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# FEDERAL ELECTION COMMISSION

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WASHINGTON, D.C. 20463

May 23, 1980

# CERTIFIED MAIL RETURN RECEIPT REQUESTED

Marion Edwyn Harrison, Esquire BARNETT, ALAGIA AND CAREY 1627 K Street, N.W. Washington, D.C. 20006

Re: MUR 960; Life Amendment
Political Action Committee,

Inc.

Dear Mr. Harrison:

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This letter is to acknowledge the receipt of your client's check for \$100 to the United States Treasury as a civil penalty in the settlement of MUR 960. Accordingly, the Commission has closed its file regarding this matter.

As the Commission informed you in its letter of April 30, 1980, this matter will become a part of the public record in thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without written consent of the respondent and the Commission. As no such consent exists to date, these materials will remain confidential.

Sincerel

General Counsel

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W	ith Express Advocacy	Cha	st of
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WASHINGTON, D. C.



WASHINGTON, D.C. 20463

April 30, 1980



CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Marion Edwyn Harrison Attorney at Law Barnett, Alagia and Carey 1627 K Street, N.W. Washington, D.C. 20006

507989

Re: MUR 960; Life Amendment Political Action Committee, Inc.

Dear Mr. Harrison:

On April 28 1980, the Commission accepted the conciliation agreement signed by you on behalf of your client in the settlement of a violation of 2 U.S.C. § 44ld. Accordingly, the file will be closed in this matter upon the Commission's receipt of the civil penalty. This matter will become a part of the public record thirty days after the file is closed. However, 2 U.S.C. § 437g(a) (4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely

Charles N. Steele General Counsel

Enclosure

Conciliation Agreement

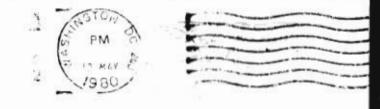
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# BARNETT, ALAGIA & CAREY

1627 K STREET, NW

WASHINGTON, D.C. 20006



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



WASHINGTON, D.C. 20463

April 30, 1980

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Marion Edwyn Harrison Attorney at Law Barnett, Alagia and Carey 1627 K Street, N.W. Washington, D.C. 20006

> Re: MUR 960; Life Amendment Political Action Committee, Inc.

Dear Mr. Harrison:

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

Sincerely

Charres W. Steele

General Counsel

Enclosure

Conciliation Agreement

600#1051

#### BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)		
	)	MUR 960	
Lite Amendment Political	)		907463
Action Committee Inc.	)		

#### CONCILIATION AGREEMENT

This matter having been initiated by a signed, sworn, and notarized complaint by the National Abortion Rights Action League, an investigation having been conducted, and reasonable cause to believe having been found that Life Amendment Political Action Committee, Inc., ("Respondent") violated 2 U.S.C. §441d by making expenditures for communications expressly advocating the election of clearly identified federal candidates without properly displaying statements of authorization/non-authorization by candidates endorsed.

NOW, THEREFORE, the Commission and Respondent, having duly entered into conditiation pursuant to 2 U.S.C. \$437g(a)(5), do hereby agree as follows:

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- The Commission has jurisdiction over the Respondent and the subject matter of this proceeding.
- II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter:
- III. Respondent enters voluntarily into this Agreement with the consister of USV 01
  - IV. The pertinent facts in this matter are as follows:

1 ...

- A. LAPAC, Inc., paid for the publication and distribution of three general public communications which expressly advocate the election of clearly identified federal candidates.
- B. The communications at issue did not contain a notice of candidate authorization/non-authorization as required by law.
- C. The distribution of said communications exceeds 15,000 copies.

## WHEREFORE, Respondent agrees:

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- V. LAPAC, Inc., did not consult counsel prior to taking the steps described in ¶IV above; LAPAC, Inc., intended no violation of the law; but LAPAC, Inc., admits that LAPAC, Inc., is in violation of 2 U.S.C. §441d by having made expenditures for communications expressly advocating the election of clearly identified federal candidates without including statements of authorization/non-authorization by those candidates endorsed.
- VI. Pespondent will pay a civil penalty to the Treasurer of the United States in the amount of \$100 pursuant 2 U.S.C. \$437g(a)(6)(B).
- VII. Respondent will not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. §431, et seg.

## GENERAL CONDITIONS

- VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.
  - IX. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.
    - X. It is agreed that respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirement contained in §VI of this agreement and to so notify the Commission.

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April 12, 1880

Charles N. Steele

General Counsel

Federal Election Commission

Marion Edwyn Harrison

Attorney for Life Amendment Political Action Committee, Inc. CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Marion Edwyn Harrison Attorney at Law Barnett, Alagin and Carey 1627 K Street, N.W. Washington, D.C. 20006

> Re: MUR 960; Life Amendment Political Action Committee, Inc.

Dear Mr. Harrison:

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On April , 1980, the Commission accepted the conciliation agreement signed by you on behalf of your client in the settlement of a violation of 2 U.S.C. § 44ld. Accordingly, the file will be closed in this matter upon the Commission's receipt of the civil penalty. This matter will become a part of the public record thirty days after the file is closed. However, 2 U.S.C. § 437g(a) (4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles W. Steele General Counsel

Enclosure

Conciliation Agreement

jus!



WASHINGTON, D.C. 20463

May 16, 1980

Memo

To:

MUR FILE 960

From:

Carolyn Weeder ('ACW

Re:

Resending letter to Complainant notifying of

closing of MUR 960

10

The letter addressed to Gail M. Harmon, Esquire notifying of the closing of MUR 960 was returned to the Commission with the explanation of "Moved, not forwardable." A recent address was obtained, therefore the letter is to be resent.

FEDERAL ELECTION COMMISSION

Official Business

Penalty for Private Use \$300

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No such number

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Addressee unknown

S S S

Ms. Sail M. Harmon Attorney at Law Sheldon, Harmon, Roisman and Weiss 1025 15th Street, N.W., Suite 500 Washington, S.C. 20005

CERTIFIE 944682

POSTAGE AND FEES PAID



WASHINGTON, D.C. 20463

April 30, 1980

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Ms. Gail M. Harmon Attorney at Law Sheldon, Harmon, Roisman and Weiss 1025 15th Street, N.W., Suite 500 Washington, D.C. 20005

Re: MUR 960

Dear Ms. Harmon:

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This is in reference to the complaint you filed with the Commission on April 30, 1979 concerning the Life Amendment Political Action Committee, Incorporated ("LAPAC, Inc.").

After conducting an investigation in this matter, the Commission determined there was reasonable cause to believe that LAPAC, Inc. violated a provision of the Federal Election Campaign Act of 1971, as amended. On April 28, 1980 a conciliation agreement signed by the respondent was accepted by the Commission, thereby concluding the matter. A copy is enclosed for your information.

The file number in this matter is MUR 960. If you have any questions, please contact Carolyn Weeder, the staff member assigned to this matter, at (202)523-4529.

Sincerely,

Charles N. Steel General Counsel

Enclosure

Conciliation Agreement

CERTIFIED MAIL RETURN RECEIPT REQUESTED Ms. Gail M. Harmon Attorney at Law Sheldon, Harmon, Roisman and Weiss 1025 15th Street, N.W., Suite 500 9 Washington, D.C. 20005 Re: MUR 960 Dear Ms. Harmon: This is in reference to the complaint you filed with the C Commission on April 30, 1979 concerning the Life Amendment Political Action Committee, Incorporated ("LAPAC, Inc."). After conducting an investigation in this matter, the Commission determined there was reasonable cause to believe that LAPAC, Inc. violated a provision of the Federal Election 0 Campaign Act of 1971, as amended. On April , 1980 a 3 conciliation agreement signed by the respondent was accepted by the Commission, thereby concluding the matter. A copy is enclosed for your information. The file number in this matter is MUR 960. If you have any questions, please contact Carolyn Weeder, the staff member assigned to this matter, at (202)523-4529. Sincerely, Charles N. Steele General Counsel Enclosure Conciliation Agreement

#### BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 960
Life Amendment Political	)	
Action Committee, Inc.	)	

#### CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on April 28, 1980, the Commission decided by a vote of 6-0 to take the following actions regarding MUR 960:

- 1. Accept the conciliation agreement as attached to the Memorandum to Commission dated April 24, 1990.
- 2. Close the File.
- 3. Approve and send the letter to Marion Harrison, counsel for respondent LAPAC, Inc., (Attachment to the above-named memorandum).
- 4. Approve and send the letter to Gail Harmon, counsel for complainant National Abortion Rights Action League, (Attachment to the above-named memorandum.)

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

Attest:

Marjoric M. Emmons Secretary to the Commission

Received in Office of the Commission Secretary: 4-24-80, 10:04 Circulated on 48 hour vote basis: 4-24-80, 4:00

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WASHINGTON, D.C. 20463

November 7, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Jeanette Smith 606 E. Tallent Rapid City, S.D. 57701

RE: MUR 960

Dear Ms. Smith:

C

An investigation undertaken by the Federal Election Commission indicates that you took actions in connection with the November, 1978 federal election which were in violation of 2 U.S.C. §44ld(2) of the Federal Election Campaign Act. This provision states:

Whenever any person makes an expenditure for the purpose of financing communications expressly advocating the election or defeat of a clearly identified candidate through any broadcasting station, newspaper, magazine, outdoor advertising facility, direct mailing, or any other type of general public political advertising, such communication —

(2) if not authorized by a candidate, his authorized political committees, or their agents, shall clearly and conspicuously, in accordance with regulations prescribed by the Commission, state that the communication is not authorized by any candidate, and state the name of the person who made or financed the expenditure for the communication, including, in the case of a political committee, the name of any affiliated or connected organization required to be disclosed under section 433(b)(2).

The investigation showed that while you paid for the publication of advertisements in the Rapid City Guide and The Rapid City Journal, these advertisements stated that they were "paid for" by the Life Amendment Political Action Committee of South Dakota. In order to comply with 2 U.S.C. §44ld you would have had to indicate that you or your local group "paid for" the publication of the advertisement, as well as stating whether or not the publication was authorized by a candidate.

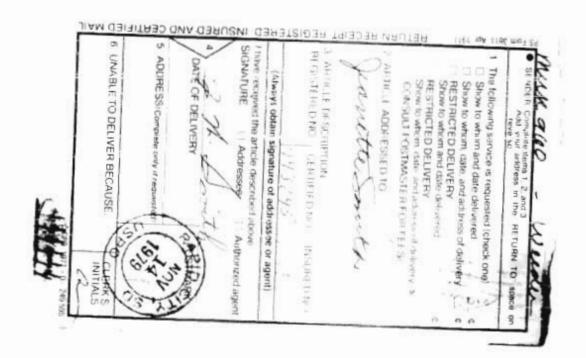
Jeannette Smith Page 2

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However, in view of the small amount of money involved and the apparently limited circulation of the publication, the Commission has decided to terminate its investigation without taking official action against you. This letter is to put you on notice that you have apparently acted in violation of the Federal Election Campaign Act and that you should be careful to abide by the provisions of that Act in order to avoid future Commission proceedings against you.

Charles General Counsel



CERTIFIED MAIL RETURN RECEIPT REQUE

Mg. Jeanette Smith 606 E. Tallent Rapid City, S.D. 5770

Dear Ms. Smith

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Jeannette Smith Page 2 However, in view of the small amount of money involved and the apparently limited circulation of the publication, the Commission has decided to terminate its investigation without taking official action against you. This letter is to put you on notice that you have apparently acted in violation of the Federal Election Campaign Act and that you should be careful to abide by the provisions of that Act in order to avoid future Commission proceedings against Sincerely, Charles N. Steele Acting General Counsel



WASHINGTON, D.C. 20463

November 7, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James R. Becker Counselor at Law 412 West Ninth Street P.O. Box 1443 Sioux Falls, South Dakota 57104

> RE: MUR 960 LAPAC, S.D.

Dear Mr. Becker:

On November 1, 1979, the Commission found no reasonable cause to believe that LAPAC, S.D. violated 2 U.S.C. §441d by making expenditures expressly advocating the election of clearly identified federal candidates without statements of authorization/non-authorization by candidates endorsed.

After reviewing the available information, the Commission determined that it appeared that local pro-life groups in South Dakota used LAPAC, S.D.'s disclaimer without authorization in publications expressly advocating the election of clearly identified federal candidates without including statements of authorization/non-authorization by these candidates endorsed. The Commission has determined that LAPAC, S.D. shall not be held liable for the unauthorized use of a disclaimer notice attributed to it.

Accordingly, LAPAC, S.D's involvement in this matter has been terminated. Should further information come to your attention which you believe is relevant to the Commission's analysis of this matter, please contact Carolyn Weeder at (202) 523-452%.

Charles N. Steele

Acting General Counsel

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3. ARTICLE DESCRIPTION REGISTERED NO CORTIFIED NO (Always obtain signature of addressee	INSURED NO.
I have received the article described above	uthorized agen
5 ADDRESS/Complete only if requested)	

CERTIFIED MAIL RETURN RECEIPT REQUEST Mr. James R. Becker Counselor at Law 412 West Ninth Street P.O. Box 1443 Sioux Falls, South Dakota 57104 LAPAC, S.D. Dear Mr. Becker: 0 On November 1, 1979, the Commission found no reasonable cause to believe that LAPAC, S.D. violated 2 U.S.C. §441d by making expenditures expressly advocating the election of clearly identified federal candidates without statements of authorization/non-authorization by candidates endorsed. After reviewing the available information, the Commission determined that it appeared that local pro-life groups in South Dakota used LAPAC, S.D.'s disclaimer without authorization in publications expressly advocating the election of clearly identified federal candidates without including statements of authorization/non-

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Sincerely,

Charles N. Steele Acting General Counsel



WASHINGTON, D.C. 20463

November 7, 1979

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Marion Edwyn Harrison Barnett, Alagia and Carey 1627 K Street, N.W. Washington, D.C. 20006

RE: MUR 960

Dear Mr. Harrison:

. >

On November 1, 1979, the Commission determined there was reasonable cause to believe that your client, Life Amendment Political Action Committee, Inc. committed a violation of 2 U.S.C. section 441d of the Federal Election Campaign Act of 1971, as amended. Specifically, the Commission found reasonable cause to believe that LAPAC, INC. violated 2 U.S.C. \$441d by making expenditures for communications expressly advocating the election of clearly identified federal candidates without properly displaying statements of authorization/ron-authorization by candidates endorsed.

In addition, the Commission determined to take no further action concerning LAPAC, Inc.'s possible violation of 2 U.S.C. \$434 by failing to report the liquidation of a debt, and to take no further action in this matter regarding LAPAC, INC.'s failure to report LAPAC, S.D. and/or other local pro-life committees as affiliated organizations

The Commission has a duty to attempt to correct the above described violation of 2 U.S.C. §441d for a period of 30 days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. 2 U.S.C. section 437g(a)(5)(A). If we are unable to reach an agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute a civil suit in United States District Court and seek payment of a civil penalty.

Mr. Marion Edwyn Harrison Page 2 Enclosed is a conciliation agreement that this office is prepared to recommend to the Commission in settlement of this If you agree with the provisions of the enclosed agreement, please sign and return it along with the civil penalty to the We will then recommend that the Commission within ten days. Commission approve the agreement. If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Carolyn Weeder, the staff member assigned to this matter, at 202/523-4529. Sincer Acting General Counsel Enclosure Conciliation Agreement C RETURN RECEIPT REGISTERED, INSURED AND CERTIFIED MAIL C REGISTERED NO have received the article described above ARTICLE DESCRIPTION ARTICLE ADDRESSED TO he following service is requested (check one UNABLE TO DELIVER BECAUSE RESTRICTED DELIVERY
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#### CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Marion Edwyn Harrison Barnett, Alagia and Carey 1627 K Street, N.W. Washington, D.C. 20066

RE: MUR 960

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WASHINGTON, D.C. 20463

November 7, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kevin Conner 2719 Elm Avenue Rapid City, South Dakota 57701

RE: MUR 960

Dear Mr. Conner:

C

An investigation undertaken by the Federal Election Commission indicates that you took actions in connection with the November, 1978 federal election which were in violation of 2 U.S.C. §441d(2) of the Federal Election Campaign Act. This provision states:

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The investigation indicated that while you paid for the publication of a handbill distributed in your local area, you had printed upon this publication that it was "sponsored by" the Life Amendment Political Action Committee (LAPAC). In order to comply with 2 U.S.C. §44ld you would have had to indicate that you or your local group "sponsored" the publication of the handbill.

Kevin Conner Page 2

C

However, in view of the small amount of money involved and the apparently limited circulation of the publication, the Commission has decided to terminate its investigation without taking official action against you. This letter is to put you on notice that you have apparently acted in violation of the Federal Election Campaign Act and that you should be careful to abide by the provisions of that Act in order to avoid future Commission proceedings against you.

Charles N. Steele Acting General Counsel



CERTIFIED MAIL RETURN RECEIPT REQUESTED

Revin Conner 2719 Elm Avenue Rapid City, South Dakota 57701

RE: MUR 960

Dear Mr. Conner:

9

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Just

Kevin Conner Page 2

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Sincerely,

Charles N. Steele Acting General Counsel

#### BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	
Life Amendment Political )	
Action Committee, Inc. )	MUR 960
and )	
Life Amendment Political )	
Action Committee, South)	
Dakota )	

#### CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on November 1, 1979, do hereby certify that the Commission determined by a vote of 5-0 to take the following actions in MUR 960:

C

- Take no further action concerning LAPAC, Inc.'s possible violation of 2 U.S.C. §434 by failing to report the liquidation of a debt.
- Find reasonable cause to believe that LAPAC, Inc.
  violated 2 U.S.C. §44ld by making expenditures for
  communications expressly advocating the election of
  clearly identified federal candidates without
  including required statements of authorization/
  non-authorization by these candidates endorsed, and
  enter into conciliation.
- 3. Find no reasonable cause to believe that LAPAC, S. D. violated 2 U.S.C. §441d by making expenditures for communications expressly advocating the election of clearly identified federal candidates without including required statements of authorization/non-authorization by those candidates endorsed.
- 4. Take no further action in this MUR regarding LAPAC, Inc.'s possible violation of 2 U.S.C. §434 by failing to report LAPAC, S. D. and/or other local pro-life committees as affiliated organizations.

 Approve the letters attached to the General Counsel's October 15, 1979 report, as amended during the Executive Session of November 1, 1979.

Attest:

11-5-19

Date

marjarie W. Enemons

Marjorie W. Emmons Secretary to the Commission



### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM:

MARJORIE W. EMMONS/MARGARET CHANEY

DATE:

OCTOBER 25, 1979

SUBJECT:

COMMENTS REGARDING MUR 960 General Counsel's

Report dated 10-15-79

Attached is a copy of Commissioner Aikens'

vote sheet with comments regarding MUR 960.





# FEDERAL ELECTION COMMISSION

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

0CT

Date and Time Transmitted: 10-22-7.93, 4:00

Commissioner FRIEDERSDORF, TIERNAN, MCGARRY, REICHE, HARRI

RETURN TO OFFICE OF COMMISSION SECRETARY BY: OCTOBER 24, 1979 - 4:00

MUR No. 960 - General Counsel's Report dated 10-15-79

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

Concellation agreement should not include

LAPAC-SD in heading since in ECTB was from

Date: 10-24-79 Signature: Thukens

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





#### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM:

MARJORIE W. EMMONS/MARGARET CHANEY

DATE:

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OCTOBER 24, 1979

SUBJECT:

MUR 960 - General Counsel's Report dated 10-15-79; Received in OCS 10-22-79,

9:42

The above-named document was circulated on a 48 hour vote basis at 4:00, October 22, 1979.

Commissioner Friedersdorf submitted an objection at 1:45, October 24, 1979, thereby placing MUR 960 on the Executive Session Agenda for November 1, 1979.

October 22, 1979

MEMORANDUM TO:

Marge Emons

FROM :

Jane colgrove

SUBJECT:

MUR 960

Please have the stachadd General Counsel's Report on MUR 960 distributed to the Commission on a 48 hour tally basis.

Thank you

RECEIVED OFFICE OF THE POMMISSION SECRETARY

#### BEFORE THE FEDERAL ELECTION COMMISSION

79 DCT22 A9: 42

	)		
In the Matter of	)		
	)		
Life Amendment Political	)	MUR	960
Action Committee, Inc.	)		
and	)		
Life Amendment Political	)		
Action Committee, South Dakot	a )		

# GENERAL COUNSEL'S REPORT

# I. Background/Previous Commission Action

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The National Abortion Rights Action League filed a complaint alleging that the Life Amendment Political Action Committee, South Dakota (LAPAC, S.D.) and/or the Life Amendment Political Action Committee, Inc. (LAPAC, INC.) violated certain FECA provisions.

On June 27, 1979, the Commission made the following determinations:

- A. Reason to believe that Life Amendment Political Action Committee, Inc. may have violated 2 U.S.C. §434 by failing to report the liquidation of a debt;
- B. Reason to believe that LAPAC, Inc. and LAPAC, S.D. may have violated 2 U.S.C. §441d, 11 C.F.R. §110.11 by making expenditures for communications expressly advocating the election of clearly identified federal candidates without including the required statements of authorization/non-authorization by those candidates;
- C. Reason to believe that LAPAC, Inc. may have violated 2 U.S.C. §433 by failing to report LAPAC, S.D. and/or other pro-life committees as affiliated organizations in its statement of organization.

The evidence from the investigation of these possible violations and the conclusions derived therefrom are provided below.

-2-

# II. Legal Analysis

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A. LAPAC, Inc's Failure To Report The Liquidation OF A Debt

LAPAC, Inc. reported a debt to Harold's Printing Company on its 1978 30-day General Report which was not continuously reported in its 1978 Year-End Report pursuant to 2 U.S.C. \$434 and 11 C.F.R. \$104.8(a). The Reports Analysis Division sent an RFAI in April 1979 regarding the committee's failure to carry forward the debt in its Year-End Report. The reporting error was rectified soon thereafter. In light of the fact that LAPAC, Inc. timely complied with the RFAI, as well as having originally reported the debt, and in consideration that the reporting error was corrected prior to the filing of the complaint, the Office of the General Counsel recommends that no turther action be taken concerning LAPAC, Inc.'s possible violation of 2 U.S.C. \$434 for failure to report the liquidation of a debt.

B. LAPAC, Inc. and LAPAC, S.D.'s Failure to Include Required Disclaimers on Express Advocacy Communications

As discussed in the First General Counsel's Report
(June 27, 1979), four communications submitted by Complainant
as Exhibits C and C-b published by LAPAC, Inc. and Exhibit B
and D apparently published by LAPAC, S.D. appear to be examples
of express advocacy which do not display the disclaimer required
by 2 U.S.C. §441d. Interrogatory responses from both respondents
regarding this issue are discussed herein.

<sup>1/ 2</sup> U.S.C. §434(c) exempts debts previously reported from the need to be carried forward (11 C.F.R. §104.8(a)) only in the circumstance where there has been no change in the total debts and obligations from one report to the other.

-3-

# 1) LAPAC, Inc.

LAPAC, Inc. acknowledges that it paid for the publication and distribution of Exhibits C, C-b and an additional publication, 2/
Exhibit E. As discussed in the First General Counsel's Report, Exhibits C and C-b specifically identify federal candidates who support pro-life issues along with the following language:

LAPAC - Endorses and urges your support of the following Pro-Life candidates to the House and Senate of the United States on November 7, 1978:

and

THIS LITTLE GUY WANTS YOU TO VOTE

VOTE FOR HIS LIFE

NOVEMBER 7

and

VOTE FOR THE UNBORN

THERE IS A DIFFERENCE!

and

VOTE PRO-LIFE TUESDAY, NOV. 7, 1978

Furthermore, the additional communication paid for by LAPAC, Inc. submitted in response to interrogatories is also a clear example of express advocacy.

Exhibit E states "Vote for the unborn - VOTE THORSNESS - November 7, 1978."

2/ See Attached Exhibits

3

2 U.S.C. §441d requires that such communications include statements of authorization/non-authorization by those candidates endorsed. LAPAC, Inc.'s aforementioned communications fail to include the said required disclaimer.

In response to possible violation of §441d, LAPAC, Inc., neither denies nor refutes that LAPAC, Inc.'s publications in question are examples of express advocacy. Instead, LAPAC Inc.'s contentions are based on two grounds which it claims exempt the communications from the requirements specified in §441d.

First, LAPAC, Inc. argues that the publications are in fact "handbills" which are excluded from \$441d requirements, evident by the omission of "handbills" within the statutory language.

Express advocacy communications are defined in 11 C.F.R. \$110.11(a)(1) which states:

§110.11 Communications; advertising.

(a)(1) Whenever any person makes an expenditure for the purpose of financing communications expressly advocating the election or defeat of a clearly identified candidate through any broadcasting station, newspaper, magazine, outdoor advertising facility, direct mailing, or any other type of general public political adverstising, but not on a bumper strip, pin, button, pen and similar small items upon which the disclaimer cannot be conveniently printed, the communication -- ...

<sup>3/</sup> See Attachment 1.

The exemption to the very broad coverage afforded the regulatory definition of "communication" in 11 C.F.R. §110.11(a)(1) is limited to "small items upon which the disclaimer cannot be conveniently printed ..." The handbills, because of their size, do not fall into the "small item" category and therefore clearly fall within the category, "any other type of general public advertising."

LAPAC, Inc.'s second contention is that the said handbills are personal communications rather than general public political advertisements and are thus exempt from the \$441d disclaimer requirements. This argument seems weak in light of the fact that the distribution of the handbills exceeds 15,000. Such a distribution shows that the communications are general public advertisements as opposed to personal correspondence, and thus, the communications are not exempt from Section 441d provisions.

The Office of General Counsel therefore recommends a finding of reasonable cause to believe that LAPAC, Inc. violated 2 U.S.C. \$441d and 11 C.F.R. \$110.11(a)(1), and enter into conciliation.

#### LAPAC, S.D.

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Investigation of LAPAC, S.D.'s possible violation of 2 U.S.C. §441d reveals that LAPAC, S.D. apparently neither paid for nor authorized the use of its name on Exhibits B and D of the original complaint.

-6-Exhibits B and D expressly advocate the election of clearly identified federal candidates and indicate that LAPAC, S.D. "paid for" and "sponsored" their publication. The following language appears on Exhibit B: This ad written, or ordered and paid for by LAPAC-S.D. (Life Amendment Political Action Committee, White, S.D. 57276, Ellen Dempsey, Treas.) The statement "Sponsored by LAPAC (Life Amendment Political Action Committee), Hq. White, S.D." appears on Exhibit D. Initially, LAPAC, S.D. responses to interrogatories appeared to contradict the language contained in Exhibits B and D. example, its responses state that "no federal candidates were endorsed in flyers or brochures paid for by (LAPAC, S.D.) Life C Amendment Political Action Committee, South Dakota, ...," and that "no expenses were incurred in the preparation and distribution of any communications relating to a federal election" by LAPAC, S.D., and that "no brochures were printed or distributed by C (LAPAC, S.D.) which mentioned in any manner the names of any candidates for federal office ..." A letter was sent to LAPAC, S.D. requesting an explanation for the contradictions between these responses and the language which appears on Exhibits B and D. 4/ See Attachment 2.

-7-LAPAC, S.D. responded that the disclaimer was used in both advertisements by local pro-life groups of Rapid City, South Dakota without the authorization or knowledge by Ellen Dempsey, the sole officer of LAPAC, S.D. and that the exhibits had been overlooked when responding to interrogatories. The Commission received affidavits from Ellen Dempsey of LAPAC, S.D. and from Jeanette Smith and Kevin Conner, representing two Rapid City area groups. The three affidavits confirm that Jeanette Smith paid for the publication of Exhibit B, that Kevin LC: Conner paid for Exhibit D, and that both persons used LAPAC, S.D.'s disclaimer without Ellen Dempsey's authorization or knowledge.  $\frac{5}{}$ The Office of General Counsel therefore recommends a finding of no reasonable cause to believe that LAPAC, S.D. violated 2 U.S.C. \$441d. From the information submitted in the affidavits, it now appears that Jeanette Smith and Kevin Conner, representing Rapid City pro-life persons, may have violated 2 U.S.C. §441d. The expenditures incurred for the publications are reported as being \$140.00 by Jeanette Smith's group and \$40.00 by Kevin Conner's group. Exhibit B appeared in The Rapid City Guide and The Rapid City Journal a total of four times. Exhibit D was hand distributed by Kevin Conner and other local pro-life youth. 5/ See Attachment 3.

-8-In light of the fact that the expenditures for these publications are minimal and that the circulation is limited, the Office of General Counsel recommends that the Commission take no action with respect to a violation of 2 U.S.C. §441d by the Rapid City, S.D. pro-life groups. LAPAC, Inc.'s Failure To Include LAPAC, S.D. As An Affiliated At issue is whether LAPAC, Inc. violated 2 U.S.C. §434 by failing to report LAPAC, S.D. as an affiliated organization on its statement of organization. 5 LAPAC, Inc. claims to have no relationship with LAPAC, S.D. 9 LAPAC, Inc. states that it has neither provided nor received any C administrative or financial assistance from LAPAC, S.D. or other pro-life groups, except for the Pro-Life Action Council of Iowa, which is the focus of MUR 885. LAPAC, S.D. also claims to have no administrative or financial relationship with LAPAC, Inc. There is not sufficient evidence to establish affiliation between LAPAC, S.D. and LAPAC, Inc.; and yet there is evidence of some coordination and, possibly, control. For example, the name of the sole officer of LAPAC, S.D., Ellen Dempsey, repeatedly appears on LAPAC, Inc.'s publications endorsing South Dakota's federal pro-life candidates. In addition, references have been made in the affidavits from Ellen Dempsey and Jeanette Smith 6/ Sec Attachment 1, Response to Interrogatory 4.

-9that the function of LAPAC, S.D. was to disseminate election information on the state level and that the national LAPAC group was to handle dissemination of election information on the federal level. The following reference was made in Ellen Dempsey's affidavit: That your Affiant advised pro-life people in various parts of South Dakota of the organization and existence of LAPAC-SD and of the fact that its activities were limited to candidates for public office on a state or local level only through mailings, handouts and by personal conversation; and that any political activity on behalf of candidates for public office on a national level were to be handled by and through an independent organization known as Life Amendment Political Action Committee with headquarters in Washington, D.C. 7/ C Ms. Dempsey specifically advised numerous local pro-life persons to contact LAPAC, Inc. for federal political activities as opposed to any other national pro-life group. Jeanette Smith makes the same reference to LAPAC, Inc. as C being the "national" committee of the LAPAC, S.D.: We believed that any such advertisement had to be run over the name of LAPAC, SD, but we were not aware that LAPAC-SD was involved only in the dissemination of views of candidates for public office on the state and local level and was not involved in the dissemination of views of candidates for public office on a national level. Not until after the advertisement marked Exhibit 1 had been run did we become aware of the fact that any dissemination of candidates' views concerning abortion for national public office was required to be done by Life Amendment Political Action Committee and not LAPAC-SD. 8/ 7/ Attachment 3, Page 4. 8/ Attachment 3, Page 6.

Although the above described evidence is not in itself sufficient to determine affiliation, it appears to warrant further consideration. For this reason, the Office of General Counsel recommends to take no further action in this MUR with regard to LAPAC, Inc.'s possible violation of 2 U.S.C. §434 by failing to report LAPAC,S.D. and/or other local pro-life committees as affiliated organizations, but to incorporate this information regarding affiliation into MUR 996, which specifically deals with the affiliation issue. For reasons of confidentiality, we recommend that this file be kept open pending resolution of the affiliation issue and that the letters to LAPAC, S.D.; Jeanette Smith; and Kevin Conner be sent upon the closing of this matter. Recommendations

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- Take no further action concerning LAPAC, Inc.'s possible violation of 2 U.S.C. §434 by failing to report the liquidation of a debt.
- 2) Find reasonable cause to believe that LAPAC, Inc. violated 2 U.S.c. §441d by making expenditures for communications expressly advocating the election of clearly identified federal candidates without including required statements of authorization/non-authorization by these candidates endorsed, and enter into conciliation.
- 3) Find no reasonable cause to believe that LAPAC, S.D. violated 2 U.S.C. §441d by making expenditures for communications expressly advocating the election of clearly identified federal candidates without including required statements of authorization/non-authorization by those candidates endorsed.

- 4) Take no further action in this MUR regarding LAPAC, Inc.'s possible violation of 2 U.S.C. §434 by failing to report LAPAC, S.D. and/or other local pro-life committees as affiliated organizations, but authorize that the affiliation issue be incorporated with MUR 996.
  - 5) Approve the attached letters.

10/15/79

William C. Oldaker General Counsel

### Attachments

Exhibit C of complaint
Exhibit C-b of complaint
Exhibit D of complaint
Exhibit D of complaint
Exhibit E - additionally submitted by LAPAC, Inc. in Attachment 1
1 - LAPAC, Inc.'s Responses to Interrogatories
2 - LAPAC, S.D.'s Response to Interrogatories
3 - Affidavits submitted by LAPAC, S.D.

# Letters

RCTB letter to LAPAC, Inc. and Conciliation Agreement No RCTB letter to LAPAC, S.D. Letter of admonition to Jeanette Smith Letter to admonition to Kevin Conner 11811



# ATTENTION ALL VOTERS IN SELECTING YOUR CANDIDATES

YOU are voting on a life or death issue!
Who has the right to live?

All human beings.

Just the planned, the privilegod and the perfect.

ONLY a Human Life Amendment will restore the pricinal spirit of the Constitution quaranteeing the right to life to all human beings, born and uncorn, young and old, advantaged and handicapped, weak and strong.

The following candidates support a Human tille Amendment:

U.S. Senate: LARRY PRESSLER

U.S. House or Raprosentatives: IAMES ABONOR 308 SAMUELEON

Spuin Cakota Governor: WILLIAM JANKLOW

South Dakota Lt. Governor: LOWELL HANSON

South Dakota Alterney General: MARK METERHEMRY MAX GORS

State Treas.: DAVID VOLK

Shuit Dakota Senate:(Dist. 27) LYNDELL PETERSON South Dakota House: (Dist. 27)
GORDON PEDERSON
GEORGE CROUCH
DON HAM

OWEN CADY

-These condidates respect the rights of the defangaless.

They will respect yours!

VOTE PRO LIFE!

(This ad written is ordered and said for ny 1 a PAC-SD 11.15 Amendment Political Action Committee, White, 5 D. 57274), Ellen Company, Treas.



# LAPAC

menament Political Action Committee, Inc.)

the following Pro-Life candistes to the House and Senate the United States on Noember 7, 1978:

AIRY PRESSLEI has excellent voting record in the U.S. ouse on all pro-life tax issues and is co-sponsored a Human Life may drawnt.

EPTHINSMESS will nonsor and promote a Human Life mendment.

AMES ADMINI has one the best voting records for life in e U.S. House.

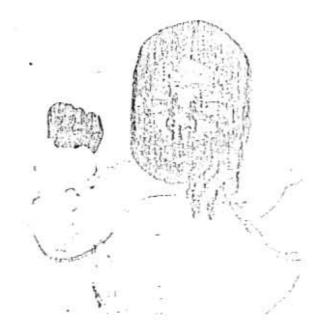
Vote FOR Life Movember 7

Sean Morton Downey, Jr., Chairman LAPAC, Inc.

Fron Ochonory State Courd autor, LAPAC, he

# THIS LITTLE GUY WANTS YOU TO

VOTE



FOR HIS LITE
NOVEMBER 7.

# VOTE FOR THE UNBORN

# There is a Difference!

THORSNESS

DASCHLE

"When elected to Congress -I would be honored to coponsor and prontate a Luntan Life Amendment."

"... 9 can't ouppost a Human Life Amendment."

Le Thorsness is strongly opposed to our tax dollars being used for abortions.

Daschel Would use your tax dollars to about babies.

# OTE PRO-LIFE TUESDAY, NOV. 7, 1978

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, 1'1C.
Benjamin Franklin Station • P.O. Box 14263 • Washing Qu. Sc. 20016 • C. U. U.

SUPPORT LIFE PAC

DHS SOLEMBLE IN

the wind the wind the



# A Vote For These Candidates Is

# A VOTE FOR LIFE

The following candidates support a Human Life Amendment to end the killing of unborn children and guarantee the constitutional right of all human beings to life irrespective of age, health, function or condition of dependancy.

For Gavernor:

WILLIAM JANKLOW

For Atty, General

MARK MEIERHERRY

MAX GORS

For Lt. Governor:

LOWELL HAMSEN II

For St. Treasurer:

DAVID VOLK 4

For U.S. Senate:

LARRY PRESSLER

For U.S. House of Rep. JAMES ABONDR -

BOB SAMUELSON LALAT

For South Daxota Senate - Dist. 27

MOSESTER DIEGINA

36 63 222 - 72 -

For South Dukota House - Dist. 27

4-0671 HAM

, nweri cady

LAPORNE SHAUCH

VOTE FOR THOSE WHO VALUELIFE THEY WILL VALUE YOURS!

Sponsored by LAPAC (Life Amendment Political Action Committee), Ha., White, SD

# STATEMENT BY THE RAPID CITY YOUTH FOR LIFE:

We are distribution this list for LAPIAC because THE SUPPLEME COURT DOES NOT SPEAN FOR US on abortion.

We believe every human barne has the night to his or her journey through life:

We believe those who are weak must be beined by the strong at all stages of life.

We believe this elected office as must have the intelligence, integrity and determination to solve social problems without resorting to the singularing solution of following the helpfass.

We are clud to live our time and efforts to work for these conditates who have pledical their support of a Human Life Amendment

Rapid City Youth For Life

If you share our concern and wish to join or nisp in and whe, call 342 5135

WELOVELIFE

Rapid G.f., S. Duk 5170

FILLL L

# Vote for the unborn —

# Thorsmess

**NOVEMBER 7, 1978** 

"If I am elected to Congress this November I would gladly sponsor a constitutional amendment allowing abortion only to prevent the death of the mother."





# LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

Benjamin Franklin Station . P.O. Box 14263 . Washington, D.C. 20044

A copy of our report is free with the Federal Election Commission and is anarable for purchase from the Federal Election Commission, Washington, D.C.

P.S. There's a difference in the two candidates for First District Congressman.

CEC 10760

Weder

# BARNETT, ALAGIA & CAREY

1627 K STREET, N.W.

WASHINGTON, D.C. 20006

TELEPHONE (202) 785-5572 CABLE ALL OFFICES ALBAR

BARNETT & ALAGIA\*
KENTUCKY HOME LIFE BUILDING
BOX 1178
LOUISVILLE, KENTUCKY 40201
TELEPHONE 15021 785-4131

BARNETT, ALAGIA & PROSPERI\*\*
249 80\*AL PALM WAY
PALM BEACH, FLORIDA 33480
TELEPHONE (301) 632-3666

August 1, 1979

BERNARD H. BARNETT
MARION EDWYN HARRISON
RICHARD M. TRAUTWEIN
JOHN T. MILLER\*
MICHAEL E. LANNON\*
RICHARD A. GLADSTONE
PATRICIA C. ANDERSON
ANTHONY O. BROWN\*
DARRYL W. DURHAM\*
WM. CARL FUST\*
GARY D. GARRISON\*
JOHN M. HIMMELBERG
W. DAVID KISER\*
MARY CHERYL MATHEIS
IVAN RICH\*

OF COUNSEL RUFUS E. WILSON

# BYHAND

D. PAUL ALAGIA, JR. WILLIAM A. CAREY ALEAN B. SOLOMON\*

M. BROOKS SENN"

JOSEPH M. DAY"

ST. JOHN BARRETT CHARLES DAWSON BARNETT\*

FRANKLIN DRAKES

RONALD L. GAFFNEY"

WILLIAM S. GLADING

DONALD F. MINTMIRE

JOHN F. SHERLOCK II.

JOHN E. EVANS"

JOHN S. KECK\* KARL F. LOUCKS II\*\*

JACK E. RUCK\*

9

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LEE C. SUMMERS\*

MARY JO WINKLER"

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

Re: Life Amendment Political Action Committee, Inc. MUR #960

Dear Mr. Oldaker:

In response to your letter of July 2, 1979 addressed to our client Life Amendment Political Action Committee, Inc. ("LAPAC"), MUR #960, we attach executed Answers to Interrogatories and comment as follows.

- LAPAC is not in violation of the provisions of 2 USC \$434 inasmuch as LAPAC reported the liquidation of the debt to which the Interrogatories make reference. See Interrogatory #3 and Answer.
- of 2 USC \$433 for failing to include LAPAC, S.D. and/or other prolife committees as affiliated organizations inasmuch as no such organization is affiliated. See Interrogatory #1 and Answer. Further, there is some question as to whether LAPAC, S.D. exists.

AHACKMENT 1

# Vote for the unborn —

# Thorsmess

NOVEMBER 7, 1978

"If I am elected to Congress this November I would glacky sponsor a constitutional amendment allowing aportion only to prevent the death of the mother;"

Levet Torsness



# LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

Benjamin Franklin Station . P.O. Box 14253 . Washington, D.C. 20044

A copy of our record is fried with the Federal Erection Commission and is available to purchase from the Federal Election Commission, Washington, D.C.

P.S. There's a difference in the two candidates for First District Congressman.

10760

Weder

# BARNETT, ALAGIA & CAREY

1627 K STREET, N.W.

WASHINGTON, D.C. 20008

TELEPHONE (202) 785-5572 CABLE ALL OFFICES ALBAR

BARNETT & ALAGIA\*
\*ENTUCKY HOME LIFE BUILDING
BOX 1179
LOUISVILLE, KENTUCKY 40201
TELEPHONE (502) 585-4131

BARNETT, ALAGIA & PROSPERI\*\*
248 ROTAL FALM WAT
PALM BEACH, FLORIDA 33480
TELEPHOME (305) 432-5886

August 1, 1979

BERNARD H. BARNETT
MARION EDWYN HARRISON
RICHARD M. TRAUTWEIN
JOHN T. MILLER\*
MICHAEL E. LANNON\*
RICHARD A. GLADSTONE
PATRICIA C. ANDERSON
ANTHONY O. BROWN\*
DARRYL W. DURHAM\*
WM. CARL FUST\*
GARY D. GARRISON\*
JOHN M. HIMMELBERG
W. DAVID KISER\*
MARY CHERYL MATHEIS
IVAN RICH\*

OF COUNSEL RUFUS E. WILSON

## BYHAND

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M. BROOKS SENN"

JOSEPH M. DAY"

ST. JOHN BARRETT

FRANKLIN DRAKE"

JOHN S. KECK"

JOHN E. EVANS"

WILLIAM S. GLADING

KARL F. LOUCKS II-

JACK E. RUCK\*

LEE C. SUMMERS'

C

3

MARY JO WINKLER"

CHARLES DAWSON BARNETT"

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

Re: Life Amendment Political Action Committee, Inc. MUR #960

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- 2. LAPAC is not in violation of the provisions of 2 USC §433 for failing to include LAPAC, S.D. and/or other prolife committees as affiliated organizations inasmuch as no such organization is affiliated. See Interrogatory #1 and Answer. Further, there is some question as to whether LAPAC, S.D. exists.

