORGANIZATION: NONE								
	1978 STATEMENT OF ORGANIZATION					9 JAN 78	4	78FEC/063/1821
	REQUEST FOR ADDITIONAL INFORMATION					12 JAN 78	2	78FEC/063/3932
	STATEMENT OF ORGANIZATION- AMENDMENT					7 FEB 78	1	78FEC/066/4055
1977	YEAR END REPORT	600		0		26 DEC 77 - 31 DEC 77	4	78FEC/066/4056
	REQUEST FOR ADDITIONAL INFORMATION					26 DEC 77 - 31 DEC 77	2	78FEC/072/3624
	YEAR END REPORT - AMENDMENT					26 DEC 77 - 31 DEC 77	5	78FEC/073/4248
1978	APRIL 10 QUARTERLY	500		50		1 JAN 78 - 31 MAR 78	4	78FEC/071/1674
	REQUEST FOR ADDITIONAL INFORMATION					1 JAN 78 - 31 MAR 78	4	78FEC/074/3332
	TOTAL	1,100	0	50	0		26	TOTAL PAGES

ID# C00084400

7 9 0 4 0 1 0 0 3 4 0

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COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
CONCERNED CITIZENS OF FLORIDA								ID# C00084392
	CONNECTED ORGANIZATION: NONE							
	1978 STATEMENT OF ORGANIZATION					9JAN78	4	78FEC/063/1829
	REQUEST FOR ADDITIONAL INFORMATION					12JAN78	2	78FEC/063/3923
	STATEMENT OF ORGANIZATION- AMENDMENT					7FEB78	1	78FEC/066/3925
1977	YEAR END REPORT	600		0		26DEC77 -31DEC77	4	78FEC/066/3926
	REQUEST FOR ADDITIONAL INFORMATION					26DEC77 -31DEC77	3	78FEC/072/3601
	YEAR END REPORT - AMENDMENT					26DEC77 -31DEC77	6	78FEC/073/3460
1978	APRIL 10 QUARTERLY	500		50		1JAN78 -31MAR78	4	78FEC/071/2404
	REQUEST FOR ADDITIONAL INFORMATION					1JAN78 -31MAR78	4	78FEC/074/3336
	TOTAL	1,100	0	50	0		28	TOTAL PAGES

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COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
NEW YORK TAXPAYERS UNITED FOR A MORE EFFECTIVE CONGRESS								ID# C00088286
	CONNECTED ORGANIZATION: BLANK							
	1978 STATEMENT OF ORGANIZATION					27FEB78	2	78FEC/067/4120
	REQUEST FOR ADDITIONAL INFORMATION					3APR78	3	78FEC/069/3415
	STATEMENT OF ORGANIZATION- AMENDMENT					14APR78	4	78FEC/072/2278
	REQUEST FOR ADDITIONAL INFORMATION					21APR78	3	78FEC/072/5211
	APRIL 10 QUARTERLY	0		50		1JAN78 -31MAR78	3	78FEC/070/1253
	TOTAL	0	0	50	0		15	TOTAL PAGES

Attachment #11
Pages 1-11

These are all copies of envelopes that the Commission received documents in.
Pages 1 - 6, were received with Amended Year-End Reports (ALL inadequate).
Page 7, is the envelope to an Amended Statement of Organization.
Pages 8 - 10. are the envelopes to Reports of Receipts and Expenditures (ALL
APRIL 10 Quarterly Reports).
Page 11, is the envelope to a TERMINATION Report.

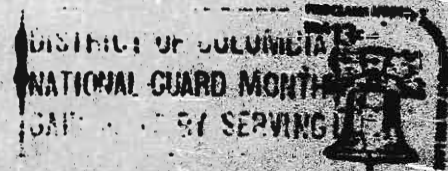
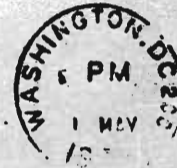
79040100343

7 9 0 4 0 1 0 0 3 4 4

Attachment #11
(Page 1)

FLORIDA CITIZENS FOR A BETTER GOVERNMENT
Response to Year-End RFAI

7 8 0 3 0 7 3 4 2 5 2



78 MAY 4 PM 12:10

RECEIVED
FEDERAL ELECTION
COMMISSION

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

7 9 0 4 0 1 0 0 3 4 5

Attachment #11
(Page 2)

CONCERNED CITIZENS OF FLORIDA
Response to Year-End Report RFAI

7 9 0 3 0 7 3 3 4 6 5



79 MAY : PM 1:33

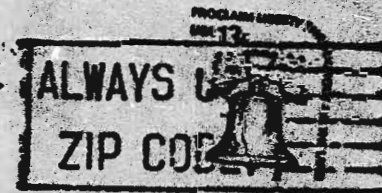
Federal Election Committee
1325 K Street, N.W.
Washington, D.C. 20463

7 9 0 4 0 1 0 0 3 4 6

Attachment #11
(Page 3)

CONCERNED PENNSYLVANIA TAXPAYERS COMMITTEE
Response to Year-End Report RFAI

7 8 0 3 0 7 3 4 2 4 7



60:21 PM 4 MAY 81

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463
RECEIVED
FEDERAL ELECTION
COMMISSION

7 9 0 4 0 1 0 0 3 4 7

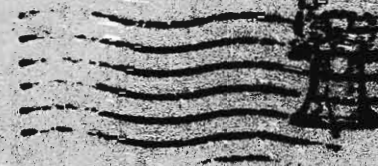
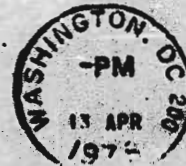
Attachment #11
(Page 4)

ALLIANCE FOR BETTER GOVERNMENT
Response to Year-End Report RFAI

8 0 3 0 7 2 3 4 5 8

FED
C

APR 17 AM 9:19



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

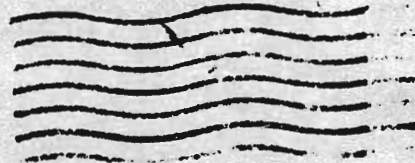
Attn: Frank Kleinman

7 9 0 4 0 1 0 0 3 4 8

Attachment #11
(Page 5)

CITIZENS FOR EFFECTIVE GOVERNMENT
Response to Year-End Report RFAI

7 8 0 3 0 7 2 3 7 4 3



'78 APR 11 PM 1:06

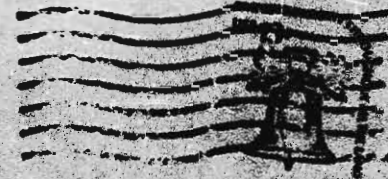
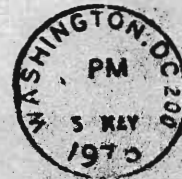
Mr. Mark Kleinman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

7 9 0 4 0 1 0 0 3 4 5

Attachment #11
(Page 6)

CONCERNED TAXPAYERS FOR BETTER GOVERNMENT
Response to Year-End RFAI

7 8 0 3 0 7 3 5 1 8 3



7c : 3
Federal Election Commission
1250 K Street, N.W.
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION

NEW YORK TAXPAYERS UNITED FOR A MORE EFFECTIVE
CONGRESS
Response to Statement of Organization RFAI



9930722279

78 APR 14 PM 12:33

FEDERAL ELECTION COMMISSION

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

Attn: Mark Kleinman

79040100350

7 9 0 4 0 1 0 0 3 5 1

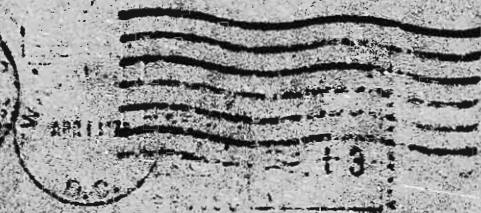
Attachment #11
(Page 8)

ALLIANCE FOR BETTER GOVERNMENT
APRIL 10 Quarterly Report

7 8 0 3 0 7 1 2 4 1 9

78 APR 12 P12:48

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



7 9 0 4 0 1 0 0 3 5 2

Attachment #11
(Page 9)

UNITED TAXPAYERS FOR GOOD GOVERNMENT COMMITTEE
APRIL 10 Quarterly Report

7024 Mac Nipp
Infayette Hill, Pa. 19444

7 8 0 3 0 7 1 1 2 4

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

61:21 Wd 11 8dV 8L

NOV 1978
FEDERAL ELECTION COMMISSION

REGISTERED
NO. 563839

7 9 0 4 0 1 0 0 3 5 3

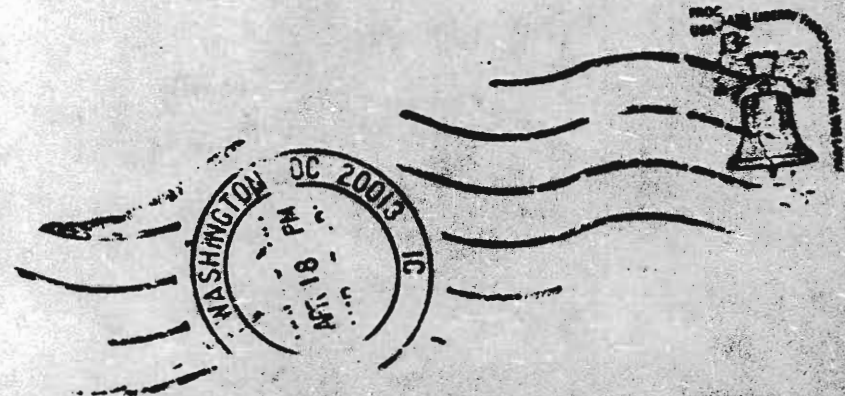
Attachment #11
(Page 10)

CITIZENS FOR EFFECTIVE GOVERNMENT
APRIL 10 Quarterly Report

7 8 0 3 0 7 2 4 1 4 3

78 APR 13 PM 12:55

FEDERAL ELECTION COMMISSION



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

7 9 0 4 0 1 0 0 3 5 1

TAXPAYERS ALLIED FOR GOOD GOVERNMENT
TERMINATION REPORT

Attachment #11
(Page 11)



Attn: Mr. Robert Snow

7

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

78 MAY 22 PM 3:38

FEDERAL ELECTION
COMMISSION

Attachment #12
Pages 1 - 13

79040100355

UNITED TAXPAYERS FOR GOOD GOVERNMENT
C00085639
Q1-Report

7 9 0 4 0 1 0 0 3 5 6

Attachment #12 (Page 1)
P.B.METER# (?) (illegible)
*Registered== in Wash., DC
" " == to ??

7024 Mac Kipp-
In Fayette Hill, Pa. 19444

7 8 0 3 0 7 1 1 2 4

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

78 APR 11 PM 12:19

FEDERAL ELECTION
COMMISSION

REGISTERED
NO. 563839

*Note the return address on envelope, yet
city from which registered P.B.Meter is
set.

7 9 0 4 0 1 0 0 3 5 7

Attachment #12 (Page 2)

UNITED TAXPAYERS FOR GOOD GOVERNMENT
C00085639

P.B.METER# 59324
Registered-- in Lafayette Hill,
PA

YE - Report

Registered-- to ??

*Barbara E. Schwartz
4024 Macriff Drive
Lafayette Hill, Pa. 19444*

7 8 0 3 0 6 5 4 9

RECEIVED
FEDERAL ELECTION
COMMISSION

'78 FEB 2 PM 3:08

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

TAXPAYERS ALLIED FOR GOOD GOVERNMENT
C00084608
FER - Report

P.B.METER# 988350
*Registered-- in Wash., DC
" " -- to ??
**



Attn: Mr. Robert Snow

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

78 MAY 22 PM 3:38

FEDERAL ELECTION
COMMISSION

*Note contradiction of city
where registered v. city from
mailing process beginning.

**Note that cmte. on Page 4 will
use same P.B.Meter for compli-
ance.

7 9 0 4 0 1 0 7 0 6 2

7 9 0 4 0 1 0 0 3 5 9

ALLIANCE FOR BETTER GOVERNMENT
C00085209
Q1 Quarterly Report

Attachment #12 (Page 4)
*P.B.METER# 988350
Registered-- in Wash., DC
" " -- to ??
**

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

78 APR 12 P12:48

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

*Note P.B.Meter for this
cate. is same as that of pre-
vious cate. on Page 3.

*Note report and city from
which it is being sent, yet
the committee is registered in
Woodmere, NY



7 9 0 4 0 1 0 0 3 6 0

Attachment #12 (Page 5)

N.J. CITIZENS FOR BETTER GOVERNMENT

C00084996

YE-Report & Statement of Organization Amendment (in same envelope)

P.B.METER# 835762

Registered--in Northvale, NJ

" " " to ??

FEDERAL ELECTION
COMMISSION

N. J.

POSTAGE

78 FEB 6 PM 5:00

Special Delivery

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

7
9
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7 9 0 4 0 1 0 0 3 6 1

CITIZENS FOR EFFECTIVE GOVERNMENT
C00084814
Statement of Organization (New)

Attachment #12 (Page 6)

P.B.METER# 1332005
Registered-- in Allentown, PA
" " " to ??

7 8 0 3 0 6 3 3 7 3 0



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

78 JAN 10 PM 10:23

RECEIVED
FEDERAL ELECTION
COMMISSION

7 9 0 4 0 1 0 0 3 6 2

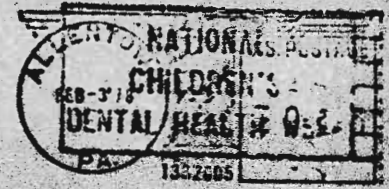
CITIZENS FOR EFFECTIVE GOVERNMENT
C00084814
YE-Report

Attachment #12 (Page 7)

P.B.METER# 1332005
Registered in Allentown, PA
" " " to ??

7 8 0 3 0 6 6 4 1 0 1 8
RECEIVED

FEB 7 PM 12



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

7 9 0 4 0 1 0 0 3 6 3

SOUTHWEST CITIZENS FOR GOOD GOVERNMENT
C00084384
Statement of Organization - Amendment

Attachment #12 (Page 8)
*P.B.METER# 1208843
Registered== in San Diego, CA
" " "== to ??

** BALBOA INTERNAL MEDICINE
MEDICAL GROUP, INC.
306 WALNUT AVENUE, SUITE 28
SAN DIEGO, CALIFORNIA 92103

RECEIVED
FEDERAL ELECTION
COMMISSION

'78 JAN 23 AM 11:01



Federal Election Commission
1325 K St., N.W.
Washington, D.C. 20463

**Note previously processed envelope
for registered corporation in CA.

*Note the following page
with envelope return address
similar & same P.B.Meter #.

7 9 0 4 0 1 0 0 3 6 4

Attachment #12 (Page 9)

SOUTHWEST CITIZENS FOR GOOD GOVERNMENT
C00084384
Statement of Organization - New

*P.B.METER# 1208843
Registered in San Diego, CA
" " " to ??

**ARNOLD S. ROLAND, M.D.
Treasurer
Southwest Citizens for Good Government PAC
206 Walnut Ave., Suite 38
San Diego, California 92103



7 8 0 7
FEDERAL ELECTION
COMMISSION

'78 JAN 9 PM 1:22

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

**Treasurer of the committee not
printing previous address on regi-
stration PAGE 2 of FEC FORM 1.

*Same Meter# as previous
page, with very similar
return address!!

7 9 0 4 0 1 0 0 3 6 5

TAXPAYERS FOR BETTER GOVERNMENT
C00084459
Q1 - Quarterly Report

Attachment #12 (Page 10)

P.B.METER# 1208296
Registered in Melville, NY
" " " to ??

