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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 15, 1980

MEMORANDUM

TO: FRED EILAND
PRESS OFFICE

THROUGH: BOB COSTA *R/C*

FROM: RICK HALTER

SUBJECT: PUBLIC ISSUANCE OF FINAL (POST-PRIMARY)
AUDIT REPORT - BROWN FOR PRESIDENT COMMITTEE

Attached please find a copy of the final (Post-Primary) audit report of the Brown For President Committee which was approved by the Commission on November 18, 1980.

All informational copies of the above mentioned report have been received by all parties involved and this report may be released to the public today, December 15, 1980.

Attachment as stated

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

REPORT OF THE AUDIT DIVISION
ON
BROWN FOR PRESIDENT

I. Background

A. Overview

This audit report is based on an audit of Brown for President ("the Committee"), to determine whether there has been compliance with the provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The audit was conducted pursuant to Section 9038(a) of Title 26 of the United States Code which states, in part, that after each matching payment period, the Commission shall conduct a thorough examination and audit of the qualified campaign expenses of every candidate and his authorized committees who received payments under Section 9037.

In addition, Section 9039(b) of Title 26 of the United States Code and Section 9038.1(b) of Title 11 of the Code of Federal Regulations state, in relevant part, that the Commission may conduct other examinations and audits from time to time as it deems necessary.

The Committee registered with the Federal Election Commission on July 30, 1979 as the principal campaign committee of the Honorable Edmund G. Brown, Jr. The Committee maintains its headquarters in Los Angeles, California.

The audit covered the period from July 25, 1979, the inception date of the Committee, through April 30, 1980, the final coverage date of the latest report filed at the time of the audit. The Committee reported a beginning cash balance on July 25, 1979 of \$-0-, total receipts for the period of \$2,789,307.03, total expenditures for the period of \$2,709,933.08, and a closing cash balance on April 30, 1980 of \$79,373.95. ^{1/}

^{1/} In addition, a review was performed of the Committee's financial activity through August 31, 1980 to verify the Committee's Net Outstanding Campaign Obligations as of August 31, 1980.

This audit report is based on documents and working papers which support each of the factual statements. They form part of the record upon which the Commission based its decisions on the matters in the report and were available to Commissioners and appropriate staff for review.

B. Key Personnel

The principal officers of the Committee during the period covered by the audit were Mr. Thomas Quinn, Chairman for the period July 25, 1979 through March 10, 1980, Mr. Harvey Furgatch, Chairman for the period March 10, 1980 through April 30, 1980, and Ms. Jodie Krajewski, Treasurer.

C. Scope

The audit included such tests as verification of total reported receipts and expenditures and individual transactions; review of required supporting documentation and analysis of Committee debts and obligations; review of contribution and expenditure limitations and such other audit procedures as deemed necessary under the circumstances.

II. Findings Related to Title 2 of the United States Code

On September 9, 1980, the interim post primary audit report was received by the Committee for response within 30 days of receipt. References within this report to corrective action taken by the Committee relate only to materials and information submitted by the Committee within the 30 day response period which ended on October 9, 1980, except for a corrected amended report filed by the Committee on October 14, 1980.

A. Advances To Field Persons

Section 434(b)(1) and (4) (formerly 434(b)(11))* of Title 2, United States Code requires that each report under this section shall disclose the amount of cash on hand at the beginning of the reporting period; and the total sum of disbursements made by such committee during the reporting period.

Also, Section 434(b)(5) (formerly 434(b)(9))* of Title 2, United States Code states in relevant part that each report under this section shall disclose the name and address of each person to whom an expenditure in excess of \$200 is made, together with the date, amount and purpose of such expenditure.

* The term "formerly" refers to a section of the Act in effect prior to January 8, 1980, the effective date the 1979 Amendments.

During the course of the audit, the Audit staff determined that the Committee was not adequately disclosing advances to individuals for travel and incidental expenses on its reports of receipts and expenditures filed with the Commission. Specifically, when the Committee made an advance of funds to an individual, the transaction was treated as a non-reportable expenditure and viewed as an intra-committee transfer of funds. When the Committee received an expense voucher from the individual showing how the funds advanced were expended, the expenditures made from the advance were disclosed on Schedule B-P as itemized expenditures. Prior to the receipt of an expense voucher, the funds advanced were considered as cash on hand regardless of the amount of time which had elapsed. It is the opinion of the Audit staff that the Committee had no control over the length of time it took an individual to submit an expense voucher. Therefore, a majority of the advances were considered as cash-on-hand at the end of the reporting period, although funds were, in fact, expended from the advance during the reporting period.

