FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 1363

Date Filmed 11/16/83 Camera No. --- 3

Cameraman JRL

83040434771

FEDERAL ELECTION COMMISSION

1) Routing slips

2) Intra-OGC memoranda

3) Pre-brief report

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

| | | | |
|---|---|---|---|
| ____ | (1) Classified Information | ____ | (6) Personal privacy |
| ____ | (2) Internal rules and practices | ____ | (7) Investigatory files |
| ____ | (3) Exempted by other statute | ____ | (8) Banking Information |
| ____ | (4) Trade secrets and commercial or financial information | ____ | (9) Well Information (geographic or geophysical) |
| ✓ | (5) Internal Documents | | |

Signed Jonathan M. Levin

Date 10/28/83

83040347 7

FEC 9-21-77

FEDERAL ELECTION COMMISSION

1) Documents pertaining to conciliation

2) Routing slips attached to such document

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

| | | | |
|---|---|---|---|
| ____ | (1) Classified Information | ____ | (6) Personal privacy |
| ____ | (2) Internal rules and practices | ____ | (7) Investigatory files |
| ✓ | (3) Exempted by other statute | ____ | (8) Banking Information |
| ____ | (4) Trade secrets and commercial or financial information | ____ | (9) Well Information (geographic or geophysical) |
| ____ | (5) Internal Documents | | |

Signed Jonathan M. Levin

date 10/28/83

FEC 9-21-77

83040134777

FEDERAL ELECTION COMMISSION

Remove Exposition

1) Tax return and financial statement of MediAmerica

2) Testimony pertaining to financial position of MediAmerica

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

| | | | |
|---|---|---|---|
| ____ | (1) Classified Information | ____ | (6) Personal privacy |
| ____ | (2) Internal rules and practices | ____ | (7) Investigatory files |
| ____ | (3) Exempted by other statute | ____ | (8) Banking Information |
| ✓ | (4) Trade secrets and commercial or financial information | ____ | (9) Well Information (geographic or geophysical) |
| ____ | (5) Internal Documents | | |

8304034774

Signed Jonathan M. Levin

Date 10/28/83

FEC 9-21-77

FEDERAL ELECTION COMMISSION Gerbe deposition

1) Tax return and financial statement of Medi America

2) Testimony pertaining to financial position of Medi America

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

| | | | |
|---|---|---|---|
| ____ | (1) Classified Information | ____ | (6) Personal privacy |
| ____ | (2) Internal rules and practices | ____ | (7) Investigatory files |
| ____ | (3) Exempted by other statute | ____ | (8) Banking Information |
| ✓ | (4) Trade secrets and commercial or financial information | ____ | (9) Well Information (geographic or geophysical) |
| ____ | (5) Internal Documents | | |

Signed Jonathan M. Levin

Date 10/28/83.

FEC 9-21-77

3304047775

FEDERAL ELECTION COMMISSION

King deposition

1) Deleted items from pp. 9 and 26 of Shirley King's deposition pursuant to 5 U.S.C. §5 U.S.C. § 552(b)(7)(C)

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

| | | | |
|---|---|---|---|
| ____ | (1) Classified Information | ____ | (6) Personal privacy |
| ____ | (2) Internal rules and practices | ✓ | (7) Investigatory files |
| ____ | (3) Exempted by other statute | ____ | (8) Banking Information |
| ____ | (4) Trade secrets and commercial or financial information | ____ | (9) Well Information (geographic or geophysical) |
| ____ | (5) Internal Documents | | |

Signed Jonathan M. Levin

Date 10/27/83

FEC 9-21-77

83040434776

FEDERAL ELECTION COMMISSION Brill deposition

1) Tax returns and financial statements of MediAmerica

2) Testimony pertaining to financial position of MediAmerica

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

| | | | |
|---|---|---|---|
| ____ | (1) Classified Information | ____ | (6) Personal privacy |
| ____ | (2) Internal rules and practices | ____ | (7) Investigatory files |
| ____ | (3) Exempted by other statute | ____ | (8) Banking Information |
| ✓ | (4) Trade secrets and commercial or financial information | ____ | (9) Well Information (geographic or geophysical) |
| ____ | (5) Internal Documents | | |

Signed Jonathan M. Levin

Date 10/28/83.

3304043477 7

FEC 9-21-77

Gcc# 946
RECEIVED AT THE FEC
MLUR 1363
83 OCT 13 P12:48


**SEDAM & HERGE**
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
SUITE 1100
8300 GREENSBORO DRIVE
McLEAN, VIRGINIA 22102
(703) 821-1000

GLENN J. SEDAM, JR.
J. CURTIS HERGE
ROBERT R. SPARKS, JR.
A. MARK CHRISTOPHER

JANIS A. CHERRY
JOHN ROBERT CLARK III
B. ERIC SIVERTSEN
SHARON L. POWERS
CLAIRE M. BOCCELLA

SUITE 820
1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(703) 821-1000
TELEX: 710-831-0896
CABLE: SEDAMHERGE


October 12, 1983

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

Dear Sirs:

Enclosed is the amended Statement of Organization, FEC Form 1, of MediAmerica National Candidates Committee (formerly known as National Candidates Committee), 1900 North Beauregard Street, Alexandria, Virginia 22311.

Very truly yours,

J. Curtis Herge

Enclosure

cc: Virginia State Board of Elections
Jonathan M. Levin, Esq.

# STATEMENT OF ORGANIZATION

(see reverse side for instructions)

| | |
|---|---|
| 1. (a) Name of Committee (in Full) ☒ Check if name is changed. Mediamerica National Candidates Committee | 2. Date October 3, 1983 |
| (b) Address (Number and Street) 1900 North Beauregard Street, Suite 12 | 3. FEC Identification Number C00130682 |
| (c) City, State and ZIP Code Alexandria, Virginia 22311 | 4. Is this an amended Statement? ☒ YES ☐ NO Change of Name |

5. TYPE OF COMMITTEE (check one):

- ☐ (a) This committee is a principal campaign committee. (Complete the candidate information below.)
- ☐ (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

| Name of Candidate | Candidate Party Affiliation | Office Sought | State/District |
|---|---|---|---|
| | | | |

- ☐ (c) This committee supports/opposes only one candidate _____ (name of candidate) and is NOT an authorized committee.
- ☐ (d) This committee is a _____ (National, State or subordinate) committee of the _____ (Democratic, Republican, etc.) Party.
- ☐ (e) This committee is a separate segregated fund.
- ☐ (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

6.

| Name of Any Connected Organization or Affiliated Committee | Mailing Address and ZIP Code | Relationship |
|---|---|---|
| | | |

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

☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization ☐ Membership Organization ☐ Trade Association ☐ Cooperative

7. Custodian of Records: Identify by name, address (phone number – optional) and position, the person in possession of committee books and records.

| Full Name | Mailing Address and ZIP Code | Title or Position |
|---|---|---|
| | | |

8. Treasurer: List the name and address (phone number – optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

| Full Name | Mailing Address and ZIP Code | Title or Position |
|---|---|---|
| | | |

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

| Name of Bank, Depository, etc. | Mailing Address and ZIP Code |
|---|---|
| | |

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

CHRISTINE GRIFFITH TRIBBLE — Christine Griffith Tribble — October 3, 1983

Type or Print Name of Treasurer — SIGNATURE OF TREASURER — Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.

For further information contact: Federal Election Commission, Toll Free 800-424-9530, Local 202-523-4068

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | | | | | | | |

FEC FORM 1 (3/80)

8304013477

SEDAM & HERGE
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
SUITE 1100
8300 GREENSBORO DRIVE
McLEAN, VIRGINIA 22102

83004043

P.M.
12 OCT
1983

75TH ANNIVERSARY
U.S. CONSTITUTION
1908 – 1983
VA.

Jonathan M. Levin, Esq.
Office of General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

BEFORE THE FEDERAL ELECTION COMMISSION

| | | |
|---|---|---|
| In the Matter of | ) | |
| | ) | MUR 1363 |
| MediAmerica, Inc. | ) | |
| The National Candidates Committee | ) | |
| D. Richard Geske | ) | |

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 23, 1983, the Commission decided by a vote of 5-0 to take the following actions in MUR 1363:

1. Approve the conciliation agreement as submitted with the General Counsel's Memorandum to the Commission dated September 20, 1983.

2. Close the file in this matter.

3. Approve the letters as attached to the Memorandum dated September 20, 1983.

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

Attest:

9-23-83
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary: 9-20-83, 3:40
Circulated on 48 hour tally basis: 9-21-83, 11:00

83040134731

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 27, 1983

E. Mark Braden, Chief Counsel
Republican National Committee
Dwight D. Eisenhower Republican Center
310 First Street, S.E.
Washington, D.C. 20003

Re: MUR 1363

Dear Mr. Braden:

This is in reference to the complaint you filed with the Commission on January 15, 1981, concerning violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by MediAmerica, Inc., the National Candidates Committee (formerly, the National Republican Candidates Committee), and three individuals.

After conducting an investigation in this matter the Commission determined there was probable cause to believe that MediAmerica, Inc. and the National Candidates Committee violated 2 U.S.C. §§ 432(e)(5), 433(b)(2), 433(c), and 441b(b)(4)(A)(1), provisions of the Act. On September 23, 1983, a conciliation agreement signed by counsel for the respondents was accepted by the Commission, thereby concluding the matter. A copy of this agreement is enclosed for your information.

The file number in this matter is MUR 1363. If you have any questions, please contact Jonathan Levin, the attorney assigned to this matter, at 202-523-4060.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

9304043473 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

E. Mark Braden, Chief Counsel
Republican National Committee
Dwight D. Eisenhower Republican Center
310 First Street, S.E.
Washington, D.C. 20003

JI 9/26/83

Re: MUR 1363

Dear Mr. Braden:

This is in reference to the complaint you filed with the Commission on January 15, 1981, concerning violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by MediAmerica, Inc., the National Candidates Committee (formerly, the National Republican Candidates Committee), and three individuals.

After conducting an investigation in this matter the Commission determined there was probable cause to believe that MediAmerica, Inc. and the National Candidates Committee violated 2 U.S.C. §§ 432(e)(5), 433(b)(2), 433(c), and 441b(b)(4)(A)(1), provisions of the Act. On , 1983, a conciliation agreement signed by counsel for the respondents was accepted by the Commission, thereby concluding the matter. A copy of this agreement is enclosed for your information.

The file number in this matter is MUR 1363. If you have any questions, please contact Jonathan Levin, the attorney assigned to this matter, at 202-523-4060.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

83040347835

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 27, 1983

Richard E. Messick, Legal Counsel
National Republican Senatorial Committee
Stanton Square Office Townhouses
404 C Street, N.E.
Washington, D.C. 20002

Re: MUR 1363

Dear Mr. Messick:

This is in reference to the complaint you filed with the Commission on January 15, 1981, concerning violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by MediAmerica, Inc., the National Candidates Committee (formerly, the National Republican Candidates Committee), and three individuals.

After conducting an investigation in this matter the Commission determined there was probable cause to believe that MediAmerica, Inc. and the National Candidates Committee violated 2 U.S.C. §§ 432(e)(5), 433(b)(2), 433(c), and 441b(b)(4)(A)(1), provisions of the Act. On September 23, 1983, a conciliation agreement signed by counsel for the respondents was accepted by the Commission, thereby concluding the matter. A copy of this agreement is enclosed for your information.

The file number in this matter is MUR 1363. If you have any questions, please contact Jonathan Levin, the attorney assigned to this matter, at 202-523-4060.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

39040434798

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Richard E. Messick, Legal Counsel
National Republican Senatorial Committee
Stanton Square Office Townhouses
404 C Street, N.E.
Washington, D.C. 20002

Re: MUR 1363 JI 9/26/83

Dear Mr. Messick:

This is in reference to the complaint you filed with the Commission on January 15, 1981, concerning violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by MediAmerica, Inc., the National Candidates Committee (formerly, the National Republican Candidates Committee), and three individuals.

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The file number in this matter is MUR 1363. If you have any questions, please contact Jonathan Levin, the attorney assigned to this matter, at 202-523-4060.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

93040343789

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 27, 1983

Lawrence J. Halloran, Legal Counsel
National Republican Congressional Committee
320 First Street, S.E.
Washington, D.C. 20003

Re: MUR 1363

Dear Mr. Halloran:

This is in reference to the complaint you filed with the Commission on January 15, 1981, concerning violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by MediAmerica, Inc., the National Candidates Committee (formerly, the National Republican Candidates Committee), and three individuals.

After conducting an investigation in this matter the Commission determined there was probable cause to believe that MediAmerica, Inc. and the National Candidates Committee violated 2 U.S.C. §§ 432(e)(5), 433(b)(2), 433(c), and 441b(b)(4)(A)(1), provisions of the Act. On September 23, 1983, a conciliation agreement signed by counsel for the respondents was accepted by the Commission, thereby concluding the matter. A copy of this agreement is enclosed for your information.

The file number in this matter is MUR 1363. If you have any questions, please contact Jonathan Levin, the attorney assigned to this matter, at 202-523-4060.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

83040434784

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Lawrence J. Halloran, Legal Counsel
National Republican Congressional Committee
320 First Street, S.E.
Washington, D.C. 20003

JT 9/26/83

Re: MUR 1363

Dear Mr. Halloran:

This is in reference to the complaint you filed with the Commission on January 15, 1981, concerning violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by MediAmerica, Inc., the National Candidates Committee (formerly, the National Republican Candidates Committee), and three individuals.

After conducting an investigation in this matter the Commission determined there was probable cause to believe that MediAmerica, Inc. and the National Candidates Committee violated 2 U.S.C. §§ 432(e)(5), 433(b)(2), 433(c), and 441b(b)(4)(A)(1), provisions of the Act. On , 1983, a conciliation agreement signed by counsel for the respondents was accepted by the Commission, thereby concluding the matter. A copy of this agreement is enclosed for your information.

The file number in this matter is MUR 1363. If you have any questions, please contact Jonathan Levin, the attorney assigned to this matter, at 202-523-4060.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 27, 1983

Robert R. Sparks, Jr., Esquire
Sedam & Herge
8300 Greensboro Drive
Suite 1100
McLean, Virginia 22102

Re: MUR 1363

Dear Mr. Sparks:

On September 23, 1983, the Commission accepted the conciliation agreement signed by J. Curtis Herge, Esquire, and a civil penalty in settlement of violations of 2 U.S.C. §§ 432(e)(5), 433(b)(2), 433(c), and 441b(b)(4)(A)(i), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

83040347938

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Robert R. Sparks, Jr., Esquire
Sedam & Herge
8300 Greensboro Drive
Suite 1100
McLean, Virginia 22102

Re: MUR 1363 JF 9/26/83

Dear Mr. Sparks:

On , 1983, the Commission accepted the conciliation agreement signed by J. Curtis Herge, Esquire, and a civil penalty in settlement of violations of 2 U.S.C. §§ 432(e)(5), 433(b)(2), 433(c), and 441b(b)(4)(A)(i), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

83040134793

127

NATIONAL REPUBLICAN CANDIDATES COMMITTEE
PH. 998-5278
1900 NORTH BEAUREGARD STREET, SUITE 12
ALEXANDRIA, VIRGINIA 22311

Riggs National Bank of Washington, D.C.
Alexandria, Va.

9-6 1983

69-108
560

PAY One thousand and no/100 DOLLARS $1,000.00

TO THE ORDER OF U.S. Treasurer

⑆056001066⑆ ⑈050 381 9⑈

DELUXE CHECK PRINTERS

ENDORSEMENT CONSTITUTES PAYMENT IN FULL FOR ANY AND ALL CLAIMS AGAINST NATIONAL REPUBLICAN CANDIDATES COMMITTEE.

ENDORSEE

**Negotiation of this check does not constitute acceptance by the Federal Election Commission of the proposed penalty. The proceeds of this check have been placed in a suspense account pending Commission consideration of the penalty.**

**95-35-0001**

Pay to the order of any Federal Reserve Bank or Branch or General Depositary for credit to the United States Treasury. This check is in payment of an obligation to the United States and must be paid at par. N.P. Do not wire non-payment.

Date of endorsement 9-13-83

Robert N. Baker, Asst. Staff Director for Administration
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

| | | |
|---|---|---|
| MediAmerica, Inc.<br>The National Candidates Committee<br>D. Richard Geske | )<br>)<br>)<br>) | MUR 1363 |

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by the Republican National Committee, the Republican Senatorial Committee and the National Republican Congressional Committee. An investigation has been conducted, and probable cause to believe has been found that MediAmerica, Inc., violated 2 U.S.C. § 441b(b)(4)(A)(i) by soliciting contributions to the National Candidates Committee from persons other than the executive and administrative personnel of MediAmerica, Inc., its stockholders, and their families. In addition, the Commission has found probable cause to believe that the National Candidates Committee violated 2 U.S.C. §§ 432(e)(5), 433(b)(2), and 441b(b)(4)(A)(i) by its failure to disclose its relationship as the separate segregated fund of MediAmerica, Inc., and for soliciting contributions from persons other than the executive and administrative personnel of MediAmerica, Inc., its stockholders, and their families. The Commission has also found probable cause to believe, alternatively, that MediAmerica, Inc., violated 2 U.S.C. § 441b(a) in connection with MediAmerica,

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Inc.'s, advances of goods and services to the National Candidates Committee and that the National Candidates Committee violated 2 U.S.C. § 441b(a) by accepting corporate contributions from MediAmerica, Inc. The Commission has also found probable cause to believe that D. Richard Geske violated 2 U.S.C. § 441b(a) by consenting to the corporate violations by MediAmerica, Inc., and that the National Candidates Committee violated 2 U.S.C. § 433(c) by failing to timely amend its statement of organization to list a new treasurer.

NOW THEREFORE, the Commission and Respondents, having duly entered into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i) do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding.

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

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

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

1. Respondent MediAmerica, Inc., is a corporation duly organized under the laws of the Commonwealth of Virginia.

2. Respondent National Candidates Committee is a political committee pursuant to 2 U.S.C. § 431(4).

3. D. Richard Geske is the President of MediAmerica, Inc., as well as a member of its board of directors and majority shareholder of MediAmerica, Inc.

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4. D. Richard Geske is the Chairman of the National Candidates Committee.

5. The National Candidates Committee (formerly the National Republican Candidates Committee) filed its Statement of Organization with the Commission on June 30, 1980.

6. The National Candidates Committee has been operated and directed solely by employees of MediAmerica, Inc.

7. The National Candidates Committee has never listed MediAmerica, Inc. on its Statement of Organization as its connected organization.

8. The National Candidates Committee has never included the name of MediAmerica, Inc., in its name.

9. MediAmerica, Inc. has solicited contributions to the National Candidates Committee from persons other than the executive and administrative personnel of MediAmerica, Inc., its stockholders, and their families.

10. The National Candidates Committee has solicited contributions from persons other than the executive and administrative personnel of MediAmerica, Inc., its stockholders, and their families.

V. Respondent MediAmerica, Inc., violated 2 U.S.C. § 441b(b)(4)(A)(i) by soliciting contributions on behalf of the National Candidates Committee from persons other than the executive

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and administrative personnel of MediAmerica, Inc., its stockholders, and their families.

VI. Respondent National Candidates Committee violated 2 U.S.C. §§ 433(b)(2), 432(e)(5), and 441b(b)(4)(A)(i) by failing to report, on its Statement of Organization, that MediAmerica, Inc., is its connected organization, by failing to include MediAmerica, Inc., in its name, and by soliciting contributions from persons other than the executive and administrative personnel of MediAmerica, Inc., its stockholders, and their families.

VII. Respondent National Candidates Committee violated 2 U.S.C. § 433(c) by failing to timely amend its Statement of Organization to list a new treasurer.

VIII. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of one thousand dollars ($1,000), pursuant to 2 U.S.C. § 437g(a)(5)(A).

IX. Respondent National Candidates Committee will change its name to include the name of MediAmerica pursuant to 2 U.S.C. § 432(e)(5).

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

XI. 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 civil

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action for relief in the United States Disctrict Court for the District of Columbia.

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

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

8 3 0 4 0 4 3 4 7 9 6

FOR THE COMMISSION:

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

September 26, 1983
Date

FOR RESPONDENTS

J. Curtis Herge
J. Curtis Herge, Esquire
Counsel for Respondents

August 29, 1983
Date

BEFORE THE FEDERAL ELECTION COMMISSION

| | | |
|---|---|---|
| In the Matter of | ) | |
| | ) | |
| The National Candidates Committee | ) | MUR 1363 |
| MediaAmerica, Inc. | ) | |
| D. Richard Geske | ) | |

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission Executive Session on April 13, 1983, do hereby certify that the Commission took the following actions in MUR 1363:

1. Decided by a vote of 4-2 to find probable cause to believe that MediaAmerica, Inc., and the National Candidates Committee violated 2 U.S.C. 441b(b)(4)(A)(i) in connection with the communications/solicitations for the National Candidates Committee beyond the stockholders and executive and administrative personnel of MediaAmerica, Inc., or their families and that the National Candidates Committee violated 2 U.S.C. §433(b)(2) for its failure to list MediaAmerica, Inc., as its connected organization and 2 U.S.C. §432(e)(5) for its failure to include "MediaAmerica" in its name.

   Commissioners Harris, McDonald, McGarry, and Reiche voted affirmatively for the decision; Commissioners Aikens and Elliott dissented.

2. Decided by a vote of 4-2 to find probable cause to believe, in the alternative, that MediaAmerica, Inc., violated 2 U.S.C. §441b(a) by advancing goods and services to the National Candidates Committee and 11 C.F.R. §114.10(a) by advancing goods and services to the National Candidates Committee not in the ordinary course of the corporation's business, and that the National Candidates Committee violated 2 U.S.C. §441b(a) by knowingly accepting such advances.

   Commissioners Harris, McDonald, McGarry, and Reiche voted affirmatively for the decision; Commissioners Aikens and Elliott dissented.

CONTINUED ON PAGE TWO

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3. Decided by a vote of 4-2 to

a) Find probable cause to believe that Richard Geske violated 2 U.S.C. §441b(a) by consenting to MediaAmerica's advances to the National Candidates Committee.

b) Find probable cause to believe the National Candidates Committee violated 2 U.S.C. §433(c) by failing to timely amend its statement of organization.

Commissioners Harris, McDonald, McGarry, and Reiche voted affirmatively for the decision; Commissioners Aikens and Elliott dissented.

Attest:

4-15-83

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel

DATE: April 4, 1983

SUBJECT: MUR 1363 - GC Rpt

The attached is submitted as an Agenda document for the Commission Meeting of April 12, 1983

Open Session _____

Closed Session X

| CIRCULATIONS | | DISTRIBUTION | |
|---|---|---|---|
| 48 Hour Tally Vote | [ ] | Compliance | [ ] |
| Sensitive | [ ] | | |
| Non-Sensitive | [ ] | Audit Matters | [ ] |
| 24 Hour No Objection | [ ] | Litigation | [ ] |
| Sensitive | [ ] | | |
| Non-Sensitive | [ ] | Closed MUR Letters | [ ] |
| Information | [ ] | Status Sheets | [ ] |
| Sensitive | [ ] | | |
| Non-Sensitive | [ ] | Advisory Opinions | [ ] |
| Other | [ ] | Other (see distribution below) | [ ] |

8304043479

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

83 APR 4 P3: 58

| | | |
|---|---|---|
| In the Matter of | ) | |
| | ) | |
| The National Candidates Committee | ) | MUR 1363 |
| MediaAmerica, Inc. | ) | |
| D. Richard Geske | ) | |

EXECUTIVE SESSION

APR 12 1983

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On January 16, 1981, the National Republican Senatorial Committee, et al., filed a complaint which alleged that MediaAmerica, Inc., is the connected organization of the National Candidates Committee (and that the latter is, therefore, MediaAmerica's separate segregated fund). Complainants asserted that if this is true, then MediaAmerica, Inc., and the National Candidates Committee violated 2 U.S.C. § 441b(b)(4)(A)(i) by soliciting contributions from individuals other than the executive and administrative personnel of MediaAmerica, or its stockholders and their families.

Alternatively, the complainant suggested that should MediaAmerica, Inc., not be viewed as the connected organization of the National Candidates Committee (and the latter not be viewed as the separate segregated fund of MediaAmerica, Inc.), then MediaAmerica, Inc., violated 2 U.S.C. § 441b(a) by impermissibly financing the activities of the National Candidates Committee through subsidization of the committee's expenses.

83040434800

Extensions of credit by MediaAmerica, Inc., to the National Candidates were alleged to have been inconsistent with the provisions of the Act. The President and Director of MediaAmerica, Inc., D. Richard Geske, was asserted to have violated 2 U.S.C. § 441b(a) by consenting to MediaAmerica's activities in contravention of the Act.

Several reporting violations were also raised in the complaint.

On July 14, 1981, the Commission determined there was reason to believe that MediaAmerica, Inc., violated 2 U.S.C. §§ 441b(a) and 441b(b)(4)(A)(i) and that the National Candidates Committee violated 2 U.S.C. §§ 432(e)(5), 433(c), 433(b)(2), 441b(a) and 441b(b)(4)(A)(i). In addition, the Commission concluded that there was reason to believe D. Richard Geske violated 2 U.S.C. § 441b(a). The details which supported the Commission's determinations are more fully set forth in the General Counsel's Brief.

On January 6, 1983, respondents submitted a brief which denied any violation by respondents under any theory 1/ and encouraged the Commission to conclude that there is no probable cause to believe respondents violated the Act.

---

1/ Respondents have earlier admitted a minor reporting violation (failure to timely amend the committee's Statement of Organization to reflect a change in the office of treasurer. (See 2 U.S.C. § 433(c)). We would assume that respondents failure to mention this in their brief does not indicate a change in their previous position.

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## II. LEGAL ANALYSIS

The Office of General Counsel has reviewed the brief submitted by respondents and has concluded that no new facts or legal analysis have been presented which would alter our view as expressed in the General Counsel's Brief of November 26, 1982. The General Counsel believes that the efforts which MediaAmerica, Inc., and the National Candidates Committee made to maintain the appearance of separateness do not remove their actions from the prohibitions of the Act. 2/

---

2/ During the course of the investigation into this matter, this Office deposed certain individuals association with respondents. One of those individuals, Mrs. Terre Linehan, stated that she never had been requested to participate in the committee's efforts. Other than for the purpose of providing some preliminary background information as to MediaAmerica's overall management structure, Ms. Linehan's deposition produced no information relevant to the issues in this matter. No reference to her testimony has been made in the General Counsel's Brief.

On January 19, 1983, Counsel for respondents submitted a letter requesting a copy of Ms. Linehan's deposition. On January 25, 1983, this Office informed counsel that we would decline the request.

Finally, on January 28, 1983, Counsel for respondents filed another request for the deposition of Ms. Linehan (See Attachment 1), arguing that it may provide exculpatory evidence. Counsel's understanding of what Ms. Linehan testified to is based upon what she apparently recounted to Mr. Geske in a later discussion of the matter.

This Office has considered the issues presented by counsel in favor of releasing the transcript and has concluded that, on the basis of the Commission's role as an investigative agency, release of the transcript is inappropriate. There is no statutory right of access to investigative files; indeed investigations conducted by the Commission may even be viewed as analagous to proceedings conducted by a Grand Jury. Furthermore, considering that decisions of the Commission are subject to de novo review by the appropriate district court, (in the event that civil suit was instituted under 2 U.S.C. § 437g(a)(6)(A)) respondents would at that time be entitled to evidence under normal discovery rules.

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IV. **RECOMMENDATIONS**

1. Find probable cause to believe that MediaAmerica, Inc., and the National Candidates Committee violated 2 U.S.C. § 441b(b)(4)(A)(i) in connection with the communications/solicitations for the National Candidates Committee beyond the stockholders and executive and administrative personnel of MediaAmerica, Inc., or their families and that the National Candidates Committee violated 2 U.S.C. § 433(b)(2) for its failure to list MediaAmerica, Inc., as its connected organization and 2 U.S.C. § 432(e)(5) for its failure to include "MediaAmerica" in its name.