Haren -: 1

# BARNETT, ALAGIA & CAREY

William C. Oldaker, Esquire August 1, 1979 Page two

3. LAPAC is not in violation of the provisions of 2 USC \$441d with respect to Attachments 1, 2 and 3 to the Interrogatories, q.v. \$441d refers to communications "... through any broadcasting station, newspaper, magazine, outdoor advertising facility, direct mailing, or any other type of general public political advertising ... The regulation repeats the statutory language adding, by way of example as to limitation, exclusions as to "bumper strips, a pin, button, pen and similar small items upon which the disclaimer cannot be conveniently printed ... " 11 CFR \$110.11(a)(1). Thus, neither the statute nor the regulation includes a handbill, which obviously is not "general public political advertising" but rather a form of personal communication.

As a lawyer I find the purpose of the Federal Election Commission ("FEC") in drafting \$110.11(a)(1) as it did to be obvious - namely, to exclude "bumper strips, a pin, button, pen and similar small items upon which the disclaimer cannot be conveniently printed..." [Italics supplied.] Hence, if asked, I would have advised a client to include the applicable portion of the message set forth in 11 CFR \$110.11(a)(1)(ii), not because \$441d(2) necessarily requires it but because FEC intends it. However, because the handbills are not "general public political advertising" our client should not be held to a violation, however minimal and technical the violation otherwise might be.

The charges in MUR #960, all trivial whether or not accurate, emanate from a letter of April 30, 1979 to FEC from Ms. Gail M. Harmon, filing on behalf of her client the National Abortion Rights Action League ("NARAL"). NARAL is conducting a nationwide campaign of harassment and vilification of prolife groups. We have reason to believe NARAL has filed complaints with the FEC against seven or so other prolife organizations. In evaluating the charges at issue, the FEC should bear in mind this motivation. For example, on April 18, 1979 NARAL issued a press release, Attachment A, in which NARAL announced "allegations of major illegal actions by two national anti-aportion groups and four state anti-abortion groups . . ." The press release further announced a press conference on Capitol Hill for

BARNETT, ALAGIA & CAREY William C. Oldaker, Esquire August 1, 1979 Page three 10:00 AM on April 30. In addition, on April 12 NARAL issued another press release, to be held for release until April 30 at 10:30 AM, charging LAPAC and other prolife groups with "major" and "flagrant . . . " unlawful acts. Attachment B. It ill behooves FEC to waste its resources and those of lawful political action committees in facilitating NARAL's campaign of harassment. Our client waives confidentiality and requests that the full proceedings in MUR #960 be spread upon the public record. 2 USC §437q(a)(3)(B). Sincerely, MARION EDWYN HARRISON MEH:kg Enc cc Ms. Carolyn Weeder C 0 7

ATTACHMENT A

NATIONAL ABORTION RIGHTS ACTION LEAGUE 325 15th Street, NW, Washington D. C. 20005

FOR IMMEDIATE RELEASE

For more information, contact:

Janet Beels, Director of Public Information

(202) 347-7774 OR

Joan Eisenstedt, Conference Coordinater

347-7774 through April 27

April 27-30: 234-0700, NARAL/Shoreham Americana

ABORTION RIGHTS CONVENTION FOCUSES ON ELECTORAL POLITICS

Washington, D.C., April 18, 1979 ---- Abortion rights supporters from all 50 states will converge on Washington this month to attend the National Abortion Rights Action League's annual convention. The League, the nation's largest single-issue group working to defend abortion rights, will celebrate its 10th year of existence at the April 28-30 annual meeting, to be held at the Shoreham-Americana

The convention's focus on the combination of electoral politics with grassroots organizing parallels a recent change in strategy for the pro-choice group.

"This year," said Karen Mulhauser, NARAL Executive Director, "marks the beginning
of an aggressive compaign -- we call it "Impact '80" -- to let legislators know

That compulsory pregnancy is not the will of the people. We are arming our activists now to support those who vote for choice. We know that the majority of

Americans believe that abortion should remain a woman's personal decision and our
goal is to organize that majority."

In workshops and other information sessions, participants will hear the history of the issue and learn to mobilize to insure its future.

A list of speakers follows:

Midge Costance and Michael McCloud will lead the plenary on electoral politics (9-10:15 a.m., Sunday). Costanna, former Special Assistant to the President, will speak on the importance of grassroots involvement in electoral politics. McCloud,

right-hand man to John Anderson, will speak from his involvement in Anderson's successful campaign against a single-issue anti-abortion candidate in 1978.

Anderson will be meeting the abortion issue head-on again in his bid for the Republican presidential nomination.

Immediately following will be "how-to" workshops on electoral politics, led by six political consultants, including Matt Reese, specialist on campaigns for single-issue coalitions.

Highlights of Saturday's program include comments by well-known constitutional lawyer and abortion rights specialist <a href="Harriet Pilpel">Harriet Pilpel</a>, the General Counsel to Planned Parenthood Federation of America. She will speak of the recent history of the abortion rights struggle -- how the fight was won through litigation and Plegislation. (Saturday plenary, 10-11 a.m.) Also speaking will be <a href="Rebecca Cook">Rebecca Cook</a>, who has been consulting at cabinet and parliamentary levels on national family planning law and policy for the past six years with the International Planned Parenthood Federation. She will discuss the increasing liberalization of abortion laws in other countries in the past dozen years, and its connection with other Ccivil rights for women abroad. (Also Saturday plenary session)

Saturday brunch will include an address from Jeannie 1. Nosoff, President of the Alan Guttmacher Institute. Rosoff will share her perspective as a long-time member of the Capitol Hill scene, recalling the days when even contraception was a practically forbidden topic.

Sesson I workshops (2:45-3:45 p.m., Saturday) include Minors' Rights by Bill Baird, who has been challenging restrictive birth control and abortion laws for 15 years, and is the plaintiff in Bellotti v. Baird, now before the Supreme Court, a case which will dramatically affect the rights of teenagers to abortions.

Session I will also mark the beginnings of the first national group for doctors erganizing to defend a woman's right to abortion. The <u>Physicians for Choice</u> workshop will be directed by <u>Dr. Christopher Tietre</u>, one of the world's most eminent authorities on human fertility and its control. Dr. Tietre is now a Senior Consultant to

the Center for Policy Studies of the Population Council where he is primarily concerned with research in the demographic and public health aspects of induced abortion. Dr. Tietze, with <u>Dr. Jack Lippes</u>, inventor of the "Lippes Loop" IUD, will discuss how to organize physicians to become actively involved in abortion rights.

Naomi Baden, Executive Director of the Coalition of Labor Union Women and a staff member of the Amalgamated Clothing and Textile Workers Union, will lead Working with Union People, also in Session I. She will speak to the possibilities and problems of cooperation between abortion rights groups and labor unions.

Pat Gavett, Executive Director of the Religious Coalition for Abortion Rights, will preside over a workshop on Working with the Religious Community in Session II

(4:15-6 p.m., Saturday). The Religious Coalition was responsible earlier this year

for the recommitment of 18 of its member denominations and religious organizations

to make abortion rights one of the major social action issues on which they work.

Well-known organizing expert and Director of the Midwest Academy, Reather Booth,

will lead a community organizing workshop. Uta Landy, Executive Director of the

Chational Abortion Federation, the professional association of abortion providers, and

Who established the first national toll-free consumer hotline on abortion, will lead

the Clinic Organizing workshop.

<u>Dr. Belem Rodriques-Trias</u>, Chief of Pediatrics at Roosevelt Hospital in New York, will join other minority leaders in chairing the <u>Working with Minorities</u> workshop. She is a founder of the Committee to End Sterilization Abuse, and works to protect Puerto Rican woman against coerced sterilization.

Monday, April 30 (8:30 a ) Leected so far are George Mille (D-CA), Michael Barnes (D-MD), Ted Weiss (D-NY), Tony Beilenson (D-CA), Vic Fazio (D-CA), and others.

Immediately following, a press conference will announce NARAL's allegations of major illegal actions by two national anti-abortion groups and four state anti-abortion groups. The conference will be held on Capitel Hill (exact location to be announced), at 10:00 a.m. Karen Mulhauser, NARAL Executive Director, will speak, and NARAL's actorney and others will be available as resource people. NARAL will be filing complaints against all six groups that morning with the Federal Election Commission. Another complaint against an Iowa anti-abortion group, the Pro-Life Action Council, was filed with the FEC by NARAL last year. It is still under in-

Convention-goers and many others will spend the rest of the day lobbying their Congresspeople on the issue of abortion rights.

- 30 -

Son attached schadule for more details.

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ON MARAL

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News Release

NATIONAL ABORTION RIGHTS ACTION REACUE TED

HOLD FOR RELEASE UNTIL

For more information, contact:

Janet Beals, Director of Public Information
(202) 347-7774

JUL 1 11979 > APRIL 30, 1979, 10:30 AM

SIX ANTI-ABORTION CACUPS CHARGED
WITH ELECTION LAW VIOLATIONS

Washington, D.C. 5/30/79 -- Complaints alleging violations of federal election laws by two national and four state anti-abortion groups were filed today with the Federal Election Commission.

The complaints were filed by the National Abortion Rights Action League against two rational anti-abortion organizations, the Life Amendment Political Action Committee (LAPAC), and the National Right to Life Committee (NRLC). Complaints were also filed against state anti-abortion groups in South Dakota, Massachusetts, Indiana and New Mexico.

"We are appalled at the major violations of federal election laws that we have found in our limited search. We are asking the Federal Election Commission to investigate the extent of this lawbreaking, and take appropriate action," said Executive Director Karen Mulhauser.

"Both national groups flagrantly violated election laws in 1978, and continue to do so. We nove been saying since last November that their claims to political strongth lask credibility. Their illegal actions make them even less credible."

NASAL is charging that the Life Amendment Political Action Committee is illegally soliciting funds from the general public through advertising, direct mail requests and ticket sales. NASAL alleges that the Life Amendment Political Action Committee is connected with the National Right to life Committee, and federal election law clearly states that an affiliated organization may only solicit contributions from its parent organization's membership . . . not from the general public.

NARMA has requested the Tederal Election Commission to order that such illegal activity be discentinued and to instruct LAPAC to return these illegally solicited funds to the denots. NARAL's second complaint, against the National Right to Life Committee, alleges that NRLC's Voter Identification Project (which seeks to identify anti-abortion voters and mobilize them in support of anti-abortion candidates) constitutes unlawful corporate contributions to anti-abortion candidates. NARAL is requesting that the FTC prohibit NRLC's Voter Identification Project.

MARAL is also drawing to the FEC's attention unreported and illegal election activit in South Dakota, Massachusetts, Indiana and New Mexico.

Penalties for these violations of federal election law by two national and four stater anti-abortion groups could total in excess of a hundred thousand dollars. If the violations are found to be knowing and willful penalties could be double that amount.

NAPPAL's complaint to the Federal Election Commission alleging illegal activities by the Iowa Pro Life Action Council in the 1978 election is still under investigation.



NATIONAL ABORTION RIGHTS ACTION LEAGUE 825 15th Street, NV. Washington D. C. 20005 (202) 347-7774

Complaints against two national and four state anti-abortion organizations for past and present violations of federal election law are being filed with the Federal Election Commission by the National Abortion Rights Action League. A summary follows:

# NATIONAL

o The Life Amendment Political Action Committee (LAPAC), a national antiabortion PAC, is illegally soliciting contributions from the general public, The close working relationship and overlap of personnel between the Boards of Directors, officers, and staff of LAPAC and the National Right to Life Committee prove that the two organizations are connected. According to federal election law, a political action committee connected with a membership organization may. Conly solicit contributions from the membership pool of the connected organization.

NARAL requests that the FEC stop the anti-abortion PAC from raising money from the general public, and return the monies illegally collected.

The Voter Identification Project of the National Right to Life Committee,
 a national anti-abortion organization, is illegally contributing to the campaigns of political candidates in lows, Indiana, and other key states. The project scokes to identify anti-abortion voters in every state and mobilize them in support of anti-abortion candidates. Such activities by a corporation for the benefit of a candidate are considered in-kind contributions and are unlawful under federal election law.

NARAL is asking the FEC to spop NRLTC from pursuing this illegal activity, and to prohibit them from transferring any of this information to a political action committee unless at a fair market value. NALAL further requests that the FEC investigate how excensive and in how many states this illegal activity has been undertaken.

### STATES

A large amount of unreported election activity was conducted by one of two continuous in South Dakota. Over \$1500 was spent to buy newspaper ads and print brochures endorsing federal conditate. This violated federal election laws by exceeding the \$1000 spending limit for unregistered contributors. The compaign materials cauried the authorization of the life Amendment Political Action Cormittee (headquartered in Washington, D.C.), which did not report the expenditures. Either the Washington group should almost and report the expenditures, or LAPAC-South Dakota, the state group, operated allegally by not registering or filling reports with the Federal Election Commission.

o A Massachusetts Di-abortion group, Massachuse Citizens for Life, noted illegally by distributing a brochure to the general public endorsing federal candidates. This constitutes an unlawful corporate contribution to a campaign.

Because the Massachusetts group is an affiliate of the National Right to Life Committee, and because NRLEC's past president, Dr. Mildred Jefferson, is connected with the local group, NARAL suspects that the violation was knowing and willful.

o A great deal of anti-abortion political activity, including printing and distribution of brochures and placement of full-page ads in newspapers, took place in Indiana's 8th Congressional District, and was not reported to the Federal Election Commission. The activity was done in the name of the Right to Life Chapter of the 8th Congressional District, but was not reported by that group. Neither was it reported by the registered political action committee of Indiana Right to Life, with which the district group is affiliated. This is in violation of federal election law requiring reporting of any campaign contributions of corporations and political action committees.

In addition, a large number of purportedly personal letters (signed by a local priest and other anti-abortion leaders) endorsing a candidate were railed in the district without naming the political group that authorized them, in clear violation of federal election law. Postage for some of these letters was paid by a political campaign, one indication that the letters were not simply personal.

e An anti-abortion group incorporated in New Mexico, The Right to Life Conmittee of New Mexico, violated election laws by printing and distributing large numbers of newsletters endorsing state and federal candidates. This constitutes an unlawful corporate contribution to a political campaign.

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NARAL found this illegal activity in the four states it investigated.

EARAL is asking that the FEU investigate for similar activity in these and other states. Because the pattern is similar, the possibility is great that unlawful activity is more extensive, than we discovered in the initial research.

The Federal Election Commission, if it finds violations, may enforce a panalties up to the amount of the violation, which would total in excess of a hundred thousand dollars in these instances. If the violations are considered knowing and willful, penalties can reach double the amount of the violation.

# BEFORE THE FEDERAL ELECTION COMMISSION

NATIONAL ABORTION RIGHTS ACTION LEAGUE

v.

MUR #960

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

# ANSWERS TO INTERROGATORIES

- la. What is your relationship with LAPAC, S.D.?
  - No relationship.
- 1b. Have you ever in any way provided administrative or financial assistance to LAPAC, S.D. or to any other local prolife committees?
  - A. No.
  - lc. Is LAPAC, S.D. a member of LAPAC, Inc.2
    - A. No.
- Id. If so, what does this mean in terms of benefits to LAPAC, S.D. or duties?
  - A. Not applicable.
- Did the federal candidates endorsed in your flyers and brochures in any way consent to, cooperate with,

William.

- 1 resident \_\_\_\_

request, or suggest the use of their names? If sc, please explain.

- A. No. Life Amendment Political Action

  Committee, Inc. ("LAPAC") issued only three flyers pertaining
  to South Dakota elections. Attachments 1, 2 and 3.
- 3. Explain how your committee liquidated the debt of \$669.10 to Harold's Printing Company in your 30-day post general election report and explain why this was not reported.
- A. LAPAC liquidated said debt by a payment of \$350.00 under date of January 4, 1979 and \$319.19 under date of March 22, 1979, photocopies of checks attached as Attachments 4 and 5.

LAPAC reported both payments. See LAPAC's First Quarter 1979 Report, filed April 10, 1979, pages 1 and 12.

- 4. Provide a copy of every communication sponsored and paid for by LAPAC, Inc., endorsing any federal candidate and the number of copies of each printed and distributed.
- A. As to South Dakota (the subject matter of MUR #960), see Interrogatory #2, supra. Of Attachment 1, 15,000 were printed. Of Attachment 2, approximately 100 were printed.

  Of Attachment 3, approximately 100 were printed.

As to states other than South Dakota (each beyond the scope of MUR #960), LAPAC paid to Lessing Flynn Ad Agency, Des Moines, Iowa, the sum of \$2,000.00 to defray in part the

distribution by Pro-Life Action Council, Box 2035, Des Moines, Iowa 50310, of a brochure Attachment 6. See LAPAC's November 7, 1978 10-day report, page 2.

- 5. Itemize and describe in detail all expenses incurred in the preparation and distribution of every communication relating to any federal election, including costs for design, layout, printing, postage, salaries, etc.
  - A. See Interrogatory #3, supra.
- Provide a copy of LAPAC, Inc.'s Articles of Incorporation/Bylaws and a list of its Board members.
- A. Articles of Incorporation and Bylaws attached as Attachments 7 and 8.

Directors are Mr. Paul A. Brown, Mrs. Judith A. Brown, Mrs. Mary Hunt.

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

By Case A. BROWN, Treasurer

District of Columbia

City of Washington, ss: My Community 14, 1984

> PAMELA L. VENNERDROW Notary Public, D.C.

My Commission expires April 14, 1984.

## LAPAC

(Life Amendment Political Action Committee, Inc.)

Endorses and urges your support of the following Pro-Life candidates to the House and Senate of the United States on November 7, 1978:

LARRY PRESSLER has an excellent voting record in the U.S. House on all pro-life tax issues and has co-sponsored a Human Life Amendment.

LEO THORSNESS will sponsor and promote a Human Life Amendment.

JAMES ABONOR has one of the best voting records for life in the U.S. House.

Vote FOR Life November 7

Sean Morton Downey, Jr., Chairman LAPAC, Inc.

Ellen Gempsey, State Coordinator, LAPAC, Inc.

# THIS LITTLE GUY WANTS YOU TO VOTE



FOR HIS LIFE NOVEMBER 7

If you'd like to

## Vote for the unborn -

# Thorsness

NOVEMBER 7, 1978

"If I am elected to Congress this November I would gladly sponsor a constitutional amendment allowing abortion only to prevent the death of the mother."





#### LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

Benjamin Franklin Station • P.O. Box 14253 • Washington, D.C. 20044

A copy of our report is first with the Federal Election Commission and is aware be for our case from the Timberal Election Commission, Washington, D.C.

P.S. There's a difference in the two candidates for First District Congressman.

# VOTE FOR THE UNBORN There is a Difference!

THORSNESS

"When elected to Congress
9 would be honored to cospansor and promote a
Human Life Amendment."

Leo Thorsness is strongly opposed to our tax dollars being used for abortions. DASCHLE

"... 9 can't support a Human Life Amendment."

Daschel would use your tax dollars to abort babies.

#### VOTE PRO-LIFE TUESDAY, NOV. 7, 1978

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC. Benjamin Frankiin Station • P.O. Box 14253 • Washington, D.C. 20044

F 50% of the small a liver with the Februar Flerbook Commission and it available for burings from the Februar Empirical Commission in extension, O.C.

# Vote for the unborn Your vote is CRUCIALI

LIFE AMENDMENT POLITICAL ACTION COMMITTEE INC. ENDORSES AND URGES YOUR SUPPORT OF THE FOLLOWING PRO-LIFE CANDIDATES TO THE HOUSE AND SENATE OF THE UNITED STATES ON NOVEMBER 7, 1978.

SOUTH DAKOTA SENATE: LARRY PRESSLER IS BY FAR THE BEST PERSON TO SEND TO THE SENATE.

SOUTH DAKOTA 1ST CONGRESSIONAL DISTRICT: LEO THORSNESS SUPPORTS
THE HUMAN LIFE AMENDMENT AND WILL BE A LEADER IN OUR FIGHT TO
RESTORE RESPECT FOR THE UNBORN.

SOUTH DAKOTA 2ND CONGRESSIONAL DISTRICT: REPRESENTATIVE JAMES ABDNOR HAS ONE OF THE BEST PRO-LIFE VOTING RECORDS IN THE HOUSE AND DESERVES YOUR FULL SUPPORT FOR RE-ELECTION.

PLEASE BACK ALL THREE OF THESE MEN THIS NOVEMBER 7TH. VOLUNTEER YOUR TIME NOW AND GIVE MILLIONS OF UNBORN CHILDREN THE CHANCE TO SEE WHAT WE TAKE FOR GRANTED....THE LIGHT OF COD'S BEAUTIFUL DAY.

SEAN MORTON DOWNEY JR. CHAIRMAN: LAPAC INC.

-

ELLEN DEMPSEY STATE COORDINATOR: LAPAC INC.

### NOVEMBER 7, 1978 - VOTE PRO-LIFE

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

Benjamin Franklin Station • P.O. Box 14263 • Washington, D.C. 20044

A copy of your report is firm, with the Federal Election Commission and is available for circhase from the Federal Election Commission. Washington, D.C.

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Pro-Life Action Council P.O. Box 2035 Des Moines, Iowa 50310

BULK RATE U.S. POSTAGE PAID Permit No. 1343 Des Moines, Iowa

ATTACHMENT 6

## Vote for the Unborn on Nov. 7th!

In America today, the most helpless member of the human family - the unborn child - has been denied the protection of the law! Sad but true, even some endangered species of animals enjoy more legal protection than the unborn child.

You have an unalienable right to life. And that right was legally protected for you from the day you were conceived. Today. because of a single Supreme Court decision, the same right to life you have always possessed has been taken away from the unborn. child. If the unborn can be "terminated" today just because they are unplanned unwanted or inconvenient, who might be eliminated for similar reasons tomorrow - the aged, the sickly. the mentally retarded, the physically handicapped? In the end,

just how safe will YOUR right to life be?

The unborn cannot speak for themselves but you can speak for them — with your vote on Tuesday. November 7th! We must elect men and women who will work for passage of a Human Life Amendment (H.L.A.) to the Constitution. This amendement will guarantee legal protection for ALL human life, regardless of age. health, capability or state of dependency.

If you feel, like our forefathers did, that the right to life is the foundation of all human rights, then read below how the various candidates stand on key pro-life issues - and VOTE on November 7th!



Roger **JEPSEN** 

#### UNITEDISTATESISENATE

#### HUMAN LIFE AMENDMENT (H.L.A.)



Jepsen will sponsor and support a human Life Amendment to restore legal protection for the unborn shild

Clark is opposed to any meaningful Human Life Amendment to restore the right to life for the unborn child.



Dick CLARK

#### \_USE OF TAX DOLLARS TO PAY FOR GOVERNMENT-SUBSIDIZED ABORTIONS



Jersen is opposed to using your tax conary in any was to pay for abortion \$07V CC\$

Clark has consistently supported using your tax do lars to pay for aportions



#### FORCING EMPLOYERS TO PROVIDE ABORTION BENEFITS.



Jedsyn Supports a "conscience diause" permitting crivate employers to exclude abortions, from pregnancy disability benetits

Clark has victed to force private YES pregnancy disability penetic



#### ENDORSED BY . . .

Fire Life Aption Country of lower Life Amendment Point day Action Committee National Pro-Life Polical Action Committee SUPPORTED BY . . .

National Abortion Rights Aption League - the most radical and mintart pro-about on prolifing Africa is

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James LEACH

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#### Richard MEYERS

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#### Jerry FITZGERALD

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#### Robert RAY

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#### Terry BRANSTAD

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#### William PALMER

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#### Since The Supreme Court Legalized Abortions in 1973 . . .

- ... over 6,000,000 abortions have been performed in the United States in the past five years.
- over \$255,000,000 in tax dollars have been spent to directly pay for 1,400,000 government-subsidized abortions.
- parents have been stripped of their rights to be consulted or even notified before their minor daughters undergo abortions.
- Now Ask Yourself If This Issue Is Important Enough To Base Your Vote On?

Your vote on Tuesday, November 7th is CRUCIAL! Several important races can be decided by a margin as narrow as 1 or 2 votes per precinct. If you vote and urgo, your produce friends and relatives to vote, the electron of qualified produce candidates will be assured. Se sure to VOTE ... and PLEASE help us in our 1 ght 1 is stop the legalized killing of human life —

MAIL THIS COUPON TODAY!-

- ... fathers have been stripped of their rights to protect the lives of their unborn children.
- some calloused members of Congress argue that it is cheaper to pay for abortions than to provide post-natal care.
- describe human pregnancy as "the second leading form of venereal disease."

P O Box 2035
Des Moines, fowa 50310

YOUR NAME

ADDRESS\_

Enclosed is my contribution to help defray the costs of printing and mailing (donations are tax deductible).

\_\_\$100 \_\_\$75 \_\_\$50 \_\_\$25 \_\_\$10 \$\_\_

PHONE

#### ARTICLES OF AMENDMENT

TO THE

#### ARTICLES OF INCORPORATION

OF

#### LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

To: The Recorder of Deeds of the District of Columbia, Washington, D. C.

Pursuant to the provisions of the District of Columbia Nonprofit Corporation Act the Board of Directors of Life Amendment Political Action Committee, Inc., adopts the following Articles of Amendment to the Articles of Incorporation of Life Amendment Political Action Committee, Inc.

FIRST: The name of the corporation is:

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

SECOND: The period of duration is perpetual.

THIRD: The specific and primary purposes for which this Corporation is formed and for which it shall be exclusively administered and operated are to receive, administer and expend funds for political, charitable and educational purposes in connection with the following:

- To engage in nonpartisan research, study and analysis, for the benefit of the general public, regarding the political structure of the United States;
- To engage in nonpartisan research, study and analysis for the benefit of the ceneral public on those questions affecting the public interest with respect to both the public and private sectors, and to publish the results of such study;
- To prepare educational materials and conduct educational activities in support of the general purposes of the Corporation;

To conduct and sponsor forums, lectures, debates and similar programs; To qualify as a political committee and as a multicandidate political committee pursuant to the provisions of \$\$301(d) and 320(a)(4) of the Federal Election Campaign Act Amendments of 1976 (or corresponding provisions of subsequent federal election laws); To assist other political, charitable or educational organizations in the conduct of lawful activities: To engage in any and all lawful activities incidental to the foregoing purposes except as restricted herein; To accomplish the foregoing purposes, the Corporation shall also have the power to: a. sue and be sued: b. contract; c. receive property by devise or bequest, subject to the laws regulating the transfer of property by will, and otherwise accuire and hold all property, real or personal, including shares of stock, bonds and securities of other corporations; d. act as trustee under any trust the objects of which are related to the principal objects of the Corporation, and to receive, hold, administer and expend funds and property subject to such trust; e. convey, exchange, hypothecate, lease, mortgage, encumber, transfer upon trust or otherwise dispose of all property, real or personal; borrow money, contract debts and issue bonds, notes and debentures, and secure the payment of and performance of its obligations; and g. do all other acts necessary or expedient for the administration of the affairs and attainment of the purposes of the Corporation; - 2 -

FOURTH: The Corporation is not to have members. No part of the net income of the Corporation shall inure to the benefit of or be distributable to its directors, officers, or other private persons, except that the Corporation shall be authorized and empowered to pay reasonable compensation for services actually rendered and to make payments and distributions in furtherance of the purposes and objects set forth in Article THIRD hereof. The business of the Corporation shall be carried on through its Board of Directors; the manner of their election or appointment, other than the initial Board of Directors provided for in the Articles of Incorporation, shall be as provided in the Bylaws. The private property of the incorporators, SEVENTH: directors and officers shall not be subject to the payment of corporate debts to any extent whatever. In furtherance and not in limitation of the powers conferred by statute, the Corporation expressly is authorized to carry on its business and to hold annual or special meetings of its Board of Directors in any of the states, territories or possessions of the United States or the District of Columbia. Upon the dissolution of the Corporation EIGHTH: or the winding up of its affairs, the assets of the Corporation shall be distributed exclusively for charitable, religious, scientific, testing for public safety, literary or educational purposes to organizations which are then exempt from federal tax under \$501(c)(3) of the Internal Revenue Code of 1954, 2 or corresponding provisions of any subsequent federal tax laws and to which contributions are then deductible under §170(c) (2) of such Code or corresponding provisions of any subsequent federal tax laws. ADOPTION: These Articles of Amendment were adopted at a meeting of the Board of Directors held on August 1, 1978 and received a vote of a majority of the Directors in office, - 3 -

there being no members having voting rights with respect thereof. LIFE AMENDMENT POLITICAL ACTION COMMITTEE, Attest: in R. Daepen

#### BYLAWS

OF

#### LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

#### ARTICLE I - Name and Offices

- §1. Name. The name of this Corporation is Life Amendment Political Action Committee, Inc. ("LAPAC").
- §2. Offices. The principal office of the Corporation is in the District of Columbia. The Corporation also may have offices at such other places as the Board of Directors may appoint.

#### ARTICLE II - Purposes

- §1. General. The specific and primary purposes of the Corporation are set forth in the Articles of Incorporation.
- §2. Restrictions. The Corporation uses its funds only to accomplish objectives and purposes consistent with these Bylaws. No part of such funds shall inure, or be distributed, to members of the Corporation. If the Corporation be dissolved, assets remaining, if any, shall be distributed as provided in the Articles of Amendment to the Articles of Incorporation.

.5 §3. Meetings.

#### ARTICLE III - Board of Directors

- Duties. The Board of Directors manages the business and property and determines the policy of the Corporation pursuant to, and within the scope of, the Articles of Incorporation and the Bylaws.
- Composition and Tenure. The Board of Directors consists of seven members. A Director holds office until a successor qualifies. At each annual meeting of the Board of Directors, held in December of each year on a date specified at least 30 days in advance by the Board of Directors, the Board of Directors elects those individuals who shall serve thereon for the terms prescribed herein. Whenever a vacancy occurs for a reason other than expiration of a term of a Director, the remaining members of the Board may fill said vacancy. Effective at the December 1978 annual meeting two Directors shall be elected for one-year terms, two for two-year terms and three for three-year terms. Thereafter, each term will be for three years.
- The Board of Directors meets in December. If the Board shall fail to designate at least 30 days in advance of said meeting the time and place thereof, said meeting shall be held commencing at 1:00 PM on the first

Monday in December at the principal office of the Corporation. The Board may hold additional meetings at any time and place it may designate upon 10 days written notice to each Director or upon written waiver. The Chairman or the Treasurer may call any such meeting. 54. Chairman of the Board. The Board elects the Chairman, who also serves as President of the Corporation, at its December meeting, to serve until the adjournment of the following December meeting. In the event the office of the Chairman becomes vacant, the Board elects an individual to serve the unexpired term. \$5. Quorum. A majority of the Board of Directors constitutes a quorum provided that if less than a quorum C of the Board is present at a meeting duly called a majority of those present may adjourn the meeting from time to time without further notice. 0 Resignation. A Director at any time may resign effective upon the date of his actual resignation or upon any successive date by delivering to each Director written notice. \$7. Compensation. A Director receives no stated salary for his services but by resolution of the Board may

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receive a fixed stipend and/or his expenses of attendance, if any, or both, for actual attendance upon a meeting of the Board. A member of the Board serving the Corporation as an officer or employee of the Corporation or in a contractual capacity may be compensated for such service.

- §8. <u>Voting Rights</u>. Each Director has one vote.

  By a written memorandum filed with the Board of Directors

  the Board may confirm nunc pro tunc an informal action

  taken by the Board and in that event the Directors need

  not have been present in the same place at the time of the

  taking of the action or upon the filing of said written

  memorandum.
- §9. Majority. All votes of the Board of Directors are by a three-fifths majority of a quorum unless otherwise specified in the Bylaws.
- §10. <u>Carryover of Term</u>. A member of the Board of Directors serves until a successor is elected and qualifies.
- \$11. Attendance at Meetings. If a member of the Ecard shall fail to attend three consecutive meetings of the Board without approval or ratification of his actions by the Board, his membership on the Board automatically terminates.

Parliamentary Rule. ROBERT'S RULES OF ORDER, \$12. REVISED, in the most recent edition available, applies to the conduct of business. ARTICLE IV - Officers Designation. At its December meeting the Board \$1. of Directors also elects the Secretary and the Treasurer, either of whom need be a Director. Each serves for a term of one year or to fill an unexpired term, whichever is the shorter period. No person, including a Director, simultaneously may hold two or more of said offices. Agents and Assistants. The Board of Directors may elect such agents and assistants as it may deem C necessary for performance of duties delegated to them by the Board. C Compensation. The Board fixes the compensation, including expenditure authorizations and reimbursement of expenditures, for all officers, agents, assistants and other personnel. §4. Removal. The Board of Directors may remove an officer of the Corporation at any time, and without advance notice to him, for any reason which in its judgment best - 5 -

serves the Corporation but may not abrogate a contractual right of any person so removed. Should an office of the Corpora-Vacancies. tion become vacant, by whatever cause, the majority of the Directors then in office, although less than a quorum, may fill any such vacancy. Carryover of Term. An officer serves until his successor is elected and qualifies. President and Chairman. The President and Chairman is the chief executive officer of the Corporation, performs those duties normally inherent in said office and 0 presides over meetings of the Board of Directors. C Secretary. The Secretary prepares and maintains \$8. 7 minutes of meetings of the Board of Directors, maintains the records of the Corporation and performs those duties C normally inherent in said office. :0 The Treasurer is custodian of 59. Treasurer. corporate funds and securities and keeps full and accurate accounts of receipts and dispursements; deposits all monies and othe valuable affects in the name, and to the credit, of the Corporation in such depositories as the Board of Directors 00040191705

may designate; disburses funds as authorized by the Board; reports at the December meeting and otherwise when directed to the Board; submits to an annual independent audit directed by the Board; complies with applicable reporting and other provisions of the Federal Election Campaign Amendment Act of 1976, PL 94-283, 2 USC §§431 et seq, as amended, and any other applicable law.

#### ARTICLE V - Fiscal Year

The fiscal year is the calendar year. The fiscal year 1977 commences on the date of incorporation of the Corporation.

#### ARTICLE VI - Indemnification

The Board of Directors shall indemnify the President and Chairman, the Secretary, the Treasurer, and members of the Board of Directors, the employees and agents of the Corporation and former Presidents and Chairmen, Secretaries, Treasurers and members of the Board of Directors, employees or agents, expenses actually and necessarily incurred by them in connection with the defense of any action, suit or proceeding (actual or threatened; brought by or in the light of the Corporation or otherwise; civil, criminal, administrative

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or investigative, including appeal) in which they, or any of them, are made parties, by reason of being, or having been, President, Chairman, Secretary, Treasurer or a member of the Board of Directors, an employee or an agent of the Corporation, except in relation to matters in which any such person shall be judged finally in such action, suit or proceeding to be liable for negligence or for misconduct in the performance of duties. The term "expenses" herein means all amounts paid in settlement by any such person in connection with any such matter as to which the Corporation is advised by counsel selected by the Corporation that such persons to be indemnified did not commit such a breach of duty. The Board of Directors may advance any such expenses prior to the final disposition of the action, suit or proceeding.

#### ARTICLE VII - Amendments to Bylaws

These Bylaws may be amended by the Board of Directors upon ten days written notice of intent to amend to each member of the Board of Directors.

#### ARTICLE VIII - Notice

Notice of any kind whatsoever to any person holding office in, contracting with or doing business with the

Corporation shall be good and sufficient if mailed certified, postage prepaid to the last known address of record of the addressee, and shall be mailed in good time if postmarked on or before the date which equals or exceeds the number of days requisite for advance notice. ARTICLE IX - Use of Words As appropriate herein, a word may be used in the singular or plural, masculine or feminine. Verbs may be used in the appropriate tense and in the imperative. RATIFIED AND APPROVED BY THE BOARD OF DIRECTORS ON AUGUST 1, 0 1978 IN WASHINGTON, D.C. C 0 .5 Attest:

MAL, JOHNSON, DOYLE, BECKER & MSHER, P.C.

Weeker PC

903533

COUNSELLORS AT LAW

412 WEST NINTH STREET

PO BOX 1443

SIOUX FALLS, SOUTH DAKOTA 57104

TELEPHONE

JAMES R. BECKER GALE E. FISHER DERALD W. WIEHL RICHARD MOE EDWARD J. LEAHY GARY D. JENSEN

GEORGE O KIHNSON

HARRIDG DOME

August 6, 1979

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

> Re: Life Amendment Political Action Committee, Inc. -South Dakota

MUR 960

Dear Mr. Oldaker:

I represent Life Amendment Political Action Committee - South Dakota ("LAPAC-SD") in connection with the above matter. As requested in your letter of July 2, 1979, addressed to our client, we enclose executed Answers to Interrogatories.

The activities of LAPAC-SD were limited solely to those in connection with elections for statewide offices in South Dakota. LAPAC-SD has not, at any time, participated, either directly or indirectly, in any elections or campaigns for federal office. Specifically, LAPAC-SD has not expended any funds, either directly or indirectly, in connection with the campaigns for Congress referred to in the letter of Ms. Gail M. Harmon to the FEC dated April 30, 1979.

We believe that this information, together with the Answers to Interrogatories enclosed will provide your office with sufficient information to determine that the charges of Ms. Harmon are totally unfounded and to close the file on this matter insofar as LAPAC-SD is concerned.

However, if further information is required, please advise the undersigned.

Our client, LAPAC-SD, hereby waives confidentiality and requests that the full proceedings in MUR 960, insofar as it relates to LAPAC-SD, be spread upon the public record. 2 U.S.C. \$ 457(g)(a)(3)(B).

Very truly yours,
MAY, JOHNSON, DOYLE, BECKER & FISHER, P.C.

Ву

JRB: SW

James R. Becker

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cc:

Ms. Carolyn Weeder

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#### BEFORE THE FEDERAL ELECTION COMMISSION

#### LIFE AMENDMENT POLITICAL ACTION COMMITTEE, SOUTH DAKOTA

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MUR 960

#### ANSWERS TO INTERROGATORIES

1. What is your committee's relationship to LAPAC, Inc.?

ANSWER: There is no relationship between Life Amendment Political Action Committee, South Dakota and LAPAC, Inc.

Did you pay any bills for, liquidate any debts for, or transfer any funds to LAPAC, Inc.? If so, please explain.

ANSWER: To my best knowledge, no bills were paid for, debts liquidated, or any funds transferred to LAPAC, Inc.

3. Did the federal candidates endorsed in your flyers and brochures in any way consent to, cooperate with, request, or suggest the use of their names or positions in these materials? If so, please explain.

ANSWER: No federal candidates were endorsed in flyers or brochures paid for by Life Amendment Political Action Committee, South Dakota, to my best knowledge.

4. Please itemize all expenses incurred in the preparation and distribution of every communication (ads. brochures, flyers, etc.) relating to a federal election. Please include and describe expenses incurred for design, layout, printing, postage, salaries, etc. of these communications.

ANSWER: No expenses were incurred in the preparation and distribution of any communications relating to a federal election by Life Amendment Political Action Committee, South Dakota.

5. How did your committee obtain information about the candidates' views on pro-life issues and what costs were incurred in collecting this information?

ANSWER: Life Amendment Political Action Committee, South Dakota did not engage in any activities seeking to obtain information about federal candidates' views on pro-life issues and accordingly no costs were incurred by it in collecting any such information.

6. Please state exact amounts of expenditures and contributions, and any other monies relating to any federal activities. Please itemize and describe each of these expenditures and contributions in detail. ANSWER: None. 7. Is LAPAC, S.D. registered as a political committee in South Dakota? If so, please submit copies of any statements or reports filed with the state. ANSWER: Yes. Copies of Life Amendment Political Action Committee, South Dakota's filings with the South Dakota State Ethics Commission were attached to the letter dated April 30, 1979 from Gail M. Harmon to the Federal Election Commission which apparently was the basis for the above Complaint. No reports after that date have been filed with the South Dakota State Ethics Commission. 8. Is LAPAC, S. D. incorporated? If so, please submit copies of Articles of Incorporation, By-Laws, etc. If not, please submit a list of Board members or officers of LAPAC, S. D. ANSWER: Life Amendment Political Action Committee, South Dakota is not incorporated. Its sole officer is Ellen Dempsey, Treasurer, White, South Dakota. 9. Has your group ever received money from other pro-life groups? If so, please state the name and address of the group, the amount of money and the date of the transfer of money. ANSWER: All contributions received are listed on the reports filed with the South Dakota State Ethics Commission. Has your group ever transferred money to other pro-life groups. If so, please state the name and address of the group, the amount of money and the date of the transfer of money. ANSWER: All expenditures by Life Amendment Political Action Committee, South Dakota, are set forth on the reports filed with the South Dakota State Ethics Commission. 11. Please submit a copy of every brochure printed and/or distributed by LAPAC, S. D. which mentions in any manner the name(s) of a candidate for federal office. ANSWER: No brochures were printed or distributed by Life Amendment Political Action Committee, South Dakota which mentioned in any manner the names of any candidates for federal office to the best of my knowledge. -2-

12. Has your group ever made a contribution to a candidate for federal office. If so, state the name of the candidate and the amount of the contribution. ANSWER: No. Ellen Dang seg STATE OF SOUTH DAKOTA ) : SS COUNTY OF BROOKINGS On this the  $\underline{3}$  day of  $\underline{\mathcal{G}_{\text{con}}f}$ , 1979, before me, the undersigned officer, personally appeared Ellen Dempsey, known to me or satisfactorily proven to be the person whose name is subscribed to the within instrument and acknowledged that she executed the same for the purposes therein contained. In witness whereof I hereunto set my hand and official seal. Notary Public, South Dakota

214200

#### MAY, JOHNSON, DOYLE & BECKER, P.C.

COUNSELLORS AT LAW

412 WEST NINTH STREET

PO BOX 1443

SIOUX FALLS, SOUTH DAKOTA 57101

TELEPHONE

GEORGE O JOHNSON HAROLD C DOTLE JAMES R BECKER DERALD W WIEHL RICHARD MOE EDWARD I LEARY GARY D JENSEN ROBERT A MARTIN

R.G. MAI

September 19, 1979

CERTIFIED MAIL

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

Attention: William C. Oldaker

General Counsel

RE: MUR 960 - Life Amendment Political Action Committee,

South Dakota

Dear Mr. Oldaker:

In accordance with our letter to you of August 22, 1979 and our subsequent telephone conversation with Carolyn Weeder of your staff on September JO, 1979, we are enclosing original Affidavits of Ellen Dempsey, Kevin Conner and Jeanette Smith. We believe these Affidavits should clarify the answers to Interrogatories numbers 3, 4, 6 and 11 previously submitted by Life Amendment Political Action Committee - South Dakota to the Federal Election Commission and to substantiate that Committee's contention that the advertisement and the flyer referred to as Exhibits "B" and "D", respectively, in the above Complaint were not sponsored, distributed or paid for, either directly or indirectly, by the Life Amendment Political Action Committee - South Dakota. In the event that there are any questions or if further information is desired, please advise.

As I indicated in our telephone conversations with Ms. Weeder and in previous correspondence with the Commission, the delay in furnishing this information to the Commission is regretted but was frankly unavoidable. I was required to be out of my office between August 23-September 4. Upon my return, I had received additional information in answer to the Commission's inquiries from various people throughout the State of South Dakota. After reviewing the information, I had several questions which required extensive telephone conversations with the involved persons and some of them were out of town so a further delay resulted. After determining the facts, I then had to prepare the enclosed Affidavits and transmit them by mail to the three named persons who, in turn, returned the executed Affidavits to me. Because the parties live in different areas of the State, all the communication had to be either

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by mail or telephone which resulted in additional time being required to prepare the enclosed Affidavits. I trust this information will be of some assistance to the Commission in explaining the delay in furnishing the requested information.

Very truly yours,

MAY, JOHNSON, DOYLE & BECKER, P.C.