According to both the Treasurer and Assistant Treasurer, this method is in accordance with the instructions for the reporting of advances which appear on the reverse side of FEC Schedule G-P (Liquidation of Advances - Optional). The instructions do state that the portion of the advance which remains unexpended at the close of the reporting period is included in the Committee's cash-on-hand. However, the instructions imply and the guidance included in the Financial Control and Compliance Manual for Presidential Candidates Receiving Public Financing (Primary Election Financing) expressly states that the individual would forward at the close of each reporting period an accounting of all expenditures and the ending cash figure for incorporation into the disclosure report in the same manner as with the Committee's (expenditures from) headquarter accounts. As a result of this time lag, total expenditure and cash-on-hand figures for each reporting period were significantly misstated until April 30, 1980.

In addition to the problem involving the failure to report expenditures from advances in a timely manner discussed above, an additional matter was noted during our review of the Committee's advance activity.

The Audit staff determined that advances to 28 individuals totaling \$16,290.48, were reclassified as consulting fees and reported as such in the Committee's disclosure report for the month of April, 1980. These advances had been made one to seven months prior to their disclosure as consulting fees.

The Committee's Assistant Treasurer explained that he had been unable to obtain an accounting of how these advances had been spent and therefore reclassified them as consulting fees in order to reflect the expenditures in the disclosure reports.

On September 3, 1980, the Commission made a preliminary determination that the Committee be required to file amended reports to correct this matter. On October 8, 1980, the Committee filed an amended report with the Commission. The Audit staff reviewed this amendment during fieldwork conducted in October of 1980 and suggested that the Committee file an amendment to supercede the October 8, 1980 amendment which was lacking in several respects (i.e., dates were omitted and explanations for the changes in the purpose of most of the expenditures were also omitted). This amended report was filed on October 14, 1980 and contained the required information.

Of the 28 expenditures reclassified from advances to consulting fees, the October 14 amended report disclosed the actual use of the funds relating to 25 expenditures totalling \$16,360.48. The remaining three (3) expenditures totalling \$1,930.00 were initially classified correctly as consulting fees.

Recommendation

The Audit staff recommends no further action since the amended report adequately clarified the public record.

B. The Use of Real and Personal Property and Certain Other Costs for Fundraising

During the period audited for the initial phase of the fieldwork, Section 100.4(b)(4) of Title 11, Code of Federal Regulations, in part, stated that the term "contribution" does not include the use of real or personal property and the cost of invitations, food, and beverages, voluntarily provided without charge by an individual to a candidate on the individual's residential premises, to the extent that the cumulative value of those activities by the individual on behalf of the candidate do not exceed \$500 with respect to an election.

During the course of the initial phase of the fieldwork, the Audit staff reviewed the fundraising activities of the Committee. The Committee disclosed, on Schedule D-P, 24 fundraising events (e.g., dinners, receptions, etc.) which were held at the residences of individuals. To document that the cost of each event was less than \$500 per individual per event, the Committee requested that the individual sign a statement to that effect.

This statement had a provision that as a married couple, the cost of the fundraising event did not exceed \$1,000. The Committee retained this documentation from all but eight (8) individuals.

In accordance with our request, letters were sent to the individuals. The Committee obtained statements from six (6) of the eight (8) individuals which were reviewed by the Audit staff.

On September 3, 1980, the Commission approved the recommendation that no further action be taken on this matter.

III. Findings Relating to Title 26 of the United States Code

A. Determination of Net Outstanding Campaign Obligations

Section 9034.5(b) of Title 11 of the Code of Federal Regulations requires a candidate to submit a statement of net outstanding campaign obligations within 15 days of the candidate's date of ineligibility. The term net outstanding campaign obligations is explained in Section 9034.5(a) of Title 11 of the Code of Federal Regulations.