2. Find probable cause to believe, in the alternative, that MediaAmerica, Inc., violated 2 U.S.C. § 441b(a) by advancing goods and services to the National Candidates Committee and that the National Candidates Committee violated 2 U.S.C. § 441b(a) by knowingly accepting such advances.

3. Find probable cause to believe that D. Richard Geske violated 2 U.S.C. § 441b(a) by consenting to MediaAmerica's advances to the National Candidates Committee.

4. Find probable cause to believe the National Candidates Committee violated 2 U.S.C. § 433(c) by failing to timely amend its statement of organization.

5. Send the attached letter and proposed conciliation agreement.

April 1, 1983
Date

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Attachments
1. Request from Robert Sparks, January 28, 1983
2. Proposed conciliation agreement
3. Letter to Robert Sparks, counsel for respondents

8304043480

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ROBERT R. SPARKS, JR.
A. MARK CHRISTOPHER

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JOHN ROBERT CLARK III
B. ERIC SIVERTSEN
SHARON L. POWERS
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TELEX: 710-831-0896
CABLE: SEDANHERGE

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OFFICE OF THE SECRETARY
83 JAN 31 P 2: 06

January 28, 1983

83 JAN 31 P 4: 23

Mr. Danny L. McDonald
Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1363

Dear Chairman McDonald:

This firm represents the respondents in this matter, D. Richard Geske, MediAmerica, Inc. and National Candidates Committee. In that capacity, we filed with the Commission on January 6, 1983, our Brief for respondents in response to the General Counsel's Brief to the Commission. In his Brief, the General Counsel recommended a finding of probable cause that respondents violated certain provisions of the Federal Election Campaign Act (FECA).

The General Counsel's Brief contains extensive quotations from, and relies heavily on, three depositions taken in the course of the investigation in this matter. The depositions were taken of Messrs. Geske and Romanin and Ms. King, all current or former principals or employees of MediAmerica or National Candidates Committee. We attended the deposition of Mr. Geske, but in accordance with the policy of the Office of General Counsel, we were not informed of, and hence were not able to attend, the deposition of Mr. Romanin or Ms. King. After reviewing the General Counsel's Brief to the Commission, supplied to us pursuant to 2 U.S.C. §437g(a)(3), we asked for and received from the Office of General Counsel copies of the depositions of the above individuals. Using those depositions, we prepared our Brief, which we filed with the Commission on behalf of the respondents, on January 6, 1983.

On January 18, 1983, this firm learned that the Office of General Counsel had deposed Ms. Tere Linehan, a former employee of MediAmerica. Ms. Linehan told Mr. Geske that she

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Attachment 1, page 1

testified under oath in her deposition as to matters which we believe are exculpatory of the violations asserted by the General Counsel in his probable cause Brief to the Commission. Accordingly, by letter dated January 19, 1983, we wrote to the General Counsel, asking for a copy of Ms. Linehan's deposition, and any other depositions taken in this matter, so that we might review them and, if appropriate, prepare a supplementary Brief in response to the General Counsel's Brief. I enclose a copy of that letter. I also enclose a copy of the response of Kenneth A. Gross, Associate General Counsel, denying our request.

Mr. Gross states that because Ms. Linehan's deposition was not referred to by the General Counsel in his Brief to the Commission, we are not entitled to review that deposition to see if it contains exculpatory material. Except to say that in his view FECA does not require it, Mr. Gross cites no authority for his refusal, nor even any policy of the General Counsel of which we are aware, to justify his refusal.[1] We do not believe that the letter or the spirit of FECA or the Commission's regulations thereunder permit the General Counsel to select what evidence it will rely on in its recommendation to the Commission, with the result that it can thereby select what evidence it must disclose to respondent or his counsel. It seems to be the position of the General Counsel that where evidence exculpatory of a respondent is found by the General Counsel in the course of his investigation of a matter, so long as the General Counsel does not mention that evidence in his Brief to the Commission, respondent and his counsel may not have access to that information. We contend that that policy is inimical to due process, common sense, and fair proceedings under FECA.

We bring this matter to the attention of the Commission because we are aware that the General Counsel is about to present its recommendation in the referenced matter to the Commission for a vote on probable cause. We think it imperative that the Commission know that exculpatory evidence may exist.

---

[1] Such an unsupported statement of policy may violate 2 U.S.C. §437f(b), which forbids the promulgation of rules or regulations under FECA except pursuant to 2 U.S.C. §438(d).

It may be that Ms. Linehan's deposition, and any other depositions taken by the Commission in this case of which we are not now aware, do not exculpate respondents and are not relevant to the current proceedings. But neither we nor the Commission knows that at this point. Only the General Counsel knows what evidence exists in this case, and he has selected the evidence the Commission and the respondents are to see.

We understand that should the Commission vote to find probable cause in this matter, should conciliation fail, and should the Commission vote to institute a civil action for relief, respondents may be successful in obtaining the now-withheld evidence. We believe, however, that respondents should be permitted access to the General Counsel's secret evidence without first having to be sued in federal court. It may be that, after reviewing all of the General Counsel's evidence, respondents may admit the alleged violations and a conciliation agreement could be reached, obviating the need for civil proceedings. But so long as respondents in this matter believe that evidence which exculpates them is being withheld by the Commission, they cannot conciliate this matter. Thus, the General Counsel's position in denying the requested evidence has exactly the opposite effect intended by FECA. The Act favors conciliated agreements between the Commission and respondents. It does not favor protracted and expensive federal court proceedings to resolve disputes. But that will be exactly the result of the position taken by the General Counsel in this matter.

We would be happy to communicate directly with the Commission or, if necessary, through the Office of General Counsel, to answer any questions you may have in this matter.

Sincerely,

Robert R. Sparks, Jr.

Robert R. Sparks, Jr.

cc: John T. Dolan

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 25, 1983

Robert Sparks, Esquire
Sedam & Berge
Suite 1100
8300 Greensboro Drive
McLean, Virginia 22102

Re: MUR 1363

Dear Mr. Sparks:

This is in response to your letter to this Office dated January 19, 1983, wherein you requested a copy of a deposition taken by the Office of General Counsel of Tere Linehan in the above-captioned matter. I have reviewed the file and note that Ms. Linehan's testimony was not referred to in the General Counsel's Brief. We believe the statute does not contemplate making her deposition available to you under these circumstances.

Should you have any further questions, please contact Stephen Mims, the staff member assigned to this matter, at (202)523-4039.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

8304043480

Attachment 1, page 4

January 19, 1983

Mr. Stephen Mins
Office of General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

BY HAND

Re: MUR 1363

Dear Mr. Mins:

On January 18, 1983, this firm learned for the first time that in the course of the Commission's investigation of this matter, you or another member of the Office of General Counsel deposed Ms. Terry Lanahan at length concerning, among other things, what, if any, influence Mr. Geske exerted on her to become an officer of NCC.

No mention is made of that fact in any part of the General Counsel's Brief to the Commission recommending a finding of probable cause in this matter. We believe that Ms. Lanahan testified clearly that Mr. Geske did not in any manner pressure her to act as treasurer for NCC. The failure of the General Counsel to inform the Commission of this evidence is puzzling. It seems that the General Counsel has selectively distilled for the Commission only that evidence that seems to support the General Counsel's recommendation, and has ignored all contrary evidence. Counsel for NCC would normally be unable to present that evidence to the Commission, since it has long been the position of the General Counsel that counsel for respondent is not permitted to attend investigative depositions and, is not even entitled to know that such depositions have been taken.

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Attachment 1, page 5

I hereby request a copy of Ms. Lanahan's deposition taken in this matter, and copies of all other depositions taken (other than those of Messrs. Geske and Romanin and Ms. King, which you have already supplied to me), so that we may review them, and fully and completely advise the Commission of all the evidence available in this matter.

I look forward to your immediate response, so that this firm can prepare its submission to the Commission before a final vote is taken on probable cause.

Sincerely,

Robert R. Sparks, Jr.

8304043815

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Robert Sparks, Esquire
Sedam & Herge
Suite 1100
8300 Greensboro Drive
McLean, Virginia 22102

Re: MUR 1363
MediaAmerica, Inc.
National Candidates Committee
D. Richard Geske

8304043481

Dear Mr. Sparks:

On , 1983, the Commission determined there is probable cause to believe that your clients violated the Federal Election Campaign Act of 1971, as amended, in connection with MediaAmerica, Inc.'s, relationship with the National Candidates Committee.

The Commission has a duty to attempt to correct such violations for a period of 30 to 90 days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. If we are unable to reach an agreement during that period, the Commission may institute civil suit in United States District Court and seek payment of a civil penalty.

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

For your information, your written request for a copy of the transcript of Terre Linehan's deposition was submitted to the Commission for consideration along with your response brief. The Commission was advised that Ms. Linehan testified that she did not perform services on behalf of the National Candidates Committee and that she was not asked to do so.

Attachment 3, page 1

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Stephen Mims, the staff member assigned to this matter, at (202)523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Conciliation Agreement

8304043481

Attachment 3, page 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/JODY C. RANSOM JCR

DATE: MARCH 17, 1983

SUBJECT: MUR 1363 - Comprehensive Investigative Report #3, signed March 15, 1983

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 11:00, March 16, 1983.

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

83040434813

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel

DATE: March 16, 1983

SUBJECT: MUR 1363 - Comp Inv Rpt #3

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

Open Session _____

Closed Session _____

| CIRCULATIONS | | DISTRIBUTION | |
|---|---|---|---|
| 48 Hour Tally Vote | [ ] | Compliance | [✓] |
| Sensitive | [ ] | | |
| Non-Sensitive | [ ] | Audit Matters | [ ] |
| 24 Hour No Objection | [✓] | Litigation | [ ] |
| Sensitive | [✓] | | |
| Non-Sensitive | [ ] | Closed MUR Letters | [ ] |
| Information | [ ] | Status Sheets | [ ] |
| Sensitive | [ ] | | |
| Non-Sensitive | [ ] | Advisory Opinions | [ ] |
| Other | [ ] | Other (see distribution below) | [ ] |

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COMMISSION SECRETARY
83 MAR 16 A 8: 56

BEFORE THE FEDERAL ELECTION COMMISSION

| | | |
|---|---|---|
| In the Matter of | ) | |
| | ) | |
| The National Candidates Committee and D. Richard Geske | ) | MUR 1363 |

COMPREHENSIVE INVESTIGATIVE REPORT # 3

The Office of General Counsel is presently reviewing a draft of the probable cause report in the above-captioned matter. Respondents' counsel has recently made a request for a copy of the deposition transcript of Ms. Tere Linehan. (Ms. Linehan is not represented by counsel and is not named as a respondent in this matter.) The subject of this request and the position of the General Counsel is treated in the probable cause report which should be forwarded to the Commission within thirty days.

83040348115

15 March 1983
Date

Charles N. Steele
General Counsel

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RECEIVED BY THE FEC
GCC#9641
83 MAR 10 PM: 48

MEDIAMERICA

Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 998-0334

March 1, 1983

83 MAR 10 P1:52

Mr. Charles N. Steele
General Counsel
Mr. Kenneth A. Gross
Associate General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 1363

Gentlemen:

We are in receipt of your letter of 2/18/83. It is my understanding that the matter under review (MUR 1363) has been closed.

We wish to thank you for your attention to this matter.

Sincerely,

D. Richard Geske

DRG/dr

83040434816

MEDIAMERICA

Mark Center Office Plaza 5
5900 N. Beauregard Street, Suite 12
Alexandria, VA 22311

NORTHERN VIRGINIA, VA 220
PM
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1983

83 MAR

Mr. Charles N. Steele
General Counsel
Mr. Kenneth A. Gross
Associate General Counsel
Federal Election Commission
Washington, D.C. 20463

Sec# 9440

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B. ERIC SIVERTSEN
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CABLE: SEDAMHERGE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY
83 JAN 31 P 2: 06

January 28, 1983

83 JAN 31 P 4: 23

Mr. Danny L. McDonald
Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1363

Dear Chairman McDonald:

This firm represents the respondents in this matter, D. Richard Geske, MediAmerica, Inc. and National Candidates Committee. In that capacity, we filed with the Commission on January 6, 1983, our Brief for respondents in response to the General Counsel's Brief to the Commission. In his Brief, the General Counsel recommended a finding of probable cause that respondents violated certain provisions of the Federal Election Campaign Act (FECA).

The General Counsel's Brief contains extensive quotations from, and relies heavily on, three depositions taken in the course of the investigation in this matter. The depositions were taken of Messrs. Geske and Romanin and Ms. King, all current or former principals or employees of MediAmerica or National Candidates Committee. We attended the deposition of Mr. Geske, but in accordance with the policy of the Office of General Counsel, we were not informed of, and hence were not able to attend, the deposition of Mr. Romanin or Ms. King. After reviewing the General Counsel's Brief to the Commission, supplied to us pursuant to 2 U.S.C. §437g(a)(3), we asked for and received from the Office of General Counsel copies of the depositions of the above individuals. Using those depositions, we prepared our Brief, which we filed with the Commission on behalf of the respondents, on January 6, 1983.

On January 18, 1983, this firm learned that the Office of General Counsel had deposed Ms. Tere Linehan, a former employee of MediAmerica. Ms. Linehan told Mr. Geske that she

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testified under oath in her deposition as to matters which we believe are exculpatory of the violations asserted by the General Counsel in his probable cause Brief to the Commission. Accordingly, by letter dated January 19, 1983, we wrote to the General Counsel, asking for a copy of Ms. Linehan's deposition, and any other depositions taken in this matter, so that we might review them and, if appropriate, prepare a supplementary Brief in response to the General Counsel's Brief. I enclose a copy of that letter. I also enclose a copy of the response of Kenneth A. Gross, Associate General Counsel, denying our request.

Mr. Gross states that because Ms. Linehan's deposition was not referred to by the General Counsel in his Brief to the Commission, we are not entitled to review that deposition to see if it contains exculpatory material. Except to say that in his view FECA does not require it, Mr. Gross cites no authority for his refusal, nor even any policy of the General Counsel of which we are aware, to justify his refusal.[1] We do not believe that the letter or the spirit of FECA or the Commission's regulations thereunder permit the General Counsel to select what evidence it will rely on in its recommendation to the Commission, with the result that it can thereby select what evidence it must disclose to respondent or his counsel. It seems to be the position of the General Counsel that where evidence exculpatory of a respondent is found by the General Counsel in the course of his investigation of a matter, so long as the General Counsel does not mention that evidence in his Brief to the Commission, respondent and his counsel may not have access to that information. We contend that that policy is inimical to due process, common sense, and fair proceedings under FECA.

We bring this matter to the attention of the Commission because we are aware that the General Counsel is about to present its recommendation in the referenced matter to the Commission for a vote on probable cause. We think it imperative that the Commission know that exculpatory evidence may exist.

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[1] Such an unsupported statement of policy may violate 2 U.S.C. §437f(b), which forbids the promulgation of rules or regulations under FECA except pursuant to 2 U.S.C. §438(d).

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It may be that Ms. Linehan's deposition, and any other depositions taken by the Commission in this case of which we are not now aware, do not exculpate respondents and are not relevant to the current proceedings. But neither we nor the Commission knows that at this point. Only the General Counsel knows what evidence exists in this case, and he has selected the evidence the Commission and the respondents are to see.

We understand that should the Commission vote to find probable cause in this matter, should conciliation fail, and should the Commission vote to institute a civil action for relief, respondents may be successful in obtaining the now-withheld evidence. We believe, however, that respondents should be permitted access to the General Counsel's secret evidence without first having to be sued in federal court. It may be that, after reviewing all of the General Counsel's evidence, respondents may admit the alleged violations and a conciliation agreement could be reached, obviating the need for civil proceedings. But so long as respondents in this matter believe that evidence which exculpates them is being withheld by the Commission, they cannot conciliate this matter. Thus, the General Counsel's position in denying the requested evidence has exactly the opposite effect intended by FECA. The Act favors conciliated agreements between the Commission and respondents. It does not favor protracted and expensive federal court proceedings to resolve disputes. But that will be exactly the result of the position taken by the General Counsel in this matter.

We would be happy to communicate directly with the Commission or, if necessary, through the Office of General Counsel, to answer any questions you may have in this matter.

Sincerely,

Robert R. Sparks, Jr.

cc: John T. Dolan

8 3 0 4 0 4 3 4 8 1 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 25, 1983

Robert Sparks, Esquire
Sedam & Herge
Suite 1100
8300 Greensboro Drive
McLean, Virginia 22102

Re: MUR 1363

Dear Mr. Sparks:

This is in response to your letter to this Office dated January 19, 1983, wherein you requested a copy of a deposition taken by the Office of General Counsel of Tere Linehan in the above-captioned matter. I have reviewed the file and note that Ms. Linehan's testimony was not referred to in the General Counsel's Brief. We believe the statute does not contemplate making her deposition available to you under these circumstances.

Should you have any further questions, please contact Stephen Mims, the staff member assigned to this matter, at (202)523-4039.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

8 3 0 4 0 4 3 4 8 2 1

January 19, 1983

Mr. Stephen Mims
Office of General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

BY HAND

Re: MUR 1363

Dear Mr. Mims:

On January 18, 1983, this firm learned for the first time that in the course of the Commission's investigation of this matter, you or another member of the Office of General Counsel deposed Ms. Terry Lanahan at length concerning, among other things, what, if any, influence Mr. Geske exerted on her to become an officer of NCC.

No mention is made of that fact in any part of the General Counsel's Brief to the Commission recommending a finding of probable cause in this matter. We believe that Ms. Lanahan testified clearly that Mr. Geske did not in any manner pressure her to act as treasurer for NCC. The failure of the General Counsel to inform the Commission of this evidence is puzzling. It seems that the General Counsel has selectively distilled for the Commission only that evidence that seems to support the General Counsel's recommendation, and has ignored all contrary evidence. Counsel for NCC would normally be unable to present that evidence to the Commission, since it has long been the position of the General Counsel that counsel for respondent is not permitted to attend investigative depositions and, is not even entitled to know that such depositions have been taken.

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I hereby request a copy of Ms. Lanahan's deposition taken in this matter, and copies of all other depositions taken (other than those of Messrs. Geske and Romanin and Ms. King, which you have already supplied to me), so that we may review them, and fully and completely advise the Commission of all the evidence available in this matter.

I look forward to your immediate response, so that this firm can prepare its submission to the Commission before a final vote is taken on probable cause.

Sincerely,

Robert R. Sparks, Jr.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 25, 1983

Robert Sparks, Esquire
Sedam & Herge
Suite 1100
8300 Greensboro Drive
McLean, Virginia 22102

Re: MUR 1363

Dear Mr. Sparks:

This is in response to your letter to this Office dated January 19, 1983, wherein you requested a copy of a deposition taken by the Office of General Counsel of Tere Linehan in the above-captioned matter. I have reviewed the file and note that Ms. Linehan's testimony was not referred to in the General Counsel's Brief. We believe the statute does not contemplate making her deposition available to you under these circumstances.

Should you have any further questions, please contact Stephen Mims, the staff member assigned to this matter, at (202)523-4039.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

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January 19, 1983

Mr. Stephen Mims
Office of General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

BY HAND

Re: MUR 1363

Dear Mr. Mims:

On January 18, 1983, this firm learned for the first time that in the course of the Commission's investigation of this matter, you or another member of the Office of General Counsel deposed Ms. Terry Lanahan at length concerning, among other things, what, if any, influence Mr. Geske exerted on her to become an officer of NCC.

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I look forward to your immediate response, so that this firm can prepare its submission to the Commission before a final vote is taken on probable cause.

Sincerely,

Robert R. Sparks, Jr.

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BY HAND

Mr. Stephen Mims
Office of General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

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TELEX: 710-831-0896

CABLE: SEDAMHERGE


January 6, 1983

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

Re: MUR 1363

Dear Sir:

Enclosed herewith, in accordance with 11 CFR 111.16(c), are ten (10) copies of the Brief of National Candidates Committee, MediAmerica, Inc. and Mr. D. Richard Geske, the respondents in the above-captioned matter. The time for submitting this Brief was extended to January 7, 1983, as confirmed in a letter from the General Counsel to the undersigned dated December 15, 1982.

We are submitting to the Office of General Counsel under separate cover, together with a copy of this letter, three (3) copies of the enclosed Brief.

Very truly yours,

(Sgd) J. Curtis Herge

J. Curtis Herge

enclosures

cc: General Counsel
Federal Election Commission


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GCC#9258

MUR 1363

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

NATIONAL CANDIDATES COMMITTEE,
MEDIAMERICA, INC.

and

D. RICHARD GESKE

Respondents.

Brief for Respondents National Candidates Committee, MediAmerica, Inc. and D. Richard Geske

J. Curtis Herge, Esq.
Robert R. Sparks, Jr., Esq.

Sedam & Herge, P.C.
8300 Greensboro Drive
McLean, Virginia 22102
(703) 821-1000

Attorneys for Respondents

January 6, 1983

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## STATEMENT OF FACTS

In the spring of 1980, Mr. D. Richard Geske had a series of conversations with a number of his friends about his idea of organizing a new multicandidate committee. He formulated his plan following publicity about the potential impact on Federal elections of the so-called Obey-Railsback campaign reform legislation, it being his belief that contribution limitations in that legislation encouraged the establishment of additional committees. (Geske deposition at page 9.) One of the individuals most interested in Mr. Geske's idea was Mr. John D. Romanin, who later served as National Finance Chairman and Treasurer of the committee which was established. (Geske deposition at page 23.) Mr. Romanin has testified that both he and Mr. Geske were interested and active in politics and believed that the new committee provided them with an opportunity to play a more direct role in the political process. (Romanin deposition at pages 7, 8 and 13.) They hoped to accomplish that result by raising funds for the committee through the medium of direct mail solicitations.

The original Statement of Organization of the committee was filed with the Commission on or about June 30, 1980, the committee's original name being "National Republican Candidates' Committee." The Statement of Organization was signed by Karen Dent, who, at Mr. Geske's invitation, volunteered to be the committee's treasurer. (Geske deposition at pages 20, 25-26.)

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While Mr. Geske, Mr. Romanin and Mrs. Dent were all employees of MediAmerica, Inc., Mr. Geske has testified that he talked with them about his plans for the committee in their capacity as his friends and not as business colleagues. (Geske deposition at pages 14, 15, 22, 24, 37-42.) Neither the idea for, nor the proposed organization of, the committee was ever presented for consideration or approval by the Board of Directors of MediAmerica, Inc. Indeed, both Mr. Geske and Mr. Romanin testified that Mr. Geske was solely responsible for forming the committee. (Geske deposition at page 9; Romanin deposition at pages 8 and 9.)

One of the goals of the committee's organizers was to solicit contributions to the committee through the use of direct mail while limiting the committee's overhead and operating costs to the maximum extent possible, thus enabling the committee to maximize its contributions to candidates. (Geske deposition at page 27.) Messrs. Geske and Romanin investigated a number of alternative means of administering the committee's affairs. These included the possibility of hiring full time personnel to administer the committee's affairs, looking for office space and investigating the fees charged by various direct mail and marketing firms. (Romanin deposition at page 10; Geske deposition at pages 27 and 30.) It was concluded, nonetheless, that the prices charged by MediAmerica, Inc. for direct mail and marketing services were the best available in the industry. (Geske deposition at page 30; Romanin deposition at page 10.) As a

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consequence, the committee retained MediAmerica, Inc. to handle its direct mail fundraising and related administrative affairs. (Geske deposition at page 45.)

MediAmerica, Inc. ("MediAmerica") is a direct mail fund raising and marketing firm, which represents a number of candidates, political committees and issue-oriented nonprofit organizations. (Romanin deposition at page 5.) As such, the services rendered to the committee by MediAmerica were the same or similar to the services it rendered to its other clients. (Romanin deposition at pages 36 and 37; Geske deposition at pages 102-106.) In addition, the terms upon which credit was extended to the committee by MediAmerica was similar to the terms upon which MediAmerica extended credit to its other clients. (Romanin deposition at page 80; King deposition at pages 38 and 39.) In fact, MediAmerica was fastidious in identifying the expenses incurred by the committee, including the allocable share of personnel costs, files, office space, telephones, supplies, computer time, etc., and in billing those costs to the committee at its usual rates. (King deposition at pages 11-13, 27 and 28; Geske deposition at pages 109,110, 121 and 124.) Furthermore, space in MediAmerica's offices was specifically delineated and set aside for the exclusive use of the committee and the committee paid rent for that space. (Romanin deposition at page 72; Geske deposition at pages 109-111.) As officers of the committee, Mr. Geske and Mr. Romanin made every reasonable effort to discuss the committee's affairs and policies in their "free

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time" (Romanin deposition at page 86), "after work" (Geske deposition at page 25) and "usually over dinner" (Romanin deposition at pages 16 and 41). The very few discussions Mr. Geske and Mr. Romanin had in their office about the committee's affairs were measured, cumulatively, in "minutes." (Geske deposition at page 121.) On the other hand, the basic, fundamental rule for those at MediAmerica who performed a fund-raising or administrative function for the committee was that of "fulfilling a service to a client" and MediAmerica billed the committee for those services. (Geske deposition at pages 48 and 49.)

MediAmerica produced and mailed two direct mail fund raising solicitations on behalf of the committee. The first solicitation was dated October 25, 1980 and the second was dated December 5, 1980. MediAmerica billed the committee $8,305.92 for the production and mailing of the first solicitation (see MediAmerica invoice #758); $9,543.60 for the production and mailing of the second solicitation (see MediAmerica invoice #000010); and, $2,064.50 for salaries, administrative and operating costs (see MediAmerica invoices #772 and #776). Of that obligation, the committee paid MediAmerica a total of $5,564.50 on December 1, 1980 and an additional $2,000.00 on January 10, 1981. The balance of the committee's obligation to MediAmerica, $12,349.52, remains outstanding.

While the Office of General Counsel takes the view that that outstanding obligation supports a finding that either (1)



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the committee is the separate segregated fund of MediAmerica, or (2) the extension of credit to the committee by MediAmerica is unlawful, it should be noted that Mr. Geske has testified that the obligation has remained unpaid upon the advice of counsel. (Geske deposition at pages 101-102, 107 and 108.) In order for the committee to be able to pay the remaining obligation, it would be necessary for the committee to again solicit funds by means of direct mail solicitations. For the reasons set forth below, Mr. Geske and the committee were advised not to solicit additional funds on behalf of the committee and, therefore, to leave unpaid the balance still due MediAmerica.

> (1) By letter dated December 12, 1980, the United States Postal Service complained to the committee that the use of an altered eagle logotype on its direct mail solicitations appeared to infringe upon the official logo utilized by the Postal Service.
>
> (2) In the second half of December, 1980 and in the first week or ten days of January, 1981, representatives of the Republican National Committee (RNC), the National Republican Congressional Committee (NRCC) and the National Republican Senatorial Committee (NRSC) telephoned Messrs. Geske and Romanin to complain about the use of the word "Republican" in the name of the committee*/ and to complain about the text of the solicitations mailed by the committee.
>
> (3) On January 15, 1981, the RNC, NRCC and NRSC executed and filed the instant complaint against the respondents.

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*/These concerns were later remedied when National Republican Candidates Committee changed its name to National Candidates Committee ("NCC").



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(4) By letter dated January 21, 1981, the United States Postal Service again wrote to the committee about the apparent use of the altered eagle logotype.

(5) On February 10, 1981, a Federal grand jury empaneled to investigate a mail fraud complaint lodged against the committee relating to the text of its direct mail solicitations issued a subpoena for certain documents and records of the committee to be produced to the grand jury.

As a consequence of the foregoing, the committee was faced with a possible civil and/or criminal action based upon the alleged unauthorized use of an official seal and registered trademark; a criminal investigation based upon the text of its solicitations; and, a compliance proceeding before the Federal Election Commission on the question whether the committee is the separate segregated fund of MediAmerica. This state of affairs led to the advice of counsel referred to by Mr. Geske, a matter that will be developed further in the next portion of this brief.