7 8 0 3 0 7 4 1 6 7 7



'78 MAY 15 PM 2:28

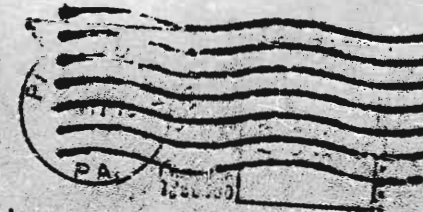
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

7 9 0 4 0 1 0 0 3 6 6

Attachment #12 (Page 11)

CONCERNED TAXPAYERS FOR BETTER GOVERNMENT
C00085001
Statement of Organization - New

P.B.METER# 1330380
Registered in Pittsburgh, PA
" " " to ??



78 JAN 13 PM 3:15

RECEIVED
FEDERAL ELECTION
COMMISSION

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

7 8 0 3 0 6 3 4 3 8 8

7 9 0 4 0 1 0 0 3 6 7

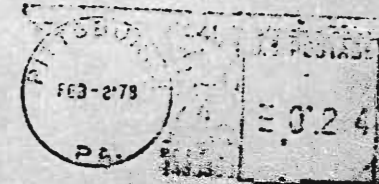
CONCERNED TAXPAYERS FOR BETTER GOVERNMENT
C00085001
YE - Report

Attachment #12 (Page 12)
P.B.METER# 1330380
Registered in Pittsburgh, PA
" " " to ??

Concerned Taxpayers
978 Center Oak Dr.
Pittsburgh, PA 15237

RECEIVED
FEDERAL ELECTION
COMMISSION

'78 FEB 13 PM 12:22



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

7 8 0 3 0 6 7 0 2 7 1

7 9 0 4 0 1 0 0 3 6 8

CONCERNED TAXPAYERS FOR BETTER GOVERNMENT
C00085001
Q1-Quarterly Report

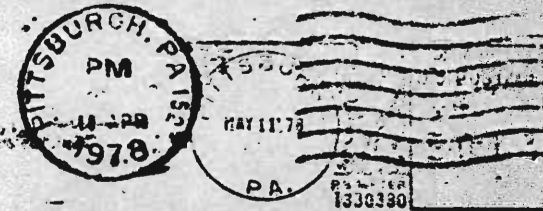
Attachment #12 (Page 13)

P.B.METER#1330380
Registered in Pittsburgh, PA
" " " to ??

7 8 0 3 0 7 2 0 2 5 7

78 APR 14 PM 12:57
RECEIVED
FEDERAL ELECTION
COMMISSION

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



Attachment #13

Note the same address for:

Page 1; Incorporated Medical group in Ca.,

Page 2; Return address typed for treasurer of Southwest Citizens
for Good Government,

Page 3; Itemized Principal Place of Business Address for contributor
Dr. Channick, and Dr. roland (yet treas. of a dif-
ferent committee) on Q1-Quarterly report,

Page 4, Itemized Principal Place of Business for the same two contribu-
& 5; tors as above on Year-End Report '77.

79040100369

7 9 0 4 0 1 0 0 3 7 0

Attachment #13
(Page 1)

BALBOA INTERNAL MEDICINE
MEDICAL GROUP, INC.
505 BALBOA AVENUE, SUITE 50
SAN DIEGO, CALIFORNIA 92103

RECEIVED
FEDERAL ELECTION
COMMISSION

78 JAN 23 AM 11:01



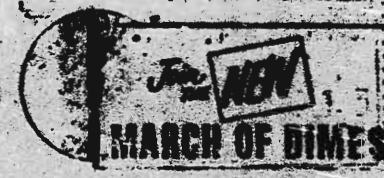
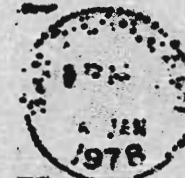
Federal Election Commission
1325 K St., N.W.
Washington, D.C. 20463

7 8 0 3 0 6 4 2 0

7 9 0 4 0 1 0 0 3 7 1

Attachment #13
(Page 2)

ARNOLD S. ROLAND, M.D.
Treasurer
Southwest Citizens for Good Government PAC
San Diego, California 92103



7 8 0 3 0 1 6 7
FEDERAL ELECTION
COMMISSION

'78 JAN 9 PM 1:22

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

Section Commission
Street, N.W.
ington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
Other Income, Loans, Refunds)

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

Attachment #13 (Page 2)

Page 1 of 3 for
Line Number 14

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

Alliance for Better Government

Full Name, Mailing Address and ZIP Code

J. Michael Channick
4363 N. Talmadge Dr.
San Diego, Ca. 92116

Principal Place of Business

Occupation

Doctor

Date (month,
day, year)

2/20/78

Amount of each Receipt
this Period

\$500

Receipt for:

☐ Primary ☐ General ☒ Other

☒ Check if Contributor is self-employed

Aggregate Year-To-Date . . . \$ 750

Full Name, Mailing Address and ZIP Code

Barry Strauch
823 Turkey Run Road
McLean, Va. 22101

Principal Place of Business

8316 Arlington Blvd.
Fairfax, Va. 22030

Occupation

Doctor

Date (month,
day, year)

2/25/78

Amount of each Receipt
this Period

\$250

Receipt for:

☐ Primary ☐ General ☒ Other

☒ Check if Contributor is self-employed

Aggregate Year-To-Date . . . \$ 250

Full Name, Mailing Address and ZIP Code

Arnold Roland
7350 Caminito Carlotta
San Diego, Ca. 92121

Principal Place of Business

305 Walnut
San Diego, Ca. 92103

Occupation

Doctor

Date (month,
day, year)

2/22/78

Amount of each Receipt
this Period

\$250

Receipt for:

☐ Primary ☐ General ☒ Other

☒ Check if Contributor is self-employed

Aggregate Year-To-Date . . . \$ 500

Full Name, Mailing Address and ZIP Code

Christy S. Herbert
1816 Rice Blvd.
Houston, Texas 77005

Principal Place of Business

4407 Yoakum Blvd.
Houston, Texas 77006

Occupation

Doctor

Date (month,
day, year)

1/31/78

Amount of each Receipt
this Period

\$330

Receipt for:

☐ Primary ☐ General ☒ Other

☒ Check if Contributor is self-employed

Aggregate Year-To-Date . . . \$ 330

Full Name, Mailing Address and ZIP Code

James H. Kneppshield
10809 Alloway Dr.
Potomac, Md. 20854

Principal Place of Business

4905 Del Ray Ave.
Bethesda, Md. 20014

Occupation

Doctor

Date (month,
day, year)

2/9/78

Amount of each Receipt
this Period

\$250

Receipt for:

☐ Primary ☐ General ☒ Other

☒ Check if Contributor is self-employed

Aggregate Year-To-Date . . . \$ 250

Full Name, Mailing Address and ZIP Code

Henry R. Meyer
663 E. Palo Verde
Yuma, Ariz.

Principal Place of Business

2503 Avenue A, Suite 2
Yuma, Ariz. 85364

Occupation

Date (month,
day, year)

2/25/78

Amount of each Receipt
this Period

\$600

Receipt for:

☐ Primary ☐ General ☒ Other

☒ Check if Contributor is self-employed

Aggregate Year-To-Date . . . \$ 600

Full Name, Mailing Address and ZIP Code

Robert H. Porter
6200 W. Bellfort
Houston, Texas 77035

Principal Place of Business

Occupation

Date (month,
day, year)

2/24/78

Amount of each Receipt
this Period

\$ 50

Receipt for:

☐ Primary ☐ General ☒ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date . . . \$50

SUBTOTAL of receipts this page (optional)

\$ 2,230

TOTAL this period (last page this line number only)

\$

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(see instructions on back)

Commission
N.W.
J.C. 20463

LINE NUMBER 15

(Use separate schedules) for each numbered line)

Name of Candidate or Committee in full

Alliance For Better Government

Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Ernestine M. Lowrie 57 Juniper Weston, Mass. 02193		12-29-77	\$ 50.00
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 50.00		
Full Name, mailing address and ZIP code Sidney G. Marcum 3504 Hanover Rd. Louisville, Kentucky		12-30-77	\$500.00
Principal place of business	Occupation Doctor <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 500.00		
Full Name, mailing address and ZIP code Edmund G. Lowrie 57 Juniper Weston, Mass. 02193		12-29-77	\$ 50.00
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 50.00		
Full Name, mailing address and ZIP code J. Michael Channick 4363 N. Talmadge San Diego, California 92116		12-29-77	\$250.00
Principal place of business	Occupation Doctor <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 250.00		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Subtotal of receipts this page (optional)		▶	\$ 850.00
Total this period (last page this line number only)		▶	\$ 1,700.00

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(See instructions on back)

Attachment #13

Page 1 of 2 for (Page 5)

LINE NUMBER 15

(Use separate schedule(s) for each numbered line)

Commission
N.W.
C. 20463

Name of Candidate or Committee in full

Alliance For Better Government

Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Helen H. Gray 664 Ridgefield Ave. Pittsburgh, Pa. 15219		12-26-77	\$100.00
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 100.00		
Arnold S. Roland 7350 Caminito Carlotta San Diego, Ca. 92121		12-23-77	\$250.00
Principal place of business	306 Walnut, Suite 30 San Diego, Ca. 92109 Occupation Doctor <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 250.00		
Jessica Penson-Heyder 1519 Bolling Ave. Norfolk, Va. 23508		12-30-77	\$ 50.00
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 50.00		
Dietrich W. Heyder 1519 Bolling Ave. Norfolk, Va. 23508		12-30-77	\$200.00
Principal place of business	100 Kingsley Lane Norfook, Va. 23508 Occupation Doctor <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 200.00		
Mrs. F. Abdou 4001 N. Witchduck Rd. Virginia Beach, Va. 23455		12-30-77	\$ 50.00
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 50.00		
Fathy Abdou 4001 N. Witchduck Rd. Virginia Beach 23455		12-30-77	\$200.00
Principal place of business	100 Kingsley Lane Norfook, Va. 23455 Occupation Doctor <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 200.00		
Subtotal of receipts this page (optional)			\$ 850.00
Total this period (last page this line number only)			\$

Attachment #14
Pages 1 & 2

Copies of Telecon with Concerned Citizens of Florida, in reference to Q1-WFAT.

Page 1, 5/26/78 - with Mark Kleinman.

Page 2, 6/7/78 - with Roberto Garcia.

79040100375

TELECON FOR THE FILE

Concerned Citizens of Florida
(full name of committee)CC0084392
(identification number)Mark Kleinman

(name of analyst)

Loren Smith (302)239-7056
(committee contact)DATE/TIME: 5/26 3:00IN REFERENCE TO: RFAI-Q1

REMARKS:

Mr. Smith, a lawyer with Baskin + Sears, working in Delaware called about RFAI.

He stated that the \$50 represented attorney's fees and are not transfers between committees. He stated he would respond to RFAI accordingly.

79040100376

Concerned Citizens of Florida

(full name of committee)

000054392

(identification number)

Roberto Garcia

(name of analyst)

horen Smith (302) 239-7056

(committee contact)

DATE/TIME: 12:32 6/7IN REFERENCE TO: RFAI - Q1

REMARKS:

Mr. Smith told me that the amendment report was not in yet because 'they' were preparing other amendments as well, & would hopefully have them in, in a week or so.

He also said, "We mis-reported this \$50 expenditure, and we are going to delete it; it was simply a legal expense and should not have been itemized; it was not a transfer between affiliated committees."

103300

RECEIVED
FEDERAL ELECTION
COMMISSION

RECEIVED

JCC 3750

BASKIN & SEARS

ATTORNEYS AND COUNSELLORS AT LAW

818 CONNECTICUT AVENUE, N.W.

WASHINGTON, D. C. 20006

(202) 331-1174

CABLE BASKIN WASH. D. C.

June 6, 1978

PHILIP BASKIN*

PHILIP J. HARRIS**

DONALD L. HERSKOVITZ

LESTER A. KATZ

JOHN P. SEARS

JOHN S. WARD

*ADMITTED IN PA. ONLY

**ADMITTED IN VA. ONLY

OFFICES IN

BOCA RATON, FLA.

(305) 361-7771

CLEARWATER, FLA.

(813) 461-0000

FALLS BEACH, FLA.

(904) 461-0000

FREDERICKS, MD.

(301) 461-0000

HARRISBURG, PA.

(717) 331-1174

PITTSBURGH, PA.

(412) 331-1174

ALEXANDRIA, VA.

(703) 578-9000

Christopher Tow, Esquire
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. Tow:

Pursuant to our telephone discussion on Thursday, June 1, we have consulted with our clients over MUR 490(78). There was some strong reluctance on their part to amend their various Registration Statements, as they do not believe themselves to have been affiliated with any other political committees at any time. There was also some concern that such amendments might indicate that they were guilty of some sort of wrong, by not including affiliation in the first filing, even though they were and are convinced that their initial filing was correct.

As counsel, however, we have advised them that this area of the law and rules are somewhat complex and tricky. And we have explained that it is not a matter of guilt or innocence, but merely a technical matter of providing the Commission and the public with the greatest amount of disclosure possible. Thus, we have advised them to amend the various Registration Statements to read as if the committees were in fact affiliated. Our clients have agreed to this in the interests of wrapping up MUR 490(78) and providing the Commission with the fullest possible information. We have further informed our clients that their amendments in no way indicate any wrong on their part in filing their initial Registration Statements, which were done in good faith.

This letter is written to clearly allay any concerns of ours or our clients in the filing of our Registration Amendments. As we discussed in our first meeting, I think our mutual concern is

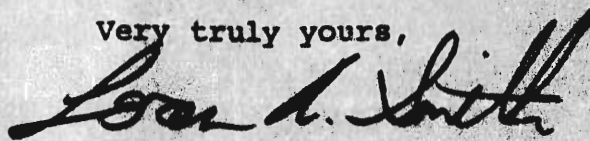
79040100378

BASKIN & SEARS

Christopher Tow, Esquire
June 6, 1978
Page Two

to make sure that the thing is done correctly. I hope these amendments will accomplish this. If my understanding is correct I would appreciate your letter confirming it. Thank you for your help and cooperation.

Very truly yours,



Loren A. Smith

LAS:jf

79040100379

BASKIN & SEARS

ATTORNEYS AND COUNSELLORS AT LAW

818 CONNECTICUT AVENUE, N. W.

WASHINGTON, D. C. 20006

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

18 JUN 7 A10:46

RECEIVED

Christopher Tow, Esquire
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Big Hand



FEDERAL ELECTION COMMISSION

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

June 2, 1978

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS *mue*

SUBJECT: MUR 490 - Interim Report dated 5-30-78
Signed: 5-31-78
Received in Office of Commission
Secretary: 6-1-78, 11:54

The above-mentioned document was circulated on a 24
hour no-objection basis at 3:00 p.m., June 1, 1978.

There were no objections to the Interim Report.

79040100381

June 1, 1978

MEMORANDUM TO: Major General
FROM: William T. West
SUBJECT: HMR 490

Please have the attached Interim Report on HMR 490
distributed to the Commission.

Thank you.