James R. Becker

JRB:sko

Enclosures

cc: Carolyn Weeder

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STATE OF SOUTH DAKOTA )

SS

AFFIDAVIT

COUNTY OF BROOKINGS

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ELLEN DEMPSEY, being first duly sworn on oath, deposes and says:

That she is a resident of White, South Dakota, and makes this Affidavit from her own personal knowledge except as to matters stated to be upon information and belief, and as to those matters, she believes the same to be true. That this Affidavit is made for the purpose of stating the facts known to her concerning an advertisement and a flyer setting forth the views concerning support for a Human Life Amendment of certain candidates for political office which is the subject of a Complaint (MUR 960) filed with the Federal Election Commission against the Life Amendment Political Action Committee, South Dakota ("LAPAC-SD") under date of April 30, 1979, by Gail M. Harmon on behalf of the National Abortion Rights Action League.

That attached hereto, marked Exhibits 1 and 2, and by this reference made a part hereof, are copies of an advertisement which was run in The Rapid City Guide on October 26, 1978 (Exhibit 1) and which was referred to in the aforementioned Complaint as Exhibit "B" and of the flyer (Exhibit 2) which was referred to in the aforementioned Complaint as Exhibit "D".

That your Affiant was, at all times relevant hereto, the Treasurer of LAPAC-SD and its only officer. That no other persons were authorized to act on behalf of LAPAC-SD and to her best knowledge, information and belief, no other person or persons acted on its behalf. That LAPAC-SD was organized for the purpose

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of disseminating views of candidates for state or local public office within South Dakota concerning abortion. That your Affiant advised pro-life people in various parts of South Dakota of the organization and existence of LAPAC-SD and of the fact that its activities were limited to candidates for public office on a state or local level only through mailings, handouts and by personal conversation; and that any political activity on behalf of candidates for public office on a national level were to be handled by and through an independent organization known as Life Amendment Political Action Committee with headquarters in Washington, D. C.

That your Affiant was not aware of the printing or dissemination of either Exhibits 1 or 2 at any time prior to their publication and distribution. That your Affiant believes that she first learned of the advertisement (Exhibit 1) which had been run in The Rapid City Guide on October 26. 1978, sometime thereafter but prior to October 30, 1978. She believes she became aware of the advertisement and its contents either by telephone conversation with someone in Rapid City who was familiar with the ad or upon receipt by her of the ad proofs from the printer. At the time that your Affiant became aware of the advertisement, she advised the responsible persons in Rapid City that such advertisement was improper in that LAPAC-SD could not disseminate the views of candidates for national public office and that any ads thereafter run in Rapid City over the name of LAPAC-SD involve only candidates for state or local public office. That your Affiant does not recall when she first became aware of the flyer (Exhibit 2) which had been distributed in Rapid City but believes it was sometime after the November 7, 1978 general election and was accordingly after its preparation and distribution.

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That attached hereto, marked Exhibits 3, 4, and 5, are copies of the Registration Form and Statement of Organization (Exhibit 3) filed by your Affiant on behalf of LAPAC-SD with the State Ethics Commission of South Dakota on August 17, 1978, and Report of Receipts and Expenditures (Exhibits 4 and 5), filed on November 1, 1978 and January 30, 1979 respectively with the State Ethics Commission of South Dakota. That such Registration Form and reports are true and correct to the best knowledge, information and belief of your Affiant. That all receipts and disbursements of LAPAC-SD were made by your Affiant, as its Treasurer and sole officer, and are accurately shown and set forth on said reports; that the disbursements shown on Exhibits 4 and 5 do not contain any disbursements to or for the benefit of any person connected with the preparation, publication or distribution of either the advertisement or flyer (Exhibits 1 and 2).

Ellen Dempsey

Subscribed and sworn to before me this /8th day of September, 1979.

Notary Public, South Dakota

(SEAL)

STATE OF SOUTH DAKOTA )

: SS

COUNTY OF PENNINGTON )

AFFIDAVIT

JEANETTE SMITH, being first duly sworn on oath, deposes and says:

That she is a resident of Rapid City, South Dakota, and makes this Affidavit from her own personal knowledge, except as to matters stated to be upon information and belief, and as to those matters, she believes the same to be true. That this Affidavit is made for the purpose of stating the facts concerning an advertisement setting forth the views concerning support for a Human Life Amendment of certain candidates for political office which is the subject of a Complaint filed with the Federal Election Commission against the Life Amendment Political Action Committee, South Dakota. ("LAPAC-SD") under date of April 30, 1979 (MUR 960) by Gail M. Harmon on behalf of the National Abortion Rights Action League.

That attached hereto, marked Exhibit 1, and by this reference made a part hereof, is a copy of an advertisement which was run in The Rapid City Guide on October 26, 1978, only and which was referred to in the aforementioned Complaint as Exhibit "B", which advertisement is the subject of this Affidavit.

That your Affiant, and other concerned pro-life people in the Rapid City,
South Dakota area became informed some time in mid to late October, 1978, that
any dissemination of candidates' views concerning the abortion issue could not be
made by South Dakota Right to Life Corporation or any of its affiliated chapters
because of a recent ruling by the Internal Revenue Service that such activity could
cause the loss of tax-exempt status by such organizations, and that a political action

committee had been established in South Dakota for the purpose of disseminating the views concerning abortion of candidates for state and local public office in the November, 1978 general election. Your Affiant and other pro-life people in the Rapid City, South Dakota area desired to disseminate information in the Rapid City, South Dakota area concerning the views on abortion of certain candidates for public office in that election. Because the election was drawing close, we were operating under severe time pressures and did not take the time to contact Ellen Dempsey, Treasurer of LAPAC-SD concerning the advertisement before it was run. We believed that any such advertisement had to be run over the name of LAPAC-SD, but we were not aware that LAPAC-SD was involved only in the dissemination of views of candidates for public office on the state and local level and was not involved in the dissemination of views of candidates for public office on a national level. Not until after the advertisement marked Exhibit 1 had Been run did we become aware of the fact that any dissemination of candidates' views concerning abortion for national public office was required to be done by Life Amendment Political Action Committee and not LAPAC-SD.

Donations were solicited from private individuals in the Rapid City area in late October, 1978 and on October 26, 1978, the advertisement marked Exhibit 1 was run in The Rapid City Guide. To the best of my knowledge, recollection and belief, the proofs of such ad were sent by The Rapid City Guide to Ellen Dempsey. Treasurer of LAPAC-SD, who received them after the ad was run. After she saw the proofs, Mrs. Dempsey informed us that any ads run over the name of LAPAC-SD could not contain any information concerning the views of candidates for national public office. To the best of my knowledge, information and belief, this was the

on October 26, 1978. Subsequent advertisements which we ran in <u>The Rapid City Guide</u>

Guide on November 2, 1978, and in <u>The Rapid City Journal</u> on October 29, 1978

and sometime in November, prior to the election, which were over the LAPAC-SD name disseminated only the views of candidates for state or local political office.

To the best of my knowledge, information and belief, the advertisements in The Rapid City Guide, including the October 26 advertisement, (Exhibit 1), cost \$120.00 which was paid for personally by your Affiant by check dated November 16, 1978 for which I was reimbursed from funds resulting from contributions from private individuals.

That after we realized the October 26, 1978 advertisement (Exhibit 1) was not proper, all subsequent advertisements run over the LAPAC-SD name concerned the views only of state and local candidates. To my best knowledge, information and belief, the October 26, 1978 advertisement (Exhibit 1) was not, in any way, sponsored, prepared, or run with the prior knowledge or consent of LAPAC-SD. Ellen Dempsey, its Treasurer, or anyone else on its behalf, but was sponsored, prepared and run in The Rapid City Guide on October 26, 1978 by myself and other interested and concerned persons in the Rapid City, South Dakota, area under the mistaken belief that such ads had to be run over the LAPAC-SD name and could include both candidates for national as well as state and local office. Ellen Dempsey, on behalf of LAPAC-SD, did not condone this advertisement and, in fact, called our attention to this error immediately after the ad was run when she first received knowledge of the contents of the ad. That the October 26, 1978 advertisement was

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not paid for with any funds received from or through LAPAC-SD nor was I reimbursed with monies for such advertisement from LAPAC-SD. Finally, no federal candidates endorsed in that advertisement consented to, cooperated with, requested or suggested the use of their names in that advertisement.

Jeanette Smith

Subscribed and sworn to before me this /7 day of September, 1979.

Notary Public South Dakota

aug. 17, 1984



# YOUR CANDIDATES

YOU are voting on a life or death issue! Who has the right to live?

All human bein	ngs.
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Just the planned, the privileged and the perfect.

ONLY a Human Life Amendment will restore the original spirit of the Constitution quarantaging the right to life to all human beings, born and unborn, young and old, advantaged and handicapped, weak and strong.

The following candidates support a Human Life Amend ment:

U.S. Senate: LARRY PRESSLER

U.S. House of Representatives: JAMES ABONCS

BOB SAMUELSON

South Dakota Governor: WILLIAM JANKLOW

South Dakota Lt. Governor: LOWELL HANSON

South Dakota Attorney General: MARK MEIERHE MAX GORS

South Dakota Senate: (Dist. 27) LYNDELL PETERSON

South Dakota House: (Dist. GUADON PEDERSON GEORGE CROUCH DON HAM OWEN CADY "

These candidates respect the rights of the defenseless.

They will respect yours!

VOTE PRO LIFE!

(This ad written, or ordered and paid for by LAPAC-SD (Life Amendment Political Action Committee, White, S.D. 57276), Ellen Dempsey,

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STATE OF SOUTH DAKOTA )

COUNTY OF PENNINGTON

AFFIDAVIT

KEVIN CONNER, being first duly sworn on oath, deposes and says:

That your Affiant resides at Rapid City, South Dakota and makes this Affidavit from his own personal knowledge, except as to those matters stated to be upon information and belief, and as to those matters, he believes the same to be true. That this Affidavit is made for the purpose of stating the facts in connection with a flyer referred to in the Complaint filed with the Federal Election Commission. against Life Amendment Political Action Committee, South Dakota (LAPAC-SD), under date of April 30, 1979 (MUR 960) by Gail M. Harmon on behalf of the National Aborton Rights Action League.

That attached hereto is a copy of the one-page flyer referred to in that Complaint as Exhibit "D", which copy is marked Exhibit 1, and by this reference made a part hereof.

That in late October, 1978, your Affiant and other pro-life youth in the Rapid City. South Dakota area, desired to publicize the views concerning abortion of candidates for public office in the November, 1978 election. Your Affiant was aware of the fact that South Dakota Right to Life Corporation and its affiliated local chapters could not engage in the dissemination of such views under a recent ruling of the Internal Revenue Service since such activity could cause the loss of such organization's tax-exempt status. Your Affiant was further aware that a political action committee had been formed in South Dakota for the purpose of disseminating the views of candidates for political office in South Dakota. Your Affiant believed

that any dissemination of such views was required to be made over the name of LAPAC.

Your Affiant caused to be prepared and printed a one-page flyer,

(Exhibit 1). At the time such flyer was prepared and distributed, your Affiant

was notaware that the activities of LAPAC-SD were limited to the dissemination of

views of candidates for public office on a state or local level and that LAPAC-SD

could not in any way involve itself with the views of candidates for public office

on a national level. Your Affiant also did not contact Ellen Dempsey, Treasurer of

LAPAC-SD, prior to the distribution of the flyer concerning its contents.

Your Affiant prepare Exhibit 1 and caused it to be published in Rapid City by Simpson's Creative Printers on or about October 23, 1978, which flyers were subsequently distributed before the November 7, 1978 election by himself and other pro-life youth throughout the Rapid City, South Dakota area. The printing costs for such flyers amounted to approximately \$40.00, which was paid by monies raised from private contributions on or about October 23, 1978.

O

That to the best knowledge, information and belief of your Affiant,

Ellen Dempsey. Treasurer of LAPAC-SD, was not aware of the nature or contents

of the flyer marked Exhibit 1 at any time prior to its publication and distribution

nor was that flyer sponsored, prepared, distributed, or paid for by LAPAC-SD or

anyone on its behalf; rather the flyer was sponsored, prepared, distributed and

paid for solely through the efforts of your Affiant and others acting on his behalf

having no connection with LAPAC-SD. Your Affiant did not receive any monies from

LAPAC-SD at any time for payment of the printing costs of the flyers or as reimbursement

for such such costs. Finally, no federal candidates endorsed in that flyer consented to, cooperated with, requested or suggested the use of their names in that flyer.

Kevin Conner

Subscribed and sworn to before me this /5 day of September, 1979.

Notary Public: South Dakota

(SEAL)



#### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

# CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. James R. Becker Counselor at Law 412 West Ninth Street P.O. Box 1443 Sioux Falls, South Dakota 57104

> RE: MUR 960 LAPAC, S.D.

Dear Mr. Becker:

C

On October , 1979, the Commission found no reasonable cause to believe that LAPAC, S.D. violated 2.U.S.C. \$441d by making expenditures expressly advocating the election of clearly identified federal candidates without statements of authorizatin/non-authorization by candidates endorsed.

After reviewing the available information, the Commission
determined that it appeared that local pro-life groups in South
Dakota used LAPAC, S.D.'s disclaimer without authorization in
publications expressly advocating the election of clearly identified
federal candidates without including statements of authorization/nonauthorization by these candidates endorsed. Such unauthorized use
of the disclaimer shall not hold LAPAC, S.D. liable for the violation.

Accordingly, LAPAC, S.D's involvement in this matter has been terminated. Should Eurther information come to your attention which you believe is relevant to the Commission's analysis of this matter, please contact Carolyn Weeder at (202) 523-4039.

Sincerely,

William C. Oldaker General Counsel



#### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

# CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Marion Edwyn Harrison Barnett, Alagia and Carey 1627 K Street, N.W. Washington, D.C. 20006

RE: MUR 960

Dear Mr. Harrison:

On October , 1979, the Commission determined there was reasonable cause to believe that your client, Life Amendment Political Action Committee, Inc. committed a violation of 2 U.S.C. section 44ld of the Federal Election Campaign Act of 1971, as amended. Specifically, the Commission found reasonable cause to believe that LAPAC, INC. violated 2 U.S.C. §44ld by making expenditures for communications expressly advocating the election of clearly identified federal candidates without properly displaying statements of authorization/non-authorization by candidates endersed.

In addition, the Commission determined to take no further action concerning LAPAC, Inc.'s possible violation of 2 U.S.C.

\$434 by failing to report the liquidation of a debt, and to take no further action in this matter regarding LAPAC, INC.'s failure to report LAPAC, S.D. and/or other local pro-life committees as affiliated organizations

The Commission has a duty to attempt to correct the above described violation of 2 U.S.C. §441d for a period of 30 days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. 2 U.S.C. section 437g(a)(5)(A). If we are unable to reach an agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute a civil suit in United States District Court and seek payment of a civil penalty.

Mr. Marion Edwyn Harrison Page 2 Enclosed is a conciliation agreement that this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it along with the civil penalty to the Commission within ten days. We will then recommend that the Commission approve the agreement. If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Carolyn Weeder, the staff member assigned to this matter, at 202/523-4039. Sincerely, William C. Oldaker General Counsel Enclosure 



#### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

# CERTIFIED MAIL RETURN RECEIPT REQUESTED

Ms. Jeanette Smith 606 E. Tallent Rapid City, D.S. 57701

RE: MUR 960

Dear Ms. Smith:

An investigation undertaken by the Federal Election Commission indicates that you took actions in connection with the November, 1978 federal election which were in violation of 2 U.S.C. §441d(2) of the Federal Election Campaign Act. This provision states:

Whenever any person makes an expenditure for the purpose of financing communications expressly advocating the election or defeat of a clearly identified candidate through any broadcasting station, newspaper, magazine, outdoor advertising facility, direct mailing, or any other type of general public political advertising, such communication --

(2) if not authorized by a candidate, his authorized political committees, or their agents, shall clearly and conspicuously, in accordance with regulations prescribed by the Commission, state that the communication is not authorized by any candidate, and state the name of the person who made or financed the expenditure for the communication, including, in the case of a political committee, the name of any affiliated or connected organization required to be disclosed under section 433(b)(2).

The investigation showed that while you paid for the publication of advertisements in the Rapid City Guide and The Rapid City Journal, these advertisements stated that they were "paid for" by the Life Amendment Political Action Committee of South Dakota. In order to comply with 2 U.S.C. §44ld you would have had to indicate that you or your local group "paid for" the publication of the advertisement, as well as stating whether or not the publication was authorized by a candidate.

Jeannette Smith Page 2 However, in view of the small amount of money involved and the apparently limited circulation of the publication, the Commission has decided to terminate its investigation without taking official action against you. This letter is to put you on notice that you have apparently acted in violation of the Federal Election Campaign Act and that you should be careful to abide by the provisions of that Act in order to avoid future Commission proceedings against you. Sincerely, William C. Oldaker General Counsel



#### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

# CERTIFIED MAIL RETURN RECEIPT REQUESTED

Kevin Conner

RE: MUR 960

Dear Mr. Conner:

An investigation undertaken by the Federal Election Commission indicates that you took actions in connection with the November, 1978 federal election which were in violation of 2 U.S.C. §441d(2) of the Federal Election Campaign Act. This provision states:

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The investigation indicated that while you paid for the publication of a handbill distributed in your local area, you had printed upon this publication that it was "sponsored by" the Life Amendment Political Action Committee (LAPAC). In order to comply with 2 U.S.C. §441d you would have had to indicate that you or your local group "sponsored" the publication of the handbill.

Kevin Conner Page 2

However, in view of the small amount of money involved and the apparently limited circulation of the publication, the Commission has decided to terminate its investigation without taking official action against you. This letter is to put you on notice that you have apparently acted in violation of the Federal Election Campaign Act and that you should be careful to abide by the provisions of that Act in order to avoid future Commission proceedings against you.

Sincerely,

William C. Oldaker General Counsel

79 SEF 24 AM 10: 29

MAY, JOHNSON, DOYLE & BECKER, P.C.

COUNSELLORS AT LAW

412 WEST NINTH STREET

PO BOX 1443

SIOUX FALLS, SOUTH DAKOTA 57101

September 19, 1979

CERTIFIED MAIL

R G MAY GEORGE O JOHNSON

HAROLD C IXINLE JAMES R RECKER

DERALD W WIEHI RICHARD MUE EDWARD I LEANY GARY D JENSEN

RUPLET A MARTIN

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

Attention: William C. Oldaker

General Counsel

RE: MUR 960 - Life Amendment Political Action Committee,

South Dakota

Dear Mr. Oldaker:

In accordance with our letter to you of August 22, 1979 and our subsequent telephone conversation with Carolyn Weeder of your staff on September 10, 1979, we are enclosing original Affidavits of Ellen Dempsey, Kevin Conner and Jeanette Smith. We believe these Affidavits should clarify the answers to Interrogatories numbers 3, 4, 6 and 11 previously submitted by Life Amendment Political Action Committee - South Dakota to the Federal Election Commission and to substantiate that Committee's contention that the advertisement and the flyer referred to as Exhibits "B" and "D", respectively, in the above Complaint were not sponsored, distributed or paid for, either directly or indirectly, by the Life Amendment Political Action Committee -South Dakota. In the event that there are any questions or if further information is desired, please advise.

As I indicated in our telephone conversations with Ms. Weeder and in previous correspondence with the Commission, the delay in furnishing this information to the Commission is regretted but was frankly unavoidable. I was required to be out of my office between August 23-September 4. Upon my return, I had received additional information in answer to the Commission's inquiries from various people throughout the State of South Dakota. After reviewing the information, I had several questions which required extensive telephone conversations with the involved persons and some of them were out of town so a further delay resulted. After determining the facts, I then had to prepare the enclosed Affidavits and transmit them by mail to the three named persons who, in turn, returned the executed Affidavits to me. Because the parties live in different areas of the State, all the communication had to be either

-2-

by mail or telephone which resulted in additional time being required to prepare the enclosed Affidavits. I trust this information will be of some assistance to the Commission in explaining the delay in furnishing the requested information.

Very truly yours,

MAY, JOHNSON, DOYLE & BECKER, P.C.

By James R. Becker

JRB:sko

Enclosures

cc: Carolyn Weeder

May, Johnson, Doyle & Becker, P. C.
Counsellors At Law
412 West Ninth Street
P. O. Box 1443
Sioux Falls, SD 57101



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

9:4200

#### MAY, JOHNSON, DOYLE & BECKER, P.C.

COUNSELLORS AT LAW

412 WEST NINTH STREET

N ) B N 1441

SIOUX FALLS. SOUTH DAKOTA 57101

HAROLD C OXIGE JAMES R RECKER DERALD & WIEND RICHARD MISE ETRIARD / LEADS GARY D. JENSEN IN PERT 4 MARTIN

# G MAY GELIRGE OF BUILDING IN

September 19, 1979

CERTIFIED MAIL

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

Attention: William C. Oldaker

General Counsel

RE: MUR 960 - Life Amendment Political Action Committee,

South Dakota

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Very truly yours,

MAY, JOHNSON, DOYLE & BECKER, P.C.

By James R. Becker

JRB:sko
Enclosures
cc: Carolyn Weeder

STATE OF SOUTH DAKOTA )

SS

AFFIDAVIT

COUNTY OF BROOKINGS

ELLEN DEMPSEY, being first duly sworn on oath, deposes and says:

That she is a resident of White, South Dakota, and makes this Affidavit from her own personal knowledge except as to matters stated to be upon information and belief, and as to those matters, she believes the same to be true. That this Affidavit is made for the purpose of stating the facts known to her concerning an advertisement and a flyer setting forth the views concerning support for a Human Life Amendment of certain candidates for political office which is the subject of a Complaint (MUR 960) filed with the Federal Election Commission against the Life Amendment Political Action Committee, South Dakota ("LAPAC-SD") under date of April 30, 1979, by Gail M. Harmon on behalf of the National Abortion Rights Action League.

That attached hereto, marked Exhibits 1 and 2, and by this reference made a part hereof, are copies of an advertisement which was run in The Rapid City Guide on October 26, 1978 (Exhibit 1) and which was referred to in the aforementioned Complaint as Exhibit "B" and of the flyer (Exhibit 2) which was referred to in the aforementioned Complaint as Exhibit "D".

That your Affiant was, at all times relevant hereto, the Treasurer of LAPAC-SD and its only officer. That no other persons were authorized to act on behalf of LAPAC-SD and to her best knowledge, information and belief, no other person or persons acted on its behalf. That LAPAC-SD was organized for the purpose

2

of disseminating views of candidates for state or local public office within South Dakota concerning abortion. That your Affiant advised pro-life people in various parts of South Dakota of the organization and existence of LAPAC-SD and of the fact that its activities were limited to candidates for public office on a state or local level only through mailings, handouts and by personal conversation; and that any political activity on behalf of candidates for public office on a national level were to be handled by and through an independent organization known as Life Amendment Political Action Committee with headquarters in Washington, D. C.

That your Affiant was not aware of the printing or dissemination of either Exhibits 1 or 2 at any time prior to their publication and distribution. That your Affiant believes that she first learned of the advertisement (Exhibit 1) which had been run in The Rapid City Guide on October 26, 1978, sometime thereafter but prior to October 30, 1978. She believes she became aware of the Jvertisement and its contents either by telephone conversation with someone in Rapid City who was familiar with the ad or upon receipt by her of the ad proofs from the printer. At the time that your Affiant became aware of the advertisement, she advised the responsible persons in Rapid City that such advertisement was improper in that LAPAC-SD could not disseminate the views of candidates for national public office and that any ads thereafter run in Rapid City over the name of LAPAC SD involve only candidates for state or local public office. That your Affiant does not recall when she first became aware of the fiyer (Exhibit 2) which had been distributed in Rapid City but believes it was sometime after the November 7. 1978 general election and was accordingly after its preparation and distribution.

That attached hereto, marked Exhibits 3, 4, and 5, are copies of the Registration Form and Statement of Organization (Exhibit 3) filed by your Affiant on behalf of LAPAC-SD with the State Ethics Commission of South Dakota on August 17, 1978, and Report of Receipts and Expenditures (Exhibits 4 and 5), filed on November 1, 1978 and January 30, 1979 respectively with the State Ethics Commission of South Dakota. That such Registration Form and reports are true and correct to the best knowledge, information and belief of your Affiant. That all receipts and disbursements of LAPAC-SD were made by your Affiant, as its Treasurer and sole officer, and are accurately shown and set forth on said reports; that the disbursements shown on Exhibits 4 and 5 do not contain any disbursements to or for the benefit of any person connected with the preparation, publication or distribution of either the advertisement or flyer (Exhibits 1 and 2).

Ellen Dempsey

Subscribed and sworn to before me this 18th day of September, 1979.

Notary Public, South Dakota

(SEAL)

11 B 11



# ATTENTION ALL VOTERS IN SELECTING YOUR CANDIDATES

YOU are voting on a life or death issue!

All human t	eings.
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Just the planned, the privileged and the periect.

ONLY a Human Life Amendment will restore the original spirit of the Constitution quaranteeing the right to life to all human beings, born and uncorn, young and old, advantaged and handicapped, weak and strong.

The following candidates support a Human Life Amendment:

U.S. Senate: LARRY PRESSLER

U.S. House of Representatives: JAMES ABONOR BOB SAMUELSON

South Dakota Governor: WILLIAM JANKLOW

South Dakota Lt. Governor: LOWELL HANSON

South Dakota Attorney General: MARK METERHENRY MAX GORS

Stata Treas .: DAVID VOLK

South Dakota Senate: (Dist. 27) LYNDELL PETERSON South Dakota House: (Dist. 27)
GORDON PEDERSON
GEORGE CROUCH
DON HAM
OWEN CADY

These candidates respect the rights of the defenseless.

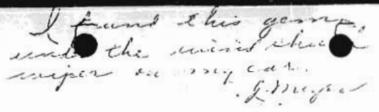
They will respect yours!

#### VOTE PRO LIFE!

(This ad written, or a dered and paul for by LAPACSD (Life Ameniment Political Action Committee, White, S.D. 57276), Ellen Dempsey, Treas.)



THIS NOVEMBER IN





# A Vote For These Candidates Is

### A VOTE FOR LIFE

The following candidates support a Human Life Amendment to end the killing of unborn children and guarantee the constitutional right of all human beings to life irrespective of age, health, function or condition of dependancy.

For Governor:

WILLIAM JANKLOW?

For Atty, General

MARK MEIERHENRY

MAX GORS

For Lt. Governor:

LOWELL HANSEN IL

For St. Treasurer:

DAVID VOLK

For U.S. Senate:

ARRY PRESSIER +

For U.S. House of Rep. JAMES ABONDA -

BOB SAMUELSON LA.

For South Dakota Senate - Dist. 27

LYMPELL PETERSON

For South Dakota House - Dist. 27

\* GORDON PEDERSON

DWEN CADY

KATULEEN PERRIGO

SEORGE CROUCH

Fall elected

### VOTE FOR THOSE WHO VALUE LIFE — THEY WILL VALUE YOURS!

Sponsored by LAPAC (Life Amendment Political Action Committee), Hq., White, SD

#### STATEMENT BY THE RAPID CITY YOUTH FOR LIFE:

We are distributing this tot for LAPAC because THE SUPREME COURT DOES NOT SPEAK FOR US on abortion.

We believe every homen band has the right to his other journey torough life.

We believe these who are weak roust be helped by the strong at all stages of life.

We believe our elected officials must have the intelligence, integrity and distermination to solve social problems without resorting to the inhumane solution of killing the helplass.

We are triad to give our time and efforts to work for these conditates who have photost their support of a Human Life Amendment

Rapid City Youth For Life

If you share our concurr and wish to join or hispin any view, call 342-6135.

WELOVE LIFE!

Rapid City, S. Duk 577-1

#### REGISTRATION FORM AND STATEMENT OF ORGANIZATION

AUG 1 7 1976

Secretary of State

1

Return Completed Forms to:

Executive Director State Ethics Commission Office of Secretary of State Capitol Building Pierre, South Dakota 57501 (605) 224-3537 NNew Registration

| |Registration Amendment

I.D. No. [

(For office use only)

Within fifteen days after receiving contributions or making expenditures in the amount of \$100, or more, all political committees and any person who is not a candidate or a member of a political committee that are required to file state campaign financing statements pursuant to SDCL 12-25-13 and SDCL 12-25-19, must file this statement with the State Ethics Commission.

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South Do	Kota (LA	PAC- S. L	Da K.)	
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Mailing address				
Telephone number .		-		
3. Full name of treasur	w Ellon I	Denipsey		
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6. If this conomittee so affiliation.	pports a selected candidate	or candidates, list then	by name, offic	e sought and party
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	TIFICATION is Registration F	TIFICATION  is Registration Form and State	e information, attach appropriately labeled control of Organic Registration Form and Statement of Organic (Signed)

# RECEIVED

#### STATE ETHICS COMMISSION.

Secretary of State

Report of Receipts and Expenditures

Life amendment Political action Committee-South Dake

	(Full Name of Candidate or Committee)
POI Ellen	Sempsey Treasurer
white, So	(City, State, ZIP Code)
W. 10	(my, mac, m) chacy
25	TYPE OF REPORT
[ ] 7th Day Report Preceding Finnary E. [ ✓ 7th Day Report Preceding General E. [ ] January 30th Report	lection on November 7, 1978
(Year)	
Termination Report Amendment of	Report
[ ] Amenament or	Topon
	nailing address in which you hold campaign accounts and deposit campaign funds.
Front National Bay	ak, Brookings, S. D. 57006
TOTAL AND RELATIONS AT AN ARCHIVE	
I declare that I have examined this report	t and to the best of my knowledge and belief it is true, correct and complète.
	Ellen Denney - Treas Signature of Candidate or Committee Treasurer
	Signature of Candidate or Committee Treasurer
Colorada da da como do la Como de	3/26 day of Octobe 19 7/1.
Subscribed and sworn to before me this_	
(SEAL)	Robert D. Colour
10 mm	Noting Public Officer Administering Outh  Ly Commission Expires  August 37, 1986
	Ly Commission Expires
90 W	1-3.4 37 1986
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V	STATE ETHICS COMMISSION
	Office of Secretary

of State

#### STATEMENT OF CASH TRANSACTIONS

1.	Beginning Cash Balance	5. No. 1		500
2.	Itemized Contributions (Schedule A, Page 3)		\$ 100,00	20 10 M
3.	Loan Proceeds (Schedule B, Page 4)	100	5	
4.	Transfer/Event Proceeds (Schedule C, Page 4)	10	\$ 326.09	
5.	Unitemized Contribution (Total Only)	22	\$ 709.00	
6.	Total Cash Receipts			s 1/35.09
	(H)			
7.	Total Cash Available	Ex	17.5	\$ 1135.09
8.	Expenses (Schedule D, Page 4)	14	\$ 864.07	***
9.	Payment on Loans This Period (Schedule E, Page 5)		5	
7.	Tayment on Boans This Ferrod (Sententie 13, Fige 3)		3	
10.	Total Cash Disbursements			8 864.07
	C. I. D. I.		4	. 171 - 2
11.	Ending Cash Balance		0.5	\$ 271,02
TL.	STATEMENT OF IN-KIND	CONTRIBUTION	VS.	
4	the second of th	. 129		
<b>4</b> 12.	Total Value of In-Kind Contributions (Schedule F, Pa	age 5)		5 540.43
~			100	
-	STATEMENT OF CAMPAIC Assets	IN FUND STATI	JS .	
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σ <sub>13.</sub>	Cash Balance	15		5 271.02
14.	Other Assets (Savings Accounts, CD's, Stocks, Etc.)			
C .	Other Hasers Coursella Headening, 600 of Ottober, 1960.)			9
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C <sub>15.</sub>	Add 13 and 14 together			5 271.02
C	Liabilities and B	alance		
			5	a 9
716.	Accounts and Loans Payable (Schedule G, Page 6)			\$
17.	Balance			s 271.02
17.	Dalance		100	0

#### INSTRUCTIONS

#### Line No.

- Beginning Cash Balance-This amount must agree with the Ending Cash Balance (Line 11) from the last finance report filed.
- 2. Itemized Contribution-List all contributions of \$100 or more (Schedule A, Page 3)
- Transfer/Event Proceeds- List all transfers from other committees and proceeds from fund raising events (Schedule C, Page 4)
- 5. Unitemized Contributions-Total of Contribution under \$100.
- 6. Total Cash Receipts-Line 2 + 3 + 4 + 5.
- 7. Total Cash Available-Line 1 + 6.
- Total Cash Disbursements-Line 8 + 9;
- 11. Ending Cash Balance-Line 7 10. This amount must equal Line 13.
- 12. Total Value of In-Kind Contributions-Total of Schedule F, Page 5.
- 14. Other Assets-Do not list office furniture and equipment.
- 16. Accounts and Loans Payable-Total Schedule G, Page 6.
- 17. Balance-Subtract Line 16 from Line 15.

Page 1

#### ITEMIZED CONTRIBUTIONS

List the name, residence address and principal place of employment of any person who contributed \$100, or more and the amount contributed by that person during the reporting period and aggregate year to date.

DATE Month. Day, Year	NAME AND ADDRESS	PRINCIPAL PLACE OF EMPLOYMENT	AMOUNT OF CONTRIBUTION This Aggregate Period year to date	
20/11/78	Mr. & Mrs Harvey Buhl 320 W. Dukota Pience, S. O. 57501	Own Laundry Chain	\$100.00 \$100.5	
2		*		

SHEDIST REPORT CO.	E15840*	
Page	- 6	
rage	01	

Transfer total to Summary Page - Line 2

9 7 2 1 6 1 0 1 0 0

#### SCHEDULE B LOAN PROCEEDS

List name and address of the Bank, name and address of the cosigner and/or guarantors of the note and the amount of the loan.

DATE .	NAME AND ADDRESS OF BANK AND COSIGNERS/GUARANTORS				TAUOMA	
QIET EN			¥7		* *	
			275			
N. W. T.						

Transfer Total to Summary Page - Line 3

#### SCHEDULE C TRANSFERS. EVENT PROCEEDS

List the source and amount of transfers from other committees and/or accounts, and the total proceeds from fund raising events including the date, location and type of event.

DATE	SOURCE OR LOCATION AND TYPE OF EVENT	AMOUNT
-10-78 /8-19-78	Sale of Ruffle tickets	326.09
in the second		

Transfer Total to Summary Page - Line 4

#### SCHEDULE D EXPENSES

List the amount, purpose, date and check number of all expenditures and the name of each payer.

DATE	CHECK NO.	PAYEE	PURPOSE	AMOUNT
		Sheet attached		
	€ .			
	e 10 W			

Tensit Total to Summary Page Life 8 U O

- 1		· Schedule D	Eypenses	
ate C	Llick Do.	Payee	Purpose	amount
9 - 78	101	Index	Bookkeeping Supplies	11.89
7-78	103	-> Harold's Printing	Printing	18.72
25-78	102	White Postmaster	Bulk Mailing Dermit + Po	100
2-78	104		^ .	15.00
26-78	-	First Nat'l Bank	Check Printing	9.90
-11-78	105	White Postmaster		250.00
-10-78	106	Index	Office Supplies	14.19
-11-78	107	Reynold's Printin	^	5.42
-11-78	108		3	38.63
-1K-78.		Mipple Printing may, Johnson Doyles Fisher, P.C.	Lawyer Service	s 10.64.
- ज्ञा- 78		South Oab. Right to L	Λ .	78.00
-23-78		White Postmas		. 15.00
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Karen Prochnick

- Harold's Printing

Insty Paints ...

White Postmater

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0-23-18

0-07-78

0-30-78

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115

#864.0

4825

100.0

30.00

74.93

S. D.R.L. advertising

Printing Printing

Postage

# SCHEDULE E PAYMENT ON LOANS DURING THIS PERIOD

List the date, check number and names of the payees and the amounts of the loan repayments during this reporting period.

DATE	CHECK NO.		PAYEE AND ADDRESS	TAUOUA
		et 2	<b>X</b>	
	Station			

Transfer Total to Summary Page - Line 9

TOTAL S (Last Page Only)

#### SCHEDULE F IN-KIND CONTRIBUTIONS

List the information as to the nature of the good or services provided, the name and address of the persons ,who provided them, and the fair market values if \$100 or more.

NAME AND ADDRESS	NATURE OF GOODS/SERVICES	VALUE
Seatt Reardon, 320 E. 27th, Sieux, Fulls, S. D. 57105	Paid adventizing	540.43

Page\_\_\_of\_\_\_

Transfer Total to Summary Page - Line 12

Total This Period S 5 40.43 (Last Page Only)

6 7 2 1 6 1 6 7 6 9

#### ACCOUNTS AND LOANS PAYABLE

List information as to the names and addresses of the creditors, date in which loan and/or debt incurred, the amount of the original loan and/or debt, cumulative payment to date and outstanding and/or principal balances owed.

Section of the sectio				
DATE INCURRED	NAME AND ADDRESS	AMOUNT OF ORIGINAL LOAN	CUMULATIVE PRINCIPAL PAYMENT TO DATE	OUTSTANDING BALANCE AT CLOSE OF THIS PERIOD
	Du S			

age\_\_\_of\_\_\_

Transfer Total to Summary Page - Line 16

Total This Period S (Last Page Only)

09216101000

Page

Secretary of State

#### STATE FTHICS COMMISSION

Report of Receipts and Expenditures

	Life amadment Politice	1 action Committee	- South Dakot
		lidate or Committee)	
	R. Rt. 1 Dempsey - isi	Treusurer	
	4. 4		
		~ 57276 c, ZIP Code)	
	TYPE OF	REPORT	*
7th   Jan     Ter     Am List all	mination Report  banks or other depositories and mailing address in which starts are starts are starts and mailing address in which starts are starts are starts are starts and mailing address in which starts are starts are starts and mailing address are starts are starts are starts are starts and mailing address are starts are s	Report	180 (SE)
			.5
I doclare	e that I have examined this report and to the best of n	y knowledge and belief it is true, co	rect and complete.
		Elle Des Signature of Candidate	or Committee Treasurer
Subscrib	bed and sworn to before me this 22 day of		
(SEAL)	· ·	Theiles to	
	197	O	ficer Administering Gath

Filed this 30 day of 19/1 STATE STITIES COMMISSION Office of Secretary of State



#### STATEMENT OF CASH TRANSACTIONS

1.	Beginning Cash Balance		7.4	\$ 271.02
2. 3. 4. 5. 6.	Itemized Contributions (Schedule A, Page 3) Loan Proceeds (Schedule B, Page 4) Transfer/Event Proceeds (Schedule C, Page 4) Unitemized Contribution (Total Only) Total Cash Receipts		\$ 437.9° \$ 100.0 \$ 396.5	0
7.	Total Cash Available	-		\$ 1205.56
8. 9.	Expenses (Schedule D, Page 4) Payment on Loans This Period (Schedule E, Page 5	)	\$ 961.11	_
10.	Total Cash Disbursements			s 41.1.11
11.	Ending Cash Balance	12		\$ 244.45
C.	STATEMENT OF IN-KIN	D CONTRIBUTIO	NS	3:
∟ 12.	Total Value of In-Kind Contributions (Schedule F.	, Page 5)		\$ 703.50
-	STATEMENT OF CAMPA		rus .	12
_ 13.	Cash Balance			5 244.45
c 14.	Other Assets (Savings Accounts, CD's, Stocks, Etc.	.)		100
~				- S
c 15.	Add 13 and 14 together  Liabilities and	d Balance		5 244.45
16.	Accounts and Loans Payable (Schedule G, Page 6)			s
17.	Balance		*	5 244.45
	(C)			

#### INSTRUCTIONS

#### Line No.

- Beginning Cash Balance-This amount must agree with the Ending Cash Balance (Line 11) from the last finance report filed.
- 2. Itemized Contribution-List all contributions of \$100 or more (Schedule A, Page 3)
- Transfer/Event Proceeds- List all transfers from other committees and proceeds from fund raising events (Schedule C, Page 4)
- 5. Unitemized Contributions-Total of Contribution under \$100.
- 6. Total Cash Receipts-Line 2 + 3 + 4 + 5.
- 7. Total Cash Available-Line 1 + 6.
- 10. Total Cash Disbursements-Line 8 + 9.
- 11. Ending Cash Balance-Line 7 10. This amount most equal Line 13.
- 12. Total Value of In-Kind Contributions-Total of Schedule F, Page 5.
- Other Assets-Do not list office furniture and equipment.
- 16. Accounts and Loans Payable-Total Schedule G, Page 6.
- Balance-Subtract Line 16 from Line 15.

Page 4

List the name, residence address and principal place of employment of any person who contributed \$100, or more and the amount contributed by that person

DATE Month. Day, Year	NAME AND ADDRESS	PRINCIPAL PLACE OF EMPLOYMENT	AMOUNT OF CONTRIBUTION This Aggregate Period year to date
11-7-78 29-78 12-28-78 1-9-79 1-15-79	Lois Buns Elkton, S.D.  Tranette Smith box E. Tellent, Repid City of  Maxmas. Tom Martin 5 27-17th St. S. Broom  Pat Cassell R.R. I Volga. SD- 57071  LIDAR Hunca Fundamining Chilis	Francwife 1701 - Repid Fundraising Kings attorney Francwife	100.00 100.00
		٥	**
		= B B	

A CONTRACT	Valle - 254	
Page_	of	E2.C

during the reporting period and aggregate year to date.

TOTAL THIS PERIOD S 437 97
(Last page only)

Transfer total to Summary Page - Line 2

List name and address of the Bank, name and address of the cosigner and/or guarantors of the note and the amount of the loan.

Transfer Total to Summary Page - Line 3

#### SCHEDULE C TRANSFERS/EVENT PROCEEDS

List the source and amount of transfers from other committees and/or accounts, and the total proceeds from fund raising events including the date, location and type of event.

DATE	SOURCE OR LOCATION AND TYPE OF EVENT	AMOUNT
1-15-79	LAPAC-Huron Fundraising . C.h 1: Supper	100.00
		1

Transfer Total to Summary Page - Line 4

#### SCITEDULE D EXPENSES

List the amount, purpose, date and check number of all expenditures and the name of each payee.

DATE	CHECK NO.	· PAYEE '	PURPOSE	AMOUNT
		Sheet attached		M24 (=
	H .			

Pace of

Transfer Total to Summary Page - Line 8

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	Date	Theak Ho.	Payee	Curnose	Amount
39	10-31-78 11-3-78 11-29-75 11-20-78 11-28-78 11-29-7	116 117 118 119 120 121	white Postmaster Euron Fublishing Co. Interstate Office Products Rey old's Printing Carol Coveig 3.D. Right to Life	Printing Pole. & Service Printing &	
	1.2-18-78 1-24-79 1-24-79	122 123 12h	Karen Prochaick James Becker William Dempsey	Tele. & Postar Cele. Helmburs Tele. Reimburs	o 56.111. ed 26.117

# SCHEDULE E PAYMENT ON LOANS DURING THIS PERIOD

List the date, check number and names of the payees and the amounts of the loan repayments during this reporting period.

DATE	CHECK NO.	PAYEE AND ADDRESS	AMOUNT
		*	
			4
	A		
	5997	· ·	
TO SECOND	or Charles		

Transfer Total to Summary Page - Line 9

TOTAL S (Last Page Only)

#### SCHEDULE F IN-KIND CONTRIBUTIONS

List the information as to the nature of the good or services provided, the name and address of the persons who provided them, and the fair market values if \$100 or more.

