



FEDERAL ELECTION COMMISSION

1155 K STREET, N.W.
WASHINGTON, D.C. 20461

THIS IS THE END OF TUE #

701

Date Filmed 1/25/79 Camera No. --- 2

Cameraman BPC

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Aguilar

MUR 701(78)

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
Thomas H. Borman
5814 Excelsior Blvd.
Minneapolis, MN 55416

3. ARTICLE DESCRIPTION
REGISTERED NO. CERTIFIED NO. INSURED NO.
943992

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
11-10-78

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE

CLERK'S INITIALS

POSTMARK
8/11
10

GPO 1977 O-249595

Aguilar

MUR 701(78)

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
Joseph T. Dixon, Treasurer
1200 T.H.E. Ins. Bldg.
Minneapolis, MN 55401

3. ARTICLE DESCRIPTION
REGISTERED NO. CERTIFIED NO. INSURED NO.
943993

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☒ Addressee ☐ Authorized agent
Joseph T. Dixon

4. DATE OF DELIVERY
11/10/78

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE

CLERK'S INITIALS

POSTMARK
11/10/78

☆GPO 1977 O-249595



FEDERAL ELECTION COMMISSION

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

November 6, 1978

Miss LaVonne Samstad
7340 York Avenue South
Apt. 6-210
Edina, MN 55435

Re: MUR 701(78)

Dear Ms. Samstad:

On November 6, 1978, the Commission found no reasonable cause to believe that the Freeman Volunteer Committee and the Third District DFL Congressional Fund violated the Federal Election Campaign Act of 1971, as amended.

The Commission's inquiry of this matter revealed the fact that the Third District DFL Congressional Fund is a subordinate political committee of the Dollars for Democrats, a qualified multicandidate committee. Therefore, the Fund is not subject to the \$1000 limitation of 2 U.S.C. §441a(a) (1)(A). Accordingly, the Commission intends to close its file on this matter. A copy of the General Counsel's Report is enclosed for your information.

If further information comes to your attention which you believe establishes a violation of the Federal Election Campaign Act of 1971, as amended, please contact me.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "W. C. Oldaker", is written over the typed name.

William C. Oldaker
General Counsel

Enclosure

General Counsel's Report



FEDERAL ELECTION COMMISSION

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

November 6, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Joseph T. Dixon, Treasurer
Third District DFL Congressional
Fund
1200 Title Insurance Building
Minneapolis, MN 55401

Re: MUR 701(78)

Dear Mr. Dixon:

This is to advise you that on November 6, 1978, the Commission voted to close the file on the matter referred to above.

The Commission found no reasonable cause to believe that you violated 2 U.S.C. §441a(a)(1)(A) in connection with your \$2150 contribution to the Freeman Volunteer Committee. A copy of the General Counsel's Report is enclosed for your information.

Should you have any questions, please contact Miriam Aguiar at 202-523-4529.

Sincerely yours,

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

William C. Oldaker
General Counsel

Enclosure

General Counsel's Report



FEDERAL ELECTION COMMISSION

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

November 6, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Thomas H. Borman
Treasurer, Freeman Volunteer
Committee
5814 Excelsior Boulevard
Minneapolis, MN 55416

Re: MUR 701(78)

Dear Mr. Borman:

This is to advise you that on November 6, 1978 the Commission voted to close the file on the matter referred to above.

The Commission found no reasonable cause to believe that you violated 2 U.S.C. §441a(f) and 11 CFR §110.9(a) in connection with your acceptance of the \$2150 in contributions from the Third District DFL Congressional Fund. A copy of the General Counsel's Report is enclosed for your information.

Should you have any questions, please contact Miriam Aguiar at 202-623-4529.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "William C. Oldaker", is written over the typed name.

William C. Oldaker
General Counsel

Enclosure

General Counsel's Report



FEDERAL ELECTION COMMISSION

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

P. 266

NOVEMBER 3, 1978

TO: WILLIAM C. OLDAKER
ATTENTION: MARIAN AGUIAR

THROUGH: ORLANDO B. POTTER

FROM: TOM HASELHORST

RE: MUR 701

79040092020

The attached response to MUR 701, received by the RAD Party Section on November 3, had been stapled to the back of the Third District DFL Congressional Fund's 10 Day Pre-Election Report. As it appeared that the response had been microfilmed, a request was made to Reports Processing to remove the appropriate frames from the public record. The amended Statement of Organization appears to be part of the response and, as such, is being forwarded without being processed.

Joseph T. Dixon, Jr.
1200 Title Insurance Building
Minneapolis, Minnesota 55401

RECEIVED
FEDERAL ELECTION
COMMISSION

78 NOV 2 PM 4:44

November 1, 1978

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

Re: Third District DFL Congressional Fund
(FEC#00002113) Pre-November 7, 1978
General Election Report

Gentlemen:

Enclosed please find the Pre-General Election Report covering the period 10-1-78 through 10-31-78, FEC Form 3 and supporting forms. Also enclosed and hereby filed please find and Amended Statement of Organization whereby the above-captioned committee registers and qualifies as a multi-candidate committee.

I would also take this opportunity to address two other points:

1. The legal basis for making the additional \$1,750 contribution to the Freeman Volunteer Committee disclosed in the enclosed Report; and
2. The reasons why this filing is late and why no action should be taken against me.

For purposes of overall clarity I will address these two issues in order.

1. As the Commission's records will reflect, I received a complaint (MUR 701) dated September 25, 1978 con-

cerning prior contributions to the Freeman Campaign Committee in the amount of \$2150. The basis for the complaint was the apparent violation of the \$1,000 per election limitation on political committees to candidates for federal election. By letter dated October 10, 1978, I provided the Commission an extensive response to MUR 701 explaining why, in my view, the prior contributions had not been in violation of federal law and requesting its advice on a number of points, any one of which, I believe would make it clear that additional contributions could be made to the Freeman Volunteer Committee. Since that time I have had telephone conversations on October 20 and October 31 with Miriam Aguiar, David Fisk and Gary Lipkin of the FEC attempting to get from them definitive answers to the questions contained in my letter of October 10 so that the Third District DFL Congressional Fund might act in advance of the general election. Despite what I am sure were their best efforts, and partially because of Miriam Aguiar's sudden family emergency which required her to leave Washington, I have not been able to receive any definitive guidance on the issues involved. Because of that inability to obtain needed advice, and because of what was perceived as an urgent need for action by the Third District DFL in advance of the general election, we have made an additional contribution to the Freeman campaign in the amount of \$1750 as disclosed in these reports. The following are the two basis under which I believe the contribution to be legal:

A. As disclosed in the enclosed Amended Statement of Organization, the Third District DFL Congressional Fund has met all the requirements for a multi-candidate committee. We have been registered as a political committee with the Commission for more than six months, we have made contributions, as shown on the enclosed Pre-General Election Report, to five candidates for federal election, and we have received contributions from more than 50 contributors. As a multi-candidate committee, the Third District DFL Congressional Fund is entitled to make contributions of up to \$5,000 per candidate per election.

B. The Third District DFL Congressional Fund may be, and probably is, an affiliated committee of the state DFL (Minnesota Dollars for Democrats) which is

itself a multi-candidate committee. As an affiliated committee of this multi-candidate committee the "Fund" is included within the overall \$5,000 contribution limitation applicable.

Further, I have obtained written authorization from the state party committee to make the contribution reported herein and have been advised by the Freeman Volunteer Committee that by making such a contribution it will not cause the Freeman Volunteer Committee to have received more than \$5,000 from the state party committee and all known affiliated committees of the state party committee. Copies of this correspondence are attached.

We believe that under either of the above rationales, the contribution disclosed herein is legal and that we have exercised our best efforts to assure full compliance with all requirements of the FEC.

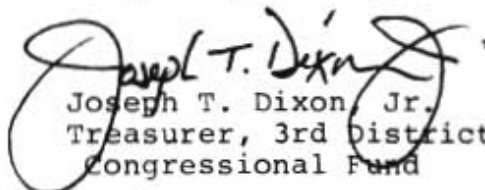
2. With respect to the late filing, I would ask that no action be taken because I have been awaiting word from the Commission staff with respect to the questions raised in my October 10 letter. On October 20, I was advised by Miriam Aguiar that I might expect to hear from her with respect to those questions, and the actions discussed above, sometime during the week of October 23. Further, she advised me that she would give me a telephone call after a final determination had been made, but before any formal written letter was actually mailed. Further, I telephoned Ms. Aguiar on October 27 and was advised that she was out of the office at that time and would return the call on Monday. It was not until Tuesday, October 31, 1978 that I was telephoned by Gary Lipkin and advised that Ms. Aguiar had been called out of the city because of a family emergency and that no determination as of yet had been made with respect to my October 10 letter. I now appreciate that perhaps I should have filed the report when I failed to reach Ms. Aguiar on Friday, October 27. However, inasmuch as I anticipated making the contributions discussed herein I desired to hold off on filing the report in order to make the entire document self-contained.

If I can be of further assistance or provide the Commission with additional information please let me know. I

Federal Election Commission
November 1, 1978
Page Four

can only say that I have spent a substantial amount of time and effort attempting to comply fully with the statutes and regulations involved in the administration of the FEC and believe that I have demonstrated both good faith and full compliance with the law.

Very truly yours,


Joseph T. Dixon, Jr.
Treasurer, 3rd District DFL
Congressional Fund

JTD:jms
Enclosures
cc: Mr. Gary Lipkin, FEC
Mr. Tom Borman, Treasurer,
Freeman Volunteer Committee

Michael Freeman

Democrat

5814 Excelsior Boulevard
St. Louis Park, Minnesota 55416
Phone: 612/927-8458

October 30, 1978

Dear Joe:

This letter is in confirmation of our recent phone conversation. Rest assured that we have not raised \$5,000 from DFL affiliated organizations since the September 12, primary election. Even if the Third District DFL should give us a full \$1,800, we would not exceed \$5,000.

Sincerely,


Tom Borman

DFL/Labor endorsed for Third District Congress



MINNESOTA
**DEMOCRATIC
FARMER LABOR
PARTY**

730 East 38th Street, Minneapolis, Minnesota 55407 (612) 827-5421

Rick Scott
Chair
Claire Rumpel
Associate Chair
Tom Mott
Secretary
David Lendoff
Treasurer

STATE CENTRAL COMMITTEE

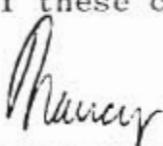
October 24, 1978

Joe Dixon
1200 Title Insurance Bldg
Minneapolis, MN 55401

Dear Joe,

If in fact the 3rd District DFL is an affiliated committee of the Minnesota Dollars for Democrats, the 3rd District should be allowed to contribute up to \$1800.00 to the Freeman for Congress Volunteer Committee.

To the best of my knowledge, the party committees of Minnesota have not exceeded \$3200.00 of the \$5000.00 limit we are bound by if these committees are affiliates of the State Party.


Nancy Wirth
DFL Finance Director

opeiu:12

Statement of Organization For a Committee

(Page 2)

Name of Committee

Third District DFL Congressional Fund

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
Michael O. Freeman	5814 Excelsior Blvd. Minneapolis, MN 55416	U.S. House of Representatives	DFL
Martin O. Sabo	2007 S. Lyndale Minneapolis, MN 55405	U.S. House of Representatives	DFL
Gerry Sikorski	222 North Concord So. St. Paul, MN 55075	U.S. House of Representatives	DFL
John Considine	Box 1065 Mankato, MN 56001	U.S. House of Representatives	DFL
Wendell R. Anderson	Box 550 Minneapolis, MN 55440	U.S. Senate	DFL

(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 ►

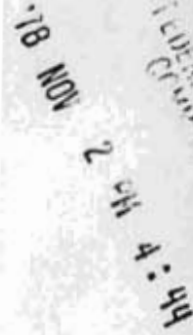
10 Identify by name, address and position, the person in possession of committee books and records:

Full name	Mailing address and ZIP code	Title or position

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

MEAPOLIS, MINNESOTA 55401

1000



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Third District Democratic-) MUR 701 (78)
Farner-Labor (DFL))

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on November 6, 1978, the Commission determined by a vote of 5-0 to approve the following recommendations, as set forth in the General Counsel's Report dated November 5, 1978, regarding the above-captioned matter:

1. Find no reasonable cause to believe that respondents, the Freeman Volunteer Committee and the Third District DFL Congressional Fund violated the Act.
2. Close the file and send the letters attached to the above-named report.

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

11/6/78

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Report received in Office of Commission Secretary: 11-6-78, nightdrop
Circulated on an expedited basis: 11-6-78, 9:00

BEFORE THE FEDERAL ELECTION COMMISSION
November 5, 1978

In the Matter of)
Freeman Volunteer Committee) MUR 701 (78)
Third District Democratic-Farmer-)
Labor (DFL) Congressional Fund)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On 21 September 1978, the Commission found reason to believe that the Third District DFL Congressional Fund ("Fund") was in violation of 2 U.S.C. §441a(a)(1)(A) and reason to believe that the Freeman Volunteer Committee ("Committee") was in violation of 2 U.S.C. §441a(f) and 11 C.F.R. §110.9(a). Commission records disclosed that the Fund contributed \$2150 to the Committee for the primary election and had not registered as a multicandidate committee under §441a(a)(4). Therefore, the Fund was apparently subject to the \$1,000 limit of §441a(a)(1)(A).