7.9040100382

BEFORE THE FEDERAL ELECTION COMMISSION
May 30, 1978

In the Matter of)

Concerned Pennsylvania Taxpayers)
Committee)

Southwest Citizens for Good)
Government)

Southwest Good Government Committee)
Citizens for Effective Government)

New Jersey Citizens for Representative)
Government)

MUR 490

Alliance for Better Government)

United Taxpayers for Good Government)

Taxpayers for Better Government)

Concerned Taxpayers for Better)
Government)

Florida Citizens for a Better)
Government)

Concerned Citizens of Florida)

Taxpayers Allied for Good Government)

New York Taxpayers United for a More)
Effective Congress)

Interim Report

The Commission found reason to believe on May 3, 1978, that the above-named committees are in violation of 2 U.S.C. §433(b)(2) for their failure to disclose affiliated and/or connected organizations. The appropriate letters were mailed to the respondent committees.

On May 11, 1978 Mr. Loren Smith contacted the Commission about MUR 490. Smith, an attorney, is a consultant in election law for the firm of Baskin and Sears. After a number of conversations, Smith stated that he was representing nine of the thirteen committees which had received reason to believe notifications from the Commission. He added that he may be representing "all others in MUR 490" also. Pursuant to a

79040100383

telephone conversation on May 24, 1978, Smith stated that he will be sending a written response to the Commission's reason to believe notification letter before the end of the week. We are awaiting this response.

The Reports Analysis Division is presently reviewing the April 10, 1978 quarterly reports of the respondent committees and is making comparisons of committee contributors and compiling other similarities. Their determinations should be ready shortly.

5/31/78

Date

William C. Oldaker

William C. Oldaker
General Counsel

79040100384

Dec 3665

BASKIN & SEARS

ATTORNEYS AND COUNSELLORS AT LAW

818 CONNECTICUT AVENUE, N.W.

WASHINGTON, D.C. 20006

(202) 831-1174

CABLE BASKIN WASH. D.C.

May 25, 1978

PHILIP BASKIN*

PHILIP J. HARRIS**

DONALD L. HERSEOVITZ

LESTER A. KATZ

JOHN P. SEARS

JOHN S. WARD

*ADMITTED IN PA. ONLY

**ADMITTED IN VA. ONLY

RECEIVED
FEDERAL ELECTION
COMMISSION

'78 MAY 27

DOCA BAYON, FLA.
(800) 251-7571
CLEARWATER, FLA.
(800) 251-7571
HARRISBURG, PA.
(717) 531-3221
PITTSBURGH, PA.
(412) 831-1174
ALEXANDRIA, VA.
(703) 278-1700

Christopher Tow, Esquire
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

803094

Dear Mr. Tow:

Pursuant to our meetings on Thursday, May 11 and Thursday, May 18, I am writing this letter in order to expedite the proceedings in MUR 490 (78). As noted previously, I represent the attached list of political committees for the firm. I believe that most, if not all, of these committees are included in MUR 490 (78). If there are any other committees involved in MUR 490 (78) I would hope you would so inform me of that fact (not by names). I feel this would not violate the Act's confidentiality provisions.

As to the essence of the matter being investigated, the Commission is inquiring into whether any of the listed PACs are affiliated within the meaning of §100.14(c) of the Regs. If this is not a correct statement of the inquiry, please let me know. Based on my understanding of §100.14(c), with the exception of the two PACs in Florida, none of the committees have any indicia of affiliation. This is why they do not list any affiliation with either each other or any of the group. As noted orally, they would each probably be very surprised if we, as their counsel, informed them that they were affiliated with another group. The commonality which I presume led to this inquiry is rooted in the fact that we, as their counsel, used common forms and procedures to file and report for these committees.

We are most anxious to expedite this matter and get it off our desks as the total money raised for all purposes by any of these committees does not justify a very extensive legal fee. If having a common legal counsel does cause a committee to be affiliated with another committee, please let us know so that we may amend our clients' filings. If you need any further material

79040100385

BASKIN & SEARS

Christopher Tow, Esquire
May 25, 1978
Page Two

or information from us, please let us know. All we are asking is that we find out as soon as possible whether there are any indicia of affiliation within the meaning of §100.14(c) involved in this case, and if there are, what is the correct response or amendment.

Thank you very much for your prompt attention.

Very truly yours,

Loren A. Smith

Loren A. Smith

LAS:jf

Enclosure

79040100386

Christopher Tow, Esquire
May 24, 1978
Page Three

COMMITTEES

Treasurers

Concerned Citizens of Florida
Route 5, Box 147
Leesburg, Florida 32748

Maurice R. Eastin

Taxpayers for Better Government
35 Wilmington Drive
Dix Hills, New York 11746

Jerome Levien

Southwest Good Government
13150 S.W. 71st Ave.
Miami, Florida

Joel Mann

United Taxpayers for
Good Government
4024 MacNiff
Lafayette Hill, Penn. 19444

Barbara Schwartz

Concerned Taxpayers for
Better Government
978 Center Oak Drive
Pittsburgh, Pennsylvania 15237

James Nicotero

Florida Citizens for a
Better Government
Route 5, Box 147
Leesburg, Florida 32748

Roberta Eastin

N.Y. Taxpayers United for a
More Effective Congress
Guard Hill Road
Bedford, N. Y. 10506

Barbara Nolan

Citizens for Effective
Government
1394 North 39th Street
Allentown, Pennsylvania 18104

David Prager

Southwest Citizens for Good
Government
7350 Caminito Carlotta
San Diego, California 92121

Arnold Roland

70040100387

Christopher Tow, Esquire
May 24, 1978
Page Four

Treasurers

Concerned Pennsylvania Taxpayers
664 Ridgefield Avenue
Pittsburgh, Pennsylvania 15216

Helen Gray

N.J. Citizens for Representative
Government
Marie Major Drive
Alpine, New Jersey 07620

Carole Lippert

Alliance for Better Government
381 Woodmere Boulevard
Woodmere, N. Y.

Marcia Cohen

79040100388

. BASKIN & SEARS

ATTORNEYS AND COUNSELLORS AT LAW

1118 CONNECTICUT AVENUE, N.W.

WASHINGTON, D.C. 20006

Christopher Tow, Esquire
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

78 MAY 27 AM 12:23

Tow MUR-490

PS Form 3811, Apr. 1977

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

1. The following service is requested (check one).

- ☐ Show to whom and date delivered. \$
☒ Show to whom, date, and address of delivery. \$
☐ RESTRICTED DELIVERY
Show to whom and date delivered. \$
☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery. \$
(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

Barbara Nolen, Treasurer
Guard Hill Road
Bedford, N.Y. 10506

3. ARTICLE DESCRIPTION:

REGISTERED NO. CERTIFIED NO. INSURED NO.

438045

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S
INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆ GPO : 1977-O-234-337

MAY 1978

FEDERAL ELECTION COMMISSION

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

POSTAGE AND FEES PAID



Ms. Barbara Nolen, Treasurer
New York Taxpayers United for a
More Effective Congress
Guard Hill Road
Bedford, New York 10506

CERTIFIED

438045

5/10

5/16

5/27

CERT Notice

5-10-78

Attempted Del - no response

unclaimed

04000239





FEDERAL ELECTION COMMISSION

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

May 5, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Helen Gray, Treasurer
Concerned Pennsylvania Taxpayers Committee
664 Ridgely Avenue
Pittsburg, Pennsylvania 15216

Re: MUR 490 (78)

Dear Ms. Gray:


Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that you, as treasurer of your committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that you may be in violation of 2 U.S.C. §433(b)(2) for failing to disclose the committee's affiliation with other organizations. We have numbered this matter MUR 490 (78).

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Christopher Tow, the attorney assigned to this matter at (202) 523-4073.

If you intend to be represented by counsel in this matter, please have such counsel notify us in writing.

Sincerely,


William C. Oldaker
General Counsel

7-201 **44-670**

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

1. The following service is requested (check one):

☐ Show to whom and date delivered.....

☒ Show to whom, date, and address of delivery.....

☐ **RESTRICTED DELIVERY**
Show to whom and date delivered.....

☐ **RESTRICTED DELIVERY**
Show to whom, date, and address of delivery.....

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Helen Gray, Treasurer
664 Ridgely Ave.
Pittsburg, Pa. 15316

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	458028	

(Always obtain signatures of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

Chub...

4. DATE OF DELIVERY
5-10-48

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

7. POSTMARK:
8267
II
AED

8. RETURN TO:

9. RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

10. POSTAGE:



FEDERAL ELECTION COMMISSION

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

May 5, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Arnold Roland, Treasurer
Southwest Citizens for Good
Government
7350 Caminito Carlotta
San Diego, California 92121

Re: MUR 490 (78)

Dear Mr. Roland:


Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that you, as treasurer of your committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that you may be in violation of 2 U.S.C. §433(b)(2) for failing to disclose the committee's affiliation with other organizations. We have numbered this matter MUR 490 (78).

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.


The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Christopher Tow, the attorney assigned to this matter at (202) 523-4073.

If you intend to be represented by counsel in this matter, please have such counsel notify us in writing.

Sincerely,

 William C. Alderson

William C. Oldaker
General Counsel

To: MUR-490		
1. SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.		
1. The following service is requested (check one): <input type="checkbox"/> Show to whom and date delivered <input checked="" type="checkbox"/> Show to whom, date, and address of delivery RESTRICTED DELIVERY Show to whom and date delivered <input type="checkbox"/> RESTRICTED DELIVERY Show to whom, date, and address of delivery (CONSULT POSTMASTER FOR FEES)		
2. ARTICLE ADDRESSED TO: Arnold Roland, Treasurer 7350 Caminito Carlotta San Diego, Calif. 92121		
3. ARTICLE DESCRIPTION: REGISTERED NO. _____ CERTIFIED NO. <u>438025</u> INSURED NO. _____ (Always obtain signature of addressee or agent)		
I have received the article described above. SIGNATURE <input checked="" type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent <u>Arnold Roland</u>		
4. DATE OF DELIVERY <div style="text-align: center;">  </div>		
5. ADDRESS (Complete only if requested) 		
6. UNABLE TO DELIVER BECAUSE: 		CLERK'S INITIALS



FEDERAL ELECTION COMMISSION

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

May 5, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Joel Mann, Treasurer
Southwest Good Government
Committee
13150 S.W. 71st Avenue
Miami, Florida

Re: MUR 490 (78)

Dear Mr. Mann:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that you, as treasurer of your committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that you may be in violation of 2 U.S.C. §433(b)(2) for failing to disclose the committee's affiliation with other organizations. We have numbered this matter MUR 490 (78).

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Christopher Tow, the attorney assigned to this matter at (202) 523-4073.

If you intend to be represented by counsel in this matter, please have such counsel notify us in writing.

W. J. Baker

William C. Oldaker
General Counsel

TO: Mr. Mann

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

1. The following service is requested (check one).

☐ Show to whom and date delivered.....

☒ Show to whom, date, and address of delivery.....

☐ **RESTRICTED DELIVERY**
Show to whom and date delivered.....

☐ **RESTRICTED DELIVERY.**
Show to whom, date, and address of delivery.....

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Joel Mann, Treasurer
13150 S.W. 71st Ave.
Miami, Fla.

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438043	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ **Addressee** ☐ **Authorized agent**

Joel Mann

DATE OF DELIVERY
5-12-78

4. ADDRESS (Complete only if reduced)
13150 S.W. 71st Ave.
Miami, Fla. 33134

5. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

U.S. MAIL



FEDERAL ELECTION COMMISSION

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

May 5, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. David Prager, Treasurer
Citizens for Effective Government
1394 N. 39th Street
Allentown, Pennsylvania 18104

Re: MUR 490 (78)

Dear Mr. Prager:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that you, as treasurer of your committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that you may be in violation of 2 U.S.C. §433(b)(2) for failing to disclose the committee's affiliation with other organizations. We have numbered this matter MUR 490 (78).

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Christopher Tow, the attorney assigned to this matter at (202) 523-4073.

If you intend to be represented by counsel in this matter, please have such counsel notify us in writing.

Wm. J. Baker

William C. Oldaker
General Counsel

PS Form 3811, Jan. 1977

440-400

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

1. The following service is requested (check one).

☐ Show to whom and date delivered.....

☒ Show to whom, date, and address of delivery.....

☐ **RESTRICTED DELIVERY**
Show to whom and date delivered.....

☐ **RESTRICTED DELIVERY**
Show to whom, date, and address of delivery.....

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
David Prager
1394 N. 39th St.
Allentown, Pa. 18104

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438041	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

Elmer Douglas

DATE OF DELIVERY 5/11/78	POSTMARK VALLEY Forge PA MAY 12 1978
------------------------------------	--

5. ADDRESS (Complete only if registered)

1394 N. 39th St.
Allentown PA

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

USPO

7-570-107-0-254-257



FEDERAL ELECTION COMMISSION

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

May 5, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Carole Lippert, Treasurer
New Jersey Citizens for Representative
Government
Marie Major Drive
Alpine, New Jersey 07620

Re: MUR 490 (78)

Dear Ms. Lippert:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that you, as treasurer of your committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that you may be in violation of 2 U.S.C. §433(b)(2) for failing to disclose the committee's affiliation with other organizations. We have numbered this matter MUR 490 (78).

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Christopher Tow, the attorney assigned to this matter at (202) 523-4073.



FEDERAL ELECTION COMMISSION

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

May 5, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Marcia Cohen, Treasurer
Alliance for Better Government
381 Woodmere Blvd.
Woodmere, New York

Re: MUR 490 (78)

Dear Ms. Cohen:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that you, as treasurer of your committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that you may be in violation of 2 U.S.C. §433(b)(2) for failing to disclose the committee's affiliation with other organizations. We have numbered this matter MUR 490 (78).

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

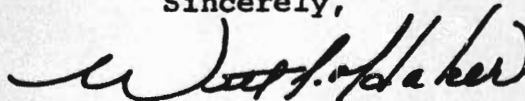
The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Christopher Tow, the attorney assigned to this matter at (202) 523-4073.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel notify us in writing.

Sincerely,



William C. Oldaker
General Counsel

Form 3811, Rev. 1972

7-491

1. The following service is requested (check one):

☐ Show to whom and date delivered.

☒ Show to whom, date, and address of delivery.

☐ RESTRICTED DELIVERY

Show to whom and date delivered.

☐ RESTRICTED DELIVERY.

Show to whom, date, and address of delivery.

(CONSULT POSTMASTER FOR FEES)

ARTICLE ADDRESSED TO:

Maria Cohen, Treasurer

381 Woodmere Blvd.

Woodmere, N.Y.

2. ARTICLE DESCRIPTION:

REGISTERED NO. CERTIFIED NO. INSURED NO.

431039

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☒ Addressee ☐ Authorized agent

DATE OF DELIVERY

5-12-78

3. ADDRESS (Complete only if requested)

4. UNABLE TO DELIVER BECAUSE:

CLERK'S RESPONSE

MAY 12 1978

★ 69 : 107 - 0-234-237



FEDERAL ELECTION COMMISSION

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

May 5, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Barbara Schwartz, Treasurer
United Taxpayers for Good
Government Committee
4024 MacNiff
Lafayette Hill, Pennsylvania 19444

Re: MUR 490 (78)

Dear Ms. Schwartz:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that you, as treasurer of your committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that you may be in violation of 2 U.S.C. §433(b)(2) for failing to disclose the committee's affiliation with other organizations. We have numbered this matter MUR 490 (78).

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The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Christopher Tow, the attorney assigned to this matter at (202) 523-4073.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel notify us in writing.

Sincerely,



William C. Oldaker
General Counsel

7904010040

Form 3811, Apr. 1977

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

2. The following service is requested (check one).

☐ Show to whom and date delivered.