NAME AND ADDRESS	NATURE OF GOODS/SERVICES	VALUE
10-27-78 abendeen Fundraising 10-31-78 Rupid City Fudraising 11-1-78 Minnehala aren Fundraising Project 11-1-78 Scott Remoder 320 6 27 Sions Fulls 57105	advertising Reductising Pamphlets Advertising	710.88 242.32 159.18 151.20

Page of\_

Transfer Total to Summary Page - Line 12

Total This Period S 703,50 (Last Page Only)

#### ACCOUNTS AND LOANS PAYABLE

List information as to the names and addresses of the creditors, date in which loan and/or debt incurred, the amount of the original loan and/or debt, cumulative payment to date and outstanding and/or principal balances owed.

DATE	NAME AND ADDRESS LOA	NAL PAYMENT TO CLOSE OF
•		

	3535	
Page	0110	
Car Carried		

Transfer Total to Summary Page - Line 16

Total This Period S (Lost Page Only)

STATE OF SOUTH DAKOTA )
: SS
COUNTY OF PENNINGTON )

AFFIDAVIT

JEANETTE SMITH, being first duly sworn on oath, deposes and says:

That she is a resident of Rapid City, South Dakota, and makes this Affidavit from her own personal knowledge, except as to matters stated to be upon information and belief, and as to those matters, she believes the same to be true. That this Affidavit is made for the purpose of stating the facts concerning an advertisement setting forth the views concerning support for a Human Life Amendment of certain candidates for political office which is the subject of a Complaint filed with the Federal Election Commission against the Life Amendment Political Action Committee, South Dakota, ("LAPAC-SD") under date of April 30, 1979 (MUR 960) by Gail M. Harmon on behalf of the National Abortion Rights Action League.

That attached hereto, marked Exhibit 1, and by this reference made a part hereof, is a copy of an advertisement which was run in <u>The Rapid City Guide</u> on October 26, 1978, only and which was referred to in the aforementioned Complaint as Exhibit "B", which advertisement is the subject of this Affidavit.

That your Affiant, and other concerned pro-life people in the Rapid City, South Dakota area became informed some time in mid to late October, 1978. that any dissemination of candidates' views concerning the abortion issue could not be made by South Dakota Right to Life Corporation or any of its affiliated chapters because of a recent ruling by the Internal Revenue Service that such activity could cause the loss of tax-exempt status by such organizations, and that a political action

committee had been established in South Dakota for the purpose of disseminating the views concerning abortion of candidates for state and local public office in the November, 1978 general election. Your Affiant and other pro-life people in the Rapid City, South Dakota area desired to disseminate information in the Rapid City, South Dakota area concerning the views on abortion of certain candidates for public office in that election. Because the election was drawing close, we were operating under severe time pressures and did not take the time to contact Ellen Dempsey, Treasurer of LAPAC-SD concerning the advertisement before it was run. We believed that any such advertisement had to be run over the name of LAPAC-SD, but we were not aware that LAPAC-SD was involved only in the dissemination of views of candidates for public office on the state and local level and was not involved in the dissemination of views of candidates for public office on a national level. Not until after the advertisement marked Exhibit 1 had been run did we become aware of the fact that any dissemination of candidates' views concerning abortion for national public office was required to be done by Life Amendment Political Action Committee and not LAPAC-SD.

Donations were solicited from private individuals in the Rapid City area in late October, 1978 and on October 26. 1978, the advertisement marked Exhibit I was run in The Rapid City Guide. To the best of my knowledge, recollection and belief, the proofs of such ad were sent by The Rapid City Guide to Ellen Dempsey, Treasurer of LAPAC-SD, who received them after the adwas run. After she saw the proofs, Mrs. Dempsey informed us that any ads run over the name of LAPAC-SD could not contain any information concerning the views of candidates for national public office. To the best of my knowledge, information and belief, this was the

on October 26, 1978. Subsequent advertisements which we ran in <u>The Rapid City Guide</u>

Guide on November 2, 1978, and in <u>The Rapid City Journal</u> on October 29, 1978

and sometime in November, prior to the election, which were over the LAPAC-SD name disseminated only the views of candidates for state or local political office.

To the best of my knowledge, information and belief, the advertisements in The Rapid City Guide, including the October 26 advertisement. (Exhibit 1). cost \$120.00 which was paid for personally by your Affiant by check dated November 16, 1978 for which I was reimbursed from funds resulting from contributions from private individuals.

That after we realized the October 26, 1978 advertisement (Exhibit 1) was not proper, all subsequent advertisements run over the LAPAC-SD name concerned the views only of state and local candidates. To my best knowledge, information and belief, the October 26, 1978 advertisement (Exhibit 1) was not, in any way, sponsored, prepared, or run with the prior knowledge or consent of LAPAC-SD, Ellen Dempsey, its Treasurer, or anyone else on its behalf, but was sponsored, prepared and run in <a href="#">The Rapid City Guide</a> on October 26, 1978 by myself and other interested and concerned persons in the Rapid City, South Dakota, area under the mistaken belief that such ads had to be run over the LAPAC-SD name and could include both candidates for national as well as state and local office. Ellen Dempsey, on behalf of LAPAC-SD, did not condone this advertisement and, in fact, cailed our attention to this error immediately after the ad was run when she first received knowledge of the contents of the ad. That the October 26, 1978 advertisement was

not paid for with any funds received from or through LAPAC-SD nor was I reimbursed with monies for such advertisement from LAPAC-SD. Finally, no federal candidates endorsed in that advertisement consented to, cooperated with, requested or suggested the use of their names in that advertisement.

hette Smith

Subscribed and sworn to before me this /7 day of September, 1979.

aug. 17, 1984

"B"



# ATTENTION ALL VOTERS IN SELECTING YOUR CANDIDATES

YOU are voting on a life or death issue!

\_\_ All human beings.

Just the planned, the privileged and the periect.

ONLY a Human Life Amendment will restore the original spirit of the Constitution quaranteeing the right to life to all human beings, born and unborn, young and old, advantaged and handicapped, weak and strong.

The following candidates support a Human Life Amendment:

U.S. Senate: LARRY PRESSLER

U.S. House of Representatives: JAMES ABONOR BOB SAMUELSON

South Dakola Governor: WILLIAM JANKLOW

South Dakota Lt. Governor: LOWELL HANSON

South Dakota Alterney General: MARK MCIERHENRY MAX GORS

State Treas.: DAVID VOLK

South Dakota Senate: (Dist. 27) LYNDELL PETERSON South Dakota House: (Dist. 27)
GORDON PEDERSON
GEORGE CROUCH
DON HAM
OWEN CADY

These candidates respect the rights of the defenseless.

They will respect yours!

VOTE PRO LIFE!

CThis of written, or ordered and paid for by LAPAC-SD Hafe Amendment Political Action Committee, White, S.D. 572761, Ellen Dempsey, Trans. 1



STATE OF SOUTH DAKOTA )
: SS
COUNTY OF PENNINGTON )

AFFIDAVIT

KEVIN CONNER, being first duly sworn on oath, deposes and says:

Affidavit from his own personal knowledge, except as to those matters stated to be upon information and belief, and as to those matters, he believes the same to be true. That this Affidavit is made for the purpose of stating the facts in connection with a flyer referred to in the Complaint filed with the Federal Election Commission, against Life Amendment Political Action Committee, South Dakota (LAPAC SD), under date of April 30, 1979 (MUR 960) by Gail M. Harmon on behalf of the National Aborton Rights Action League.

That attached hereto is a copy of the one-page flyer referred to in that Complaint as Exhibit "D", which copy is marked Exhibit 1, and by this reference made a part hereof.

That in late October, 1978, your Affiant and other pro-life youth in the Rapid City. South Dakota area, desired to publicize the views concerning abortion of candidates for public office in the November, 1978 election. Your Affiant was aware of the fact that South Dakota Right to Life Corporation and its affiliated local chapters could not engage in the dissemination of such views under a recent ruling of the Internal Revenue Service since such activity could cause the loss of such organization's tax-exempt status. Your Affiant was further aware that a political action committee had been formed in South Dakota for the purpose of disseminating the views of candidates for political office in South Dakota. Your Affiant believed

0047191751

that any dissemination of such views was required to be made over the name of LAPAC.

Your Affiant caused to be prepared and printed a one-page flyer,

(Exhibit 1). At the time such flyer was prepared and distributed, your Affiant
was not aware that the activities of LAPAC-SD were limited to the dissemination of
views of candidates for public office on a state or local level and that LAPAC-SD

could not in any way involve itself with the views of candidates for public office
on a national level. Your Affiant also did not contact Ellen Dempsey, Treasurer of
LAPAC-SD, prior to the distribution of the flyer concerning its contents.

Your Affiant prepare Exhibit 1 and caused it to be published in Rapid
City by Simpson's Creative Printers on or about October 23, 1978, which flyers
were subsequently distributed before the November 7, 1978 election by himself
and other pro-life youth throughout the Rapid City, South Dakota area. The printing
costs for such flyers amounted to approximately \$40.00, which was paid by monies
raised from private contributions on or about October 23, 1978.

That to the best knowledge, information and belief of your Affiant,

Ellen Dempsey. Treasurer of LAPAC-SD, was not aware of the nature or contents

of the flyer marked Exhibit 1 at any time prior to its publication and distribution

nor was that flyer sponsored, prepared, distributed, or paid for by LAPAC-SD or

anyone on its behalf; rather the flyer was sponsored, prepared, distributed and

paid for solely through the efforts of your Affiant and others acting on his behalf

having no connection with LAPAC-SD. Your Affiant did not receive any monies from

LAPAC-SD at any time for payment of the printing costs of the flyers or as reimbursement

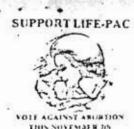
for such such costs. Finally, no federal candidates endorsed in that flyer consented to, cooperated with, requested or suggested the use of their names in that flyer.

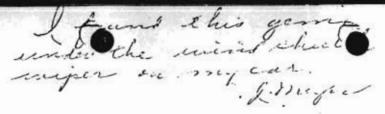
Kevin S. Corner

Subscribed and sworn to before me this /5 day of September, 1979.

Notary Public, South Dakota

(SEAL)







# A Vote For These Candidates Is

# A VOTE FOR LIFE

The following candidates support a Human Life Amendment to end the killing of unborn children and guarantee the constitutional right of all human beings to life irrespective of age, health, function or condition of dependency.

For Governor:

WILLIAM JANKLOW

For Atty. General

MARK MEIERHENRY

MAX GORS

For Lt. Governor:

LOWELL HAMSEN II

For St. Treasurer:

DAVID VOLK

For U.S. Senate:

LABRY PRESSUER

For U.S. House of Rep. JAMES ABOYON

BOB SAMUELSON LA. E.

1

For South Dakota Senate - Dist. 27

LYMOELL PETERSON

For South Dakota House - Dist. 27

DOM HAM

KATULEEN PERRIGO

OWEN CADY

\_€ GEORGE CΩOUCH

to all elected

## VOTE FOR THOSE WHO VALUE LIFE — THEY WILL VALUE YOURS!

Sponsored by LAPAC (Life Amendment Political Action Committee), Hq., White, SE

#### STATEMENT BY THE RAPID CITY YOUTH FOR LIFE:

We are distributing this list for LAPAC because THE SUPREME COURT DOES NOT SPEAK FOR US on abortion.

We believe early human bond has the right to his or ner journey torough life.

We believe those who are weak must be helped by the strong at all stages of his

We believe our elected officials must have the intelligence, integrity and determination to solve social problems without resorting to the informace solution of falling the helpless.

We are girl to give our time and efforts to work for these candidates who have pled-set their support of a Human Life Amendment

Rapid City Youth For Life-

If you share our concern and wish to join or help in any way, call: 342 a135.

WE LOVE LIFE!

Rapid C. A., S. D. 4 5770

### MAY, CHN'OL, DOYLE & BECKER P.C.

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

FIRST CLASS MAIL



dec 11129

#### MAY, JOHNSON, DOYLE & BECKER, P.C.

904132

COUNSELLORS AT LAW

412 WEST NINTH STREET

POB N 1443

SIOUX FALLS, SOUTH DAKOTA 57101

TELEPHONE 10051 330-2503

September 13, 1979

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

Attention: Carolyn Weeder

Re: MUR 960

Dear Ms. Weeder:

H ST MAN

GEORGE O JOHNSON

KEREST & MAKTIN

HAROLD C DOYLE

JAMES R RECKER DERALD W WIEHL

EDWARD LEARY GARLD JENGS

9

I wish to advise you that I have sent in the mail today to persons in Rapid City, South Dakota and White, South Dakota, Affidavits for execution by them detailing their knowledge concerning Exhibits "B" and "D" referred to in the above Complaint. I hope to have them back in my office the first of next week so that I can immediately forward them to you so that you will have them sometime next week as we discussed in our telephone conversation on Monday. September 10.

I was not able to prepare the Affidavits prior to today since one of the persons with knowledge was gone and I was not able to visit with them until later yesterday.

Immediately upon return of the executed Affidavits to me, I will immediately forward them to you so that you should have them sometime next week.

Thank you for your continued cooperation.

Yours very truly.

MAY. JOHNSON. DOYLE & BECKER. P.C.

James R. Becker

JRB: sw

May, Johnson, Doyle & Becker, P. C.

Counsellors At Law

412 West Ninth Street

P. O. Box 1443

Sioux Falls, SD 57101



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

Attention: Carolyn Weeder

MAY, JOHNSON, DOYLE & BECKER, PEDERAL ELECTION 10981 COUNSELLORS AT LAW COMMISSION R G MAY 412 WEST NINTH STREET GEORGE O JOHNSON TELEPHAINE HAROLD C DOYLE PORX 1443 79 AUG 27 AM 9:43 JAMES R BECKER SIOUX FALLS, SOUTH DAKOTA 57101 DERALD W WIEHL RICHARD MOE EDWARD J LEAHY GARY D JENSEN ARREST & MARIN August 22, 1979 Federal Election Commission 1325 K Street NW Washington DC 20463

ATTENTION: William C. Oldakor

General Counsel

RE: MUR 960-Life Amendment

Political Action Committee, South Dakota

Dear Mr. Oldaker:

C

This letter is to confirm my telephone conversation with Carolyn Weeder of your staff on August 20, 1979 in response to the questions raised in your letter of August 16, 1979.

We do not believe that the answers to any of the interrogatories are inconsistent with the two exhibits "B" and "D" for the reason that neither of those exhibits were sponsored, paid for, authorized or prepared with the prior knowledge or consent of LAPAC, S.D. Rather, we believe that the two exhibits were prepared, paid for and distributed by others who used the LAPAC name without permission. Accordingly, the answers to interrogatories 3, 4, 6 and 11 are correct.

In my telephone conversation with Ms. Weeder on August 20, I advised her that I would be away from my office between August 22 and September 4. However, I do want to submit additional documentation and evidence in support of the position of LAPAC, S.D. to the Federal Election Commission. Because of time pressures, I am unable to set forth in this letter, in any detail, the facts which support the general position stated above. However, I have telephoned the representative of LAPAC, S.D. and advised her to obtain for me from persons involved in, or having knowledge of, the distribution of Exhibits "B" and "D" the facts surrounding their publication and dissemination and payment therefor. Upon my return to

2 the office, I will follow up on this matter and submit a more detailed statement, together with whatever evidence is available, to the Commission for the purpose of clarifying and supplementing this general response. Very truly, MAY, JOHNSON, DOYLE & BECKER, P.C. James R. Becker JRB:mlr

- · May, Johnson, Doyle & Becker, P. C.

for the state of

Counsellors At Law

A12 West Ninth Street

P. O. Box 1443

N. Sioux Falls, SD 57101





Federal Election Commission 1325 K Street NW Washington DC 20463

ATTENTION: William C. Oldaker General Counsel



#### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM:

MARJORIE W. EMMONS/MARGARET CHANEY me

DATE:

SEPTEMBER 6, 1979

SUBJECT:

MUR 960 - Interim Investigative Report dated 9-4-79; Received

In OCS 9-5-79, 9:56

The above-named document was circulated to the Commission on a 24-hour no-objection basis at 4:00, September 5, 1979.

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

September 5, 1979

MEMORANDUM TO: Marge Ermons

FROM:

Elissa T. Garr

SUBJECT:

MUR 960

Please have the attached Interim Invest Report on MUR 960 distributed to the Commission.

Thank you.

COMMIS

# BEFORE THE FEDERAL ELECTION COMMISSION 5 September 4, 1979

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#### INTERIM INVESTIGATIVE REPORT

A draft General Counsel's Report has been prepared concerning this matter, and approval by the Team Supervisor is pending. The final General Counsel's Report will be ready for Commission consideration during the week of September 3, 1979.

C

William C. Oldaker General Counsel



COUNSELLORS AT LAW

412 WEST NINTH STREET

PU BOX 1443

TELEPHONE (605) 336-2563

SIOUX FALLS, SOUTH DAKOTA 57104

August 6, 1979

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

R G 44)

TRALD W. P. AK HARON EDWARD,

CRAM & O ADMAN MARKED C IXM MINTER BLIKE INLE FISHE

> Re: Life Amendment Political Action Committee, Inc. -South Dakota MUR 960

Dear Mr. Oldaker:

I represent Life Amendment Political Action Committee - South Dakota ("LAPAC SD") in connection with the above matter. As requested in your letter of July 2. 1979, addressed to our client, we enclose executed Answers to Interrogatories.

The activities of LAPAC-SD were limited solely to those in connection with elections for statewide offices in South Dakota. LAPAC-SD has not, at any time, participated, either directly or indirectly, in any elections or campaigns for federal office. Specifically, LAPAC-SD has not expended any funds, either directly or indirectly, in connection with the campaigns for Congress referred to in the letter of Ms. Gail M. Harmon to the FEC dated April 30, 1979.

We believe that this information, together with the Answers to Interrogatories enclosed will provide your office with sufficient information to determine that the charges of Ms. Harmon are totally unfounded and to close the file on this matter insofar as LAPAC-SD is concerned.

However, if further information is required, please advise the undersigned,

Our client, LAPAC-SD, hereby waives confidentiality and requests that the full proceedings in MUR 960, insofar as it relates to LAPAC-SD, be spread upon the public record. 2 U.S.C. § 457(g)(a)(3)(B).

Very truly yours.

MAY, JOHNSON, DOYLE, BECKER & FISHER, P.C.

James R. Becker

JRB: sw

Me. Carolyn Weeder

CU:

10852 MAY, JOHNSON, DOYLE, BECKER & FISHER, P.C. COUNSELLORS AT LAW E.C. MAN 412 WEST NINTH STREET GEOM IE (). JOHNSON PO BOX 1443 HARTLY DEWLE IAMES R. HECKLE SIOUX FALLS, SOUTH DAKOTA 57104 CALL F. LISHER DERALD W. WIEHL RICHARD MOF ELTRANDIT LEARLY August 6 , 1979 GARY D JENSEN Mr. William C. Oldaker General Counsel Federal Election Commission 1325 K Street N. W. Washington, D. C. 20463 Re: Life Amendment Political Action Committee, Inc. -South Dakota MUR 960 Dear Mr. Oldaker: I represent Life Amendment Political Action Committee - South Dakota ("LAPAC-SD") in connection with the above matter. As requested in your letter of July 2, 1979, addressed to our client, we enclose executed Answers to Interrogatories. The activities of LAPAC-SD were limited solely to those in connection with elections for statewide offices in South Dakota. LAPAC-SD has not, at any time, participated, either directly or indirectly, in any elections or campaigns for federal office. Specifically . LAPAC-SD has not expended any funds, either directly or indirectly, in connection with the campaigns for Congress referred to in the letter of Ms. Gail M. Harmon to the FEC dated April 30, 1979. We believe that this information, together with the Answers to Interrogatories enclosed will provide your office with sufficient information to determine that the charges of Ms. Harmon are totally unfounded and to close the file on this matter insofar as LAPAU-SD is concerned. However, if further information is required, please advise the undersigned. Our client, LAPAC-SD, hereby waives confidentiality and requests that the full proceedings in MUR 960, insofar as it relates to LAPAC-SD, be spread upon the public record. 2 U.S.C. § 457(g)(a)(3)(B). Very truly yours. MAY. JOHNSON, DOYLE, BECKER & FISHER, P.C. By James R. Becker JRB: SW Ms. Carolyn Weeder cer

#### BEFORE THE FEDERAL ELECTION COMMISSION

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, SOUTH DAKOTA

MUR 960

#### ANSWERS TO INTERROGATORIES

1. What is your committee's relationship to LAPAC, Inc.?

ANSWER: There is no relationship between Life Amendment Political Action Committee, South Dakota and LAPAC, Inc.

Did you pay any bills for, liquidate any debts for, or transfer any funds to LAPAC, Inc.? If so, please explain.

ANSWER: To my best knowledge, no bills were paid for, debts liquidated, or any funds transferred to LAPAC, Inc.

3. Did the federal candidates endorsed in your flyers and brochures in any way consent to, cooperate with, request, or suggest the use of their names or positions in these materials? If so, please explain.

ANSWER: No federal candidates were endorsed in flyers or brochures paid for by Life Amendment Political Action Committee, South Dakota, to my best knowledge.

4. Please itemize all expenses incurred in the preparation and distribution of every communication (ads, brochures, flyers, etc.) relating to a federal election. Please include and describe expenses incurred for design, layout, printing, postage, salaries, etc. of these communications.

> ANSWER: No expenses were incurred in the preparation and distribution of any communications relating to a federal election by Life Amendment Political Action Committee, South Dakota.

5. How did your committee obtain information about the candidates' views on pro-life issues and what costs were incurred in collecting this information?

ANSWER: Life Amendment Political Action Committee, South Dakota did not engage in any activities seeking to obtain information about federal candidates' views on pro-life issues and accordingly no costs were incurred by it in collecting any such information.

6. Please state exact amounts of expenditures and contributions, and any other monies relating to any federal activities. Please itemize and describe each of these expenditures and contributions in detail. ANSWER: None. 7. Is LAPAC, S.D. registered as a political committee in South Dakota? If so, please submit copies of any statements or reports filed with the state. ANSWER: Yes. Copies of Life Amendment Political Action Committee, South Dakota's filings with the South Dakota State Ethics Commission were attached to the letter dated April 30, 1979 from Gail M. Harmon to the Federal Election Commission which apparently was the basis for the above Complaint. No reports after that date have been filed with the South Dakota State Ethics Commission. 8. Is LAPAC, S. D. incorporated? If so, please submit copies of Articles of incorporation, By-Laws, etc. If not, please submit a list of Board members or officers of LAPAC, S. D. ANSWER: Life Amendment Political Action Committee. South Dakota is not incorporated. Its sole officer is Ellen Dempsey, Treasurer, C White, South Dakota. 9. Has your group ever received money from other pro-life groups? If so, please state the name and address of the group, the amount of money and the date of the transfer of money. ANSWER: All contributions received are listed on the reports filed with the South Dakota State Ethics Commission. 10. Has your group ever transferred money to other pro-life groups. If so, please state the name and address of the group, the amount of money and the date of the transfer of money. ANSWER: All expenditures by Life Amendment Political Action Committee, South Dakota, are set forth on the reports filed with the South Dakota State Ethics Commission. 11. Please submit a copy of every brochure printed and/or distributed by LAPAC. S. D. which mentions in any manner the name(s) of a candidate for federal office. ANSWER: No brochures were printed or distributed by Life Amendment Political Action Committee. South Dakota which mentioned in any manner the names of any candidates for federal office to the best of my knowledge. -2-

12. Has your group ever made a contribution to a candidate for federal office. If so, state the name of the candidate and the amount of the contribution.

ANSWER: No.

(SEAL)

	Ellen Vennes
	Ellen Dempsey
STATE OF SOUTH DAKOTA	
	: SS
COUNTY OF BROOKINGS	)
officer, personally appeare be the person whose name	day of <u>Occord</u> , 1979, before me, the undersigned ed Ellen Dempsey, known to me or satisfactorily proven to is subscribed to the within instrument and acknowledged for the purposes therein contained.
In witness where	eof I hereunto set my hand and official seal.
	Vieta Willmott
	Notary Public, South Dakota

-3-

#### MAY, JOHNSON, DOYLE, BECKER & FISHER, P.C.

COUNSELLORS AT LAW

412 WEST NINTH STREET

PO B. 6: 1445

SIOUX FALLS, SOUTH DAKOTA 57/24

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

#### MAY, JOHNSON, DOYLE, BECKER & FISHER, P.C.

LON INSELLORS AT LAW

412 WEST NINTH STREET

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



#### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 16, 1979

#### FEDERAL EXPRESS

Mr. James R. Becker Counselor at Law 412 West Ninth Street P.O. Box 1443 Sioux Falls, South Dakota 57104

> RE: MUR 960-Life Amendment Political Action Committee, South Dakota

Dear Mr. Becker:

The Commission has received Life Amendment Political Action Committee, South Dakota's response to MUR 960 Interrogatories.

The Commission fails to understand answers to Interrogatories 3, 4, 6 and 11 in light of the facts presented in the complaint, specifically Exhibits "B" and "D".

For example, Answer 3 states that "No federal candidates were endorsed in flyers or brochures paid for by Life Amendment Political Action Committee, South Dakota, ..."
Furthermore, Answer 4 reads that "No expenses were incurred in the proparation and distribution of any communications relating to a federal election..." by LAPAC, S.D.

Answer 6 indicates that LAPAC, S.D. made no expenditures and/or contributions in connection with federal activities. Answer 11 further states that "No brochures were printed or distributed by (LAPAC, S.D.) which mentioned in any manner the names of any candidates for federal office..."

With these aforementioned responses in mind, how does LAPAC, S.D. account for publications Exhibits "B" and "D" which clearly endorse federal candidates and which state that they were "paid for" and "sponsored by" LAPAC, S.D.? James R. Becker Page 2

The Commission gives you an opportunity to explain this discrepancy. In order to expedite this matter, please telephone your clarification to Carolyn Weeder, the staff member assigned to this matter at (202) 523-4039. The conversation can subsequently be confirmed by a written response.

We anticipate your immediate reply.

Sincerely,
William C. Oldaker

General Counsel

 The following service is requested to the Show to whom and date delivered. Show to whom, date, and address RESTRICTED DELIVERY Show to whom and date deliver RESTRICTED DELIVERY Show to whom, date, and address of g CONSULT POSTMASTER FOR PEES 3. ARTICLE DESCRIPTION REGISTERED NO | CERTIFIED (Always obtain signature of addressee or agent have received the article described above SIGNATURE : Addressee Authorized agent 6 UNABLE TO DELIVER BECAUS

# BARNETT, ALAGIA & CARENED

1627 K STREET, N.W. COMMISSION

WASHINGTON, D.C. 20006

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BARNETT & ALAGIA\*
KENTUCKY HOME LIFE BUILDING
BOX 1178
LOUISVILLE, KENTUCKY 40201
(ELEPHONE (502) 385-4131

BARNETT, ALAGIA & PROSPERI\*\*

149 ROTAL PALM WAT

PALM BEACH, FLORIDA 33480

1518 PHONE 13031 817-3699

August 6, 1979

BERNARD H. BARNET!
MARION EDWYN HARRISON
RICHARD M. TRAUTWEIN
JOHN T. MILLER\*
MICHAEL E. LANNON\*
RICHARD A. GI ADSTONE
PATRICIA G. ANDERSON
ANTHONY O. BROWN\*
DARRYL W. DURHAM\*
WM. CARL FUST\*
GARY D. GARRISON\*
JOHN M. HIMMELBERG
W. DAVID KISER\*
MARY CHERYL MATHEIS
IVAN RICH\*

903513

OF COUNSEL RUFUS E. WILSON

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

Re: Life Amendment Political Action Committee, Inc. MUR #960

Dear Mr. Oldaker:

D. PAUL ALAGIA, JR. WILLIAM A. CAREY ALLAN B. SOLOMON' M. BROOKS SENN'

A. PAUL PROSPERIT

ST. JOHN BARRETT

FRANKLIN DRAKE"

HONALD L. GAFFNEY.

JOHN S. KECK\* KARL F. LOUCKS III\* DONALD F. MINTMIRE

JACK E. RUCK\* JOHN F. SHERLOCK II.

LEE C. SUMMERS\*

CHARLES DAWSON BARNETT

Part of the Answer to Interrogatory \$6, photocopy enclosed, inadvertently is in error.

The Directors of LAPAC are Mr. Paul A. Brown, Dr. Mildred F. Jefferson and Robert L. Sassone, Esquire.

Both the Interrogatory and that portion of the answer are irrelevant to the issues in the case in any event.

Sincerely,

MARION EDWYN HARRISON

MEH:kg Enc

cc Ms. Carolyn Weeder

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#### BEFORE THE FEDERAL ELECTION COMMISSION

NATIONAL ABORTION RIGHTS ACTION LEAGUE ]

ν.

MUR #960

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

#### ANSWERS TO INTERROGATORIES

- la. What is your relationship with LAPAC, S.D.?
  - A. No relationship.
- 1b. Have you ever in any way provided administrative or financial assistance to LAPAC, S.D. or to any other local prolife committees?
  - A. No.
  - lc. Is LAPAC, S.D. a member of LAPAC, Inc.?
    - A. No.
- ld. If so, what does this mean in terms of benefits to LAPAC, S.D. or duties?
  - A. Not applicable.
- Did the federal candidates endorsed in your flyers and brochures in any way consent to, cooperate with,

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request, or suggest the use of their names? If so, please explain.

- A. No. Life Amendment Political Action

  Committee, Inc. ("LAPAC") issued only three flyers pertaining
  to South Dakota elections. Attachments 1, 2 and 3.
- 3. Explain how your committee liquidated the debt of \$669.10 to Harold's Printing Company in your 30-day post general election report and explain why this was not reported.
- A. LAPAC liquidated said debt by a payment of \$350.00 under date of January 4, 1979 and \$319.19 under date of March 22, 1979, photocopies of checks attached as Attachments 4 and 5.

LAPAC reported both payments. See LAPAC's First Quarter 1979 Report, filed April 10, 1979, pages 1 and 12.

- 4. Provide a copy of every communication sponsored and paid for by LAPAC, Inc., endorsing any federal candidate and the number of copies of each printed and distributed.
- A. As to South Dakota (the subject matter of MUR #960), see Interrogatory #2, supra. Of Attachment 1, 15,000 were printed. Of Attachment 2, approximately 100 were printed.

  Of Attachment 3, approximately 100 were printed.

As to states other than South Dakota (each beyond the scope of MUR #960), LAPAC paid to Lessing Flynn Ad Agency, Des Moines, Iowa, the sum of \$2,000.00 to defray in part the

80047 - 3 distribution by Pro-Life Action Council, Box 2035, Des Moines, Iowa 50310, of a brochure, Attachment 6. See LAPAC's November 7, 1978 10-day report, page 2. Itemize and describe in detail all expenses incurred in the preparation and distribution of every communication relating to any federal election, including costs for design, layout, printing, postage, salaries, etc. -A. See Interrogatory #3, supra. 6. Provide a copy of LAPAC, Inc.'s Articles of Incorporation/Bylaws and a list of its Board members. Articles of Incorporation and Bylaws attached as Attachments 7 and 8. Directors are Mr. Paul A. Brown, Mrs. Judith A. Brown, Mrs. Mary Hunt. LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC. District of Columbia City of Washington, ss: " Communication - 1984 Subscribed and sworn to before me a Notary Public this 1st day of August , 1979. Notary Public, D.C. My Commission expires April 14, 1984.

# BARNETT, ALAGIA & CAREY

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WASHINGTON, D.C. 20006

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

CCCT 10833 BARNETT, ALAGIA & CAREY OF VED 903501 EDERAL ELECTION 1627 K STREET, N.W. COMMISSION D PAUL ALAGIA, JR. WASHINGTON, D.C. 20006 BERNARD H. BARNETT WILLIAM A. CAREY MARION EDWYN HARRISON ALLAN B. SOLOMON" TELEPHONE (202) 785-5572 RICHARD M. TRAUTWEIN M. BROOKS SENN" JOHN T. MILLER\* CABLE ALL OFFICES AS A AUG 9 AM 8:58 JOSEPH M. DAY" MICHAEL E. LANNON' A. PAUL PROSPERITE RICHARD A. GLADSTONE ST. JOHN BARRETT PATRICIA C. ANDERSON ANTHONY O. BROWN\* CHARLES DAWSON BARNETT. BARNETT & ALAGIA\* FRANKLIN DRAKE. DARRYL W. DURHAM" HENTUCKY HOME LIFE BUILDING JOHN E. EVANS" WM. CARL FUST BOY 1179 RONALD L. GAFFNEY-WILLIAM S. GLADING GARY D. GARRISON" OUISVILLE, KENTUCKY 40201 JOHN M. HIMMELBERG \*ELEPHONE (507) 585-4131 JOHN S. KECK-KARL F. LOUCKS H. W. DAVID KISER MARY CHERYL MATHEIS DONALD F. MINTMIRE IVAN RICH\* JACK E. RUCK\* JOHN F. SHERLOCK II. BARNETT, ALAGIA & PROSPERI\*\* 248 ROTAL PALM WAY LEE C SUMMERS\* FALM BEACH, FLORIDA 33480 OF COUNSEL MARY JO WINKLER" TELEPHONE 1305: 832-5698 RUFUS E. WILSON August 6, 1979 William C. Oldaker, Esquire General Counsel Federal Election Commission 1325 K Street, N.W. Washington, D. C. 20463 Re: Life Amendment Political Action Committee, Inc. MUR #960 Dear Mr. Oldaker: Part of the Answer to Interrogatory #6, photocopy enclosed, inadvertently is in error. The Directors of LAPAC are Mr. Paul A. Brown, Dr. Mildred F. Jefferson and Robert L. Sassone, Esquire. Both the Interrogatory and that portion of the answer are irrelevant to the issues in the case in any event. Sincerely, MARION EDWYN HARRISON MEH:kg Enc cc Ms. Carolyn Weeder

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#### BEFORE THE FEDERAL ELECTION COMMISSION

NATIONAL ABORTION RIGHTS ACTION LEAGUE ]

v .

MUR #960

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

#### ANSWERS TO INTERROGATORIES

- la. What is your relationship with LAPAC, S.D.?
  - A. No relationship.
- 1b. Have you ever in any way provided administrative or financial assistance to LAPAC, S.D. or to any other local prolife committees?
  - A. No.
  - lc. Is LAPAC, S.D. a member of LAPAC, Inc.?
    - A. No.
- ld. If so, what does this mean in terms of benefits to LAPAC, S.D. or duties?
  - A. Not applicable.
- Did the federal candidates endorsed in your flyers and brochures in any way consent to, cooperate with,

... . o o o d o 🕨 - 2 request, or suggest the use of their names? If so, please to South Dakota elections. Attachments 1, 2 and 3.

No. Life Amendment Political Action Committee, Inc. ("LAPAC") issued only three flyers pertaining

explain.

- Explain how your committee liquidated the debt 3. of \$669.10 to Harold's Frinting Company in your 30-day post general election report and explain why this was not reported.
- A. LAPAC liquidated said debt by a payment of \$350.00 under date of January 4, 1979 and \$319.19 under date of March 22, 1979, photocopies of checks attached as Attachments 4 and 5.

LAPAC reported both payments. See LAPAC's First Quarter 1979 Report, filed April 10, 1979, pages 1 and 12.

- Provide a copy of every communication sponsored and paid for by LAPAC, Inc., endorsing any federal candidate and the number of copies of each printed and distributed.
- A. As to South Dakota (the subject matter of MUR #960), see Interrogatory #2, supra. Of Attachment 1, 15,000 were printed. Of Attachment 2, approximately 100 were printed. Of Attachment 3, approximately 100 were printed.

As to states other than South Dakota (each beyond the scope of MUR #960), LAPAC paid to Lessing Flynn Ad Agency, Des Moines, Iowa, the sum of \$2,000.00 to defray in part the

0004014 - 3 distribution by Pro-Life Action Council, Box 2035, Des Moines, Iowa 50310, of a brochure, Attachment 6. See LAPAC's November 7, 1978 10-day report, page 2. Itemize and describe in detail all expenses incurred in the preparation and distribution of every communication relating to any federal election, including costs for design, layout, printing, postage, salaries, etc. A. See Interrogatory #3, supra. 6. Provide a copy of LAPAC, Inc.'s Articles of Incorporation/Bylaws and a list of its Board members. Articles of Incorporation and Bylaws attached as Attachments 7 and 8. Directors are Mr. Paul A. Brown, Mrs. Judith A. Brown, Mrs. Mary Hunt. LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC. District of Columbia City of Washington, ss: (4) Communication 1984 Subscribed and sworn to before me a Notary Public this 1st day of august, 1979. PAMELA L. VENNERDRO Notary Public, D.C. My Commission expires April 14, 1984.

. LAW OFFICES

BARNETT- HAGIAN CARE

WASHINGTON, D.C-20006

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

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## MAY, JOHNSON, DOYLE & BECKER HODON COUNSELLORS AT LAW COMMISSION

412 WEST NINTH STREET

10 BOX 179 AUG 6 AM 10: 34

TELEPHONE 1605) 336-2565

SIOUX FALLS, SOUTH DAKOTA 57101

August 2, 1979

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

RE: MUR 960

R. G. MAY GEORGE O. JOHNSON

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HAROLD C. DOYLE

DERALD W WIEHL RICHARD MOE EDWARD J LEAHY GARY D JENSEN

MINERI A MARTIN

Dear Mr. Oldaker:

On August 1, 1979 we received your letter of July 25, 1979 granting our request for an extension of time in which to file Answers to Interrogatories in the above matter. On July 31, the undersigned called Carolyn Weeder of your office advising that the written Answers would not be filed with your office by the end of July and requesting a short additional extension of time.

We are aware of the obligation imposed upon the FEC to expeditiously conduct its investigation. However, we would ask that you bear in mind that your initial letter was received by Mrs. Ellen Dempsey on behalf of LAPAC, S.D. who then had to mail the Interrogatories to me since she does not regularly have the opportunity to come to Sioux Falls. After I received the Interrogatories I then had to review them and get back in touch with her to ascertain the necessary facts to formulate proper Answers. Since everything had to be done by the mail or telephone, a substantially greater amount of time elapsed than you might normally consider reasonable. Furthermore, I was away from my office a good deal during the month of July because of an injury.

However, as I advised Ms. Weeder in my telephone conversation with her, the Answers to the Interrogatories had already been formulated and sent to my client for review and signature. Upon her receipt of the Answers, she will be required to take them to a Notary Public in a community approximately twenty miles from her home to have her signature acknowledged and then return them to me through the mail. As I also advised Ms. Weeder,

Mr. Oldaker -2-August 2, 1979 I will be out of my office between August 2-8 but I have instructed my secretary to immediately forward to you the executed Answers to the Interrogatories as soon as they have been returned to us. Accordingly, we would respectfully request that the Commission hold its file open on this matter pending receipt by it of the Answers which should be forthcoming within the next week at the latest. Your cooperation in this matter will be greatly appreciated. Very truly, MAY, JOHNSON, DOYLE & BECKER, P.C. JRB:sko

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MAY JOHNSON, DOYLE & BECKER, P.C.

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

10760) **BARNETT, ALAGIA & CAREY** 1627 K STREET, N.W.

WASHINGTON, D.C. 20006

TELEPHONE (202) 785-5572 CABLE ALL OFFICES ALBAR

> BARNETT & ALAGIA\* KENTUCKY HOME LIFE BUILDING BOX 1179 LOUISVILLE, KENTUCKY 40201 TELEPHONE (502) 585-4131

BARNETT, ALAGIA & PROSPERI\*\* 749 ROYAL PALM WAY PALM BEACH, FLORIDA 33480 TELEPHONE (305) 832-5696

August 1, 1979

BERNARD H. BARNETT MARION EDWYN HARRISON RICHARD M. TRAUTWEIN JOHN T. MILLER MICHAEL E. LANNON' RICHARD A. GLADSTONE PATRICIA C. ANDERSON ANTHONY O. BROWN DARRYL W. DURHAM\* WM. CARL FUST GARY D. GARRISON' JOHN M. HIMMELBERG W. DAVID KISER MARY CHERYL MATHEIS IVAN RICH\*

OF COUNSEL RUFUS E. WILSON

#### BYHAND

D. PAUL ALAGIA. JR.

ALLAN B. SOLOMON\*

A. PAUL PROSPERIT

ST. JOHN BARRETT CHARLES DAWSON BARNETT\*

FRANKLIN DRAKE.

RONALD L. GAFFNEY

WILLIAM S. GLADING

KARL F. LOUCKS II\*\*

DONALD F. MINTMIRE

JOHN E. EVANS"

JOHN S. KECK\*

JACK E RUCK' JOHN F. SHERLOCK II.

LEE C. SUMMERS MARY JO WINKLER"

WILLIAM A. CAREY

M. BROOKS SENN\*

JOSEPH M. DAY"

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

Re: Life Amendment Political Action Committee, Inc. MUR #960

Dear Mr. Oldaker:

In response to your letter of July 2, 1979 addressed to our client Life Amendment Political Action Committee, Inc. ("LAPAC"), MUR #960, we attach executed Answers to Interrogatories and comment as follows.

- LAPAC is not in violation of the provisions of 2 USC §434 inasmuch as LAPAC reported the liquidation of the debt to which the Interrogatories make reference. See Interrogatory #3 and Answer.
- LAPAC is not in violation of the provisions of 2 USC \$433 for failing to include LAPAC, S.D. and/or other prolife committees as affiliated organizations inasmuch as no such organization is affiliated. See Interrogatory #1 and Answer. Further, there is some question as to whether LAPAC, S.D. exists.

#### BARNETT, ALAGIA & CAREY

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William C. Oldaker, Esquire August 1, 1979 Page two

3. LAPAC is not in violation of the provisions of 2 USC §441d with respect to Attachments 1, 2 and 3 to the Interrogatories, q.v. §441d refers to communications "... through any broadcasting station, newspaper, magazine, outdoor advertising facility, direct mailing, or any other type of general public political advertising ... The regulation repeats the statutory language adding, by way of example as to limitation, exclusions as to "bumper strips, a pin, button, pen and similar small items upon which the disclaimer cannot be conveniently printed ... " 11 CFR §110.11(a)(1). Thus, neither the statute nor the regulation includes a handbill, which obviously is not "general public political advertising" but rather a form of personal communication.

As a lawyer I find the purpose of the Federal Election Commission ("FEC") in drafting §110.11(a)(1) as it did to be obvious - namely, to exclude "bumper strips, a pin, button, pen and similar small items upon which the disclaimer cannot be conveniently printed . . ." [Italics supplied.] Hence, if asked, I would have advised a client to include the applicable portion of the message set forth in 11 CFR §110.11(a)(i)(ii), not because §441d(2) necessarily requires it but because FEC intends it. However, because the handbills are not "general public political advertising" our client should not be held to a violation, however minimal and technical the violation otherwise might be.

The charges in MUR #960, all trivial whether or not accurate, emanate from a letter of April 30, 1979 to FEC from Ms. Gail M. Harmon, filing on behalf of her client the National Abortion Rights Action League ("NARAL"). NARAL is conducting a nationwide campaign of harassment and vilification of prolife groups. We have reason to believe NARAL has filed complaints with the FEC against seven or so other prolife organizations. In evaluating the charges at issue, the FEC should bear in mind this motivation. For example, on April 18, 1979 NARAL issued a press release, Attachment A, in which NARAL announced "allegations of major illegal actions by two national anti-abortion groups and four state anti-abortion groups . . ." The press release further announced a press conference on Capitol Hill for

#### BARNETT, ALAGIA & CAREY

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William C. Oldaker, Esquire August 1, 1979 Page three

10:00 AM on April 30. In addition, on April 12 NARAL issued another press release, to be held for release until April 30 at 10:30 AM, charging LAPAC and other prolife groups with "major" and "flagrant . . ." unlawful acts. Attachment B. It ill behooves FEC to waste its resources and those of lawful political action committees in facilitating NARAL's campaign of harassment.