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## ARGUMENT

### I. THE CREDIT EXTENDED TO NATIONAL CANDIDATES COMMITTEE BY MEDIAMERICA, INC. WAS EXTENDED IN THE ORDINARY COURSE OF THE CORPORATION'S BUSINESS

Corporations are prohibited from making contributions or expenditures in connection with any Federal election. See 2 U.S.C. 441b and Part 114 of the Commission's regulations. The term "contribution," in this context, is defined to include the extension of credit for a length of time beyond normal business or trade practice. See 11 CFR 100.4(a)(6). Moreover, according

to section 114.10(a) of the Commission's regulations, a corporation may extend credit to a political committee only if that credit is extended in the ordinary course of the corporation's business and the terms are substantially similar to extensions of credit to nonpolitical debtors which are of similar risk and size of obligation.

In its Brief, the Office of General Counsel recommends that the Commission find probable cause to believe that MediAmerica violated 2 U.S.C. 441b(a) by extending credit to NCC and that NCC violated 2 U.S.C. 441b(a) by knowingly accepting such credit. It also recommends that the Commission find probable cause to believe that Mr. Geske violated 2 U.S.C. 441b(a) by consenting to MediAmerica's extension of credit to NCC. These recommendations are grounded upon the initial extension of credit to NCC by MediAmerica; a question whether the cost of the mailing list used for the solicitations made by NCC was charged to NCC; and, the fact that, since January 10, 1981, the sum of $12,349.52 has been owed MediAmerica by NCC.

With respect to the initial extension of credit to NCC by MediAmerica, it is neither unusual, nor unlawful, for a direct mail fund raising and marketing firm to extend credit to a political committee. In Advisory Opinion 1979-36, for example, a direct mail fund raising and marketing firm, Working Names, Inc., sought approval to develop a fund-raising campaign for the Committee for Fauntroy, a plan that included the initial extension of credit to its client. Specifically, Working Names was to



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incur initial expenses in preparing and mailing fund raising materials, such expenses plus a fee to be paid from the results of the mailings. Evidence was presented to the Commission that, within the direct mail industry, this proposed type of financing arrangement represented an ordinary mode of operation. In addressing the request for its opinion, the Commission concluded, as follows:

> ...if, in fact, (1) the proposed financial agreement with its provisions for expenses to be initially incurred by Working Names, and for limited liability on behalf of the Committee if the direct mail is "unsuccessful," is of a type which is normal industry practice and contains the type of credit which is extended in the ordinary course of Working Names' business with terms which are substantially similar to those given to nonpolitical, as well as political, debtors of similar risk and size of obligation, and if (2) the costs charged the Committee for services are at least the normal charge for services of that type, then the amounts expended by Working Names will not be considered to be campaign contributions. If, however, any of these provisions deviate from Working Names' normal course of doing business, then a prohibited contribution could result.

The working relationship between MediAmerica and NCC met the requirements set down by the Commission in AO 1979-36.

In its investigation into this matter, the Office of General Counsel heard testimony from Mr. Geske, Mr. Romanin and Mrs. King that the type and terms of credit extended to NCC by MediAmerica was no different than the type and terms extended to its nonpolitical, as well as political, clients. (Geske deposition at pages 98 and 102-106; Romanin deposition at pages 36, 37 and 53; King deposition at pages 38 and 39.) This testimony



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finds support in the volume of invoices MediAmerica provided to the Office of General Counsel, showing the rendition by MediAmerica of similar services, and the extension of similar credit, to its nonpolitical, as well as its other political, customers. Furthermore, the same testimony and invoices demonstrate that the charges to NCC by MediAmerica were no less than the normal charges MediAmerica billed for services of the same type.

The Office of General Counsel suggests that the extension of credit by MediAmerica to NCC was outside the ordinary course of its business because it was not negotiated at "arm's length," which the Office of General Counsel suggests results in something other than "a normal vendor-vendee relationship." (General Counsel's Brief at page 13.) It is not clear, in making this argument, whether the Office of General Counsel believes MediAmerica charged too much or too little to NCC. On page 8 of its Brief, for example, the Office of General Counsel charges that "no effort appears to have been made to explore whether any other direct mail firm could provide better or cheaper services to the National Candidates Committee." As noted on page 2 of this Brief, however, Messrs. Geske and Romanin did investigate the terms offered by other suppliers and concluded that MediAmerica was the best for the job. In any event, there appears to be no challenge by the Office of General Counsel to the essential facts that MediAmerica provided the same or similar services to its other customers; that it extended the same or

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similar credit to its other customers in the ordinary course of its business upon terms substantially similar to those given to its nonpolitical, as well as political, customers; and, that the costs charged NCC by MediAmerica for the services were at least the normal charge for services of that type. The Federal Election Campaign Act, as interpreted by the Commission, requires no more.

A. The Record Shows that MediAmerica Billed National Candidates Committee for the Mailing Lists Used in the Solicitations

At one point, the Office of General Counsel contends that MediAmerica's extension of credit to NCC was outside the normal scope of services rendered to its clients (General Counsel's Brief at page 13). At another point, however, the Office of General Counsel concedes that MediAmerica did no more for NCC than what it - and others like it in the industry - has done for other clients. For instance, at page 8 of the General Counsel's Brief, the General Counsel observes:

> It is true that MediAmerica billed the National Candidates Committee for most ascertainable expenses and that this is standard procedure for most direct mail firms such as MediAmerica. (See Advisory Opinion 1979-36.)

But the Office of General Counsel thinks it is on to something, for the Brief continues:

> However, at least one considerable expense which MediAmerica appears to have incurred on behalf of the committee was not billed to the committee, namely the cost of renting the mailing list(s) used by MediAmerica.



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This conclusion by the Office of General Counsel apparently follows from uncertainty as to the ownership of the list used (compare Geske deposition at page 36, with Romanin deposition at pages 29-30), and Mr. Geske's failure to recall whether or not the cost of the list was billed to NCC. (Geske deposition at pages 72, 122 and 123.) It is evident elsewhere in the record, however, that MediAmerica did charge NCC for the rental of the list.

In FEC Exhibit 1 to Mr. Geske's deposition, consisting of notes which were taken at an initial planning meeting between Mr. Geske and Mr. Romanin, it is noted that "JDR" (Mr. Romanin) was charged with the responsibility of compiling the mailing list. Furthermore, Mr. Romanin testified that he believed MediAmerica had invoiced NCC for the rental of the list. (Romanin deposition at page 52.) In addition, on Schedule D of the original Report of Receipts and Disbursements, FEC Form 3X, filed by NCC for the period 10/1/80 - 11/24/80, the nature of the debt owed to MediAmerica by NCC is described as "Mailing Service, List Rental - Account Payable." (Emphasis added.) Moreover, on Schedule D of the original Report of Receipts and Disbursements, FEC Form 3X, filed by NCC for the period 11/25/80 - 12/31/80, the nature of the debt owed MediAmerica by NCC is described as "Direct Mail, Postage, List Rentals, Printing." (Emphasis added.) It is evident, therefore, that NCC was billed by MediAmerica for the rental of the mailing lists, notwithstanding the uncertainty, at times, of Messrs. Geske and Romanin as to the



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ownership of and billing for use of the lists. Such uncertainties in recollection, in the face of clear and consistent documentary evidence that the cost of the lists was billed to NCC, do not support a finding of probable cause.

B. This Proceeding, Not an Unlawful Extension of Credit, Accounts for the Nonpayment of NCC's Debt.

Finally, the Office of General Counsel suggests that the respondents should be found in violation of 2 U.S.C. 441b(a) because NCC has made no effort to repay its $12,349.52 debt to MediAmerica since January 10, 1981. The Office of General Counsel fails to advise the Commission, however, that that debt has not been paid, pending the outcome of these proceedings, on the advice of counsel.

In the deposition taken of Mr. Geske by the Office of General Counsel, one finds the following colloquies:

> Q. Why hasn't the committee contributed to any other candidates since [December 29, 1980]?
>
> A. On advice of counsel.
>
> Q. What?
>
> A. On advice of counsel. Basically not do anything until the matter is settled. Don't raise money. Don't do anything. Do as little as possible.
> [Geske deposition at pages 101-102.]
>
> * * * *
>
> Q. I refer to the fifth page of the document, marked Schedule D, Debts and Obligations, excluding loans. Can you tell me why there is still this outstanding debt figure of $12,349 if MediAmerica likes to have payment?



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A. On advice of counsel.
[Geske deposition at page 107.]

* * * *

Q. If you could be more specific as to that on advice of counsel. Are you saying that the committee should not pay the debt?

A. Oh, no. The committee should always pay the debt and I am sure will.
[Geske deposition at page 108. Emphasis added.]

The specific factual reasons why NCC was advised to take no action to pay the balance of its debt to MediAmerica are enumerated on page 5 of this Brief. Prior to the occurrence of those events, the record shows that MediAmerica promptly billed NCC for its services and expenses and that it was being paid within a commercially reasonable period of time. (See pages 5 and 6 of the General Counsel's Brief and page 4 of this Brief.) Faced, however, with the possibility of (1) a civil and/or criminal proceeding for the alleged unauthorized use of an official seal and registered trademark; (2) a criminal investigation relating to the text of its solicitations; and (3) an allegation by the Office of General Counsel that it was in violation of 2 U.S.C. 441b(b)(4)(A)(i) for having solicited contributions from a prohibited class, NCC ceased all of its fund-raising activities pending the conclusion of all three matters. It would have been foolhardy for NCC to continue its solicitation activities while the propriety of those very solicitations was under investigation and it faced the risk that such activities might result in compounding a violation of 2 U.S.C. 441b(b)(4)(A)(i). It is and always has been Mr. Geske's

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intention, as he stated on pages 102 and 108 of his deposition, that NCC will reinstitute fund-raising operations upon the conclusion of this matter and, from the proceeds of those operations, pay the balance of its debt to MediAmerica.

In conclusion, it is evident that MediAmerica rendered services to NCC that were the same, or similar to, the type of services MediAmerica rendered to its other customers. The costs for those services, including the costs of space, equipment rental, salaries, supplies, list rental and administrative services, were billed to NCC by MediAmerica at its normal rates and upon credit terms no more favorable than that extended to its nonpolitical, as well as its other political, customers. Finally, to the extent that MediAmerica has presently outstanding any unpaid invoices due it from NCC, that is due to the advice of counsel that NCC not solicit any additional contributions until this matter is resolved. Without such solicitations, NCC cannot pay what it owes to MediAmerica, for it has no other source of revenue. To suggest, as the Office of General Counsel does in its Brief, that NCC should be faulted for still owing money to MediAmerica is querulous, at best; disingenuous, at worst. The Office of General Counsel should not be permitted to point to NCC's unpaid debt to MediAmerica as evidence of an unlawful extension of credit, when the General Counsel's own investigation (and other investigations of NCC) has made the only means of repaying that debt impracticable.

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## II. NATIONAL CANDIDATES COMMITTEE IS NOT THE SEPARATE SEGREGATED FUND OF MEDIAMERICA

Mindful of the possibility that the Commission may reject its argument that respondents be found guilty for not paying off NCC's debt during the pendency of these proceedings, the Office of General Counsel alternatively recommends that NCC be found to be the separate segregated fund of MediAmerica. The arguments advanced in support of that recommendation are strained and almost overreach.

For example, the General Counsel argues that the relationship between MediAmerica and NCC "was more than" that of a vendor-vendee and cites, as "evidence," the following:

> Shirley King (former Treasurer of the National Candidates Committee) has testified that she was instructed to serve as treasurer of the committee by Geske because of the position which she held as company accountant....she has stated that she was compelled to perform the duties of treasurer of a political committee." [General Counsel's Brief at page 10. Emphasis added.]

That statement finds no support in the record. The record shows that Mrs. King willingly accepted an invitation to serve as the treasurer of NCC. Specifically, the following passage appears on pages 6 and 7 of Mrs. King's deposition:

> "Q. ...Can you identify that [an amended Statement of Organization] as the first time that you ever signed a report to the Commission for the committee?
>
> A. I believe so.
>
> Q. You are saying that from that point on there were other cases when they asked you to sign documents?
>
> A. Right.



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Q. You did so against your will or -

A. No, No. When he first asked me to do it, I said fine. Let's put it this way: 'We need a Treasurer for NRCC. Do you want to do this?' I said sure...." [Emphasis added.]

Mr. Geske also testified that he asked other MediAmerica employees if they would like to participate and that, if they said no, he would find someone else who was interested. (Geske deposition at pages 20 and 25-26. See also Romanin deposition at page 20.) Such testimony does not support the conclusion in the General Counsel's Brief that Mrs. King was "instructed" or "compelled" to serve as an officer of the committee.

At pages 10 and 11 of the General Counsel's Brief, there appears, for no apparent reason having to do with this investigation, a lengthy and irrelevant description of Mr Geske's association with individuals who happen to have a relationship with NCPAC.*/ But that is not all. There then follows this speculative, unsubstantiated and illogical conclusion on page 12 of the Brief: "Thus, there appears to have been an interest in using MediAmerica's resources to establish a political committee to assist candidates representing conservative causes." Even if that were true - and we do not for a moment concede that it is - it is not sufficient to support a finding of probable cause to believe that NCC is a separate segregated fund of MediAmerica. The deposition of Mr. Romanin is replete with averments that Mr.

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*/In this passage, "NCPAC" appears ten times and "Dolan" appears seven times, none of which is relevant to this matter.



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Geske and Mr. Romanin were aware of the laws governing corporate contributions and separate segregated funds and that they strove from the very outset - and with the advice of counsel - to avoid even the appearance of NCC's being the separate segregated fund of MediAmerica. (Romanin deposition at pages 7, 8, 15, 17, 18, 23, 93, 94 and 95.)*/

As if it proves a point bearing on this case, the Office of General Counsel reports at page 12 of its Brief: "By Geske's own admission, the committee was organized to provide for an alternative source of fund raising to the regular Republican Party machinery." That may or may not be so, but it is not evidence of a violation of the Act and has nothing to do with this matter. That observation by the General Counsel may reflect an animosity toward independent political fundraising and expenditures, but that is for Congress and not the Office of General Counsel, to address.

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*/We realize that a simple declaration, albeit under oath, that a respondent was aware of, and sought to avoid a violation of, the law is not dispositive of the issue. But Romanin is clear on this point in his deposition. Please recall that Romanin was, at the time of his deposition, no friend of Geske (Romanin deposition at page 95) and had every reason to "shade" the facts to Geske's detriment. To his credit, Romanin did not do so and stated unequivocally that Geske, not MediAmerica, was the driving force behind the founding of NCC, and that everyone concerned was scrupulous about observing the proprieties in order to avoid even the appearance of wrongdoing. It should also be recalled that, at the time of her deposition, Mrs. King was hostile to Mr. Geske. (King deposition at page 47; Geske deposition at pages 57 and 58; Romanin deposition at page 91.) Nevertheless, Mrs. King was clear that a distinction was maintained between Mediamerica and NCC.

Finally, at page 8 of the General Counsel's Brief, it is reported: "[I]t is clear that all of the day-to-day activities of the National Candidates Committee were carried out at the premises of MediAmerica and by MediAmerica employees, Richard Geske, John Romanin, Karen Dent and Shirley King." First, it is not true that all NCC activities were conducted at MediAmerica. On page 73 of Mr. Romanin's deposition, Mr. Romanin was asked: "How much time would you and Rich [Geske] put in at work on the committee itself?" Mr. Romanin's answer was: "Very, very little. Very little time. Negligible." Furthermore, as noted above, Mr. Geske testified that his in-the-office discussions with Mr. Romanin about the committee were measured, cumulatively, in "minutes." In fact, Messrs. Geske and Romanin made it a point to discuss all committee affairs outside their offices and on their own free time. (Romanin deposition at pages 16, 41 and 86; Geske deposition at page 25.) Furthermore, the Office of General Counsel fails to advise the Commission that within the MediAmerica offices a specific area was delineated for the exclusive use of NCC and NCC activities for which the committee was charged. (Romanin deposition at pages 71 and 72; Geske deposition at pages 27 and 109-111.) The committee paid rent for that space directly to the landlord on December 1, 1980 and on January 12, 1981.

It is important, in considering this matter, to keep in mind that the putative connected organization in this case is a direct mail fundraising firm. If MediAmerica were a drugstore, a



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commercial manufacturer or a nonprofit issue-oriented membership organization, the result might be different. There are many examples, however, of situations where persons associated with direct mail firms also have a direct role in the organization and operation of Federal political committees. For example, in MUR 297, the Committee for Responsible Youth Politics was found not to be connected to The Viguerie Company even though the connection between the two was closely parallel to the one at hand. Another example is the Progressive Political Action Committee, or PROPAC, and its relationship with Mr. Victor Kamber and the direct mail firm known as The Kamber Group. In the July 14, 1982 edition of The Baltimore Sun it is reported that, like NCC, PROPAC was organized by political activists associated with a direct mail firm:

> Lending an even more striking aspect to PROPAC is the fact that the private business most deeply imbedded in its operation is The Kamber Group, a two-year old Washington public-relations firm with a growing direct-mail advertising arm.
>
> * * * *
>
> As Mr. Kamber acknowledges, PROPAC is not only the brainchild of a respected political activist [Mr. Kamber] long identified with the labor movement, but also of a hustling public-relations man [Mr. Kamber] with direct mail fund-raising expertise.

Furthermore, like MediAmerica, The Kamber Group handles all the fund raising and administrative chores for PROPAC:

> The Kamber Group, headed by Mr. Kamber, houses PROPAC at its suite of offices in a downtown Washington high rise. The firm also collects and counts PROPAC's contributions and



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pays many of its bills, for which the company is reimbursed.

* * * *

In addition, his private firm sends out the letters. The money that comes in moves first through his company before reaching the PAC. Some of the money makes its way to private vendors via the same route.... [The Baltimore Sun, July 14, 1982.]

The vendor-vendee relationship between The Kamber Group and PROPAC also has a striking similarity to the relationship between MediAmerica and NCC:

[Mr. Kamber] also says that he and The Kamber Group have gone to extraordinary lengths to avoid making money from PROPAC, accepting essentially a token $1,000 monthly fee for services to avoid entanglements with federal election law. That law forbids in-kind as well as monetary corporate contributions in connection with federal elections.

The only other PROPAC money that goes to him or his firm, he says, is reimbursement for such things as phone bills, messengers and delivery services because there is "no way to separate the bills."

FEC reports covering the period January, 1981, to March, 1982, show payments totaling a modest $13,608 to The Kamber Group but none to Mr. Kamber himself. He says he accepts no pay for his efforts on behalf of PROPAC. [Id.]

Finally, almost like a reflection of the relationship between Mr. Geske and NCC, The Baltimore Sun reports, "For all practical purposes, PROPAC begins and ends with Victor Kamber." [Id.]

In its brief, the Office of General Counsel relied upon the same series of articles in The Baltimore Sun in an effort to tie MediAmerica to NCPAC. (General Counsel's Brief at page



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11.) The General Counsel failed to note, however, the more relevant and conspicuous parallelisms between MediAmerica and The Kamber Group, on the one hand, and NCC and PROPAC, on the other.

In light of the foregoing, the Commission is encouraged to make its own careful analysis of the complete record. As noted above, Mr. Geske and Mr. Romanin are political activists who hoped to play a more direct role in the political process. Mr. Romanin testified that he and Mr. Geske "had dealt with enough PACs" to know the distinction between separate segregated funds and independent committees and that NCC was not meant to be a separate segregated fund. (Romanin deposition at pages 7, 8 and 93-94.) Thus, they knew the rules and they played by those rules. They discussed the committee, its formation and its operation, outside the office and on their free time. Mr. Geske invited - he did not instruct or compel - others to participate. Mr. Geske did not present the matter to the Board of Directors of MediAmerica, because he wanted NCC to be independent. (Mr. Geske testified, on pages 6 and 7 of his deposition, that he believes Board approval is necessary to establish a separate segregated fund.) To the contrary, Mr. Geske engaged MediAmerica to provide the same service to NCC that it provides to numerous other political and non-political clients and upon the same terms and conditions. MediAmerica was careful to delineate space on a floor plan for the exclusive use of NCC. MediAmerica billed NCC for that space, for its separate telephone and for all other identifiable expenses.

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The conclusions are clear. MediAmerica did not establish NCC; Mr. Geske did. MediAmerica did not administer NCC; Mr. Geske and Mr. Romanin did so on their free time. MediAmerica did not finance or unlawfully extend credit to NCC, NCC was billed for all the services rendered to NCC and for all its identifiable expenses. The reasons some of those bills are still unpaid have been explained at length. NCC is not the separate segregated fund of MediAmerica.

For the reasons stated, the record does not support a finding of probable cause to believe that MediAmerica or Mr. Geske unlawfully extended credit to NCC and it does not support a finding of probable cause to believe that NCC is the separate segregated fund of MediAmerica.

Respectfully submitted,

SEDAM & HERGE, P.C.
8300 Greensboro Drive
McLean, Virginia 22102
(703) 821-1000

By: J. Curtis Herge

By: Robert R. Sparks, Sr.

Attorneys for Respondents

January 6, 1983

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**SEDAM & HERGE**
ATTORNEYS AT LAW
SUITE 1100
8300 GREENSBORO DRIVE
McLEAN, VIRGINIA 22102

*To*

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

**FIRST CLASS MAIL**

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 15, 1982

J. Curtis Herge, Esquire
Sedam & Herge
Suite 1100
8300 Greensboro Drive
McLean, Virginia 22102

Re: MUR 1363

Dear Mr. Herge:

This letter is in response to your request dated December 8, 1982, for an extension of time to prepare a responsive brief in the above-captioned matter. Your request is hereby granted. Please submit your response no later than January 7, 1982.

Should you have any further questions, please contact Stephen Mims at 523-4039.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

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WASHINGTON, D.C. 20006
(703) 821-1000

TELEX: 710-831-0896

CABLE: SEDAMHERGE


December 8, 1982

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

Attention: Stephen Mims, Esq.

Re: MUR 1363

Dear Mr. Steele:

By letter dated November 26, 1982, you reported that the Office of General Counsel is prepared to recommend that the Federal Election Commission find probable cause to believe that the respondents in the above-captioned matter are in violation of certain provisions of the Federal Election Campaign Act of 1971, as amended. Enclosed with your letter, which was received in this office on December 1, 1982, was a copy of the General Counsel's Brief. On December 8, 1982, we were authorized by our clients to prepare a responsive brief.

In light of the delay in receiving authority to proceed and in light of the forthcoming holidays, we respectfully requested an extension to January 7, 1982 within which to file our brief.

Sincerely,

J. Curtis Herge

J. Curtis Herge

8304043496

SEBAN & HERGE
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
SUITE 1100
8300 GREENSBORO DRIVE
MCLEAN, VIRGINIA 22102

NORTHERN VIRGINIA, VA 220
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Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Attention: Stephen Mims, Esq.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 26, 1982

Mr. J. Curtis Herge, Esquire
Sedam & Herge
8300 Greensboro Drive
McLean, VA 22102

Re: MUR 1363

Dear Mr. Herge:

Based on a complaint filed with the Commission on January 16, 1981, and information supplied by you, the Commission determined on July 14, 1981 that there was reason to believe that your clients had violated the Federal Election Campaign Act of 1971, as amended. Specifically, the Commission determined that there was reason to believe (1) MediaAmerica, Inc. violated 2 U.S.C. §§ 441b(a) and 441b(b)(4)(A)(i); (2) Richard Geske violated 2 U.S.C. § 441b(a); and (3) the National Candidates Committee (formerly the National Republican Candidates Committee) violated 2 U.S.C. §§ 432(e)(5), 433(c), 433(b)(2), 441b(a) and 441b(b)(4)(A)(i). Accordingly the Commission instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible.

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The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

Should you have any questions, please contact Stephen Mims at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 26, 1982

**MEMORANDUM**

TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: MUR 1363

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondents of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on November 26, 1982. Following receipt of the respondents' reply to this notice, this Office will make a further report to the Commission.

Attachments
1. Brief
2. Letter to respondents

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**BEFORE THE FEDERAL ELECTION COMMISSION**

| | | |
|---|---|---|
| In the Matter of<br><br>The National Candidates Committee, MediaAmerica, Inc, Richard Geske | ) | MUR 1363 |

**GENERAL COUNSEL'S BRIEF**

I. **Statement of the Case**

This matter was brought to the attention of the Commission by a complaint filed by the National Republican Senatorial Committee, et. al., on January 16, 1981. That complaint set forth alternative arguments:

1. MediaAmerica, Inc., a Virginia based direct mailing firm, is the connected organization of the National Candidates Committee which is, therefore, MediaAmerica's separate segregated fund. Accordingly, MediaAmerica and the National Candidates Committee violated the Act by making communications to and soliciting contributions from individuals other than MediaAmerica's executive and administrative personnel, stockholders and their families. 2 U.S.C. §§ 441b(a) and 441b(b)(4)(A)(i). Furthermore, the National Candidates Committee, by failing to indicate this relationship in its name and on its Statement of Organization violated §§ 432(e)(5) and 433(b)(2).

2. Alternatively, the complaint suggested that if MediaAmerica is found not to have been the connected organization of the National Candidates Committee (and

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the National Candidates Committee was not its separate segregated fund), then MediaAmerica violated the Act by financing the activities of the National Candidates Committee by subsidizing its overhead expenses and by extending credit to the National Candidates Committee in a manner inconsistent with the provisions of the Act. 2 U.S.C. § 441b(a). Richard Geske, as a result of his position and involvement with MediaAmerica and the National Candidates Committee, is alleged to have violated the Act in his capacity as an officer and director of MediaAmerica by consenting to MediaAmerica's activities in contravention of the Act.

Numerous other violations were alleged which deal with reporting inconsistencies:

1. The committee's first treasurer, Karen Dent, failed to sign reports submitted by the committee, 2 U.S.C. § 434(a)(1), and failed to properly identify the relationship between MediaAmerica and the National Candidates Committee.

2. John Romanin violated 18 U.S.C. § 1001 by signing committee reports as treasurer when he was not treasurer or, in the alternative, if he was treasurer he failed to properly amend the committee's statement of organization to reflect that fact. 2 U.S.C. § 433(c).

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The Commission, on July 14, 1981, found that there was reason to believe that MediaAmerica violated 2 U.S.C. §§ 441b(a) and 441b(b)(4)(A)(i) on the ground that it appeared to be the connected organization of the National Candidates Committee. The Commission also found reason to believe the National Candidates Committee violated 2 U.S.C. §§ 432(e)(5), 433(c), 433(b)(2), 441b(a) and 441b(b)(4)(A)(i) on the basis that it appeared to be the separate segregated fund of MediaAmerica. In addition, the Commission found reason to believe that Richard Geske violated 2 U.S.C. § 441b(a) by consenting to impermissible corporate expenditures.

The Commission's action was based upon the consideration of a combination of circumstances, namely (1) MediaAmerica, Inc., by the authority of its President and Director, Richard Geske, 1/ and its Vice President, John Romanin, 2/ extended a large amount of credit for services rendered to the National Candidates Committee (formerly known as the National Republican Candidates Committee); (2) the National Candidates Committee shared office space with and was entirely operated by employees of MediaAmerica, Inc.; (3) by the authority of Richard Geske and John Romanin, the National Candidates Committee solicited contributions from persons other than MediaAmerica's

1/ He was at the same time chairman of the National Candidates Committee.
2/ He was at the same time treasurer of the National Candidates Committee.

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executive and administrative personnel, stockholders and their families; (4) all of the committee's decisions were made by Richard Geske and/or John Romanin and (5) no persons, other than employees of MediaAmerica, participated in the day to day decision-making process of the National Candidates Committee.