On 13 October 1978, the Commission received a joint response from Mr. Thomas Borman, treasurer for the Committee and Mr. Joseph Dixon, treasurer for the Fund. (See Attachment I). Respondents stated that the Fund was a subordinate political committee 1/ of the Minnesota DFL Party ("Party"). The Party

1/ It is noted that Commission records fail to disclose any previous statement of organization which may have been filed by the Fund to verify this allegation. Therefore prior to the filing by the Fund of its amended statement of organization, we were unable to determine whether the Fund was in fact a subordinate party related committee.

operates its federal activities as the "Dollars for Democrats," ("DFD") a properly registered multicandidate committee and the Party's sole source for expenditures on behalf of federal candidates. While noting that the Fund has been in existence for more than 6 months, received contributions from more than 50 contributors and contributed to four federal candidates since 1974, Mr. Dixon stated that he has been unable to locate the Fund's original statement of organization and enclosed a copy of the Fund's amended statement of organization filed with the Commission on 10 October 1978. (Attachment II)

II. ANALYSIS

To qualify as a multicandidate committee under 2 U.S.C. §441a(a)(4) a political committee must be registered for 6 months or more, receive contributions from more than 50 persons and, except for state party committees, contribute to five or more candidates. The Fund has amended its statement of organization to identify itself as a subordinate political party committee of DFD, the federal arm of the Minnesota State DFL Party.^{2/} As previously mentioned, the DFD is registered as a qualified multicandidate committee and subject to a \$5,000 contribution limitation.

As the Fund falls within the state party exception of §441a(a)(4) and has satisfied the other requirements of that section, it appears that the Fund is not subject to the \$1,000 limitation of §441a(a)(1)(A). As a subordinate state party committee, all


^{2/} Prior to the filing of the complaint which generated this matter, the Fund's reports disclose that they received financing from the DFD. 11 C.F.R. §110.3(b)(2)(ii).

contributions made by the Fund are part of the DFD's \$5,000 aggregate contribution limitation per candidate per election. This limitation has not been exceeded.

III. RECOMMENDATION

1. Find no reasonable cause to believe that respondents, the Freeman Volunteer Committee and the Third District DFL Congressional Fund violated the Act.
2. Close the file and send the attached letters.

11/5/78
Date


William C. Olsaker
General Counsel

ATTACHMENTS

1. Letter from Respondents
2. Statement of Organization
3. Letters to Respondents
4. Letter to Complainant

70340092034

CCC#
5142

FEDERAL ELECTION
COMMISSION

OCT 13 AM 9:17

October 10, 1978

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

806891

Re: MUR 701

Dear Mr. Oldaker:

We are writing to you in response to your letters dated September 25, 1978 in which you advised that the Federal Election Commission ("Commission") had received a complaint which alleged violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). In those letters you further advised that the Commission has reason to believe that the matters alleged in the complaint state a violation of 2 U.S.C. §441a(a)(1)(A) in that it appears that the Third District DFL, prior to the September 12, 1978 primary election, contributed more than \$1,000 to the Freeman Volunteer Committee ("Committee"). You indicated in that letter that the Commission's records disclosed that the Third District DFL Party, subsequently and hereinafter the Third District DFL Congressional Fund ("Fund"), is a party related committee which is not qualified as a multi-candidate committee under 2 U.S.C. §441a(a)(4), and is therefore limited to total aggregate contributions of \$1,000 to any candidate or his authorized political committees "with respect to any election for federal office".

Inasmuch as the complaint involved a single series of contributions which allegedly caused violations of the Act by both the Fund and the Committee we felt this joint response by the Fund and the Committee would best facilitate an understanding and resolution of the issues involved.

Since the Third District DFL Party and its federal reporting arm, the Fund, and the Committee as well as ourselves personally, have been strong supporters of the dis-

Mr. William C. Oldaker
October 10, 1978
Page Two

closure requirements and political funding control exemplified in the Commission, we take this complaint most seriously and wish to respond in substantial detail. For purposes of clarity we will break our response to three sections:

1. Factual Discussion;
2. Reasons Why the Contributions by the Fund to the Committee Were Proper and Lawful; and
3. Reasons Why No Action Should be Taken in the Event That the Commission Finds Violations of the Act.

1. FACTUAL DISCUSSION.

The Third District DFL Congressional Fund is the federal reporting committee of the Third District DFL Committee (FEC #C00002113). The Fund is a subordinate political party committee of the Minnesota State DFL Party. The Minnesota State DFL Party operates its federal activities under the committee name "Dollars for Democrats". Dollars for Democrats is a properly registered multi-candidate State party committee.

The Committee is the principal campaign committee of Michael O. Freeman a DFL candidate for the United States House of Representatives from Minnesota's 3rd Congressional District. Its FEC identification number is 071200.

The Fund has been in existence for more than six months, is a political party committee and has received contributions from more than 50 contributors, but has not since March 26, 1976 (the date upon which the undersigned assumed the treasurer'ship) contributed to five or more federal candidates. It has however made contributions to the Freeman Volunteer Committee (1978), the Coughlin Volunteer Committee (1976), the Robert Riggs for Congress Committee (1974), and the Mondale for Senate Committee (1974), all of which represented contributions to federal candidates. Further, the undersigned treasurer of the Fund has not been able to locate the Fund's original Statement of Organization in the records provided to him and therefore cannot challenge the Commission's assertion that the Fund is not independently registered as a multi-candidate committee.¹

¹ To remedy potential difficulties caused by this lack of records, the Fund has filed an amended Statement of Organization under separate cover, a copy of which is attached as Exhibit A.

Mr. William C. Oldaker
October 10, 1978
Page Three

The Fund has made the following contributions to the Freeman Volunteer Committee:

<u>Date</u>	<u>Check No.</u> ²	<u>Amount</u>
4/6/78	137	\$ 150.00
6/28/78	152	1,000.00
8/15/78	155	<u>1,000.00</u>
	Total	\$2,150.00

These contributions were fully disclosed by the Fund and by the Committee in their respective second quarter and pre-primary election Reports to the Commission.

2. REASONS WHY THE CONTRIBUTIONS BY THE FUND TO THE COMMITTEE WERE PROPER AND LAWFUL.

We believe that the contributions disclosed above were not in violation of the Act because the Fund, as a subordinate committee of a State party committee, is included within and governed by the contribution limitation applicable to the State party committee.

In this case, the applicable State party committee, Dollars for Democrats, is a multi-candidate political committee whose contributions are governed by §441a(a)(2):

No multi-candidate political committee shall make contributions -

- (A) to any candidate and his authorized political committees with respect to any election for federal office which, in the aggregate, exceed \$5,000;

We believe the multi-candidate limitation is applicable here because of subparagraph (5) of §441a(a) which states:

"For purposes of the limitations provided by paragraph (1) and paragraph (2), all contributions made by political committees established or financed

Mr. William C. Oldaker
October 10, 1978
Page Four

or maintained or controlled by any corporation, labor organization, or any other person, including any parent, subsidiary, branch, division, department or local unit of such corporation, labor organization or any other person or by any other group of persons, shall be considered to have been made by a single political committee . . ."

Further, the regulations adopted by the Commission set forth the following guiding principle:

"All contributions made by the political committees established, financed, maintained, or controlled by a State Party Committee and by subordinate State Party Committees shall be presumed to be made by one political committee. 11 C.F.R. 110.3(b)(2)(ii)."

Additionally, it is our understanding that the Commission has determined that the Minnesota State DFL party committee and all of the many County Unit party committees and Congressional party committees are governed by this regulation and statute, and are considered as one committee for purposes of contribution limitations. While we further understand that the Dollars for Democrats Committee has taken issue with this interpretation, it nonetheless stands as the Commission's ruling. We have previously been advised by the State party committee that it and the Fund are so governed.

Therefore, unless the Commission determines that the Fund is not a subordinate committee of the State party committee (Dollars for Democrats), it is our view that the contributions involved here are governed by the \$5,000 multi-candidate limitation applicable to the Dollars for Democrats State party committee. The Committee did not receive for the primary election held September 12, 1978 more than \$5,000 in contributions from Dollars for Democrats, including the Fund and all other subordinate State party committees.

Mr. William C. Oldaker
October 10, 1978
Page Five

3. REASONS WHY NO ACTION SHOULD BE TAKEN IN THE EVENT THAT
THE COMMISSION FINDS VIOLATIONS OF THE ACT.

As has been discussed in Section 2 above, both the Fund and the Committee believe that the contributions discussed herein were proper and valid under the Act. However, in the event that the Commission finds that our understanding of the Act is not accurate, or for any other reason the contributions were in violation of the Act, we wish to make clear why no action should be taken and our willingness to take whatever steps are necessary to remedy this situation.

First of all, the violation, if any be found, was purely innocent and inadvertent. As was noted in your letter setting forth the complaint, the reports of both the Fund and the Committee clearly disclose the amount and nature of the contributions.

These contributions were made on the basis of the legal understanding of the Act as set forth in Section 2 hereof. Over the course of this election year, we have been working with the State party committee in attempting to comply with all FEC requirements. Attached as Exhibits C, D and E hereto are various communications which we received from the State party committee setting forth an interpretation of the Act which we believe is consistent with our understanding set forth in Section 2 above, and our response thereto. All of these actions were taken in the good-faith understanding that the Dollar for Democrats State party committee and all subordinates committees as addressed in these exhibits were governed by a single \$5,000 per candidate limitation for the primary election.

Secondly, both the Fund and the Committee stand ready, willing and able to take whatever remedial action may be called for by the Commission. To begin with, although we believe the contributions were proper and authorized by the Act, the Committee nonetheless returned to the Fund \$150, a xeroxed copy of which is attached as Exhibit F, which has been deposited in the Fund. This action reduces the total contributions made from the Fund to the Committee to \$2,000. It would be our intention if requested by the Commission to designate \$1,000 of the contribution for the primary election and \$1,000 to the general election, at least until such time as the Fund determines that it may legally contribute

Mr. William C. Oldaker
October 10, 1978
Page Six

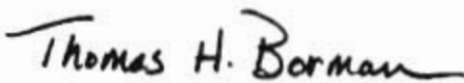
additional funds to the Committee. Further, should the Commission so desire, the Committee will return another \$1,000 to the Fund so that the total of the contributions received prior to September 12, 1978 would be \$1,000. Additionally, the Committee and the Fund will take whatever other steps are called for to come within strict compliance with the Act as finally determined by the Commission.

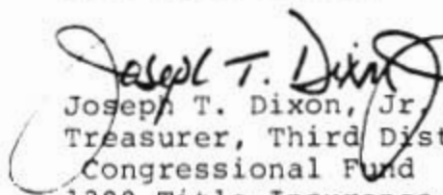
Before closing, the Fund would like to make known its desire, if possible, to contribute additional funds to the Committee toward the general election, either: 1) pursuant to its interpretation of the Act as set forth in Section 2 above and, with respect to the general election, as found in §441a(d)(1) of the Act; or 2) following registration of the Fund as a multi-candidate committee.

The Fund would request your earliest advice as to: 1) whether it may properly contribute additional sums to the Committee with respect to the general election as a subordinate committee of a multi-candidate State party committee, or 2) what steps must be taken in order to properly qualify the Fund as a multi-candidate committee. With respect to the latter question, the Fund believes that it has currently met all of the necessary qualifications for a multi-candidate committee with the exception of contributions to five or more federal candidates. We are unsure 1) whether, in light of 2 U.S.C. §441a(a)4 and 11 C.F.R. §100.14(a)(3)(iii), the Fund is exempt from the requirement of contributing to five or more federal candidates as a part of a State political party organization; 2) whether the Fund can consider contributions made in years other than 1978 to federal candidates towards the requirement of contributions to five or more federal candidates; and 3) whether any minimum contribution must be made in order to so qualify.

Should you have any further questions concerning this response to your letter of September 25, 1978, or to the inquiries made herein, please contact the undersigned at your earliest convenience.

Very truly yours,


Thomas H. Borman
Treasurer, Freeman Volunteer Committee
5814 Excelsior Boulevard
Minneapolis, Minnesota 55416
(612) 927-8548


Joseph T. Dixon, Jr.
Treasurer, Third District
Congressional Fund
1200 Title Insurance Building
Minneapolis, Minnesota 55401
(612) 339-2500

JTD:jms
Enclosures

THIRD DISTRICT D.F.L.
LEGISLATIVE FUND

152

PAY TO THE ORDER OF Freeman for Congress 6/28 1978 75-1660
One Thousand & 00/100 \$1,000.00
DOLLARS

Northwestern Southwest
Bloomington, Minnesota 55431
Northwestern National Bank Southwest

MEMO 1/2 6-27 Contribution Joseph T. Dixon

⑆0910⑆1660⑆97⑆83⑆339⑆ ⑈0000100000⑈

THIRD DISTRICT D.F.L.
LEGISLATIVE FUND

137

PAY TO THE ORDER OF Institutional Sales, Inc. 4/6 1978 75-1660
One Hundred fifty & 00/100 \$150.00
DOLLARS

Northwestern Southwest
Bloomington, Minnesota 55431
Northwestern National Bank Southwest

MEMO furniture - phone bank Joseph T. Dixon

⑆0910⑆1660⑆97⑆83⑆339⑆ ⑈0000015000⑈

THIRD DISTRICT D.F.L.
LEGISLATIVE FUND

155

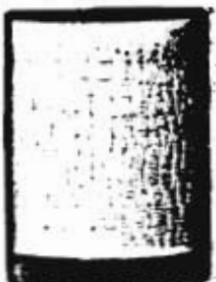
PAY TO THE ORDER OF Freeman for Congress 8/15 1978 75-1660
One Thousand & 00/100 \$1,000.00
DOLLARS

Northwestern Southwest
Bloomington, Minnesota 55431
Northwestern National Bank Southwest

MEMO Contribution Joseph T. Dixon

⑆0910⑆1660⑆97⑆83⑆339⑆ ⑈0000100000⑈

* This check was not originally intended as a contribution to the Committee. After the check was mistakenly endorsed and deposited into the Committee's account, it was mutually agreed to be a contribution and was so reported by the respective committees.