Our client waives confidentiality and requests that the full proceedings in MUR #960 be spread upon the public record. 2 USC §437g(a)(3)(B).

Sincerely,

MARION EDWYN HARRISON

MEH:kg Enc cc Ms. Carolyn Weeder



## NATIONAL ABORTION RIGHTS ACTION LEAGUE 825 15th Street, NW, Washington D. C. 20005

News Release

ATTACHMENT A

#### FOR IMMEDIATE RELEASE

For more information, contact:

Janet Beels, Director of Public Information
(202) 347-7774 OR

Joan Eisenstedt, Conference Coordinater
347-7774 through April 27

April 27-30: 234-0700, NARAL/Shoreham Americana

ABORTION RIGHTS CONVENTION FOCUSES ON ELECTORAL POLITICS

Washington, D.C., April 18, 1979 ---- Abortion rights supporters from all 50 states will converge on Washington this month to attend the National Abortion Rights Action League's annual convention. The League, the nation's largest single-issue group working to defend abortion rights, will celebrate its 10th year of existence at the April 28-30 annual meeting, to be held at the Shoreham-Americana Chotel.

The convention's focus on the combination of electoral politics with grass
Oroots organizing parallels a recent change in strategy for the pro-choice group.

"This year," said Karen Mulhauser, NARAL Executive Director, "marks the beginning of an aggressive campaign -- we call it "Impact '80" -- to let legislators know that compulsory pregnancy is not the will of the people. We are arming our acti
Cvists now to support those who vote for choice. We know that the majority of Americans believe that abortion should remain a woman's personal decision and our goal is to organize that majority."

In workshops and other information sessions, participants will hear the history of the issue and learn to mobilize to insure its future.

A list of speakers follows:

Midge Costanza and Michael McCloud will lead the plenary on electora: politics (9-10:15 a.m., Sunday). Costanza, former Special Assistant to the President, will speak on the importance of grassroots involvement in electoral politics. McCloud,

right-hand man to John Anderson, will speak from his involvment in Anderson's successful campaign against a single-issue anti-abortion candidate in 1978.

Anderson will be meeting the abortion issue head-on again in his bid for the Republican presidential nomination.

Immediately following will be "how-to" workshops on electoral politics, led by six political consultants, including Matt Reese, specialist on campaigns for single-issue coalitions.

Highlights of Saturday's program include comments by well-known constitutional lawyer and abortion rights specialist <u>Harrict Pilpel</u>, the General Counsel
to Planned Parenthood Federation of America. She will speak of the recent history
of the abortion rights struggle -- how the fight was won through litigation and
legislation. (Saturday plenary, 10-11 a.m.) Also speaking will be <u>Rebecca Cook</u>,
who has been consulting at cabinet and parliamentary levels on national family
planning law and policy for the past six years with the International Planned
Parenthood Federation. She will discuss the increasing liberalization of abortion
laws in other countries in the past dozen years, and its connection with other
civil rights for women abroad. (Also Saturday plenary session)

Saturday brunch will include an address from <u>Jeannie I. Rosoff</u>, President of the Alan Guttmacher Institute. Rosoff will share her perspective as a long-time member of the Capitol Hill scene, recalling the days when even contraception was a practically forbidden topic.

Sesson I workshops (2:45-3:45 p.m., Saturday) include Minors' Rights by Bill Baird, who has been challenging restrictive birth control and abortion laws for 15 years, and is the plaintiff in Bellotti v. Baird, now before the Supreme Court, a case which will dramatically affect the rights of teenagers to abortions.

Session I will also mark the beginnings of the first national group for doctors organizing to defend a woman's right to abortion. The <u>Physicians for Choice</u> workshop will be directed by <u>Dr. Christopher Tietze</u>, one of the world's most eminent authorities on human fertility and its control. Dr. Tietze is now a Senior Consultant to

the Center for Policy Studies of the Population Council whose he is primarily concerned with research in the demographic and public health aspects of induced abortion. Dr. Tietze, with <u>Dr. Jack Lippes</u>, inventor of the "Lippes Loop" IUD, will discuss how to organize physicians to become actively involved in abortion rights.

Naomi Baden, Executive Director of the Coalition of Labor Union Women and a staff member of the Amalgamated Clothing and Textile Workers Union, will lead Working with Union People, also in Session I. She will speak to the possibilities and problems of cooperation between abortion rights groups and labor unions.

Pat Gavett, Executive Director of the Religious Coalition for Abortion Rights, will preside over a workshop on Working with the Religious Community in Session II (4:15-6 p.m., Saturday). The Religious Coalition was responsible earlier this year for the recommitment of 18 of its member denominations and religious organizations to make abortion rights one of the major social action issues on which they work.

Well-known organizing expert and Director of the Midwest Academy, <u>Heather Booth</u>, will lead a <u>community organizing</u> workshop. <u>Uta Landy</u>, Executive Director of the National Abortion Federation, the professional association of abortion providers, and who established the first national toll-free consumer hotline on abortion, will lead the <u>Clinic Organizing</u> workshop.

Dr. Helen Rodriques-Trias, Chief of Pediatrics at Roosevelt Hospital in New York, will join other minority leaders in chairing the <u>Working with Minorities</u> workshop. She is a founder of the Committee to End Sterilization Abuse, and works to protect Puerto Rican women against coerced sterilization.

Honday, April 30 (8:30 a.m.) ected so far are George Mil (D-CA), Michael Barnes (D-MD), Ted Weiss (D-NY), Tony Beilenson (D-CA), Vic Fazio (D-CA), and others.

Immediately following, a press conference will announce NARAL's allegations of major illegal actions by two national anti-abortion groups and four state anti-abortion groups. The conference will be held on Capitol Hill (exact location to be announced), at 10:00 a.m. Karen Mulhauser, NARAL Executive Director, will speak, and NARAL's autorney and others will be available as resource people. NARAL will be filing complaints against all six groups that morning with the Federal Election Commission. Another complaint against an Iowa anti-abortion group, the Pro-Life Action Council, was filed with the FEC by NARAL last year. It is still under in-

Convention-goers and many others will spend the rest of the day lobbying their Congresspeople on the issue of abortion rights.

- 30 -

\_See attached schedule for more details.

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News Release

NATIONAL ABORTION RIGHTS ACTION SEAGUE EN ED

HOLD FOR RELEASE UNTIL

For more information, contact: Janet Beals, Director of Public Informed (202) 347-7774 JUL 1 11979 - APRIL 30, 1979, 10:30 AM

## SIX ANTI-ABORTANT CHARGED WITH ELECTION LAW VIOLATIONS

Washington, D.C. 5/30/79 -- Complaints alleging violations of federal election laws by two national and four state anti-abortion groups were filed today with the Federal Election Commission.

The complaints were filed by the National Abortion Rights Action League against two national anti-abortion organizations, the Life Amendment Political Action Committee (LAPAC), and the National Right to Life Committee (NRLC). Complaints were also filed against state anti-abortion groups in South Dakota, Massachusetts, Indiana and New Mexico.

"We are appalled at the major violations of federal election laws that we have found in our limited search. We are asking the Federal Election Commission to investigate the extent of this lawbreaking, and take appropriate action," said Executive Director Karen Mulhauser.

"Both national groups flagrantly violated election laws in 1978, and continue to do so. At move been saying since last November that their claims to political strongth lask credibility. Their illegal actions make them even less credible."

NARAL is charging that the Life Amendment Political Action Committee is illegally soliciting funds from the general public through advertising, direct mail requests and ticket sales. NARAL alleges that the Life Amendment Political Action Committee is connected with the National Right to Life Committee, and federal election law clearly states that an affiliated organization may only solicit contributions from its parent organization's membership . . . not from the general public.

NARAL has requested the Federal Election Commission to order that such illegal activity be discentified and to instruct LAPAC to return these illegally solicited funds to the denots. NARAL's second complaint, against the National Right to Life Committee, alleges that NRLC's Voter Identification Project (which seeks to identify anti-abortion voters and mobilize them in support of anti-abortion candidates) constitutes unlawful corporate contributions to anti-abortion candidates. NARAL is requesting that the FEC prohibit NRLC's Voter Identification Project.

NARAL is also drawing to the FEC's attention unreported and illegal election activity in South Dakota, Massachusetts, Indiana and New Mexico.

Penalties for these violations of federal election law by two national and four state anti-abortion groups could total in excess of a hundred thousand dollars. If the violations are found to be knowing and willful, penalties could be double that amount.

NARAL's complaint to the Federal Election Commission alleging illegal activities by the Iowa Pro Life Action Council in the 1978 election is still under investigation.



NATIONAL ABORTION RIGHTS ACTION LEAGUE -825 15th Street, NV, Washington D. C. 20005 (202) 347-7774

Complaints against two national and four state anti-abortion organizations for past and present violations of federal election law are being filed with the Federal Election Commission by the National Abortion Rights Action League. A summary follows:

#### NATIONAL

o The Life Amendment Political Action Committee (LAPAC), a national antiabortion PAC, is illegally soliciting contributions from the general public, The close working relationship and overlap of personnel between the boards of Directors, officers, and staff of LAPAC and the National Right to Life Committee prove that the two organizations are connected. According to federal election law, a political action committee connected with a membership organization may only solicit contributions from the membership pool of the connected organization.

KARAL requests that the FEC stop the anti-abortion PAC from raising money from the general public, and return the monies illegally collected.

• The Voter Identification Project of the National Right to Life Committee, a national anti-abortion organization, is illegally contributing to the campaigns of political candidates in lows, Indiana, and other key states. The project seeks to identify anti-abortion voters in every state and mobilize them in support of anti-abortion candidates. Such activities by a corporation for the benefit of a candidate are considered in-kind contributions and are unlawful under federal election law.

NARAL is asking the FEC to spop NRLTC from pursuing this illegal activity, and to prohibit them from transferring any of this information to a political action committee unless at a fair market value. NARAL further requests that the FEC investigate how extensive and in how many states this illegal activity has been undertaken.

#### STATES

• A large amount of unreported election activity was conducted by one of two anti-abortion groups in South Dakota. Over \$1500 was spent to buy newspaper ads and print brochures endorsing federal candidates. This violated federal election laws by exceeding the \$1000 spending limit for unregistered contributors. The campaign materials carried the authorization of the Life Amendment Political Action Cormittee (neadquartered in Washington, D.C.), which did not report the expenditures. Either the Washington group should admit and report the expenditures, or LAPAC-South Dakota, the state group, operated illegally by not registering or filing reports with the Federal Election Commission.

o A Massachusetts inti portion group, Massachuse it izens for Life, acted illegally by distributing a brochure to the general public endorsing federal candidates. This constitutes an unlawful corporate contribution to a campaign.

Because the Massachusetts group is an affiliate of the National Right to Life Committee, and because NRLEC's past president, Dr. Mildred Jefferson, is connected with the local group, NARAL suspects that The violation was knowing and willful.

o A great deal of anti-abortion political activity, including printing and distribution of brochures and placement of full-page ads in newspapers, took place in Indiana's 8th Congressional District, and was not reported to the Federal Election Commission. The activity was done in the name of the Right to Life Chapter of the 8th Congressional District, but was not reported by that group. Neither was it reported by the registered political action committee of Indiana Right to Life, with which the district group is affiliated. This is in violation of federal election law requiring reporting of any campaign contributions of corporations and political action committees.

In addition, a large number of purportedly personal letters (signed by a local priest and other anti-abortion leaders) endorsing a candidate were tailed in the district without naming the political group that authorized them, in clear violation of federal election law. Postage for some of these letters was paid by a political campaign, one indication that the letters were not simply personal.

e An anti-abortion group incorporated in New Mexico, The Right to Life Committee of New Mexico, violated election laws by printing and distributing large numbers of newsletters endersing state and federal candidate. This constitutes an unlawful corporate contribution to a political campaign.

MARML found this illegal activity in the four states it investigated.

KARAL is asking that the FEC investigate for similar activity in these and other states. Because the pattern is similar, the possibility is great that unlawful activity is more extensive.than we discovered intthe initial research.

The Federal Election Commission, if it finds violations, may enforce . penalties up to the amount of the violation, which would total in excess of a' hundred thousand dollars in these instances. If the violations are considered knowing and willful, penalties can reach double the amount of the violation.

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#### BEFCRE THE FEDERAL ELECTION COMMISSION

NATIONAL ABORTION RIGHTS ACTION LEAGUE ]

V. | MUR #960
LIFE AMENDMENT POLITICAL ACTION |

COMMITTEE, INC.

#### ANSWERS TO INTERROGATORIES

- la. What is your relationship with LAPAC, S.D.?
  - A. No relationship.
- 1b. Have you ever in any way provided administrative or financial assistance to LAPAC, S.D. or to any other local prolife committees?
  - A. No.
  - 1c. Is LAPAC, S.D. a member of LAPAC, Inc.?
    - A. No.
- ld. If so, what does this mean in terms of benefits
  to LAPAC, S.D. or duties?
  - A. Not applicable.
- Did the federal candidates endorsed in your flyers and brochures in any way consent to, cooperate with,

request, or suggest the use of their names? If so, please explain.

A. No. Life Amendment Political Action
Committee, Inc. ("LAPAC") issued only three flyers pertaining to South Dakota elections. Attachments 1, 2 and 3.

3. Explain how your committee liquidated the debt

- 3. Explain how your committee liquidated the debt of \$669.10 to Harold's Printing Company in your 30-day post general election report and explain why this was not reported.
- A. LAPAC liquidated said debt by a payment of \$350.00 under date of January 4, 1979 and \$319.19 under date of March 22, 1979, photocopies of checks attached as Attachments 4 and 5.

LAPAC reported both payments. See LAPAC's First Quarter 1979 Report, filed April 10, 1979, pages 1 and 12.

- 4. Provide a copy of every communication sponsored and paid for by LAPAC, Inc., endorsing any federal candidate and the number of copies of each printed and distributed.
- A. As to South Dakota (the subject matter of MUR #960), see Interrogatory #2, supra. Of Attachment 1, 15,000 were printed. Of Attachment 2, approximately 100 were printed.

  Of Attachment 3, approximately 100 were printed.

As to states other than South Dakota (each beyond the scope of MUR #960), LAPAC paid to Lessing Flynn Ad Agency, Des Moines, Iowa, the sum of \$2,000.00 to defray in part the

00111 1811 - 3 distribution by Pro-Life Action Council, Box 2035, Des Moines, Iowa 50310, of a brochure, Attachment 6. See LAPAC's November 7, 1978 10-day report, page 2. Itemize and describe in detail all expenses incurred in the preparation and distribution of every communication relating to any federal election, including costs for design, layout, printing, postage, salaries, etc. A. See Interrogatory #3, supra. Provide a copy of LAPAC, Inc.'s Articles of Incorporation/Bylaws and a list of its Board members. A. Articles of Incorporation and Bylaws attached as Attachments 7 and 8. Directors are Mr. Paul A. Brown, Mrs. Judith A. Brown, Mrs. Mary Hunt. LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC. District of Columbia City of Washington, 3s: My Communication, 1984 Subscribed and sworn to before me a Notary Public this 1st day of Cinquet, 1979. Notary Public, D.C. My Commission expires April 14, 1984.

# LAPAC

(Lite Amendment Political Action Committee, Inc.)

Endorses and urges your support of the following Pro-Life candidates to the House and Senate of the United States on November 7, 1978:

LARRY PRESSLER has an excellent voting record in the U.S. House on all pro-life tax issues and has co-sponsored a Human Life Amendment.

LEO THORSNESS will sponsor and promote a Human Life Amendment.

JAMES ABDNCR has one of the best voting records for life in the U.S. House.

#### Vote FOR Life November 7

Sean Morton Downey, Jr., Chairman LAPAC, Inc. Ellen Dempsey, State Goordinator LAPAC, Inc.

## THIS LITTLE GUY WANTS YOU TO VOTE



FOR HIS LIFE NOVEMBER 7

# There is a Difference!



"When elected to Congress
9 would be honored to cosponsor and promote a
Human Life Amendment."

Leo Thorsness is strongly opposed to our tax dollars being used for abortions. DASCHLE

"...9 can't support a Human Life Amendment."

Daschel would use your tax dollars to abort babies.

## VOTE PRO-LIFE TUESDAY, NOV. 7, 1978

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.
Benjamin Franklin Station • P.O. Box 14263 • Washington, D.C. 20044

A Copy of the region of the fewer election Commission and is available for purchase from the feature Europia Commission, Washington, D.C.

## Vote for the unborn —

# Thorsness

**NOVEMBER 7, 1978** 

"If I am elected to Congress this November I would gladly sponsor a constitutional amendment allowing abortion only to prevent the death of the mother."





#### LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

Benjamin Franklin Station . P.O. Box 14263 . Washington, D.C. 20044

A copy of our report is filed with the Federal Election Commission and in a revalue for processor from the Election Commission, Washington, D.C.

P.S. There's a difference in the two candidates for First District Congressman.

LIFE AMENDMENT POLITICAL ACTION COMMITTEE INC. ENDORSES AND URGES YOUR SUPPORT OF THE FOLLOWING PRO-LIFE CANDIDATES TO THE HOUSE AND SENATE OF THE UNITED STATES ON NOVEMBER 7, 1978.

SOUTH DAKOTA SENATE: LARRY PRESSLER IS BY FAR THE BEST PERSON TO SEND TO THE SENATE.

SOUTH DAKOTA 1ST CONGRESSIONAL DISTRICT: LEO THORSNESS SUPPORTS
THE HUMAN LIFE AMENDMENT AND WILL BE A LEADER IN OUR FIGHT TO
RESTORE RESPECT FOR THE UNBORN.

SOUTH DAKOTA 2ND CONGRESSIONAL DISTRICT: REPRESENTATIVE JAMES ABDNOR HAS ONE OF THE BEST PRO-LIFE VOTING RECORDS IN THE HOUSE AND DESERVES YOUR FULL SUPPORT FOR RE-ELECTION.

PLEASE BACK ALL THREE OF THESE MEN THIS NOVEMBER 7TH. VOLUNTEER YOUR TIME NOW AND GIVE MILLIONS OF UNBORN CHILDREN THE CHANCE TO SEE WHAT WE TAKE FOR GRANTED....THE LIGHT OF GOD'S BEAUTIFUL DAY.

SEAN MORTON DOWNEY JR. CHAIRMAN: LAPAC INC.

8

ELLEN DEMPSEY
STATE COORDINATOR: LAPAC INC.

## NOVEMBER 7, 1978 — VOTE PRO-LIFE

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

Benjamin Franklin Station • P.O. Box 14263 • Washington, D.C. 20044

CORRECT ENDORSEMENT IS RECEIPT

JAN 11'79 00202

CHECK IS IN PAYMENT OF FOLLOWING ITEMS

DATE AMOUNT

P. O. BOX 14263

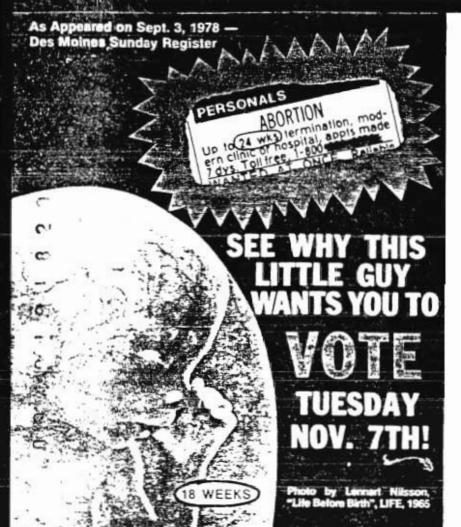
BEN FRANKLIN STATION

WASHINGTON. D. C. 20044

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Pro-Life Action Council P.O. Box 2035 Des Moines, Iowa 50310 BULK RATE U.S. POSTAGE PAID Permit No. 1343 Des Moines, Iowa

ATTACHMENT 6

## Vote for the Unborn on Nov. 7th!

In America today, the most helpless member of the human family—the unborn child—has been denied the protection of the law! Sad but true, even some endangered species of animals enjoy more legal protection than the unborn child

You have an unalienable right to life. And that right was legally protected for you from the day you were conceived. Today, because of a single Supreme Court decision, the same right to life you have always possessed has been taken away from the unborn child. If the unborn can be "terminated" today just because they are unplanned, unwanted or inconvenient, who might be eliminated for similar reasons tomorrow — the aged, the sickly, the mentally retarded, the physically handicapped? In the end,

just how safe will YOUR right to life be?

The unborn cannot speak for themselves but you can speak for them — with your vote on Tuesday. November 7th! We must elect men and women who will work for passage of a Human Life Amendment (H.L.A.) to the Constitution. This amendment will guarantee legal protection for ALL human life, regardless of age, health, capability or state of dependency.

If you feel, like our forefathers did, that the right to life is the foundation of all human rights, then read below how the various candidates stand on key pro-life issues — and VOTE on November 7th!



Roger JEPSEN

#### **UNITED STATES SENATE**

#### **HUMAN LIFE AMENDMENT (H.L.A.)**



YES

Jepsen will apprison and support a Human Life Amendment to restore legal protection for the unborn child NO



Clark is opposed to any meaningful Human Life Amendment to restore the right to life to the unborn of 3



Dick CLARK

#### USE OF TAX DOLLARS TO PAY FOR GOVERNMENT-SUBSIDIZED ABORTIONS



NO

Jepsen is opposed to using your tax donars in any way to pay for abortion services Clark has consistently supported using your tax portars to pay for abortions





#### FORCING EMPLOYERS TO PROVIDE ABORTION BENEFITS.



NO

Jepser supports a "conscience clause" permitting private employers to exclude abortions from pregnancy disability benefits.

ENDORSED BY . . .

Pro-Life Action Gouncil of Jowa Life Amendment Political Action Committee National Pro-Life Political Action Committee Clark has voted to force private employers to include aportions in their pregnancy disability benefits.





SUPPORTED BY ....

National Addition Rights Add to Leaple with #75% radical and militant pro-abortion groups in America.

#### U.S. HOUSE (1st District)

#### James LEACH

Occoses human unter Amenament i icroses put-clunding of appropria

#### Richard MEYERS

Opposes Human Life Amendment supports publicituding of aportions

#### U.S. HOUSE (4th District)

#### Neal SMITH

unclear on milit — wants to need for some but not at futioning restrictions on more approxima-

#### Charles MINOR

Occasional and a 19 Afficiament successful of language of appropria

#### GOVERNOR

#### Jerry FITZGERALD

Occases any meaningful muman who Amendment occases bub is funding for abund is

### Robert

Opposes Human Life Amenoment supports public funding for appropria

#### LT. GOVERNOR

#### Terry BRANSTAD

Supports Human Life Amendment opposes public funding for sportions

## William

5uccons numer Life Amenoment coposes subjectioning for approve.

The Proude Action Daunch is registered with the lower Campaign Enance Daptieurs. Commission and the Federal Section Commission Riccological policy short the Federal Section Commission and easiest story to provide the Federal Section Commission Washington Dic.

#### Since The Supreme Court Legalized Abortions in 1973 . . .

- ... over 6,000,000 abortions have been performed in the United States in the past five years.
- ... over \$256,000,000 in tax dollars have been spent to directly pay for 1,400,000 governmentsubsidized abortions.
- ... parents have been stripped of their rights to be consulted or even notified before their minor daughters undergo abortions.

# Now Ask Yourself If This Issue Is Important Enough To Base Your Vote On?

Your vote on Tuesday. November 7th is CRUCIAL! Several important races can be decided by a margin as narrow as 1 or 2 votes per precinct. If you vote and urge your pro-life friends and relatives to vote, the election of qualified pro-life candidates will be assured! Be sure to VOTE ... and PLEASE help us in our fight to stop the legalized killing of human life —

C

MAIL THIS COUPON TODAY!-

- fathers have been stripped of their rights to protect the lives of their unborn children.
   some calloused members of Congress argue that it is cheaper to pay for abortions than to provide post-natal care.
- ... some members of the medical profession describe human pregnancy as "the second leading form of venereal disease."

TO: Pro-Life Action Council P. O. Box 2035

Des Moines, Iowa 50310

Enclosed is my contribution to help defray the costs of printing and mailing (donations are tax deductible).

\_\_\$100 \_\_\$75 \_\_\$50 \_\_\$25 \_\_\$10 \$\_\_

YOUR NAME\_

ADDRESS

CITY/STATE ZIP \_\_\_\_\_ZIP \_\_\_\_

PHONE .

#### ARTICLES OF AMENDMENT

#### TO THE

#### ARTICLES OF INCORPORATION

OF

#### LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

To: The Recorder of Deeds of the District of Columbia, Washington, D. C.

Pursuant to the provisions of the District of Columbia Nonprofit Corporation Act the Board of Directors of Life Amendment Political Action Committee, Inc., adopts the following Articles of Amendment to the Articles of Incorporation of Life Amendment Political Action Committee, Inc.

FIRST: The name of the corporation is:

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LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

SECOND: The period of duration is perpetual.

THIRD: The specific and primary purposes for which this Corporation is formed and for which it shall be exclusively administered and operated are to receive, administer and expend funds for political, charitable and educational purposes in connection with the following:

- To engage in nonpartisan research, study and analysis, for the benefit of the general public, regarding the political structure of the United States;
- To engage in nonpartisan research, study and analysis for the benefit of the general public on those questions affecting the public interest with respect to both the public and private sectors, and to publish the results of such study;
- To prepare educational materials and conduct educational activities in support of the general purposes of the Corporation;

To conduct and sponsor forums, lectures, debates and similar programs; To qualify as a political committee and as a multicandidate political committee pursuant to the provisions of §§301(d) and 320(a)(4) of the Federal Election Campaign Act Amendments of 1976 (or corresponding provisions of subsequent federal election laws); To assist other political, charitable or educational organizations in the conduct of lawful activities; To engage in any and all lawful activities 7. incidental to the foregoing purposes except as restricted herein; 2 To accomplish the foregoing purposes, the Corporation shall also have the power to: 8 sue and be sued; a. b. contract; c. receive property by devise or bequest, subject to the laws regulating the transfer of property by will, and otherwise acquire and hold all property, real or personal, including shares of stock, bonds and securities of other corporations; act as trustee under any trust the 0 objects of which are related to the principal objects of the 2 Corporation, and to receive, hold, administer and expend funds and property subject to such trust; e. convey, exchange, hypothecate, lease, mortgage, encumber, transfer upon trust or otherwise dispose of all property, real or personal; f. borrow money, contract debts and issue bonds, notes and debentures, and secure the payment of and performance of its obligations; and do all other acts necessary or expedient for the administration of the affairs and attainment of the purposes of the Corporation;

The Corporation is not to have members. FOURTH: No part of the net income of the Corporation shall inure to the benefit of or be distributable to its directors, officers, or other private persons, except that the Corporation shall be authorized and empowered to pay reasonable compensation for services actually rendered and to make payments and distributions in furtherance of the purposes and objects set forth in Article THIRD hereof. The business of the Corporation shall be carried on through its Board of Directors; the manner of their election or appointment, other than the initial Board of Directors provided for in the Articles of Incorporation, shall be as provided in the Bylaws. SEVENTH: The private property of the incorporators, directors and officers shall not be subject to the payment of corporate debts to any extent whatever. In furtherance and not in limitation of the powers conferred by statute, the Corporation expressly is authorized to carry on its business and to hold annual or special meetings of its Board of Directors in any of the states, territories or possessions of the United States or the District of Columbia. Upon the dissolution of the Corporation or the winding up of its affairs, the assets of the Corporation shall be distributed exclusively for charitable, religious, 0 scientific, testing for public safety, literary or educational purposes to organizations which are then exempt from federal tax under \$501(c)(3) of the Internal Revenue Code of 1954, or corresponding provisions of any subsequent federal tax laws and to which contributions are then deductible under \$170(c) (2) of such Code or corresponding provisions of any subsequent federal tax laws. ADOPTION: These Articles of Amendment were adopted at a meeting of the Board of Directors held on August 1, 1978 and received a vote of a majority of the Directors in office, - 3 -

there being no members having voting rights with respect thereof. LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC. Attest: ina R. Dacken C

#### BYLAWS

OF

#### LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

#### ARTICLE I - Name and Offices

- §1. Name. The name of this Corporation is Life Amendment Political Action Committee, Inc. ("LAPAC").
- §2. Offices. The principal office of the Corporation is in the District of Columbia. The Corporation also may have offices at such other places as the Board of Directors may appoint.

#### ARTICLE II - Purposes

- §1. General. The specific and primary purposes of the Corporation are set forth in the Articles of Incorporation.
- §2. Restrictions. The Corporation uses its funds only to accomplish objectives and purposes consistent with these Bylaws. No part of such funds shall inure, or be distributed, to members of the Corporation. If the Corporation be dissolved, assets remaining, if any, shall be distributed as provided in the Articles of Amendment to the Articles of Incorporation.

ARTICLE III - Board of Directors \$1. The Board of Directors manages the Duties. business and property and determines the policy of the Corporation pursuant to, and within the scope of, the Articles of Incorporation and the Bylaws. \$2. Composition and Tenure. The Board of Directors consists of seven members. A Director holds office until a successor qualifies. At each annual meeting of the Board 8 of Directors, held in December of each year on a date 2 specified at least 30 days in advance by the Board of 8 Directors, the Board of Directors elects those individuals who shall serve thereon for the terms prescribed herein. Whenever a vacancy occurs for a reason other than expiration of a term of a Director, the remaining members of the Board may fill said vacancy. Effective at the December 1978 annual meeting two Directors shall be elected for one-year .0 terms, two for two-year terms and three for three-year terms. Thereafter, each term will be for three years. Meetings. The Board of Directors meets in \$3. December. If the Board shall fail to designate at least 30 days in advance of said meeting the time and place thereof, said meeting shall be held commencing at 1:00 PM on the first

Monday in December at the principal office of the Corporation. The Board may hold additional meetings at any time and place it may designate upon 10 days written notice to each Director or upon written waiver. The Chairman or the Treasurer may call any such meeting. 54. Chairman of the Board. The Board elects the Chairman, who also serves as President of the Corporation, at its December meeting, to serve until the adjournment of 6 the following December meeting. In the event the office of S the Chairman becomes vacant, the Board elects an individual 8 to serve the unexpired term. 0 §5. Quorum. A majority of the Board of Directors constitutes a quorum provided that if less than a quorum of the Board is present at a meeting duly called a majority of those present may adjourn the meeting from time to time without further notice. C \$6. Resignation. A Director at any time may resign effective upon the date of his actual resignation or upon any successive date by delivering to each Director written notice. Compensation. A Director receives no stated \$7. salary for his services but by resolution of the Board may - 3 -

receive a fixed stipend and/or his expenses of attendance, if any, or both, for actual attendance upon a meeting of the Board. A member of the Board serving the Corporation as an officer or employee of the Corporation or in a contractual capacity may be compensated for such service. \$8. Voting Rights. Each Director has one vote. By a written memorandum filed with the Board of Directors the Board may confirm nunc pro tunc an informal action C taken by the Board and in that event the Directors need m not have been present in the same place at the time of the 00 taking of the action or upon the filing of said written 0 memorandum. Majority. All votes of the Board of Directors 59. are by a three-fifths majority of a quorum unless otherwise C specified in the Bylaws. C 3 Carryover of Term. A member of the Board of Directors serves until a successor is elected and qualifies. 511. Attendance at Meetings. If a member of the Board shall fail to attend three consecutive meetings of the Board without approval or ratification of his actions by the Board, his membership on the Board automatically terminates.

\$12. Parliamentary Rule. ROBERT'S RULES OF ORDER, REVISED, in the most recent edition available, applies to the conduct of business. ARTICLE IV - Officers Designation. At its December meeting the Board of Directors also elects the Secretary and the Treasurer, either of whom need be a Director. Each serves for a term of one year or to fill an unexpired term, whichever is the shorter period. No person, including a Director, simultanœ eously may hold two or more of said offices. 0 52. Agents and Assistants. The Board of Directors may elect such agents and assistants as it may deem necessary for performance of duties delegated to them by the Board. \$3. Compensation. The Board fixes the compensation, including expenditure authorizations and reimbursement of expenditures, for all officers, agents, assistants and other personnel. 54. Removal. The Board of Directors may remove an officer of the Corporation at any time, and without advance notice to him, for any reason which in its judgment best - 5 -

serves the Corporation but may not abrogate a contractual right of any person so removed. \$5. Should an office of the Corpora-Vacancies. tion become vacant, by whatever cause, the majority of the Directors then in office, although less than a quorum, may fill any such vacancy. \$6. Carryover of Term. An officer serves until his successor is elected and qualifies. 2 President and Chairman. The President and Chair-8 man is the chief executive officer of the Corporation, performs those duties normally inherent in said office and O presides over meetings of the Board of Directors. 68. Secretary. The Secretary prepares and maintains minutes of meetings of the Board of Directors, maintains the C records of the Corporation and performs those duties C normally inherent in said office. \$9. Treasurer. The Treasurer is custodian of corporate funds and securities and keeps full and accurate accounts of receipts and disbursements; deposits all monies and othe valuable affects in the name, and to the credit, of the Corporation in such depositories as the Board of Directors - 6 -

amended, and any other applicable law. ARTICLE V - Fiscal Year 3 8 The fiscal year is the calendar year. The fiscal year 1977 commences on the date of incorporation of the Corporation. ~ ARTICLE VI - Indemnification C The Board of Directors shall indemnify the President C 3 and Chairman, the Secretary, the Treasurer, and members of the Board of Directors, the employees and agents of the Corporation and former Presidents and Chairmen, Secretaries, Treasurers and members of the Board of Directors, employees or agents, expenses actually and necessarily incurred by them in connection with the defense of any action, suit or proceeding (actual or threatened; brought by or in the light of the Corporation or otherwise; civil, criminal, administrative

may designate; disburses funds as authorized by the Board;

reports at the December meeting and otherwise when directed

directed by the Board; complies with applicable reporting

Amendment Act of 1976, PL 94-283, 2 USC \$\$431 et seq, as

to the Board; submits to an annual independent audit

and other provisions of the Federal Election Campaign

00040191834

or investigative, including appeal) in which they, or any of them, are made parties, by reason of being, or having been, President, Chairman, Secretary, Treasurer or a member of the Board of Directors, an employee or an agent of the Corporation, except in relation to matters in which any such person shall be judged finally in such action, suit or proceeding to be liable for negligence or for misconduct in the performance of duties. The term "expenses" herein means all amounts paid in settlement by any such person in connection with any such matter as to which the Corporation is advised by counsel selected by the Corporation that such persons to be indemnified did not commit such a breach of duty. The Board of Directors may advance any such expenses prior to the final disposition of the action, suit or proceeding.

## ARTICLE VII - Amendments to Bylaws

These Bylaws may be amended by the Board of Directors upon ten days written notice of intent to amend to each member of the Board of Directors.

## ARTICLE VIII - Notice

Notice of any kind whatsoever to any person holding office in, contracting with or doing business with the

Corporation shall be good and sufficient if mailed certified, postage prepaid to the last known address of record of the addressee, and shall be mailed in good time if postmarked on or before the date which equals or exceeds the number of days requisite for advance notice. ARTICLE IX - Use of Words As appropriate herein, a word may be used in the singular or plural, masculine or feminine. Verbs may be 10 used in the appropriate tense and in the imperative. M œ RATIFIED AND APPROVED BY THE BOARD OF DIRECTORS ON AUGUST 1, 1978 IN WASHINGTON, D.C.  $\subset$ C 0 Attest:



## FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO:

CHARLES STEELE

FROM:

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MARJORIE W. EMMONS

DATE:

JULY 26, 1979

SUBJECT:

MUR 960 - Interim Investigative Report signed by GC 7-24-79, Received by OCS

7-25-79, 11:00

The above-named document was circulated to the Commission on a 24-hour no-objection basis at 4:00, July 25, 1979.

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

July 25, 1979

MEMORANDUM TO: Marge Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 960

Please have the attached Interim Invest Report on MUR 960 distributed to the Commission.

Thank you.

## BEFORE THE FEDERAL ELECTION COMMESSION

In the Matter of ) 79 JUL 25 All: 00

Life Amendment Political ) Action Committee, Inc. )

Life Amendment Political ) Action Committee, South ) Dakota

## Interim Investigative Report

Both respondents, LAPAC, Inc. and LAPAC, S.D., have acknowledged receipt of the Commission's letter and interrogatories. Counsel for LAPAC, Inc. called on July 13, 1979 to say that he was collecting the requested data which will be arriving shortly.

Counsel for LAPAC, S.D., stated in a letter of July 10 that it would be impossible to compile the necessary information until some time prior to the end of July. The Commission has sent counsel for LAPAC, S.D. a letter expressing the Commission's statutory obligation to investigate this matter expeditiously.

7/14/79 Date

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William C. Oldaker General Counsel



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## FEDERAL ELECTION COMMISSION

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

July 25, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James R. Becker
May, Johnson, Doyle, Becker
& Fisher, P.C.
Counselors at Law
412 West Ninth Street
P.O. Box 1443
Sioux Falls, South Dakota 57104

Re: MUR 960

Dear Mr. Becker:

This letter is in response to your correspondence of July 10 requesting an extension of time to respond to the interrogatories. The Federal Election Commission has a statutory obligation to conduct its investigations expeditiously pursuant to 2 U.S.C. §437g(a) (3) (A) and therefore requests that LAPAC, S.D. respond at the earliest possible date, but no later then the end of July.

Your cooperation and expediency in this matter will be appreciated.

Sincerely,

William C. Oldaker General Counsel

	SENDER Complete items 1: 2 and 3 Add your address in the RETU	
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# MAY, JOHNSON, DOYLE, BECKER & PENER LECTION

COUNSELLORS AT LAW

412 WEST NINTH STREET

PO BOX 1443 '79 JUL 16 AM 11: 50

TELEPHONE (605) 186-256

SIOUX FALLS. SOUTH DAKOTA 57104

July 10, 1979

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

Attention: Carolyn Weeder

963056

Re: MUR 960

R G MAY

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GEORGE O. JOHNSON

HAROLD C DOYLE JAMES R. RECKER

GALE E FISHER DERALD W. WIEHL REHARD MOE FOWARD J. LEANY GARY IT JENSEN

Dear Miss Weeder:

I represent LAPAC-S.D. and have been requested to respond to the letter from the Federal Election Commission dated July 2, 1979, addressed to that organization. Enclosed with that letter were numerous interrogatories which were requested to be answered within ten days from the date of that letter.

This is to advise that it will be impossible to completely and accurately answer the interrogatories and to present any facts deemed necessary by LAPAC-S.D. within that time period.

I wanted to advise you of this fact and to assure you that the letter and requested information is not being ignored by LAPAC-S.D. but rather will be furnished to you as soon as it is completed. At the present time, we would anticipate that your requested information will be provided prior to the end of July. If this time frame presents any problem, please advise.

Very truly yours,

James R. Becker

JRB:1ms

CC LAPAC-S.D.

10: pd 9170 6/

...

May, Johnson, Doyle, Becker & Fisher, P. C.

Counsellors at Law

412 West Ninth Street

T P. O. Box 1443

G Sioux Falls, SD 57101

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



### FEDERAL ELECTION COMMISSION

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

July 2, 1979

# CERTIFIED MAIL RETURN RECEIPT REQUESTED

Ms. Ellen Dempsey
Life Amendment Political Action
Committee - South Dakota
Rural Route 1
White, South Dakota 57276

RE: MUR 960

Dear Ms. Dempsey:

The Federal Election Commission has received a complaint which alleges that Life Amendment Political Action Committee - South Dakota (LAPAC, S.D.) 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 960.

The Commission has reason to believe that the matters alleged in the complaint therein state a possible violation of 2 U.S.C. § 441d. Specifically, it appears that:

LAPAC S.D. may have violated 2 U.S.C. § 441d by making expenditures for communications expressly advocating the election of clearly-identified federal candidates without including the required statements of authorization/non-authorization by those candidates.

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

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



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If you have any questions, please contact Carolyn Weeder, the staff member assigned to this matter, at 202/523-4039.

This matter will remain confidential in accordance with 2 U.S.C. Section 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 mattter, please have such counsel so notify us in writing.

Sincerely,

William C, Oldaker General Counsel

Enclosure

### CERTIFIED MAIL RETURN RECEIPT REQUESTED

Ms. Ellen Dempsey
Life Amendment Political Action
Committee - South Dakota
Rural Route 1
White, South Dakota 57276

ME: MUR 960

Dear Ms. Dempsey:

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

If you have any questions, please contact Carolyn Weeder, the staff member assigned to this matter, at 202/523-4039.

This matter will remain confidential in accordance with 2 U.S.C. Section 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 mattter, pages have such counsel so notify us in writing.

Sincerely,

William C. Oldaker Gensual Counsel

Enclosure

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Ellen Dempsey

Life Amendment Political Action Committee, South Dakota

#### INTERROGATORIES

- 1. What is your committee's relationship to LAPAC, Inc.?
- Did you pay any bills for, liquidate any debts for, or transfer any funds to LAPAC, Inc.? If so, please explain.
- 3. Did the federal candidates endorsed in your flyers and brochures in any way consent to, cooperate with, request. or suggest the use of their names or positions in these materials? If so, please explain.
- 4. Please itemize all expenses incurred in the preparation and distribution of every communication (ads, brochures, flyers, etc.) relating to a federal election. Please include and describe expenses incurred for design, layout, printing, postage, salaries, etc. of these communications.
- 5. How did your committee obtain information about the candidates' views on pro-life issues and what costs were incurred in collecting this information?
- Please state exact amounts of expenditures and contributions, and any other monies relating to any federal activities.
   Please itemize and describe each of these expenditures and contributions in detail.
- Is LAPAC, S.D. registered as a political committee in South Dakota? If so, please submit copies of any statements or reports filed with the state.
- Is LAPAC, S.D. incorporated? If so, please submit copies
  of Articles of Incorporation, By-Laws, etc. If not, please
  submit a list of Board members or officers of LAPAC, S.D.
- 9. Has your group ever received money from other pro-life groups? If so, please state the name and address of the group, the amount of money and the date of the transfer of money.
- 10. Has your group ever transferred money to other pro-life groups. If so, please state the name and address of the group, the amount of money and the date of the transfer of money.
- Please submit a copy of every brochure printed and/or distributed by LAPAC, S.D. which mentions in any manner the name(s) of a candidate for federal office.

12. Has your group ever made a contribution to a candidate for federal office. If so, state the name of the candidate and the amount of the contribution.



## FEDERAL ELECTION COMMISSION

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

July 2, 1979

## CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Sean Morton Downey, Chairman
Life Amendment Political Action
Committee, Inc.
P.O. Box 14263, Ben Franklin Station
Washington, D.C. 20044

RE: MUR 960

Dear Mr. Downey:

The Federal Election Commission has received a complaint which alleges that Life Amendment Political Action Committee, Inc. (LAPAC, Inc.) 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 960.