Section 9038(b)(1) of Title 26 of the United States Code states that if the Commission determines that any portion of the payments made to a candidate from the matching payment account was in excess of the aggregate of payments to which such candidate was entitled under Section 9034, it shall notify the candidate, and the candidate shall pay to the Secretary an amount equal to the amount of excess payments.

Section 9034.1(a) of Title 11 of the Code of Federal Regulations states, in part, that a candidate who has become ineligible under 11 C.F.R. 9033.5 may not receive further matching payments regardless of the date of deposit of the underlying contributions if he has no net outstanding campaign obligations as defined in 11 C.F.R. 9034.5.

On April 19, 1980, the Committee filed a Statement of Net Outstanding Campaign Obligations ("NOCO") which disclosed its obligations as of April 3, 1980. ^{1/} On September 3, 1980, the Commission approved the Audit staff's estimate that the Committee's net outstanding campaign obligations as of April 3, 1980 totalled \$442,506.31 (deficit), while noting that there were several categories of unverified debts on the Committee's NOCO statement. As a result of the work performed after the 30 day response period to the interim audit report, the Audit staff estimated that the Committee's net outstanding campaign obligations as of April 3, 1980 were as follows:

^{1/} The date of April 3, 1980 is the date determined by the Commission to be the date of ineligibility for purposes of incurring qualified campaign expenses.

STATEMENT OF NET OUTSTANDING CAMPAIGN OBLIGATIONS

Assets

Cash-on-Hand (April 3, 1980)	\$ 64,265.35	
Accounts Receivable	<u>13,561.14</u>	
Total Assets	\$ <u>77,826.49</u>	\$ <u>77,826.49</u>

Liabilities

Qualified Campaign Expenses paid through 10/6/80 (including qualified campaign expenses incurred prior to 4/3/80 and actual fundraising and winding down costs paid 4/4/80-10/6/80)	(\$527,281.55) <u>2/</u>	
Debts Owed by the Committee	(3,000.00) <u>3/</u>	
Estimated Winding Down Costs (10/7/80-12/31/80 projected termination date)	<u>(8,636.70)</u>	
Total Liabilities for Campaign Expenses	<u>(\$538,209.93)</u>	<u>(\$538,209.93)</u>
Net Outstanding Campaign Obligations	<u>(\$461,091.76)</u>	<u>(\$461,091.76)</u>

2/ This amount does not include those expenditures made after date of ineligibility (April 3, 1980), which were insufficiently documented or apparently non-campaign related. These expenditures are detailed in Finding III.B. (4) and (5) of this report.

3/ The amount shown (\$3,000) is an estimate due to the fact that the Committee has not received a billing from a vendor for services during June-August 1980. The estimated amount will be compared to the actual amount billed, when available, and an adjustment will be made, as appropriate.

Therefore, based on the Committee's NOCO position on April 3, 1980, the Committee was entitled to an amount of matching funds (provided matchable contributions are submitted in accordance with Commission procedures) sufficient to reduce the Committee's obligations to zero. However, any funds from other sources (i.e., non-matching fund payments) are to be applied against the debt. The Committee's matching fund contribution activity is shown below for the purpose of illustrating the reduction of the debt.

Committee's NOCO as of 4/3/80 (deficit)		\$461,091.76
Less: Contributions and Interest Income [—]		
Received From 4/4/80 to 7/17/80	\$260,540.44	
Matching Funds Received After 4/3/80		
4/10/80	27,045.38	
4/25/80	38,752.15	
5/22/80	14,314.04	
6/05/80	43,181.24	
7/07/80	61,966.11	
7/17/80	<u>35,066.68</u>	
Total Matching Funds and Contributions		
Received 4/4/80 thru 7/17/80	<u>\$480,866.04</u>	<u>\$480,866.04</u>
Final Cash Position as of 7/17/80 - Surplus		<u>\$ 19,774.28</u>

As is depicted above, the Committee's financial position on 7/17/80 reflects surplus funds of \$19,774.28 which represents that portion of the July 17, 1980 matching funds payment over and above the amount needed to satisfy Committee obligations. This amount is then viewed as an excessive payment of matching funds which pursuant to 26 U.S.C. 9038(b)(1) is repayable in full to the U. S. Treasury.