The National Candidates Committee filed its Statement of Organization with the Commission on June 30, 1980. Geske testified the idea was first discussed during the summer of 1980. The discussions were joined by, among others, John Romanin, Terry Dolan and Rhonda Stahlman and at times took place at MediaAmerica's offices. The purpose of forming the National Candidates Committee, according to Geske was to form another political committee to effectively counter the effects of proposed legislation directed towards reducing the contribution limitations of political committees. See Geske deposition at pages 9 - 10. Although no formal board resolution was passed by MediaAmerica authorizing the formation of the National Candidates Committee, the decision to establish the committee was made entirely by MediaAmerica officers or employees.

The solicitations carried out by MediaAmerica on the National Candidate Committee's behalf consisted of at least two efforts. The second effort was conducted as a post general election attempt to raise funds to retire the debts of certain specific candidates (without their prior consent or approval). MediaAmerica directed these solicitations to persons included on a mailing list (numbering perhaps as many as 12,000) who had no

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apparent relationship with MediaAmerica, Inc. These names were contained in a list possessed by MediaAmerica. Ownership of the list is uncertain, as Geske contends that the list was held by Romanin (Geske deposition at page 36), while Romanin asserts that any list used by MediaAmerica for this purpose was obtained by the company either through its own efforts or by rental from another firm. Romanin deposition at pages 29-30.

The entire operation of the National Candidates Committee was carried out by MediaAmerica employees Karen Dent and later Shirley King (both of whom served as treasurer), who filed and signed the reports, batched and deposited contributions. (Although the records were created by these persons, according to Ms. King, they were then personally maintained by Mr. Geske). The National Candidates Committee's Statement of Organization appears to indicate that their bank account was opened in the name of the committee by Karen Dent, then the bookkeeper for MediaAmerica, Inc. One phone line was added to MediaAmerica's phone system and was designed as the committee's. A file drawer in a conference room at MediaAmerica was set aside for the National Candidates Committee's records.

The expenses of the National Candidates Committee were initially incurred by MediaAmerica and then billed to the National Candidates Committee. The first billing was made on October 27, 1980, for the production and mailing of 8,778 "Urgent Grams" together with amounts necessary for the reimbursement of general overhead costs in the amount of $ 9,305.92. A payment

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of $ 5,564.80 was made by the National Candidates Committee on December 1, 1980. Subsequent billings were made by MediaAmerica, Inc. on November 18, and 26, 1980, as well as during December, 1980 which totaled $ 10,608.10. The National Candidates Committee made a payment of $ 2,000 on January 10, 1981. Thus, since January 10, 1981, the $ 12,349.52 balance owed by the National Candidates Committee has been outstanding. MediaAmerica appears not to have included in its billings a fee for the usage of any mailing list.

Responding to the Commission finding, respondents admitted that they failed to amend the Statement of Organization to reflect the change in treasurer, 2 U.S.C. § 433(c), but denied any finding that MediaAmerica is the connected organization of National Candidates Committee or that National Candidates Committee is the separate segregated fund of MediaAmerica. Respondents contended that to reach such a conclusion would lead "to an absurd result" because Mr. Geske was aware that "a political action committee of a corporation is severely limited in from whom it may solicit contributions." Respondents pointed to the fact that MediaAmerica has only "one individual stockholder [Richard Geske] and approximately six executive or administrative personnel on its staff." 3/

3/ It should be noted that in addition to Richard Geske, counsel for respondents, J. Curtis Herge, is also a Director of MediaAmerica. Geske relied upon the advice of counsel (Mr. Herge) prior to forming the National Candidates Committee. This may explain his assertion that he was aware of the law.

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Respondents acknowledged that MediaAmerica rendered services to the National Candidates Committee but contended that the relationship between the two entities was that of vendor-vendee rather than that of connected organization - separate segregated fund.

## II. Legal Analysis

The term "connected organization" is defined at 2 U.S.C. § 431(7) as "any organization which is not a political committee but which directly or indirectly establishes, administers, or financially supports a political committee." The Commission's regulations further specify that "the term 'financially supports' does not include contributions to the political committee but does include the payment of establishment, administration and solicitation costs of such committee." 11 C.F.R. § 100.6(c).

As noted supra, although MediaAmerica did not pass a formal resolution to create the National Candidates Committee as its separate segregated fund, its officers or employees acting within the scope of their authority, arranged for the formation of the National Candidates Committee and authorized MediaAmerica to incur the initial expenses of the National Candidates Committee. The only persons who had any direct responsibility for the

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affairs of the National Candidates Committee were employed by MediaAmerica or acting as one of its officers or directors. Therefore, it appears that MediaAmerica indirectly "established" the National Candidates Committee withing the meaning of 2 U.S.C. § 431(7).

With regard to the administration of the National Candidates Committee, it is clear that all of the day to day activities of the National Candidates Committee were carried out at the premises of MediaAmerica and by MediaAmerica employees Richard Geske, John Romanin, Karen Dent and Shirley King.

Finally, as to financial support of the National Candidates Committee, it is clear that MediaAmerica's initial extension of credit assisted the National Candidates Committee. It is true that MediaAmerica billed the National Candidates Committee for most ascertainable expenses and that this is standard procedure for most direct mail firms such as MediaAmerica. 4/ However, at least one considerable expense which MediaAmerica appears to have incurred on behalf of the committee was not billed to the committee, namely the cost of renting the mailing list(s) used by MediaAmerica.

No effort appears to have been made to explore whether any other direct mail firm could provide better or cheaper services to the National Candidates Committee. Respondent Geske, in testimony provided during the investigation of this matter, admitted that the rates for services offered by other

4/ See Advisory Opinion 1979-36.

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organizations were not sought as he knew that MediaAmerica was the best. See Geske deposition at page 31. Respondent Romanin indicated that he believed that Geske sought comparative bids from other firms and stated that he believed at the time of the organization of the National Candidates Committee that utilizing the services of MediaAmerica would possibly contravene the Act's prohibitions. See Romanin deposition at pages 11 and 12.

Respondents contend that any acts by Geske to organize or control the National Candidates Committee were beyond the scope of his corporate duties and hence ultra vires. 5/ Accordingly, they argue that the formation of the committee cannot be attributed to the corporation. Geske was, however, the President, Chairman and sole stockholder of MediaAmerica, and it appears from the investigation that Geske's acts were never questioned by the Board of Directors because they believed the relationship to be legal. Geske (as noted above) even indicated that he had discussed this matter with J. Curtis Herge, a director of MediaAmerica.

The notion that the relationship between MediaAmerica and the National Candidates Committee was more than just vendor-vendee is evidenced by the fact that regular employees of MediaAmerica were called upon to serve as

5/ Response to reason to believe notification, July 30, 1981, page six.

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officers of the National Candidates Committee. Shirley King (former Treasurer of the National Candidates Committee) has testified that she was instructed to serve as treasurer of the committee by Geske because of the position which she held as company accountant. Although she allocated her time for performing services for National Candidates Committee, she has testified that on numerous occasions she objected to performing National Candidates Committee duties. Respondents claimed, however, that King's responsibilites as treasurer were merely part of the services which MediaAmerica offered its client, the National Candidates Committee. Although King apparently never was solicited by National Candidates Committee, she has stated that she was compelled to perform the duties of treasurer of a political committee.

The background of the National Candidates Committee and MediaAmerica gives further support for the proposition that MediaAmerica was the driving force in the establishment of the National Candidates Committee and that the plan was to use the resources of MediaAmerica to assist in political electioneering. At the time of the formation of the National Candidates Committee, numerous personal acquaintances of Geske were called upon to make initial contributions to National Candidates Committee. Among those persons were:

1. R.K. Stahlman, Secretary of MediaAmerica, member Board of Directors of NCPAC.

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2. Maiselle Shortley, Vice President and Director of MediaAmerica, sister of NCPAC Executive Director Terry Dolan, presently employed as secretary to Morgan Blackwell who was formerly associated with Richard Viguerie and is now special assistant to the President.

3. John T. Dolan, Exec. Director of NCPAC, former member of MediaAmerica Board. 5/

4. Mr. Curt Clinkscales, associated with CLCO, Inc., which handles direct mail for the National Conservative Foundation, a NCPAC affiliate.

Each of these persons, including Geske, has had at least some substantial relationship with NCPAC.- Mr. Dolan has publicly acknowledged that MediaAmerica was originally a NCPAC spin-off, the product of an idea he had to cut costs for his organization and for other conservative groups. 6/ The NCPAC state affiliate, NCPAC-SEF was initially a 50% shareholder in MediaAmerica. Mr. Dolan has further indicated that in addition to trimming costs for such sevices as direct mail advertising and media buys, the plan was to funnel NCPAC-SEF's portion of any profits to conservative candidates in states where corporate contributions are permitted. Some conflict appears to have arisen, however between Dolan and Geske which resulted in Geske's purchase of NCPAC-SEF's 50% interest in MediaAmerica.

5/ This relationship, according to Mr. Dolan's interview in the Baltimore Sun on July 13, 1982, terminated prior to the formation of the National Candidates Committee.

6/ The Baltimore Sun, Tuesday, July 13, 1982.

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Thus, there appears to have been an interest in using MediaAmerica's resources to establish a political committee to assist candidates representing conservative causes. By Geske's own admission, the committee was organized to provide for an alternative source of fund raising to the regular Republican Party machinery.

The circumstances presented thus lead to two possible results. The first alternative is that regardless of whether respondents intended to establish the National Candidates Committee as a separate segregated fund, it was, by way of its creation and closeness to MediaAmerica, a separate segregated fund in fact. The second alternative would be to view MediaAmerica's activity of effectively subsidizing the National Candidates Committee's political efforts as constituting corporate expenditures.

We recommend that the Commission make alternative probable cause findings using both theories. Because MediaAmerica, Inc., directly or indirectly established, administered, and financially supported the National Candidates Committee we recommend that the Commission find probable cause to believe that MediaAmerica, Inc. and the National Candidates Committee violated 2 U.S.C. § 441b(b)(4)(A)(i) in connection with the communications/ solicitations for the National Candidates Committee beyond the executive and administrative personnel and stockholders of MediaAmerica, Inc., and that the National Candidates Committee violated 2 U.S.C. § 433(b)(2) for its failure to list

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MediaAmerica, Inc., as its connected organization and 2 U.S.C. § 432(e)(5) for its failure to include "MediaAmerica" in its name. In addition, because the relationship between MediaAmerica, Inc., and the National Candidates Committee does not appear to be a bona fide vendor-vendee situation, we recommend that the Commission find, in the alternative, probable cause to believe that both violated 2 U.S.C. § 441b(a) in connection with MediaAmerica's subsidation of the committee's expenses. The extension of credit by MediaAmerica, Inc., to the National Candidates Committee appears to be outside the ordinary course of its business and therefore outside the exemption from § 441b(a) set forth at 11 C.F.R. § 114.10(a). First, MediaAmerica's officials appear to have established and controlled the National Candidates Committee; thus we are not presented with a situation whereby an independently organized and controlled group came to MediaAmerica to procure services on an arm's length basis. Second, the background behind MediaAmerica's own formation suggests that it was designed to utilize the corporate assets (including its ability to extend credit) to assist certain conservative groups by cutting their direct mail costs. This does not suggest a normal vendor-vendee realtionship. Third, the authority that MediaAmerica, Inc., exercised over the National Candidates Committee resulted in the latter not making any effort to repay the $ 12,349.52 debt outstanding since January 10, 1981. This too undercuts respondents' argument that a normal vendor-vendee situation existed.

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III. **Recommendations**

1. Find probable cause to believe that MediaAmerica, Inc., and the National Candidates Committee violated 2 U.S.C. § 441b(b)(4)(A)(i) in connection with the communications/ solicitations for the National Candidates Committee beyond the stockholders and executive and administrative personnel of MediaAmerica, Inc., or their families and that the National Candidates Committee violated 2 U.S.C. § 433(b)(2) for its failure to list MediaAmerica, Inc., as its connected organization and 2 U.S.C. § 432(e)(5) for its failure to include "MediaAmerica" in its name.

2. Find probable cause to believe, in the alternative, that MediaAmerica, Inc., violated 2 U.S.C. § 441b(a) by extending credit to the National Candidates Committee and that the National Candidates Committee violated 2 U.S.C. § 441b(a) by knowingly accepting such credit.

2. Find probable cause to believe that Richard Geske violated 2 U.S.C. § 441b(a) by consenting to MediaAmerica's extension of credit to the National Candidates Committee.

26 November 1982

Date

Charles N. Steele
General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 26, 1982

Mr. J. Curtis Herge, Esquire
Sedam & Herge
8300 Greensboro Drive
McLean, VA 22102

Re: MUR 1363

Dear Mr. Herge:

Based on a complaint filed with the Commission on January 16, 1981, and information supplied by you, the Commission determined on July 14, 1981 that there was reason to believe that your clients had violated the Federal Election Campaign Act of 1971, as amended. Specifically, the Commission determined that there was reason to believe (1) MediaAmerica, Inc. violated 2 U.S.C. §§ 441b(a) and 441b(b)(4)(A)(i); (2) Richard Geske violated 2 U.S.C. § 441b(a); and (3) the National Candidates Committee (formerly the National Republican Candidates Committee) violated 2 U.S.C. §§ 432(e)(5), 433(c), 433(b)(2), 441b(a) and 441b(b)(4)(A)(i). Accordingly the Commission instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible.

8 3 0 4 0 4 3 4 8 7 3

Attachment 2

Page 1

The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

Should you have any questions, please contact Stephen Mims at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

8 3 0 4 0 4 3 4 8 7 4

Attachment 2
Page 2

November 26, 1982

MEMORANDUM TO: Marjorie W. Emmons

FROM: Phyllis A. Kayson

SUBJECT: MUR 1363

Please have the attached Memo and Brief distributed to the Commission on an informational basis. Thank you.

Attachment

cc: Mims

8 3 0 4 0 4 3 4 8 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE

FROM: MARJORIE W. EMMONS/JODY C. RANSOM jcr

DATE: OCTOBER 5, 1982

SUBJECT: MUR 1363 - Comprehensive Investigative Report #2, signed September 30, 1982; Received in OCS, 10-1-82, 12:37

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 11:00, October 4, 1982.

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

83040434876

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

82 OCT 1 PM 2: 37

| | | |
|---|---|---|
| In the Matter of | ) | |
| | ) | |
| National Candidates Committee, *et al.* | ) | MUR 1363 |
| | ) | |

**COMPREHENSIVE INVESTIGATIVE REPORT #2**

This matter involves the National Candidates Committee (formerly known as the National Republican Candidates Committee), MediaAmerica, Inc. (a corporation with which the committee is allegedly connected) and two of MediaAmerica's officers, Richard Geske (President and sole stockholder) and John Romanin (former Vice-President). The issue is whether the relationship between MediaAmerica and the National Candidates Committee is such that MediaAmerica would be considered in fact the connected organization of the National Candidates Committee and the committee the separate segregated fund of MediaAmerica. Respondents by way of materials submitted to this Office and in depositions taken during the investigation of this matter, have asserted that the relationship is more properly viewed as vendor-vendee.

8 3 0 4 0 4 3 4 8 7 7

This office has completed the review of the last of the corrected transcripts (which was received on September 13, 1982) and is presently preparing a brief which we expect to circulate to the Commission within the next two weeks.

Charles N. Steele
General Counsel

Sept. 30, 1982
Date

By: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

8304043487 8

October 1, 1982

MEMORANDUM TO: Marjorie W. Emmons

FROM: Phyllis A. Kayson

SUBJECT: MUR 1363

Please have the attached Comprehensive Investigative Report #2 distributed to the Commission on a 24 hour no-objection basis. Thank you.

Attachment

cc: Mims

3 3 0 4 0 4 3 4 8 7

MEMORANDUM FOR THE FILE MUR 1363

FROM: MIMS SM 6/10/82

SUBJECT: SUBPOENA TO HAL STALVIK

The subpoena addressed to Hal Stalvik which was returned to the Commission undeliverable as addressed should be placed in the original file. At this time there is no need to continue to make additional efforts to reach Mr. Stalvik as it appears that his testimony will not be necessary in this matter.

##

83040434830

EDERAL ELECTION COMMISSION
VASHINGTON,D.C. 20463

Official Business
Penalty for Private Use $300

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WASHINGTON, DC 20001
-PM
5 MAY
1982

POSTAGE AND FEES PAID

RETURNED TO SENDER
ATTEMPTED
UNKNOWN

Mr. H[illegible]
1514 Rhode Island Avenue, N.W.
Washington, DC 20005

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 5, 1982

Ms. Karen Tandy
Assistant United States Attorney
117 South Washington Street
Alexandria, VA 22314

Re: National Republican
Candidates Committee
MUR 1363

Dear Ms. Tandy:

In January, 1981, the Federal Election Commission began an investigation of allegations that the National Republican Candidates Committee (now known as the National Candidates Committee) violated certain provisions of the Federal Election Campaign Act of 1971, as amended (Matter Under Review #1363).

During its investigation, the Commission has become aware of an investigation conducted by the United States Postal Service of matters which were presented before a Grand Jury. A review of materials supplied by counsel for the National Candidates Committee and conversation between this Office and Mr. Fisher of the U.S. Postal Service, indicate that some issues raised in the Postal Service's investigation may also involve matters before the Commission (e.g. a possible violation of 2 U.S.C. § 441d which requires, inter alia, that certain statements appear on solicitations made in the name of a candidate for federal office which are not authorized by the candidate).

Accordingly we request that you make available to the Commission whatever material you or the U.S. Postal Service might have regarding the investigation of the National Candidates Committee other than that material subject to the provisions of Rule 6(e) of the Federal Rules of Criminal Procedure.

Thank you for your assistance in this matter. If you should have any questions regarding this request please contact Stephen Mims, the staff member assigned to this matter at 532-4060.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A Gross
Associate General Counsel

8 3 0 4 0 4 3 4 8 3 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 5, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Hal Stalvik
1514 Rhode Island Avenue, N.W.
Washington, DC 20005

Re: MUR 1363

Dear Mr. Stalvik:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. In accordance with an investigation being conducted by the Commission, it has issued the attached subpoena which requires you to appear as a witness and give sworn testimony on May 19, 1982, and to produce certain documents.

Since your testimony is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section of the Act prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is being made.

You may consult an attorney who may assist you in submitting the documents and accompany you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid $30, plus mileage at the rate of 22.5 cents per mile. You will be given a check for the appropriate amount at the time of your deposition.

3 3 0 4 0 4 3 4 8 3 2

Please confirm your scheduled appearance with Stephen Mims at (202)523-4060 within ten days of your receipt of this notification. I you have any questions, please direct them to Mr. Mims, the staff member assigned to this matter.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena to Appear for Deposition and to Produce Documents

83040434834

UNITED STATES OF AMERICA

BEFORE THE FEDERAL ELECTION COMMISSION

Subpoena to Appear For Deposition and Produce Documents

TO: HAL STALVIK

Re: Matter Under Review 1363

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition as a witness with regard to the matter of MediaAmerica, Inc., and the National Candidates Committee (formerly known as the National Republican Candidates Committee), et. al. On June 29, 1981, the Commission found reason to believe that the Committee violated 2 U.S.C. §§ 433(b)(2), 433(c), 432(e)(5), and 441b(b)(4)(A)(i), that MediaAmerica, Inc. violated 2 U.S.C. §§ 441b(a) and 441b(b)(4)(A)(i), and that Richard Geske, President of MediaAmerica, Inc. violated 2 U.S.C. § 441b(a). Notice is hereby given that the deposition will be taken at 1325 K. Street, N.W., Washington, D.C., begining on May 19, 1982 at 2:00 p.m. and continuing each day thereafter as necessary.

8 3 0 4 0 4 3 4 8 3 5

Pursuant to section 437d of Title 2, United States Code, you are further hereby subpoenaed to produce on the same day any and all documents in your possession or control which relate to the establishment, financing, and administering of the National Candidates Committee.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., this 29th day of March, 1982.

Frank P. Reiche

Frank P. Reiche
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

8 3 0 4 0 4 3 4 8 3 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 5, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re: MUR 1363

Ms. Tere Linehan
1515 South Jefferson Davis Highway
Arlington, VA 22202

Dear Ms. Linehan:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. In accordance with an investigation being conducted by the Commission, it has issued the attached subpoena which requires you to appear as a witness and give sworn testimony on May 19 , 1982, and to produce certain documents.

Since your testimony is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section of the Act prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is being made.

You may consult an attorney who may assist you in submitting the documents and accompany you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid $30, plus mileage at the rate of 22.5 cents per mile. You will be given a check for the appropriate amount at the time of your deposition.

8 3 0 4 0 4 3 4 8 3 7

Please confirm your scheduled appearance with Stephen Mims at (202)523-4060 within ten days of your receipt of this notification. If you have any questions, please direct them to Mr. Mims, the staff member assigned to this matter.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena to Appear for Deposition and to Produce Documents

83040434396

UNITED STATES OF AMERICA

BEFORE THE FEDERAL ELECTION COMMISSION

**Subpoena to Appear For Deposition and Produce Documents**

TO: TERE LINEHAN

Re: Matter Under Review 1363

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition as a witness with regard to the matter of MediaAmerica, Inc., and the National Candidates Committee (formerly known as the National Republican Candidates Committee), et. al. On June 29, 1981, the Commission found reason to believe that the Committee violated 2 U.S.C. §§ 433(b)(2), 433(c), 432(e)(5), and 441b(b)(4)(A)(i), that MediaAmerica, Inc. violated 2 U.S.C. §§ 441b(a) and 441b(b)(4)(A)(i), and that Richard Geske, President of MediaAmerica, Inc. violated 2 U.S.C. § 441b(a). Notice is hereby given that the deposition will be taken at 1325 K. Street, N.W., Washington, D.C., begining on May 19 , 1982 at 10:00 a.m. and continuing each day thereafter as necessary.

8 3 0 4 0 4 3 4 8 8 3

Pursuant to section 437d of Title 2, United States Code, you are further hereby subpoenaed to produce on the same day any and all documents in your possession or control which relate to the establishment, financing, and administering of the National Candidates Committee.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., this 29th day of March, 1982.

Frank P. Reiche

Frank P. Reiche
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

8304043489 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 5, 1982

**CERTIFIED MAIL**
**RETURN RECEIPT REQUESTED**

Re: MUR 1363

Mr. Wayne A. Brill
5840 Cameron Run Terrace
Alexandria, VA 22303

Dear Mr. Brill:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. In accordance with an investigation being conducted by the Commission, it has issued the attached subpoena which requires you to appear as a witness and give sworn testimony on May 20 , 1982, and to produce certain documents.

Since your testimony is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section of the Act prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is being made.

You may consult an attorney who may assist you in submitting the documents and accompany you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid $30, plus mileage at the rate of 22.5 cents per mile. You will be given a check for the appropriate amount at the time of your deposition.

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Please confirm your scheduled appearance with Stephen Mims at (202)523-4060 within ten days of your receipt of this notification. If you have any questions, please direct them to Mr. Mims, the staff member assigned to this matter.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena to Appear for Deposition and to Produce Documents

8304043489 2

UNITED STATES OF AMERICA

BEFORE THE FEDERAL ELECTION COMMISSION

**Subpoena to Appear For Deposition and Produce Documents**

TO: WAYNE A. BRILL

Re: Matter Under Review 1363

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition as a witness with regard to the matter of MediaAmerica, Inc., and the National Candidates Committee (formerly known as the National Republican Candidates Committee), et. al. On June 29, 1981, the Commission found reason to believe that the Committee violated 2 U.S.C. §§ 433(b)(2), 433(c), 432(e)(5), and 441b(b)(4)(A)(i), that MediaAmerica, Inc. violated 2 U.S.C. §§ 441b(a) and 441b(b)(4)(A)(i), and that Richard Geske, President of MediaAmerica, Inc. violated 2 U.S.C. § 441b(a). Notice is hereby given that the deposition will be taken at 1325 K. Street, N.W., Washington, D.C., begining on May 20 , 1982 at 10:00 a.m. and continuing each day thereafter as necessary.

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Pursuant to section 437d of Title 2, United States Code, you are further hereby subpoenaed to produce on the same day any and all documents in your possession or control which relate to the establishment, financing, and administering of the National Candidates Committee.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., this 29th day of March, 1982.

Frank P. Reiche

Frank P. Reiche
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

8304043489

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 5, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J. Curtis Herge, Esquire
Sedam and Herge
8300 Greensboro Drive
McLean, VA. 22102

Re: MUR 1363

Dear Mr. Herge:

On July 20, 1981, you received notification that the Commission had found reason to believe that your clients, MediaAmerica, Inc., the National Candidates Committee, and Richard Geske, had violated the Federal Election Campaign Act of 1971, as amended. On February 22, 1982, you were served a subpoena for the production of certain records pertaining to the Commission's investigation of this matter which was due on March 12, 1982. That deadline was extended, per your request, to March 26, 1982. Examination of other information available to the Commission has led it to determine that additional information is necessary. Consequently, the Federal Election Commission has issued the attached subpoenas which require that your clients, Richard Geske, and John D. Romanin appear to answer questions which will assist the Commission in carrying out its statutory duty of supervising compliance with the Act.

If you have any questions, please direct them to Stephen Mims, the staff member handling this matter, at (202)523-4060.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena

8304043489

UNITED STATES OF AMERICA

BEFORE THE FEDERAL ELECTION COMMISSION

Subpoena to Appear For Deposition and Produce Documents

TO: RICHARD GESKE

Re: Matter Under Review 1363

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition as a witness with regard to the matter of MediaAmerica, Inc., and the National Candidates Committee (formerly known as the National Republican Candidates Committee), et. al. On June 29, 1981, the Commission found reason to believe that the Committee violated 2 U.S.C. §§ 433(b)(2), 433(c), 432(e)(5), and 441b(b)(4)(A)(i), that MediaAmerica, Inc. violated 2 U.S.C. §§ 441b(a) and 441b(b)(4)(A)(i), and that Richard Geske, President of MediaAmerica, Inc. violated 2 U.S.C. § 441b(a). Notice is hereby given that the deposition will be taken at 1325 K. Street, N.W., Washington, D.C., begining on May 24 , 1982 at 10:00 a.m. and continuing each day thereafter as necessary.

8 3 0 4 0 4 3 4 8 9 6

Pursuant to section 437d of Title 2, United States Code, you are further hereby subpoenaed to produce on the same day any and all documents in your possession or control which relate to the establishment, financing, and administering of the National Candidates Committee.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., this 29th day of March, 1982.

Frank P. Reiche

Frank P. Reiche
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

6 3 0 4 0 4 3 4 8 9 7

UNITED STATES OF AMERICA

BEFORE THE FEDERAL ELECTION COMMISSION

**Subpoena to Appear For Deposition and Produce Documents**

TO: JOHN D. ROMANIN

Re: Matter Under Review 1363

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition as a witness with regard to the matter of MediaAmerica, Inc., and the National Candidates Committee (formerly known as the National Republican Candidates Committee), et. al. On June 29, 1981, the Commission found reason to believe that the Committee violated 2 U.S.C. §§ 433(b)(2), 433(c), 432(e)(5), and 441b(b)(4)(A)(i), that MediaAmerica, Inc. violated 2 U.S.C. §§ 441b(a) and 441b(b)(4)(A)(i), and that Richard Geske, President of MediaAmerica, Inc. violated 2 U.S.C. § 441b(a). Notice is hereby given that the deposition will be taken at 1325 K. Street, N.W., Washington, D.C., begining on May 21, 1982 at 10:00 a.m. and continuing each day thereafter as necessary.

83040434893

Pursuant to section 437d of Title 2, United States Code, you are further hereby subpoenaed to produce on the same day any and all documents in your possession or control which relate to the establishment, financing, and administering of the National Candidates Committee.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., this 29th day of March, 1982.

Frank P. Reiche

Frank P. Reiche
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

3304043489

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Hal Stalvik
1514 Rhode Island Avenue, N.W.
Washington, DC 20005

Re: MUR 1363

Dear Mr. Stalvik:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. In accordance with an investigation being conducted by the Commission, it has issued the attached subpoena which requires you to appear as a witness and give sworn testimony on May 19, 1982, and to produce certain documents.