☒ Show to whom, date, and address of delivery.

☐ RESTRICTED DELIVERY
Show to whom and date delivered.

☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery. \$ ____
(CONSULT POSTMASTER FOR FEES)

3. ARTICLE ADDRESSED TO:
Barbara Schwartz
4024 Mac Nitt
Lafayette Hill, Pa. 19444

4. ARTICLE DESCRIPTION:

REGISTERED NO. _____ CERTIFIED NO. 438038 INSURED NO. _____

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

Barbara C. Schwartz

DATE OF DELIVERY 5-11-78

5. ADDRESS (Complete, when requested):
4024 Mac Nitt Dr
Lafayette Hill Pa 19444

6. UNABLE TO DELIVER BECAUSE:

POSTMARK
MAY 11 1978
0530

COUNTY'S INDEMNITY

☆ GPO : 1977-O-234-337



FEDERAL ELECTION COMMISSION

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

May 5, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Jerome Levien, Treasurer
Taxpayers for Better Government
35 Wilmington Drive
Dix Hills, New York 11746

Re: MUR 490 (78)

Dear Mr. Levien:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that you, as treasurer of your committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that you may be in violation of 2 U.S.C. §433(b)(2) for failing to disclose the committee's affiliation with other organizations. We have numbered this matter MUR 490 (78).

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Christopher Tow, the attorney assigned to this matter at (202) 523-4073.

If you intend to be represented by counsel in this matter, please have such counsel notify us in writing.

Sincerely,
Wm. F. Oaker

William C. Oldaker
General Counsel

<p>2-1 410</p> <p>GENERAL (Use forms 1, 2, and 3) First address in the "RETURN TO" space on label</p>							
<p>1. The following service is requested (check one).</p> <p><input type="checkbox"/> Show to whom and date delivered.....</p> <p><input checked="" type="checkbox"/> Show to whom, date, and address of delivery.....</p> <p><input type="checkbox"/> RESTRICTED DELIVERY Show to whom and date delivered.....</p> <p><input type="checkbox"/> RESTRICTED DELIVERY. Show to whom, date, and address of delivery. \$_____</p> <p>(CONSULT POSTMASTER FOR FEES)</p>							
<p>2. ARTICLE ADDRESSED TO: Jerome Leven, Treasurer 35 Wilmington Drive Dix Hills, N.Y. 11746</p>							
<p>3. ARTICLE DESCRIPTION:</p> <table border="1"> <tr> <td>REGISTERED NO.</td> <td>CERTIFIED NO.</td> <td>INSURED NO.</td> </tr> <tr> <td></td> <td>439037</td> <td></td> </tr> </table> <p><i>(Always attach duplicate of address on agent)</i></p>		REGISTERED NO.	CERTIFIED NO.	INSURED NO.		439037	
REGISTERED NO.	CERTIFIED NO.	INSURED NO.					
	439037						
<p>I have received the article described above. <input type="checkbox"/> Addressee <input checked="" type="checkbox"/> Authorizing agent</p> <p>Barry Leven</p>							
<p>4. DATE OF DELIVERY: 5/10/68</p>	<p>5. ADDRESS (Do not include P.O. number) 35 Wilmington Dr Dix Hills, N.Y.</p>						
<p>6. UNABLE TO DELIVER BECAUSE:</p>	<p>CLERK'S INITIALS</p>						



FEDERAL ELECTION COMMISSION

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

May 5, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James Nicotero, Treasurer
Concerned Taxpayers for Better
Government
978 Center Oak Drive
Pittsburg, Pennsylvania 15237

Re: MUR 490 (78)

Dear Mr. Nicotero:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that you, as treasurer of your committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that you may be in violation of 2 U.S.C. §433(b)(2) for failing to disclose the committee's affiliation with other organizations. We have numbered this matter MUR 490 (78).

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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If you have any questions, please contact Christopher Tow, the attorney assigned to this matter at (202) 523-4073.

If you intend to be represented by counsel in this matter, please have such counsel notify us in writing.

Sincerely,
Wm. J. Baker

William C. Oldaker
General Counsel

To MUR-40

★ SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space at bottom.

1. The following service is requested (check one).

<input type="checkbox"/>	Show to whom and date delivered.....	f
<input type="checkbox"/>	Show to whom, date, and address of delivery.....	f
<input checked="" type="checkbox"/>	RESTRICTED DELIVERY	
<input type="checkbox"/>	Show to whom and date delivered.....	f
<input checked="" type="checkbox"/>	RESTRICTED DELIVERY.	
<input type="checkbox"/>	Show to whom, date, and address of delivery. \$_____	

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

James Nicotero, Treasurer
978 Center Oak Drive
Pittsburg, Pa. 15237

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<u>438034</u>	

(Always show signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☒ Authorized agent

[Signature]

DATE OF DELIVERY 5/10/78 JPH

4. ADDRESS (Complete only if request for return)

5. UNABLE TO DELIVER BECAUSE:

RECEIVED MAY 10 1978
U.S. MAIL
P.O. CLERK'S INITIAL

★ 879 - 877 - 0-204-257



FEDERAL ELECTION COMMISSION

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

May 5, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Roberta Eastin, Treasurer
Florida Citizens for a Better
Government
Route 5, Box 147
Leesburg, Florida 32748

Re: MUR 490 (78)

Dear Ms. Eastin:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that you, as treasurer of your committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that you may be in violation of 2 U.S.C. §433(b)(2) for failing to disclose the committee's affiliation with other organizations. We have numbered this matter MUR 490 (78).

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

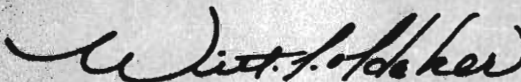
If you have any questions, please contact Christopher Tow, the attorney assigned to this matter at (202) 523-4073.

- 2 -

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel notify us in writing.

Sincerely,



William C. Oldaker
General Counsel

790401004



FEDERAL ELECTION COMMISSION

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

May 5, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Maurice Eastin, Treasurer
Concerned Citizens of Florida
Route 5, Box 147
Leesburg, Florida 32748

Re: MUR 490 (78)

Dear Mr. Eastin:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that you, as treasurer of your committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that you may be in violation of 2 U.S.C. §433(b)(2) for failing to disclose the committee's affiliation with other organizations. We have numbered this matter MUR 490 (78).

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

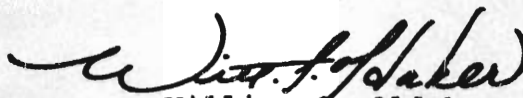
The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

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This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel notify us in writing.

Sincerely,


William C. Oldaker
General Counsel

79040100433

TAW MUR-490

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

2. ARTICLE ADDRESSED TO:
Maurice Eastin, Treasurer
Rt. 5, Box 147
Leesburg, Fla. 32748

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
439077

4. I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
DATE OF DELIVERY 5/11/78

5. ADDRESS (Complete only if registered)
LEESBURG, FLA.

6. UNABLE TO DELIVER BECAUSE
REASON INITIALS

★ 678-100-O-234-737



FEDERAL ELECTION COMMISSION

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

May 5, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Barbara Nolen, Treasurer
New York Taxpayers United for a
More Effective Congress
Guard Hill Road
Bedford, New York 10506

Re: MUR 490 (78)

Dear Ms. Nolen:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that you, as treasurer of your committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that you may be in violation of 2 U.S.C. §433(b)(2) for failing to disclose the committee's affiliation with other organizations. We have numbered this matter MUR 490 (78).

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The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

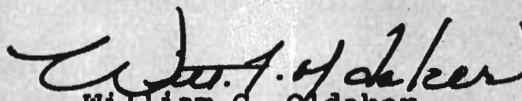
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- 2 -

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If you intend to be represented by counsel in this matter, please have such counsel notify us in writing.

Sincerely,


William C. Oldaker
General Counsel

790401004



FEDERAL ELECTION COMMISSION

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

May 5, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James Hebert, Chairman
Taxpayers Allied for Good
Government
1816 Rice Blvd.
Houston, Texas 77006

Re: MUR 490 (78)

Dear Mr. Hebert:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that you, as chairman of your committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that you may be in violation of 2 U.S.C. §433(b)(2) for failing to disclose the committee's affiliation with other organizations. We have numbered this matter MUR 490 (78).

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Christopher Tow, the attorney assigned to this matter at (202) 523-4073.

If you intend to be represented by counsel in this matter, please have such counsel notify us in writing.

W. A. J. de Klerk

William C. Oldaker
General Counsel

Domestic Registered Mail

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

1. The following service is requested (check one).

☐ Show to whom and date delivered.

☐ Show to whom, date, and address of delivery.

☐ **RESTRICTED DELIVERY**
Show to whom and date delivered.

☐ **RESTRICTED DELIVERY**
Show to whom, date, and address of delivery.

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
James Herbert Chairman
1816 Rice Blvd.
Houston, Texas 77006

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	886907	

(Always obtain signature of addressee or agent)

I have received the article described above.


SIGNATURE ☐ Addressee ☒ Authorized Agent

M. M. Shewchuk

4. DATE OF DELIVERY
5-22-78

5. ADDRESS (Complete only if return required)

6. UNABLE TO DELIVER BECAUSE:



U.S. POST OFFICE - HOUSTON, TEXAS

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Concerned Pennsylvania Taxpayers
Committee
Southwest Citizens for Good
Government
Southwest Good Government Committee
Citizens for Effective Government
New Jersey Citizens for Representative
Government
Alliance for Better Government
United Taxpayers for Good Government
Taxpayers for Better Government
Concerned Taxpayers for Better Government
Florida Citizens for a Better Government
Concerned Citizens of Florida
Taxpayers Allied for Good Government
New York Taxpayers United for a More
Effective Congress

MUR 490 (78)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on May 3, 1978, the Commission determined by a vote of 5-0 to adopt the recommendation of the General Counsel to take the following actions in the above-captioned matter:

1. Find reason to believe that the above-named committees are in violation of 2 U.S.C. Section 433(b)(2).
2. Send the letters attached to the General Counsel's Report signed April 28, 1978.

Commissioner Aikens was not present at the time of the vote.

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Date: May 4, 1978

79040100413

Before the Federal Election Commission

April 20, 1978

In the Matter of

Concerned Pennsylvania Taxpayers
Committee

Southwest Citizens for Good
Government

Southwest Good Government Committee
Citizens for Effective Government

New Jersey Citizens for Representative
Government

Alliance for Better Government

United Taxpayers for Good Government

Taxpayers for Better Government

Concerned Taxpayers for Better
Government

Florida Citizens for a Better
Government

Concerned Citizens of Florida

Taxpayers Allied for Good Government

New York Taxpayers United for a More
Effective Congress

MUR 490 (78)

General Counsel's Report

Background

As set forth in the First General Counsel's Report dated February 3, 1978, it was alleged that a number of committees were being formed in conjunction with one another for the common purpose of funneling contributions to certain federal candidates. Certain similarities among the committees' registration statements were pointed out. Also, the report indicated that this activity might constitute a violation of several sections of the Act including 2 U.S.C. §433(b)(2) for failure to disclose affiliated and/or connected organizations. It was recommended that the Commission

79040100419

await the committees' responses to the Requests for Additional Information sent by the Reports Analysis Division.

Since the filing of this First General Counsel's Report, 8 more similar committees have registered bringing the total to 13. In addition, Reports Analysis has received responses to their previous requests and has completed a comparison of the 13 committees pointing out similarities in their organization, their contributors, and their correspondence.

Preliminary Legal Analysis

2 U.S.C. §433(b)(2) requires that a political committee registering with the Commission include in the contents of its Statement of Organization the names, addresses, and relationships of affiliated or connected organizations. Also, 11 C.F.R. §100.14(c) defines an affiliated committee as one established, financed, maintained, or controlled by the same corporation, labor organization, person, or group of persons, including any parent, subsidiary, branch, division, department, or local unit thereof. Indicia of "establishing, financing, maintaining or controlling" include similar patterns of contributions to the committees. 11 C.F.R. §100.14(c)(ii)(D).

In their Statements of Organization, the committees left blank the spaces provided for indicating affiliation. Later, in their responses to the Requests for Additional Information, the committee treasurers stated that the space for listings of affiliated and connected organizations should be answered "none."

An overview of the comparisons between the respondent committees compiled by Reports Analysis reveals many similarities.

79040100420

Most prominent of these are:

1. Statements of Organization

- a) All were filed at approximately the same time.
- b) No responses were made by any of the respondents to questions 5, 6, 8, 9, and 15
- c) The answers to duration of committee existence for question 13 are identical-- "indefinite existence."
- d) Similarity in Committee names.
- e) The dates for question 3 are identical-- "December 26, 1977" for 12 of the 13 committees.
- f) The responses to question number 2 are identical-- "Not Assigned" for 12 of the 13 committees.
- g) The names of the banks for 10 of the 13 respondent committees in question 14 were handwritten whereas the rest of the report was typewritten. One committee had no bank and no treasurer listed. Two committees listed banks in typewritten form.

2. Similarities in Contributions

- a) 9 out of 10 of the individuals itemized contributing more than \$100 were doctors in all respondent committees' year end reports.
- b) Over 75% of all contributors listed on the respondent committees' year end reports were disclosed by at least two different committees.
- c) All contributors who gave to more than one of the respondent committees gave to each committee they contributed to the same amount on the same day. In particular, Helen Gray (Treasurer of the "Concerned Pennsylvania Taxpayers Committee") was disclosed in all year end reports for contributing \$100 on 12/26/77.

3. Similarities in responses to our Requests for Additional Information by 11 of 13 committees

- a) Similar style of writing.
- b) Identical closing sentence and identical opening lines.
- c) No dates typed on any of the letters.

79040100421

In light of these facts, it appears the committees may be affiliated within the meaning of 11 C.F.R. §100.14(c). Therefore, the committees may be in violation of 2 U.S.C. §433(b)(2) for failing to disclose their affiliation with each other or their connection with a parent or umbrella organization.

Recommendation

Find reason to believe that the following committees are in violation of 2 U.S.C. §433(b)(2):

Concerned Pennsylvania Taxpayers Committee
Southwest Citizens for Good Government
Southwest Good Government Committee
Citizens for Effective Government
New Jersey Citizens for Representative Government
Alliance for Better Government
United Taxpayers for Good Government
Taxpayers for Better Government
Concerned Taxpayers for Better Government
Florida Citizens for a Better Government
Concerned Citizens of Florida
Taxpayers Allied for Good Government
New York Taxpayers United for a More Effective Congress.

Also send attached letters.

4/28/78

W. J. Lee

79040100422



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Helen Gray, Treasurer
Concerned Pennsylvania Taxpayers Committee
664 Ridgely Avenue
Pittsburg, Pennsylvania 15216

Re: MUR 490 (78)

Dear Ms. Gray:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that you, as treasurer of your committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that you may be in violation of 2 U.S.C. §433(b)(2) for failing to disclose the committee's affiliation with other organizations. We have numbered this matter MUR 490 (78).

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Christopher Tow, the attorney assigned to this matter at (202) 523-4073.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

79040100424



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Arnold Roland, Treasurer
Southwest Citizens for Good
Government
7350 Caminito Carlotta
San Diego, California 92121

Re: MUR 490 (78)

Dear Mr. Roland:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that you, as treasurer of your committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that you may be in violation of 2 U.S.C. §433(b)(2) for failing to disclose the committee's affiliation with other organizations. We have numbered this matter MUR 490 (78).