The Commission has reason to believe that the matters alleged in the complaint state a possible violation of 2 U.S.C. § 433, § 434, §441d. Specifically, it appears:

- (1) That LAPAC, Inc. may have violated 2 U.S.C. § 434 by failing to report the liquidation of a debt.
- (2) That LAPAC, Inc. may have violated 2 U.S.C. § 433 by failing to include LAPAC, S.D. and/or other pro-life committees as affiliated organizations in its statement of organization filed with the Federal Election Commission.
- (3) That LAPAC, Inc. may have violated 2 U.S.C. § 441d by making expenditures for communications expressly advocating the election of clearly-identified federal candidates without including the required statements of authorization/non-authorization by those candidates.

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



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

If you have any questions, please contact Carolyn Weeder, the staff member assigned to this matter, at (202) 523-4039.

This matter will remain confidential in accordance with 2 U.S.C. Section 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

Enclosure

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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Sean Morton Downey, Chairman

Life Amendment Political Action
Committee, Inc.
P.O. Box 14263, Ben Franklin Station
Washington, D.C. 20044

RM: MUR 940

Dear Mr. Downey:

The Federal Election Commission has received a complaint which alleges that Life Amendment Political Action Committee, Inc. (LAPAC, Inc.) 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 960.

The Commission has reason to believe that the matters alleged in the complaint state a possible violations of 2 U.S.C. § 433, § 434, §441d. Specifically, it appears that:

- (1) That LAPAC, Inc. May have violated 2 U.S.C. 5 434 by failing to report the liquidation of a nebt.
- (2) That LAPAC, Inc. may have violated 2 U.S.C. \$ 433 by failing to include LAPAC, S.D. and/or other pro-life committees as affiliated organizations in its statement of organization filed with the Federal Election Commission.
- (3) That LAPAC, Inc. may have violated 2 U.S.C. § 441d by making expenditures for communications expressly advocating the election of clearly-identified federal candidates without including the required statements of authorization/non-authorization by those candidates.

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

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

If you have any questions, please contact Carolyn Weeder, the staff member assigned to this matter, at (202) 523-4039.

This matter will remain confidential in accordance with 2 U.S.C. Section 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

Enclosure

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Sean Morton Downey, Chairman

Life Amendment Political Action Committee, Inc.

#### INTERROGATORIES

- What is your relationship with LAPAC, S.D.? Have you ever in any way provided administrative or financial assistance to LAPAC, S.D. or to any other local pro-life committees? Is LAPAC, S.D. a member of LAPAC, Inc. If so, what does this mean in terms of benefits to LAPAC, S.D. or duties?
- Did the federal candidates endorsed in your flyers and brochures in any way consent to, cooperate with, request, or suggest the use of their names? If so, please explain.
- Explain how your committee liquidated the debt of \$669.10 to Harold's Printing Company in your 30-day post general election report and explain why this was not reported.
- Provide a copy of every communication sponsored and paid for by LAPAC, Inc. endorsing any federal candidate and the number of copies of each printed and distributed.
- Itemize and describe in detail all expenses incurred in the preparation and distribution of every communication relating to any federal election, including costs for design, layout, printing, postage, salaries, etc.
- Provide a copy of LAPAC, Inc.'s Articles of Incorporation/ By-Laws and a list of its Board members.

#### BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
Life Amendment Politica	ı í	
Action Committee, Inc	. )	MUR 960
Life Amendment Politica	1 )	
Action Committee - Sc	uth)	
Dakota	)	

#### CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, certify that on June 27, 1979, the Commission, meeting in an executive session at which a quorum was present, determined by a vote of 4-1 to adopt the recommendation of the General Counsel to take the following actions in MUR 960:

- Find reason to believe that Life Amendment Political Action Committee, Inc. may have violated 2 U.S.C. §434 by failing to report the liquidation of a debt.
- Find reason to believe that LAPAC, Inc. and LAPAC, S.D.
  may have violated 2 U.S.C. §441d, 11 C.F.R. §110.11 by
  making expenditures for communications expressly advocating
  the election of clearly identified federal candidates
  without including the required statements of authorization/
  non-authorization by those candidates.
- Find reason to believe that LAPAC, Inc. may have violated 2 U.S.C. §433 by failing to report LAPAC, S. D. and/or other pro-life committees as affiliated organizations in its statement of organization.
- Approve and send the letter and interrogatories attached to the General Counsel's June 20, 1979 report in this matter.

Commissioners Harris, McGarry, Thomson, and Tiernan voted affirmatively for the above actions; Commissioner Friedersdorf dissented; Commissioner Aikens abstained from voting.

6/28/79

Date

Attest:

/ Marjorie W. Ammons Secretary to the Commission

maxine W. Emmons



### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM:

MARJORIE W. EMMONS

DATE:

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JUNE 22, 1979

SUBJECT:

OBJECTION - MUR 960 - First General Counsel's

Report dated 6-20-79; Received in OCS

6-20-79, 11:36

The above-named document was circulated on a 48 hour vote baiss at 4:00, June 20, 1979.

Commissioner Friedersdorf has submitted an objection at 11:18, June 22, 1979, thereby placing MUR 960 on the Executive Session Agenda for Tuesday, June 26, 1979.

June 20, 1979

MEMORANDUM TO:

Marge Emone

FROM:

Jane Colgrow

SUBJECT

MUR 960

Please have the attached First General Counsel's Report on MUR 960 distributed to the Commission on a 48 hour tally basis.

Thank you.

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

RECEIVED OFFICE OF THE COMMISSION SECRETARY

#### FIRST GENERAL COUNSEL'S REPORT

'9 JUN 20 All: 36

DATE AND TIME OF TRANSMITTAL BY OGC TO THE COMMISSION ....... 2 0 19/3 MUR NO. 960
DATE COMPLAINT RECEIVED
BY OGC May 1, 1979
STAFF

MEMBER Weeder

COMPLAINANT'S NAME:

National Abortion Rights Action League

RESPONDENT'S NAME:

Life Amendment Political Action Committee, Inc. Life Amendment Political Action Committee - South

Dakota

RELEVANT STATUTE:

C

2 U.S.C. § 433 § 434, § 441d: 11 CFR § 110.11,

11 CFR § 104.8(a)

INTERNAL REPORTS CHECKED: LAPAC, Inc. registration and reports

Searched for LAPAC, S.D.'s PAC registration

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

The National Abortion Rights Action League filed a complaint alleging that the Life Amendment Political Action Committee, South Dakota (LAPAC, S.D.) and/or the Life Amendment Political Action Committee, Inc. (LAPAC, INC.) violated certain FECA provisions. The complaint alleges the following:

- That LAPAC and/or LAPAC, S.D. may have violated 2 U.S.C § 434 by failing to report expenditures for the preparation and distribution of brochures and flyers endorsing federal candidates.
- (2) That LAPAC, Inc. may have violated 2 U.S.C. § 434 by failing to report the liquidation of a debt.
- (3) That LAPAC, S.D. is a "political committee" which should have registered with the Commission and reported pursuant to 2 U.S.C. § 433, 434.
- (4) That LAPAC and/or LAPAC, S.D. may have violated 2 U.S.C. § 441d by making expenditures for communications expressly advocating the election of clearly-identified federal candidates without including the required statements of authorization/non-authorization by those candidates.

(5) That LAPAC may have violated 2 U.S.C. § 433 by failing to include LAPAC, S.D. and/or other prolife committees as affiliated organizations in its statement of organization filed with the Federal Election Commission. LEGAL ANALYSIS Failure to Report Expenditures for Preparation and Distribution of Communications NARAL alleges that LAPAC, Inc., and/or LAPAC, S.D. failed to report expenditures for the preparation and distribution of brochures and flyers endorsing federal candidates. Of the exhibits submitted by the complainant, two flyers are sponsored and paid for by LAPAC, Inc., and the remaining two flyers by LAPAC, S.D. LAPAC, Inc. has identified only one of these publications in its report, indicated and described in Exhibit "E" as a debt to Harold's Printing Company for the "Printing of 50.000 brochures endorsing candidacy of Larry Pressler - South Dakota-Senate: Leo Thorsness - South Dakota, 1st C.D. House: and James Abdnor - South Dakota, 2nd C.D. House" which is speculated to be Exhibit "C". LAPAC, Inc., reported at least five other expenditures for "Printing" but the specific printed materials were not identified in the report, so we cannot determine from the reports whether or not LAPAC, Inc., reported the expenses incurred in the preparation and distribution of the remaining flyer (Exhibit "C (b)"). LAPAC, S.D. is indicated to be the sponsoring committee for the two remaining flyers (Exhibits "B" and "D"). LAPAC, S.D. has registered with the State Ethics Commission of South Dakota. Its committee report (Exhibit "G") reveals that numerous expenses were incurred for "Advertising" and "Printing." The specific communications have not been identified, which makes it difficult to determine which expenses for what publication have been reported and which have not. In any event, LAPAC, S.D. has not registered as a political committee with the Commission, and therefore none of these expenses have been reported to the Commission. Therefore, the Office of General Counsel recommends that the Commission approve and send the attached letter and interrogatories in an effort to obtain further information. Failure to Report Liquidation of Debt The debt of \$669.10 to Harold's Printing Company reported in LAPAC, Inc.'s 30 day Post-General Election report (Exhibit "E") does not appear as either a debt or an expenditure in the first quarter 1979 report resulting in a possible violation of 2 U.S.C. § 434 and 11 CFR 104.8(a). 11 CFR 104.8(a) specifically states that "these debts [outstanding debts] and obligations shall be reported on separate schedules together with a statement explaining the circumstances and conditions under which each debt and obligation was incurred or extinguished."

- 3 -Therefore, the Office of General Counsel recommends that the Commission find reason to believe that LAPAC, Inc., may have violated 2 U.S.C. § 434 by failing to report the liquidation of a debt. LAPAC, S.D. as a Political Committee FECA defines "political committee" as "any committee, club, association or other group of persons which receives contributions or make expenditures during a calendar year in an aggregate amount exceeding \$1,000," 2 U.S.C. § 431(d). Furthermore, FECA states that "Each political committee which anticipates receiving contributions or making expenditures during the calendar year in a aggregate amount exceeding \$1,000 shall file with the Commission a statement of organization. " 2 U.S.C. §433(a). 2 U.S.C. § 431(f) defines "expenditure" as a "purchase, payment, distribution, loan, advance, deposit, or gift of money or anything of value made for the purpose of influencing the nomination for election, or the election of, any person to federal office, ..." A contribution is "a gift, subscription, loan, advance, or deposit of money or anything of value made for the purpose of influencing the nomination for election, or election, of any person to federal office..." 2 U.S.C. § 431(c). C LAPAC, S.D. sponsored at least two publications marked "Exhibit "B" and Exhibit "E". Both publications are concerned with "influencing a federal election"(as shown in the following subsection) and thus constitute expenditures according to 2 U.S.C. § 431(f). Determination of the exact expenditures incurred for the preparation and distribution of these and other such publications should be investigated. It would seem the expenses for widespread publication and distribution of these ads and flyers in combination with the federally-related monies of the c reported contributions in Exhibit "G" could easily exceed the \$1,000 limitation, thus, triggering registration and reporting responsibilities as a political committee. Further information from LAPAC, S.D. is necessary in order to segregate the exact amount of the monies reported in Exhibit "G" which relates to federal activities and the exact amount which relates to state activities. Therefore, the Office of General Counsel recommends that the Commission approve and send the attached letter and interrogatories to LAPAC, S.D. in an effort to obtain further information on this matter.

-4 -LAPAC, INC. AND LAPAC, S.D.'s Communications as "Express Advocacy" requiring statements of authorization/non-authorization by candidate 11 C.F.R. 109.1(b)(2) defines "Express Advocacy" as "any communication containing a message advocating election or defeat, including but not limited to the name of the candidate, ... " and the FECA requires that authorization/non-authorization statements appear on any communication expressly advocating the election of a clearly identified candidate. 2 U.S.C. §441d, 11 C.F.R. 110.11. The communciations offered by Complainants (Exhibits "B," "C," "C(b)," and "D") are examples of express advocacy of Larry Pressler, Senate; James Abdnor, House; Leo Thorsness, House; and Robert Samuelson, House. The communications specifically identify these candidates who support "pro-life" issues and contain words and phrases such as "Vote Pro-Life," "Vote for the Unborn," "This Little Guy wants you to vote," and "A Vote for these candidates is a vote for Life." These phrases leave no reasonable doubt in the reader's mind that the sponsoring committee is expressly advocating the election of clearly identified federal candidates who support pro-life legislation. In addition, LAPAC, INC.'s listing of the debt to Harold's Printing Company for the publication of Exhibit "C" specifically states that the brochures endorsed (emphasis added) Larry Pressler. Leo Thorsness, and James Abdnor, thus this communication requires statements of authorization/non-authorization delineated in 2 U.S.C. \$441d: §441d. Publication or distribution of political statements Whenever any person makes an expenditure for the purpose of financing communications expressly advocating the election or defeat of a clearly identified candidate through any broadcasting station, newspaper, magazine, outdoor advertising facility, direct mailing, or any other type of general public political advertising. such communication if authorized by a candidate, his authorized political committees or their agents, shall clearly and conspicuously, in accordance with regulations prescribed by the Commission, state that the communication has been authorized; or (2) if not authorized by a candidate, his authorized political committees, or their agents, shall clearly and conspicuously, in accordance with regulations prescribed by the Commission, state that the communication is not authorized by any candidate, and state the name of the person who made or financed the expenditure for the communication, including, in the case of a political committee, the name of any affiliated or connected organization required to be disclosed under section 433(b)(2). Sec also 11 C.F.R. 110.11.

-5 -The attached communication submitted by complainant fail to contain any such statements. Therefore, the Office of General Counsel recommends that the Commission find reason to believe that LAPAC, INC. and LAPAC, S.D. may have violated 2 U.S.C. §441d, 11 C.F.R. 110.11 by making expenditures for communications expressly advocating the election of clearly identified federal candidates without including the required statements of authorization/non-authorization by those candidates. LAPAC, Inc. and LAPAC, S.D. as affiliated committees The FECA requires that political committees include in their statement of organization the names, addresses, and relationships of affiliated or connected organizations. 2 U.S.C. §433(b)(2). Committees are affiliated if "established, financed, maintained, or controlled by the same corporation, labor organization, person, or 9 group of persons, including any parent, subsidiary, branch, division, department, or local unit thereof ... ". 11 C.F.R. 100.14(c)(2). 0 The evidence of coinciding materials and circumstances raise reason to believe that LAPAC, Inc., LAPAC, S.D. and other Pro-Life Organizations in Iowa, Arizona, Minnesota, and Ohio may be affiliated committees. First, the name of Ellen Dempsey appears on both LAPAC, S.D. and LAPAC, Inc. publications as an officer of each committee. On Exhibit "B" Ellen Dempsey is indicated as "Treasurer" of LAPAC, S.D. Ellen Dempsey is also indicated as "State Coordinator, LAPAC, Inc." on Exhibit "C". This coincidence raises questions concerning Ellen Dempsey's role in both committees and concerning the relationship of LAPAC, S.D. to LAPAC, Inc. Secondly, Exhibit "H" indicates that the chairman of LAPAC, Inc., Sean Morton Downey, traveled in October 1978 to make personal appearances endorsing Leo Thorsness (1st CD-So. Dak.) and Roger Jepsen (Sen.-Iowa). The complainant suggests that Downey discussed campaign strategy with local anti-abortion activists. Downey's name appears on Exhibit "C" as "Chairman" along with Dempsey's name as "State Coordinator, LAPAC, Inc." The question of Downey's role and participation in establishing, financing, maintaining, or controlling LAPAC, S.D. and other local pro-life groups calls attention to the need for further investigation in this matter. Third, LAPAC, Inc. flyers and brochures are not unique. example, the same language and same pictures of "This Little Guy wants you to vote" (Exhibit "c") appear on several other pro-life publications endorsing candidates in Iowa, Minnesota, Arizona, and Ohio (See Attachments 1-4). The origin and adoption of this slogan by these and other pro-life committees in relation to LAPAC, Inc.'s influence in this matter requires further investigation.

MUR 960

## SHELDON, HARMON, ROISMAN & WEISS

SUITE SOO
WASHINGTON, D. C. 20005

KARIN P. SHELDON
GAIL M. HARMON
ANTHONY Z. ROISMAN
ELLYN R. WEISS
WILLIAM S. JORDAN, III \*
ADMITTED IN MICHIGAN ONLY \*

TELEPHONE (202) 833-9070

April 30, 1979

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

Dear Ladies & Gentlemen:

On behalf of the National Abortion Rights Action League, ("NARAL") I am filing this complaint of violations of the Federal election law by Life Amendment Political Action Committee, South Dakota ("LAPAC, S.D.") and/or Life Amendment Political Action Committee ("LAPAC"). One or both of these groups made significant political contributions or expenditures during 1978 elections, but failed to report these expenses to the Federal Election Commission.

During the 1978 general elections at least the following political expenditures were made by LAPAC, its South Dakota chapter, or a sympathetic South Dakota group which used LAPAC's name:

- Advertisements costing a total of \$955.00 were run under LAPAC's name endorsing Leo Thorsness, James Abnor, and Larry Pressler. (Exhibit "A")
- At least one additional advertisement was run using LAPAC's name endorsing Pressler, Abnor, and Bob Samuelson. (Exhibit "B")
- "This little guy wants you to vote" brochure bearing LAPAC's name and endorsing Thorsness, Abnor and Pressler was printed for \$669.10 and widely distributed. (Exhibit "C")
- A one page flyer, again supposedly sponsored by LAPAC, also endorsed federal candidates Pressler, Abnor, and Samuelson. (Exhibit "D")

As shown in the attached letter filed with the Commission, LAPAC denies having run the ads listed under #1 above. (Exhibit "A") Since LAPAC does not report contributions to or inkind printing expenditures for the benefit of Thorsness, Pressler

SHELDON, HARMON, ROISMAN & WEISS
The Federal Election Commission
- April 30, 1979
Page 2

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et. al we had assumed that the brochure and flyer were also paid for by the South Dakota Committee. One disturbing piece of information confuses the picture, however. On its 30 day post-general election report LAPAC lists a debt to Harold's Printing Company for \$669.10 for printing 50,000 brochures endorsing Thorsness, Abnor, Pressler. (Exhibit "E") Its first quarter 1979 report, however, shows no such debt and no expenditures. (Exhibit "F") We ask you to investigate whether, LAPAC, South Dakota paid off this debt, or whether LAPAC itself did while failing to report either the expenditure or the in-kind contribution to wipe out the debt.

The cost of printing the brochure was reported to be \$669.10. Estimates for the flyer are \$48.50 for 5,000 and \$91.00 for \$10,000. We ask you to investigate how many flyers were printed, whether additional costs were incurred in preparation and distribution of the brochure and flyer, i.e., design, layout, postage, and salaries and which organization made these political expenditures. We also ask you to investigate how the local political committee obtained information about the candidates' views on pro-life issues. What costs were incurred in collecting this information?

If these expenses were incurred by LAPAC, South Dakota, it clearly should have registered with the Federal Election Commission since the total cost of the ads and printing either the flyers or the brochure exceeds \$1,000.00. §431(d) Obviously the local group should have also filed reports of contributions to it and the expenditures it made.

For your information, we are attaching LAPAC, South Dakota's filings with the State Ethics Commission. (Exhibit "G") These reports indicate direct expenditures and expenditures made on its behalf which total over \$3,000. We ask you to investigate whether these amounts include expenses related to federal elections.

In addition to investigating exactly who made the expenditures, we ask you to investigate how national LAPAC relates to local, allegedly independent, unaffiliated committees. We know that Sean Morton Downey, LAPAC's chairman, traveled to South Dakota in October 1978. See p. 3 of Itemized Expenditures (Exhibit "H") It seems reasonable to think that on his visit he discussed campaign strategy with local anti-abortion activists. We ask you to investigate how much he knew of LAPAC,

SHELDON, HARMON, ROISMAN & WEISS The Federal Election Commission April 30, 1979 Page 3 South Dakota's activities, and whether or not he encouraged or acquiesced in their failing to register with the FEC. For example, the "this little guy wants you to vote" brochure is not unique to South Dakota. The same language and same or similar pictures have been used on Right-to-Life brochures endorsing candidates in Iowa, Arizona, Ohio and Minnesota and perhaps other states. Does LAPAC provide technical assistance and/or advice to local committees? Does it help organize local committees? I have prepared this complaint and believe that it is true and correct to the best of my knowledge. This complaint was not filed on behalf of or at the request or suggestion of any candidate. Sincerely, Gail M. Harmon GMH/dmw Subscribed and sworn to before me this 30 day of 1979, , 1979.

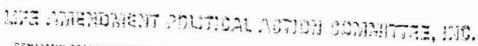
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Please note that a total of 1995.52 was spent for newspaper ads an behalf of Leo Thersness. Let C.P.:James Abinor. 2nd C.O. and tarry Pressler Senite III from South Dakota. The ads were placed by individuals and paid for b. them. They are favorable to our reflected in our report.

Paul A. Brown Treasurer

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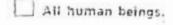
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# ATTENTION ALL VOTERS IN SELECTING YOUR CANDIDATES

YOU are voting on a life or death issue!



Just the planned, the privileged and the perfect.

ONLY a Human Life Amendment will restore the original spirit of the Constitution quarantaeing the right to life to all human beings, born and undorn, young and old, agventaged and handicapsed, weak and strong.

The following candidates support a human Life Amondment:

U.S. Senate: LARRY PRESSLER

U.S. House of Representatives: JAMES ABONCA BOB SAMUELSON

South Dakota Covernor: WILLIAM JANKLOW South Dakota Lt. Governor: LOWELL HANSON

South Dakota Attorney General: MARK METERHENRY MAX GORS

State Treas.: DAVID VOLK

South Dakota Senate: (Dist. 27) LYNDELL PETERSON South Dakota House: (Dist. 27)
GORDON PEDERSON
GEORGE CROUCH
DON HAM
OWEN CADY

These considerer respect the rights of the defenseless.

They will respect yours!

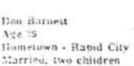
VOTE PRO LIFE!

(This ad written, or ordered and paid for by (APACSD (Life Amendment Political Action Committee, White, 5 D. 57276), Ellen Demasey, Treas.)









A two-term mayor of Rapid City, Don Barnett is the Democrat Party's candidate for the U.S. Senate.

Barn in Hot. Springs. Barned graw up in Rapid City, graduated from-Enoid City High School and South Dakota State. University, He also attendesi graduake school at University of 11100 Nebraska, ite gained rational recognition while mayor following the June IETT flows and the following early spring when militant American archine andducted demonstrations in Rappi City and other Black Hule communities.

He served a four in Villand, as a community proce Army officer. After server to may a Darmett entered private business as Community of a shop and man, a position has the Little



Jim Abdnor Age 55 Hometown - Kennebec Single

A two-term Republican Congressman from this District, Jim Abdnor is running for re-election.

Raised in Kennebec, Abdror graduated from the University of Nebraska and then returned to teach and coach and later started a farm and ranch which he still operates. He has been involved in Heguplican Party politics for a long while serving as a State Senator and Licutement Governor, before being elected to Conviess.

Heisan Army veteran of WWII



Bob Samuelson Age 53 Hometown - Faith Married

Rancher Bob Samuelson is the Democrat Parry's candidate for U.S. Congress from the Second District.

He is a lifelong resident of Meade County where he operates a ranch in partnership with his brother. They also have ranching interests in eastern Montana. He is a graduate of Spearlish High School and saw service during WWII with the Army.

He has been active in various. Yarm-ranch commodity promotion groups and has run unsuccessfully for a seat on the state regist, ture.

Comments, questions on inside pages

## cal people have reservations

and more low income

there is no ram when ended, the such theil two-kind poor," 1977 "is, with modest modifications, the proposal that the President and the Department submitted to Congress that year."

Other changes in the new regulations include more (lexible certification procedures for elderly





## Page Political Action Committee, Inc.)

Indorses and urges your support of the following Pro-Life candilates to the House and Senate of the United States on November 7, 1978:

ARRY PRESSLER has n excellent voting record in the U.S. louse on all pro-life tax issues and las co-sponsored a Human Life members.

LEO THORSNESS will ponsor and promote a Human Life Amendment.

IAMES ANDMOR has one if the best voting records for life in he U.S. House.

#### Vote FOR Life November 7

Sean Morton Downey, Jr., Chairman LAPAC, Inc.

Ellen Dempsey, Stele Coordinator, LAPAC, Inc.

THIS LITTLE GUY WANTS YOU TO YOTE



FOR HIS LIFE
NOVEMBER 7...

## VOTE FOR THE UNBORN

## There is a Difference!

## THORSNESS

DASCHLE

"When elected to Congress 9 would be honored to cosponsor and promote a
Human Libe Amendicent."

"... 9 can't suppost a Huntan Life Amendment."

Leo Thorsness is strongly opposed to our tax dollars being used for abortions.

Daschel would use your tax dollars to abort babies.

## VOTE PRO-LIFE TUESDAY, NOV. 7, 1978

SUPPORT LIFE-PAC

THIS NOVEMBER TO

# g. Druge a



#### A Vote For These Candidates Is

#### A VOTE FOR LIFE

The following candidates support a Human Life Amendment to end the killing of unborn children and guarantee the constitutional right of all human beings to life irrespective of age, health, function or condition of dependency.

For Governor:

WILLIAM JANKLOW ?

For Atty, General

MARK MEIERHEMRY

For Lt. Governor:

LOWELL HAMSEN II

For St. Treasurer:

DAVID VOLK

For U.S. Sanate:

For U.S. House of Rub. JAMES ASSUCA

BOB SAMUELSON

For South Dakota Senate - Dist. 27

LYRIDELL PETERSON

For South Dakota House - Dist. 27 # GORDON PEDERSON ENTELLIN PERRICO

J-DOW HAR

OWEN CADY i-ceorde charces

VOTE FOR THOSE WHO VALUELISE -THEY WILL VALUE YOURS!

Sponsored by LAPAC (Life Amendment Political Action Committee), Hg., White, SD

#### STATEMENT BY THE RAPID CITY YOUTH FOR LIFE:

We are distribution this Lat for LAPAC because THE SUPREME COURT DOES NOT SPEAK FOR US on abortion-

We brown surely framen arms not the right to his garber journey through life.

We believe those who are weak must be helped by the strong at all atteres of life

We believe our elected offices? must have the intelligence, integrity and distance nation to solve cognit problems without resorting to the inhumana solution of killing the heighess

We are plant to once our time and efforts in work for these candidates who have provided that outpost of a flamout de-Amendment.

Dapid City Youth For Life

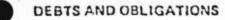
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January, 1973 175 51 EC. 1325 K Street, NW Washington, D.C. 20463





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REVISED \*
January, 1978
Federal Election Commission
1325 X Street, N W.
Washington, D.C., 20483

## OR A CANDIDATE OF COMMITTEE SUPPORTING CANDIDATE(S) FOR NOMINATION OR ELECTION TO FEDERAL OFFICE

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Information Contect:

Federal Election Commission 1325 K Street, N.W., Washington, O.C., 20483

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Approved by GAO 9 161610 (#050e) Lapres 3 3 1 3 1

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

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

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

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SCHEDULZ A
REVISED
January, 1979
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1375 K Street, N W
Washington, D.C. 70463

#### 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

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BCHEDULE C REVISED January, 1978 Feveral Election Commission 1325 K Street, N W Winhington, D.C. 20483

#### DEBTS AND OBLIGATIONS

Supporting Line Numbers 12 and 13 of FEC FORM 3

findicate Primary or General Election for each Entry)

Page 1\_ 01 1\_ 101

Line Number

(Use Securate Schedules for each numbered line)

Lite Ansenderson's Political Action Committee	Tue
Full Name Mailing Address and ZIP Cox of Orbitor of Creditor  CM CA INC.  SROO Edg = 6007Th Ave.  Date Imonth, Attuant of Original Cumulation day, years Debt, Contract, Agreement or To Oal	nt Balance at
Capital Heighis, MD. 20027 12-1-75	,5690
NATURE OF GRUGATION (Details of Details)  ACE. Payable  ACE. Payable  Ace. Payable	
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Full 1.2m., Mulling Address and ZIP Cook of Deptor or Creditor  Date Imonth, Amount of Original Cumula day, year Dept. Contract.  Agreement or To Day  Promise  Dept. Contract.  Agreement or Promise	Balance at .  Cone of This Period
NATURE OF OBLIGATION (Certails of Debt)  Less des 3-1-79 (2) 575 grands	s 21300
SUBTOTALS this period this page (optional)	111990
TOTAL this period (left page this line number only),	111100

SCHEDULE G REVISED January, 1978 Federal Election Commission 1375 K Street, N.W., Washington, D.C. 20483

#### ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Mode) Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3 Prior 2 of 2 for

(Use Senerate Schedules for each numbered line)

NATIONAL RIGHT TO CIFE CONHITTED INC.  S24-14 St. NW #341  RENT-DE2.  WHSHING TON, DC 20045  EXPENDITURE for:  Openmany Oceneral Bether  Date (month, Amount of expends  BAZBAZA BAROODY EXPENSE day, year)  Further period		_		
Full Name, Making Address and ZIP Code  Full N	그림 나라면 되었다. 바다 바다 하다 나라 되었다. 이렇게 하나 나는 사람들이 다른 사람들이 되었다.	D /		/
ATIONAL RIGHT TO LIFE CONTINUE INC.  ST4-14 ST. NW #341  PONT-DE2.  WHSHT NACTON, DC 20045  Expenditure for:  PURISHER, Maning Adoms and ZIP Code  Periodize of Expenditure  Puriodize of Expenditure  P		IDLITICATE HETTON	DHHITTE	E INC.
RENT DEZ.  WASHT NCTON, DC 2001 Expenditure for:  DATA ALA D RROODY  RESIDENT DETAILS OF PRINCIPAL OF Expenditure  BATA ALA D RROODY  RESIDENT DETAILS  RESIDENT DETAILS  RESIDENT DETAILS  RESIDENT DESCRIPTION  DATE SECOND TO THE SECOND TO T	Full Name, Mailing Address and ZIP Cong	Particulars of Expenditure		104 202 202
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Expenditure for:    Print Name, Making Address and ZIP Code   Periodizes for:   Print Name, Making Address and ZIP Code   Peri	524-14 Sr. NW #341		. /.	
Full Name, Making Address and ZIP Code  Princetive I Central I Date (month)  Amount of each espenditure  BAZBAZA DAROODY  GENERAL SCHOOL  GENE			12/19/18	150.00
BAZBAZA BARODY  GO P. O. BOX 14143  WISHINGTON, DC 2004  Full harmer, Making Address and ZIP Code  Full harmer Code Code Code Code Code Code Code Code		G G G G G G G G G G G G G G G G G G G		
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TOTAL PROPERTY OF THE PROPERTY				Amount of care
P. O. DOX 2/23    Septembrane for   Defended   Defended	[[[마다리크리아(#][[]]] [[라마리 []]	Particulars of Expenditure		
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TO A MATERIAL PROPERTY OF THE PROPERTY AND ADDRESS OF THE PROPERTY OF THE PROP	TOTAL this proved that page this line number only	1		16mmz

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#### REGISTRATION FORM AND STATEMENT OF ORGANIZATION

RECEIVED AUG:

face 1

Return Completed Forms to:

Executive Director State Ethics Commission Office of Secretary of State Capitol Building Pierre, South Dakota 57501 (605) 224-3537 New Registration

Secretary of State

| |Registration Amendment

I.D. No. [

(For office use only)

Within fifteen days after receiving contributions or making expenditures in the amount of \$100, or more, all political committees and any person who is not a candidate or a member of a political committee that are required to file state campaign financing statements pursuant to SDCL 12-25-13 and SDCL 12-25-19, must file this statement with the State Ethics Commission.

1. Full name of committee Life Am	andmost Political Action Committee
South Dakota (1	APAC-S. Dat.)
Mailing address _RR1 Wh.	te 5.0. 57276
2. Full name of chairperson rio one	e named at this time.
Mailing address	
Telephone number	
3. Full name of treasurer Ella	Demoscy
Mailine address RRI W/h, 7	Dempsey Le Sa Mak 57276
Telephone number 627-628	1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1
	icket of a party, give name of party
If this committee is the principal campainsought	gn committee of a candidate, give name of candidate and office
6. If this committee supports a selected cand affiliation.	didate or candidates, list them by name, office sought and party
	17, 28
	STATE ETHICS CONSISSION
	STATE ETHICU COMMISSION
	O:110 of 2:0

Title	1 26		
Support () Oppose			
List all affiliated or con-			15
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space allowed is insuf sects containing the nece	ficient to complete the ssary information.	information, attach	appropriately labeled continuation
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certify that the inform complete, true and correc	nation contained in th		and Statement of Organization i
8/15/75		Elden	Dograf
late)		(Signed)	1

Pagy

Secretary of State

Palitical action Committee - South Dakola

#### STATE FITHES COMMISSION

Report of Receipts and Expenditures

	Hen Demp				
_Whit	e South				
75		(City, State, ZH	Code)		
\$ (*#)		TYPE OF REP	ORT		2.
[ ] 7th Day Report Pred	eding Primary Election	on		-	
7th Day Report Pred January 30th Report	eding General Election	on			
M January 30th Repor	(Year)				
[ ] Termination Report					
[ ] Amendment of			Report		
List all hanks or other de	positories and mailing	address in which you	i hold campaign ac	counts and dance	eit campaign fo
List all banks or other de			10.00	•	
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			10.00	•	70
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First Na	nined this report and to	o the best of my kno	wledge and belief	it is true, correct	and complete
Firest Da	nined this report and to	o the best of my kno	wledge and belief	it is true, correct	and complete
First Da	nined this report and to	o the best of my kno	wledge and belief	S. N. S  it is true, correct  Of Candidate or	and complete

Filed this COMMISSION
Office of Secretary
of State

#### STATEMENT OF CASH TRANSACTIONS

	1.	Beginning Cash Balance		5 271.02
	· 2. 3. 4. 5. 6.	Itemized Contributions (Schedule A, Page 3) Loan Proceeds (Schedule B, Page 4) Transfer/Event Proceeds (Schedule C, Page 4) Unitemized Contribution (Total Only) Total Cash Receipts	s <u>437.97</u> s <u></u> s <u>/00.00</u> s <u>396.57</u>	s_934.54
	7.	Total Cash Available		\$ 1205.56
	8. 9	Expenses (Schedule D, Page 4) Payment on Loans This Period (Schedule E, Page 5)	\$ <u>961.11</u> \$	. 3
	10.	Total Cash Disbursements		s 91.1.11
	11.	Ending Cash Balance		s_244.45
-		STATEMENT OF IN-KIND CONTRIBUTION	S	
80	12.	Total Value of In-Kind Contributions (Schodule F, Page 5)		s_703.50
-		STATEMENT OF CAMPAIGN FUND STATU Assets	S .	
_	13.	Cash Balance		\$ 24445
	14.	Other Assets (Savings Accounts, CD's, Stocks, Etc.)		1.00
_				S
=				s
	15.	Add 13 and 14 together  Liabilities and Balance		s 244.45
C.	16.	Accounts and Loans Payable (Schedule G, Page 6)		s
	17.	Balance -	et.	5 244.45
		INSTRUCTIONS		
		TOTAL TRANSPORT TO A STATE OF THE STATE OF T		

#### Line No.

- Beginning Cash Balance-This amount must agree with the Ending Cash Balance (Line 11) from the last furnice report filed.
- 2. Itemized Contribution-List all contributions of \$100 or mere (Schedule A, Page 3)
- Transfer/Event Proceeds- List all transfers from other committees and proceeds from fund raising events (Schedule C, Page 4)
- 5. Unitemized Contributions-Total of Contribution under \$100.
- 6. Total Cash Receipts-Line 2 + 3 + 4 + 5.
- Total Cash Available-Line 1 ± 6.
- Total Cash Disbursements-Line 8 + 9.
- 11 Ending Cash Balance-Line 7 10. This amount most equal Line 13.
- 12. Total Value of In-Kind Contributions-Total of Schedule F, Page 5.
- 14. Other Assets-Do not list office furniture and equipment.
- 16. Accounts and Loans Payable-Total Schedule G, Page 6.
- 17. Balance-Subtract Line 16 from Line 15.

List the name, residence address and principal place of employment of any person who contributed \$100, or more and the amount contributed by that person during the reporting period and aggregate year to date.

DATE Month, Day, Year	NAME AND ADDRESS	PRINCIPAL PLACE OF EMPLOYMENT	AMOUNT OF O	Aggregate year to date
1-7-78 1-29-78 12-28-78 1-9-79 1-15-79	Lois Buns Elkton, S.D.  Teanette Smith bob E. Tellent, Repid City  Mr. + Mrs. Tom Martin 5 27-17 5t. S. Bree  Pat Cassell RR. 1 Volya. SD- 5707  LIPAC Human Fundamisting Chili	Sirel - Repid Fundreisings Kings attorney	100.00	100.00
				2
d'				

Page	01	

TOTAL THIS PERIOD S\_

(Last page only)

Transfer total to Summary Page - Line 2

List name and address of the Bank, name and address of the cosigner and/or guarantors of the note and the amount of the loan,

DATE	NAME AND ADDRESS OF BANK AND COSIGNERS/GUARANTORS	AMOUNT
	EN TOUR SERVICE OF THE STREET	
15%		

Transfer Total to Summary Page - Line 3

#### SCHEDULE C TRANSFERS/EVENT PROCEEDS

List the source and amount of transfers from other committees and/or accounts, and the total proceeds from fund raising events including the date, location and type of event.

DATÉ	SOURCE OR LOCATION AND TYPE OF EVENT		AMOUNT
1-15-79	LAPAC-Huron Fundraising Chili Supper		100.00
		-	

Transfer Total to Summary I'age - Line 4

#### SCHEDULE D EXPENSES

List the amount, purpose, date and check number of all expenditures and the name of each payee,

DATE CHECK NO.		· PAYEE *	PURPOSE	AMOUNT
		Sheet affeched		
		3 16661 204 186.20		
			19	
1 1				

Page \_\_\_\_ of\_\_\_\_

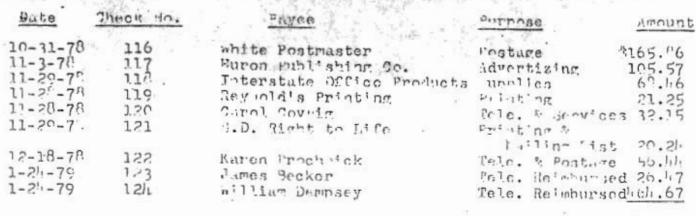
Transfer Total to Summary Page - Line 8

£ 8 8 1 6 1 0 P 0 0 0



#### Schedule

#### 1 xrc iscs



961.11

### SCHEDULE E PAYMENT ON LOANS DURING THIS PERIOD

List the date, check number and names of the payees and the amounts of the loan repayments during this reporting period.

DATE CHECK NO.		CHECK NO. PAYEE AND ADDRESS	
		5	
	*		
	2		
		E .	

Transfer Total to Summary Page - Line 9

TOTAL S \_\_\_\_\_\_(Last Page Only)

#### SCHEDULE F IN-KIND CONTRIBUTIONS

List the information as to the nature of the good or services provided, the name and address of the persons who provided them, and the fair market values if \$100 or more.

NAME AND ADDRESS	NATURE OF GOODS/SERVICES	VALUE
10-27-78 abendeen Fundraising 0-31-78 Rapid City Fudraising 1-1-78 Minnehala area Fundraising Project 1-3-78 Scott Readon 320 E 27 Soun Falls 57105	advertizing Cadvertizing Paraphlets Cadvertizing	110.88 256.32 159.18

Page of

Transfer Total to Summary Page - Laur 12

Total This Period 5 7.63,50 (Last Page Only)

#### SCHEDULE G

#### ACCOUNTS AND LOANS PAYABLE

List information as to the names and addresses of the creditors, date in which loan and/or debt incurred, the amount of the original loan and/or debt, cumulative payment to date and outstanding and/or principal balances owed.

DATE		NAME AND ADD	RESS		AMOUNT OF ORIGINAL LOAN	CUMULATIVE PRINCIPAL PAYMENT TO DATE	OUTSTANDING BALANCE AT CLOSE OF THIS PERIOD
	100	925					
1XI							
		G.				,	
				41		c	
No.		**					
Start .	A 18						
					1		

	-	
Pageo	F	
1.956	-	 

Transfer Total to Summary Page - Line 16

Total This Period 5 (Last Page Only)

8

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### RECEIVED

NUV 1 1978

#### STATE ETHICS COMMISSION

Secretary of State

Report of Receipts and Expenditures

	(Full Name of Candidate or Committee)
	(Full Name of Candidate of Committee)
º/0 E	llen Demosey - Treasurer
R.Rt.	llen Dempsey Treasurer
42 6.	te, South Dakata 57276. (City, State, ZIP Code)
- 62771	(City, State, ZIP Code)
	TYPE OF REPORT
7th Day Report Prece	ding Primary Election on
January 30th Report Prece	사용 (Managarana) : 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1
	(Year)
Termination Report   Amendment of	Report
1 Amendment of	7.000
ist all banks or other dep	ositories and mailing address in which you hold campaign accounts and deposit campaign funds.
frac+ 1. 1:	al Bank, Breakings, S. D. 57006
definite translation	
declare that I have exam	ined this report and to the best of my knowledge and belief it is true, correct and complete.
declare that I have exam	42 353
declare that I have exam	42 353
declare that I have exam	Ellen Dange - Trea. Signature of Candidate or Committee Treasurer
	Ellen Dange - Trea. Signature of Candidate or Committee Treasurer
	Ellen Dange - Ma.  Signature of Candidate or Committee Treasurer  pefore me this 3/44 day of Ciclose 1978.
ubscribed and sworn to b	Signature of Candidate or Committee Treasurer pefore me this 31-44 day of Castoshe, 19-18.
ubscribed and sworn to b	Signature of Candidate or Committee Treasurer pefore me this 31-44 day of Castoshe, 19-18.
ubscribed and sworn to b	Signature of Candidate or Committee Treasurer pefore me this 31-44 day of Castoshe, 19-18.
ubscribed and sworn to b	Signature of Candidate or Committee Treasurer  office me this 3/26 day of Colore 1978  Color of Colore 1978  Notice 16 let a Officer Administering Oath  Fig. Congression Express
ubscribed and sworn to b	Signature of Candidate or Committee Treasurer pefore me this 31-44 day of Castoshe, 19-18.
ubscribed and sworn to b	Signature of Candidate or Committee Treasurer  office me this 3/26 day of Colore 1978  Color of Colore 1978  Notice 16 let a Officer Administering Oath  Fig. Congression Express
ubscribed and sworn to b	Signature of Candidate or Committee Treasurer  office me this 3/26 day of Colore 1978  Color of Colore 1978  Notice 16 let a Officer Administering Oath  Fig. Congression Express
ubscribed and sworn to b	Signature of Candidate or Committee Treasurer  office me this 3/26 day of Colore 1978  Color of Colore 1978  Notice 16 let a Officer Administering Oath  Fig. Congression Express
ubscribed and sworn to b	Signature of Candidate or Committee Treasurer  sefore me this 31-46 day of Catala 1978.  Calculate Candidate or Committee Treasurer  Noticy 18 left a Officer Administering Oath  Live Commission Express  A-y-4 37, 1286
juhscribed and sworn to b	Signature of Candidate or Committee Treasurer  sefore me this 31-46 day of Catala 1978.  Calculate Candidate or Committee Treasurer  Noticy 18 left a Officer Administering Oath  Live Commission Express  A-y-4 37, 1286
declare that I have examinately bubscribed and sworn to be SEAL)	Signature of Candidate or Committee Treasurer  Deform this 31-26 day of Ciclothe 19 18 Confidence Officer Administering Oath  Deform 18 left a 19 19 19 19 19 19 19 19 19 19 19 19 19
juhscribed and sworn to b	Signature of Candidate or Committee Treasurer  sefore me this 31-44 day of Catalae 19-11.  Called Carlot Confidence Officer Administering Oath  Noticy 16 left a Capacity  Live Commission Express  A-y-1 57, 1266

of State



#### STATEMENT OF CASH TRANSACTIONS

	12		
	1.	Beginning Cash Balance	\$0
	2.	Itemized Contributions (Schedule A, Page 3) \$ 100.	00
1	3.	Loan Proceeds (Schedule B, Page 4)	_
0	4.	Transfer/Event Proceeds (Schedule C, Page 4) \$ 326	09
	5.	Unitermized Contribution (Total Only) \$ 709.	.00
	6.	Total Cash Receipts	s 1/35.09
	7.	Total Cash Available	\$ 1135,09
	8.	Expenses (Schedule D, Page 4) \$_864	.07
	9.	Payment on Loans This Period (Schedule E, Page 5) \$	
	10.	Total Cash Disbursements	\$ 864.07
	11.	Ending Cash Balance	\$ 271,02
0			
8		STATEMENT OF IN-KIND CONTRIBUTIONS	
	12.	Total Value of In-Kind Contributions (Schedule F, Page 5)	5 540.43
-	e e	STATEMENT OF CAMPAIGN FUND STATUS Assets	
_	13.	Cash Balance	\$ 271.02
C	14.	Other Assets (Savings Accounts, CD's, Stocks, Etc.)	
4			
1			_ 5
C			
0	15.	Add 13 and 14 together	5 271.02
		Liabilities and Balance	
)	16.	Accounts and Loans Payable (Schedule G, Page 6)	s
		The state of the s	271 02
	17.	Balance	5 271.02
		INSTRUCTIONS	
		11131110111111111	

#### Line No.

- Beginning Cash Balance-This amount must agree with the Ending Cash Balance (Line 11) from the last finance report filed.
- 2. Itemized Contribution-List all contributions of \$100 or more (Schedule A, Page 3)
- Transfer: Event Proceeds- List all transfers from other committees and proceeds from fund raising events (Schedule C, Page 4)
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- 14. Other Assets-Do not list office furniture and equipment.
- 16. Accounts and Loans Payable-Total Schedule G, Page 6.
- 17. Balance-Subtract Line 16 from Line 15.

rage!