Since your testimony is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section of the Act prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is being made.

You may consult an attorney who may assist you in submitting the documents and accompany you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid $30, plus mileage at the rate of 22.5 cents per mile. You will be given a check for the appropriate amount at the time of your deposition.

83040349000

Please confirm your scheduled appearance with Stephen Mims at (202)523-4060 within ten days of your receipt of this notification. If you have any questions, please direct them to Mr. Mims, the staff member assigned to this matter.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena to Appear for Deposition and to Produce Documents

83040434901

Stm 5/5/82

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re: MUR 1363

Ms. Tere Linehan
1515 South Jefferson Davis Highway
Arlington, VA 22202

Dear Ms. Linehan:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. In accordance with an investigation being conducted by the Commission, it has issued the attached subpoena which requires you to appear as a witness and give sworn testimony on May 19 , 1982, and to produce certain documents.

Since your testimony is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section of the Act prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is being made.

You may consult an attorney who may assist you in submitting the documents and accompany you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid $30, plus mileage at the rate of 22.5 cents per mile. You will be given a check for the appropriate amount at the time of your deposition.

8 3 0 4 0 4 3 4 9 0 6

Please confirm your scheduled appearance with Stephen Mims at (202)523-4060 within ten days of your receipt of this notification. If you have any questions, please direct them to Mr. Mims, the staff member assigned to this matter.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena to Appear for Deposition and to Produce Documents

83044349 03

SKM
5/5/83

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

**CERTIFIED MAIL**
**RETURN RECEIPT REQUESTED**

Re: MUR 1363

Mr. Wayne A. Brill
5840 Cameron Run Terrace
Alexandria, VA 22303

Dear Mr. Brill:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. In accordance with an investigation being conducted by the Commission, it has issued the attached subpoena which requires you to appear as a witness and give sworn testimony on May 20 , 1982, and to produce certain documents.

Since your testimony is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section of the Act prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is being made.

You may consult an attorney who may assist you in submitting the documents and accompany you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid $30, plus mileage at the rate of 22.5 cents per mile. You will be given a check for the appropriate amount at the time of your deposition.

3 3 0 4 0 4 3 4 9 0 4

Please confirm your scheduled appearance with Stephen Mims at (202)523-4060 within ten days of your receipt of this notification. If you have any questions, please direct them to Mr. Mims, the staff member assigned to this matter.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena to Appear for Deposition and to Produce Documents

83040434905

SWM 5/5/83

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J. Curtis Herge, Esquire
Sedam and Herge
8300 Greensboro Drive
McLean, VA. 22102

Re: MUR 1363

Dear Mr. Herge:

On July 20, 1981, you received notification that the Commission had found reason to believe that your clients, MediaAmerica, Inc., the National Candidates Committee, and Richard Geske, had violated the Federal Election Campaign Act of 1971, as amended. On February 22, 1982, you were served a subpoena for the production of certain records pertaining to the Commission's investigation of this matter which was due on March 12, 1982. That deadline was extended, per your request, to March 26, 1982. Examination of other information available to the Commission has led it to determine that additional information is necessary. Consequently, the Federal Election Commission has issued the attached subpoenas which require that your clients, Richard Geske, and John D. Romanin appear to answer questions which will assist the Commission in carrying out its statutory duty of supervising compliance with the Act.

If you have any questions, please direct them to Stephen Mims, the staff member handling this matter, at (202)523-4060.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

SEM
5/5/82

Enclosure
Subpoena

3 3 0 4 0 4 3 4 9 0 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/JODY CUSTER

DATE: MARCH 29, 1982

SUBJECT: MUR 1363 - SUBPOENAS

The attached subpoenas regarding MUR 1363 have been signed and sealed this date.

Attachment:
Subpoenas (5)

8304043490 7

**BEFORE THE FEDERAL ELECTION COMMISSION**

| | | |
|---|---|---|
| In the Matter of | ) | |
| | ) | MUR 1363 |
| MediaAmerica, Inc. | ) | |
| National Candidates Committee | ) | |
| Richard Geske | ) | |

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 25, 1982, the Commission decided by a vote of 5-0 to take the following actions regarding MUR 1363:

1. Authorize issuance of the five subpoenas as submitted with the General Counsel's March 23, 1982 memorandum.

2. Approve sending the five letters as attached to the General Counsel's memorandum dated March 23, 1982.

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

Attest:

3/26/82
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

Received in Office of the Commission Secretary: 3-23-82, 10:14
Circulated on 48 hour vote basis: 3-23-82, 4:00

3 3 0 4 0 4 3 4 9 0 3

March 29, 1982

MEMORANDUM TO: Marjorie W. Emmons

FROM: Phyllis A. Kayson

SUBJECT: MUR 1363

Please have the attached Memo to the Commission distributed to the Commission on a 48 hour tally basis. Thank you.

Attachment

cc: Mims

8304043490

SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

82 MAR 23 A10: 14

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 23, 1982

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

SUBJECT: Authorization to Issue Subpoenas in Connection with MUR 1363

On February 11, 1982, the Commission authorized the issuance of a subpoena for documents necessary for further investigation of possible violations of the Act by MediaAmerica, Inc., the National Candidates Committee (formerly known as the National Republican Candidates Committee) and Richard Geske, President of MediaAmerica, Inc., and Chairman of the committee. This Office made concurrent efforts to contact other persons informally who may have relevant knowledge of the matters at issue. The names of these other persons were provided by Shirley S. King, former committee treasurer and employee of MediaAmerica, in a deposition to which she voluntarily submitted on September 16, 1981. To date, efforts by this Office to contact those individuals have not been successful.

Accordingly, the Office of General Counsel recommends that the Commission authorize the issuance of subpoenas for deposition and document production to the following persons:

1. Richard Geske, President and Director of MediaAmerica, Inc., and Chairman of the committee, through Mr. Herge, his counsel.

2. John D. Romanin, former treasurer of the committee and employee of MediaAmerica.

3. Wally Brill, auditor for MediaAmerica who also assisted in setting up the books for the committee.

4. Tere Linehan, Assistant Secretary of MediaAmerica, Inc., who was in charge of phone banks and fundraising.

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5. Hal Stalvik, employee of MediaAmerica, Inc., who was in charge of computer services and packaging of the mailing lists.

Recommendation

1. Authorize the attached subpoenas (5).
2. Approve sending the attached letters (5).

Attachments
1. Subpoenas (5)
2. Proposed letters (5)

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J. Curtis Herge, Esquire
Sedam and Herge
8300 Greensboro Drive
McLean, VA. 22102

Re: MUR 1363

Dear Mr. Herge:

On July 20, 1981, you received notification that the Commission had found reason to believe that your clients, MediaAmerica, Inc., the National Candidates Committee, and Richard Geske, had violated the Federal Election Campaign Act of 1971, as amended. On February 22, 1982, you were served a subpoena for the production of certain records pertaining to the Commission's investigation of this matter which was due on March 12, 1982. That deadline was extended, per your request, to March 26, 1982. Examination of other information available to the Commission has led it to determine that additional information is necessary. Consequently, the Federal Election Commission has issued the attached subpoenas which require that your clients, Richard Geske, and John D. Romanin appear to answer questions which will assist the Commission in carrying out its statutory duty of supervising compliance with the Act.

If you have any questions, please direct them to Stephen Mims, the staff member handling this matter, at (202)523-4060.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena

pages

8 3 0 4 0 4 3 4 9 1 2

UNITED STATES OF AMERICA

BEFORE THE FEDERAL ELECTION COMMISSION

Subpoena to Appear For Deposition and Produce Documents

TO: RICHARD GESKE

Re: Matter Under Review 1363

8304043491 3

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition as a witness with regard to the matter of MediaAmerica, Inc., and the National Candidates Committee (formerly known as the National Republican Candidates Committee), et. al. On June 29, 1981, the Commission found reason to believe that the Committee violated 2 U.S.C. §§ 433(b)(2), 433(c), 432(e)(5), and 441b(b)(4)(A)(i), that MediaAmerica, Inc. violated 2 U.S.C. §§ 441b(a) and 441b(b)(4)(A)(i), and that you violated 2 U.S.C. § 441b(a). Notice is hereby given that the deposition will be taken at 1325 K. Street, N.W., Washington, D.C., begining on April , 1982 at 10:00 a.m. and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are further hereby subpoenaed to produce on the same day any and all documents in your possession or control which relate to the establishment, financing, and administering of the National Candidates Committee.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., this day of March, 1982.

Frank P. Reiche
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

83040434914

UNITED STATES OF AMERICA

BEFORE THE FEDERAL ELECTION COMMISSION

Subpoena to Appear For Deposition and Produce Documents

TO: JOHN D. ROMANIN

Re: Matter Under Review 1363

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition as a witness with regard to the matter of MediaAmerica, Inc., and the National Candidates Committee (formerly known as the National Republican Candidates Committee), et. al. On June 29, 1981, the Commission found reason to believe that the Committee violated 2 U.S.C. §§ 433(b)(2), 433(c), 432(e)(5), and 441b(b)(4)(A)(i), that MediaAmerica, Inc. violated 2 U.S.C. §§ 441b(a) and 441b(b)(4)(A)(i), and that Richard Geske, President of MediaAmerica, Inc. violated 2 U.S.C. § 441b(a). Notice is hereby given that the deposition will be taken at 1325 K. Street, N.W., Washington, D.C., begining on April , 1982 at 10:00 a.m. and continuing each day thereafter as necessary.

8304043491 3

Pursuant to section 437d of Title 2, United States Code, you are further hereby subpoenaed to produce on the same day any and all documents in your possession or control which relate to the establishment, financing, and administering of the National Candidates Committee.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., this day of March, 1982.

Frank P. Reiche
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

83040434916

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Wayne A. Brill
5840 Cameron Run Terrace
Alexandria, VA 22303

Re: MUR 1363

Dear Mr. Brill:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. In accordance with an investigation being conducted by the Commission, it has issued the attached subpoena which requires you to appear as a witness and give sworn testimony on April , 1982, and to produce certain documents.

Since your testimony is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section of the Act prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is being made.

You may consult an attorney who may assist you in submitting the documents and accompany you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid $30, plus mileage at the rate of 22.5 cents per mile. You will be given a check for the appropriate amount at the time of your deposition.

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Please confirm your scheduled appearance with Stephen Mims at (202)523-4060 within ten days of your receipt of this notification. If you have any questions, please direct them to Mr. Mims, the staff member assigned to this matter.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena to Appear for Deposition and to Produce Documents

83040439113

UNITED STATES OF AMERICA

BEFORE THE FEDERAL ELECTION COMMISSION

Subpoena to Appear For Deposition and Produce Documents

TO: WAYNE A BRILL

Re: Matter Under Review 1363

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At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition as a witness with regard to the matter of MediaAmerica, Inc., and the National Candidates Committee (formerly known as the National Republican Candidates Committee), et. al. On June 29, 1981, the Commission found reason to believe that the Committee violated 2 U.S.C. §§ 433(b)(2), 433(c), 432(e)(5), and 441b(b)(4)(A)(i), that MediaAmerica, Inc. violated 2 U.S.C. §§ 441b(a) and 441b(b)(4)(A)(i), and that Richard Geske, President of MediaAmerica, Inc. violated 2 U.S.C. § 441b(a). Notice is hereby given that the deposition will be taken at 1325 K. Street, N.W., Washington, D.C., begining on April , 1982 at 10:00 a.m. and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are further hereby subpoenaed to produce on the same day any and all documents in your possession or control which relate to the establishment, financing, and administering of the National Candidates Committee.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., this day of March, 1982.

Frank P. Reiche
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

83040434920

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

**CERTIFIED MAIL**
**RETURN RECEIPT REQUESTED**

Re: MUR 1363

Ms. Tere Linehan
1515 South Jefferson Davis Highway
Arlington, VA 22202

Dear Ms. Linehan:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. In accordance with an investigation being conducted by the Commission, it has issued the attached subpoena which requires you to appear as a witness and give sworn testimony on April , 1982, and to produce certain documents.

Since your testimony is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section of the Act prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is being made.

You may consult an attorney who may assist you in submitting the documents and accompany you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid $30, plus mileage at the rate of 22.5 cents per mile. You will be given a check for the appropriate amount at the time of your deposition.

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Please confirm your scheduled appearance with Stephen Mims at (202)523-4060 within ten days of your receipt of this notification. If you have any questions, please direct them to Mr. Mims, the staff member assigned to this matter.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena to Appear for Deposition and to Produce Documents

83040349222

UNITED STATES OF AMERICA

BEFORE THE FEDERAL ELECTION COMMISSION

Subpoena to Appear For Deposition and Produce Documents

TO: TERE LINEHAN

Re: Matter Under Review 1363

8 3 0 4 0 4 3 4 9 2 3

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition as a witness with regard to the matter of MediaAmerica, Inc., and the National Candidates Committee (formerly known as the National Republican Candidates Committee), et. al. On June 29, 1981, the Commission found reason to believe that the Committee violated 2 U.S.C. §§ 433(b)(2), 433(c), 432(e)(5), and 441b(b)(4)(A)(i), that MediaAmerica, Inc. violated 2 U.S.C. §§ 441b(a) and 441b(b)(4)(A)(i), and that Richard Geske, President of MediaAmerica, Inc. violated 2 U.S.C. § 441b(a). Notice is hereby given that the deposition will be taken at 1325 K. Street, N.W., Washington, D.C., begining on April , 1982 at 10:00 a.m. and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are further hereby subpoenaed to produce on the same day any and all documents in your possession or control which relate to the establishment, financing, and administering of the National Candidates Committee.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., this day of March, 1982.

Frank P. Reiche
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

**CERTIFIED MAIL**
**RETURN RECEIPT REQUESTED**

Re: MUR 1363

Mr. Hal Stalvik
1514 Rhode Island Avenue, N.W.
Washington, DC 20005

Dear Mr. Stalvik:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. In accordance with an investigation being conducted by the Commission, it has issued the attached subpoena which requires you to appear as a witness and give sworn testimony on April , 1982, and to produce certain documents.

Since your testimony is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section of the Act prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is being made.

You may consult an attorney who may assist you in submitting the documents and accompany you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid $30, plus mileage at the rate of 22.5 cents per mile. You will be given a check for the appropriate amount at the time of your deposition.

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Please confirm your scheduled appearance with Stephen Mims at (202)523-4060 within ten days of your receipt of this notification. If you have any questions, please direct them to Mr. Mims, the staff member assigned to this matter.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena to Appear for Deposition and to Produce Documents

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UNITED STATES OF AMERICA

BEFORE THE FEDERAL ELECTION COMMISSION

Subpoena to Appear For Deposition and Produce Documents

TO: HAL STALVIK

Re: Matter Under Review 1363

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition as a witness with regard to the matter of MediaAmerica, Inc., and the National Candidates Committee (formerly known as the National Republican Candidates Committee), et. al. On June 29, 1981, the Commission found reason to believe that the Committee violated 2 U.S.C. §§ 433(b)(2), 433(c), 432(e)(5), and 441b(b)(4)(A)(i), that MediaAmerica, Inc. violated 2 U.S.C. §§ 441b(a) and 441b(b)(4)(A)(i), and that Richard Geske, President of MediaAmerica, Inc. violated 2 U.S.C. § 441b(a). Notice is hereby given that the deposition will be taken at 1325 K. Street, N.W., Washington, D.C., begining on April , 1982 at 10:00 a.m. and continuing each day thereafter as necessary.

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Pursuant to section 437d of Title 2, United States Code, you are further hereby subpoenaed to produce on the same day any and all documents in your possession or control which relate to the establishment, financing, and administering of the National Candidates Committee.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., this day of March, 1982.

Frank P. Reiche
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

83040434928

**Milton Reporting, Inc.**

*General Stenotype Reporting*

Suite 301
1601 Connecticut Ave., N.W.
Washington, D.C. 20009

R.E. Milton
President
F.R. Joyce
V.P. & General Mgr.

Phone:
202-833-3598
202-833-3599

Notary Public
D.C.-Va.-Md.

June 4, 1982

82 JUN 8 P2:04

Jonathan Levin
Attorney, FEC
1325 K Street, NW
Suite 700
Washington, D.C. 20005

Re: NATIONAL REPUBLICAN CANDIDATES' COMMITTEE, MUR 1363

Dear Mr. Levin:

The transcript of Wallace J. Brill's deposition taken on May 20, 1982, is ready for filing. Signature was waived.

As I recall, you mentioned to Mr. Brill that he would be able to read the deposition and note any changes; therefore, I've kept the original in our offices until we hear from you.

If you have any questions, please, call Fred Joyce at the above number.

If by July 5, 1982, Mr. Joyce has not heard from you, we will file the deposition.

Sincerely,

Sandra Vinson

Sandra Vinson
Reporter/Notary

cc: FEC
file

# ORIGINAL

Before the

FEDERAL ELECTION COMMISSION

- - - - - - - - - - - - - - - - - - x
:
In the Matter of: :
:
NATIONAL REPUBLICAN CANDIDATES' : MUR 1363
COMMITTEE, et al. :
:
- - - - - - - - - - - - - - - - - - x

Washington, D.C.

Thursday, May 20, 1982

Deposition of

WALLACE J. BRILL

a witness in the above-entitled matter, was called for examination by counsel for the Federal Election Commission, pursuant to agreement, taken at the offices of the Federal Election Commission, 1325 K Street, NW, Washington, D.C., beginning at 11:42 a.m., before Sandra Vinson, a Notary Public in and for the District of Columbia, when were present on behalf of the respective parties:

For FEC:

Jonathan Levin
Attorney
1325 K Street, NW
Suite 700
Washington, D.C.

Stephen Mims
Legal Intern
1325 K Street, NW
Suite 700
Washington, D.C.

C O N T E N T S


| WITNESS | EXAMINATION |
|---|---|
| Wallace J. Brill | 3 |


E X H I B I T S


| FEC Exhibits Marked for Identification and Attached: | Page |
|---|---|
| FEC Exhibit 1: MediAmerica, Inc., Financial Statements, December 31, 1979 | 14 |
| FEC Exhibit 2: Form 941, Employer's Quarterly Federal Tax Return, MediAmerica, Inc., September 30, 1979 | 22 |
| FEC Exhibit 3: Bank Reconciliation, MediAmerica and TCC, 1979, 12 pages | 24 |
| FEC Exhibit 4: Form 1120, U.S. Corporation Income Tax Return, 1979, MediAmerica, Inc., 6 pages | 37 |

Thereupon,

WALLACE J. BRILL

a witness, was called for examination by counsel for the Federal Election Commission and, after having been first duly sworn by the notary, was examined and testified as follows:

EXAMINATION BY COUNSEL FOR THE FEDERAL ELECTION COMMISSTION

BY MR. LEVIN:

Q. State your name and address for the record, please.

A. Wallace J. Brill, 6221 Executive Boulevard, Rockville, Maryland 20852.

Q. Mr. Brill, as a preliminary matter, I want to advise you in light of your volunteering to appear here that your statement here is sworn, and this is going to be a deposition.

If you wish to stop at any point, you are free to do so. And, if at any point you wish to ask an attorney before answering any question, you are free to do so.

What is your occupation?

A. I'm an accountant, a certified public accountant.

Q. For whom do you work?

A. Myself. I'm self-employed.

Q. You contract out to various clients?

A. Yes. Correct.

Q. Did you do any work for MediAmerica?

A. Yes, I did.

Q. When did you work for them? From what date to what date?

A. The ending date was sometime early in 1980 and I started ---

Q. Take your time.

A. I don't know if I've got anything in here to help me with it.

Q. Would this help you all? This won't be submitted as an exhibit but just as a refresher of recollection.

A. This was in March of 1981, but I didn't do any work for them. They called me and I couldn't find the time.

Q. This document was a letter from Mr. Brill to Richard Geske, dated March 29, 1981. That wouldn't help you then?

A. I think it was somewhere in the spring of 1979.

Q. How did you --

A. Wait a minute. The bills. Let's go back. Can we? I began work on May 29 of 1979.

Q. And how did you become associated with MediAmerica?

A. I met Rich Geske and John Romanin at NCPAC.

1 Q. What were you doing there? Were you working for NCPAC?

2 A. An audit for NCPAC, yes.

3 Q. What kind of experience do you have with groups

4 engaged in political activity? In general, is it extensive?

5 Are most of your clients political groups?

6 A. Somehow, at one time, I might have had four or five at

7 the same time. Now, I have none.

8 Q. Four or five out of how many?

9 A. Total clients?

10 Q. Yes.

11 A. I would guess forty.

12 Q. Could you describe in general what you did for

13 MediAmerica?

14 A. Primarily, I was engaged to perform an audit for the

15 year 1979. Finally, I issued an unaudited financial statement.

16 Most of the time I spent on MediAmerica was spent on

17 bookkeeping and payroll tax returns.

18 Q. Why would you have issued an unaudited financial

19 statement for 1979?

20 A. The records were such that I had to issue an unaudited

21 statement.

22 Q. The functional equivalent would be a sworn statement

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1 that this was exactly what the finances were?

2 A. My degree of responsibility is far greater on an

3 audited statement.

4 Q. I see. Okay.

5 Did you work on the auditing in 1980 for MediAmerica?

6 A. No. Wait a minute. I did it in 1980 for 1979.

7 Q. Did you do work for MediAmerica that would cover the

8 financial statement for the year 1980?

9 A. No. I did not handle their financial statement.

10 Q. Or bookkeeping or any other accounting?

11 A. Yes. I helped them prepare the payroll tax returns

12 for the quarter ending March 31, 1980.

13 Q. Anything after that?

14 A. I'm sure not.

15 Q. From the period of April 1st to -- let me rephrase that.

16 You did no work that would cover any of the accounting

17 or financial aspects of MediAmerica covering the period from

18 April 1980 until the end of the year?

19 A. That would be true. What you said is true.

20 Q. Did you do any auditing with respect to the National

21 Republican Candidates' Committee?

22 A. No, sir.

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Q. Do you know what the National Republican Candidates' Committee is?

A. I guess it's a PAC.

Q. Do you remember it being set up? Do you know anything about it?

A. I told Mr. Mims on the phone Monday that I never heard the name, but I guess I have because there's a memo in which Shirley King is given a chart of accounts for a PAC.

MR. LEVIN: Let's go off the record.

(Discussion off the record)

MR. LEVIN: Back on the record.

BY MR. LEVIN:

Q. Would you have a chart of accounts with you in your records?

A. I don't have a chart of accounts. I have a memo that I found this morning. Here it is.

MR. LEVIN: For the record, Mr. Brill has handed us a memorandum and I will read it: To Shirley King; Subject: Enclosures; it's dated 10-11-80.

"Dear Shirley: At long last is enclosed is a chart of accounts for a PAC. In all probability it's too much for a new organization; use the accounts as the need arises.

1 "The significance of the ABCD suffixes is A equals
2 general and administrative, B equals general and political,
3 C equals direct political, and D equals fundraising.
4 "Good luck."
5 And, it's signed Wally.
6 BY MR. LEVIN:
7 Q. Would you explain this?
8 A. Sure. You're not accountants?
9 Q. No.
10 A. The chart of accounts is a list of general ledger
11 accounts. In a set of books -- can we stop?
12 I was going to ask if that's enough.
13 Q. You might want to go on to be a little more explicit.
14 A. The general ledger is a book in which there is an
15 account, a sheet of paper, for each classification, the assets,
16 liabilities, net worth, expenses, income. A chart of accounts
17 is a listing of what each one of those accounts should be.
18 Q. So, you prepared this for the National Republican
19 Candidates' Committee and sent it to Shirley King?
20 A. Right.
21 Q. What was Shirley King supposed to do with the chart
22 of accounts? Was she supposed to set up the books?

A. I'm sure she was.

Q. Do you know if those books were set up?

A. No.

Q. From where did you gather the data for this?

A. The political action committees that I have done work for.

Q. So, it's a blank form and this is a way of helping to set it up?

A. No. It's a list, like, accounts receivable, accounts payable, federal income withheld, contributions received, contributions dispersed ---

Q. So, there were no actual figures on the charts at this time?

A. Just names of general ledger accounts.

Q. Categories?

A. Categories.

I see.

A. Every one of the numbers is a separate account.

Q. Do you know if the National Republican Candidates' Committee, which is the committee I refer to after this, had separate books?

A. I do not know.

1 Q. Do you know how they kept -- I'm sorry. Go ahead.

2 A. I do know that none of the accounts were co-mingled

3 in the MediAmerica books.

4 Q. How were they kept separate?

5 A. Because I know that the only thing in the Medi-

6 America books were the MediAmerica transactions.

7 Q. That's from your personal knowledge of having seen

8 the MediAmerica books?

9 A. Yes. And, I have never seen the books for the

10 committee.

11 Q. Would, to your personal knowledge, all of the

12 documents that you worked from to settle the books have been off

13 MediAmerica documents?

14 A. Yes. You are saying it right. Yes, sir.

15 BY MR. MIMS:

16 Q. Did you ever see, in performing your audit of

17 MediAmerica, the deposit procedures they used, or deposit slips,

18 to be sure, I guess, that there was no way for any organization's

19 deposits to go into the MediAmerica accounts?

20 A. I know that I never saw the name of that committee

21 on the documents or pieces of paper. I'm sure that all the

22 cash that went into MediAmerica belonged to MediAmerica, because

MediAmerica issued invoices to their customers and the checks that came in had to match up with the invoices they sent to their customers.

Q. Were invoices sent to the committee, the National Republican Candidates' Committee?

A. I don't know.

Q. You don't recall seeing any invoices sent to the committeee or payment received from the committee for MediAmerica?

A. I don't recall it.

BY MR. LEVIN:

Q. Do you recall seeing any check stubs dealing with the committee with the committee name on it with payment from the committee or anything like that? Any checks or check stubs for record-keeping purposes.

A. Say the name again.

Q. The National Republican Candidates' Committee.

A. I don't think so.

Q. Maybe they could have been a customer?

A. Right.

Q. You don't recall?

A. I don't.

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1 Q. But, you say there were invoices reflecting
2 transactions between MediAmerica and the National Republican
3 Candidates' Committee?
4 A. No, sir. I don't remember that.
5 BY MR. MIMS:
6 Q. Do you know whether or not MediAmerica set up any
7 safeguards to ensure that committee moneys did not end up in
8 MediAmerica accounts? Did they try to separate the committee
9 moneys from the MediAmerica moneys?
10 A. I don't think they were operating when I was there
11 because I've never seen a bank statement for that committee.
12 Q. How did they handle the phone-bank receipts for
13 their other clients?
14 A. They had a phone bank going.
15 Q. For which they had sizable receipts?
16 A. Yes.
17 Q. Were the receipts the result of billing their
18 clients for their services or were they generated from phone-
19 bank solicitations directly?
20 A. They did bill clients for the services of the phone
21 bank.
22 Q. Do you know if any receipts from individuals came

3 3 0 4 0 4 0 4 9 1 1

in directly to MediAmerica as a result of the phone-bank operation?

A. At no time did I ever see it.

MR. MIMS: Okay.

BY MR. LEVIN:

Q. Do you know how MediAmerica would arrive at a billing? In other words, what was the basis of billings? Was it accurate in your determination?

A. To their phone-bank customers?

Q. The billings in general for the direct-mail customers or the phone bank or whatever services they performed.

A. I really don't know how they put those bills together.

Q. You would have no way of knowing either way if they accurately reflected the amount of the services provided to the committee?

A. As an accountant, what I would do at the end of an accounting period -- see, if your expenses exceeded your income, you didn't bill enough.

Q. Did you notice any of that?

A.

Q What form are you referring to?

A The statement of income and retained earnings.

Q That's for the end of the year 1979; correct?

A Yes, sir.

MR. MIMS: So we can see what we are referring to in the transcript, I'll have the reporter mark this FEC Exhibit 1.

(The document referred to was marked for identification FEC Exhibit 1, a copy of which is attached to the original transcript of this deposition.)