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The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Christopher Tow, the attorney assigned to this matter at (202) 523-4073.

- 2 -

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

79040100426



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Joel Mann, Treasurer
Southwest Good Government
Committee
13150 S.W. 71st Avenue
Miami, Florida

Re: MUR 490 (78)

Dear Mr. Mann:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that you, as treasurer of your committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that you may be in violation of 2 U.S.C. §433(b)(2) for failing to disclose the committee's affiliation with other organizations. We have numbered this matter MUR 490 (78).

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- 2 -

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If you intend to be represented by counsel in this matter, please have such counsel notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

79040100428



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. David Prager, Treasurer
Citizens for Effective Government
1394 N. 39th Street
Allentown, Pennsylvania 18104

Re: MUR 490 (78)

Dear Mr. Prager:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that you, as treasurer of your committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that you may be in violation of 2 U.S.C. §433(b)(2) for failing to disclose the committee's affiliation with other organizations. We have numbered this matter MUR 490 (78).

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If you have any questions, please contact Christopher Tow, the attorney assigned to this matter at (202) 523-4073.

- 2 -

This matter will remain confidential in accordance with 2 U.S.C. §437g(a) (3) (B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

79040100430



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Carole Lippert, Treasurer
New Jersey Citizens for Representative
Government
Marie Major Drive
Alpine, New Jersey 07620

Re: MUR 490 (78)

Dear Ms. Lippert:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that you, as treasurer of your committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that you may be in violation of 2 U.S.C. §433(b)(2) for failing to disclose the committee's affiliation with other organizations. We have numbered this matter MUR 490 (78).

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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If you have any questions, please contact Christopher Tow, the attorney assigned to this matter at (202) 523-4073.

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If you intend to be represented by counsel in this matter, please have such counsel notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

79040100432



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Marcia Cohen, Treasurer
Alliance for Better Government
381 Woodmere Blvd.
Woodmere, New York

Re: MUR 490 (78)

Dear Ms. Cohen:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that you, as treasurer of your committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that you may be in violation of 2 U.S.C. §433(b)(2) for failing to disclose the committee's affiliation with other organizations. We have numbered this matter MUR 490 (78).

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If you have any questions, please contact Christopher Tow, the attorney assigned to this matter at (202) 523-4073.

- 2 -

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If you intend to be represented by counsel in this matter, please have such counsel notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

79040100434



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Barbara Schwartz, Treasurer
United Taxpayers for Good
Government Committee
4024 MacNiff
Lafayette Hill, Pennsylvania 19444

Re: MUR 490 (78)

Dear Ms. Schwartz:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that you, as treasurer of your committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that you may be in violation of 2 U.S.C. §433(b)(2) for failing to disclose the committee's affiliation with other organizations. We have numbered this matter MUR 490 (78).

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Christopher Tow, the attorney assigned to this matter at (202) 523-4073.

- 2 -

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

79040100436



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Jerome Levien, Treasurer
Taxpayers for Better Government
35 Wilmington Drive
Dix Hills, New York 11746

Re: MUR 490 (78)

Dear Mr. Levien:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that you, as treasurer of your committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that you may be in violation of 2 U.S.C. §433(b)(2) for failing to disclose the committee's affiliation with other organizations. We have numbered this matter MUR 490 (78).

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The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Christopher Tow, the attorney assigned to this matter at (202) 523-4073.

- 2 -

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If you intend to be represented by counsel in this matter, please have such counsel notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

79040100438



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James Nicotero, Treasurer
Concerned Taxpayers for Better
Government
978 Center Oak Drive
Pittsburg, Pennsylvania 15237

Re: MUR 490 (78)

Dear Mr. Nicotero:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that you, as treasurer of your committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that you may be in violation of 2 U.S.C. §433(b)(2) for failing to disclose the committee's affiliation with other organizations. We have numbered this matter MUR 490 (78).

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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If you have any questions, please contact Christopher Tow, the attorney assigned to this matter at (202) 523-4073.

- 2 -

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel notify us in writing.

Sincerely,

William C. Urdaker
General Counsel

79040100440



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Roberta Eastin, Treasurer
Florida Citizens for a Better
Government
Route 5, Box 147
Leesburg, Florida 32748

Re: MUR 490 (78)

Dear Ms. Eastin:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that you, as treasurer of your committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that you may be in violation of 2 U.S.C. §433(b)(2) for failing to disclose the committee's affiliation with other organizations. We have numbered this matter MUR 490 (78).

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If you have any questions, please contact Christopher Tow, the attorney assigned to this matter at (202) 523-4073.

- 2 -

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If you intend to be represented by counsel in this matter, please have such counsel notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

79040100442



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Maurice Eastin, Treasurer
Concerned Citizens of Florida
Route 5, Box 147
Leesburg, Florida 32748

Re: MUR 490 (78)

Dear Mr. Eastin:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that you, as treasurer of your committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that you may be in violation of 2 U.S.C. §433(b)(2) for failing to disclose the committee's affiliation with other organizations. We have numbered this matter MUR 490 (78).

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- 2 -

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If you intend to be represented by counsel in this matter, please have such counsel notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

79040100441



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James Hebert, Chairman
Taxpayers Allied for Good
Government
1816 Rice Blvd.
Houston, Texas 77006

Re: MUR 490 (78)

Dear Mr. Hebert:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that you, as treasurer of your committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that you may be in violation of 2 U.S.C. §433(b)(2) for failing to disclose the committee's affiliation with other organizations. We have numbered this matter MUR 490 (78).

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- 2 -

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If you intend to be represented by counsel in this matter, please have such counsel notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

79040100446



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Barbara Nolen, Treasurer
New York Taxpayers United for a
More Effective Congress
Guard Hill Road
Bedford, New York 10506

Re: MUR 490 (78)

Dear Ms. Nolen:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that you, as treasurer of your committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that you may be in violation of 2 U.S.C. §433(b)(2) for failing to disclose the committee's affiliation with other organizations. We have numbered this matter MUR 490 (78).

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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If you have any questions, please contact Christopher Tow, the attorney assigned to this matter at (202) 523-4073.

- 2 -

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

79040100448

Date _____

Analyst ROBERTO GARCIA

Team Chief STEVE MIMS

Compliance Review _____

TO: BILL OLDAKER

THROUGH: Staff Director ORLANDO POTTER

*AL for
CAR*

FROM: Assistant Staff Director for Reports Analysis TOM HASELHORST

DESCRIPTION:

Candidate/Committee CONCERNED PENNSYLVANIA TAXPAYERS COMMITTEE

Treasurer Helen Gray

Address 664 Ridgefeild Ave., PA 15216

REPORTS: (For reports reviewed, amendments, RFAI's, etc; see indices, Attachment 1)-(page 1)

Period Covered from 12/26/77 to 12/31/77

Total Receipts \$ 1,100

Total Expenditures \$ 0

Cash on Hand \$ 1,100

Debts \$ 0

REASON(S) FOR REFERRAL:

<u>Allegation(s)</u>	<u>Cite</u>	<u>Attachment</u>
Failure to disclose affiliation.	SS100.14(c) (2) (i) (D) & (E)	#2
Failure to disclose affiliation.	SS100.14(c) (2) (ii) (B) & (D)	#3
Failure to state controlling entity.	\$100.15	#4
Failure to disclose entire scope &/or jurisdiction.	SS102.2(a) (2) & (3)	#5
Failure to disclose all affiliated committees.	\$102.2(b) (1) (ii) (A)	#6
Failure to disclose "connected organization".	\$102.2(b) (2)	#7
Failure to report transferred funds of each committee.	\$104.2(b) (4)	#8

HISTORY:

This committee is similar to;

100% in establishment of committee,

83.3% in response to requests for additional information, and

75% in reports of Receipts and Expenditures,

of the twelve committees listed below.

B) SOUTHWEST CITIZENS FOR GOOD GOVERNMENT

C) SOUTHWEST GOOD GOVERNMENT COMMITTEE

D) CITIZENS FOR EFFECTIVE GOVERNMENT

E) NEW JERSEY CITIZENS FOR REPRESENTATIVE GOVERNMENT

F) ALLIANCE FOR BETTER GOVERNMENT

G) UNITED TAXPAYERS FOR GOOD GOVERNMENT COMMITTEE

H) TAXPAYERS FOR BETTER GOVERNMENT

I) CONCERNED TAXPAYERS FOR BETTER GOVERNMENT

(continued from page 1A)

- J) FLORIDA CITIZENS FOR A BETTER GOVERNMENT
- K) CONCERNED CITIZENS OF FLORIDA
- L) TAXPAYERS ALLIED FOR GOOD GOVERNMENT
- M) NEW YORK TAXPAYERS UNITED FOR A MORE EFFECTIVE
CONGRESS

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REPORTS ANALYSIS REFERRAL SHEET

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D #

Date _____

Analyst ROBERTO GARCIA PG

TO: BILL OLDAKER

Team Chief STEVE MIMS SM

Compliance Review _____

THROUGH: Staff Director ORLANDO POTTER

FROM: Assistant Staff Director for Reports Analysis TOM HASELHORST

DESCRIPTION:

Candidate/Committee SOUTHWEST CITIZENS FOR GOOD GOVERNMENT

Treasurer Arnold Roland

Address 7350 Caminito Carlotta, CA 92121

REPORTS: (For reports reviewed, amendments, RFAI's, etc; see indices, Attachment 1)-(page 2)

Period Covered from 12/26/77 to 12/31/77

Total Receipts \$ 3,725 Total Expenditures \$ 0

Cash on Hand \$ 3,725 Debts \$ 0

REASON(S) FOR REFERRAL:

<u>Allegation(s)</u>	<u>Cite</u>	<u>Attachment</u>
<u>Failure to disclose affiliation.</u>	<u>SS100.14(c) (2) (i) (D) & (E)</u>	<u>#2</u>
<u>Failure to disclose affiliation.</u>	<u>SS100.14(c) (2) (ii) (B) & (D)</u>	<u>#3</u>
<u>Failure to state controlling entity.</u>	<u>\$100.15</u>	<u>#4</u>
<u>Failure to disclose entire scope &/or jurisdiction.</u>	<u>SS102.2(a) (2) & (3)</u>	<u>#5</u>
<u>Failure to disclose all affiliated committees.</u>	<u>\$102.2(b) (1) (ii) (A)</u>	<u>#6</u>
<u>Failure to disclose "connected organization".</u>	<u>\$102.2(b) (2)</u>	<u>#7</u>
<u>Failure to report transferred funds of each committee.</u>	<u>\$104.2(b) (4)</u>	<u>#8</u>

HISTORY:

This committee is similar to ;

100% in establishment of committee,

83.3% in response to requests for additional information, and

75% in reports of Receipts and Expenditures,

of the twelve committees listed below.

C) SOUTHWEST GOOD GOVERNMENT COMMITTEE

D) CITIZENS FOR EFFECTIVE GOVERNMENT

E) NEW JERSEY CITIZENS FOR REPRESENTATIVE GOVERNMENT

F) ALLIANCE FOR BETTER GOVERNMENT

G) UNITED TAXPAYERS FOR GOOD GOVERNMENT COMMITTEE

H) TAXPAYERS FOR BETTER GOVERNMENT

I) CONCERNED TAXPAYERS FOR BETTER GOVERNMENT

J) FLORIDA CITIZENS FOR A BETTER GOVERNMENT

RAD File # _____

(continued from page 1B)

- K) CONCERNED CITIZENS OF FLORIDA
- L) TAXPAYERS UNITED FOR GOOD GOVERNMENT
- M) NEW YORK TAXPAYERS UNITED FOR A MORE EFFECTIVE
CONGRESS
- A) CONCERNED PENNSYLVANIA TAXPAYERS COMMITTEE

● 7 9 0 4 0 1 0 0 ● 5 4

Date _____

Analyst ROBERTO GARCIA *RG*

TO: BILL OLDAKER

Team Chief STEVE MIMS *SM*

Compliance Review _____

THROUGH: Staff Director ORLANDO POTTER

FROM: Assistant Staff Director for Reports Analysis TOM HASELHORST

DESCRIPTION:

Candidate/Committee SOUTHWEST GOOD GOVERNMENT COMMITTEE

Treasurer Joel Mann

Address 13150 S.W. 71st Avenue; Miami, FL

REPORTS: (For reports reviewed, amendments, RFAI's, etc; see indices, Attachment 1)-(page 3)

Period Covered from 12/26/77 to 12/31/77

Total Receipts \$ 3,225 Total Expenditures \$ 0

Cash on Hand \$ 3,225 Debts \$ 0

REASON(S) FOR REFERRAL:

<u>Allegation(s)</u>	<u>Cite</u>	<u>Attachment</u>
<u>Failure to disclose affiliation.</u>	<u>SS100.14(c) (2) (i) (D) & (E)</u>	<u>#2</u>
<u>Failure to disclose affiliation.</u>	<u>SS100.14(c) (2) (ii) (B) & (D)</u>	<u>#3</u>
<u>Failure to state controlling entity.</u>	<u>\$100.15</u>	<u>#4</u>
<u>Failure to disclose entire scope &/or jurisdiction.</u>	<u>SS102.2(a) (2) & (3)</u>	<u>#5</u>
<u>Failure to disclose all affiliated committees.</u>	<u>\$102.2(b) (1) (ii) (A)</u>	<u>#6</u>
<u>Failure to disclose "connected organization".</u>	<u>\$102.2(b) (2)</u>	<u>#7</u>
<u>Failure to report transfered funds of each committee.</u>	<u>\$104.2(b) (4)</u>	<u>#8</u>

HISTORY:

This committee is similar to;

100% in establishment of committee,
83.3% in response to requests for additional information, and
75% in reports of Receipts and Expenditures,
of the twelve committees listed below.

- D) CITIZENS FOR EFFECTIVE GOVERNMENT
- E) NEW JERSEY CITIZENS FOR REPRESENTATIVE GOVERNMENT
- F) ALLIANCE FOR BETTER GOVERNMENT
- G) UNITED TAXPAYERS FOR GOOD GOVERNMENT COMMITTEE
- H) TAXPAYERS FOR BETTER GOVERNMENT
- I) CONCERNED TAXPAYERS FOR BETTER GOVERNMENT
- J) FLORIDA CITIZENS FOR BETTER GOVERNMENT
- K) CONCERNED CITIZENS OF FLORIDA

(continued from page 1C)

- L) TAXPAYERS ALLIED FOR GOOD GOVERNMENT
- M) NEW YORK TAXPAYERS UNITED FOR A MORE EFFECTIVE
CONGRESS
- A) CONCERNED PENNSYLVANIA TAXPAYERS COMMITTEE
- B) SOUTHWEST CITIZENS FOR GOOD GOVERNMENT

● 7 9 0 4 0 1 0 0 ● 5 7

REPORTS ANALYSIS REFERRAL SHEET

7 9 0 4 0 1 0 0 5 8

D #

Date _____

Analyst ROBERTO GARCIA PG

TO: BILL OLDAKER

Team Chief STEVE MIMS SM

Compliance Review _____

THROUGH: Staff Director ORLANDO POTTER

FROM: Assistant Staff Director for Reports Analysis TOM HASELHORST

DESCRIPTION:

Candidate/Committee CITIZENS FOR EFFECTIVE GOVERNMENT

Treasurer David Prager

Address 1394 N. 39th Street, Allentown, PA 18104

REPORTS: (For reports reviewed, amendments, RFAI's, etc; see indices, Attachment 1)-(page 4)

Period Covered from 12/26/77 to 12/31/77

Total Receipts \$ 2,875 Total Expenditures \$ 0

Cash on Hand \$ 2,875 Debts \$ 0

REASON(S) FOR REFERRAL:

<u>Allegation(s)</u>	<u>Cite</u>	<u>Attachment</u>
<u>Failure to disclose affiliation.</u>	<u>SS100.14(c) (2) (i) (D) & (E)</u>	<u>#2</u>
<u>Failure to disclose affiliation.</u>	<u>SS100.14(c) (2) (ii) (B) & (D)</u>	<u>#3</u>
<u>Failure to state controlling entity.</u>	<u>\$100.15</u>	<u>#4</u>
<u>Failure to disclose entire scope &/or jurisdiction.</u>	<u>SS102.2(a) (2) & (3)</u>	<u>#5</u>
<u>Failure to disclose all affiliated committees.</u>	<u>\$102.2(b) (1) (ii) (A)</u>	<u>#6</u>
<u>Failure to disclose "connected organization".</u>	<u>\$102.2(b) (2)</u>	<u>#7</u>
<u>Failure to report transfered funds of each committee.</u>	<u>\$104.2(b) (4)</u>	<u>#8</u>

HISTORY:

This committee is similar to;

100% in establishment of committee,

83.3% in response to requests for additional information, and

75% in reports of Receipts and Expenditures,

of the twelve committees listed below.