Recommendation

Since the Committee attained a surplus financial position as of close of business July 17, 1980, a repayment of the excessive portion of July 17, 1980 matching fund payment totaling \$19,774.28 must be made in full to the U.S. Treasury within 90 days of receipt of this report. Should the Committee obtain the requisite documentation to support the expenditures, or a portion thereof, shown in Finding III.B (4) and (5), as qualified campaign expenses, the final repayment amount will be reduced accordingly, since these expenditures were not included in the estimation of NOCO as of 4/3/80.

B. Undocumented Expenditures

Section 9033.1(a)(1) of Title 11, Code of Federal Regulations sets forth the documentation necessary to determine a qualified campaign expense as a receipted bill which is from the payee and states the particulars of the expenditure; or in the absence of such receipted bill a cancelled check negotiated by the payee plus one of the following documents generated by the payee which states the particulars of the expenditure; a bill, invoice, voucher or contemporaneous memorandum. Where these documents are not available, then the Commission will accept a voucher or contemporaneous memorandum from the candidate or committee. The Commission will accept a cancelled check stating the particulars of the expenditure, or the Commission may accept a cancelled check and collateral evidence to document the qualified campaign expenses.

Section 9032.9 of Title 26, United States Code, in part, defines qualified campaign expense as a payment made on behalf of the candidate by an authorized committee in connection with his campaign for nomination for election.

Section 9038(b)(2) of Title 26, United States Code, in part, states that if the Commission determines that any amount of any payment made to a candidate from the matching payment account was used for any purpose other than to defray the qualified campaign expenses with respect to which such payment was made it shall notify such candidate of the amount so used, and the candidate shall pay to the Secretary an amount equal to such amount (also see 11 C.F.R. 9038.2(a)(2)(i)).

During the audit fieldwork conducted in May and June of 1980, the Audit staff conducted a review of disbursements to verify that all were for qualified campaign expenses. The Audit staff identified 337 disbursements totaling \$228,785.39 which were made by Committee check or wire transfer and not adequately documented as to the particulars of the expenditure or verifiable as to representing qualified campaign expenses.

On September 3, 1980, the Commission made a preliminary determination that, absent a showing to the contrary \$228,785.39 in expenditures incurred from the inception of the Committee to April 30, 1980 be viewed as unqualified campaign expenses and the value repaid in full to the U.S. Treasury. Many of these expenditures were not adequately documented due to a lack of sufficient internal control procedures for maintaining expenditure records.

In October, 1980, the Committee presented additional information regarding a portion of the insufficiently documented expenditures. As a result of our review, the value of undocumented expenditures, initially identified, was reduced from \$228,785.39 to \$52,261.46.

A breakdown by category is shown below:

- 1) consulting fees from the headquarter's account - 65 totaling \$34,448.08;
- 2) other expenditures from the headquarter's account - 13 totalling \$4,178.78; and
- 3) expenditures made from the state accounts - 35 totaling \$13,634.60.

In addition, a review of documentation for expenditures made April 4, 1980 through October 6, 1980 revealed that the information retained by the Committee was not sufficient to establish the connection of these expenditures with the Candidate's campaign for nomination, thus we could not determine whether the expenditures were, in fact, qualified campaign expenses (see 26 U.S.C. 9032(9)(A) and item (4) below). Further, during this review the Audit staff compiled a list of expenditures which, according to the documentation retained by the Committee, had no apparent connection to the campaign (see item (5) below).

- 4) expenditures made from the headquarter's account from April 4 to October 6, 1980 not adequately documented - 56 totaling \$9,512.71;
- 5) expenditures made from the headquarter's account from April 4 to October 6, 1980 for apparent non-campaign related purposes - 16 totaling \$7,264.30.

The value of the expenditures noted in item (4) and (5) totaling \$16,777.01 was excluded from the computation of the Committee's NOCO, thereby, in effect, precluding matching funds from being used to pay for these apparent non-campaign related expenses, thus no additional repayment is necessary. (See Finding III.A.). However, the expenditures noted in items (1) through (3) above, were defrayed with matching funds, and therefore the value is repayable to the U. S. Treasury pursuant to 26 U.S.C. 9038 (b)(2).

Recommended Repayment Amount - Item A (1) through (3)
\$52,261.46.