Freeman Vol. 6m

0055 09107

0031 65647

FOR PAY OR PAYEE
NORTHWESTERN NATL.
BANK OF MINNEAPOLIS
MINNEAPOLIS, MINNESOTA
17-1

FOR PAY OR PAYEE
NORTHWESTERN NATL.
BANK OF MINNEAPOLIS
MINNEAPOLIS, MINNESOTA
17-1

FOR PAY OR PAYEE
NORTHWESTERN NATL.
BANK OF MINNEAPOLIS
MINNEAPOLIS, MINNESOTA

4032478012 9897

JUN 30 78

APR 25 78

DEPOSIT
TELLER
23

Freeman Vol. 6m

Freeman Vol. 6m

AP '78' 25
PAY OR PAYEE
NORTHWESTERN NATL.
BANK OF MINNEAPOLIS
MINNEAPOLIS, MINNESOTA
17-1

AG '78' 24
PAY OR PAYEE
NORTHWESTERN NATL.
BANK OF MINNEAPOLIS
MINNEAPOLIS, MINNESOTA
17-1

24026001002



MINNESOTA
DEMOCRATIC
FARMER LABOR PARTY

730 East 38th Street, Minneapolis, Minnesota 55407 (612) 827-5421

STATE CENTRAL COMMITTEE

August 7, 1978

TO: County Unit Chairs, Associate Chairs, Treasurers
Congressional District Chairs, Associate Chairs, Treasurers
FR: Nancy White, DFL Finance Director

According to current Federal Election guidelines, the Minnesota Dollars for Democrats (the federally reporting committee of the DFL State Party) and all affiliated committees (which includes congressional districts and county units) are recognized as one committee for purposes of party expenditures to a Federal candidate. We are, therefore, limited to a maximum of \$5,000 per federal candidate per election.

The State office will file a consolidated report of expenditures to federal candidates (due again on September 2). Therefore, it is imperative that any money that has been given up until now or is given prior to this report due date to federal candidates, be reported to the State office. The information that is needed is the date that the money is expended, the committee from which the money is expended, and the federal committee to which the money goes.

Failure to report to us will result in an inaccurate report and a possible violation of expenditure limits.

Please don't hesitate to call me if you have any questions collect at 612-827-5421.

Thanks much for your cooperation.

opeiu:#12

cc: Federal level candidate committees

PLEASE RETURN IMMEDIATELY

QUESTIONNAIRE FOR COMMITTEES SPENDING
MONEY ON BEHALF OF FEDERAL CANDIDATES

Name of Committee THIRD DISTRICT DFL - FEDERAL COMMITTEE
Inauguration Name JOE DIXON Date 8/31/78 Phone 339-2500

#1.

☐ Yes, our committee has spent money on behalf of a federal candidate
(fundraiser, bulletins, brochures, etc.)

Our committee spent \$ _____ on (date) _____ on
behalf of _____ volunteer committee.

☒ No, our committee has not spent money on behalf of a federal candidate.

☐ Yes, our committee has accepted money from union treasuries and we have
spent or plan to spend on behalf of a federal candidate.

☒ No, our committee has not accepted money from union treasuries.

#3.

☒ Yes, our committee has spent \$1000 or more to help our federal candidates.

☐ No, our committee has not spent \$1000 or more to help our federal candidates.

Please keep your records concerning this questionnaire in your files for
future reference.

Thanks much.


opeiu:#17

Contributions to
Freeman for Congress Committee:

8/15/78	\$1,000
6/28/78	\$1,000
4/6/78	\$150
	<hr/>
	\$2,150

FREEMAN VOLUNTEER COMMITTEE

 NORTHWESTERN
NATIONAL BANK
OF MINNEAPOLIS

 Main Office
Seventh and Marquette
Minneapolis, MN 55480

1516

17-1
X 910

PAY

TO
THE
ORDER
OF

3rd District DFL

DATE

Oct. 3

AMOUNT

\$150.00

David A. Jones

⑈001516⑈ ⑆091000019⑆ 06⑈72⑈34⑈ Co-director

7 9 0 4 0 0 9 : 0

Deposit to Acc. 91 83 339
Third District DE

5102600F064



AMENDED
Statement of Organization
For a Political Committee

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

(See Reverse Side For Instructions.)

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) <input type="checkbox"/> Check if name or address is changed Third District DFL Congressional Fund	2 Identification Number FCC #C00002113
(b) Address (number and street) 1200 Title Insurance Building	3 Date 10-9-78
(c) City, State and ZIP code Minneapolis, Minnesota 55401	4 Is this an amended statement <input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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
(General, Primary, Runoff, etc.)
held in _____, and will file all reports and statements with the candidate's principal campaign committee.
(Year of election in State)
(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 Congressional level Committee of the Minnesota DFL Party. ("Dollars for Democrats")
(National, State, county, city) (Democratic, Republican, etc.)

6 Name of affiliated and/or connected organizations	Mailing address and ZIP code	Relationship
Dollars for Democrats (federal fund of Minnesota State DFL Party)	730-38th Street Minneapolis, Minnesota 55407	Registrant is subordinate political party committee.

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) State Party Committee

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 sheets.

Statement of Organization For a Committee

(Page 2)

Name of Committee

Third District DFL Congressional Fund

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
Michael O. Freeman		U.S. House of Repres.	DFL
Wendell Anderson		U.S. Senate	DFL

8 (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 candidate is 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: Democratic Farmer Labor

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
Joseph T. Dixon, Jr.	1200 Title Ins. Bldg. Minneapolis, MN 55401	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 For a Committee

(Page 3)

Name of Committee
Third District DFL Congressional Fund

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
William Barbeau	4860 W. 39th St. #115 Minneapolis, MN 55416	Chair
Betty Pearson	8244 Park Avenue South Bloomington, MN 55420	Associate Chair
Terrill Anderson	7501 Elliot Avenue South Richfield, MN 55423	Secretary

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

13 In the event of dissolution, what disposition will be made of residual funds? Unknown and not anticipated

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

Name of bank, depository, etc.	Mailing address and ZIP code
First National Bank, South West Bank	7900 Xerxes Avenue South Bloomington, MN 55431

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 435(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 pages.

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

Joseph T. Dixon Jr., Treasurer
(Signature of Treasurer)

October 9, 1978

(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 § 441 (see instructions).

For further
information
contact:

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



MINNESOTA
DEMOCRATIC
FARMER-LABOR PARTY

730 East 54th Street, Minneapolis, Minnesota 55424 (612) 327-5421

STATE CENTRAL COMMITTEE

August 21, 1978

TO: COUNTY UNIT AND CONGRESSIONAL TREASURERS
FR: NANCY WIRTH, DFL FINANCE DIRECTOR
RE: FEDERAL ELECTION COMMISSIONS (FEC) REGULATIONS

The State DFL Party "Dollars for Democrats" committee has just finished an audit by the FEC. We have been advised on party spending limits on behalf of federal candidates and the role the State Party must play in coordinating these activities.

Basically, there are three main areas that the State Party must coordinate through your cooperation: (1) combined spending limits of \$5,000 per candidate for the primary election, (2) acceptance of union treasury donations and (3) requirements to file with the FEC if your committee has spent \$1000 for a federal candidate. In an attempt to simplify things, I'm enclosing a questionnaire for you to return to me immediately in the postage paid envelope. We must file a report with the FEC on September 2nd--hence the rush. We will follow up with a phone call if we have any questions. Thanks much for your help on this.

1. The first area deals with our limits regarding the primary election expenditures. Any money spent on behalf of a federal candidate this year up to September 12 is considered by the FEC to be primary election activity. The DFL Party (State, Congressional District and County Units combined) has a total spending limit of \$5000 per federal candidate on the primary. In other words, we as a combined Party can spend \$5000 on behalf of each of the two U.S. Senate candidates and \$5000 on behalf of each of our eight congressional candidates.

I sent you a memo on August 7 regarding money contributed directly from your committee to federal candidate's committee. We must now ask you if you've made any expenditures on behalf of a federal candidate (fundraiser, literature buttons, etc.) that you notify us of that activity. (See question #1) With this information you supply, the State Party is responsible for filing a consolidated report.

2. The second area of advice deals with union funds that your party committee may have received. Although it is legal under Minnesota law for us to accept and spend union dues money for elections, that money is prohibited at the Federal level. We have been advised that if your party committee has received funds from union treasuries and has spent or plans to spend on behalf of federal candidates, that this union money must be kept in a separate bank account. None of these monies can be spent on behalf of federal candidates. See questions #2.
3. Finally, if your individual committee (county or congressional district committee) has given and/or spent \$1,000 for a federal candidate, you must register and file with the FEC. See question #3.

Please do not hesitate to call me with any questions or with any questions at all dealing with the election finance laws. I realize that the laws are very complicated. Both Laura Lotwinick of our staff and myself are working with them on a daily basis and will do whatever possible to simplify things for you. Again, thank you for your cooperation. I look forward to hearing from you.

REMINDER: IT IS IMPORTANT THAT YOU NOTIFY US IMMEDIATELY WITH THIS INFORMATION AS WE MUST FILE OUR REPORT WITH THE FEC ON SEPTEMBER 2.

CC: County Unit Chair
County Unit Associate Chair
Congressional District Chair
Congressional District Associate Chair
Federal level candidate campaign managers & treasurers
etc.

EXHIBIT D

701
RECEIVED
FEDERAL ELECTION
COMMISSION

600
5477

Joseph T. Dixon, Jr.
1208 Title Insurance Building
Minneapolis, Minnesota 55401

NOV 4 AM 9:21

November 1, 1978

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

807619

Re: Third District DFL Congressional Fund
(FEC#00002113) Pre-November 7, 1978
General Election Report

Gentlemen:

Enclosed please find the Pre-General Election Report covering the period 10-1-78 through 10-31-78, FEC Form 3 and supporting forms. Also enclosed and hereby filed please find an Amended Statement of Organization whereby the above-captioned committee registers and qualifies as a multi-candidate committee.

I would also take this opportunity to address two other points:

1. The legal basis for making the additional \$1,750 contribution to the Freeman Volunteer Committee disclosed in the enclosed Report; and
2. The reasons why this filing is late and why no action should be taken against me.

For purposes of overall clarity I will address these two issues in order.

1. As the Commission's records will reflect, I received a complaint (MUR 701) dated September 25, 1978 con-

79040092051

Federal Election Commission
November 1, 1978
Page Two

79040092052

cerning prior contributions to the Freeman Campaign Committee in the amount of \$2150. The basis for the complaint was the apparent violation of the \$1,000 per election limitation on political committees to candidates for federal election. By letter dated October 10, 1978, I provided the Commission an extensive response to MUR 701 explaining why, in my view, the prior contributions had not been in violation of federal law and requesting its advice on a number of points, any one of which, I believe would make it clear that additional contributions could be made to the Freeman Volunteer Committee. Since that time I have had telephone conversations on October 20 and October 31 with Miriam Aguiar, David Fisk and Gary Lipkin of the FEC attempting to get from them definitive answers to the questions contained in my letter of October 10 so that the Third District DFL Congressional Fund might act in advance of the general election. Despite what I am sure were their best efforts, and partially because of Miriam Aguiar's sudden family emergency which required her to leave Washington, I have not been able to receive any definitive guidance on the issues involved. Because of that inability to obtain needed advice, and because of what was perceived as an urgent need for action by the Third District DFL in advance of the general election, we have made an additional contribution to the Freeman campaign in the amount of \$1750 as disclosed in these reports. The following are the two basis under which I believe the contribution to be legal:

A. As disclosed in the enclosed Amended Statement of Organization, the Third District DFL Congressional Fund has met all the requirements for a multi-candidate committee. We have been registered as a political committee with the Commission for more than six months, we have made contributions, as shown on the enclosed Pre-General Election Report, to five candidates for federal election, and we have received contributions from more than 50 contributors. As a multi-candidate committee, the Third District DFL Congressional Fund is entitled to make contributions of up to \$5,000 per candidate per election.

B. The Third District DFL Congressional Fund may be, and probably is, an affiliated committee of the state DFL (Minnesota Dollars for Democrats) which is

itself a multi-candidate committee. As an affiliated committee of this multi-candidate committee the "Fund" is included within the overall \$5,000 contribution limitation applicable.

Further, I have obtained written authorization from the state party committee to make the contribution reported herein and have been advised by the Freeman Volunteer Committee that by making such a contribution it will not cause the Freeman Volunteer Committee to have received more than \$5,000 from the state party committee and all known affiliated committees of the state party committee. Copies of this correspondence are attached.

We believe that under either of the above rationales, the contribution disclosed herein is legal and that we have exercised our best efforts to assure full compliance with all requirements of the FEC.

2. With respect to the late filing, I would ask that no action be taken because I have been awaiting word from the Commission staff with respect to the questions raised in my October 10 letter. On October 20, I was advised by Miriam Aguiar that I might expect to hear from her with respect to those questions, and the actions discussed above, sometime during the week of October 23. Further, she advised me that she would give me a telephone call after a final determination had been made, but before any formal written letter was actually mailed. Further, I telephoned Ms. Aguiar on October 27 and was advised that she was out of the office at that time and would return the call on Monday. It was not until Tuesday, October 31, 1978 that I was telephoned by Gary Lipkin and advised that Ms. Aguiar had been called out of the city because of a family emergency and that no determination as of yet had been made with respect to my October 10 letter. I now appreciate that perhaps I should have filed the report when I failed to reach Ms. Aguiar on Friday, October 27. However, inasmuch as I anticipated making the contributions discussed herein I desired to hold off on filing the report in order to make the entire document self-contained.

If I can be of further assistance or provide the Commission with additional information please let me know. I

79010092053

Federal Election Commission
November 1, 1978
Page Four

can only say that I have spent a substantial amount of time and effort attempting to comply fully with the statutes and regulations involved in the administration of the FEC and believe that I have demonstrated both good faith and full compliance with the law.

Very truly yours,

Joseph T. Dixon, Jr.
Treasurer, 3rd District DFL
Congressional Fund

JTD:jms
Enclosures
cc: Mr. Gary Lipkin, FEC ✓
Mr. Tom Borman, Treasurer,
Freeman Volunteer Committee

79040092054

A Fresh Leader . . .