BY MR. LEVIN:

Q Can you identify that document, FEC Exhibit 1?

A Yes, I can. It's the financial statement for MediAmerica, Inc., for the twelve-month period ending December 31, 1979, by me.

Q And, we are referring to what's marked at the top Exhibit B, which is attached to FEC Exhibit 1.

Now, this is with reference to the prior question as to income and expenses of MediAmerica.

A

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Q Let me ask: you said you did auditing for NCPAC. Have you done it for other political committees?

A Yes. There was ---

Q I don't need to know the names.

How does it compare with other political committees that you have audited?

A This is not a political committee. This is a business.

Q Let's take a category of this particular entity and political committees, one group, and compare them. For the purpose of the question, how would this compare with the financial situation of the political committees, the ones that you are familiar with?

8 3 0 4 0 4 9 1 5

Q Did they say another problem was that people weren't paying MediAmerica?

A. Yes. Not paying as quickly as they would like to be paid.

Q. Did anybody ever make a suggestion to them that perhaps they ought to use a different procedure to collect this money or ensure this money was paid?

A. I don't know that they had a procedure other than calling people up and asking them to please pay their bill.

Q. Let's go back a few steps.

Did you notice any kind of written agreement between MediAmerica and their customers for providing services? Let's say a written contract.

A. No. I never saw such.

Q. Was there a written memorandum of agreement that might not appear formally as a contract? Was there any evidence that they had an agreement other than a bill or voucher?

A. I have not seen such.

Q. You never saw a written memorandum?

A. Never saw a written memorandum.

Q. So, the only evidence you would have that there was any agreement between MediAmerica and those people for whom they were providing services would be the bills and vouchers?

A. The bills and invoices they sent to their

1 customers, correct.

2 Q. How would that compare, let's say, to other

3 businesses in general?

4 A. In general, most businesses deal with their

5 customers on an open account.

6 Q. You mean there are no written contracts. The only

7 evidence is the invoice or bill?

8 A. Correct. And, in some cases, customers may send in

9 a purchase order to render services or ship goods.

10 Q. This would be like an on-going customer; correct?

11 A. Correct.

12 BY MR. MIMS:

13 Q. This would be done without confirmation, without

14 written confirmation, prior to the performance of services in

15 amounts of several thousand dollars' worth?

16 A. Yes. I've done a great deal of work for electrical

17 contractors and have known them to do substantial sums of work

18 with no written contract or written agreement.

19 BY MR. LEVIN:

20 Q. How about a company that saw itself developing a

21 pattern where people just weren't paying? Did you know of any

22 companies like this and that said: we better get this down in

writing? Any of your clients over the years?

A. No. No.

Q. Let's get more specific then.

How would this compare to the political committees that you have worked for, such as NCPAC?

Would they be working on a contractural basis, if they provided any services, on a written contractural basis?

A. I can't recall NCPAC ever rendering any services for anyone.

Q. Did anyone ever make any comment that you heard, second-hand or first-hand, as to the need perhaps to be more vigilant in the collection of obligations to MediAmerica, the payment of bills and the receipt of money that was owed them?

In other words: we've got to find a way to make sure we get payment, because our cash-flow situation is pretty bad.

A. I can't remember them talking about a different procedure of collecting accounts receivable, no.

BY MR. MIMS:

Q. Did you, during the process of conducting the audit for MediAmerica, ever see any invoices or bills which they might have received from anyone else? For advertising? Do

you have any idea how they generated business?

A. Oh, yes. I have seen invoices from radio and television stations.

Q. Do you know the substance of the invoices? Was it for MediAmerica advertising or work that might have been performed for a client?

A. Or services they performed for a client.

Q. Do you have any idea or any knowledge of how MediAmerica obtained those clients in the first place?

A. Not the least.

Q. So, they did not enter into an advertising campaign to promote their services; did they?

A. That's correct. The advertisements or the advertisements placed were for others, for customers.

Q. Did you ever see any of the advertisements? Were any of them attached to any of the invoices, from the newspaper, say?

A. No. I just don't remember.

As an accounting procedure, I wouldn't necessarily go through all their invoices. I would go to the books of the account and look for checks that were written to pay people and see that they were classified as to salaries or rent or

1 advertising, whatever it was; but, to actually sit down and go
2 through all the invoices, no.
3 Q. Who prepared the books of the accounts for the
4 period you did audit?
5 A. I guess that was Karen.
6 Q. Karen Dent; is that correct?
7 A. Yes. And, there was another girl that helped her.
8 Q. Could it have been Shirley King?
9 A. No. Before Shirley. At the time that Karen was
10 there. It was a part-time girl. She did have help.
11 (Discussion off the record)
12 MR. LEVIN: I'm going to have the reporter mark
13 this as FEC Exhibit 2.
14 (The document referred to was
15 marked for identification
FEC Exhibit 2, a copy of which
16 is attached to the original
transcript of this deposition.)
17 BY MR. LEVIN:
18 Q. I'm showing a copy of FEC Exhibit 2 to you.
19 Can you identify that document?
20 A. Yes. This document is form 941, the employer's
21 quarterly federal tax return.
22 Q. On the right-hand side, just below the middle of

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1 the page, there are some letters, MA and TCC.

2 Is the MA for MediAmerica?

3 A. Correct.

4 Q. And, what does the TCC stand for?

5 A. I was afraid you were going to ask that.

6 It stands for the bank account for TCC, payroll for

7 TCC. That was a large customer that utilized their phone bank

8 and they kept track by payroll records of who was on the phones

9 doing TCC work and who did MediAmerica work.

10 But, of course the federal government looks for one

11 tax return for an entity. The significance of MA and TCC and

12 the numbers is that the MA indicates MediAmerica's share of

13 this expense, of these taxes, and the number for TCC indicates

14 the amount of money that is attributable to the customer, TCC.

15 Q. The TCC: what does that stand for?

16 A. I'm not trying to be evasive and I'm not getting

17 that old, either, but I can't remember what it stood for.

18 I'm just trying to think of some form here that

19 might have it.

20 Can I ask something off the record?

21 MR. LEVIN: Off the record.

22 (Discussion off the record)

MR. LEVIN: Back on the record.

BY MR. LEVIN:

Q. Mr. Brill, you want to explain the significance of TCC, the bank reconciliation; is that correct?

A. Correct.

Q. Go ahead.

A. MediAmerica maintained a checking account that it designated TCC. MediAmerica attempted to get advances from TCC which it put into a separate bank account to use to pay TCC employees. It was a method for accounting for the cash they received from TCC.

MR. LEVIN: For the purposes of the record, I'd like to have the reporter mark this FEC Exhibit 3.

(The document referred to was marked for identification FEC Exhibit 3, a copy of which is attached to the original transcript of this deposition.)

BY MR. LEVIN:

Q. Now, I'm showing FEC Exhibit 3 to Mr. Brill.

For the record, this is the bank reconciliation that you were discussing, this document that is a bank reconciliation, FEC Exhibit 3; is that correct?

A. That's correct.

1 BY MR. MIMS:

2 Q. You indicated a few moments ago that MediAmerica

3 was paying the employees of TCC. Correct me if I'm wrong.

4 A. No. They are not TCC employees. They were

5 MediAmerica employees who were doing TCC work.

6 BY MR. LEVIN:

7 Q. It might be helpful to make one more effort at

8 least to pinpoint what TCC is.

9 Is it possible, as you said before, that it's a

10 conservative coalition?

11 A. I think I said "caucus." I think it was after the

12 convention.

13 Q. Is it a political committee?

14 A. I don't know that for a fact.

15 Q. Was it a politically oriented client? It may not

16 have supported candidates, but it may have done issue work.

17 A. The extent of my knowledge of TCC was seeing checks

18 come in from TCC and bills go out to TCC.

19 BY MR. MIMS:

20 Q. Were the checks in large amounts or numerous checks

21 for small amounts?

22 A. There were four checks for larger amounts.

1 Q. Based on the invoices from MediAmerica to TCC?
2 A. Correct.
3 Q. What kind of services did MediAmerica provide TCC?
4 A. I think it was mostly a phone bank.
5 Q. Do you know if MediAmerica provided similar
6 services for other organizations, for other clients?
7 A. I don't know. I don't remember.
8 Q. Do you, as an accountant, have any idea why
9 MediAmerica would have established a separate banking account
10 for a client, itemizing payment to MediAmerica employees, as
11 opposed to merely submitting an invoice to TCC for work done?
12 A. Yes. They attempted to get advances from TCC, money
13 paid ahead. They would take the money and put it in this
14 account and it was a way for knowing when it was time they
15 needed another advance from TCC.
16 In other words, TCC would have pre-paid that and
17 you have the agreement to get the money up front.
18 Q. Would that have been a written agreement?
19 A. I don't know.
20 Q. Are you saying that TCC had some kind of special
21 relationship that other clients did not have?
22 A. I am confident that it was one, if not the biggest

one, then one of their bigger clients.

I don't remember anyone else, any other customer, having been provided with a separate banking account. So, I guess we could consider it very large.

BY MR. LEVIN:

Q. Let me establish this.

Is there any of the same set up for the National Republican Candidates' Committee?

A. Not that my memo of October of 1980 to Shirley indicates, enclosing the chart of accounts for a PAC.

Q. The memo read into the record toward the beginning of this deposition?

A. I lost my place. TCC existed way before October 11 of 1980.

Q. How much way before?

A. I believe MediAmerica started in 1978. I didn't file a tax return for 1978; someone else did. But, I'm confident that their name was prominent throughout calendar year 1979.

Q. Would it have started at the same time that MediAmerica did? In 1978?

A. I don't know.

1 Q. It could have started before?

2 A. Or after. Correct.

3 BY MR. MIMS:

4 Q. Did you see the invoices for TCC?

5 A. I'm sure I have seen them.

6 Q. Were the mailing addresses of TCC and MediAmerica

7 separate?

8 A. Yes.

9 Q. A full, separate street address?

10 A. Correct.

11 BY MR. LEVIN:

12 Q. Would the payroll checks, in other words, employee

13 checks, be issued from TCC as well as from MediAmerica, let's

14 say, for time spent on TCC work?

15 A. When you say checks from TCC, I'm trying to

16 distinguish that we don't have a TCC banking account. It

17 really belongs to MediAmerica.

18 Q. In whose name is the banking account?

19 A. It's just a designation of TCC internally. As far

20 as the world is concerned, as far as the bank is concerned,

21 it's MediAmerica.

22 Q. Then the account is separated from other MediAmerica

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1 bank funds?

2 A. Correct. They had two checking accounts.

3 Q. One for MediAmerica and one for MediAmerica, slash,

4 TCC?

5 A. Slash TCC.

6 Q. Well, the operation of the TCC account, was that

7 coming from MediAmerica or were they dealing with some outside

8 group of people?

9 A. The employees?

10 Q. In other words, we have established that TCC is a

11 client of MediAmerica, but who is MediAmerica dealing with?

12 An outside group of TCC people or was it dealing solely

13 in-house?

14 A. No. TCC is another entity.

15 Q. This other entity, however -- do the people who

16 constitute this other entity also work for MediAmerica or are

17 there people in TCC who have an association with MediAmerica?

18 A. No. There is really no way in examining MediAmerica

19 records that I would know that. I would have no way of knowing

20 the names of the people at TCC.

21 Q. But, did you get a sense of it being outside people?

22 A. Definitely. I got the impression that it was another

organization entirely. They hired MediAmerica to conduct a phone bank.

Q. You said TCC had a different address. Did it headquarter out of a totally different place or did they merely have different mailbox numbers?

A. I don't remember the address, but the bills were mailed out and the checks mailed from TCC.

Q. And was it a mailbox number or an actual street address?

A. I'm afraid I don't know.

(Discussion off the record)

Q. When MediAmerica was doing its work for TCC, would they set up a separate facility within the office? A separate file drawer, a separate desk, a separate phone line for TCC?

A. No.

Q. In other words, you are saying that with the exception of the fact that they set up this account to keep special tabs on TCC, they treated TCC no differently than they treated their other clients?

A. That's the way I observed it, yes.

Let's say a good client.

Q. I don't understand something. If it's a good client,

1 why have they gone to the trouble of keeping such tabs on them;
2 in other words, to make sure there is another account, to make
3 sure they are getting payment for services provided for TCC?
4 A. Again, I believe that's the only client they had
5 that they got paid in advance and used a bank account for those
6 funds which were received in advance.
7 Q. In other words, this was the only client that was
8 actually -- all the other clients were paying after services
9 were received or somewhat after; is that correct?
10 A. In the main, yes. That was the method of doing
11 business.
12 Q. And, you are saying that because TCC made it a
13 practice of doing that, MediAmerica set up this account? Or,
14 was it because MediAmerica decided that for some reason it
15 should obligate TCC to pay in advance?
16 A. Well, I think it was expedient to get the cash
17 any way they could.
18 Q. What I am trying to get at is, in addition to being
19 a large client, was TCC as an entity paying this money in
20 advance and they found this was a good way to take that money
21 in, or was there some reason why MediAmerica was singling
22 TCC out and saying you have got to pay this way?

A. It's possible they singled TCC out in the very beginning because they were going to be such a big operation that MediAmerica could not have funded it, so they said to TCC: if you want me to open a phone-bank operation of the kind you describe, you are going to have to give me money up front; I'll put it in a separate bank account and you can look, if you want, to see what's in the separate account; but, we can't fund it; you have to give us cash up front.

Q. Do you know of any other client they did that with?

A. I don't know of any.

BY MR. MIMS:

Q. Do you have any idea, in providing services for TCC, what kind of gross profit MediAmerica might have derived from this service for TCC?

A. I don't.

BY MR. LEVIN:

Q. So, you don't know whether the funds paid by TCC just covered the costs of MediAmerica?

A. The truth of the matter is that they could have lost money.

Q. On TCC?

A. Or made an unconscionable profit. I have no notion.

BY MR. MIMS:

Q. Did they make an unconscionable profit or lose money on any other clients they had?

A. Their bookkeeping system is not such that you could tell. For what you are saying you need a job-cost system, and they don't have such a system.

BY MR. LEVIN:

Q. You have no idea of whether three hundred or three thousand pieces went out for the money they were receiving?

A. That's correct. I have no way of knowing.

Q. That wouldn't have been on any of the documents that you might have seen?

A. I think if a person sat down and went through the TCC invoices and put them over here and then goes through the books and gets out every expense that was applicable to TCC and determined some sort of profit -- I guess it could be done.

(Discussion off the record)

Q. Now, is it correct that you stated before that there were checks issued to employees from TCC, but MediAmerica did all the paying of the employees, MediAmerica employees?

A. That's what I said but you realize I didn't audit TCC so I wouldn't know what checks they wrote.

Q. To?

A. To anybody.

I'm saying that, to my knowledge, MediAmerica paid all the MediAmerica employees who did work for TCC on those premises.

Q. Did MediAmerica somehow separate out the payments it was making to its employees for actual work done for TCC as opposed to work done for the rest of its clients?

A. Yes.

Q. They did?

A. Yes.

Q. Could you elaborate on that then?

A. By some method with which I'm not familiar, each employee's hours spent on TCC work was indicated on some document and, on payday, the hours they worked for TCC were paid out of the TCC account. All other payroll was paid out of the MediAmerica account.

BY MR. MIMS:

Q. If you had someone working on the TCC business during any given pay period, as well as other MediAmerica business, would that person be paid out of one check?

A. Two checks.

Q. They would receive two, separate, distinct checks?

A. No question. That's one of the reasons I had such a time with it.

BY MR. LEVIN:

Q. Would this kind of arrangement been true for any other client of MediAmerica?

A. I'm sure that was true for all of 1979.

Q. Then this situation was unique? No other committee had a set up which would keep tabs on time and issue separate checks from different accounts; is that correct?

A. Could I say this?

Q. Sure.

A. They might have kept separate time on other clients -- I don't know -- but not separate pay checks.

Q. Separate time, keeping time separate might have been for billing those other clients?

A. Yes, sir.

Q. Did TCC have any control over that account, over that MediAmerica/TCC account?

Let's say, did they have drawing rights? Was there any way to use the money in that account?

A. Some person at TCC could easily have been a

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1 signatory on that account and there's no way on earth I would
2 ever have known it.
3 Q. So, it's possible then that MediAmerica had this
4 account -- let's call it, for convenience, the MediAmerica/TCC
5 account -- and these moneys would not have been solely used
6 for MediAmerica services for TCC?
7 A. I'm sorry. I did listen, but I lost the trend.
8 Q. I know it's complicated.
9 I have envisioned this account here and, for
10 convenience sake, we are calling it MediAmerica/TCC. We
11 already know that MediAmerica has drawing rights on it, has the
12 right to use those funds the way it sees fit, and they have
13 decided to use them solely for TCC.
14 Is it possible that TCC could have also dipped in
15 and used those funds for its purposes, maybe apart from
16 MediAmerica?
17 A. In the time I was there, I did not ever see a
18 check go through that account that was not allegedly for
19 employees or other purposes on the MediAmerica premises.
20 Q. So, you saw all the checks that went through that
21 account while you were doing the auditing?
22 A. I saw them all listed in a book.

BY MR. MIMS:

Q. Were you aware that they were totally limited to employees' pay checks, FICA, Social Security, so forth?

A. I guess I was trying to be all-inclusive. I can't think of any check having been written from them except for employees or payroll taxes.

Q. Were those totally limited to employees' payroll, FICA, Social Security?

A. Yes.

(Discussion off the record)

MR. LEVIN: I'll ask the reporter to mark this FEC Exhibit 4.

(The document referred to was marked for identification FEC Exhibit 4, a copy of which is attached to the original transcript of this deposition.)

MR. LEVIN: And, we are showing FEC Exhibit 4 to Mr. Brill.

BY MR. LEVIN:

Q. Can you identify that document for the record?

A. Yes. This is a form 1120, U. S. corporation income tax return for the year ending December 31, 1979.

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BY MR. MIMS:

Q. I have one question off this return and that is on page 2 of the return, Schedule E, Compensation of Officers, two officers are listed, Richard D. Geske and John D. Romanin, and the item provides the amount of compensation.

To your knowledge, did these individuals, Mr. Geske and Mr. Romanin receive any compensation from other sources during this period -- from clients, perhaps -- which was not itemized on this income tax return?

A. There's no way in the world I would know if ABC Company paid Rich Geske $500 to consult with them on some matter. I wouldn't know and it would be up to them to report that $500. But, these are sums paid to them by MediAmerica.

MR. LEVIN: Let's go off the record for a second.

(Discussion off the record)

MR. LEVIN: Back on the record.

We already have in as an exhibit the financial statements of MediAmerica for the year ending December 31, 1979, and I believe that has been marked FEC Exhibit 1. If it's not marked exhibit 1, at least, we have identified it as the financial statement at the end of 1979.

BY MR. LEVIN:

Q. Mr. Brill, referring to Exhibit B on that financial statement, these figures cover the entire year of 1979; is that right?

A. That's correct.

Q. Item number 2 under Income and the fifth from the last item under Expenses is labeled "Receptions."

Now, the income of receptions is $45,305 and the expenses of receptions is $18,026; is that correct for the record?

A. Correct.

Q. Could you explain what these receptions were? Do you know?

A. I remember one time I was there and they were talking about a reception that they had been hired to hold at someone's house, literally. I guess maybe they ordered the food. It sounded like as a caterer.

8 3 0 4 0 4 9 5 8

1 Q. That they were the caterer?

2 A. It sounded like it. They must have invited all the

3 people or conducted the reception.

4 Q. Who asked them to do this?

5 A. I guess a client, a customer.

6 Q. A political committee or a politically oriented

7 organization?

8 A. I would think so.

9 BY MR. MIMS:

10 Q. Were there any invoices other than the caterer?

11 A. I'm sure they sent invoices. That is what created

12 the $45,000 income. Yes, sir, they sent out the bills for it.

13 BY MR. LEVIN:

14 Q. I know it's been a long time, but do you recall

15 who they did that for?

16 A. I'm sorry. I'm not sure I ever knew.

17 BY MR. MIMS:

18 Q. Is it possible that the proceeds could have been

19 collected at the reception by MediAmerica?

20 A. I'm sure not.

21 Q. May I ask how you're sure not?

22 A. I don't remember a huge amount of green money that

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1 was collected somewhere and deposited for a reception.

2 BY MR. LEVIN:

3 Q. This income that went to MediAmerica, what would

4 that represent? Is that a fee from a committee that's being

5 benefited?

6 A. I don't remember who was billed or who paid the bill.

7 Q. In essence, what you were saying before was that it

8 is a possibility that, in addition to doing mailing services

9 and phone services, MediAmerica was engaging in campaign-

10 oriented services, such as catering a reception; is that right?

11 A. I'm sorry I used the word caterer. I don't know

12 what they did there. They must have provided substantial goods,

13 too.

14 Q. Were these checks from individual contributors or

15 would this money have been received from a client paying a

16 percentage of the receipts that the client got from the

17 reception?

18 A. No. MediAmerica received no contributions.

19 MediAmerica arranged for receptions. I guess, they sent out

20 invitations, maybe made arrangements with caterers, that kind

21 of thing.

22 Q. They spent $18,000 doing that?

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A. For the receptions, the printing expenses, bills, maybe there wasn't even a caterer.

Q. Are we talking about more than one reception here?

A. Yes.

Q. Are you saying then that the $45,000 might have been a fee, an aggregate of fees, they received for performing this service?

A. Yes, sir. That's what I'm saying.

Q. Do you know whether they made arrangements where they would get a percentage of each contribution?

A. I don't know.

Q. Would you know if contributors might have been informed that, when you make this contribution to committee X, then fifteen percent of the money is going to MediAmerica?

A. I don't know that there were contributions involved at all.

Q. Somehow, somewhere, money was made somewhere along the line so that MediAmerica could get paid by that committee.

A. Suppose -- and this is strictly a "suppose"; I don't know that it's true -- but suppose that some politically oriented organization said: we want to have a reception -- and picking somebody out of the blue sky -- at the vice president's

8 3 0 4 0 4 9 7 1

1 home on Sunday morning and invite all these people. Let's
2 contact Rich Geske and have him do it. And, he says, okay,
3 I'll make all the arrangements and it's going to cost you
4 $25,000, or based on the time we spend or whatever expenses we
5 have got, and we will send you a bill.
6 Q. We are talking about something that could be a
7 non-political event?
8 A. Could be.
9 Q. Okay.
10 Items six and seven under Income: awards, badges,
11 buttons, and flags is six, and bumper stickers and pens is
12 seven. Would you tell us what that is about?
13 A. Not in great detail. I can tell you what I think
14 it is, the majority of it.
15 When Pope John came here, they bought all kinds of
16 memorabilia and sent people down to the Mall, wherever it was
17 the Pope appeared, and tried to sell them.
18 Q. Would any of these have been for political
19 committees, political candidates?
20 A. I have no idea.
21 Q. Would any of these have been political buttons or
22 flags or badges or stickers and pens? Buttons that had a

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candidate on it whereby the money would go directly to MediAmerica?

A. That is money from the person who bought the pen or something?

Q. Exactly.

A. I don't think that's the case. If anything, if it was political in nature, I think it would be something like having a printer print 10,000 bumper stickers and sold them to the candidates' committee or whatever, not that they got contributions for these items. I don't think so.

Q. So, this would be another kind of service, in addition to the mail and phone services?

A. They were varied.

Q. Basically, they did about any kind of service for the committees, not just direct mail and phone banks?

A. Right.

Q. So, on item two of Expenses, where it says "awards, badges, buttons, and flags," this would have been income they received from committees that were paying for services, in addition to income they may have received from Pope John Paul's visit?

A. Maybe I misunderstood. The expenses: that's the

amount of money they paid out to outside suppliers to buy buttons, flags, pens, and so forth.

Q. Right. I confused the two. Exactly.

So, the money they paid out is these items?

A. Right.

(Discussion off the record)

MR. LEVIN: I have no further questions, Mr. Brill. Do you have a statement that you want to make for the record at this time?

THE WITNESS: I think, finally, I would like to say that I am reasonably confident that no funds flowed through MediAmerica bank accounts in calendar year 1979 which were not properly documented and supported on their books of account.

MR. LEVIN: That's it then.

Do you wish to waive signature?

THE WITNESS: That's fine. I'll waive signature.

MR. LEVIN: Thank you very much for coming.

(Thereupon, at 12:45 p.m., the taking of the deposition was concluded.)

(By stipulation of counsel and agreement of the witness, reading and signature waived.)

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CERTIFICATE OF NOTARY PUBLIC

I, Sandra Vinson, the officer before whom the foregoing deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken by me in shorthand and thereafter reduced to typewriting under my direction; that said deposition is a true record of the testimony given by said witness; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken; and further that I am not a relative or employee of any attorney or counsel employed by the parties thereto, nor financially or otherwise interested in the outcome of the action.

Sandra Vinson

Notary Public in and for the
District of Columbia

My commission expires:
July 14, 1986

Gcc# 7913

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82 JUN 8 P2:05

June 4, 1982

Jonathan Levin
Attorney, FEC
1325 K Street, NW
Suite 700
Washington, D.C. 20005

Re: NATIONAL REPUBLICAN CANDIDATES' COMMITTEE, MUR 1363

Dear Mr. Levin:

The transcript of Wallace J. Brill's deposition taken on May 20, 1982, is ready for filing. Signature was waived.

As I recall, you mentioned to Mr. Brill that he would be able to read the deposition and note any changes; therefore, I've kept the original in our offices until we hear from you.

If you have any questions, please, call Fred Joyce at the above number.

If by July 5, 1982, Mr. Joyce has not heard from you, we will file the deposition.

Sincerely,

Sandra Vinson

Sandra Vinson
Reporter/Notary

cc: FEC
file

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GCC# 5732

# Milton Reporting, Inc.

R.E. Milton
President
F.R. Joyce
V.P. & General Mgr.
Y. Deutschman
Treasurer

General Stenotype Reporting
Suite 301
1601 Connecticut Ave., N.W.
Washington, D.C. 20009

Phone:
202-833-3598
202-833-3599

Notary Public
D.C.-Va.-Md.

October 27, 1981

Scott Thomas, Esq.
Federal Election Commission
1325 K Street, N.W.
Washington, D. C.

1981 OCT 29 PM 4:12

Re: National Republican Candidates' Committee

Dear Mrs. King:

The court copy of your deposition in the above-captioned case, taken October 19, 1981 , is submitted herewith for your reading and signing as agreed to by counsel.

Please follow the procedure enumerated below in order to comply with the rules:

1. Make corrections in ink.
2. Any language stricken or corrected should have a single line drawn through it and your initials, so that the court may have before it the language as transcribed as well as corrected.
3. Place an asterisk at the end of each correction and at the bottom of each page state your reason for the correction.

The rules require a reason for any change or correction. It may be general; such as, "to correct stenographic errors," or "to clarify the record," or "to conform with the facts."

Please sign on the line indicated and return this court copy to this office as soon as possible.

Very sincerely yours,

MILTON REPORTING, INC.

Karen Hennenkamp

cc:
file

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 5, 1982

Mrs. Shirley Elaine King
2059 Huntington Avenue
Apartment No. 901
Alexandria, Va. 22303

Re: MUR 1363

Dear Mrs. King:

Enclosed are two copies your deposition, taken on October 19, 1981. One copy is being sent to you for any corrections you may have and your signature. The additional copy may be retained by you for your file. The deposition must be signed within thirty days of your receipt of this letter. If the signed deposition has not been returned within that time, it may be used as though signed pursuant to Rule 30 of the Federal Rules of Civil Procedure and Commission regulation 11 C.F.R. § 111.12(c).

If you have any corrections of only a word or two, they may be made on the copy of the deposition.

If you have any corrections of more than a word or two, please do not make the corrections on the deposition itself. On the separate sheets of paper we have enclosed, note the page and line numbers to be changed and quote the precise language you wish to change. Then on the same sheet of paper (or a continuation if necessary) state in detail any corrections you wish to make. Please sign and date any correction sheets used and return them and the corrected deposition copy in the envelope provided.