Recommendation

The Audit staff recommends that the Committee be afforded 30 days from receipt of this report to provide additional documentation. No materials will be accepted after this period at which time the final repayment to the U.S. Treasury will be determined. Further, it is our opinion that should the Committee be unable to provide the required documentation the expenditures noted in B (1) through (3) above should be viewed as non-qualified campaign expenses and the value be repaid in full to the U.S. Treasury.

C. Non-matchable Contributions Submitted
for Matching

Section 9034.3(i) of Title 11 of the Code of Federal Regulations, in part, states that contributions in the form of the purchase price paid for the admission to any activity that primarily confers private benefits in the form of entertainment to the contributor in which case the amount of the matchable contribution shall include only the excess of the amount paid for admission over the fair market value of all benefits available to the purchaser.

In December of 1979, the Committee sponsored a "train ride" from Los Angeles to San Diego. According to the Treasurer, the purpose of this train ride was primarily political discussion with the Candidate. Based on this premise, the Committee submitted the total purchase price for these tickets for matching in accordance with Section 9034.3(i)(2) of the Regulations.

However, a review of the ticket used for this event indicates that the purpose of the "train ride" was the transportation of certain individuals to a benefit concert. The charge for the train ride was \$150 per person. The Committee Treasurer was unable to provide the Audit staff with the names or the number of the contributors who took part in this event at the close of our June, 1980 fieldwork. Also, the documentation to support the expenditure for the train ride and other benefits included on this trip was not sufficient to show the number of individuals on the ride.

On September 3, 1980, the Commission made a preliminary determination that the Committee be required to submit the names of the contributors involved in this event and to provide the Audit staff with full and detailed documentation and a detailed description of the benefits provided to the contributor, including the costs of the concert tickets and the train ride within 30 days of receipt of the interim audit report.

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On October 9, 1980, the Committee provided the Audit staff with the names of the contributors involved in this event. Also, the Audit staff reviewed documentation relating to the expenditures incurred as a result of the event during fieldwork conducted in October of 1980. Based on the information provided, the Audit staff calculated that 22 contributions from individuals (apparently representing at least 51 ticket purchases of \$150 each) were submitted for matching, totalling \$7,950.00. A review of the matching fund submissions indicated that two (2) of these contributions were deemed unmatchable when originally submitted since the contributors' written instruments indicated that the contribution related to the event. To compute a repayment amount for these contributions, the value of the "train ride" contributions submitted for matching was reduced by the estimated fair market value associated with each ticket purchased (including fair market value of the train ride, bus ride, and concert). In addition, an adjustment was also made for the two (2) aforementioned contributions deemed unmatchable. The Audit staff's analysis indicated that the Committee received \$412.08 in excess of the amount to which the Committee was entitled (see 26 U.S.C. 9038(b)(1)).

In addition, the Audit staff noted two (2) contributions which were matched and later refunded to the contributor by the Committee. As a result, the Committee received \$447.45 in matching funds to which it was not entitled.

Recommended Payment Amount - Item III.C. \$ -0-. *

Recommendation

Based on the amounts listed in items A, B, and C above, the Audit staff recommends that the Committee repay \$72,035.74 to the U. S. Treasury within 90 days of receipt of this report or provide additional documentation within 30 days after receipt of this report which demonstrates that these items are not subject to repayment. A recapitulation of the components of the repayment amount appears below:

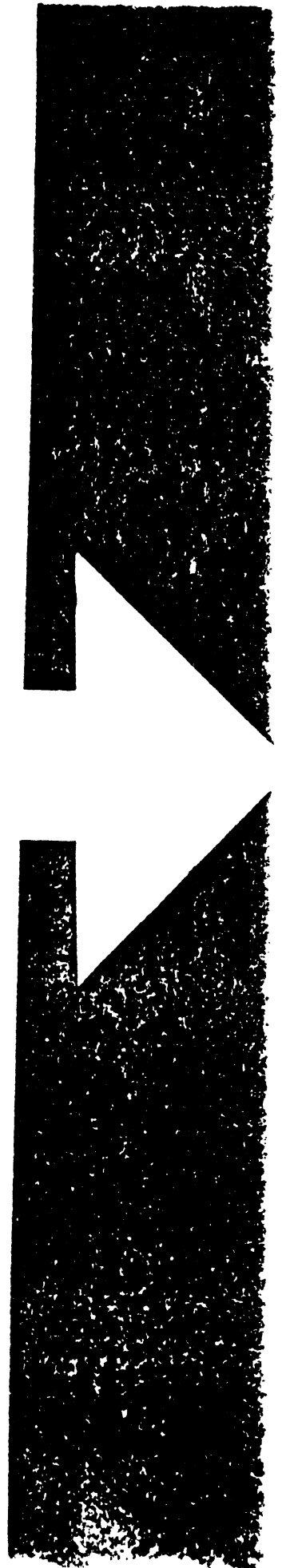
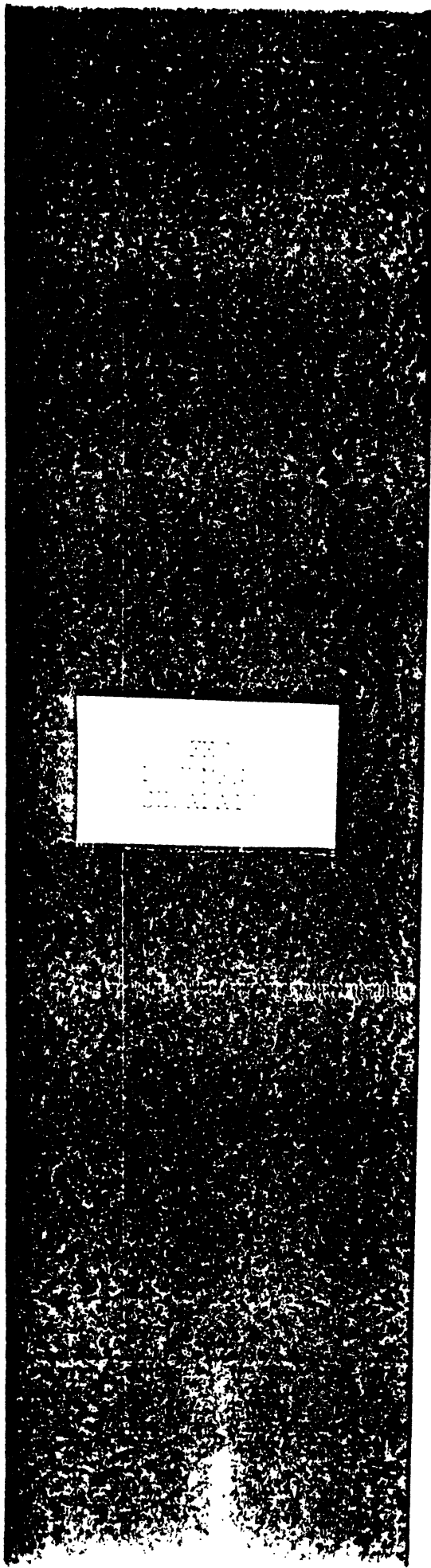
Determination of Net Outstanding Campaign Obligations - Item A	\$19,774.28
Undocumented Expenditures - Items B(1), (2) and (3)	52,261.46
Non-matchable Contributions - Item C	<u>(-0-)*</u>
 Total Recommended Repayment	 <u>\$72,035.74</u>

* This value is already included in Item A (Excessive Matching Fund Payment), therefore it is excluded here to avoid double counting.

D. Matter Referred to the Office of General Counsel

A certain matter noted during the audit was referred to the Commission's office of General Counsel for consideration on July 10, 1980.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 21, 1981

MEMORANDUM

TO: FRED EILAND
PRESS OFFICE

FROM: BOB COSTA *RC*

SUBJECT: PUBLIC ISSUANCE OF REVISED ADDENDUM
TO THE FINAL (POST-PRIMARY) AUDIT
REPORT - BROWN FOR PRESIDENT COMMITTEE

Attached please find a copy of the revised addendum to the final (Post-Primary) audit report of the Brown for President Committee which was approved by the Commission on April 7, 1981.

Informational copies of this addendum have been received by all parties involved and this addendum may be released to the public as of today, April 21, 1981.