Michael Freeman

Democrat

5814 Excelsior Boulevard
St. Louis Park, Minnesota 55416
Phone: 612/927-8458

October 30, 1978

Dear Joe:

This letter is in confirmation of our recent phone conversation. Rest assured that we have not raised \$5,000 from DFL affiliated organizations since the September 12, primary election. Even if the Third District DFL should give us a full \$1,800, we would not exceed \$5,000.

Sincerely,



Tom Borman

DFL/Labor endorsed for Third District Congress



MINNESOTA
**DEMOCRATIC
FARMER LABOR
PARTY**

730 East 38th Street, Minneapolis, Minnesota 55407 (612) 827-5421

Bob Scott
Chair
Gore Rempel
Associate Chair
Tom Mott
Secretary
David Landoff
Treasurer

STATE CENTRAL COMMITTEE

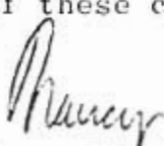
October 24, 1978

Joe Dixon
1200 Title Insurance Bldg
Minneapolis, MN 55401

Dear Joe,

If in fact the 3rd District DFL is an affiliated committee of the Minnesota Dollars for Democrats, the 3rd District should be allowed to contribute up to \$1800.00 to the Freeman for Congress Volunteer Committee.

To the best of my knowledge, the party committees of Minnesota have not exceeded \$3200.00 of the \$5000.00 limit we are bound by if these committees are affiliates of the State Party.


Nancy Wirth
DFL Finance Director

opeiu:12

REPORT OF RECEIPTS AND EXPENDITURES
FOR A CANDIDATE OR COMMITTEE
SUPPORTING CANDIDATE(S) FOR
NOMINATION OR ELECTION TO FEDERAL OFFICE

(Except for Candidates or Committees Receiving Federal Matching Funds)

RECEIVED
FEDERAL ELECTION
COMMISSION

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 Third District DFL Congressional Fund

Name of Candidate or Committee (in full)

1200 Title Insurance Building

Address (number and street)

Minneapolis, Minnesota 55401

City, State and ZIP Code

☐ Check if address is different than previously reported.

Year of Election

2 I.D. No. FEC#00002113

Candidate/Committee

3

Office Sought, State/District (if applicable)

4 Type of Report (check appropriate boxes)

☐ April 10 Quarterly Report

☒ Tenth day report preceding general election
(primary, general or convention)

☐ Termination Report

☐ July 10 Quarterly Report

on _____ in the State of _____
(date)

☐ Amendment for:

☐ October 10 Quarterly Report

☐ Thirtieth day report following _____ election
(primary, general or convention)

(which report)

☐ January 31 Annual Report

☐ Monthly Report

on _____ in the State of _____
(month) (date)

This is a report for

☐ Primary Election

☒ General Election

☐ Primary and General

☐ Other (special, runoff, etc.)

SUMMARY OF RECEIPTS AND EXPENDITURES

(Figures may be rounded to nearest dollar.)

5 Covering Period	Column A This Period	Column B Calendar Year-To-Date
10-1-78 Through 10-31-78		
7 Cash on hand at beginning of reporting period	\$ 1,352.52	\$ 2,621.88
8 Total receipts (from line 6)	\$ 325.88	\$ 8,654.88
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 1,828.40	\$ 11,426.76
9 Total expenditures (from line 2B)	\$ 1,620.00	\$ 11,210.36
10 Cash on hand at close of reporting period (Subtract line 9 from line 6a)	\$ 58.40	\$ 58.40
11 Value of contributed items on hand to be liquidated (Attach itemized list)	\$	
12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C) *	\$ -0-	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C) *	\$ -0-	

* See Schedule C attached.

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

11/1/78

(Date)

Joseph T. Dixon, Jr.

(Typed Name of Treasurer or Candidate)

(Signature of Treasurer or Candidate)

Note: Submission of false, erroneous, or incomplete information may subject the person giving this Report to the penalties of 2 U.S.C. Section 437g, or Section 441j (see reverse side of form).

For further
information,
Contact:

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

or call 800/424-9530

Approved by GAO
B-187620 (110506)
Expires 3-31-81

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

Any information reported herein may not be copied for sale to, or use by, any person for purposes of soliciting contributions or for any commercial purpose.

DETAILED SUMMARY OF RECEIPTS AND EXPENDITURES
(Page 2, FEC FORM 3)

NAME OF CANDIDATE OR COMMITTEE		REPORT COVERING THE PERIOD	
Third District DFL Congressional Fund		FROM: 10-1-78	TO: 10-31-78
RECEIPTS		Column A This Period	Column B Calendar Year-To-Date
14. Contributions from individuals (including contributions in kind):			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Sales and collections included above: List by event on memo Schedule D (\$)			
(d) Subtotal of contributions from individuals		\$ -0-	\$ 2,467.00
15. Transfers from Political Committees:			
(a) Funds from affiliated/authorized committee (itemize on Schedule A regardless of amount)		\$	
(b) Funds from other committees (itemize on Schedule A regardless of amount)		\$	
(c) Contributions in-kind from political committees (itemize on Schedule A regardless of amount)		\$	
(d) Subtotal of transfers in and contributions in kind from political committees		\$	\$ 4,050.00
16. Other Income:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of other income		\$ -0-	\$ -0-
17. Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of loans and loan repayments received		\$ -0-	\$ 600.00
18. Refunds, Rebates, Returns of Deposits:			
(a) Itemized (use Schedule A)		\$ 325.88	
(b) Unitemized		\$	
(c) Subtotal of refunds, rebates, and returns of deposits		\$ 325.88	\$ 1,537.88
19. Total Receipts		\$ 325.88	\$ 8,654.88
EXPENDITURES			
20. Operating Expenses:			
(a) Itemized (use Schedule B)		\$	
(b) Unitemized		\$	
(c) Subtotal of operating expenditures		\$ -0-	\$ 8,782.48
21. Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Through Schedule B		\$	
(b) Unitemized		\$	
(c) Subtotal of loans and loan repayments made and contribution refunds		\$ -0-	\$ -0-
22. Transfers Out to Political Committees:			
(a) To affiliated/authorized committee (itemize on Schedule B regardless of amount)		\$	
(b) To other committees (itemize on Schedule B regardless of amount)		\$ 1,620.00	
(c) Contributions in-kind to other committees (itemize on Schedule B regardless of amount)		\$	
(d) Subtotal of transfers out		\$ 1,620.00	\$ 5,435.88
23. Independent Expenditures (use Schedule E)		\$ -0-	\$ -0-
24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d)) (itemize on Schedule F)		\$ -0-	\$ -0-
25. Total Expenditures		\$ 1,620.00	\$ 11,218.36
RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
26. Total Receipts (from line 19)		\$	
27. Transfers In (from line 15(d))		\$	
28. Net Receipts (Subtract line 27 from line 26)		\$	
29. Total Expenditures (from line 25)		\$	
30. Transfers Out (from line 22(d))		\$	
31. Net Expenditures (Subtract line 30 from line 29)		\$	

Name of Candidate or Committee in Full			
Third District DFL Congressional Fund			
Full Name, Mailing Address and ZIP Code Northwestern Bell Telephone Co. 1432 Soo Line Building Minneapolis, MN 55402	Principal Place of Business Same Occupation telephone company	Date (month, day, year) 10-4-78	Amount of each Receipt this Period 325.88
Receipt for return of deposit <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
SUBTOTAL of receipts this page (optional)			\$
TOTAL this period (last page this line number only)			\$ 325.88

**SCHEDULE B
REVISED**

January, 1978
Federal Election Commission
325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind,
Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c
of FEC FORM 3

Page 1 of 1 for
Line Number 22b

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full			
Third District DFL Congressional Fund			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Anderson Volunteer Comm. Box 550 Minneapolis, MN 55440	Contribution		
	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	10-31-78	5.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Sabo Volunteer Comm. 2007 S. Lyndale Minneapolis, MN 55405	Contribution		
	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	10-31-78	5.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Sikorski Volunteer Comm. 222 North Concord So. St. Paul, MN 55075	Contribution		
	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	10-31-78	
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Comidine Volunteer Comm. Box 1065 Mankato, MN 56001	Contribution		
	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	10-31-78	5.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Freeman Volunteer Comm. 5814 Excelsior Blvd. Minneapolis, MN 55416	Return of Contribution Contribution		
	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input checked="" type="checkbox"/> Other	10-9-78 10-31-78	(-150.00) 1,750.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures this page (do not include refund of contribution)			\$
TOTAL this period (last page this line must be zero)			\$ 1,620.00

SCHEDULE C

REVISED

January, 1978

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

DEBTS AND OBLIGATIONS

Supporting Line Numbers 12 and 13
of FEC FORM 3

(Indicate Primary or General Election for each Entry)

Page 1 of 1 forLine Number 13(Use Separate Schedules for
each numbered line)

Name of Candidate and Committee in Full

Third District DFL Congressional Fund

Full Name, Mailing Address and ZIP Code of Debtor or Creditor

Anderson Volunteer Committee
Flour Exchange Building
Minneapolis, MN 55402Date (month,
day, year)

4-8-78

Amount of Original
Debt, Contract,
Agreement or
Promise

\$ 600.00

Cumulative
Payment
To Date

\$ -0-

Outstanding
Balance at
Close of
This Period

\$ -0-

☐ Primary☐ General☒ Other

NATURE OF OBLIGATION (Details of Debt)

Obligation to repay previously reported debt cancelled.

Full Name, Mailing Address and ZIP Code of Debtor or Creditor

Date (month,
day, year)Amount of Original
Debt, Contract,
Agreement or
PromiseCumulative
Payment
To DateOutstanding
Balance at
Close of
This Period☐ Primary☐ General☐ Other

Full Name, Mailing Address and ZIP Code of Debtor or Creditor

Date (month,
day, year)Amount of Original
Debt, Contract,
Agreement or
PromiseCumulative
Payment
To DateOutstanding
Balance at
Close of
This Period☐ Primary☐ General☐ Other

NATURE OF OBLIGATION (Details of Debt)

SUBTOTALS this period this page (optional)

\$

\$

\$

TOTAL this period (last page this line number only)

\$ 600.00

\$ -0-

\$ -0-

Copy outstanding balance only to appropriate line of summary

79040092051

DEBTS AND OBLIGATIONS

Supporting Line Numbers 12 and 13
of FEC FORM 3

Page 1 of 1 for

Line Number 12

(Use Separate Schedules for
each numbered line)

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full

Third District DFL Congressional Fund

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Minnesota Dollars for Democrats 730 East 38th Street Minneapolis, Minnesota 55407				
<input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other	3-17-78	\$5,000	\$ 3,750	\$ -0-

NATURE OF OBLIGATION (Details of Debt):

Balance of previously reported undertaking cancelled.

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		\$	\$	\$

NATURE OF OBLIGATION (Details of Debt):

SUBTOTALS this period this page (optional)	\$	\$	\$
TOTAL this period (last page this line number only)	\$ 5,000	\$ 3,750	\$ -0-

Clerk Substantially Complete only to appropriate line of summary

AMENDED
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.)

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) <input type="checkbox"/> Check if name or address is changed	2 Identification Number
Third District DFL Congressional Fund	FEC#00002113
(b) Address (number and street) 1200 Title Insurance Building	3 Date 10/31/78
(c) City, State and ZIP code Minneapolis, Minnesota 55401	4 Is this an amended statement <input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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.)

17 (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

C. Corral, Primary, Houghton, et al.

held in

(Year of location in %1990)

and will file all reports and statements with the public

Downloaded At: 11:53 11 September 2009

[註] 1. 此處之「*the*」係指「*the*」字在句中之位置而言，而非指「*the*」字之詞性而言。

— Tel.: 011 222 222 2222, e-mail: info@univnet.org and univnet@univnet.org

67 years of Candidate

that $\mathcal{L}_1 \cup \mathcal{L}_2$ is a limit-free complete

(iii) \mathcal{C} is a \mathcal{C} -candidate supports more than one \mathcal{F} -candidate and is not a party committee.

22619 This committee is a Congressional level committee in Minnesota DEL and, pursuant to this amended statement, is demonstrating its status as a multi-candidate political committee.

Names of affiliated and/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

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).

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 provided on separate page(s).

A Fresh Leader . . .

5334

Michael Freeman

Democrat

73 OCT 27 PM 2:17

October 23, 1978

5814 Excelsior Boulevard
St. Louis Park, Minnesota 55416
Phone: 612/927-8458

807389

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

Re: Your File No. MUR-701

Dear Ms. Aguiar:

Pursuant to our conversation, I am enclosing a copy of the letter I sent to Third District DFL Chairman William Barbeau when I returned the \$150 in question. I hope this letter will complete your file on this matter.

Sincerely yours,

David A. Jones
David A. Jones

DAJ/prp
Encl

DFL/Labor endorsed for Third District Congress

October 2, 1978

7 2 0 4 0 0 9 2 0 6 7
William Barbeau
Chairman of 3rd District DFL
4860 W. 39th St.
Apt. #115
St. Louis Park, Mn. 55416

Dear Bill,

You are aware of the complaint filed against our campaign for contributions received from the 3rd District DFL Congressional Fund. I am returning to you a check for \$150.00 which represents the amount by which the contributions from the "Fund" exceed the contribution limits for individuals.

In my letter to the F.E.C., I explained that we were returning the monies as a gesture of "good faith" and not in any sense as an admission of wrongdoing.

Thank you,

Tom Borman

Tom Borman



73 OCT 11 2 11

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



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO

CHARLES STEELE

FROM:

MARJORIE W. EMMONS *MJE lyp*

DATE:

OCTOBER 20, 1978

SUBJECT:

MUR 701 - Interim Report dated 10-17-78,
Signed: 10-18-78
Received in OCS: 10-19-78,
12:08

The above-named document was circulated on a 24
hour no-objection basis at 3:30, October 19, 1978.

The Commission Secretary's Office has received
no objections to the Interim Report as of 3:30 this
date.