It is our understanding that you are not represented by counsel in this matter. Until receipt of contrary notice from you in writing, we will continue to communicate with you directly.

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If you have any further questions, please feel free to contact Stephen Mims at (202)523-4060.

Sincerely,

Scott E. Thomas
Assistant General Counsel

Enclosure:
Deposition
Correction Sheet

8304043497

I have reviewed a copy of the transcript of the deposition given by me to the Federal Election Commission on October 19, 1981 (pages 3 through 49 inclusive) and, except as noted below, it contains a correct transcript of the answers given by me to the questions therein recorded.

| Page No. | Line No. | Original Language | Modified Language |
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Shirley Elaine King

_____, 1982

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Before the

FEDERAL ELECTION COMMISSION

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In the Matter of: :
:
NATIONAL REPUBLICAN CANDIDATES' : MUR 1363
COMMITTEE, et al. :
:
- - - - - - - - - - - - - - - - - - -x

Washington, D. C.

Monday, October 19, 1981

Deposition of

SHIRLEY ELAINE KING

a witness in the above-entitled matter, was called for examination by counsel for the Federal Election Commission, pursuant to agreement, taken at the offices of the Federal Election Commission, 1325 K Street, N.W., Washington, D. C., beginning at 1:25 p.m., before Karen Hinnenkamp, a Notary Public in and for the District of Columbia, when were present on behalf of the respective parties:

1 For the Federal Election Commission:

2 SCOTT THOMAS, ESQ.
3 STEVE MIMS
Federal Election Commission
4 1325 K Street, N.W.
Washington, D. C.

5 - - -

6 C O N T E N T S

7


| WITNESS: | EXAMINATION BY COUNSEL FOR THE FEDERAL ELECTION COMMISSION: (Mr. Thomas and Mr. Mims) |
|---|---|
| SHIRLEY ELAINE KING | 3 |


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Thereupon

SHIRLEY ELAINE KING

a witness, was called for examination by counsel for the Federal Election Commission and, after having been sworn by the Notary, was examined and testified as follows:

EXAMINATION BY COUNSEL FOR THE FEDERAL ELECTION COMMISSION

BY MR. THOMAS:

Q Would you state your name, please?

A Shirley Elaine King.

Q Is it Mrs., Miss or Ms.?

A I am a widow, Mrs. I am Mrs. Edward George King, III.

Q Mrs. King, as a preliminary matter, I just want to advise you that in light of the fact that you have volunteered to appear here, we have asked that you swear that your statements are going to be true here and this is going to be a deposition.

A Fine.

Q I wanted to make sure that you are aware that certainly if you wish to stop at any point, you are free to do so. If at any point you feel you would rather have an attorney to help you answer questions, you are free to

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do that.

At the outset, I just wanted to go back to the reason that we got in touch with each other. It is my understanding that you have signed certain forms and reports of the committee known as the National Republican Candidates' Committee and that you no longer wish to have your name on the record as being an official of that. Could you sort of explain the background of that situation?

A All right. Let me ask you something. Wait a minute.

Q Off the record?

A Yes.

(Discussion off the record.)

THE WITNESS: I don't know when my name became on it. Do you have the first report that I signed?

MR. THOMAS: We can get that, yes.

(Discussion off the record.)

THE WITNESS: I don't know. But anyway, what I want to know from you is where should I start?

BY MR. THOMAS:

Q I think probably to serve your interests, if you submitted a letter --

A I can't remember when I actually -- when he asked do this, and we signed some things and they were send then we had a report and John signed it and I save signed it instead of John. But some way or othe was a mixup. They didn't get the correct -- wait a Let me think. John signed the report and I shou signed the report, and then we were --

Q You say John --

A Romanin. He signed it and I should have signed it think that was one of the first reports we went in. Lied down here and somebody said I had to get the rain.

(Discussion off the record.)

MR. THOMAS:

Q in, my understanding is that you want to have your name oved as an officer of this committee.

A ht.

Q the Treasurer.

I wou assume that it would be adequate if you drafted a letter ar sent it to the attention of the Federal Election Commission d stated that effective that day, you wanted to have you name removed as the Treasurer of that

A See, I can't remember when I actually -- when he asked me to do this, and we signed some things and they were sent in, and then we had a report and John signed it and I should have signed it instead of John. But some way or other there was a mixup. They didn't get the correct -- wait a minute. Let me think. John signed the report and I should have signed the report, and then we were --

Q When you say John --

A John Romanin. He signed it and I should have signed it. I think that was one of the first reports we went in. I called down here and somebody said I had to get the reports in.

(Discussion off the record.)

BY MR. THOMAS:

Q Again, my understanding is that you want to have your name removed as an officer of this committee.

A Right.

Q As the Treasurer.

I would assume that it would be adequate if you drafted a letter and sent it to the attention of the Federal Election Commission and stated that effective that day, you wanted to have your name removed as the Treasurer of that

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committee. That should be able to serve as essentially an amended statement of organization. I would think that would be adeuqate to protect your interests in this matter.

We have now located a statement of organization amendment, and it is dated January 13, 1981. It is the amendment which purports to change the Treasurer of the committee to yourself, S. King.

I would prefer at this point, just for expedience, not to have to mark all of these as Commission exhibits. They are in the public record.

A Okay.

Q But I am now showing that statement or organization amendment to you. Can you identify that as the first time that you ever signed a report to the Commission for the committee?

A I believe so.

Q You are saying that from that point on there were other cases when they asked you to sign documents?

A Right.

Q You did so against your will or --=

A No, no. When he first asked me to do it, I said fine. Let's put it this way: "We need a Treasurer for NRCC.

Do you want to do this?" I said sure, and then I signed. Then I realized that they had a problem. Unfortunately, I don't know when I realized that they had the problem. Probably after the 31st. Wasn't there a report signed on the 31st that came in?

Q Of 1981, July 31st?

A No, no. Wasn't there one on January 31st? Isn't that the end of the year that we had to sign one, the 31st of January?

Q Yes.

MR. MIMS: That was the year-end report.

THE WITNESS: I think I did that, and I signed it. That is the one John should have signed?

MR. MIMS: The year-end report was due January 31st. So if you became Treasurer on January 13th, then you could have signed that report, if you filed it after January 13th.

THE WITNESS: I think I signed all of the reports that were filed.

MR. MIMS: Romanin did sign some.

THE WITNESS: Okay. Would you tell me which ones he signed? He signed this one.

BY MR. THOMAS:

Q That one being the one covering the period from July 1, 1980 through September 30, 1980.

A Now I did this one.

Q You did that one?

A I worked it up. He signed that one. The next one would be December, the end of the year?

Q What you are looking at now is a report covering the period June 30, 1980 through September 30, 1980, but it is dated and signed on February 25, 1981. That report was submitted with the committee's response to the Commission's notification of a possible violation. It was filed much after the fact, essentially, as an amendment.

A Okay. Yes, I did that.

MR. MIMS: Prior to the time that you assumed the office of Treasurer, did you have any other position with the committee as, for example, custodian of books?

THE WITNESS: Let me explain to you the situation. I worked for Media America as the officer manager and the accountant and I also did NRCC's books. The books that we had at that time, we did not actually have a set of books. We didn't set up a set of books. We were supposed to, but

we never got around to it. We sent out several mailings and the money came in and we batched the money together and put it in the bag. I was responsible for that. Then we paid out moneys from a checkbook, and we had -- I think the first bank account we had was with the First Virginia Bank. Was that it?

MR. MIMS: Just a moment.

THE WITNESS: Don't take this down.

(Discussion off the record.)

THE WITNESS: When I went there, Karen had deposited $300. I deposited all the money from the $300 on.

BY MR. THOMAS:

Q Karen?

A Dent.

MR. MIMS: She was originally the Treasurer?

THE WITNESS: Yes. I replaced her.

MR. MIMS: According to a statement of organization which was dated February 25, 1981, which was made effective back to July 23, 1980, you are listed as the custodian of records.

THE WITNESS: Yes. Yeah, I started to work July 23rd

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of 1980 and I did take over the bookkeeping, such as it was.

BY MR. THOMAS:

Q You indicated that there was supposed to be a separate set of books set up. Was that a separate set for the committee that you were referring to?

A Yes.

Q Why did that never take place?

A We never hired an accountant to give me the chart of accounts is why. You see, when I went to Media America, Media America had had an embezzlement. The bookkeeping was like eight months behind. Frankly, I didn't have the time to get the other, you know, NRCC's books set up.

Now I did get the filing system set up, but to actually do the bookkeeping I didn't. But what I did was I kept records of all the deposits. I photocopied every check that came in with my deposit slips, and then I also -- they ran me a printout of the people who contributed and I had a record of that. That was set up in the filing system. But Wally Brill was supposed to come over and do our audit and then he was going to show me exactly how to set up the books. I had never kept books for a committee of any sort,

so I did it that way, with the understanding we would go back and correct it. Then, of course, we got into the problem of being investigated, or whatever we are doing, and it all stops. I mean, there were no more mailings. There were no more moneys coming in.

I think we had a little bit of money in the bank, and what we paid was the telephone bill and Curtis Herge.

Q What kind of a procedure did you have for separating the various expenses that were incurred on behalf of the committee, the National Republican Candidates' Committee?

A You mean like the rent?

Q All categories of expenses that you can explain.

A Which one do you want to take first? Staff salaries?

Q Staff salaries would be fine.

A Staff salaries, for instance, if I spent -- and in some of these reports -- let's go back here and get one and I will explain it better.

MR. MIMS: I think just before this, just before the regular Xerox pages --

THE WITNESS: Let's take this one, November 26th. Secretary, receptionist, answering the telephone, 40-hour

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week, $160. What I did was this: I took and figured out how much our receptionist who worked for Media America was answering the phone for the committee and how much of my time was spent in answering the phone for the committee. Then Anita Gosain set up the files. I actually took the time that she worked and that we paid her for and billed the committee. Then filing at $4 an hour. That was the same thing. The supplies, I ordered the supplies for the committee through Media America's charge account because we didn't have one at that time for the committee and then I listed it down. Key punch, I got that from John because I didn't know. The key punch I think is when they put the names into the computer, and he gave me that. The Xerox machine, that was the copies and the supplies to take the copies of the checks that we deposited in the bank. And the IBM typewriter, the file cabinet, the desk and desk chair was what we actually charged them for a typewriter, a desk, a desk chair, and a file cabinet.

Q You say "we charged them."

A Media America charged them.

Q The committee?

A The committee. Down here it says accounting,

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general office. I have S. King, 8.24 times 3 hours. The FEC reports, caging and batching, and bank deposits.

Q Those are your hourly service charges which you computed for the time you put in for those various functions?

A Right.

Q Was there ever any discussion between you and either Mr. Romanin or Mr. Geske as to how to keep track of this?

A He asked me how.

Q He asked you to come up with the method?

A He asked me how to do it. I actually took the hours -- for instance, when we were real busy on the batching, one time it took three of us I think like a day or so because the checks would come in in like $5 amounts, $10 amounts, $20 amounts, and we would have a slew of them. I was off one day and "Bunny" sat down and did the checks and did them all wrong because she didn't keep a record of them when she listed them. We had to go back and list them all over again.

What we did was we actually took the checks, listed them, took photocopies of them, which made more work, but after all, if you don't have a set of books set up, you

have to do something, because if somebody would ask you where did the money go to or who gave you the money, you have to have something.

Q Let's backtrack a little bit. Can you just give an overview of how Media America is organized? Who are its officers, and so forth, and how are its decisions made?

A Geske is the president. Romanin is the vice president. I don't know who the other officers are. I think Rhonda Stahlman is something, but I am not sure what.

When you say organized and who does the decisions, the decisions are all made by D. Richard Geske. He makes all the decisions concerning that company.

Q Does Romanin make any decisions?

A Truthfully, not really.

Q What is his function? What is his role there?

A He is an administrative assistant, which means that he does anything and everything that Rich wants him to do. But basically speaking -- well, he quit last year and he has quit again, from my understanding. He quits every October.

I can assure you no, he doesn't really make decisions. Geske tells him what to do. He is simply paid, just like

I was paid, and he does what he is told, and that is exactly about what it is.

Q Media America is a corporation; is that correct?

A Yes.

Q Do you know who owns the stock of the company?

A Yes.

Q Who is that?

A D. Richard Geske.

Q Is there a board of directors?

A Yes, I think there is. They have meetings occasionally, but I don't know who they are either.

Q Do they make any of the business decisions of the corporation?

A Well, they might, but I think that since they own such a little amount of stock -- and I think at one time NCPAC owned stock. If I remember right, they owned shares and we bought them back. I can't remember if we paid $2,000 or $2,500 for them, but it was a very low amount.

In other words, you have to have so many shares of stock being outside yourself in order to be incorporated. I believe that is all that is out.

I think Maizel Shortley is an officer at Media America.

1 That is Terry Dolan's sister. I think Rhonda. I don't
2 know who else.
3 Q Rhonda Stahlman?
4 A Rhonda Stahlman.
5 Q Do either of the latter two persons have any decision-
6 making role?
7 A I have never even met Maizel Shortley. I don't
8 think Rhonda Stahlman does either, but I don't know because
9 I have never been to the board of directors meetings. In
10 fact, to actually see them come in and go to a board of
11 directors meeting, I have never seen that. But I understand
12 they had one around Christmas of last year. But again,
13 I really don't know.
14 Q There was a list of names that was provided either
15 in the response of the committee to our notification of
16 a possible violation or by you to me over the phone. I
17 wondered if you might clarify, to the extent you know, what
18 position any of these people had with Media America and
19 also what role, if any, they played with the company.
20 J. Curtis Herge.
21 A He is a lawyer.
22 Q Was he an officer or director, to your knowledge?

A No, no. He was the lawyer he hired after he got into the problems. He had another lawyer, but I don't know what happened there. All I know is that Herge is the one that he has now.

Q To your knowledge, did he have any role with the committee, the Republican Candidates' Committee?

A No. He was just an outside lawyer hired to get Geske out of the mess that he got into, I think. That is the extent of it.

Q How about an individual named Dennis Davis? Did he have any position with the company or with the committee?

A I never even heard of him.

Q Michael Hughes?

A I have never heard of him either.

Q You have indicated Maizel Shortley. With regard to Maizel Shortley, did she have any role with the committee as distinguished from the corporation?

A Not that I know of, because you see, I have never met her either. Now I know that Geske talked to her, but I don't know why or about what. I understand that he and Terry and she are all friends. Of course, he and Dolan shared a house together for years, until the IRS got after

1 Dolan and Dolan moved out. So Maizel Shortley is Dolan's
2 sister, I think. I am almost positive of that. But to
3 the best of my knowledge, I have never seen her. I have
4 only seen Terry Dolan twice and Rhonda I know. Rhonda comes
5 in and out. But I don't think they sit down and have board
6 meetings per se.
7 Q Does Terry Dolan, to your knowledge, have any
8 official position with Media America or with the Candidates'
9 Committee?
10 A No, no, not that I know of. They are just friends.
11 Q How about Tere Linehan? What position, if any,
12 did she have with the company and/or the committee?
13 A Tere Linehan is in charge of the phone bank fund-
14 raising part of the company. She was there when they organized
15 the committee. I was not. You know, evidently they all
16 sat down and thought this up a long time before I got there.
17 Q You actually got there when?
18 A July 23rd.
19 Q Of 1980?
20 A Yes.
21 Q That is when you first became employed with the
22 company?

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A With Media America. But Tere has been with Geske for about three years, three years January. So I mean, she was there when it all started out or they formed the committee, she and Karen Dent and Rhonda and Geske and so forth, I mean the whole company.

Q What sort of duties does she perform for the company?

A She runs a telephone phone bank, and what this is -- have you ever received a call from a candidate or from a cause wanting you to contribute money? That is what she does.

Q How about with the committee? Did she ever have any role with any of the committee's activities?

A No.

Q She never helped with any of the solicitations or preparing the solicitations?

A No. All we actually did, we only sent out the mailings. That is solicitation, but it is not like ringing the phone. We sent the mailings out and they were printed in the bank. At the time we did this, it was under the supervision of John, Rhonda and Hal Stalvik.

Q Who is Hal Stalvik? What position did he have with the company, if any?

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A He was in charge of the computer services is what they call it. He was actually in charge of the bank, running the machines to print the information, the package.

Q He actually helped with the mailings for the Candidates' Committee?

A What he did, he sent them out. I mean, he was responsible for getting -- well, Geske made the package up, I think. Somebody wrote it up. I think Geske wrote it up. Hal was under John. Therefore, Hal took the package as an incoming job and packaged it and sent it out.

Q Just to follow up on one more individual whose name you have given me, Wally Brill. What position, if any, does he have?

A Wally Brill was the CPA for Media America.

Q To your knowledge, did he have any participation at all with the activities of the committee?

A No. The only thing he had was I called him and asked him could he give me a chart of accounts for the committee. He did send me a chart of accounts so that I could set up, you know, a set of books. But that was the extent of it.

Q That is what you were referring to earlier?

1 A Yes, Wally.

2 Q You have indicated you think that the Candidates'

3 Committee was set up sometime before July 23rd when you

4 became employed.

5 A Yes.

6 Q To your knowledge, who actually was responsible

7 for setting it up?

8 A Well, according to rumor, Tere Linehan said that

9 John Romanin and Geske and Karen Dent. Now to my way of

10 thinking, I think Richard Geske set it up on -- I think

11 he got the idea.

12 Would you wait a second?

13 (Discussion off the record.)

14 BY MR. THOMAS:

15 Q What activities did the committee actually carry

16 out? What was the scope of its activities?

17 A You mean what did they do?

18 Q What did they do?

19 A Well, they sent out mailings. They collected

20 money.

21 Q How many mailings did they send out, do you recall?

22 A Three or four, I think. I am not really sure

about that, but I think it was three or four.

Q Did you ever see any of the actual mailings, the text of any of the mailings that went out?

A Yes.

Q Do you recall what those mailings stated? Were they asking various individuals to contribute to the committee or to contribute to other candidates? How was that working?

A Would you go off the record again?

(Discussion off the record.)

THE WITNESS: I am not sure, but I think one went0out that was asking to help -- something about Reagan's campaign debts, and to help offset the campaign debts, or something like that. They were all on that similar line, asking people for money.

BY MR. THOMAS:

Q For money to be sent to the committee, the Republican Candidates' Committee, or to the various candidates? Do you recall that?

A I think the money was to be sent to us.

Q The committee?

A Yes, the committee.

Q Do you recall if any mailings were sent out before

1 the election in November --

2 A Oh, yes.

3 Q -- as distinguished from after?

4 A Now wait a minute. I think they were. It should

5 say in here. Maybe they weren't.

6 Q One of the documents provided to us by the committee

7 in response to the Commission's notification includes an

8 apparent billing dated October 27th from Media America to

9 the National Republican Candidates' Committee. It refers

10 to a drop date of 10-25 and 10-26. Does that refer to dates

11 that the mailing was made?

12 A Yes. That is when the mailing went out.

13 Q Your best recollection is that that mailing asked

14 that moneys be sent to the National Republican Candidates'

15 Committee?

16 A Yes.

17 Q Are there any other --

18 A All of them did. I mean, we didn't ask for send

19 your dollars to Ronald Reagan or, you know, to John Doe.

20 It was send the money back to us.

21 Q Do you recall any discussion after you came aboard

22 as to what the purpose of the Candidates' Committee was?

A Well, what I thought the idea was was to collect money to help elect certain representatives. I think we did give 10 people donations of $500. What I actually thought the idea behind it was was to more or less be another NCPAC, you know. And I am sure you have heard Terry Dolan get up and say he had a million dollars to defeat any candidates. I thought that was the idea behind it.

Q Do you recall ever having any discussions with Mr. Geske about the activities of the committee?

A In what way?

Q Discussions about the planned mailings, for example.

A No. The only thing I really talked to him about was the percentage of response we got -- what we sent out, how many responses we got -- things to do with the accounting more than anything else.

Q Would he have these discussions with you at the office and during business hours?

A Yes.

Q To your knowledge, did any of the meetings or discussions about the plans or activities of the committee ever take place anyplace other than at the offices of Media America?

1 A Not that I was aware of. I mean, they may have
2 gone out and had lunch with the other people, but anything
3 that was discussed with me was discussed in the office.
4 Q Did you take your directions from Mr. Geske only?
5 A Yes.
6 Q From Mr. Romanin?
7 A No, dear. I didn't work for Mr. Romanin. No
8 way.
9 MR. MIMS: I would like to interject a question.
10 THE WITNESS: Sure.
11 MR. MIMS: When contributions were made by NRCC to
12 any of the candidates or any mailings were made on behalf
13 of NRCC requesting contributions to assist certain candidates,
14 were any of those candidates at the same time clients of
15 Media America?
16 THE WITNESS: I don't think any of them were ever clients
17 of Media America, that I know of, truthfully.
18 MR. MIMS: Do you have any idea how the candidates
19 were chosen?
20 THE WITNESS: No, I have no idea.
21 BY MR. THOMAS:
22 Q We have talked about your understanding of who

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was in control of Media America. What is your understanding of who was in control in terms of being able to make the decisions of the Candidates' Committee?

A D. Richard Geske. There is no getting around it. It was his committee. I mean, John may have made decisions and other people may have made decisions, but I certainly wasn't aware of them if they were being made. I mean, everything we did on the committee, the mailings, the whole bit, came from Geske.

Q What role, if any, did Karen Dent have in any of the decisionmaking?

A I imagine that she probably had the same thing I had, except that at the time she did, she collected $300. And to the best of my knowledge, I met the girl one day.

That was about it.

Q The services that Media America provided for the committee, to your knowledge, were any of the printing or other accounting or staff services provided to the committee from any source other than Media America?

A Not that I was aware of.

Q Media America essentially carried out all of the

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1 necessary staff support functions?

2 A When I was hired, it was understood that when

3 the committee got going, half of my salary would come from

4 the committee and half of my salary would come from Media

5 America. Eventually it was going to be the same way with

6 the receptionist.

7 At that time, that was all we discussed. I think

8 eventually we were going to get a fund-raiser, but that

9 was way down the road.

10 Q When you say you were going to get a fund-raiser --

11 A They were going to hire a fund-raiser or a director

12 or something, but that was way down the road.

13 Q Was this understanding about having your salary

14 be shared half and half --

15 A Eventually.

16 Q -- eventually, was that ever put in writing?

17 A No.

18 Q Was there ever anything actually of how you computed

19 the value of your services to the committee?

20 A No. I actually took -- the amount of my salary

21 was $8.24 or 25 cents an hour. I actually took that hourly

22 rate times the hours that I actually worked for the committee,

and that is how it was computed; the same way with the receptionist.

Q In terms of the computer services provided on behalf of the committee, how was it computed as to how much should be billed to the committee by Media America?

A They charge so much per -- the package rate, for instance, is so much to print the page. It is so much for affixing the stamp, so much for folding it. They come up with a rate, like 27, 30 cents per piece, and you just multiply that times the amount they send out. That is how you get the bill.

Q The computer service for printing up the mailing labels, for example, is computed into that cost?

A Right. If it is an affixed label, it is I think a penny or maybe two cents, something like that.

Q The Commission made its notification of a possible violation around January of 1981. Do you recall any discussions concerning the Commission's finding of a possible violation that you had with anyone that was associated with Media America or the committee?

A I am trying to think. You see, I thought the problem was later than that, because I had signed those

reports and sent them in and I wasn't aware of a problem until after the reports had gone in, because I know sometime in February I asked for my name to be taken off. When did we send that large --

Q This is a copy of that. As you can see, this is dated February 25th. This is a response of Mr. Herge to the Commission's notification of a possible violation. Included with that is a certification that the matters set forth in that response letter are true. You might note that that which is also dated February 25th has a signature line for you.

A Yes.

Q Do you recall signing that document?

A Yes.

Q I believe you indicated to me on the phone that you weren't given an opportunity to review the actual response itself. Is that true?

A That is right. I think it was a day or two later he said I might peruse this at my convenience, that that was the cover letter I had signed. I thought I was signing to take my name off.

Q Did he tell you that is what your signature was?

A Yes. That was the idea behind it.

Q Prior to signing this, you had requested your name be removed from the records?

A Right. That was the agreement there, that I was supposed to have my name taken off, because I know I sent the reports in. Then there was some problem. Somebody in the office said to me, "He took John's name off to protect him. He puts yours on. You have had it." I said, "No way." So I asked him to take it off. That is what we were supposed to be doing. Then he gave me the report to sign -- I mean to read -- after I had signed the cover sheet.

Q Did you ever get a chance to read it and then did you in fact read it?

A No. I didn't get time to read it all. He took it back the next day. He gave it to me late in the afternoon and came and took it back the next day.

Q You had already signed the letter indicating that the statements in the earlier response were true?

A But I hadn't read it. I didn't even see it until later. In fact, I thought I was signing to get my name off as Treasurer.

Q Also, just for purposes of clarifying, included

as attachments to this February 25th response, submitted by Mr. Herge, were copies of amended statements of organization and reports of receipts and expenditures. We have already had you identify some of these. As you can see, the first that bears your name is the statement of organization amendment listing you as Treasurer and changing the name of the committee to the National Candidates' Committee. Am I right, it is your recollection that you did in fact sign these reports?

A Yes.

Q How did that come about? Did they present that one letter that you signed along with the various reports and ask you to sign all of0them at once?

A No. I signed the reports, and John and Rich were in his office, and he called me in and --

Q Rich?

A Geske. And I think the way it was put, "We decided to take your name off as Treasurer and we are going to put John back on," and so we signed, and that was it.

Q You signed that letter jointly?

A I signed the cover sheet to the letter and then I think it was either the next day or the following day he said to me, you know, "You signed it that you had read

1 this." No, what he said is, "You might peruse this at your
2 leisure. This is the" -- I can't remember what he said.
3 But what he meant was this is what you signed that you had
4 read, because I got very vocal about it and went out and
5 told Tere Linehan what an s.o.b. he was; that I had signed
6 it, I hadn't read it, and he was supposed to have taken
7 my name off and he didn't.
8 Then when it came time to sign the one in July, I think
9 that was the next report --
10 Q I believe that is correct, yes.
11 A -- I said to him again, "I thought my name had
12 been taken off. You said we had sent it in."
13 "Well, Mrs. King, we only have until tomorrow to send
14 it in and, therefore, we just didn't get your name taken
15 off, so you will have to sign it."
16 Q This is while you were still employed with Media
17 America?
18 A Yes.
19 Q And you did in fact sign; is that correct?
20 A I did sign it.
21 Q Then it was after that that you and I had our
22 first communication.

A Right; because you see, it was becoming very obvious that he wasn't going to take it off. I called a lawyer who is a friend of mine and he told me to go down. I said, "You know, if I go down, I can no longer work here."

Q When you say "go down," you mean to the Commission?

A To the Commission. So that is what I did.

Now can I read the report I signed?

Q You certainly may.

A Okay, fine.

(Discussion off the record.)

THE WITNESS: When Media America had the job order from NCC, we billed them, and then when we collected moneys from the mailings, we paid the bills.

BY MR. THOMAS:

Q Would you clarify your "we's" there? Media America would bill the committee and then the committee would turn around and pay the bills?

A Pay any other bills we had to pay, the telephone bills, whatever.

Q You were more or less responsible for making that judgment as to when to pay and how much to pay?

A Right. I was responsible.

1 Q Did you have any discussions with Mr. Geske about,
2 for example, disputes as to how much should be paid and
3 when?
4 A Yes. We would talk about that, yes.
5 Q Do you recall him ever saying, "No, don't pay
6 this now, pay it later," and you disagreeing with him?
7 A No. Usually he would go along with that.
8 Q Was that the kind of situation where he would
9 come to you and ask you what you thought should be done?
10 A No. I would have so much money in the bank account
11 and then -- you see, I collected the money for Media America
12 and I always made everybody pay their bills, and that included
13 the PAC, because well, if they had $4,000, $5,000 in their
14 account, they might as well pay some. Or, for instance,
15 when we sent out the contributions to the various candidates,
16 I think there were 10, and we sent out $500 apiece to them,
17 or it may have been more than $500 apiece, but, you know,
18 he did discuss that he wanted to send that out. But then,
19 of course, he also had to pay some on the bills to Media
20 America from the committee.
21 Q Those decisions as to which candidates to give
22 contributions to and how much, who made those decisions?