Attachment as stated

cc: FEC Library
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Public Record

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 7, 1981

MEMORANDUM

TO: THE COMMISSIONERS

THROUGH: B. ALLEN CLUTTER, III *BA*
STAFF DIRECTOR

FROM: BOB COSTA *BC*

SUBJECT: BROWN FOR PRESIDENT - ADDENDUM
TO THE FINAL AUDIT REPORT

I. Summary of Issue and Recommendation

On January 8 and March 16, 1981, the Audit Division received from Brown for President ("the Committee") responses to the final audit report. Acceptable supporting documentation was presented which reduces the amount repayable to the U.S. Treasury from \$72,035.74 (as cited in the final audit report) to \$18,050.61. The Audit staff recommends that the Commission approve this revised repayment amount based on the discussion below. Further, it is recommended that this document be placed on the public record as an addendum to the publicly released final audit report.

II. Background

On December 9, 1980, the Committee received a copy of the final audit report. The Committee was afforded 30 days to respond to the repayment findings and conclusions contained in the final report.*

Specifically, two (2) findings contained in the report included recommendations that the Committee repay a portion of the Federal funds it received during the primary election campaign. One finding entitled "Determination of Net Outstanding Campaign Obligations" (III.A. on pages 5-7 of the final audit report), concluded that the Committee received a Matching Fund payment on July 17, 1980, a portion of which (\$19,774.28) was in excess of the amount to which the Committee was entitled.

* On March 3, 1981, the Commission voted in favor of allowing the Committee 14 additional days in which to submit documentation and/or information for expenditures cited in the final audit report as undocumented and/or non-campaign related.

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The second finding entitled "Undocumented Expenditures" (III.B. on pages 8-10 of the final audit report), stated that the Committee made expenditures, totaling \$52,261.46, for which it did not retain the requisite supporting documentation as required by 11 C.F.R. 9033.1(a)(1).

On January 8 and March 16, 1981, the Committee submitted timely responses to the final audit report which included information/documentation pertaining to the aforementioned findings.

With respect to the finding entitled "Determination of Net Outstanding Campaign Obligations" (Finding III.A.), the Committee provided the Audit staff with the following information and documentation:

1) adequate supporting documentation for expenditures made from the headquarter's account from 4/4-10/6/80 totaling \$7,358.26 (item #4 on page 9 of the final report);

2) documentation to verify that expenditures made from the headquarter's account from 4/4-10/6/80 totalling \$6,027.90 (item #5 on page 9 of the final audit report) were for qualified campaign expenses; and

3) documentation and information to verify that actual winding down costs were \$9,078.78 greater than the estimate noted in the final audit report.

Based on the above review of this information and documentation, the Audit staff concludes that the Committee was fully entitled to the final matching fund payment of \$35,066.68 received on 7/17/80, and as of that date had a remaining entitlement of \$2,690.66.

For the finding entitled "Undocumented Expenditures" (Finding III.B. on pages 8-10 of the final audit report), the Committee provided adequate supporting documentation totaling \$34,210.85. The remaining expenditures totaling \$18,050.61 are deemed as undocumented expenditures.

Therefore the amount (\$72,035.74) cited in the final audit report as repayable to the U.S. Treasury is reduced to \$18,050.61.

III. Support for the Recommendation

Based on the Audit staff's review of the supporting documentation submitted with the response to the final audit report by the Committee, it is recommended that the Commission determine that the revised amount is repayable to the U.S. Treasury not later than 20 days from the date of receipt of this report.

IV. Staff Coordination

A copy of this memorandum was furnished to OGC for consideration.



FEDERAL ELECTION COMMISSION

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

ADDITIONAL INFORMATION REGARDING THIS ORGANIZATION
MAY BE LOCATED IN A COMPLETED COMPLIANCE ACTION
FILE RELEASED BY THE COMMISSION AND MADE PUBLIC IN
THE PUBLIC RECORDS OFFICE. FOR THIS PARTICULAR
ORGANIZATION'S COMPLETED COMPLIANCE ACTION FILE
SIMPLY ASK FOR THE PRESS SUMMARY OF MUR # 1346.1338
THE PRESS SUMMARY WILL PROVIDE A BRIEF HISTORY OF
THE CASE AND A SUMMARY OF THE ACTIONS TAKEN, IF ANY.