#### ITEMIZED CONTRIBUTIONS

List the name, residence address and principal place of employment of any person who contributed \$100, or more and the amount contributed by that person during the reporting period and aggregate year to date.

DATE Month. Day, Year	NAME AND ADDRESS	PRINCIPAL PLACE OF EMPLOYMENT	AMOUNT OF CONTRIBUTION This Aggregate Period year to date	
10/11/78	Mr. + Mrs Harvey Buhl 320 W. Duketa Pierre, S.D. 57501	Own Laundry Chain	100.00 6100,5	

Pageof	
100 Be 20 Con	

Transfer total to Summary Page - Line 2

		· Schedule D	Expenses	
)ate	Cheek No.	Payee	Purpose	amount
19 - 78	101	Index	Bookkeeping Supplies	11.89
27-78	103	-> Hurold's Printing	Printing	18.72
-25-78	102	White Postmaster	Bulk Mailing Dermit + Pas	
-2-78	104	7. 1.	Postage	15.00
-26-78	_	Faut Nat'l Bank	-	9.90
5-11-78	105	White Postmester	~	250.00
2-10-78	106	Index	G G	14.19
0-97-7	8 107	Reynold's Printin		5.42
0-11-78	108		- 1	38.63
5-11-78	109	May, Johnson Doyler C Fisher, D.C.	Lawyer Services	
0-001-7	8 110	South Dab. Right to L.		75.00
0-723-7	8 111	White Postmas		15.00
, - <del>[3</del> 5-,	78 112	Karen Prochnick		
, ¿23-	13 113	- Harold's Printin		74.93
2 B 7-	78 114	Insty Paints	Printing	. 4825
5-30-	78 115	White Postmat		10000
			Ó	
	IC.			#864.07

#### SCHUDULL B LOAN PROCEEDS

List name and address of the Bank, name and address of the cosigner and/or guarantors of the note and the amount of the loan,

DATE	NAME AND ADDRESS OF BANK AND COSIGNERS/GUARANTORS		VMONVI		
	-		9		
- 1					
Page -					

Transfer Total to Summan Page - Line 3

#### SCHEDULE C TRANSFERS EVENT PROCLEDS

List the source and amount of transfers from other committees and/or accounts, and the total proceeds from fund raising events including the date, location and type of event.

DATE	SOURCE OR LOCATION AND TYPE OF EVENT		VAIOLAL
7-10-78 /8-19-78	Sale of Raffle tickets		326.09
	X.	- 1	
	14	*	
1			
t safer		- 1	

Transfer Total to Summary Page - Line 4

#### SCHEDULI D EXPENSES

List the amount, purpose, date and check number of all expenditures and the name of each payee.

DATE	CHECK NO.	PAYEE	PURPOSE	AMOUNT
51		Sheet attached		
				1

Page\_\_\_\_of\_\_\_

Franger Tatal to Summary Page - Line 8

List the date, check number and names of the payees and the amounts of the loan repayments during this reporting period.

DATE	CHECK NO.	, ,	PAYEE AND ADDRESS	AMOUN
			e:	
		2	`	
6 No.				

Transfer Total to Summary Page - Line 9

TOTAL S-----(Last Page Only)

#### SCHEDULE F IN-KIND CONTRIBUTIONS

List the information as to the nature of the good or services provided, the name and address of the persons, who provided them, and the fair market values if \$100 or more.

NAME AND ADDRESS	NATURE OF GOODS/SERVICES VALUE
Scott Reardon, 320 E. 27th, Sieux Fulls, S.	57105 Paid adventizing 540.43

Page of \_\_\_\_

Transfer Total to Summary Page - Line 12

Total This Period S 5 40.43 (Last Page Only)

#### SCHEDULE G

#### ACCOUNTS AND LOANS PAYABLE

List information as to the names and addresses of the creditors, date in which loan and/or debt incurred, the amount of the original lean and/or debt, cumulative payment to date and outstanding and/or principal balances owed.

DATE INCURRED	AMOUNT OF ORIGINAL LOAN	CUMULATIVE PRINCIPAL PAYMENT TO DATE	OUTSTANDING BALANCE AT CLOSE OF THIS PERIOD
		5 9	
•			

Page\_\_\_ of\_\_\_\_\_

Transfer Total to Summary Page - Line 16

Total This Period 5 (Last Page Only)

2.6816101000

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

#### ITEMIZED EXPENDITURES

(b. Jating, 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 3 of 3 for

(Use Separate Schedules for each numbered line)

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# Your vote in the Primary is CRUCIAL!

Your vote in the Primary Election on Tuesday, June 6th, will have the impact of 10 VOTES or more since it is expected that less than 10% of the eligible voters will go to the polls. Don't pass up this unique chance you have to speak out loud and clear for PRO-LIFE—VOTE JUNE6TH!

THIS LITTLE GUY WANTS

Pro-Life Action Council P.O. Box 7149, Grang Station Des Moines, Jowa 50309

BULK RATE U.S. POSTAGE PAID Permit No. 1343 Des Moines, lowa

YOU
TO VOTE
IN THE
JUNE 6TH
PRIMARY

# Vote for the unborn in the June 6th Primary!

The unborn cannot speak for themselves but you can speak for them—with your ballot in the June 6th Primary. Your vote will help to elect candidates who will stand up and defend the most basic of all human rights—the Right To Life! If you will vote on June 6th and also urge two or three of your prolife friends or relatives to vote, the election of pro-life candidates will be assured!

## THE CANDIDATES

### IOWA LIEUTENANT GOVERNOR DEMOCRATIC PRIMARY

#### BILL PALMER

Democrats...make sure you vote for Bill Palmer! As Chairm. not the Senate Budget Committee. Palmer successfully lough: to restrict abortions paid with your tax dollars.

abortioning to the bear conduction in the second of the se

#### REPUBLICAN PRIMARY

#### TÉRRY DRANDSTAD

Republicans ... make sure you pull the lever for Terry Brandstad! Brandstad is one of the strongest Right-To-Life array sates in the lowal Legislature and supports in Pro-Life constitutional amendment.



#### Independent Valeral

If you are a requiremental time of particles, in a control vote in the Propertion of the Police of t

## U. S. SENATE\* REPUBLICAN PRIMARY

#### ROGER JEPSEN

Supports a Pro-Life Constitutional Amendment...oc podes the use of tex money to pay for abortions.

#### LEMURICE VAN MOSTRAND

Opposes a Pro-Life Constitutional Amendment ...suc ports the use of lax money to pay for abortions

#### JOSEPH BEATROOME

Opposes a Pro-Life Constitutional Amendment...or poses the use of tax money to pay for abortions.

\*The Pro-Life Action Council is a state political action committee and cannot legally participate in the endorsement candidates for Federal office. We have, howeve attempted to provide you with those candidates' position on certain pro-life issues.

Enciced is my contribution to help defriction of printing and mailing (donation tax deduction).					
800	SCC or more \$10 \$5 Other I would like to become active in the Pro- Life Nevement.				
1	11:50				

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Proveilla Action Council
P.C. Cas 7110 Crand Station
Dis Council, Java 50009

### Your vote in the General Election is

## crucial

YOUR VOTE IN THE GENERAL ELECTION ON TUESDAY, NOVEMBER 7 WILL HAVE THE IMPACT OF SEVERAL VOTES SINCE IT IS EXPECTED THAT LESS THAN HALF OF THE ELIGIBLE VOTERS WILL GO TO THE POLLS. DON'T PASS UP THIS UNIQUE CHANCE YOU HAVE TO SPEAK OUT FOR THOSE WHO CANNOT SPEAK FOR THEMSELVES. VOTE NOVEMBER 7.

Paid for by Arizonans for Life
Katen M. Mults, Chairman
TOT N. 3rd Street
Phoenix, Arizona 85004

ARIZONANS FOR LIFE 1017 N. 3rd Street Phoenix, Arizona 35004

BULK RATE
U. S. Postage
PAID
PHOENIX, ARIZONA
Permit No. 289

THIS LITTLE
GUY WANTS
YOU
TO VOTE
IN THE
NOV. 7
ELECTION

Unborn children cannot speak for themselves but, you can speak for them with your ballot in the Tuesday. November 7, General Election. Your vote can guarantee that the candidates elected to office will be the people who will stand up and defend the most basic of all human rights — THE RIGHT TO LIFE.

If the candidates listed below win the election, then the unborn and defenseless will win.

HUMAN LIFE IS ENDANGERED!!! Did you know that:

- On January 22, 1973 the U. S. Supreme Court legalized defacts abortion-on-demand to the day of the baby's birth?
- On July 1, 1976 the Court ruled that a girl of 12 may obtain an abortion without her parent's advice or consent, and that a woman can obtain an abortion without the knowledge or consent of her husband — striking at the very heart of the family unit?

THE ELECTION OF THESE PRO-LIFE CANDIDATES WILL HELP ASSURE THE SUCCESS OF OUR GOAL TO RESTORE LEGAL PROTECTION TO THE UNBORN AND DEFENSELESS BY PERMITTING ABORTION ONLY TO PREVENT THE DEATH OF THE MOTHER. YOU ARE URGED TO TAKE 5 PRO-LIFE FRIENDS WITH YOU TO THE POLLS.

Take this brochure with you to the polls

and vote ONLY for the candidates recommended below.

Governor — Evan Mecham
Scoretary of State — Rose Mofford or Henry Haws
Attorney General — Bob Corbin
State Superintendent of Public Instruction — Steve Jenkins
Congressional District 1 — John Rhodes
Congressional District 2 — Tom Richey
Congressional District 3 — — — — —
Congressional District 4 — Eldon Rudd

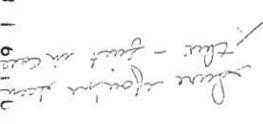
Legislative Districts	Senate	House
District 15	S. H. "Hal" Runyan	James B. Ratliff
District 16	Dr. Wayne Stump	Bob Hungerford
District 17	Anne Lindeman	Wilbert Davis
District 18		Burton Barr, Peta Dunn
District 19		Tony West
District 20	George Hussey	Debbie McCune, Lillian Jordan
District 21		Robert Griffin, Don Kenney
District 22	Manuel Pena, Jr	
District 23		Tony R. Abril, Sr
District 24		Pete Corpstein, David Gorman
District 25	Trudy Camping	D. Lee Jones
District 26		Mary C. Hegarty, Frank Kelley
District 27		
District 23		Tony Raineri, Jim Skelly
District 29	Jacl, Taylor	Donna Carlsen, Jim Caoper -
District 30	Stan Turley	Carl J. Kunasek, James J. Sossainan

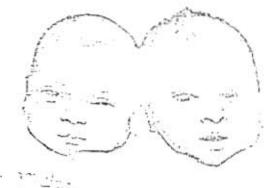
DEMOCRATS, REPUBLICANS AND INDEPENDENTS . . . Unite and help defend those who cannot defend themselves - VOTE PRO-LIFE ON NOVEMBER 7. ---

## CRUCIALIA CRUCIALIA

(8)

Paid for by the Ohio Right To Life Political Action Committee Mary G-gandel, Treasurer 610 South 51d Street Columbus, Ohio 43206





THESE LITTLE
GUYS WANT
YOU
TO VOTE
NO THE
NOV. 7
FIEDTION

THE ELECTION OF A PRO-LIFE GOVERNOR WILL BE ASSURED IF YOU WILL VOTE IN THE ELECTION, TUESDAY, NOVEMBER 7 AND ALSO URGE TWO OR THREE OF YOUR PRO-LIFE FRIENDS AND RELATIVES TO VOTE.

## FOR GOVERNOR



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### JAMES RHODES



### RICHARD CELESTE

- James Rhodes will actively support and work for the Human Life Amendment to end abortion and protect human life.
- dames Rhodes will oppose the use of your tax dellars to pay for abortions.
- ☆ James Rhodes will "strongly support other pro-life legislation."
- Celeste will not support the Human Life Amendment. He insists that it be encumbered with other non-related issues, thus effectively destroying any chance of its passage.
- Celeste will not oppose the use of your tax money for abortion.
- Celeste—although "personally opposed" to abortion, his public position is one of paying for abortions and allowing them to continue.

Other Pro Life State Candidates include:

George Voinovich (R) and Michael Dorrian (D) for Lieutenant Governor Ted Brown (R) and Tony Celebrezze (D) for Secretary of State Thomas Ferguson (D) and Donald Lukens (R) for Auditor of State William Brown (D) and George Smith (R) for Attorney General

DEMOCRATS AND INDEPENDENTS ... YOU TOO SHOULD PARTICIPATE IN THIS YEAR'S MAJOR ELECTION CONTEST BY VOTING IN THE ELECTION NOVEMBER 7. AFTER VOTING FOR GOVERNOR, WE HOPE YOU WILL THEN VOTE FOR OTHER PRO-LIFE CANDIDATES REGARDLESS OF PARTY.

# WOME JANNES BHODES

THE ELECTION OF A PRO-LIFE SENATOR WILL BE ASSURED IF YOU WILL VOTE IN THE DFL PRIMARY, TUESDAY, SEPT. 12 AND ALSO URGE TWO OR THREE OF YOUR PRO-LIFE FRIENDS AND RELATIVES TO VOTE.

# THE CANDIDATES



### BOB SHORT

- ☆Bob Short will actively support and work for a Human Life Amendment to end abortion and protect human life.
- 知思ob Short will oppose the use of tax dollars to pay for abortions.
- Head Short will oppose the use of tax dollars to fund "research" where living babies that survive abortion are used as experimental subjects.

# DONALD FRASER

- Fraser supports the current abortion on damand policy. As a Minneapolis Congressman he worked and testified against the Human Life Amendment.
- Fraser has always voted to use tax dellars to pay for abortions.
- Fraser voted against forbidding the use of tax dollars for "research" where living babies that survive abortion are used as experimental subjects.

WHO FUNDS FRASER? The largest for profit abortion clinis in Minnesota used its newslatter to raise funds for the France compaign. The incorporator of the clinic and the wide each gave the France compaign \$1,000. A major Washington based pro-abortion leady group, the Mational Abortion Rights Action League, gave the Fraser compaign \$3,000.

REPUBLICANS AND INDEPENDENTS... YOU TOO SHOULD PARTICIPATE IN THIS YEAR'S MAJOR PRIMARY ELECTION CONTEST BY VOTING IN THE DFL PRIMARY SEPTEMBER 13, YOU DO NOT HAVE TO DECLARE ANY PARTY AFFILIATION REPORE ENTERING THE VOTING SCOTH, REMEMBER TO VOTE ONLY ON THE DFL SIDE OF THE BALLOT (OR IT WILL NOT BE COUNTED AT ALL). THIS DOES NOT CELICATE YOU IN THE NOVEMBER GENERAL ELECTION, YOU MAY THEN YOU SECRETARY CANDIDATE ON PARTY YOU WISH.

# WOTEBOB SHORT

# GRUGIALL!

(0)

Paid tor hy the Democrato, Republicons and Independenta United for a Provide Senator, Kristine Kremer, Chauman, P.O. Box 19223

Kristine Kremer, Chauman, P.O. Box 19273

Mission Dismond Leke Station Mission (1927)



Democrats, Republicans and Independents United for a Pro-Ida Stepata P.O. Dok 19920 Diamend Lake Station Mpls., Mich. 53110

### LIFE AMENDMENT POLITICAL ACTION COMMITTEE

February 21, 1979

Mrs. Jeanne Pertel 1560 Kanunu St Honolulu, Hawaii 96814

#### BOARD OF DIRECTORS

Sean Morton Downey, Jr.
Chairman
Felicia Goeken

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Paul A. Brown
Treasurer
Jean Doyle
Carolun Garater, M.D.
Robert L. Sassons, Esq.
J. C. Willks, M.D.

ELECTION DAY 1978 INCREASED OUR NUMBER OF PRO-LIFE SENATORS FROM 36 TO 43. IN THE HOUSE OUR PRO-LIFE GAIN AMOUNTED TO ABOUT 30. TRULY OUTSTANDING!

Dear Mrs. Fertel:

C

We all know that regardless of legalistic word-play and whimsical fact-juggling, abortion is murder -- killing a human being.

To kill a hucan being is wrong!

To kill a child is wrong!

To kill a baby is wrong!

To kill a baby in its mother's wort is wrong!

We are writing to you today for two reasons: 1) to report our remarkable pro-life election successes in 1978, and 2) to ask you to join us in producing even greater election successes in 1979 and 1980 -- especially in special elections this year.

Election Day 1978 increased our number of pro-life Senators from 36 to 43. In the House, our pro-life gain amounted to about 30. A significant accomplishment!

National media made great news out of the pro-life victories in Minnesota, North Carolina, Ohio, South Dakota, Iowa, New Hampshire, and several other targeted states.

Let's face it -- one reason a lot of people don't like to talk about or even think about abortion is that often the details are almost too ghastly to repeat. Remember the sensational trial in California last year? (See enclosed clipping.) According to the prosecution and a medical doctor who witnessed the incident, a prominent obstetrician manually choked to death a baby girl approximately an hour after she had been born alive, some 12 hours following the injection of saline to kill the baby in her mother's uterus.

Despite horrors such as this, on January 9, 1979, the Supreme Court struck down a Pennsylvania law which would have made abortionists subject to criminal prosecution under certain circumstances.

It is clear that only an amendment to the Constitution will guarantee the legal protection of life to babies living in their mothers' wombs.

That Human Life Amendment to our Constitution is the single goal of the Life Amendment Political Action Committee. We must elect U.S. Senators and Congressmen who will support a Human Life Amendment.

All of the financial support given to the various campaigns by the Life Amendment Political Action Committee, as well as grants to candidates, came from the generous donations received from loyal supporters like you.

Based on our great pro-life successes of 1978, now is the time to make our big move. In 1979 and 1980 we can achieve the two-thirds majority needed in the Senate and House to release our Human Life Amendment from the stalling tactics of subcommittees.

Here is how we plan to do it.

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LAPAC has already targeted for defeat the following anti-Life Amendment Senators: Birch Bayh, Indiana; Bob Packwood, Oregon; Patrick Leany, Vermont; George McGovern, South Dakota; John Culver, Iowa; and Frank Church, Idaho.

With your help, LMPAC can defeat these first six "senseless assassins of unborn children" and expand the anti-Life Amendment target list. You can help directly to gain the necessary two-thirds majority of pro-life votes on Capitol Hill.

Pirst, take a few moments to complete the questionnaire enclosed, indicating your personal preference about the Huban Life Amenicants in Congressional subcommittees now.

Then return your completed questionnaire and the most generous check you can afford -- \$200, \$100, \$50, \$25 or even \$15 -- to LAPAC.

Your contribution will be used specifically to elect prolife Senators and Congressmen in 1979 and 1980, to prepare for special elections in Wisconsin and California, to send out more questionnaires, and to let candidates know they'll have our financial support.

Frankly, we are too close to winning the necessary twothirds majority now to give up the battle to the anti-life abortionists.

Please send your generous pro-life check with your completed questionnaire in the special reply envelope enclosed for your convenience. We hope you can afford to send at least \$100, but even \$15 will be a great boost to the campaign and candidate support by LAPAC.

Sincerely,

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Sean Morton Downey, Jr. Chairman, LAPAC, Inc.

Paul A. Brown Director, LAPAC, Inc.

P.S. As a result of LAPAC's exposure to millions of Americans on the NBC "Weekend" program of January 21, 1979, many positive things have already happened for LAPAC. We can keep the momentum going and take full advantage of the national publicity we received if we can count on your financial support. Please mail your check today.



### FEDERAL ELECTION COMMISSION

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

### CERTIFIED MAIL RETURN RECEIPT REQUESTED

Ms. Ellen Dempsey
Life Amendment Political Action
Committee - South Dakota
RRI White, South Dakota 57276

RE: MUR 960

Dear Ms. Dempsey:

The Federal Election Commission has received a complaint which alleges that Life Amendment Political Action Committee - South Dakota (LAPAC, S.D.) 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 960.

The Commission has reason to believe that the matters alleged in the complaint therein state a possible violation of 2 U.S.C. § 441d. Specifically, it appears that:

LAPAC S.D. may have violated 2 U.S.C. § 441d by making expenditures for communications expressly advocating the election of clearly-identified federal candidates without including the required statements of authorization/non-authorization by those candidates.

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

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



If you have any questions, please contact Carolyn Weeder, the staff member assigned to this matter, at 202/523-4039.

This matter will remain confidential in accordance with 2 U.S.C. Section 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 mattter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker General Counsel

Enclosure

Ellen Dempsey

Life Amendment Political Action Committee, South Dakota

INTERROGATORIES

1. What is your committee's relationship to LAPAC, Inc.?

2. Did you pay any bills for, liquidate any debts for, or transfer any funds to LAPAC, Inc.? If so, please explain.

3. Did the federal candidates endorsed in your flyers and brochures in any way consent to, cooperate with, request. or succest the use of their names or positions in these materials? If so, please explain.

4. Please itemize all expenses incurred in the preparation and distribution of every communication (ads, brochures, flyers, etc.) relating to a federal election. Please include and describe expenses incurred for design, layout, printing, postage, salaries, etc. of these communications.

- 5. How did your committee obtain information about the candidates' views on pro-life issues and what costs were incurred in collecting this information?
- Please state exact amounts of expenditures and contributions, and any other monies relating to any federal activities.
   Please itemize and describe each of these expenditures and contributions in detail.
- Is LAPAC, S.D. registered as a political committee in South Dakota? If so, please submit copies of any statements or reports filed with the state.
- Is LAPAC, S.D. incorporated? If so, please submit copies
  of Articles of Incorporation, By-Laws, etc. If not, please
  submit a list of Board members or officers of LAPAC, S.D.
- 9. Has your group ever received money from other pro-life groups? If so, please state the name and address of the group, the amount of money and the date of the transfer of money.
- 10. Has your group ever transferred money to other pro-life groups. If so, please state the name and address of the group, the amount of money and the date of the transfer of money.
- Please submit a copy of every brochure printed and/or distributed by LAPAC, S.D. which mentions in any manner the name(s) of a candidate for federal office.

12. Has your group ever made a contribution to a candidate for federal office. If so, state the name of the candidate and the amount of the contribution.



### FEDERAL ELECTION COMMISSION

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

### CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Sean Morton Downey, Chairman Life Amendment Political Action Committee, Inc. P.O. Box 14263, Ben Franklin Station Washington, D.C. 20044

RE: MUR 960

Doar Mr. Downey:

The Federal Election Commission has received a complaint which alleges that Life Amendment Political Action Committee, Inc. (LAPAC, Inc.) 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 960.

The Commission has reason to believe that the matters alleged in the complaint state a possible violation of 2 U.S.C. § 433, § 434, §441d. Specifically, it appears:

- (1) That LAPAC, Inc. may have violated 2 U.S.C. § 434 by failing to report the liquidation of a debt.
- (2) That LAPAC, Inc. may have violated 2 U.S.C. § 433 by failing to include LAPAC, S.D. and/or other pro-life committees as affiliated organizations in its statement of organization filed with the Federal Election Commission.
- (3) That LAPAC, Inc. may have violated 2 U.S.C. § 441d by making expenditures for communications expressly advocating the election of clearly-identified federal candidates without including the required statements of authorization/non-authorization by those candidates.

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



Enclosure

Sean Morton Downey, Chairman

Sex.

Life Amendment Political Action Committee, Inc.

#### INTERROGATORIES

- What is your relationship with LAPAC, S.D.? Have you ever in any way provided administrative or financial assistance to LAPAC, S.D. or to any other local pro-life committees? IS LAPAC, S.D. a member of LAPAC, Inc. If so, what does this mean in terms of benefits to LAPAC, S.D. or duties?
- Did the federal candidates endorsed in your flyers and brochures in any way consent to, cooperate with, request, or suggest the use of their names? If so, please explain.
- Explain how your committee liquidated the debt of \$669.10 to Harold's Printing Company in your 30-day post general election report and explain why this was not reported.
- Provide a copy of every communication sponsored and paid for by LAPAC, Inc. endorsing any federal candidate and the number of copies of each printed and distributed.
- Itemize and describe in detail all expenses incurred in the preparation and distribution of every communication relating to any federal election, including costs for design, layout, printing, postage, salaries, etc.
- Provide a copy of LAPAC, Inc.'s Articles of Incorporation/ By-Laws and a list of its Board members.



### FEDERAL ELECTION COMMISSION

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

May 1, 1979

Ms. Gail M. Harmon Sheldon, Harmon, Roisman and Weiss 1725 I Street, N.W. Suite 506 Washington, D.C. 20006

Dear Ms. Harmon:

This is to acknowledge receipt of your complaints of April 30, 1979, alleging violations of the Federal Election Campaign Laws. Staff members have been assigned to analyze your allegations and a recommendation to the Federal Election Commission as to now these matters 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

Hal Ponder

Assistant General Counsel

Enclosure

MUR 960 SHELDON, HARMON, ROISMAN & WEISS 1025 ISTH STREET, N.W. SUITE 500 KARIN P. SHELDON WASHINGTON, D.C. 20005 TELEPHONE GAIL M. HARMON (202) 833-9070 ANTHONY Z. ROISMAN ELLYN R. WEISS WILLIAM S. JORDAN, III \* ADMITTED IN MICHIGAN ONLY . April 30, 1979 The Federal Election Commission 1325 K Street, N.W. Washington, D.C. 20463 Dear Ladies & Gentlemen: On behalf of the National Abortion Rights Action League, ("NARAL") I am filing this complaint of violations of the Federal election law by Life Amendment Political Action Committee, South Dakota ("LAPAC, S.D.") and/or Life Amendment Political Action Committee ("LAPAC"). One or both of these groups made significant political contributions or expenditures during 1978 elections, but failed to report these expenses to the Federal Election Commission. During the 1978 general elections at least the following political expenditures were made by LAPAC, its South Dakota chapter, or a sympathetic South Dakota group which used LAPAC's name: Advertisements costing a total of \$955.00 were run under LAPAC's name endorsing Leo Thorsness, James Abnor, and Larry Pressler. (Exhibit "A") 2. At least one additional advertisement was run using LAPAC's name endorsing Pressler, Abnor, and Bob Samuelson. (Exhibit "B") 3. "This little guy wants you to vote" brochure bearing LAPAC's name and endorsing Thorsness, Abnor and Pressler was printed for \$669.10 and widely distributed. (Exhibit "C") 4. A one page flyer, again supposedly sponsored by LAPAC, also endorsed federal candidates Pressler, Abnor, and Samuelson. (Exhibit "D") As shown in the attached letter filed with the Commission, LAPAC denies having run the ads listed under #1 above. (Exhibit "A") Since LAPAC does not report contributions to or inkind printing expenditures for the benefit of Thorsness, Pressler

SHELDON, HARMON, ROISMAN & WEISS The Federal Election Commission April 30, 1979 Page 2 et. al we had assumed that the brochure and flyer were also paid for by the South Dakota Committee. One disturbing piece of information confuses the picture, however. On its 30 day post-general election report LAPAC lists a debt to Harold's Printing Company for \$669.10 for printing 50,000 brochures endorsing Thorsness, Abnor, Pressler. (Exhibit "E") Its first quarter 1979 report, however, shows no such debt and no expenditures. (Exhibit "F") We ask you to investigate whether, LAPAC, South Dakota paid off this debt, or whether LAPAC itself did while failing to report either the expenditure or the in-kind contribution to wipe out the debt. The cost of printing the brochure was reported to be \$669.10. Estimates for the flyer are \$48.50 for 5,000 and \$91.00 for \$10,000. We ask you to investigate how many flyers were printed, whether additional costs were incurred in preparation and distribution of the brochure and flyer, i.e., design, layout, postage, and salaries and which organization made these political expenditures. We also ask you to investigate how the local political committee obtained information about the candidates' views on pro-life issues. What costs were incurred in collecting this information? If these expenses were incurred by LAPAC, South Dakota, 51 it clearly should have registered with the Federal Election C Commission since the total cost of the ads and printing either the flyers or the brochure exceeds \$1,000.00. \$431(d) Obviously the local group should have also filed reports of contributions to it and the expenditures it made. For your information, we are attaching LAPAC, South Dakota's filings with the State Ethics Commission. (Exhibit These reports indicate direct expenditures and expenditures made on its behalf which total over \$3,000. We ask you to investigate whether these amounts include expenses related to federal elections. In addition to investigating exactly who made the expenditures, we ask you to investigate how national LAPAC relates to local, allegedly independent, unaffiliated committees. We know that Sean Morton Downey, LAPAC's chairman, traveled to South Dakota in October 1978. See p. 3 of Itemized Expenditures (Exhibit "H") It seems reasonable to think that on his visit he discussed campaign strategy with local anti-abortion activists. We ask you to investigate how much he knew of LAPAC,

SHELDON, HARMON, ROISMAN & WEISS The Federal Election Commission April 30, 1979 Page 3 South Dakota's activities, and whether or not he encouraged or acquiesced in their failing to register with the FEC. For example, the "this little guy wants you to vote" brochure is not unique to South Dakota. The same language and same or similar pictures have been used on Right-to-Life brochures endorsing candidates in Iowa, Arizona, Ohio and Minnesota and perhaps other states. Does LAPAC provide technical assistance and/or advice to local committees? Does it help organize local committees? I have prepared this complaint and believe that it is true and correct to the best of my knowledge. This complaint was not filed on behalf of or at the request or suggestion of any candidate. Sincerely, Gail M. Harmon GMH/dmw Subscribed and sworn to before me this 30 day of 400 , 1979. Notary Public Kateman 1981

### LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

BENJAMIN FRANKLIN STATION . P.O. BOX 14262 . WASHINGTON D.C. 20044 . (202) 638-2961

1. - 15-78

rederal Election Commission wishington, D.C.
Please note that a total of 1955.52 was spent for newspaper ads in behalf of Leo Thorsness, 1st C.D.; James Abinor, 2nd C.D. and tarry Pressler Senate all from South Dakota. The ads were placed by individuals and baid for by them. They are favorable to our PAC and used our name for the disclaimer. These figures are not reflected in our report.

Paul A. Brown Treasurer 11811



# ATTENTION ALL VOTERS IN SELECTING YOUR CANDIDATES

YOU are voting on a life or death issue!

AII	human	beings.

Just the planned, the privileged and the perfect.

ONLY a Human Life Amendment will restore the original spirit of the Constitution quaranteeing the right to life to all human beings, born and unborn, young and old, advantaged and handicapped, weak and strong.

The following candidates support a Human Life Amendment:

U.S. Senate: LARRY PRESSLER

U.S. House of Representatives: JAMES ABDNOR

BOB SAMUELSON

South Dakota Governor: WILLIAM JANKLOW

South Dakota Lt. Governor: LOWELL HANSON

South Dakota Attorney General: MARK MFIFRHENRY

MAX GORS

State Treas .: DAVID VOLK

South Dakota Senate:(Dist. 27) LYNDELL PETERSON South Dakota House: (Dist. 27)
GORDON PEDERSON
GEORGE CROUCH
DON HAM
OWEN CADY

These candidates respect the rights of the defenseless.

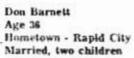
They will respect yours!

#### VOTE PRO LIFE!

(This ad written, or ordered and paid for by LAPAC-SD (Life Amendment Political Action Committee, White, S.D. 57276), Ellen Dempsey, Treas.)







A two-term mayor of Rapid City, Don Barnett is the Democrat Party's candidate for the U.S. Senate.

Born in Hot. Springs, Barnett grew up in Rapid City, graduated from Rapid City High School and South Dakota State University. He also attended graduate school at University Nebraska. He gained national recognition while mayor following the June 1972 flood and the following early spring when militant American Indians conducted demonstrations in Rapid City and other Black Hills communities.

He served a tour in Victnam as a company grade Army officer. After serving as mayor, Barnett entered private business as manager of a shopping mall, a position he still holds.



Jim Abdnor Age 55 Hometown - Kennebec Lingle

A two-term Republican Congressman from this District, Jim Abdnor is running for re-election:

Raised in Kennebec, Abdnor graduated from the University of Nebraska and then returned to teach and coach and later started a farm and ranch-which he still operates. He has been involved in Republican Party politics for a long while serving us a State Senator and Lieutenant Governor, before being elected to Congress.

He is an Army veteran of WWII



Bob Samuelson Age 53 Hometown - Faith Married

Rancher Bob Samuelson is the Democrat Party's candidate for U.S. Congress from the Second District.

He is a lifelong resident of Meade County where he operates a ranch in partnership with his brother. They also have ranching interests in eastern Montana. He is a graduate of Spearfish High School and saw service during WWII with the Army.

He has been active in various farm-ranch commodity promotion groups and has run unsuccessfully for a seat on the state legislature.

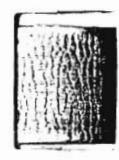
Comments, questions on inside pages

# cal people have reservations

and more low income

nter the program when ended," he said, "will working poor" 1977 "is, with modest modifications, the proposal that the President and the Department submitted to Congress last year."

Other changes in the new regulations include more flexible certification procedures for elderly





# LAPAC

Amendment Political Action Committee, Inc.)

Endorses and urges your support of the following Pro-Life candidates to the House and Senate of the United States on November 7, 1978:

LARRY PRESSLER has an excellent voting record in the U.S. House on all pro-life tax issues and has co-sponsored a Human Life Amandment.

LEO THORSNESS will sponsor and promote a Human Life Amendment.

JAMES ABDNOR has one of the best voting records for life in the U.S. House.

### **Vote FOR Life November 7**

Sean Morton Downey, Jr., Chairman LAPAC, Inc. Ellen Demosey, State Coordinator, LAPAC, Inc. THIS LITTLE GUY
WANTS YOU TO
VOTE



FOR HIS LIFE
NOVEMBER 7

### VOTE FOR THE UNBORN

# There Is a Difference!

# X THORSNESS

DASCHLE

"When elected to Congress .

9 would be honored to cosponsor and promote a
Human Life Amendment."

"... 9 can't support a Human Life Amendment."

Leo Thorsness is strongly opposed to our tax dollars being used for abortions.

Daschel would use your tax dollars to abort babies.

# VOTE PRO-LIFE TUESDAY, NOV. 7, 1978

LIFE AMENDMENT POLITICAL ACTION COMMITTEE. INC.

Benjamin Franklin Station . P.O. Box 14263 . Washington D.C. 20044

A cupy or our report is fined with the Federal Dection Commission and is everable for purchase from the Federal Dection Commission, Washington, D.C.

SUPPORT LIFE-PAC



under the wind which



### A Vote For These Candidates Is A VOTE FOR LIFE

The following candidates support a Human Life Amendment to end the killing of unborn children and guarantee the constitutional right of all human beings to life irrespective of age, health, function or condition of dependency.

For Governor:

WILLIAM JANKLOW 7

For Atty. General

MARK MEIERHENRY 🗲

MAX GORS

For Lt. Governor:

LOWELL HANSEN II

For St. Treasurer:

DAVID VOLK -

For U.S. Senate:

I ARRY PRESSLER

For U.S. House of Rep. JAMES ABONOR

BOB SAMUELSON defect

For South Dakota Senate - Dist. 27

LYNDELL PETERSON

For South Dakota House - Dist. 27

GORDON PEDERSON

DON HAM

KATHLEEN PERRIGO

OWEN CADY

S GEORGE CROUCH

× 228 elected

### VOTE FOR THOSE WHO VALUELIFE -THEY WILL VALUE YOURS!

Sponsored by LAPAC (Life Amendment Political Action Committee), Hq., White, SD

### STATEMENT BY THE RAPID CITY YOUTH FOR LIFE:

We are distributing this list for LAPAC because THE SUPREME COURT DOES NOT SPEAK FOR US on abortion

We believe every human being has the right to his or her journey through life

We believe those who are weak must be helped by the strong at all stages of life

We believe our elected officials must have the intelligence, integrity and determination to solve social problems without resorting to the inhumane solution of killing the helplass.

We are glad to give our time and efforts to work for these candidates who have pledged their support of a Human Life Amendment

Rapid City Youth For Life

If you share our concern and wish to join or help in any way, call: 347 6136.

WELOVELIFE!

Repuil City, S. Duch 5 101

SCHEDULE LAPACE
REVISED 304 Day Follow
January, 1978 178 5 6016
Feteral Election Commission
1325 K Street, N W
Washington, DC 70463

### **DEBTS AND OBLIGATIONS**

### Supporting Line Numbers 12 and 13 of FEC FORM 3

(Indicate Primary or General Election for each Entry)

Pape 2 of 2 100

Line Number 13\_

(Use Separate Schedules for each numbered line)

Harold's Frenders Company	Date Impath, day, searl	Amount of Original Drbt, Contract, Agreement or Promise	Payment To Date	Outstanding Balance at Close of This Period
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The Life Contition of PH	Date Imenia, day, sear)	Amount of Original Drbt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding - Balance as - Cicre of - This Farious
ATURE OF OBLIGATION (Details of Detail		11000	, —	1,000
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Primary   General Donner	11:/2:7	Debt, Contract, Agreement or Promise	Payment	Barance a Crose of This Period
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Primary   General Donner  NATURE OF OBLIGATION (Depart of Debit)	11:/2:7	Debt, Contract, Agreement or Promise	Payment	Barance at Conse of This Perio

FEC FORM S ALVILLO . Jenuery , 1978 Federal Election Commission 1325 K Street, N W. Washington, D.C. 20483

### POHT OF HECLIPIS AND EXPENDIT THES FOR A CANDIDATE OF COMMITTEE SUPPORTING CANDIDATE(S) FOR NOMINATION OR ELECTION TO FEDERAL OFFICE

(Except for Candidates or Committees Receiving Federal Matching Funds)

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	Dr.	· LD
C: 1		

^		0 0000
LIFE AMENDMENT P.A.C.	1.D. No. C 000 P	2297
Name of Candidate or Committee (in full)		nd-dete/Committee
P.O. BOX 14263 BOD FRANKLIN STN.		
Address (number and street)	Office Sought, State/District	(if applicable)
WASHINGTON, DC 20045		
City, State and ZIP Code	previously reported.	Year of Election 1978
Type of Report (check appropriate boxes)		
☐ Tenth day report preceding		☐ Termination Report
Duly 10 Quarterly Report on in the State of		D Amendment for:
July 10 Quarterly Report on in the State of		D ANG-OHITH
October 10 Overterly Report		Lakish sanoal
Denuary 31 Annual Report   Thirtieth day report following	el or commention)	(which report)
Monthly Record in the State of		
(month) (dete)		
The is a report for Primary Election General Election DP	rimary and General	Other (special, runoff, etc.)
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SUMMARY OF RECEIPTS AND E (Figures may be rounded to near		
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Cash on hand at beginning of reporting period	1 682.45	
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		1 96 262.84
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column 8)		,
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Cash on hand at close of reporting period (Subtract line 9 from line Bal	1194.21	1194.21

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

rein mr.; not be copied for use 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)

NA	ME OF CANDIDATE OR COMMITTEE	REPORT COVERING THE PERIOD FROM: TO:		
	RECEIPTS	Column A This Period	Column B Calandar Year-To-Date	
14.	Contributions from Ind-viduals (including contributions in-kind):  (a) Itemized (use Schedule A)	6032.71	6/2/25/	
15.	Edi Subrotal of contributions from individuels  Transfers from Portical Committees:  La) Funds from affiliated/authorized committee (Itemize on Schedule A		, 96262.84	
	to Contributions in Aind from political committees  (Itemize on Schedule A regardless of amount)  (c) Contributions in Aind from political committees  (Itemize on Schedule A regardless of amount)			
16.	(d) Subtotal of transfers in and contributions in-kind from political committees Other Income		5	
-	Is i termized tuse Schedule Ai	. \$		
-	(a) Item-red fine Schedule A).  (b) Unitem-red  (c) Subtotal of loans and loan repayments received		5	
.18.	Refunds, Retains, Resums of Deposits:  (a) Itemized fuse Schedule A)	. \$	•	
19.	(c) Subtotal of refunds, rebates, returns of deposits	1024 41	· 96262.84	
F	EXPENDITURES			
20.	Operating Expenditures:	6001 3/		
F	la) tremized luse Schedule B1,	1 3/3.59	\$ 95068.63	
-	Linens, Loan Repayments, and Contribution Refunds Made:  [all Itemized Juse Schedule B]  [b] Unitemized  [c] Subtotal of Joans and Joan repayments made and contribution refunds		s	
22.	Transfers Out to Political Committees:  [a) To affiliated/authorized committee (Itemize on Schedule Biregardiess of amount)  [b) To other committees (Itemize on Schedule Biregardiess of amount)			
	fc1 Contributions in kind to other committees.  firemize on Schedule Biregardless of amount).  (d) Subtrotal of transfers out.	: /		
	Indexendent Expenditure Iuse Schedule E1.  Coord-nated Expenditures Made by Political Committees (2 U.S.C. 441afd))  Illiemize on Schedula F1.		5	
25.	Total Expenditures	: 6320.95	: 95068.63	
	RECEIPTS AND EXPENDITURES.  NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES.			
25	Total Riceiots (from line 19)			
1	Transfers in (from line 15(a))	**********		
	Net Receipts (Subtract line 27 from line 26)			
1	Total Expenditures (from line 25)			
	het Expenditures (Subtract line 20 from line 29).			
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RCHEDULE A REVISED January, 1978 Faderal Election Commission 1325 K Street, N W Washington, D.C. 20483

### 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 \_\_\_ of \_\_\_ for

(Use Separate Schedules for each numbered line)

Life Amendment Pole	trial Action Commit	tee Inc	<u>.</u> .
MA. T. J. Commons	Principal Place of Business	Date Imonth, day, year)	Amount of each Recept this Pyriod
Neptone, N.J. 07753	Occupation Voters &	11-28	1000
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Fa-20, N.D.	Occupation  Check if Contributor is self-employed	12-11	1000
Full Name, Mailing Address and ZIP Code	Aggregate Year To Date . \$ Frincipal Piace of Business	Date (month,	Amount of each fixener
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Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date Importh, day, year?	Amount of each Receipt this Period
Bix 1043 Overstore, KY	Occupation	12-21	100 ==
D Primary D General D Other	O Check of Contributor is self-employed Appreciate Year To Date \$	-	
N. J. Nibler 14163 Franch to Pd. X	Principal Place of Business	Date Imonth, day, years	Amount of each Receipt this Period
Woodbann, OR 97071	Occupation	12-18	10000
Full Name, Mailing Address and ZIP Code	Apprepare Year To Date \$ Principal Place of Business	Date (month, day, year)	Amount of each Receipt
V. Besena 21 C/B Gands So.	Occupation		
Florissart, Me	O Check if Contributor is self-employed  Aggregate Year To Date \$	12-19	200 =
P. R. North	Principal Pike of Business	Date Imonth, day, year)	Amount of each Riceros this Period
Fort Worth, TX	Occupation	11-21	1000
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SCHEDULE C REVISED January, 1978 Febrai Election Commission 1225 K Street, N W Washington, D C 20463

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### DEBTS AND OBLIGATIONS

Supporting Line Numbers 12 and 13 of FEC FORM 3

(Indicate Primary or General Election for each Entry)

m LaLa

Line Number

(Use Separate Schedules for each numbered line)

Life Ansendment Politica  Full harms Marine Andrew and ZIP Cox of Deblor or Circles  CMCA INC  8800 Edgeworth Ave.	1	Attuant of Disphall Drbt, Contract, Agreement or Fromise	Cumulative Payment To Date	Outsignting Balance of Cose of This Period
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FULL Name Making Address and ZIP Code of Debtor or Creditor  Dozin Storm  2110 Marting Address and ZIP Code of Debtor or Creditor	Date Importh,	Amount of Original Dibt. Contract, Agreement or	C mulative Payment	Dutationship Balance at Oose of

SCHEDULE B REVISED January, 1978

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

### ITEMIZED EXPENDITURES

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

(Use Separate Schadules for each numbered line)

Name of Candidate or Committee in Full	) 1		/
LIFE HYENDHENT TO		COMMITTE	E /NC.
NATIONAL RIGHT TO CIFE GO	Particulars of Expenditure	Date Imonth,	Amount of each expendi-
NATIONAL RIGHT TO LIFE CO	MITTE INC.	day, year)	tive this period
524-14 ST. NW #341	RONT- DEC.	12/19/18	100
WASHINGTON, DC 20045	Expenditure for:    Primary   General   Gother	12/19/10	150.00
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BARBARA BAROODY	expense	day, year)	ture this period
40 P.O. BOX 14263	RETHBURSEHENT	12/19/28	
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		1/21/18	305.98
WASHINGTON DC 2005	S DAIMON D General Danner.	170	003.70
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P. A. BROWN	TELEPHONE EXPEN.	day, year)	ture this period
P.O. BOX 14263	NOU/DE	12/1	- 1-2
WASHINGTON, DC 2008	Expenditure for	1721/28	274.88
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month,	Amount of each expendi-
		day, year)	ture this period
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	Expenditure for:	-	
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Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date Imonth,	Amount of each expend-
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	□ Primary □ General □ Other		
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and a second sec	Property of the second	day, year)	ture this period
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	Druney General DOther		
SUBTOTAL of expend-tures this page (restional)			: 1250.06 : 6007.36
			. /

### REGISTRATION FORM AND STATEMENT OF ORGANIZATION

RECEIVED

Return Completed Forms to:

Executive Director State Ethics Commission Office of Secretary of State Capitol Building Pierre, South Dakota 57501 (605) 224-3537 New Registration

Secretary of Stee

| |Registration Amendment

I.D. No. 1

(For office use only)

Within fifteen days after receiving contributions or making expenditures in the amount of \$100, or more, all political committees and any person who is not a candidate or a member of a political committee that are required to file state campaign financing statements pursuant to SDCL 12-25-13 and SDCL 12-25-19, must file this statement with the State Ethics Commission.