- E) NEW JERSEY CITIZENS FOR REPRESENTATIVE GOVERNMENT
- F) ALLIANCE FOR BETTER GOVERNMENT
- G) UNITED TAXPAYERS FOR GOOD GOVERNMENT
- H) TAXPAYERS FOR BETTER GOVERNMENT
- I) CONCERNED TAXPAYERS FOR BETTER GOVERNMENT
- J) FLORIDA CITIZENS FOR A BETTER GOVERNMENT
- K) CONCERNED CITIZENS OF FLORIDA
- L) TAXPAYERS ALLIED FOR GOOD GOVERNMENT

RAD File # _____

(continued from page 1D)

- M) NEW YORK TAXPAYERS UNITED FOR A MORE EFFECTIVE
CONGRESS
- A) CONCERNED PENNSYLVANIA TAXPAYERS COMMITTEE
- B) SOUTHWEST CITIZENS FOR GOOD GOVERNMENT
- C) SOUTHWEST GOOD GOVERNMENT COMMITTEE

● 7 9 0 4 0 1 0 0 ● 6 0

REPORTS ANALYSIS REFERRAL SHEET 6 1

D #

Date _____

Analyst ROBERTO GARCIA *PG*

TO: BILL OLDAKER

Team Chief STEVE MIMS *SHH*

Compliance Review _____

THROUGH: Staff Director ORLANDO POTTER

FROM: Assistant Staff Director for Reports Analysis TOM HASELHORST

DESCRIPTION:

Candidate/Committee NEW JERSEY CITIZENS FOR REPRESENTATIVE GOVERNMENT

Treasurer Carole Lippert

Address Marie Major Drive; Alpine, NJ 07620

REPORTS: (For reports reviewed, amendments, RFAI's, etc; see indices, Attachment 1)-(page 5)

Period Covered from 12/26/77 to 12/31/77

Total Receipts \$ 2,100 Total Expenditures \$ 0

Cash on Hand \$ 2,100 Debts \$ 0

REASON(S) FOR REFERRAL:

<u>Allegation(s)</u>	<u>Cite</u>	<u>Attachment</u>
Failure to disclose affiliation.	SS100.14(c) (2) (i) (D) & (E)	#2
Failure to disclose affiliation.	SS100.14(c) (2) (ii) (B) & (D)	#3
Failure to state controlling entity.	\$100.15	#4
Failure to disclose entire scope &/or jurisdiction.	SS102.2(a) (2) & (3)	#5
Failure to disclose all affiliated committees.	\$102.2(b) (1) (ii) (A)	#6
Failure to disclose "connected organization".	\$102.2(b) (2)	#7
Failure to report transferred funds of each committee.	\$104.2(b) (4)	#8

HISTORY:

This committee is similar to:

100% in establishment of committee.

83.3% in response to request for additional information, and

75% in reports of Receipts and Expenditures.

of the twelve committees listed below.

F) ALLIANCE FOR BETTER GOVERNMENT

G) UNITED TAXPAYERS FOR GOOD GOVERNMENT COMMITTEE

H) TAXPAYERS FOR BETTER GOVERNMENT

I) CONCERNED TAXPAYERS FOR BETTER GOVERNMENT

J) FLORIDA CITIZENS FOR A BETTER GOVERNMENT

K) CONCERNED CITIZENS OF FLORIDA

L) TAXPAYERS ALLIED FOR GOOD GOVERNMENT

M) NEW YORK TAXPAYERS UNITED FOR A MORE EFFECTIVE CONGRESS

RAD File # _____

(page 2E)

(continued from page 1E)

- A) CONCERNED PENNSYLVANIA TAXPAYERS COMMITTEE
- B) SOUTHWEST CITIZENS FOR GOOD GOVERNMENT
- C) SOUTHWEST GOOD GOVERNMENT COMMITTEE
- D) CITIZENS FOR EFFECTIVE GOVERNMENT

● 7 9 0 4 0 1 0 0 ● 6 3

REPORTS ANALYSIS REFERRAL SHEET

7 9 0 4 0 1 0 0 6 4

D #

Date

Analyst ROBERTO GARCIA

TO: BILL OLDAKER

Team Chief STEVE MIMS

Compliance Review

THROUGH: Staff Director ORLANDO POTTER

FROM: Assistant Staff Director for Reports Analysis TOM HASELHORST

DESCRIPTION:

Candidate/Committee ALLIANCE FOR BETTER GOVERNMENT

Treasurer Marcia Cohen

Address 381 Woodmere Blvd.; Woodmere, New York

REPORTS: (For reports reviewed, amendments, RFAI's, etc; see indices, Attachment 1)-(page 6)

Period Covered from 12/26/77 to 12/31/77

Total Receipts \$ 1,700 Total Expenditures \$ 0

Cash on Hand \$ 1,700 Debts \$ 0

REASON(S) FOR REFERRAL:

Allegation(s)	Cite	Attachment
Failure to disclose affiliation.	SS100.14(c) (2) (i) (D) & (E)	#2
Failure to disclose affiliation.	SS100.14(c) (2) (ii) (B) & (D)	#3
Failure to state controlling entity.	\$100.15	#4
Failure to disclose entire scope &/or jurisdiction.	SS102.2(a) (2) & (3)	#5
Failure to disclose all affiliated committees.	\$102.2(b) (1) (ii) (A)	#6
Failure to disclose "connected organization".	\$102.2(b) (1) (2)	#7
Failure to report transferred funds of each committee.	\$104.2(b) (4)	#8

HISTORY:

This committee is similar to;

100% in establishment of committee,

83.3% in response to request for additional information, and

75% in reports of Receipts and Expenditures,

of the twelve committees listed below.

G) UNITED TAXPAYERS FOR GOOD GOVERNMENT COMMITTEE

H) TAXPAYERS FOR BETTER GOVERNMENT

I) CONCERNED TAXPAYERS FOR BETTER GOVERNMENT

J) FLORIDA CITIZENS FOR A BETTER GOVERNMENT

K) CONCERNED CITIZENS OF FLORIDA

L) TAXPAYERS ALLIED FOR GOOD GOVERNMENT

M) NEW YORK TAXPAYERS UNITED FOR A MORE EFFECTIVE CONGRESS

A) CONCERNED PENNSYLVANIA TAXPAYERS COMMITTEE

RAD File #

(continued from page 1F)

- B) SOUTHWEST CITIZENS FOR GOOD GOVERNMENT
- C) SOUTHWEST GOOD GOVERNMENT COMMITTEE
- D) CITIZENS FOR EFFECTIVE GOVERNMENT
- E) NEW JERSEY CITIZENS FOR REPRESENTATIVE GOVERNMENT

7 9 0 4 0 1 0 0 4 6 6

Date

Analyst ROBERTO GARCIA

TO: BILL OLDAKER

Team Chief STEVE MIMS

Compliance Review

THROUGH: Staff Director ORLANDO POTTER

FROM: Assistant Staff Director for Reports Analysis TOM HASELHORST

DESCRIPTION:

Candidate/Committee UNITED TAXPAYERS FOR GOOD GOVERNMENT

Treasurer Barbara Schwartz

Address 4024 Mac Niff, Lafayette Hill, PA 19444

REPORTS: (For reports reviewed, amendments, RFAI's, etc; see indices, Attachment 1)-(page 7)

Period Covered from 12/26/77 to 12/31/77

Total Receipts \$ 1.650 Total Expenditures \$ 0

Cash on Hand \$ 1.650 Debts \$ 0

REASON(S) FOR REFERRAL:

Allegation(s)	Cite	Attachment
Failure to disclose affiliation.	SS100.14(c) (2) (i) (D) & (E)	#2
Failure to disclose affiliation.	SS100.14(c) (2) (ii) (B) & (D)	#3
Failure to state controlling entity.	\$100.15	#4
Failure to disclose entire scope &/or jurisdiction.	SS102.2(a) (2) & (3)	#5
Failure to disclose all affiliated committees.	\$102.2(b) (1) (ii) (A)	#6
Failure to disclose "connected organization".	\$102.2(b) (2)	#7
Failure to report transfered funds of each committee.	\$104.2(b) (4)	#8

HISTORY:

This committee is similar to;

100% in establishment of committee,
83.3% in response to requests for additional information, and
75% in reports of Receipts and Expenditures,
of the twelve committees listed below.

H)	TAXPAYERS FOR BETTER GOVERNMENT
I)	CONCERNED TAXPAYERS FOR BETTER GOVERNMENT
J)	FLORIDA CITIZENS FOR A BETTER GOVERNMENT
K)	CONCERNED CITIZENS OF FLORIDA
L)	TAXPAYERS ALLIED FOR GOOD GOVERNMENT
M)	NEW YORK TAXPAYERS UNITED FOR A MORE EFFECTIVE CONGRESS
A)	CONCERNED PENNSYLVANIA TAXPAYERS COMMITTEE
B)	SOUTHWEST CITIZENS FOR GOOD GOVERNMENT

(continued from page 1G)

- C) SOUTHWEST GOOD GOVERNMENT COMMITTEE
- D) CITIZENS FOR EFFECTIVE GOVERNMENT
- E) NEW JERSEY CITIZENS FOR REPRESENTATIVE
GOVERNMENT
- F) ALLIANCE FOR BETTER GOVERNMENT

7 9 0 4 0 1 0 0 4 6 9

Date _____

Analyst ROBERTO GARCIA *RG*

TO: BILL OLDAKER

Team Chief STEVE MIMS *SM*

Compliance Review _____

THROUGH: Staff Director ORLANDO POTTER

FROM: Assistant Staff Director for Reports Analysis TOM HASELHORST

DESCRIPTION:

Candidate/Committee TAXPAYERS FOR BETTER GOVERNMENTTreasurer Jerome LevienAddress 35 Wilmington Drive, Dix Hills, NY 11746

REPORTS: (For reports reviewed, amendments, RFAI's, etc; see indices, Attachment 1)-(page 8)

Period Covered from 12/26/77 to 12/36/77Total Receipts \$ 1,175 Total Expenditures \$ 0Cash on Hand \$ 1,175 Debts \$ 0

REASON(S) FOR REFERRAL:

<u>Allegation(s)</u>	<u>Cite</u>	<u>Attachment</u>
<u>Failure to disclose affiliation.</u>	<u>SS100.14(c) (2) (i) (D) & (E)</u>	<u>#2</u>
<u>Failure to disclose affiliation.</u>	<u>SS100.14(c) (2) (ii) (B) & (D)</u>	<u>#3</u>
<u>Failure to state controlling entity.</u>	<u>\$100.15</u>	<u>#4</u>
<u>Failure to disclose entire scope &/or jurisdiction.</u>	<u>SS102.2(a) (2) & (3)</u>	<u>#5</u>
<u>Failure to disclose all affiliated committees.</u>	<u>\$102.2(b) (1) (ii) (A)</u>	<u>#6</u>
<u>Failure to disclose "connected organization".</u>	<u>\$102.2(b) (2)</u>	<u>#7</u>
<u>Failure to report transferred funds of each committee.</u>	<u>\$104.2(b) (4)</u>	<u>#8</u>

HISTORY:

This committee is similar to;

100% in establishment of committee,83.3% in response to requests for additional information, and75% in reports of Receipts and Expenditures,of the twelve committees listed below.I) CONCERNED TAXPAYERS FOR BETTER GOVERNMENTJ) FLORIDA CITIZENS FOR A BETTER GOVERNMENTK) CONCERNED CITIZENS OF FLORIDAL) TAXPAYERS ALLIED FOR GOOD GOVERNMENTM) NEW YORK TAXPAYERS UNITED FOR A MORE EFFECTIVE CONGRESSA) CONCERNED PENNSYLVANIA TAXPAYERS COMMITTEEB) SOUTHWEST CITIZENS FOR GOOD GOVERNMENTC) SOUTHWEST GOOD GOVERNMENT COMMITTEE

RAD File # _____

(continued from page 1H)

- D) CITIZENS FOR EFFECTIVE GOVERNMENT
- E) NEW JERSEY CITIZENS FOR REPRESENTATIVE GOVERNMENT
- F) ALLIANCE FOR BETTER GOVERNMENT
- G) UNITED TAXPAYERS FOR GOOD GOVERNMENT

7 9 0 4 0 1 0 0 7 2

Date _____

Analyst ROBERTO GARCIA

TO: BILL OLDAKER

Team Chief STEVE MIMS

Compliance Review _____

THROUGH: Staff Director ORLANDO POTTER

FROM: Assistant Staff Director for Reports Analysis TOM HASELHORST

DESCRIPTION:

Candidate/Committee CONCERNED TAXPAYERS FOR BETTER GOVERNMENTTreasurer James NicoteroAddress 978 Center Oak Drive, Pittsburgh, PA 15237

REPORTS: (For reports reviewed, amendments, RFAI's, etc; see indices, Attachment 1)-(page 9)

Period Covered from 12/26/77 to 12/31/77Total Receipts \$ 1,000 Total Expenditures \$ 0Cash on Hand \$ 1,000 Debts \$ 0

REASON(S) FOR REFERRAL:

<u>Allegation(s)</u>	<u>Cite</u>	<u>Attachment</u>
Failure to disclose affiliation.	SS100.14(c) (2) (i) (D) & (E)	#2
Failure to disclose affiliation.	SS100.14(c) (2) (ii) (B) & (D)	#3
Failure to state controlling entity.	\$100.15	#4
Failure to disclose entire scope &/or jurisdiction.	SS102.2(a) (2) & (3)	#5
Failure to disclose all affiliated committees.	\$102.2(b) (1) (ii) (A)	#6
Failure to disclose "connected organization".	\$102.2(b) (2)	#7
Failure to report transferred funds of each committee.	\$104.2(b) (4)	#8

HISTORY:

This committee is similar to:100% in establishment of committee.83.3% in response to request for additional information, and75% in reports of Receipts and Expaenditures.of the twelve committees below.J) FLORIDA CITIZENS FOR A BETTER GOVERNMENTK) CONCERNED CITIZENS OF FLORIDAL) TAXPAYERS ALLIED FOR GOOD GOVERNMENTM) NEW YORK TAXPAYERS UNITED FOR A MORE EFFECTIVE CONGRESSA) CONCERNED PENNSYLVANIA TAXPAYERS COMMITTEEB) SOUTHWEST CITIZENS FOR GOOD GOVERNMENTC) SOUTHWEST GOOD GOVERNMENT COMMITTEED) CITIZENS FOR EFFECTIVE GOVERNMENT