70040092069

October 19, 1978

MEMORANDUM TO: Marge Samons
FROM: Eliana S. Carr
SUBJECT: MGR 701

Please have the attached Interim Report on MGR 701
distributed to the Commission.

Thank you.

79040092076

RECEIVED
OFFICE OF THE
COMMISSIONER

BEFORE THE FEDERAL ELECTION COMMISSION

October 17, 1978

78 OCT 19 PM 2:08

In the Matter of)
Freeman Volunteer Committee) MUR 701
Third District DFL Congressional)
Fund)

INTERIM REPORT

On 28 September 1978, respondents received notification that reason to believe had been found concerning violations of 2 U.S.C. §441a(a)(1)(A). Mr. Thomas Borman, treasurer for the Committee, advised the Commission by telephone on 2 October 1978 that as a "good faith effort," the Committee intended to return \$150 of the \$2150 aggregate contributions to the Fund. Mr. Borman confirmed this conversation with a letter and a copy of the \$150 check to the Fund. (See attachment I).

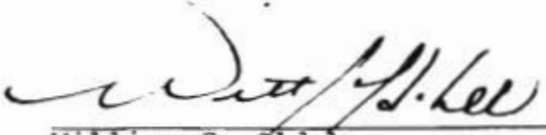
Mr. Joseph Dixon, treasurer for the Fund, advised the Commission by telephone on 17 October 1978 that the Fund had mailed a response on 10 October 1978. At this writing, the Office of General Counsel is awaiting receipt of the Fund's response.

79010092071

On 2 October 1978, the Commission received a letter from the complainant in which she alleged a further violation of §441a involving a \$1000 contribution to the Committee from the Fund on 23 August 1978. (See attachment II). The contribution to which complainant refers has been addressed in the First General Counsel's report sent to the Commission on 19 September 1978.

The Office of General Counsel will submit a full report on this matter to the Commission after the Fund's response has been received and analyzed.

10/18/78
Date


William C. Oldaker
General Counsel

Attachments

1. Letter from Mr. Thomas Borman.
2. Letter from complainant.

(612) 927-8458

79010092073

PETERSON VOLUNTARY COMPANY


 17-1
 670

1516

17-1
670

3rd District DFL

DATE

Oct 3

AMOUNT

\$150.00

TO THE
ORDER OF

NOT NEGOTIABLE

CO-deie

NOV 1968

RECEIVED
FEDERAL ELECTION
COMMISSION

900#5729

78 OCT 10 AM: 53

October 2, 1978

806765

200999071
Miriam Aguiar
Federal Election Commission, General Counsel's Office
1325 K. St. N.W.
Washington, D.C. 20463

Dear Ms. Aguiar,

As I indicated in our phone conversation, the Freeman Volunteer Committee is today returning \$150.00 to the 3rd District DFL Congressional Fund. That is the amount by which the contributions from the "Fund" exceed the contribution limits applicable to them if they are determined by the F.E.C. to be an individual, and not a multi-candidate committee. I am enclosing a copy of my letter to the "Fund" and our check for \$150.00

I want to mention that we are refunding this money, not as an admission of wrongdoing, but as a demonstration to the F.E.C. of our continuing interest in complying with your disclosure provisions.

Thank you.

Sincerely,

Thomas H. Borman

Thomas H. Borman

RECEIVED
FEDERAL ELECTION
COMMISSIONMUR 701
Aguirre 2

September 26, 1973

'78 OCT 2 AM 11:13

806629

The Honorable Joan D. Aikens, Chairman
Federal Election Commission
1325 K Street Northwest
Washington, D. C. 20463

Dear Chairman Aikens:

On August 29, 1973, I filed a complaint on behalf of the Frenzel Volunteer Committee and Congressman Bill Frenzel, Third District, Minnesota, against the Freeman for Congress Volunteer Committee alleging the acceptance of \$1,150 in primary contributions from the Third District DFL Committee. A copy of that complaint is attached as Exhibit A.

The Freeman for Congress Volunteer Committee in its pre-primary report, Schedule A, Page 2, line 15b, reported acceptance of an additional \$1,000 primary contribution from the Third District DFL Committee. A copy of that report is attached as Exhibit B.

I believe this to be in further violation of 2 U.S.C. Section 441 (a)(1)(A). Please include this additional information as part of the original file on this matter.

Sincerely,

LaVonne Samstad

LaVonne Samstad
7340 York Avenue South
Apartment 4-210
Edina, Minnesota 55435

cc: Lester W. Scall, Esq.
Enc1.

Subscribed and sworn to before me this

28th day of September, 1973.*Jo Ann F. Glomski*
Notary Public

JO ANN F. GLOMSKI
Notary Public, Hennepin County, Minn.
My Commission Expires Dec. 2, 1982

August 29, 1978

The Honorable Joan D. Aikens, Chairman
Federal Election Commission
1325 K Street Northwest
Washington, D.C. 20463

Dear Chairman Aikens:

Please find enclosed for the Commission's consideration
a Statement of Alleged Violation, which is herewith filed
against the Freeman for Congress Volunteer Committee.

If you need any further information from me, please let
me know.

Sincerely,

LaVonne Samstad

LaVonne Samstad

Enclosure

EXHIBIT A

STATEMENT OF ALLEGED VIOLATION

Pursuant to 2 U.S.C. Section 437g, LaVonne Samstad, being first duly sworn, on oath states that: This complaint is filed on behalf of the Frenzel Volunteer Committee, and Congressman Bill Frenzel, Third District, Minnesota, alleging the following violation of the Federal Election Campaign Act of 1971, as amended, by the Freeman for Congress Volunteer Committee:

70010792077
The Freeman for Congress Volunteer Committee reported on its July 10, 1978 Quarterly Report, Schedule A, Page 2, line 15b, acceptance of \$1,150 in primary contributions from the Third District DFL Committee. A copy of that portion of the Freeman Committee report is attached as Exhibit A. The Third District DFL Committee registered with the Federal Election Commission as a political committee on April 17, 1972. Since the Third District DFL Committee is not a qualified multi-candidate committee, the Freeman for Congress Volunteer Committee has reported acceptance of an illegal contribution under 2 U.S.C. Section 441 (a)(a)(1)(A).

The attached documentation of the acceptance of an illegal contribution is our grounds for believing that the Freeman for Congress Volunteer Committee has violated the Federal Election Campaign Act of 1971, as amended.

Statement of Alleged Violation
Page 2

If the Commission agrees that there is reason to believe that a violation has occurred, we urge the Commission to investigate the matter and to take appropriate action.

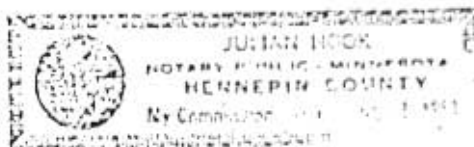
LaVonne Samstad

LaVonne Samstad
7340 York Avenue South
Apartment 6-210
Edina, Minnesota 55435

Subscribed and sworn to
before me this 28th day
of August, 1978.

Julian Hook

Notary Public



**SCHEDULE A
REVISED**

January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20043

ITEMIZED RECEIPTS

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

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

Page 2 of 2 for

Line Number 15b

File Separate Schedules for
each numbered line

Name of Candidate or Committee in Full			
Michael O. Freeman for Congress Committee			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date received (day, year)	Amount of each Receipt this Period
Minnesota Chiropractic P.A.C. 2092 E. 11th Avenue North St. Paul, MN. 55109	Occupation	6/30/78	\$500.00
Receipt for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ 500.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date received (day, year)	Amount of each Receipt this Period
Railway Clerks, Political League 6300 River Rd. Rosemont, Illinois 60018	Occupation	6/30/78	\$500.00
Receipt for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ 500.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date received (day, year)	Amount of each Receipt this Period
Third District DFL Legislative Fund 4860 W. 39th St. Mpls, MN. 55416	Occupation	4/6/78	\$150.00
Receipt for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ 1150.00	6/30/78	\$1000.00
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date received (day, year)	Amount of each Receipt this Period
Thirty-Eighth Senate District 7920 Gallagher Drive Minneapolis, Mn. 55436	Occupation	5/16/78	\$ 50.00
Receipt for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ 50.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date received (day, year)	Amount of each Receipt this Period
Thirty-Seventh District DFL 6025 Thomas Avenue South Minneapolis, Mn. 55419	Occupation	6/30/78	\$ 50.00
Receipt for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ 50.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date received (day, year)	Amount of each Receipt this Period
UAW V Cap 8000 E. Jefferson Detroit, Michigan 48214	Occupation	4/24/78	\$5,000.00
Receipt for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ 5,000.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date received (day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$		
SUBTOTAL of receipts this page (attach all)			\$ 7250.00
TOTAL All the period last page (this line number only)			\$ 8500.00

EXHIBIT A

1978
Election Commission
Street, N.W.
Arlington, 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

Page 2 of 2 for

Line Number 15b

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full			
Freeman Volunteer Committee			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each this Period
Political Education Committee Fund 750 Overton Drive NE Fridley, Mn. 55432	Occupation	8/23/78	\$50.00
Receipt for:	<input type="checkbox"/> Check if Contributor is self-employed		
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Aggregate Year-To-Date ... \$ 50.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each this Period
Sheet Metal Workers' International Association P.A. League 1750 New York Avenue NW Washington, D.C. 20006	Occupation	8/23/78	\$300.00
Receipt for:	<input type="checkbox"/> Check if Contributor is self-employed		
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Aggregate Year-To-Date ... \$ 300.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each this Period
Third District DFL Legislative Fund 4860 W. 39th Street Minneapolis, Mn. 55416	Occupation	8/23/78	\$1000.00
Receipt for:	<input type="checkbox"/> Check if Contributor is self-employed		
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Aggregate Year-To-Date ... \$ 2150.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each this Period
I.L.G.W.U. Campaign Committee 1710 Broadway New York, N.Y. 10019	Occupation	8/25/78	\$500.00
Receipt for:	<input type="checkbox"/> Check if Contributor is self-employed		
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Aggregate Year-To-Date ... \$ 500.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each this Period
IMPACE Box 17203 St. Paul, Mn. 55117	Occupation	8/25/78	\$3000.00
Receipt for:	<input type="checkbox"/> Check if Contributor is self-employed		
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Aggregate Year-To-Date ... \$ 3000.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each this Period
	Occupation		
Receipt for:	<input type="checkbox"/> Check if Contributor is self-employed		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each this Period
	Occupation		
Receipt for:	<input type="checkbox"/> Check if Contributor is self-employed		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Aggregate Year-To-Date ... \$		
SUBTOTAL of receipts this page (initially)			\$ 4850.00
			\$

ENSON & EFRON

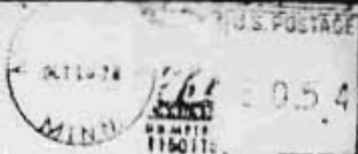
PROFESSIONAL ASSOCIATION

LAWYERS

1200 TITLE INSURANCE BUILDING

MINNEAPOLIS, MINNESOTA 55401

FEDERAL ELECTION
COMMISSION



'78 OCT 13 AM 9:17

HENSON & EFRON, P. A.

1200 TITLE INSURANCE BUILDING

MINNEAPOLIS, MINNESOTA 55401

To

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

79040092031

7 9 0 1 0 9 2 0 8

FRENCH VOLUNTEER COMMITTEE

NORTHWESTERN
NATIONAL BANK
OF MINNEAPOLIS

State Office
Twenty and Minnesota
Boulevard, MINNEAPOLIS

1516

X-17-1
910

3rd District DFL

DATE

Oct 3

AMOUNT

\$150.00

NOT NEGOTIABLE

CO-Dee

RECEIVED
FEDERAL ELECTION
COMMISSION

YCC#5789

18 OCT 10 AM: 53

October 2, 1978

806766

Miriam Aquiar
Federal Election Commission, General Counsel's Office
1325 K. St. N.W.
Washington, D.C. 20463

Dear Ms. Aquiar,

As I indicated in our phone conversation, the Freeman Volunteer Committee is today returning \$150.00 to the 3rd District DFL Congressional Fund. That is the amount by which the contributions from the "Fund" exceed the contribution limits applicable to them if they are determined by the F.E.C. to be an individual, and not a multi-candidate committee. I am enclosing a copy of my letter to the "Fund" and our check for \$150.00

I want to mention that we are refunding this money, not as an admission of wrongdoing, but as a demonstration to the F.E.C. of our continuing interest in complying with your disclosure provisions.

Thank you.

Sincerely,

Thomas H. Borman

Thomas H. Borman

**A New
Generation
Democrat**



**MIKE
FREEMAN**

5814 Excelsior Blvd.
St. Louis Park, MN 55416



*Miriam Aguilar
Federal Elections Comm.
General Counsel's Office
1325 K. St. N.W.
Wash. D. C. 20463*



FEDERAL ELECTION COMMISSION

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

September 25, 1978

Third District Democratic-Farmer-Labor
(DFL) Congressional Fund
Joseph T. Dixon, Treasurer
1200 Title Insurance Building
Minneapolis, MN 55401

Re: MUR 701

Dear Mr. Dixon:

The Federal Election Commission has received a complaint which alleges the Third District DFL Party committed certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 701.

The Commission has reason to believe that the matters alleged in the complaint state a violation of 2 U.S.C. §441a(a)(1)(A). It appears that prior to the September 12, 1978 primary election, the Third District DFL Party contributed an aggregate amount of \$1,150 (\$150 on April 6, 1978 and \$1,000 on June 30, 1978) to the Freeman Volunteer Committee ("Committee"), entered as an expenditure for the primary election. The Commission's records disclose that the Third District DFL Party, subsequently the Third District DFL Congressional Fund ("Fund"), is a party related committee which has not qualified as a multicandidate committee under 2 U.S.C. §441a(a)(4). The Fund is limited to aggregate contributions of \$1,000 to any candidate or his authorized political committees "with respect to any election for Federal office." Therefore, your aggregate contributions appear to be in violation of 2 U.S.C. §441a(a)(1)(A).