_1	- South Dallota (LAPAC - So Date)
	Mailing address BRI White S.D. 57276
2	Full name of chairperson no one named at this time.
	Mailing address
	Telephone number
7	
,	Mailing address RRI White, So. Date 57376
	Telephone number 627-6281
	Telephone number E & L & & Ø
1	
7	If this committee is supporting an entire ticket of a party, give name of party
5	If this committee is the principal campaign committee of a candidate, give name of candidate and office sought
5	If this committee is the principal campaign committee of a candidate, give name of candidate and office sought  If this committee supports a selected candidate or candidates, list them by name, office sought and party affiliation.
5	If this committee is the principal campaign committee of a candidate, give name of candidate and office sought  If this committee supports a selected candidate or candidates, list them by name, office sought and party
5	If this committee is the principal campaign committee of a candidate, give name of candidate and office sought  If this committee supports a selected candidate or candidates, list them by name, office sought and party affiliation.  There of the principal campaign committee of a candidate, give name of candidate and office sought and party affiliation.
5	If this committee is the principal campaign committee of a candidate, give name of candidate and office sought  If this committee supports a selected candidate or candidates, list them by name, office sought and party affiliation.  The area of this this time.
5	If this committee is the principal campaign committee of a candidate, give name of candidate and office sought  If this committee supports a selected candidate or candidates, list them by name, office sought and party affiliation.

Support () Oppose ()	T.
	zations.
36	
If space allowed is insufficient to constitute containing the necessary informa-	mplete the information, attach appropriately labeled continual tion.
	CERTIFICATION
I certify that the information contain complete, true and correct.	ned in this Registration Form and Statement of Organization  Cler Dengrey  (Signed)
8/15/78 Date)	0

The sale of the sale of the sale of

IAM 30 1979

Page 1

Secretary of State

### STATE FITHCS COMMISSION

Report of Receipts and Expenditures

Life amendment Political action Committee-South Dakota

	TVDE OF REPORT
	TYPE OF REPORT
7th Day Report Preceding Primary	Election on
7th Day Report Preceding General January 30th Report	Election on
(Year)	<del>/</del>
Termination Report	
Amendment of	Report
List all banks or other depositories and	mailing address in which you hold campaign accounts and deposit campaign
F + D 1 1	Q 1 B 1. 2 6 N 52001
First lational	Bank, Brackings, S.D. 57006
	ort and to the best of my knowledge and belief it is true, correct and comple
declare that I have examined this repo	and to the best of my knowledge and belief it is true, correct and comple
declare that I have examined this rep-	- 1995 - 1996
declare that I have examined this rep.	- 1995 - 1996
declare that I have examined this rep.	Eller Dendicute or Committee

Filed this \_\_\_

STATE ETINCS COMMISSION Office of Secretary

of State

### STATEMENT OF CASH TRANSACTIONS

	1.	Beginning Cash Balance		5-271.02
	2. 3. 4. 5. 6.	Itemized Contributions (Schedule A, Page 3) Loan Proceeds (Schedule B, Page 4) Transfer/Event Proceeds (Schedule C, Page 4) Unitemized Contribution (Total Only) Total Cash Receipts	\$ 437.97 \$ \$ 100.00 \$ 396.57	
	7.	Total Cash Available		\$ 1205.56
	8. 9.	Expenses (Schedule D, Page 4) Payment on Loans This Period (Schedule E, Page 5)	\$.961.11 \$	
	10.	Total Cash Disbursements		s_961.11_
•	11.	Ending Cash Balance		\$ 244.45
3	)	STATEMENT OF IN-KIND CONTRIBUTION	S	
0	12.	Total Value of In-Kind Contributions (Schedule F, Page 5)		\$ 703.50
0	51	STATEMENT OF CAMPAIGN FUND STATU Assets	S	
-	13.	Cash Balance		5 244.45
0 7 0	14.	Other Assets (Savings Accounts, CD's, Stocks, Etc.)		5
0	15.	Add 13 and 14 together  Liabilities and Balance		\$ 244.45
	16.	Accounts and Loans Payable (Schedule G, Page 6)		s
	17.	Balance .	,	5 244.45

#### INSTRUCTIONS

#### Line No.

 Beginning Cash Balance-This amount must agree with the Ending Cash Balance (Line 11) from the last finance report filed.

2. Itemized Contribution-List all contributions of \$100 or more (Schedule A, Page 3)

- Transfer/Event Proceeds- List all transfers from other committees and proceeds from fund raising events (Schedule C, Page 4)
- 5. Unitenized Contributions-Total of Contribution under \$100.
  - 6. Total Cash Receipts-Line 2 + 3 + 4 + 5.
  - Total Cash Available-Line 1 + 6.
- Total Cash Disbursements-Line 8 + 9.
- 11. Ending Cash Balance-Line 7 10. This amount must equal Line 13,
- Total Value of In-Kind Contributions-Total of Schedule F, Page 5.
- 14. Other Assets-Do not list office furniture and equipment.
- 16. Accounts and Loans Payable-Total Schedule G, Page 6.
- 17. Balance-Subtract Line 16 from Line 15.

### SCHEDULE A

### ITEMIZED CONTRIBUTIONS

List the name, residence address and principal place of employment of any person who contributed \$100 or more and the amount contributed by that person during the reporting period and aggregate year to date.

DATE Month. Day, Year	NAME AND ADDRESS	PRINCIPAL PLACE OF EMPLOYMENT	AMOUNT OF ( This Period	ONTRIBUTION Aggregate year to date
11-7-78 11-29-78 12-18-78 1-9-79 1-15-79	Lois Buns Elkton, S.D.  Tranette Smith bou E. Tallent, Repid City  Marmos. Tom Martin 5 27-17 "St. S. Bre  Pat Cassell R.R. I Volya. SD- 570  LIDAR Hance Food missing Ch. I	sized - Keped Fundraisings although attorney  them wife	100.00	100.00
	2			
×	-			
	**			

Page of

TOTAL THIS PERIOD S 4 27.97
(Last page only)

Transfer total to Summary Page - Line 2

### LOAN PROCEEDS

List name and address of the Bank, name and address of the cosigner and/or guarantees of the note and the amount of the loan.

	DATE	NAME AND ADDRESS OF BANK AND COSIGNERS/GUARANTORS	AMOUNT
			1
1	1		

Transfer Total to Summary Page - Line 3

### SCHEDULE C TRANSFERS EVENT PROCEEDS

List the source and amount of transfers from other committees and/or accounts, and the total proceeds from fund raising events including the date, location and type of event.

AMOUNT	SOURCE OR LOCATION AND TYPE OF EVENT	DATE	
100.00	LAPAC-Huran Fundraising Chili Supper	1-15-79	
		4	
		,-,3-,,	

Transfer Total to Summary Page - Line 4

#### SCHEDULE D EXPENSES

List the amount, purpose, date and check number of all expenditures and the name of each payee.

DATE	CHECK NO.	PAYEE	PURPOSE	AMOUNT
		Sheet attached		
		3 16661 364 146 166		

Page \_\_\_\_\_ of \_\_\_\_\_

Transfer Total to Summary Page - Line 8

P & 6 1 6 1 L L U U B

Date	Theek No.	Payee	Furnose	Amount
10-31-78	116	white Postmaster	Postage	3165.06
11-3-78	117	Euron Fublishing Co.	Advertizing	105.57
11-20-78		Interstate Office Products	unnlies	69.116
17-28-78	119	Rey old's Printing	Polinting	21.25
11-20-7		Giral Covein	Prie. A Gravic Prietina A	
12-18-78	122	Karen Prochatck	Tele. % Postor	
1-24-79	13	James Becker	Calc. Hotebury	ed 26.47
1-21-79	12/1	ailliam Dempsey	Tele. Reimburs	sedlich.67
- 12				961.11

C

## SCHEDULE E PAYMENT ON LOANS DURING THIS PERIOD

List the date, check number and names of the payees and the amounts of the loan repayments during this reporting period.

DATE	CHECK NO.	PAYEE AND ADDRESS	AMOUN
		St. The second s	
1			
- 1	ľ	•	

Transfer Total to Summary Page - Line 9

TOTAL S\_\_\_\_\_(Last Page Only)

#### SCHEDULE F IN-KIND CONTRIBUTIONS

List the information as to the nature of the good or services provided, the name and address of the persons who provided them, and the fair market values if \$100 or more.

NAME AND ADDRESS	NATURE OF GOODS/SERVICES	VALUE
10-27-78 abendeen Fundraising 10-31-78 Rupid City Fudraising 11-1-78 Minnehala aren Fundraising Project H-3-78 Bette Blue Representing 11 15/10/2018 11-1-78 Scott Readon 320 E 27 Sout Fulls 57/05	Cadvertizing Pamphlets Savertizing	710.80 282 32 15918 151 20

Page \_\_\_\_ of \_\_\_\_\_

Transfer Total to Summary Page - Line 12

Total This Period S 7 03,50 (Last Page Only)

List information as to the names and addresses of the creditors, date in which loan and/or debt incurred, the amount of the original loan and/or debt cumulative payment to date and outstanding and/or principal balances owed.

DATE INCURRED	NAME AND ADDRESS	AMOUNT OF ORIGINAL LOAN	CUMULATIVE PRINCIPAL PAYMENT TO DATE	OUTSTANDING BALANCE AT CLOSE OF THIS PERIOD
•	*			
-				
			,	
•				

## RECEIVED

NUV 1 1978

#### STATE FITHCS COMMISSION

Secretary of State

Report of Receipts and Expenditures

Lile (Imendmen	
(Ful	Il Name of Candidate or Committee)
% Ellen Den	nosex - Treesurer
B. Rt. 1	opsey Treasurer
112 hite Sout	(City, State, ZIP Code)
willing, sour	(City, State, ZIP Code)
	TYPE OF REPORT
1 7th Day Report Preceding Primary Election	n on
7th Day Report Preceding Primary Election 7th Day Report Preceding General Election	non November 7, 1978
[ ] January 30th Report (Year)	
[ ] Termination Report	
[ ] Amendment of	Report
List all banks or other depositories and mailing	address in which you hold campaign accounts and deposit campaign funds.
7 + n 1. 1 B. k	, Baco Kingso, S. D. 57006
Tire Halice at Carls	, 1000 Aug Se, S. D. 37000
I declare that I have examined this report and t	to the best of my knowledge and belief it is true, correct and complete.
	Signature of Candidate or Committee Treasurer
Subscribed and sworn to before me this 3/	day of October 19 11
	Petert b. Coleman
(SEAL)	title 1 C. Collection
	Notery Paletic Officer Administering Oath
	the Commission Exprises
	1 1 1 1 1 1 1 1 1
and the second second	Aug . 4 37, 1986.
	Filed this
	day of Nor 19 78 Reg.
	STATE ETHICS CONCISSION
	Office of C

of State

#### STATEMENT OF CASH TRANSACTIONS

	1.	Beginning Cash Balance	s
0.00	2. 3. 4. 5.	Itemized Contributions (Schedule A, Page 3)  Loan Proceeds (Schedule B, Page 4)  Transfer/Event Proceeds (Schedule C, Page 4)  Unitemized Contribution (Total Only)  \$ 709.00	
	6.	Total Cash Receipts  \$ 709.00	s 1/35.09
	7.	Total Cash Available	\$ 1135.09
	8. 9.	Expenses (Schedule D, Page 4)  Payment on Loans This Period (Schedule E, Page 5)  \$ 864.67  \$	
	10.	Total Cash Disbursements	s 864.07
0	11.	Ending Cash Balance	5 271,02
M	)	STATEMENT OF IN-KIND CONTRIBUTIONS	
6	12.	Total Value of In-Kind Contributions (Schedule F, Page 5)	540.43
o	. 4	STATEMENT OF CAMPAIGN FUND STATUS Assets	
•	13.	Cash Balance	s 371.02
	14.	Other Assets (Savings Accounts, CD's, Stocks, Etc.)	5
C	15.	Add 13 and 14 together  Liabilities and Balance	\$ 271.02
	16.	Accounts and Loans Payable (Schedule G, Page 6)	s
	17.	Balance	\$ 271.02
		ANGED LIGHTONIA	

#### INSTRUCTIONS

#### Line No.

- Beginning Cash Balance This amount must agree with the Ending Cash Balance (Line 11) from the last finance report filed
- 2 Itemized Contribution-List all contributions of \$100 or more (Schedule A, Page 3)
- Transfer/Event Proceeds- List all transfers from other committees and proceeds from fund raising events (Schedule C, Page 4)
- 5. Unitemized Contributions-Total of Contribution under \$100.
- o. Total Cash Receipts-Line 2 + 3 + 4 + 5.
- 7. Total Cash Available-Line 1 + 6.
- 10. Total Cash Disbursements Line 8 + 9.
- 11. Ending Cash Balance-Line 7 10. This amount must equal Line 13
- 12. Total Value of In-Kind Contributions-Total of Schedule F. Page 5.
- 14. Other Assets-Do not list office furniture and equipment.
- 16. Accounts and Loans Payable-Total Schedule G, Page 6.
- 17 Balance-Subtract Line 16 from Line 15.

#### SCHEDULE A

#### ITEMIZED CONTRIBUTIONS

List the name, residence address and principal place of employment of any person who contributed \$100, or more and the amount contributed by that person during the reporting period and aggregate year to date.

PRINCIPAL PLACE OF EMPLOYMENT	AMOUNT OF CO This Period	ONTRIBUTION Aggregate year to date
Own Laundry Chain	100.00	100,00
	Own Laundry Chain	PRINCIPAL PLACE OF EMPLOYMENT Period  Own Laundry Chain 100.00

200	100	
Page	of	_

TOTAL THIS PERIOD S \_\_\_\_\_\_ (Last page only)

Transfer total to Summary Page - Line 2

0 1 6 1 6 1 6 1 6 0 0

· Schedule D	Expenses	
Payer	Purpose	amount
Index	Bookkeeping Supplies	11.89
Hurold's Printing	Printing	18.72
White Postmaster	Bulk Mailing Dermit + Post	ege 143.50
// //	Postage	15.00
First Nat'l Bank	Check Printing	9.90
White Post muster	Postage	250.00
Index	Office Supplies	14.19
Reynold's Printin		5.42
Hipple Printing		38,63
Hipple Printing may Johnson Boyles Fisher, D.C.	Lawyer Services	10.64
South Oab. Right to L		78.00
White Postmas		. 15.00
Karen Prochnick	S.ARL. advertising	30.00
Harold's Printin	ng Printing	74.93
Insty Prints	ng Printing	4825
White Posting.	tu Protogo	10000

Cheek No.

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10-23-78

ر 25-78 يا 10

10 -23-18

10027-78

16-30-78

#864.07

#### SCHEDULE B LOAN PROCEEDS

List name and address of the Bank, name and address of the cosigner and/or guarantors of the note and the amount of the loan.

DATE	NAME AND ADDRESS OF BANK AND COSIGNERS/GUARANTORS	AMOUNT

Transfer Total to Summary Page - Line 3

#### SCHEDULE C TRANSFERS EVENT PROCEEDS

List the source and amount of transfers from other committees and/or accounts, and the total proceeds from fund raising events including the date, location and type of event.

DATE	SOURCE OR LOCATION AND TYPE OF EVENT	AMOUNT
-10-78/8-19-78	Sale of Ruffle tickets	326.09
		* 1
Land Street		1

Transfer Total to Summary Page 1 no 4

#### SCHEDULE D EXPENSES

List the amount, purpose, date and check number of all expenditures and the name of each payer.

DATE	CHECK NO.	PAYEE	PURPOSE	AMOUNT
		Sheet attached		
			1	

Page \_\_\_\_\_of \_\_\_\_

7 Trpsfc Total to Summary Page - Line 8

## SCHEDULE E PAYMENT ON LOANS DURING THIS PERIOD

List the date, check number and names of the payees and the amounts of the oan repayments during this reporting period.

DATE CHECK NO.			PAYEE AND ADDRESS	AMOUNT
1			¥.	
- 1		9	Α.	
- 1				

T-ansfer Total to Summary Page -- Line 9

TOTAL \$\_\_\_\_\_\_(Last Page Only)

#### SCHEDULE F IN-KIND CONTRIBUTIONS

List the information as to the nature of the good or services provided, the name and address of the persons who provided them, and the fair market values if \$100 or more.

)	NAME AND ADDRESS	NATURE OF GOODS/SERVICES	VALUE
Seett	Reardon, 320 E. 27th, Sieux Falls, S. B 57105	Paid advertising	540.43
Ē.,			

Page \_\_\_\_ of \_\_\_

Transfer Total to Summary Page - Line 12

Total This Period 5 5 40.43 (Last Page Only)

20616.01000

#### SCHEDULE G

#### ACCOUNTS AND LOANS PAYABLE

List information as to the names and addresses of the creditors, date in which loan anc/or debt incurred, the amount of the original loan and/or debt, cumulative payment to date and outstanding and/or principal balances owed.

DATE INCURRED	NAME AND ADDRESS	AMOUNT OF ORIGINAL LOAN	CLMULATIVE PRINCIPAL PAYMENT TO DATE	OUTSTANDING BALANCE AT CLOSE OF THIS PERIOD
•.				
			(90)	
•				
	in the second se			
		11		

Page\_\_\_\_ of\_\_\_\_

Transfer Total to Summary Page - Line 16

Total This Period S\_\_\_\_\_\_(Last Page Only)

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



(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

7		-	
Page	01	_3_	for
Line Number	_		

(Use Separate Schedules for

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date Imonth,	Amount of each exp
MCP Inc.	gestage alvance	day, year) -	ture this period
800 Engoworth Mie.	fordenising .	10.19.78	3,000 :0
opital Heights, MD	Expenditure for:		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month.	Amount of each exp
MICP INC.	goslage advance	day, year)	ture this period
fis Edgeworth Ave		10.23.21	40000
apital Heights MD.	Expenditure for:    Primary   General   Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date Impnin.	Amount of each ext
er Hurich	degrait Fin ho Dente	10 - 23 - 25	ture this period
ES. PESSES, NE	Talley Walk	10 -3 10	200 00
Someon of State	Expenditure for:    Primary   General   Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date Imonth,	Amount of each ca:
VZZC Inc.	effice rout	tiay, yeari	ture this period
29-14th 5t. NW +341	In a war broken and	10 33 75	1,746
-itight, D.C.	Expenditure for General DOther	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	, . 70
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date Imonth,	Amount of each ex
WARRANT MY	ANGEN ANDERSON	10/221-7	100
v 0	Expenditure for:    Primary   General   Dither	1/4/2019	
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure		Amount of each ex
from 18 Downey	12 Ch Solver to Morney	day, year)	ture this period
175 Hounta' St.	Bank Tomb Jepsin	15 14.52	256
Parco, N. E 89431	Expenditure for:  Different Disher	1	**
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date Imonto,	Amount of each er
	R 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	day, year)	ture this perio
	Expenditure for.  O Primary   General   D Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	. Date imonth.	Amount of each ex
	0 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Cay, year?	tule this perio
· ·	Expenditure for:		* 4
SUBTOTAL of expenditures this page (optional)		1	\$ 5346. \$ 19984.

## Your vote in the Primary is CRUCIAL!

Your vote in the Primary Election on Tuesday, June 6th, will have the impact of 10 VOTES or more since it is expected that less than 10% of the eligible voters will go to the polls. Don't pass up this unique chance you have to speak out loud and clear for PRO-LIFE—VOTE JUNE6TH!

THIS LITTLE GUY WANTS

Pro-Life Action Council P.O. Box 7149, Grand Station Des Moiries, Iowa 50309

BULK RATE U.S. POSTAGE PAID Permit No. 1343 Des Moines, Iowa

TO VOTE IN THE JUNE 6TH PRIMARY

# Vote for the unborn in the June 6th Primary!

The unborn cannot speak for themselves but you can speak for them-with your ballot in the June 6th Primary. Your vote will help to elect candidates who will stand up and defend the most basic of all human rights—the Right To Life! If you will vote on June 6th and also urge two or three of your prolife friends or relatives to vote, the election of pro-life candidates will be assured!

## THE CANDIDATES

#### **IDWA LIEUTENANT GOVERNOR PEMOCRATIC PRIMARY**

#### BILL PALMER

Semocrats make sure you vote for Bill Palmer! As Chairman of the Senate Budget Committee. Palmer successfully fought to restrict abortions hald with your tax dollars.



#### REPUBLICAN PRIMARY

#### TERRY BRANDSTAD

Republicans ... make sure you util the lever for Terry Brandstad! Brandstad is one of the strongest Right-To-Life advocates in the lowa Legislature and supports a Pro-Life constitutional amendment.



legislation.

BRICE SARLEY has actively

#### Independent Votorsi

If you are a requirement in any non-voted volume can call vote in the Primar, in this work was a respect to a declaration card at the Police of the your view You are y their re-declare as an tatioperature il you choose

#### U.S. SENATE\* REPUBLICAN PRIMARY

#### ROGER JEPSEN

Supports a Pro-Life Constitutional Amendment ... opposes the use of tax money to pay for abortions.

#### MAURICE VAN NOSTRAND

Opposes a Pro-Life Constitutional Amendment ... supports the use of tax money to pay for abortions.

#### JOSEPH BERTROCHE

Opposes a Pro-Life Constitutional Amendment ... opprises the use of tax money to pay for abortions.

\*The Pro-Life Action Council is a state political action commiltee and council legally participate in the endorsement of candidates for Federal office. We have, however, attempted to provide you with those candidates' positions on certain pro-life issues.

#### CLIP AND MAIL IN

Enclosed is my contribution to help defray the costs of printing and mailing (donations are tax deductible).

\$25 or more \_\_\_ \$10\_\_ \$5\_\_\_ Other\_ would like to become active in the Pro-Life Movement.

City State

Pro-Life Action Council

P.C. This 7140 Crand Station

Fr allowers, forma choos

### Your vote in the General Election is

## crucial

YOUR VOTE IN THE GENERAL ELECTION ON TUESDAY, NOVEMBER 7 WILL HAVE THE IMPACT OF SEVERAL VOTES SINCE IT IS EXPECTED THAT LESS THAN HALF OF THE ELIGIBLE VOTERS WILL GO TO THE POLLS. DON'T PASS UP THIS UNIQUE CHANCE YOU HAVE TO SPEAK OUT FOR THOSE WHO CANNOT SPEAK FOR THEMSELVES. VOTE NOVEMBER 7.

Paid for by Arizonans for Life
Keten H. Mark, Chaltman
1017 N. 3rd Street
Phoenix, Arizona 85004



ARIZONANS FOR LIFE 1017 N. 3rd Street Phoenix, Arizona 85004

THIS LITTLE
GUY WANTS
YOU
TO VOTE
IN THE
NOV. 7
ELECTION

BULK RATE
U. S. Postage
PAID
PHOENIX, ARIZONA
Permit No. 269

## -vote for the unborn in the nov. 7 election

Unborn children cannot speak for themselves but you can speak for them with your ballot in the Tuesday. So November 7, General Election. Your vote can guarantee that the candidates elected to office will be the people who will stand up and defend the most basic of all human rights — THE RIGHT TO LIFE.

If the candidates listed below win the election, then the unborn and defenseless will win.

HUMAN LIFE IS ENDANGERED!!! Did you know that:

- On January 22, 1973 the U. S. Supreme Court legalized defacto abortion-on-demand to the day of the baby's birth?
- On July 1, 1976 the Court ruled that a girl of 12 may obtain an abortion without her parent's
  advice or consent, and that a woman can obtain an abortion without the knowledge or consent
  of her husband striking at the very heart of the family unit?

THE ELECTION OF THESE PRO-LIFE CANDIDATES WILL HELP ASSURE THE SUCCESS OF OUR GOAL TO RESTORE LEGAL PROTECTION TO THE UNBORN AND DEFENSELESS BY PERMITTING ABORTION ONLY TO PREVENT THE DEATH OF THE MOTHER. YOU ARE URGED TO TAKE 5 PRO-LIFE FRIENDS WITH YOU TO THE POLLS.

Take this brochure with you to the polls

and vote ONLY for the candidates recommended below.

Governor — Evan Mecham
Secretary of State — Rose Mofford or Henry Haws
Attorney General — Bob Curbin
State Superintendent of Public Instruction — Steve Jenkins
Congressional District 1 — John Rhodes
Congressional District 2 — Tom Richey
Congressional District 3 — — — —
Congressional District 4 — Eldon Rudd

Legislative Districts	Senate	House
District 15	S. H. "Hal" Runyan	James B. Ratliff
District 16	Dr. Wayne Stump	Bob Hungerford
District 17	Anne Lindeman	Wilbert Davis
District 18		Burton Barr, Pete Dunn
District 19	per and also see our for the	Tony West
District 20	George Hussey	Debbie McCune, Lillian Jordan
District 21		Robert Griffin, Don Kenney
District 22	Manuel Pena, Jr	
District 23		Tony R. Abril, Sr
District 24		Pete Corpstein, David Gorman
District 25	Trudy Camping	D. Lee Jones
District 26		Mary C. Hegarty, Frank Kelley
District 27		
District 28		Tony Raineri, Jim Skelly
District 29	Jack Taylor	Donna Carlsen, Jim Cooper -
District 30	Stan Turley-	Carl J. Kunasek, James J. Sossamar







THE ELECTION OF A PRO-LIFE GOVERNOR WILL BE ASSURED IF YOU WILL VOTE IN THE ELECTION, TUESDAY, NOVEMBER 7 AND ALSO URGE TWO OR THREE OF YOUR PRO-LIFE FRIENDS AND RELATIVES TO VOTE.

## FOR GOVERNOR



S

0

#### JAMES RHODES



#### RICHARD CELESTE

- James Rhodes will actively support and work for the Human Life Amendment to end abortion and protect human life.
- James Rhodes will oppose the use of your tax dollars to pay for abortions.
- James Rhodes will "strongly support other pro-life legislation."
- \* Celeste will not support the Human Life Amendment. He insists that it be encumbered with other non-related issues, thus effectively destroying any chance of its passage.
- Celeste will not oppose the use of your tax money for abortion.
- Celeste—although "personally opposed" to abortion, his public position is one of paying for abortions and allowing them to continue.

Other Pro Life State Candidates include:

George Voinovich (R) and Michael Dorrian (D) for Lieutenant Governor Ted Brown (R) and Tony Celebrezzo (D) for Secretary of State Thomas Ferguson (D) and Donald Lukens (R) for Auditor of State William Brown (D) and George Smith (R) for Attorney General

**DEMOCRATS AND INDEPENDENTS** ... YOU TOO SHOULD PARTICIPATE IN THIS YEAR'S MAJOR ELECTION CONTEST BY VOTING IN THE ELECTION NOVEMBER 7. AFTER VOTING FOR GOVERNOR, WE HOPE YOU WILL THEN VOTE FOR OTHER PRO-LIFE CANDIDATES REGARDLESS OF PARTY.

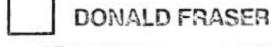
MORTE JAMES RHODES

THE ELECTION OF A PRO-LIFE SENATOR WILL BE ASSURED IF YOU WILL VOTE IN THE DFI. PRIMARY, TUESDAY, SEPT. 12 AND ALSO URGE TWO OR THREE OF YOUR PRO-LIFE FRIENDS AND RELATIVES TO VOTE.

## THE CANDIDATES



### **BOB SHORT**



- ☆Bob Short will actively support and work for a Human Life Amendment to end abortion and protect human life.
- 常Bob Short will oppose the use of tax dollars to pay for abortions.
- Bob Short will oppose the use of tax dollars to fund "research" where living babies that survive abortion are used as experimental subjects.
- Fraser supports the current abortion on demand policy. As a Minneapulis Congressman he worked and tostified against the Human Life Amandment.
- Fraser has always voted to use tax dellars to pay for abortions.
- Fraser voted against forhidding the use of tax dollars for "research" where living babies that survive abortion are used as experimental subjects.

WHO FUNDS FRASER? The largest for profit abortion clinic in Minnesota used its newsletter to raise funds for the Fraser campaign. The incorporator of the Circle and his wide in paratite Fraser campaign \$1,000. A major Washington based pro-abortion lobby group, the Net-onal Abortion Rights Action League, give the Fraser campaign \$3,500.

REPUBLICANS AND INDEPENDENTS... YOU TOO SHOULD PARTICIPATE IN THIS YEAR SMAJOR PRIMARY ELECTION CONTEST BY VOTING IN THE DEL PRIMARY SEPTEMBER 12. YOU DO NOT HAVE TO DECLARS ANY PARTY AFFILIATION BEFORE ENTERING THE VOTING BOOTH, REMEMBER TO VOTE ONLY ON THE DEL SIDS OF THE BALLOT (OR IT WILL NOT BE COUNTED AT ALL). THIS DOES NOT OBLIGATE YOU IN THE NOVEMBER GENERAL ELECTION. YOU MAY THEN VOTE FOR ANY CANDIDATE OR PARTY YOU WISH.

WOTE BOB SHORT

## CRUCIAL!



LO

Paid for by the Democrata, Republicans and Independents United for a Pro-tile Senate, Kistine Kremer, Chairman, P.O. Box 19023 Diamond Lake Station Mpts., Minn, 55419



Democrats, Republicans and Independents United for a Pro-life Senate P.O. Box 19029 Dramond Lake Station Mpls., Minn. 55410

#### LIFE AMENDMENT POLITICAL ACTION COMMITTEE

February 21, 1979

Mrs. Jeanne Pertel 1560 Kanunu St Honolulu, Hawaii 96814

#### BOARD OF DIRECTORS

Sean Morton Downey, Jr.
Chairman
Felicia Goeken
Secretary
Paul A. Brown
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Jean Boyle
Carolum Gerster, M.D.
Robert L. Sassone, Esq.
J. C. Willke, M.v.

ELECTION DAY 1978 INCREASED OUR NUMBER OF PRO-LIFE SENATORS FROM 36 TO 43. IN THE HOUSE OUR PRO-LIFE GAIN AMOUNTED TO ABOUT 30. TRULY OUTSTANDING!

Dear Mrs. Fertel:

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We all know that regardless of legalistic word-play and whimsical fast-juggling, abortion is murder -- killing a human being.

To kill a human being is wrong!

To kill a child is wrong!

To kill a baby is wrong!

To kill a baby in its mother's womb is wrong!

We are writing to you today for two reasons: 1) to report our remarkable pro-life election successes in 1978, and 2) to ask you to join us in producing even greater election successes in 1979 and 1980 -- especially in special elections this year.

Election Day 1978 increased our number of pro-life Senators from 36 to 43. In the House, our pro-life gain amounted to about 30. A significant accomplishment!

National media made great news out of the pro-life victories in Minnesota, North Carolina, Ohio, South Dakota, Iowa, New Hampshire, and several other targeted states.

Let's face it -- one reason a lot of people don't like to talk about or even think about abortion is that often the details are almost too ghastly to repeat. Remember the sensational trial in California last year? (See enclosed clipping.)

According to the prosecution and a medical doctor who witnessed the incident, a prominent obstetrician manually choked to death a baby girl approximately an hour after she had been born alive, some 12 hours following the injection of saline to kill the baby in her mother's uterus. Despite horrors such as this, on January 9, 1979, the Supreme Court struck down a Pennsylvania law which would have made abortionists subject to criminal prosecution under certain circumstances. It is clear that only an amendment to the Constitution will guarantee the legal protection of life to babies living in their mothers' wombs. That Human Life Amendment to our Constitution is the single goal of the Life Amendment Political Action Committee. We must elect U.S. Senators and Congressmen who will support a Human Life Amendment. All of the financial support given to the various campaigns by the Life Amendment Political Action Committee, as well as grants to candidates, came from the generous donations received from loyal supporters like you.

Based on our great pro-life successes of 1978, now is the time to make our big move. In 1979 and 1980 we can achieve the two-thirds majority needed in the Senate and House to release our Human Life Amendment from the stalling tactics of subcommittees.

Here is how we plan to do it.

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LAPAC has already targeted for defeat the following anti-Life Amendment Senators: Birch Bayh, Indiana; Bob Packwood, Oregon: Patrick Leahy, Vermont; George McGovern, South Dakota; John Culver, Iowa; and Prank Church, Idaho.

With your help, LAPAC can defeat these first six "senseless assassins of unborn children" and expand the anti-Life Amendment target list. You can help directly to gain the necessary two-thirds majority of pro-life votes on Capitol Hill.

Pirst, take a few moments to complete the questionnaire enclosed, indicating your personal preference about the Human Life Amendments in Congressional subcommittees now.

Then return your completed questionnaire and the most generous check you can afford -- \$200, \$100, \$50, \$25 or even \$15 -- to LAPAC.

Your contribution will be used specifically to elect prolife Senators and Congressmen in 1979 and 1980, to prepare for special elections in Wisconsin and California, to send out more questionnaires, and to let candidates know they'll have our financial support.

Frankly, we are too close to winning the necessary twothirds majority now to give up the battle to the anti-life abortionists.

Please send your generous pro-life check with your completed questionnaire in the special reply envelope enclosed for your convenience. We hope you can afford to send at least \$100, but even \$15 will be a great boost to the campaign and candidate support by LAPAC.

Sincerely,

Sean Morton Downey, Jr. Chairman, LAPAC, Inc.

Paul A. Brown Director, LAPAC, Inc.

P.S. As a result of LAPAC's exposure to millions of Americans on the NBC "Weekend" program of January 21, 1979, many positive things have already happened for LAPAC. We can keep the momentum going and take full advantage of the national publicity we received if we can count on your financial support. Please mail your check today.



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## ILULRAL ELECTION COMMISSION

105 K STRILL N.W. WISHINGTON, D.C. 20461

THIS IS THE BEGINNING OF MUR # 960

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#### FEDERAL ELECTION COMMISSION

1325 K STREET N.W WASHINGTON, D.C., 2046 F

THE FOLLOWING MATERIAL IS BEING ADDED TO THE PUBLIC FILE OF CLOSED MUR 960.



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RECEIVED

D. PAUL ALAGIA, JR. WILLIAM A. CAREY **RUDY YESSIN'"** MICHAEL E. LANNON" ST. JOHN BARRETT RICHARD A. GLADSTONE CHARLES DAWSON BARNETT' GREGORY B. DICKENSON DARRYL W. DURHAM WM. CARL FUST' JOSEPH L. HAMILTON' JOHN S. KECK JOHN B LYNN HUGH MACMILLAN, JR ... IVAN H. RICH, JR. JACK E. RUCK MARY JO WINKLER

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1627 K STREET, N.W. WASHINGTON .: D. C. 20006 9

CABLE ALL OFFICES ALBAR

BARNETT & ALAGIA" HENTUCKY HOME LIFE BUILDING

LOUISVILLE. KENTUCKY 40201 -5021 585-4131

BARNETT, ALAGIA & PROSPERI" PALM BEACH, FLORIDA 33480 305 #32 5696

BARNETT, ALAGIA & YESSIN'" P.O. DRAWER B FRANKFORT, KENTUCKY 40601 (502) 227-1326

June 10, 1980

BERNARD H. BARNET! MARION EDWYN HARRISON RICHARD M. TRAUTWEIN' JOSEPH M. DAY A. PAUL PROSPERI" JAMES L. COORSSEN" PATRICIA C. ANDERSON STEVEN G. BOLTON" FRANKLIN DRAKE JOHN E. EVANS" RONALD L. GAFFNEY" WILLIAM S. GLADING JOHN M. HIMMELBERG W. DAVID KISER MARY CHERYL MATHEIS DONALD F. MINTMIRE JEFFREY 3. RITTER

OF COUNSEL RUFUS E. WILSON

208383

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

Life Amendment Political Action Committee, Inc. Re: MUR #960

Dear Mr. Steele:

Thank you for your letter of May 23, received May 27.

With respect to the second paragraph thereof and the matter of confidentiality, we invite your attention to our letter of August 1, 1979 and more particularly to the last paragraph thereof, which reads in full:

> "Our client waives confidentiality and requests that the full proceedings in MUR #960 be spread upon the public record. 2 USC §437g(a)(3)(B)."

Our client waives confidentiality, because, as explained in that letter and elsewhere, our client is the victim of continuing, if unsuccessful, harassment attempts

Charles N. Steele, Esquire June 10, 1980 Page two

by National Abortion Rights Action League. As a protection, and in the interests of full disclosure, our client wants all files pertaining to these harassing complaints available to the public.

Accordingly, our client in writing has waived, and waives, confidentiality and requests that the full proceedings in MUR #960 be spread upon the public record.

Sincerely

MARION EDWYN HARRISON

MEH:kg cc Ms. Carolyn Weeder

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. . . .

1627 K STREET, NW

WASHINGTON, D.C. 20006



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

1627 K STREET, N.W.

WASHINGTON, D.C. 20006

(202) 785-5572

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200 ROYAL PALW MAY

PALW BEACH, FLORIDA 33480

1304 432 5694

BARNETT, ALAGIA & YESSIN""

F 0. DRAWER B

FRANKFORT, KENTUCKY 40681
1562; 221 7324

June 10, 1980

BERNARD M. BARNETT
MARION EDWYN HARRISON
RICHARD M. TRAUTWEIN'
JOSEPH M. DAY'
A. PAUL PROSPERI'
JAMES L. COORSSEN'
PATRICIA C. ANDERSON
STEVEN G. BOLTON''
FRANKLIN DRAKE'
JOHN E. EVANS'
RONALD L. GAFFNEY'
WILLIAM S. GLADING
JOHN MD HIMMELBERG
W. DAYJD KISER'
MARY CITERYL MATHEIS
DONALD J. MINTMINE
JEFFRE® B. RITTER'

AUFUS E. WILSON

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

2085?

Re: Life Amendment Political Action Committee, Inc. MUR #960

Dear Mr. Steele:

D. PAUL ALAGIA, JR.

WILLIAM A. CAREY

MICHAEL E. LANNON' ST. JOHN BARRETT

DARRYL W. DURHAM

GARY D. GARRISON"
JOSEPH L. HAMILTON"
JOHN S. KECK"
JOHN B. LYNN

HUGH MACMILLAN, JR."

JOHN F. SHERLOCK III

WM. CARL FUST"

JACK E RUCK"

C

C,

MARY JO WINKLER

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Charles N. Steele, Esquire June 10, 1980 Page two

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Accordingly, our client in writing has waived, and waives, confidentiality and requests that the full proceedings in MUR #960 be spread upon the public record.

Sincerely

MARION EDWYN HARRISON

MEH:kg

cc Ms. Carolyn Weeder

1627 K STREET, N.W.

WASHINGTON, D.C 20006



THE LAACH-SINEE 1809 IT WASN'T EASY THEN IT ISN'T EASY NOW

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

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#### FEDERAL ELECTION COMMISSION

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END OF ADDITIONAL MATERIAL FOR CLOSED MUR 160



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