RAD File # _____

(continued from page 1I)

- E) NEW JERSEY CITIZENS FOR REPRESENTATIVE
GOVERNMENT
- F) ALLIANCE FOR BETTER GOVERNMENT
- G) UNITED TAXPAYERS FOR GOOD GOVERNMENT COMMITTEE
- H) TAXPAYERS FOR BETTER GOVERNMENT

● 7 9 0 4 0 1 0 0 ● 7 5

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Date _____

Analyst ROBERTO GARCIA PG

TO: BILL OLDAKER

Team Chief STEVE MIMS SM

Compliance Review _____

THROUGH: Staff Director ORLANDO POTTER

FROM: Assistant Staff Director for Reports Analysis TOM HASELHORST

DESCRIPTION:

Candidate/Committee FLORIDA CITIZENS FOR A BETTER GOVERNMENT

Treasurer Roberta Eastin

Address Route 5, Box 147, Leesburg, FL 32748

REPORTS: (For reports reviewed, amendments, RFAI's, etc; see indices, Attachment 1)-(page 18)

Period Covered from 12/26/77 to 12/31/77

Total Receipts \$ 600 Total Expenditures \$ 0

Cash on Hand \$ 600 Debts \$ 0

REASON(S) FOR REFERRAL:

<u>Allegation(s)</u>	<u>Cite</u>	<u>Attachment</u>
Failure to disclose affiliation.	SS100.14(c) (2) (i) (D) & (E)	#2
Failure to disclose affiliation.	SS100.14(c) (2) (ii) (B) & (D)	#3
Failure to state controlling entity.	\$100.15	#4
Failure to disclose entire scope &/or jurisdiction.	SS102.2(a) (2) & (3)	#5
Failure to disclose all affiliated committees.	\$102.2(b) (1) (ii) (A)	#6
Failure to disclose "connected organization".	\$102.2(b) (2)	#7
Failure to report transferred funds of each committee.	\$104.2(b) (4)	#8

HISTORY:

This committee is similar to:

100% in establishment of committee.

83.3% in response to requests for additional information, and

75% in reports of Receipts and Expenditures.

of the twelve committees listed below.

K) CONCERNED CITIZENS OF FLORIDA

L) TAXPAYERS ALLIED FOR GOOD GOVERNMENT

M) NEW YORK TAXPAYERS UNITED FOR A MORE EFFECTIVE CONGRESS

A) CONCERNED PENNSYLVANIA TAXPAYERS COMMITTEE

B) SOUTHWEST CITIZENS FOR GOOD GOVERNMENT

C) SOUTHWEST GOOD GOVERNMENT COMMITTEE

D) CITIZENS FOR EFFECTIVE GOVERNMENT

E) NEW JERSEY CITIZENS FOR REPRESENTATIVE GOVERNMENT

RAD File # _____

(continued from page 1J)

- F) ALLIANCE FOR BETTER GOVERNMENT
- G) UNITED TAXPAYERS FOR GOOD GOVERNMENT COMMITTEE
- H) TAXPAYERS FOR BETTER GOVERNMENT
- I) CONCERNED TAXPAYERS FOR BETTER GOVERNMENT

7 9 0 4 0 1 0 0 4 7 8

Date _____

Analyst ROBERTO GARCIA *RG*TO: BILL OLDAKERTeam Chief STEVE MIMS *SM*

Compliance Review _____

THROUGH: Staff Director ORLANDO POTTERFROM: Assistant Staff Director for Reports Analysis TOM HASLEHORST

DESCRIPTION:

Candidate/Committee CONCERNED CITIZENS OF FLORIDATreasurer Maurice R. EastinAddress Route 5, Box 147, Leesburg, FL 32748

REPORTS: (For reports reviewed, amendments, RFAI's, etc; see indices, Attachment 1)-(page 11)

Period Covered from 12/26/77 to 12/31/77Total Receipts \$ 600 Total Expenditures \$ 0Cash on Hand \$ 600 Debts \$ 0

REASON(S) FOR REFERRAL:

<u>Allegation(s)</u>	<u>Cite</u>	<u>Attachment</u>
<u>Failure to disclose affiliation.</u>	<u>SS100.14(c) (2) (i) (D) & (E)</u>	<u>#2</u>
<u>Failure to disclose affiliation.</u>	<u>SS100.14(c) (2) (ii) (B) & (D)</u>	<u>#3</u>
<u>Failure to state controlling entity.</u>	<u>\$100.15</u>	<u>#4</u>
<u>Failure to disclose entire scope &/or jurisdiction.</u>	<u>SS102.2(a) (2) & (3)</u>	<u>#5</u>
<u>Failure to disclose all affiliated committees.</u>	<u>\$102.2(b) (1) (ii) (A)</u>	<u>#6</u>
<u>Failure to disclose "connected organization".</u>	<u>\$102.2(b) (2)</u>	<u>#7</u>
<u>Failure to report transferred funds of each committee.</u>	<u>\$104.2(b) (4)</u>	<u>#8</u>

HISTORY:

This committee is similar to:100% in establishment of committee,83.3% in response to requests for additional information, and75% in reports of Receipts and Expenditures,of the twelve committees listed below.L) TAXPAYERS ALLIED FOR GOOD GOVERNMENTM) NEW YORK TAXPAYERS UNITED FOR A MORE EFFECTIVE CONGRESSA) CONCERNED PENNSYLVANIA TAXPAYERS COMMITTEEB) SOUTHWEST CITIZENS FOR GOOD GOVERNMENTC) SOUTHWEST GOOD GOVERNMENT COMMITTEED) CITIZENS FOR EFFECTIVE GOVERNMENTE) NEW JERSEY CITIZENS FOR REPRESENTATIVE GOVERNMENTF) ALLIANCE FOR BETTER GOVERNMENT

RAD File # _____

(continued from page 1K)

- G) UNITED TAXPAYERS FOR GOOD GOVERNMENT COMMITTEE
- H) TAXPAYERS FOR BETTER GOVERNMENT
- I) CONCERNED TAXPAYERS FOR BETTER GOVERNMENT
- J) FLORIDA CITIZENS FOR A BETTER GOVERNMENT

● 7 9 0 4 0 1 0 0 ● 8 1

Date _____

Analyst ROBERTO GARCIA *RG*TO: BILL OLDAKERTeam Chief STEVE MIMS *SM*

Compliance Review _____

THROUGH: Staff Director ORLANDO POTTERFROM: Assistant Staff Director for Reports Analysis TOM HASELHORST

DESCRIPTION:

Candidate/Committee TAXPAYERS ALLIED FOR GOOD GOVERNMENTTreasurer Barbara WisemanAddress 318 Bird Key Drive, Sarasota, FL

REPORTS: (For reports reviewed, amendments, RFAI's, etc; see indices, Attachment 1)-(page 12)

Period Covered from 12/26/77 to 3/31/78Total Receipts \$ (blank) Total Expenditures \$ (blank)Cash on Hand \$ (blank) Debts \$ (blank)

REASON(S) FOR REFERRAL:

<u>Allegation(s)</u>	<u>Cite</u>	<u>Attachment</u>
<u>Failure to disclose affiliation.</u>	<u>SS100.14(c) (2) (i) (D) & (E)</u>	<u>#2</u>
<u>Failure to disclose affiliation.</u>	<u>SS100.14(c) (2) (ii) (B) & (D)</u>	<u>#3</u>
<u>Failure to state controlling entity.</u>	<u>\$100.15</u>	<u>#4</u>
<u>Failure to disclose entire scope &/or jurisdiction.</u>	<u>SS102.2(a) (2) & (3)</u>	<u>#5</u>
<u>Failure to disclose all affiliated committees.</u>	<u>\$102.2(b) (1) (ii) (A)</u>	<u>#6</u>
<u>Failure to disclose "connected organization".</u>	<u>\$102.2(b) (2)</u>	<u>#7</u>
<u>Failure to report.</u>	<u>\$104.4(d)</u>	<u>#9</u>

HISTORY:

This committee is similar to;100% of the twelve committees below, in the establishment of committee.M) NEW YORK TAXPAYERS UNITED FOR A MORE EFFECTIVE CONGRESSA) CONCERNED PENNSYLVANIA TAXPAYERS COMMITTEEB) SOUTHWEST CITIZENS FOR GOOD GOVERNMENTC) SOUTHWEST GOOD GOVERNMENT COMMITTEED) CITIZENS FOR EFFECTIVE GOVERNMENTE) NEW JERSEY CITIZENS FOR REPRESENTATIVE GOVERNMENTF) ALLIANCE FOR BETTER GOVERNMENTG) UNITED TAXPAYERS FOR GOOD GOVERNMENTH) TAXPAYERS FOR BETTER GOVERNMENTI) CONCERNED TAXPAYERS FOR BETTER GOVERNMENTJ) FLORIDA CITIZENS FOR A BETTER GOVERNMENTK) CONCERNED CITIZENS OF FLORIDA

RAD File # _____

● 7 9 0 4 0 1 0 0 ● 8 3

Date _____

Analyst ROBERTO GARCIA *RG*TO: BILL OLDAKERTeam Chief STEVE MIMS *SM*

Compliance Review _____

THROUGH: Staff Director ORLANDO POTTERFROM: Assistant Staff Director for Reports Analysis TOM HASELHORST

DESCRIPTION:

Candidate/Committee NEW YORK TAXPAYERS UNITED FOR A MORE EFFECTIVE CONGRESSTreasurer Barbara NolenAddress Guard Hill Road, Bedford, NY 10506

REPORTS: (For reports reviewed, amendments, RFAI's, etc; see indices, Attachment 1)-(Page 13)

Period Covered from 12/26/77 to 3/31/78Total Receipts \$ 0 Total Expenditures \$ 50Cash on Hand \$ 0 Debts \$ 0

REASON(S) FOR REFERRAL:

<u>Allegation(s)</u>	<u>Cite</u>	<u>Attachment</u>
Failure to disclose affiliation.	SS100.14(c) (2) (i) (D) & (E)	#2
Failure to disclose affiliation.	SS100.14(c) (2) (ii) (B) & (D)	#3
Failure to state controlling entity.	\$100.15	#4
Failure to disclose entire scope &/or jurisdiction.	SS102.2(a) (2) & (3)	#5
Failure to disclose all affiliated committees.	\$102.2(b) (1) (ii) (A)	#6
Failure to disclose "connected organization".	\$102.2(b) (2)	#7
Failure to report. (<i>INADEQUATE</i>)	\$104.4(d)	#10

HISTORY:

This committee is similar to;

100% of the committees listed below, in establishment of committee.A) CONCERNED PENNSYLVANIA TAXPAYERS COMMITTEEB) SOUTHWEST CITIZENS FOR GOOD GOVERNMENTC) SOUTHWEST GOOD GOVERNMENT COMMITTEED) CITIZENS FOR EFFECTIVE GOVERNMENTE) NEW JERSEY CITIZENS FOR REPRESENTATIVE GOVERNMENTF) ALLIANCE FOR BETTER GOVERNMENTG) UNITED TAXPAYERS FOR GOOD GOVERNMENTH) TAXPAYERS FOR BETTER GOVERNMENTI) CONCERNED TAXPAYERS FOR BETTER GOVERNMENTJ) FLORIDA CITIZENS FOR A BETTER GOVERNMENTK) CONCERNED CITIZENS OF FLORIDAL) TAXPAYERS ALLIED FOR GOOD GOVERNMENT

RAD File # _____



FEDERAL ELECTION COMMISSION

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

March 22, 1978

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS *mwe*

SUBJECT: MUR 490 (78) - Interim Report dated 3-17-78
Signed by General Counsel 3-17-78
Received in Office of Commission
Secretary 3-17-78, 4:07

The above-mentioned document was circulated to the
Commissioners on a 24 hour no-objection basis at 10:00 a.m.,
March 21, 1978.

As of 12:00, this date, no objections have been received
in the Office of Commission Secretary.

79040100485

March 27, 1978

MEMORANDUM TO: Marge Hanson
FROM: Elissa T. Carr
SUBJECT: SER 490

Please have the attached Interim Report on SER 490 distributed to the Commission on a 14 hour no-objection basis.

Thank you.

79040100486

BEFORE THE FEDERAL ELECTION COMMISSION
March 17, 1978

In the Matter of

Taxpayers Allied for Good Government

)
)
)
MUR 498(78)

Interim Report

On February 15, 1978 the Commission approved the recommendation of the General Counsel that no action be taken in this matter pending the receipt of responses by the committees in question to Requests for Additional Information sent by the Reports Analysis Division.

Reports Analysis has received most of the committees' responses and is preparing a memorandum to the General Counsel on the matter.

3/17/78
DATE

William C. Oldaker
WILLIAM C. OLDAKER
GENERAL COUNSEL

79040100437



FEDERAL ELECTION COMMISSION

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

February 28, 1978

Mrs. Barbara H. Wiseman
318 Bird Key Drive
Sarasota, Florida 33577

Dear Mrs. Wiseman,

Enclosed please find the materials which you sent to the attention of a Mr. Sears at the Federal Election Commission.

Please be advised that there is no Mr. Sears at the Federal Election Commission.

As the materials are pertinent to the function of this agency, we have kept copies for our records.

Sincerely,

William C. Oldaker
General Counsel

Enclosures



79040100489

Mrs. Barbara E. Wilson
318 West 1st Street
Tampa, Florida 33601

Dear Mrs. Wilson:

Enclosed please find the materials which you sent
to the attention of a Mr. Moore at the Federal Election
Commission.

Please be advised that there is no Mr. Moore at
the Federal Election Commission.

As the materials are pertinent to the function of
this agency, we have kept copies for our records.

Sincerely,

William J. Cramer
Special Counsel

Enclosure

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Taxpayers Allied for Good Government }

MUR 490 (78)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on February 15, 1978, the Commission meeting in an Executive Session at which a quorum was present, agreed without objection to direct the Office of the General Counsel to return to Mrs. Barbara Wiseman the materials referred to in the First General Counsel's Report on the above-captioned matter, which report was first circulated to the Commission on a no-objection basis, and to which an objection was filed.


Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

79040100490



FEDERAL ELECTION COMMISSION

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

February 6, 1978

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS

SUBJECT: MUR 490 (78) - 1st General Course's Report

The above-mentioned document was circulated on
February 3, 1978 at 11:30.

Commissioner Tiernan submitted an objection at 10:45,
February 6, 1978.

MUR 490 (78) has been placed on the Executive Session
Agenda for February 8, 1978.



February 1, 1978

MEMORANDUM TO: Major General
FROM: William T. GALT
SUBJECT: MUR 490

Please have the attached Day Report on MUR 490
distributed to the Commission on a 24-hour no-objection
basis.

Thank you.