The Committee reports list these contributions as coming from the Third District DFL Legislative Fund, which is listed at a separate address for identification. Further, the Committee and the Fund's 10 day pre-primary

report covering the period July 1, 1978 through August 28, 1978 disclosed an additional \$1,000 contribution from the Fund, for an aggregate \$2,150 allocated to the primary election of September 12, 1978.

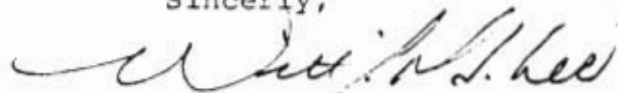
Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal material which you believe are relevant to the Commission's analysis. If your Fund made any of the contributions, please supply copies of both sides of the cancelled checks. 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 10 days after your receipt of this notification.

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 so notify us in writing.

Sincerely,



William C. Oldaker
General Counsel

701 Aquinas

1. SENDER: Complete items 2, 3, and 4. Add your address in the RETURN TO space on reverse.	
2. The following service is requested (check one): <input checked="" type="checkbox"/> Show to whom and date delivered <input type="checkbox"/> Show to whom, date, and address of delivery <input type="checkbox"/> RESTRICTED DELIVERY <input type="checkbox"/> RESTRICTED DELIVERY <input type="checkbox"/> Show to whom, date, and address of delivery \$ (CONSULT POSTMASTER FOR FEES)	
3. ARTICLE ADDRESSED TO: Third Dist. Dem. Farmer - Labor (DFW) Long Fund Joseph T. Duza, Treas	
4. REGISTERED NO. 943282	5. INSURED NO.
6. (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 DATE OF DELIVERY 9-18	
7. POSTMARK SEP 23 1978	
8. ADDRESS: Complete only if requested	
9. UNABLE TO DELIVER BECAUSE: <input type="checkbox"/> RECALL INITIALS	

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



FEDERAL ELECTION COMMISSION

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

September 25, 1978

Freeman Volunteer Committee
Thomas H. Borman, Treasurer
5814 Excelsior
Minneapolis, MN* 55416

Re: MUR 701

Dear Mr. Borman:

The Federal Election Commission has received a complaint which alleges the Freeman Volunteer Committee committed certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 701.

The Commission has reason to believe that the matters alleged in the complaint state a violation of 2 U.S.C. §441a(f) and 11 CFR §110.9(a). Specifically, it appears that the Freeman Volunteer Committee accepted aggregate contributions of \$2,150 (\$150 on April 6, 1978; \$1,000 on June 30, 1978; and \$1,000 on August 23, 1978) from the Third District Democratic Farmer Labor DFL Congressional Fund ("FUND"), a party related committee which is not qualified as a multicandidate committee in accordance with 2 U.S.C. §441a(a)(4) and thus limited to aggregate contributions of \$1,000 to any candidate or his authorized political committees "with respect to any election for Federal office." Therefore, your acceptance of contributions totalling \$2,150 appears to be in violation of 2 U.S.C. §441a(f) and 11 CFR §110.9(a).

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit 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.

72040092037

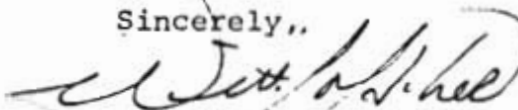
The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within 10 days after your receipt of this notification.

If you have any questions, please contact Miriam Aguiar, the staff member assigned to this matter, at 202-523-4052.

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 so notify us in writing.

Sincerely,,



William C. Oldaker
General Counsel

701 Aguiar

PS Form 3871, 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. c</p> <p><input checked="" type="checkbox"/> Show to whom, date, and address of delivery. c</p> <p><input type="checkbox"/> RESTRICTED DELIVERY Show to whom and date delivered. c</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>Freeman Volunteer Comm Thomas H. Borman, Treas</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>9433X</td> <td></td> <td></td> </tr> </table> <p>(Always obtain signature of addressee or agent)</p>			REGISTERED NO	CERTIFIED NO	INSURED NO	9433X		
REGISTERED NO	CERTIFIED NO	INSURED NO						
9433X								
<p>I have received the article described above</p> <p>SIGNATURE <input type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent</p> <p><i>Freeman Volunteer Comm</i></p>								
<p>4. DATE OF DELIVERY</p> <p>9-28-78</p>		<p>POSTMARK</p> 						
<p>5. ADDRESS: Complete only if requested</p> <p>78</p>								
<p>6. UNABLE TO DELIVER BECAUSE:</p>		<p>CLERK'S INITIALS</p>						

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Third District Democratic -)
Farmer-Labor (DFL) Congressional)
Fund)

Joseph T. Dixon, Treasurer)

and)

Freeman Volunteer Committee)
Thomas H. Borman, Treasurer)

MUR 701 (78)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on September 21, 1978, the Commission determined by a vote of 6-0, to adopt the recommendations of the General Counsel to take the following actions in the above-captioned matter:

1. Find reason to believe that the Third District (DFL) Congressional Fund is in violation of 2 U.S.C. §441a(a)(1)(A).
2. Find reason to believe that the Freeman Volunteer Committee is in violation of 2 U.S.C. §441a(f) and 11 CFR 110.9(a). Send letters attached to the First General Counsel's Report dated September 19, 1978.

Attest

9/21/78
Date

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

Received in Office of Commission Secretary: 9-19-78, 10:37
Circulated on 48 hour vote basis: 9-20-78, 1:30

September 19, 1978

MEMORANDUM TO: Marge Emmons

FROM: Elissa T. Carr

SUBJECT: MUR 701

Please have the attached First General Counsel's Report on MUR 701 distributed to the Commission on a 48 hour tally basis.

Thank you.

79040092090

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 SEP 19 1978

MUR NO. 701(78)
DATE COMPLAINT RECEIVED
BY OGC
STAFF
MEMBER Aguiar

COMPLAINANT'S NAME: LaVonne Samstad
Edina, Minnesota

RESPONDENTS:

Freeman Volunteer Committee
Thomas H. Borman, Treasurer
Minneapolis, MN

Third District Democratic-Farmer-Labor
(DFL) Congressional Fund
Joseph T. Dixon, Treasurer
Minneapolis, MN

RELEVANT STATUTES:

2 U.S.C. §441a(a)(1)(A)
2 U.S.C. §431(h)
2 U.S.C. §441a(a)(4)
2 U.S.C. §441a(f)
2 U.S.C. §437g(a)(3)(A)
11 CFR §110.9(a)

INTERNAL REPORTS CHECKED:

Public Records

BACKGROUND

In a notarized complaint dated August 29, 1978, the complainant alleges that respondent Third District DFL Party ("Party"), a non qualified party related committee, contributed an aggregate amount of \$1,150 to respondent Freeman Volunteer Committee ("Committee") prior to the primary election of September 12, 1978, in violation of 2 U.S.C. §441a(a)(1)(A). Complainant stated she was filing the complaint on behalf of the Frenzel Volunteer Committee and Congressman Bill Frenzel of Minnesota. 1/ (See Attachment I)

1/ 2 U.S.C. §437g(a)(3)(A) requires investigation of any reports filed by a complainant, if the complainant is a candidate. Commission records disclose that MUR 672 (78) concerned an investigation of the Frenzel Volunteer Committee, and that on August 21, 1978 the Commission found no reason to believe that the Frenzel Volunteer Committee violated the Act. An additional investigation, conducted pursuant to the present MUR, did not uncover any irregularities in the Frenzel Volunteer Committee reports for 1978.

EVIDENCE

An examination of respondent "Party's" July 10, 1978 quarterly report does disclose transfers out in the aggregate amount of \$1,150 to the "Committee." Corresponding entries were made in the Committee's July 10, 1978 quarterly report for receipt of aggregate contributions of \$1,150, from the Third District DFL Legislative Fund ("Fund"), which is listed at a separate address. The Commission's records show that the DFL Party submitted a name change on July 14, 1978 and is now the DFL Congressional Fund. Both the "Party" and the "Committee" record the transaction as monies transferred and received for the 1978 primary election.

An examination of the Committee and Funds 10-day pre-primary reports covering the period July 1, 1978 through August 28, 1978 disclosed a transfer out and subsequent receipt of an additional contribution of \$1,000 from the "Fund" to the Committee for the primary election. (See Attachment II)

ANALYSIS

2 U.S.C. §441a(a)(1)(A) provides that a person may not exceed \$1,000 in aggregate contributions to any candidate and his authorized committees per election. "Person" is defined by 2 U.S.C. §431(h) to include a committee and any other organization or group of persons. Public records disclose that the "Fund" has not qualified as a multicandidate committee in accord with 2 U.S.C. §441a(a)(4). Therefore the Fund is limited to contributions of \$1,000 per candidate or his or her authorized political committees per election, and has exceeded this limit by \$1,150 for the primary. The Committee, by accepting these contributions, may be in violation of 2 U.S.C. §441a(f) and 11 CFR §110.9(a).

The "Fund" made excessive contributions in the amount of \$1,150 in violation of 2 U.S.C. §441a(a)(1)(A).

RECOMMENDATION

1. Find reason to believe that the Third District DFL Congressional Fund is in violation of 2 U.S.C. §441a(a)(1)(A) and the Freeman Volunteer Committee is in violation of 2 U.S.C. §441a(f) and 11 CFR §110.9(a).
2. Send the attached letters to the respondents.

Attachments:

1. Complaint
2. Reports of Committee, Party & Fund
3. Proposed letters to Committee & Fund
4. Certification

4785-
FEDERAL ELECTION

August 29, 1978

'78 SEP 5 AM 10:13

005974

79010092093
The Honorable Joan D. Aikens, Chairman
Federal Election Commission
1325 K Street Northwest
Washington, D.C. 20463

Dear Chairman Aikens:

Please find enclosed for the Commission's consideration
a Statement of Alleged Violation, which is herewith filed
against the Freeman for Congress Volunteer Committee.

If you need any further information from me, please let
me know.

Sincerely,

LaVonne Samstad
LaVonne Samstad

Enclosure

STATEMENT OF ALLEGED VIOLATION

Pursuant to 2 U.S.C. Section 437g, LaVonne Samstad, being first duly sworn, on oath states that: This complaint is filed on behalf of the Frenzel Volunteer Committee, and Congressman Bill Frenzel, Third District, Minnesota, alleging the following violation of the Federal Election Campaign Act of 1971, as amended, by the Freeman for Congress Volunteer Committee:

70010092094
The Freeman for Congress Volunteer Committee reported on its July 10, 1978 Quarterly Report, Schedule A, Page 2, line 15b, acceptance of \$1,150 in primary contributions from the Third District DFL Committee. A copy of that portion of the Freeman Committee report is attached as Exhibit A. The Third District DFL Committee registered with the Federal Election Commission as a political committee on April 17, 1972. Since the Third District DFL Committee is not a qualified multi-candidate committee, the Freeman for Congress Volunteer Committee has reported acceptance of an illegal contribution under 2 U.S.C. Section 441 (a)(a)(1)(A).

The attached documentation of the acceptance of an illegal contribution is our grounds for believing that the Freeman for Congress Volunteer Committee has violated the Federal Election Campaign Act of 1971, as amended.

Statement of Alleged Violation
Page 2

If the Commission agrees that there is reason to believe that a violation has occurred, we urge the Commission to investigate the matter and to take appropriate action.

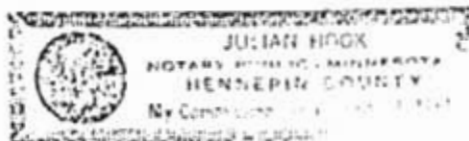
LaVonne Samstad

LaVonne Samstad
7340 York Avenue South
Apartment 6-210
Edina, Minnesota 55435

Subscribed and sworn to
before me this 20th day
of August, 1978.

Julian Hook

Notary Public



72040792095



FEDERAL ELECTION COMMISSION

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

Freeman Volunteer Committee
Thomas H. Borman, Treasurer
5814 Excelsior
Minneapolis, MN 55416

Re: MUR 701

Dear Mr. Borman:

The Federal Election Commission has received a complaint which alleges the Freeman Volunteer Committee committed certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 701.

The Commission has reason to believe that the matters alleged in the complaint state a violation of 2 U.S.C. §441a(f) and 11 CFR §110.9(a). Specifically, it appears that the Freeman Volunteer Committee accepted aggregate contributions of \$2,150 (\$150 on April 6, 1978; \$1,000 on June 30, 1978; and \$1,000 on August 23, 1978) from the Third District Democratic Farmer Labor DFL Congressional Fund ("FUND"), a party related committee which is not qualified as a multicandidate committee in accordance with 2 U.S.C. §441a(a)(4) and thus limited to aggregate contributions of \$1,000 to any candidate or his authorized political committees "with respect to any election for Federal office." Therefore, your acceptance of contributions totalling \$2,150 appears to be in violation of 2 U.S.C. §441a(f) and 11 CFR §110.9(a).

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit 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 10 days after your receipt of this notification.

If you have any questions, please contact Miriam Aguiar, the staff member assigned to this matter, at 202-523-4052.

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 so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

7 9 0 4 0 0 9 2 0 0 3



FEDERAL ELECTION COMMISSION

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

Third District Democratic-Farmer-Labor
(DFL) Congressional Fund
Joseph T. Dixon, Treasurer
1200 Title Insurance Building
Minneapolis, MN 55401

Re: MUR 701

Dear Mr. Dixon:

The Federal Election Commission has received a complaint which alleges the Third District DFL Party committed certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 701.

The Commission has reason to believe that the matters alleged in the complaint state a violation of 2 U.S.C. §441a(a)(1)(A). It appears that prior to the September 12, 1978 primary election, the Third District DFL Party contributed an aggregate amount of \$1,150 (\$150 on April 6, 1978 and \$1,000 on June 30, 1978) to the Freeman Volunteer Committee ("Committee"), entered as an expenditure for the primary election. The Commission's records disclose that the Third District DFL Party, subsequently the Third District DFL Congressional Fund ("Fund"), is a party related committee which has not qualified as a multicandidate committee under 2 U.S.C. §441a(a)(4). The Fund is limited to aggregate contributions of \$1,000 to any candidate or his authorized political committees "with respect to any election for Federal office." Therefore, your aggregate contributions appear to be in violation of 2 U.S.C. §441a(a)(1)(A).

The Committee reports list these contributions as coming from the Third District DFL Legislative Fund, which is listed at a separate address for identification. Further, the Committee and the Fund's 10 day pre-primary

report covering the period July 1, 1978 through August 28, 1978 disclosed an additional \$1,000 contribution from the Fund, for an aggregate \$2,150 allocated to the primary election of September 12, 1978.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal material which you believe are relevant to the Commission's analysis. If your Fund made any of the contributions, please supply copies of both sides of the cancelled checks. 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 10 days after your receipt of this notification.

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 so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

79010092100

SCHEDULE B
REVISED
 January, 1978
 Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20463

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions in Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

Page 1 of 1 for
 Line Number 22b

File Separate Schedules for
 each numbered item

Name of Candidate or Committee in Full

Third District Democratic-Farmer-Labor Party

Full Name, Mailing Address and ZIP Code

**Freeman for Congress
 5814 Excelsior Blvd.
 St. Louis Park, MN 55416**

Particulars of Expenditure

**Transfers Out - Con-
 tribution \$1,150.00**

Date Received

See 22a

Amount of each expend.

For this period

4-6-78

\$ 150.00

6-28-78

1,000.00

Expenditure for

☒ Political ☐ Personal ☐ Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date Received

See 22a

Amount of each expend.

For this period

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date Received

See 22a

Amount of each expend.

For this period

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date Received

See 22a

Amount of each expend.

For this period

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date Received

See 22a

Amount of each expend.

For this period

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date Received

See 22a

Amount of each expend.

For this period

79040092101

SCHEDULE A
 REVISED
 January, 1978
 Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20003

ITEMIZED REPORTS

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

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

Date 2 of 2

Line Number 255

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full			
Michael O. Freeman for Congress Committee			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Minnesota Chiropractic P.A.C. 2092 E. 11th Avenue North St. Paul, Minn. 55109	Occupation	6/30/78	\$500.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
Full Name, Mailing Address and ZIP Code	Approximate Year-To-Date \$500.00	Date (month, day, year)	Amount of each Receipt this Period
Railway Clerks, Political League 6300 River Rd. Rockmont, Illinois 60018	Principal Place of Business	6/30/78	\$500.00
Occupation			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
Full Name, Mailing Address and ZIP Code	Approximate Year-To-Date \$500.00	Date (month, day, year)	Amount of each Receipt this Period
Third District DFL Legislative Fund 4030 W. 39th St. Mpls, Minn. 55416	Principal Place of Business	4/6/78	\$150.00
Occupation		6/30/78	\$1000.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
Full Name, Mailing Address and ZIP Code	Approximate Year-To-Date \$1150.00	Date (month, day, year)	Amount of each Receipt this Period
Thirty-Eighth Senate District 7320 Gallagher Drive Minneapolis, Minn. 55436	Principal Place of Business	5/16/78	\$50.00
Occupation			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
Full Name, Mailing Address and ZIP Code	Approximate Year-To-Date \$50.00	Date (month, day, year)	Amount of each Receipt this Period
Thirty-Seventh District DFL 6225 Thomas Avenue South Minneapolis, Minn. 55419	Principal Place of Business	6/30/78	\$50.00
Occupation			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
Full Name, Mailing Address and ZIP Code	Approximate Year-To-Date \$50.00	Date (month, day, year)	Amount of each Receipt this Period
WWV Cap 8000 E. Jefferson Detroit, Michigan 48214	Principal Place of Business	4/24/78	\$5,000.00
Occupation			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
Full Name, Mailing Address and ZIP Code	Approximate Year-To-Date \$5,000.00	Date (month, day, year)	Amount of each Receipt this Period
	Principal Place of Business		
Occupation			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
Full Name, Mailing Address and ZIP Code	Approximate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
	Principal Place of Business		
Occupation			

70011414069

SCHEDULE A
REVISED
January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, 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

Page 2 of 3 for

Line Number 15b

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

Freeman Volunteer Committee

Full Name, Mailing Address and ZIP Code
Political Education Committee Fund
750 Overton Drive NE
Fridley, Mn. 55432

Principal Place of Business

Occupation

Date (month,
day, year)

Amount of each Receipt
this Period

8/23/78

\$50.00

Receipt for
☒ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year To Date \$ 50.00

Principal Place of Business

Date (month,
day, year)

Amount of each Receipt
this Period

Full Name, Mailing Address and ZIP Code

Sheet Metal Workers' International Association P.A. League
1750 New York Avenue NW
Washington, D.C. 20006

Occupation

8/23/78

\$300.00

Receipt for
☒ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year To Date \$ 300.00

Principal Place of Business

Date (month,
day, year)

Amount of each Receipt
this Period

Full Name, Mailing Address and ZIP Code

Third District DFL Legislative Fund
4860 W. 39th Street
Minneapolis, Mn. 55416

Occupation

8/23/78

\$1000.00

Receipt for
☒ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year To Date \$ 2150.00

Principal Place of Business

Date (month,
day, year)

Amount of each Receipt
this Period

Full Name, Mailing Address and ZIP Code

I.L.G.W.U. Campaign Committee
1710 Broadway
New York, N.Y. 10019

Occupation

8/25/78

\$500.00

Receipt for
☒ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year To Date \$ 500.00

Principal Place of Business

Date (month,
day, year)

Amount of each Receipt
this Period

Full Name, Mailing Address and ZIP Code

IMPACE
Box 17293
St. Paul, Mn. 55117

Occupation

8/25/78

\$3000.00

Receipt for
☒ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year To Date \$ 3000.00

Principal Place of Business

Date (month,
day, year)

Amount of each Receipt
this Period

Full Name, Mailing Address and ZIP Code

\$155.00

\$15.00

79040092103

Schedule B

July 1976
Federal Election Commission
1225 K Street, N.W.
Washington, D.C. 20543

Itemized Expenditures

Campaign Fundraising, Loans, and Transfers

for Lines 20, 22, 23, and/or 24 of FEC Form 3

(See instructions on back)

Page 1 of 1 forLINE NUMBER 24b

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

Name of Candidate or Committee in full

Third District DFL Congressional Fund

Full Name, mailing address and ZIP code

Freeman for Congress
5814 Excelsior Boulevard
St. Louis Park, MN 55416

Purpose of Expenditure

transfer out -
contribution:
Primary Election

Date (month,
day, year)

8/15/78

Amount of each expe-
diture this period

1,000.00

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)Amount of each expe-
diture this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)Amount of each expe-
diture this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)Amount of each expe-
diture this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)Amount of each expe-
diture this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)Amount of each expe-
diture this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)Amount of each expe-
diture this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)Amount of each expe-
diture this period

Total (Total reported expenditures)

P

1

Total (Total reported expenditures)

P

1,000.00

79040092104

79030913205

FEDERAL ELECTION COMMISSION

September 28, 1978

'78 OCT 2 AM 11:06

The Honorable Joan D. Aikens, Chairman
Federal Election Commission
1325 K Street Northwest
Washington, D. C. 20463

Dear Chairman Aikens:

On August 29, 1978, I filed a complaint on behalf of the Frenzel Volunteer Committee and Congressman Bill Frenzel, Third District, Minnesota, against the Freeman for Congress Volunteer Committee alleging the acceptance of \$1,150 in primary contributions from the Third District DFL Committee. A copy of that complaint is attached as Exhibit A.

The Freeman for Congress Volunteer Committee in its pre-primary report, Schedule A, Page 2, line 15b, reported acceptance of an additional \$1,000 primary contribution from the Third District DFL Committee. A copy of that report is attached as Exhibit B.

I believe this to be in further violation of 2 U.S.C. Section 441 (a)(a)(1)(A). Please include this additional information as part of the original file on this matter.

Sincerely,

LaVonne Samstad
LaVonne Samstad
7340 York Avenue South
Apartment 6-210
Edina, Minnesota 55435

cc: Lester N. Scall, Esq.
Encl.

Subscribed and sworn to before me this

28th day of September, 1978.

James F. Glomski
Notary Public

JOAN D. AIKENS
Notary Public - Hennepin County, Minn.
My Comm. Expires Dec. 2, 1980

79040092105

August 29, 1978

The Honorable Joan D. Aikens, Chairman
Federal Election Commission
1325 K Street Northwest
Washington, D.C. 20463

Dear Chairman Aikens:

Please find enclosed for the Commission's consideration
a Statement of Alleged Violation, which is herewith filed
against the Freeman for Congress Volunteer Committee.

If you need any further information from me, please let
me know.

Sincerely,

LaVonne Samstad
LaVonne Samstad

Enclosure

EXHIBIT A

STATEMENT OF ALLEGED VIOLATION

Pursuant to 2 U.S.C. Section 437g, LaVonne Samstad, being first duly sworn, on oath states that: This complaint is filed on behalf of the Frenzel Volunteer Committee, and Congressman Bill Frenzel, Third District, Minnesota, alleging the following violation of the Federal Election Campaign Act of 1971, as amended, by the Freeman for Congress Volunteer Committee:

The Freeman for Congress Volunteer Committee reported on its July 10, 1978 Quarterly Report, Schedule A, Page 2, line 15b, acceptance of \$1,150 in primary contributions from the Third District DFL Committee. A copy of that portion of the Freeman Committee report is attached as Exhibit A. The Third District DFL Committee registered with the Federal Election Commission as a political committee on April 17, 1972. Since the Third District DFL Committee is not a qualified multi-candidate committee, the Freeman for Congress Volunteer Committee has reported acceptance of an illegal contribution under 2 U.S.C. Section 441 (a)(a)(1)(A).

The attached documentation of the acceptance of an illegal contribution is our grounds for believing that the Freeman for Congress Volunteer Committee has violated the Federal Election Campaign Act of 1971, as amended.

Statement of Alleged Violation
Page 2

If the Commission agrees that there is reason to believe that a violation has occurred, we urge the Commission to investigate the matter and to take appropriate action.

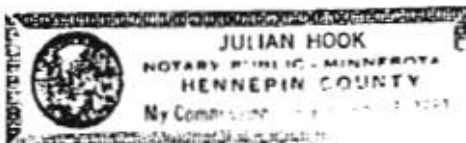
LaVonne Samstad

LaVonne Samstad
7340 York Avenue South
Apartment 6-210
Edina, Minnesota 55435

Subscribed and sworn to
before me this 20th day
of August, 1978.

Julian Hook

Notary Public



ITEMIZED RECEIPTS

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

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

Page 2 of 2 for
 Line Number 15b

File Separate Schedules for
 each numbered line!

Name of Candidate or Committee in Full

Michael O. Freeman for Congress Committee

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Minnesota Chiropractic P.A.C. 2092 E. 11th Avenue North St. Paul, MN. 55109	Occupation	6/30/78	\$500.00
Receipt for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ 500.00		
Full Name, Mailing Address and ZIP Code Railway Clerks, Political League 6300 River Rd. Rosemont, Illinois 60018	Principal Place of Business	6/30/78	\$500.00
Receipt for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ 500.00		
Full Name, Mailing Address and ZIP Code Third District DFL Legislative Fund 4860 W. 39th St. Mpls, MN. 55416	Principal Place of Business	4/6/78	\$150.00
Receipt for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ 1150.00	6/30/78	\$1000.00
Full Name, Mailing Address and ZIP Code Thirty-Eighth Senate District 7300 Gallagher Drive Minneapolis, Mn. 55436	Principal Place of Business	5/16/78	\$ 50.00
Receipt for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ 50.00		
Full Name, Mailing Address and ZIP Code Thirty-Seventh District DFL 6225 Thomas Avenue South Minneapolis, Mn. 55419	Principal Place of Business	6/30/78	\$ 50.00
Receipt for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ 50.00		
Full Name, Mailing Address and ZIP Code UAW V Cap 8000 E. Jefferson Detroit, Michigan 48214	Principal Place of Business	4/24/78	\$5,000.00
Receipt for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ 5,000.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$		
SUBTOTAL of receipts this page (optional)			\$ 7250.00
TOTAL this period (last page this line number only)			\$ 8400.00

EXHIBIT A

A
1978
Election Commission
Street, N.W.
Washington, 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

Page 2 of 2 for

Line Number 15b

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full			
Freeman Volunteer Committee			
Full Name, Mailing Address and ZIP Code Political Education Committee Fund 750 Overton Drive NE Fridley, Mn. 55432	Principal Place of Business Occupation	Date (month, day, year) 8/23/78	Amount of each Receipt this Period \$50.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ 50.00		
Full Name, Mailing Address and ZIP Code Sheet Metal Workers' International Association P.A. League 1750 New York Avenue NW Washington, D.C. 20006	Principal Place of Business Occupation	Date (month, day, year) 8/23/78	Amount of each Receipt this Period \$300.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ 300.00		
Full Name, Mailing Address and ZIP Code Third District DFL Legislative Fund 4860 W. 39th Street Minneapolis, Mn. 55416	Principal Place of Business Occupation	Date (month, day, year) 8/23/78	Amount of each Receipt this Period \$1000.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ 2150.00		
Full Name, Mailing Address and ZIP Code I.L.G.W.U. Campaign Committee 1710 Broadway New York, N.Y. 10019	Principal Place of Business Occupation	Date (month, day, year) 8/25/78	Amount of each Receipt this Period \$500.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ 500.00		
Full Name, Mailing Address and ZIP Code IMPACE Box 17203 St. Paul, Mn. 55117	Principal Place of Business Occupation	Date (month, day, year) 8/25/78	Amount of each Receipt this Period \$3000.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ 3000.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$		
SUBTOTAL of receipts this page (optional)			\$ 4850.00
			\$ 8130.00

Lorraine Samson
7340 York Ave. S.
Edina, Minnesota 55435

RECEIVED
FEDERAL ELECTION
COMMISSION



OCT 2 AM 11:06

79040092111

The Honorable Joan D. Aikens, Chairman
Federal Election Commission
1325 K. Street Northwest
Washington, D.C. 20463

600#
5056

RECEIVED OCT 2 1978

September 26, 1978

18 OCT 2 AM 11:13

806629

The Honorable Joan D. Aikens, Chairman
Federal Election Commission
1325 K Street Northwest
Washington, D. C. 20463

Dear Chairman Aikens:

On August 29, 1978, I filed a complaint on behalf of the Frenzel Volunteer Committee and Congressman Bill Frenzel, Third District, Minnesota, against the Freeman for Congress Volunteer Committee alleging the acceptance of \$1,150 in primary contributions from the Third District DFL Committee. A copy of that complaint is attached as Exhibit A.