79040100402

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

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION _____

MUR NO. 490(78)
DATE COMPLAINT RECEIVED
BY OGC _____

ATTORNEY Federman

COMPLAINANT'S NAME: Internally Generated

RESPONDENT'S NAME: Taxpayers Allied for Good Government

RELEVANT STATUTE: 2 U.S.C. § 433

INTERNAL REPORTS CHECKED: Public Records

FEDERAL AGENCIES CHECKED: N/A

SUMMARY OF ALLEGATIONS

This matter came to the attention of the Office of General Counsel through a memorandum from the Deputy Staff Director in which it was alleged that one John Sears was attempting to form a number of committees for the common purpose of funneling contributions to certain Federal candidates. * This activity might constitute violations of several sections of the Act including 2 U.S.C. § 433(b)(2) for failure to disclose affiliated and/or connected organizations.

Attached to the memorandum was a packet of materials from the Taxpayers Allied for Good Government.* This packet contained an unsigned registration statement, two checks made payable to the committee, a memo with instructions on how to fill out the registration materials, and a note from a Mrs. Barbara Wiseman (proposed treasurer of the committee) to a

*Attached for reference

Mr. Sears stating that she did not wish to be the committee's treasurer. Apparently Mrs. Wiseman received the packet of materials from Mr. Sears, then wrote the note declining to be the treasurer of the committee and mistakenly forwarded the packet to the attention of Mr. Sears at the Federal Election Commission.

The registration statement is incomplete and erroneous. It is incomplete in that it is unsigned and lines 5,6,8,9,14, and 15 are blank. It is erroneous in that Mrs. Wiseman's name is listed as the committee's treasurer, when she in fact declined that position. Given these facts, it seems that the registration statement of Taxpayers Allied for Good Government should be removed from the public record.

During the period from January 5 to January 15, 1978, four other similar committees registered with the Commission. ^{1/}

The similarities among the committees' registration statements are as follows:

- a. Similar names.
- b. Date listed on Line 3 identical - December 26, 1977.
- c. Statement of identification number on Line 2 identical - "not assigned".
- d. Duration of committee given on Line 13 identical - "indefinite existence".
- e. Lines 5,6,8,9, & 15 are blank on all the forms.
- f. All were filed at approximately the same time.

In addition, one of the checks made payable to Taxpayers Allied for Good Government was signed by the treasurer of the Concerned Pennsylvania Taxpayers Committee.

1/

Taxpayers for Better Government
Concerned Pennsylvania Taxpayers Committee
Concerned Taxpayers for Better Government
New Jersey Citizens for Republican Government

Disclosure Division has sent Requests for Additional Information to the committees asking each to state the names, if any, of any affiliated or connected organizations. The division is currently awaiting the committees' responses to those requests.

RECOMMENDATION

Await responses of the committees to the Requests for Additional Information. Send attached letter and return materials to Mrs. Barbara Wiseman. Remove registration materials of Taxpayers Allied for Good Government from the public record.

79040100495



FEDERAL ELECTION COMMISSION

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

MEMORANDUM

TO: BILL OLDAKER
FROM: BILL LOUGHREY *BL*
RE: JOHN SEARS' FUNDRAISING
DATE: JANUARY 10, 1978

The attached materials are part of an apparent effort by John Sears to set up political action committees throughout the country. The purpose of these PACs appears to be to act as funnels or conduits for funds for conservative contributors. Basically, the scheme apparently works as follows:

- A. Several committees are set up throughout the country;
- B. Donors are instructed to contribute up to \$5,000 to each of several of these committees in amounts totaling up to \$25,000;
- C. These committees in turn are instructed to contribute to particular candidates, either through a newsletter or verbal instruction.


The attached instructions include an already completed FEC Form 1. The following possible violations may be involved:

1. The Committee does not disclose its affiliates on line 6 of Form 1;
2. These committees may not be registering on time;
3. There may be a failure to disclose earmarked contributions pursuant to 2 U.S.C. 441a(a)(8).

I suggest that a researcher examine whether there are other similar committees and that Steve Mims' group be instructed to watch for similar registrations. There appears to be several distinguishing answers on these statements of organizations. For example, Question 2 is answered as "not assigned"; Question 13 is answered as "the committee has no plans to dissolve"; and several of the other lines are left blank. I am referring this to your attention for consideration as a Matter Under Review. I suggest that you may wish to send the checks and attached note back to Barbara H. Wiseman by registered mail.

79040100497

ANTHONY W. GRAY HELEN H. GRAY 644 RIDGEFIELD AVENUE PITTSBURGH, PA. 15216		1596
<small>PAY TO THE ORDER OF</small> <i>Taxpayers Allied for Good Government - P.H.C. 3</i>		<i>12/26 1977</i>
<i>One hundred and no/100</i>		<i>100</i>
		DOLLARS
<small>48 ALLEGHENY CENTER OFFICE</small> PITTSBURGH NATIONAL BANK <small>PITTSBURGH, PENNSYLVANIA</small>		
<small>MEMO</small>		<i>Helen H. Gray</i>
⑆0430⑉0009⑆ 1596⑈ 4 512839⑈		

ARNOLD S. ROLAND, M.D. 306 WALNUT, SUITE 38 SAN DIEGO, CALIF. 92103		199
<small>PAY TO THE ORDER OF</small> <i>Taxpayers Allied for Good Government</i>		<i>Dec 23 1977</i>
<i>Two Hundred Fifty and no/100</i>		<i>250</i>
		DOLLARS
 PARK WEST OFFICE 540 Laurel Street San Diego, CA 92101		<i>Arnold S. Roland</i>
<small>MEMO</small>		
⑆1222⑉0052⑆ 020201401⑈ 199		

MRS. WILLIAM F. WISEMAN
318 BIRD KEY DRIVE
SARASOTA, FLORIDA 33677

Jan. 3, 1978

Dear Mr. Sears,

Due to a misunderstanding
as to what this situation entails for me,
I am returning the material from your
office. It is impossible for me to
undertake this task at this time, and
I am assured that you can easily find
someone who is willing and diligent.
Good luck. Sincerely,

Barbara H. Wiseman

70040100498

MEMO TO PAC TREASURERS

Enclosed please find:

- 1) FEC form #1, "Statement of Organization for a Political Action Committee", and
- 2) Checks representing contributions to your PAC.

In order to comply with the Federal Election Campaign Act Amendments, it is necessary for you, as Treasurer, to do the following:

- 1) Open a new checking account at a local bank under the name of your PAC with you as Treasurer being the person authorized to sign checks for the PAC and deposit the contribution checks to the new account;
- 2) Enter the name and account number of the bank on page 3, #14 of FEC form #1.
- 3) Sign and date the form, page 3, bottom.
- 4) Mail the form to:
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

79040100499



FEDERAL ELECTION COMMISSION

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

Mrs. Barbara H. Wiseman
318 Bird Key Drive
Sarasota, Florida 33577

Dear Mrs. Wiseman,

Enclosed please find the materials which you sent to the attention of a Mr. Sears at the Federal Election Commission.

Please be advised that there is no Mr. Sears at the Federal Election Commission.

As the materials are pertinent to the function of this agency, we have kept copies for our records.

Sincerely,

William C. Oldaker
General Counsel

Enclosures



79040100500



FEDERAL ELECTION COMMISSION

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

MEMORANDUM

TO: BILL OLDAKER
FROM: BILL LOUGHREY ^{BL}
RE: JOHN SEARS' FUNDRAISING
DATE: JANUARY 10, 1978

The attached materials are part of an apparent effort by John Sears to set up political action committees throughout the country. The purpose of these PACs appears to be to act as funnels or conduits for funds for conservative contributors. Basically, the scheme apparently works as follows:

- A. Several committees are set up throughout the country;
- B. Donors are instructed to contribute up to \$5,000 to each of several of these committees in amounts totaling up to \$25,000;
- C. These committees in turn are instructed to contribute to particular candidates, either through a newsletter or verbal instruction.

The attached instructions include an already completed FEC Form 1. The following possible violations may be involved:

1. The Committee does not disclose its affiliates on line 6 of Form 1;
2. These committees may not be registering on time;
3. There may be a failure to disclose earmarked contributions pursuant to 2 U.S.C. 441a(a)(8).

I suggest that a researcher examine whether there are other similar committees and that Steve Mims' group be instructed to watch for similar registrations. There appears to be several distinguishing answers on these statements of organizations. For example, Question 2 is answered as "not assigned"; Question 13 is answered as "the committee has no plans to dissolve"; and several of the other lines are left blank. I am referring this to your attention for consideration as a Matter Under Review. I suggest that you may wish to send the checks and attached note back to Barbara H. Wiseman by registered mail.

79040100501

MUR 490782 #57

MRS. WILLIAM P. GREGGIAN
318 BIRD KEY DRIVE
SARASOTA, FLORIDA 34277

Jan. 3, 1978

Dear Mr. Sears,

Due to a misunderstanding
as to what this situation entails for me,
I am returning the material from your
office. It is impossible for me to
undertake this task at this time, but
I am assured that you can easily find
someone who is willing and diligent.

Good luck.

Sincerely,

Barbara H. Wiseman

790405

ARNOLD S. ROLAND, M.D.

306 WALNUT, SUITE 38
SAN DIEGO, CALIF. 92104

199

PAY TO THE
ORDER OF

Payee Allied for Good Government \$250.00
Two Hundred Fifty and 00/100

DOLLARS



PARK WEST OFFICE
540 Laurel Street
San Diego, CA 92101

Arnold S. Roland

MEMO

⑆1222⑆0052⑆ 02020401⑆ 199

ANTHONY W. GRAY
HELEN H. GRAY
664 RIDGEFIELD AVENUE
PITTSBURGH, PA. 15216

1596

PAY TO THE
ORDER OF

Payee Allied for Good Government - PAC \$100.00
One hundred and 00/100

DOLLARS



45 ALLEGHENY CENTER OFFICE
PITTSBURGH NATIONAL BANK
PITTSBURGH, PENNSYLVANIA

Helen H. Gray

MEMO

⑆0430⑆0009⑆ 1596⑆ 4 512839⑆

200113

MEMO TO PAC TREASURERS

Enclosed please find:

- 1) FEC form #1, "Statement of Organization for a Political Action Committee", and
- 2) Checks representing contributions to your PAC.

In order to comply with the Federal Election Campaign Act Amendments, it is necessary for you, as Treasurer, to do the following:

- 1) Open a new checking account at a local bank under the name of your PAC with you as Treasurer being the person authorized to sign checks for the PAC and deposit the contribution checks to the new account;
- 2) Enter the name and account number of the bank on page 3, #14 of FEC form #1.
- 3) Sign and date the form, page 3, bottom.
- 4) Mail the form to:
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

79040100504

Statement of Organization For a Political Committee

Supporting any candidate(s) for federal office and anticipating contributions or expenditures in excess of \$1,000 in any calendar year in support of such candidate(s).

(See Reverse Side For Instructions.)

RECEIVED
FEDERAL ELECTION
COMMISSION

JAN 3 PM 12:20

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1(a) Name of Committee (in full) ☐ Check if name or address is changed

Taxpayers Allied for Good Government

2 Identification Number

Not Assigned

(b) Address (number and street)

318 Bird Key Drive

3 Date

Dec. 26, 1977

(c) City, State and ZIP code

Sarasota, Fla.

4 Is this an amended statement ☐ Yes ☒ No
If "YES" FILL IN ONLY THOSE LINES ON WHICH THERE HAS BEEN A CHANGE

5 Check one:

☐ (a) This committee has been designated as the principal campaign committee for _____

(Name of Candidate)

a candidate for _____ in the _____ Election
(Federal office sought) (Year of election)

to be held in the State of _____
(State in which election is held)

(THE PRINCIPAL CAMPAIGN COMMITTEE WILL FORWARD TO THE COMMISSION A COPY OF THE STATEMENT OF ORGANIZATION FOR EACH AFFILIATED COMMITTEE REQUIRED TO FILE WITH IT.)

☐ (b) This committee is supporting only one candidate, and is authorized by _____

(Name of Candidate)

to receive contributions and make expenditures with respect to the _____ Election(s)
(General, Primary, Runoff, etc)

held in _____, and will file all reports and statements with the candidate's principal campaign
(Year of election in State)

committee, _____
(Full name of principal campaign committee)

(ATTACH A COPY OF CANDIDATE'S WRITTEN AUTHORIZATION.) (FEC FORM 2a)

☐ (c) This committee supports only one candidate _____ but is not an authorized committee.
(Name of Candidate)

☐ (d) This committee supports more than one Federal candidate and is not a party committee.

☐ (e) This committee is a _____ committee of the _____ Party.
(National, State, county, city) (Democratic, Republican, etc.)

6 Names of affiliated end/or connected organizations

Mailing address and ZIP code

Relationship

If the registering political committee has identified a "connected organization" above, please indicate type of organization:

☐ Corporation ☐ Labor organization ☐ Membership organization ☐ Trade association ☐ Cooperative
☐ Corporation without capital stock ☐ Other (please specify)

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

Statement of Organization of a Committee

(Page 2)

Name of Committee

Taxpayers Allied for Good Government

7 Area, Scope and Jurisdiction of Committee:

- (a) Will this committee operate in more than one State? ☒ Yes ☐ No
(b) Will it operate on a statewide basis in one State? ☐ Yes ☒ No
(c) Will it primarily support candidates seeking State or local office? ☐ Yes ☒ No
(d) Will it support or does it anticipate supporting directly or indirectly, candidates for Federal office in excess of \$1,000 in a calendar year? ☒ Yes ☐ No

8 (a) List by name, address, office sought, and party affiliation, any candidate for Federal office that this committee is supporting:

Full name(s) of candidate(s)	Mailing address and ZIP code	Office sought	Party

(b) List by name, address, office sought, and party affiliation, any candidate(s) for any other public office(s) that this committee is supporting (unless the committee is supporting the entire ticket of a party as indicated in line 9)

Full name(s) of candidate(s)	Mailing address and ZIP code	Office sought	Party

9 If this committee is supporting the entire ticket of a party, give name of party ►

10 Identify by name, address and position, the person in possession of committee books and records:

Full name	Mailing address and ZIP code	Title or position
Barbara Wiseman	318 Bird Key Drive Sarasota, Florida	Treasurer

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

Statement of Organization of a Committee

(Page 3)

Name of Committee

Taxpayers Allied for Good Government

11 List by name, address and position, other principal officers of the committee (include chairman, treasurer, secretary, assistant treasurer, assistant secretary, members of finance committee)

Full name	Mailing address and ZIP code	Title or position
James Hebert	1816 Rice Blvd, Houston, Texas 77006	Chairman
Barbara Wiseman	318 Bird Key Drive Sarasota, Fla.	Treasurer

12 Does this committee plan to stay in existence beyond the current calendar year? ☒ Yes ☐ No
If "Yes" for how long? ☐ Indefinite

13 In the event of dissolution, what disposition will be made of residual funds?
The Committee has no plans to dissolve

14 List all banks or other repositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds:

Name of bank, repository, etc.	Mailing address and ZIP code

15 List all election reports required to be filed by this committee with States and local jurisdictions, together with the names, addresses, and positions of the recipients of the reports (other than reports filed with Secretaries of State pursuant to USC 439(a)):

Report title	Dates required	Name and position of recipient	Mailing address and ZIP code

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

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

(Signature of Treasurer)

(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 or § 441j (see instructions)

For further
information
contact:

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

RECEIVED
FEDERAL ELECTION
COMMISSION

10 JAN 3 AM 11:47

Attention: Mr. Sears

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



MEMORANDUM

TO: BILL OLDAKER
FROM: BILL LOUGHREY
RE: JOHN SEARS' FUNDRAISING
DATE: JANUARY 7, 1978

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FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR #

490

Date Filmed

2/8/79

Camera No. ---- 2

Cameraman

BPC

7904010051