The Freeman for Congress Volunteer Committee in its pre-primary report, Schedule A, Page 2, line 15b, reported acceptance of an additional \$1,000 primary contribution from the Third District DFL Committee. A copy of that report is attached as Exhibit B.

I believe this to be in further violation of 2 U.S.C. Section 441 (a)(1)(A). Please include this additional information as part of the original file on this matter.

Sincerely,
LaVonne Samstad
LaVonne Samstad
7340 York Avenue South
Apartment 6-210
Edina, Minnesota 55435

cc: Lester W. Scall, Esq.
Enc1.

Subscribed and sworn to before me this

28th day of September, 1978.

Jo Ann F. Glomski
Notary Public

JO ANN F. GLOMSKI
Notary Public, Hennepin County, Minn.
My Commission Expires Dec. 2, 1982

August 29, 1978

79040092113
The Honorable Joan D. Aikens, Chairman
Federal Election Commission
1325 K Street Northwest
Washington, D.C. 20463

Dear Chairman Aikens:

Please find enclosed for the Commission's consideration
a Statement of Alleged Violation, which is herewith filed
against the Freeman for Congress Volunteer Committee.

If you need any further information from me, please let
me know.

Sincerely,

LaVonne Samstad
LaVonne Samstad

Enclosure

EXHIBIT A

STATEMENT OF ALLEGED VIOLATION

Pursuant to 2 U.S.C. Section 437g, LaVonne Samstad, being first duly sworn, on oath states that: This complaint is filed on behalf of the Frenzel Volunteer Committee, and Congressman Bill Frenzel, Third District, Minnesota, alleging the following violation of the Federal Election Campaign Act of 1971, as amended, by the Freeman for Congress Volunteer Committee:

The Freeman for Congress Volunteer Committee reported on its July 10, 1978 Quarterly Report, Schedule A, Page 2, line 15b, acceptance of \$1,150 in primary contributions from the Third District DFL Committee. A copy of that portion of the Freeman Committee report is attached as Exhibit A. The Third District DFL Committee registered with the Federal Election Commission as a political committee on April 17, 1972. Since the Third District DFL Committee is not a qualified multi-candidate committee, the Freeman for Congress Volunteer Committee has reported acceptance of an illegal contribution under 2 U.S.C. Section 441 (a)(1)(A).

The attached documentation of the acceptance of an illegal contribution is our grounds for believing that the Freeman for Congress Volunteer Committee has violated the Federal Election Campaign Act of 1971, as amended.

70040092114

Statement of Alleged Violation
Page 2

If the Commission agrees that there is reason to believe that a violation has occurred, we urge the Commission to investigate the matter and to take appropriate action.

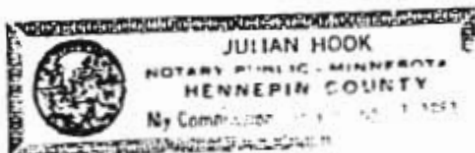
LaVonne Samstad

LaVonne Samstad
7340 York Avenue South
Apartment 6-210
Edina, Minnesota 55435

Subscribed and sworn to
before me this 30th day
of August, 1978.

Julian Hook

Notary Public



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

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

Page 2 of 2 for
 Line Number 15b

(Use Separate Schedules for
 each numbered line)

Name of Candidate or Committee in Full Michael O. Freeman for Congress Committee			
Full Name, Mailing Address and ZIP Code Minnesota Chiropractic P.A.C. 2092 E. 11th Avenue North St. Paul, MN. 55109	Principal Place of Business Occupation	Date (month, day, year) 6/30/78	Amount of each Receipt this Period \$500.00
Receipt for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ 500.00		
Full Name, Mailing Address and ZIP Code Railway Clerks, Political League 6300 River Rd. Rosemont, Illinois 60018	Principal Place of Business Occupation	Date (month, day, year) 6/30/78	Amount of each Receipt this Period \$500.00
Receipt for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ 500.00		
Full Name, Mailing Address and ZIP Code Third District DFL Legislative Fund 4860 W. 39th St. Mpls, MN. 55416	Principal Place of Business Occupation	Date (month, day, year) 4/6/78	Amount of each Receipt this Period \$150.00
Receipt for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ 1150.00	Date (month, day, year) 6/30/78	Amount of each Receipt this Period \$1000.00
Full Name, Mailing Address and ZIP Code Thirty-Eighth Senate District 7320 Gallagher Drive Minneapolis, Mn. 55436	Principal Place of Business Occupation	Date (month, day, year) 5/16/78	Amount of each Receipt this Period \$ 50.00
Receipt for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ 50.00		
Full Name, Mailing Address and ZIP Code Thirty-Seventh District DFL 6225 Thomas Avenue South Minneapolis, Mn. 55419	Principal Place of Business Occupation	Date (month, day, year) 6/30/78	Amount of each Receipt this Period \$ 50.00
Receipt for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ 50.00		
Full Name, Mailing Address and ZIP Code UAW V Cap 8000 E. Jefferson Detroit, Michigan 48214	Principal Place of Business Occupation	Date (month, day, year) 4/24/78	Amount of each Receipt this Period \$5,000.00
Receipt for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$5,000.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$		
SUBTOTAL of receipts this page (attach sheet)			\$ 7250.00
TOTAL this period (last page this line number only)			\$ 8500.00

EXHIBIT A

1978
Election Commission
Street, N.W.
Washington, 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

Page 2 of 2 for

Line Number 15b

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

Freeman Volunteer Committee

Full Name, Mailing Address and ZIP Code
Political Education Committee
750 Overton Drive NE
Fridley, Mn. 55432

Principal Place of Business
Fund

Occupation

Date (month,
day, year)

Amount of each Rec
this Period

8/23/78

\$50.00

Receipt for:

☒ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$ 50.00

Full Name, Mailing Address and ZIP Code

Sheet Metal Workers' International Association P.A. League
1750 New York Avenue NW
Washington, D.C. 20006

Principal Place of Business

Occupation

Date (month,
day, year)

Amount of each Rec
this Period

8/23/78

\$300.00

Receipt for:

☒ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$ 300.00

Full Name, Mailing Address and ZIP Code

Third District DFL Legislative Fund
4860 W. 39th Street
Minneapolis, Mn. 55416

Principal Place of Business

Occupation

Date (month,
day, year)

Amount of each Rec
this Period

8/23/78

\$1000.00

Receipt for:

☒ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$ 2150.00

Full Name, Mailing Address and ZIP Code

I.L.G.W.U. Campaign Committee
1710 Broadway
New York, N.Y. 10019

Principal Place of Business

Occupation

Date (month,
day, year)

Amount of each Rec
this Period

8/25/78

\$500.00

Receipt for:

☒ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$ 500.00

Full Name, Mailing Address and ZIP Code

IMPACE
Box 17203
St. Paul, Mn. 55117

Principal Place of Business

Occupation

Date (month,
day, year)

Amount of each Rec
this Period

8/25/78

\$3000.00

Receipt for:

☒ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$ 3000.00

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,
day, year)

Amount of each Rec
this Period

Receipt for:

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,
day, year)

Amount of each Rec
this Period

Receipt for:

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$

SUBTOTAL of receipts this page (optional) \$ 4850.00

Wenne Saasted
340 York Ave. S.
Edina, MN 55435

FEDERAL ELECTION
COMMISSION



'78 OCT 2 AM 11:12

79040092118

Lester N. Scall, Esq.
Assistant General Counsel
Federal Election Commission
1325 K Street NW
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION

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

September 7, 1978

LaVonne Samstad
7340 York Avenue South
Apartment 6-210
Edina, Minnesota 55435

Dear Ms. Samstad:

This is to acknowledge receipt of your complaint of August 29, 1978, alleging violations of the Federal Election Campaign Laws. A staff member has been assigned to analyze your allegations and a recommendation to the Federal Election Commission as to how this matter should be handled will be made shortly. You will be notified as soon as the Commission determines what action should be taken. For your information, we have attached a brief description of the Commission's preliminary procedures for the handling of complaints.

Sincerely yours,

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

Lester N. Scall
Assistant General Counsel

RECEIVED
FEDERAL ELECTION

4785

August 29, 1978

'78 SEP 5 AM 10:13

885974

The Honorable Joan D. Aikens, Chairman
Federal Election Commission
1325 K Street Northwest
Washington, D.C. 20463

Dear Chairman Aikens:

Please find enclosed for the Commission's consideration
a Statement of Alleged Violation, which is herewith filed
against the Freeman for Congress Volunteer Committee.

If you need any further information from me, please let
me know.

Sincerely,

LaVonne Samstad
LaVonne Samstad

Enclosure

02160006

STATEMENT OF ALLEGED VIOLATION

Pursuant to 2 U.S.C. Section 437g, LaVonne Samstad, being first duly sworn, on oath states that: This complaint is filed on behalf of the Frenzel Volunteer Committee, and Congressman Bill Frenzel, Third District, Minnesota, alleging the following violation of the Federal Election Campaign Act of 1971, as amended, by the Freeman for Congress Volunteer Committee:

The Freeman for Congress Volunteer Committee reported on its July 10, 1978 Quarterly Report, Schedule A, Page 2, line 15b, acceptance of \$1,150 in primary contributions from the Third District DFL Committee. A copy of that portion of the Freeman Committee report is attached as Exhibit A. The Third District DFL Committee registered with the Federal Election Commission as a political committee on April 17, 1972. Since the Third District DFL Committee is not a qualified multi-candidate committee, the Freeman for Congress Volunteer Committee has reported acceptance of an illegal contribution under 2 U.S.C. Section 441 (a)(a)(1)(A).

The attached documentation of the acceptance of an illegal contribution is our grounds for believing that the Freeman for Congress Volunteer Committee has violated the Federal Election Campaign Act of 1971, as amended.

70040992121

Statement of Alleged Violation
Page 2

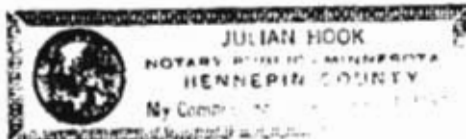
If the Commission agrees that there is reason to believe that a violation has occurred, we urge the Commission to investigate the matter and to take appropriate action.

LaVonne Samstad

LaVonne Samstad
7340 York Avenue South
Apartment 6-210
Edina, Minnesota 55435

Subscribed and sworn to
before me this 30th day
of August, 1978.

Julian Hook
Notary Public



ITEMIZED RECEIPTS

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

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

Page 2 of 2 for

Line Number 15b

(Use Separate Schedules for
 each numbered line)

Name of Candidate or Committee in Full Michael O. Freeman for Congress Committee			
Full Name, Mailing Address and ZIP Code Minnesota Chiropractic P.A.C. 2092 E. 11th Avenue North St. Paul, MN. 55109	Principal Place of Business Occupation	Date (month, day, year) 6/30/78	Amount of each Receipt this Period \$500.00
Receipt for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Railway Clerks, Political League 6300 River Rd. Rosemont, Illinois 60018	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ 500.00 Principal Place of Business Occupation	Date (month, day, year) 6/30/78	Amount of each Receipt this Period \$500.00
Receipt for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Third District DFL Legislative Fund 4860 W. 39th St. Mpls, MN. 55416	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ 500.00 Principal Place of Business Occupation	Date (month, day, year) 4/6/78	Amount of each Receipt this Period \$150.00
Receipt for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Thirty-Eighth Senate District 7000 Gallacher Drive Minneapolis, Mn. 55436	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ 1150.00 Principal Place of Business Occupation	Date (month, day, year) 6/30/78	Amount of each Receipt this Period \$1000.00
Receipt for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Thirty-Seventh District DFL 6021 Thomas Avenue South Minneapolis, Mn. 55419	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ 50.00 Principal Place of Business Occupation	Date (month, day, year) 5/16/78	Amount of each Receipt this Period \$ 50.00
Receipt for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code UAW V Cap 8000 E. Jefferson Detroit, Michigan 48214	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ 50.00 Principal Place of Business Occupation	Date (month, day, year) 6/30/78	Amount of each Receipt this Period \$ 50.00
Receipt for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code 	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$5,000.00 Principal Place of Business Occupation	Date (month, day, year) 4/24/78	Amount of each Receipt this Period \$5,000.00
Receipt for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code 	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Occupation	Date (month, day, year) 	Amount of each Receipt this Period
SUBTOTAL of receipts this page (optional)			\$ 7250.00
TOTAL of 15 periods (all pages this line number only)			\$ 8500.00

EXHIBIT A

LaVonne Samstad
7340 York Avenue South
Apartment 6-210
Edina, Minnesota 55435

0 0 1 0 0 9 2 1 4

The Honorable Joan D. Aikens, Chairman
Federal Election Commission
1325 K Street Northwest
Washington, D.C. 20463

MINNEAPOLIS
AUG 31
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PM 3

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FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 701

Date Filmed 1/25/79 Camera No. --- 2

Cameraman GPC