A I would say Richard Geske did.

Q Did you, yourself, make those kinds of decisions?

A No, no. I didn't even know the candidates. I am not at all politically minded.

Q But specific discussion with Mr. Geske about whether to have the committee pay off part of its bill to Media America, you don't recall any specific disagreement, for example, in the approach you had with Mr. Geske about that?

A Hold a minute.

(Discussion off the record.)

BY MR. THOMAS:

Q Go ahead.

A Mr. Geske and I would decide how much money the committee was going to pay to Media America on its overdue invoices.

Q Do you ever recall any discussions with Mr. Geske or with any of the other persons working for Media America, or for the committee, about possible federal election law problems resulting from the overlap of staff and personnel of the company and the committee?

A Yes. I think Geske said, and I don't remember when this was, that he was having trouble and that the idea

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was that the committee should be separate from Media America, and at that time -- wait a minute. I don't know when we last sent the last bill for the use of the office space.

(Discussion off the record.)

BY MR. THOMAS:

Q Could you give some sort of description of how the office space was allocated between the committee and the company?

A The committee's office was the conference room and it was being used by Media America's secretary, the filing room, the coffee room, the water cooler, and there was a phone in there for Media America. There was a phone in there for the committee. There was a phone in my office, which was separate, for the committee, and there was a phone in the reception area for the committee. The filing room, which was the conference room at that time, was also Media America's filing room.

Q In other words, what you are saying is that for each piece of space that was to be used by the committee, it was at the same time being used by Media America?

A That is right.

Q For non-committee functions?

A The committee did not basically have a room by itself. They didn't have an office. They had three phones. Everybody just sort of switched around.

Q Were the phone charges, costs, of the committee billed --

A Separate. They had their own phone.

Q They were billed to --

A -- the committee.

Q The committee paid that separately?

A Yes.

Q You have referred to a rent payment. We have a record of a rent payment on December 1st, 1980 and on January 12th, 1981 to a Mark Winkler Management Company. What did that rent payment represent?

A That represented the payment for the conference room space that was supposed to have been used by the committee, and that was a portion of Media America's rent payment to Mark Winkler.

Q Was there ever any effort made to apportion any of the other costs of renting space to the committee; in other words, other than trying to apportion out this rent of this conference room? Was any of the other office space

of Media America charged as rent?

A No, no. You see, they were supposed to have the conference room and they were supposed to pay $275 a month for it, plus the desk, the telephone, and the typewriter, and whatever, and their filing cabinet. But it never came to be. It was just they started decorating the offices with Sloane and the secretarial desk came in and it was the wrong one, so the secretary was moved into the conference room.

(Discussion off the record.)

BY MR. THOMAS:

Q With regard to Media America and its relationship with the committee, it is our understanding that the company provided many services and that the committee then was billed for those services and even as of this date there are many debts outstanding as to what the committee owes Media America.

Did Media America enter into any similar kinds of client relationships with other committees during that period of 1980?

A Wait a minute.

(Discussion off the record.)

BY MR. THOMAS:

Q Without naming names of any other specific clients, can you tell me if there were any other instances when Media America advanced services to a client and then waited a long period of time for repayment?

A Yes.

Q If you can mention approximate dollar amounts for some of those so we can get some sort of perspective as to how large some of the other types of outstanding debts were that were carried.

A Some of them were between $60 to $70,000 for one particular group. Another group went as high as $120,000. Another group was up about $35,000.

Q In any of those instances that you are referring to, was the group that was involved in any sense organized by or controlled by the same group of individuals as controlled Media America?

A Wait a minute.

(Discussion off the record.)

THE WITNESS: Just Rhonda Stahlman.

BY MR. THOMAS:

Q To your knowledge, did the National Republican

0 3 0 4 0 4 3 5 0 1 1

1 Candidates' Committee ever bid for a contract for the services
2 that it wished to have provided?
3 A No.
4 Q Who would have made that decision, to your knowledge?
5 A It would have either been Geske or Romanin, one
6 or the other of them.
7 Q Do you know how it was decided who would receive
8 these mailings on behalf of the committee?
9 A When you say who received them, what do you mean?
10 Q Who would be given these letters and how was that
11 decided? Who would they be mailed to? In other words,
12 how was the mailing list selected?
13 A I think they bought a mailing list.
14 MR. MIMS: Bought it? Would you know from whom?
15 THE WITNESS: No. But I think there are people who
16 sell mailing lists.
17 BY MR. THOMAS:
18 Q When you say they bought a mailing list, do you
19 mean Media America bought a mailing list?
20 A Media America would have bought a mailing list,
21 I am sure. That is the way it was generally done. Some
22 committees have their own mailing lists, but since this

1 particular group -- wait a minute.

2 (Discussion off the record.)

3 THE WITNESS: I don't know what lists were used or

4 where they came from, but Hal Stalvik would probably know.

5 BY MR. THOMAS:

6 Q Earlier I asked you if you recalled any conversations

7 with Mr. Geske or anyone else working with Media America

8 about the need to maintain this separate appearance of the

9 committee. Do you recall any other discussions about that?

10 A Well, they were supposed to have their own space

11 and their own people and their own phones and their own

12 desk and they were supposed to be a separate entity, but

13 they weren't.

14 Q What are you basing that statement on? Is that

15 based on conversations that you did have with Mr. Geske?

16 A Yes.

17 Q He indicated that that was how it was to be set

18 up?

19 A Yes; that they were to have their own bookkeeping

20 system, their own bookkeeper and, you know, the receptionist

21 was to answer the phone so much for them. In other words,

22 they were to have their own payroll system and everything.

1 The only reason we hadn't set up the payroll system was
2 because it was just beginning, and so we billed them through
3 Media America. But eventually, for instance, half of my
4 salary would have come from the committee and half of it
5 would have come from Media America. But it never materialized.
6 Q To your recollection, was this discussion that
7 you had with Mr. Geske about maintaining this separateness,
8 was that discussion had before the notification came from
9 the Commission that there was a possible violation involved?
10 For example, did it date back to shortly after you came
11 aboard at Media America?
12 A I do remember him saying that NRCC had to have
13 its own file cabinet, and it did have its own file cabinet,
14 with its records in the file cabinet and its checks in the
15 file cabinet. That was kept separate. But I understood
16 that they were to have an office by themselves, which never
17 happened.
18 MR. MIMS: Did you have access to all the records?
19 THE WITNESS: Yes. Well, wait a minute. I had access
20 to all the records except what were kept in the bottom of
21 Geske's credenza.
22 MR. MIMS: What might that have included, as generic

as possible? What kinds of categories of records?

THE WITNESS: All the letters from the FEC, all the responses from Curt Herge, the bank book. The bank reconciliations were in there, and other miscellaneous information.

MR. MIMS: Did you actually do the reconciliation?

THE WITNESS: Of the bank books, yes.

MR. MIMS: So nothing would have transpired in that way that you wouldn't have known about?

THE WITNESS: No.

BY MR. THOMAS:

Q Your recollection is, though, that some of these conversations with Mr. Geske did take place before the Commission's notification came?

A I think so, yes, because we set it up basically that way, you know, with the idea that the conference room, they were going to rent the conference room. And at the time we were talking about this, we had a file room, and then the file room was moved into the other room so we would have another office. Then I moved from my office into another office and the file room was moved back into another office. Now, there are other people there in the conference room.

1 So basically what happened was NRCC was just sort of pushed
2 around, moved around I should say.
3 Q We might as well go ahead and clarify, and I think
4 you have already referred to this, but to the extent there
5 was separateness, there was a separate file drawer for NRCC.
6 A There was a separate file cabinet.
7 Q File cabinet, or drawer within a file cabinet?
8 A There was a separate file cabinet. And when I
9 left Media America, NRCC had a file drawer in a cabinet
10 in the Media America file room. But at the time the committee
11 was active, they had their own file cabinet and their own
12 telephone, and that was all they had.
13 Q When you say their own telephone, do you mean
14 a separate telephone or do you mean a separate push button?
15 A They had a separate push button on the set, that
16 was it.
17 Q So there was no additional phone installation
18 of any sort for the committee's operations?
19 A Yes, yes. The telephone company came over and
20 actually brought the line in, and it was listed in the
21 directory as the National Republican Candidates' Committee.
22 The only thing was it was set into our sets. We could just

1 answer the phone for all of it.

2 MR. MIMS: I suppose one of the last questions I had

3 was in your examination of the response filed by Mr. Herge,

4 was there anything in here which you find from your knowledge

5 you couldn't agree with, or any additional information that

6 you might like to add, from your personal knowledge, to

7 this response?

8 (Discussion off the record.)

9 THE WITNESS: Page 2 of the response of February 25th --

10 (Discussion off the record.)

11 MR. MIMS: Referring to page 2 of the response from

12 NRCC dated February 25, 1981 --

13 THE WITNESS: Media America did finance through credit --

14 (Discussion off the record.)

15 THE WITNESS: They did finance through the credit

16 and they did administer through Mr. Geske and they did control,

17 so it really wasn't separate. It was like a subsidiary

18 of Media America is what it was.

19 (Discussion off the record.)

20 BY MR. THOMAS:

21 Q Mrs. King, could you tell us the names of any

22 employees of Media America who worked for Media America

during the time that the Republican Candidates' Committee was active?

A Yes. Bernadine Wheeler. We called her "Bunny."

Q What position did she hold?

A She was a secretary/receptionist.

Tere Linehan. She ran the phone bank. Jack Kanak. He is a salesman, more or less. Then we had Carolyn J. Phelps. She was a secretary. That would be about it.

Q One final area of inquiry. You have indicated to me in our phone conversations that you no longer are employed by Media America.

A No.

Q Could you explain to me how that came about and the circumstances under which you are here speaking with us today?

A I asked Mr. Geske to take my name off of the committee. I was told that it was off. And when we signed the July -- was it the 31st? --

Q Yes.

A -- the July 31st report, again my name was still on it. I asked him to take it off again, and he just walked out of the room.

The second problem with Mr. Geske is that I was hired on a 28-hours-a-week basis. I now have overtime -- wait a minute.

(Discussion off the record.)

THE WITNESS: I asked him to take my name off, and the other reason behind my resignation was the fact that I was hired on a 28-hour week basis and there was always a dissension over my Fridays off, plus the fact that I am tired of working 40, 60 hour weeks. I gave two weeks' notice.

On the 15th of September, we got into quite an argument about my overtime, comp time, which when I worked comp time I was told if I left, I would either be paid for it or given vacation time. He told me at a quarter after four I could have forty-five minutes comp time and go home, and I did.

MR. MIMS: Was there any reference during this conversation to your responsibilities as Treasurer or any Commission actions, investigations?

THE WITNESS: No. I don't think Mr. Geske wanted to take my name off. I don't think there was anybody else that would sign it to be Treasurer.

BY MR. THOMAS:

Q I want to be clear on this, though. You had given your notice of resignation prior to at any point being told by Mr. Geske to take your comp time and go home?

A Yes.

Q Are you saying when he told you that, that effectively he was saying "Go home, you are through here"?

A Yes. He took my keys.

Q But you had already given notice?

A Yes. My two weeks' notice would have been up on the 17th.

Q And a dispute developed as to whether you would get compensated for your comp time and overtime; is that correct?

A That is right.

Q Despite that disagreement that you had, is any of the testimony that you have given today in any way false or incorrect in an effort to try to in any way get even with Mr. Geske for any disagreement you may have had?

A No. And I think if you will check out the other people that I mentioned, I think that they will tell you the same thing.

MR. THOMAS: Thank you very much for your time.

THE WITNESS: You are welcome.

(I have read the foregoing pages 3 through 49, inclusive, which contain a correct transcript of the answers given by me to the questions therein recorded.)

SHIRLEY ELAINE KING

- - -

CERTIFICATE OF NOTARY PUBLIC

I, Karen Hinnenkamp, the officer before whom the foregoing deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken by me in shorthand and thereafter reduced to typewriting by me; that said deposition is a true record of the testimony given by said witness; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken; and further that I am not a relative or employee of any attorney or counsel employed by the parties thereto, nor financially or otherwise interested in the outcome of the action.

Karen Hinnenkamp

Notary Public in and for
the District of Columbia

My commission expires:
July 31, 1983

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Washington, D. C.

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July 23, 1982

Jonathan Levin, Esq.
Federal Election Commission
1325 K Street, N.W., Suite 700
Washington, D.C.

RE: NATIONAL REPUBLICAN CANDIDATES' COMMITTEE, et al.
DEPOSITION OF JOHN D. ROMANIN - DKT. NO. MUR 1363
MAY 21, 1982

Dear Levin:

The deponent has been notified by letter dated June 4, 1982 of the availability of the original copy of the above referenced deposition for reading and signing in our office.

As of this date, we have not heard from the deponent requesting an extension of time nor indicating a desire to read and sign the transcript. Therefore, the original copy (unsigned) is being forwarded to the court for filing.

Sincerely,

Fred R. Joyce,
General Mgr.

cc:
file
court

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**Milton Reporting, Inc.**

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June 4, 1982

John D. Romanin
1493 Chain Bridge Road
Suite 101
McLean, Virginia

Re: NATIONAL REPUBLICAN CANDIDATES' COMMITTEE, MUR 1363

Dear Mr. Romanin:

On behalf of counsel who took your deposition on May 21, 1982, you are hereby notified that the transcript of your deposition is now ready and available at the above address for reading and signing.

As I understood Mr. Levin, he indicated that he would be in touch with you about the reading of it.

Any changes in the transcript should be noted on an errata sheet. The errata sheet should then be signed by you, notarized, and returned to Fred Joyce at the above address.

If you prefer to come to our offices for reading and signing, please, contact Mr. Joyce to make arrangements.

If by July 5, 1982, we have not received any request for extension of time or otherwise heard from you, it will be assumed that reading and signing are no longer desired, and the deposition will be filed.

Sincerely,

Sandra Vinson

Sandra Vinson
Reporter/Notary

cc: ~~Mr.~~ Levin
FEC
file

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ORIGINAL

Before the

FEDERAL ELECTION COMMISSION

- - - - - - - - - - - - - - - - - - x
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In the Matter of: :
:
NATIONAL REPUBLICAN CANDIDATES' : MUR 1363
COMMITTEE, et al. :
:
- - - - - - - - - - - - - - - - - - x

Washington, D.C.

Friday, May 21, 1982

Deposition of

JOHN D. ROMANIN

a witness in the above-entitled matter, was called for examination by counsel for the Federal Election Commission, pursuant to notice, taken at the offices of the Federal Election Commission, 1325 K Street, NW, Washington, D.C., beginning at 10:00 a.m., before Sandra Vinson, a Notary Public in and for the District of Columbia, when were present on behalf of the respective parties:

For FEC:

Jonathan Levin
Attorney
1325 K Street, NW
Suite 700
Washington, D.C.

Stephen Mims
Legal Intern
1325 K Street, NW
Suite 700
Washington, D.C.

C O N T E N T S


| WITNESS | EXAMINATION |
|---|---|
| John D. Romanin | 4 |


E X H I B I T S


| FEC Exhibits Marked for Identification: | Page |
|---|---|
| FEC Exhibit 1: one-page document entitled Committee Meeting, dated August 18, 1980 | 24 |
| FEC Exhibit 2: Urgentgram from John D. Romanin dated 10-25-80, one page | 29 |
| FEC Exhibit 3: Invoice from MediAmerica to National Republican Candidates' Committee dated October 27, 1980, one page | 32 |
| FEC Exhibit 4: Urgentgram from John D. Romanin, dated 12-5-80; invoice from MediAmerica to National Republican Candidates' Committee, dated 12-12-80, three pages | 42 |


8 3 0 4 0 1 0 5 0 3 6

| Exhibits Marked for Identification (continued): | Page |
|---|---|
| FEC Exhibit 5: Letter from Steve Symms to Richard Geske, March 30, 1981, one page | 50 |
| FEC Exhibit 6: Letter from Theodore Major to MediAmerica, December 12, 1980, one page | 55 |
| FEC Exhibit 7: Letter from Theodore Major to MediAmerica, January 21, 1981, one page | 56 |
| FEC Exhibit 8: List of 1980 Republican senatorial winners, three pages | 62 |
| FEC Exhibit 9: FEC Schedule B for National Republican Candidates' Committee, two pages | 65 |
| FEC Exhibit 10: Form 941, Employer's quarterly federal tax return for MediAmerica, September 30, 1979, one page | 74 |
| FEC Exhibit 11: Balance sheet of MediAmerica, Inc., December 31, 1979, three pages | 88 |


* * *

Thereupon,

JOHN D. ROMANIN

a witness, was called for examination by counsel for the Federal Election Commission and, after having been first duly sworn by the notary, was examined and testified as follows:

EXAMINATION BY COUNSEL FOR THE FEDERAL ELECTION COMMISSION

BY MR. LEVIN:

Q. State your name and address for the record, please.

A. John D. Romanin, R-o-m-a-n-i-n, 1493 Chainbridge Road, one word, suite 101, McLean, Virginia 22101.

Q. And your present occupation?

A. President of Systems, Terminals and Communications.

Q. Were you ever employed by MediAmerica?

A. Yes.

Q. From what date to what date?

A. I would say approximately from May of 1978 to October of 1981.

Q. In what capacity?

A. My title was executive assistant.

Q. To whom?

A. Richard Geske.

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Q. Who was the ---

A. President.

Q. Did you have any other connection with MediAmerica? Were you a director?

A. I was on the board of directors. I was treasurer of the company.

Q. Were you one of the originators of MediAmerica?

A. Yes.

Q. So, your beginning date was the date MediAmerica commenced?

A. MediAmerica was incorporated and I started in May. It was probably incorporated in April. I'm not sure of that.

Q. You were one of the incorporators?

A. No. I wasn't. I came soon after it was incorporated. I was Rich Geske's first employee, you might say.

Q. What did your job entail as executive assistant to Mr. Geske?

A. Well, as the name might imply, our business was fund raising, political fund-raising, direct mail, capital fund-raising, soliciting contributions for candidates, non-profit organizations, not apolitical.

There were also administrative functions, hiring

and firing employees. My specific responsibilities were everything from direct-mail management to capital fund-raising, computer operations, purchasing, procurement for the company.

I'd say that's about it.

Q. So, you supervised a number of people?

A. Yes.

Q. And, you were supervised by one person, Mr. Geske?

A. Right.

Q. And, you say you left MediAmerica in October 1981?

A. Right.

Q. What was the reason for your leaving MediAmerica?

A. Primarily, it was a disagreement on management of the company, a disagreement on the way the business was being run, basically.

Q. From the standpoint of business judgement?

A. I would say that's it primarily.

Q. Did you feel that they weren't making enough of a profit?

A. Not at all. MediAmerica was very successful. It had to do, I suppose, with what direction the company was taking. That was the disagreement.

Q. What do you mean by direction?

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A. Direction in the business you make. There are various ways that decision-making can involve the type of growth, the way you want to grow, how you want to expand, and the product lines, et cetera. We disagreed on that.

Q. Did the National Republican Candidates' Committee -- was that of any substance in the matter?

A. No. I wouldn't say so. Not at all.

In fact, the candidates' committee was totally separate and was never anything of conflict between Rich and myself.

Q. Were you one of the originators of the National Republican Candidates' Committee?

A. In the respect that I was more or less designated as an officer. I believe that I was treasurer. But, yes, certainly.

The candidates' committee evolved between Rich Geske and myself and, I suppose, other people that we interacted with on the political spectrum.

(Discussion off the record)

Q. When was this?

A. That's a tough question. It must have been -- well, it was during the 1980 elections, but the date or dates

6 3 0 4 0 4 5 0 1 1

I don't know.

My involvement was strictly, as you might say, as a body. There was a suggestion of starting a PAC because of our interest in politics and Rich's interest in politics and wanting to support conservative candidates.

There was an investigation as to what exactly needed to be done to start the committee. We knew the requirements of setting up a committee, and we wanted to confirm those. We knew we were a corporation and we had dealt enough with PACs to know they had to be separated.

We had counsel, our lawyers, look into the matter of setting up the committee and we felt we met all the requirements. I would say the person we had doing all the paperwork, the bookkeeper -- who was the bookkeeper -- really didn't do a good and thorough job. Obviously, I think that was what caused some of the problem.

Q. They were separated? They were talking about a separate, segregated fund? Separate from MediAmerica?

A. What we were looking for, we were a small company, yet we wanted to become involved politically. We decided to set up a committee and we wanted to designate it as a separate committee. Somewhere along the line, we came up with a

political, multi-candidate committee.

Q. Kind of like the other corporations that have their own?

A. It's not like a corporate PAC. It wasn't meant to be. We identified it as a multi-candidate committee.

Rich and myself, again, we were involved politically on many levels. Personally, we felt there was a need for another committee, and that's when the candidates' committee was started. We looked at the situation and we looked at our position as individuals involved in politics professionally. We also at the time, and still are, very involved in politics personally.

We were in a position to know how to help a committee raise money, that type of thing. So, again, that's why we started it.

Q. Who was advising you on this at MediAmerica?

A. It was Rich Geske. It was his idea and I was very enthusiastic about doing something like that, so he set it up.

Sedam & Herge were our counsel. Herge is an FEC expert on the federal statute and understands those things. We felt that he was qualified in counseling us on how to start a committee.

As far as I was concerned, all I was doing for the committee was, number one, helping raise money and, also, signing reports. Unfortunately, I didn't go over those as thoroughly as I should have. I read them and everything and they looked to be in order to me. I didn't spend time on it.

I think I was treasurer of the committee. I was appointed it because, frankly, there was no one else to fill those positions. We were making attempts all along but, with the finances and start-up costs, we filled them.

Q. So, you and Mr. Geske discussed it. Was anyone else at MediAmerica in on these first discussions?

A. No.

Q. Basically, it was Mr. Geske's idea and you were enthusiastic and said, yes, I will join you on this?

A. Basically, that's the way it was. From then on, neither Rich nor myself had the time, but we knew we wanted to get it going. It was on the premise that soon after its start-up we would hire someone from outside to be a director of the PAC and, therefore, we wouldn't be involved in it.

Q. Did you ever do that?

A. No.

Q. How did it start up? How did you actually set up

1 operations?

2 A. All we did was file for the FEC reports and it was

3 started.

4 Q. Who was directed to do the work?

5 A. MediAmerica did the work. As far as any letter

6 production, MediAmerica did it. It had the facilities. We

7 were advised that that would be okay, if we were submitting

8 competitive rates and went out for other bids. In fact, I

9 think we did. I didn't do it, but I was advised we did that.

10 Q. To do what?

11 A. For the committee to go out and get competitive bids.

12 Q. Did the committee do that?

13 A. Yes. To my knowledge, yes.

14 Q. Who were the other bidders?

15 A. Offhand, I can't tell you. It might have been

16 someone like Automated Business Systems out in Oxon Hills. I

17 can't think of any right off.

18 Q. But these have been companies that actually

19 competitively bid alongside MediAmerica?

20 A. Right.

21 Q. What made you decide to choose MediAmerica?

22 A. Simply that we came in lowest.

BY MR. MIMS:

Q. Who submitted the bids for MediAmerica?

A. I don't think a bid was submitted, at least not a written bid. No written bids were given.

It was just a matter of facilities being there and MediAmerica was used for those projects.

Q. So, actually, who decided to use MediAmerica as a supplier of services for the committee?

A. Anyone who had final say. The final decision was Rich's. He was the one. I could make suggestions and suggestions were made, but I was in no position to overrule any final decisions on any of the material.

BY MR. LEVIN:

Q. Did you make any suggestions at that point?

A. Yes. I suggested that we shouldn't use MA facilities.

Q. Why not?

A. It didn't seem the right thing to do.

Q. For what reason didn't it seem right?

A. It was for the very reasons you are asking about here, about segregated funds or non-segregated funds.

Basically, we were in a position, or I was in a

position where I was the officer of the company and an officer of the candidates' committee. I didn't think that people in those positions, as decision-makers, should have been directing business to the corporation.

Really, the corporation was made up of two individuals, Rich and myself, and I don't think we should have been directing business that way.

Q. So, you thought the distinction was superficial in directing business to MediAmerica?

A. In deciding whether or not to use the facilities.

Q. In other words, it was a question of the committee using the facilities and you would have thought that maybe it would be difficult to make a distinction?

A. I don't know. I can't look at the documentation.

I can go back a little bit and say that we were involved in political fund-raising. We were advised that, if we started a committee, we would probably be the best people to advise the committee since we felt we were good businessmen and we had the facilities for raising support services, and the decision was made to use those facilities.

At the same time, we knew that the committee and MediAmerica, because of the principals, might have been thought

of as the same, that it was artificial, that this committee was set up with support services provided to the committee with that in mind at the outset.

I don't think that's the case, and I don't think Rich had that in mind either. We were -- again, just being very honest -- involved politically. We didn't like some of the things that were happening on the national level.

Q. What didn't you like about it?

A. Simply that certain individuals were supported over others. That's the fine line of political judgment.

There were candidates that we knew of that we simply wanted to support, and we felt that by having a committee we would be able to.

Q. Let me get this right.

MediAmerica did services for a number of groups, such as NCPAC and others, I guess you might say, of that orientation.

A. Conservative.

Q. You felt there was a need for another conservative group?

A. I would have to say that our primary motivation was to support conservative candidates and probably those

1 classified as very conservative to conservative.

2 Q. So, these are ones that other committees were not

3 supporting?

4 A. We certainly can't sit there. There is always

5 some reason behind some action.

6 Q. I'm just talking in general terms. I don't mean

7 in terms of the most detailed political feelings. I'm just

8 trying to get a sense of what it is that made you feel that

9 another group was necessary, and your answer would be? What

10 was that answer again?

11 A. We were Republicans. We didn't feel that the

12 conservative Republicans were being represented well. Not

13 represented, but supported well.

14 Q. About what time are we talking about when you said

15 there was a bidding process going on? Do you know what time

16 that was?

17 A. It was soon after the committee was started.

18 Whenever that was, I don't know.

19 Q. So, it would be shortly after July of 1980. Does

20 that sound correct?

21 A. Seems kind of late, but it was around that time

22 that the committee was installed. I guess that's true.

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Q. Did you discuss the workings of the committee well before you actually formalized it?

A. There was always talk about something like that. There was always talk about some type of body that we would be involved in that would help generate money for candidates.

Q. So, bidding might have started before July of 1980?

A. Actual bidding?

Q. (Nods)

A. No. I don't think so.

Q. Did you finally have any kind of start-up meeting where you had a number of people in attendance?

A. No. There was never any structure to the committee. It was really Rich coming up with an idea and my checking off on it. He was making the decisions and I was really just doing the follow-up work for him.

It was like there were times it was what we had to do because we were advised that anything we would do for the committee would have to be totally separate from MediAmerica. So, I felt it was kind of crazy. Then, I was familiar, again, with a lot of PAC reps who were involved on the business level and on the PAC level and knew you have to keep things separate, even if it involves leaving your office to discuss the matter.

I would say, if you want to refer to a meeting, it was usually over dinner or something like that.

Q. Let's get into that.

Would you have any discussions at all at work on this?

A. Well, sure. I suppose it would come up. It was never anything structured. We made a concerted effort to separate everything that we did from the candidates' committee. Between Rich and myself, we did that.

I guess, if we had any other meeting with other people, they were always separate from MediAmerica.

Q. Meaning away from the work place?

A. Yes.

Q. As you said, at dinner?

A. Right.

Now, I think that we had a designated area at the MediAmerica facility where we could actually meet, but I don't think we ever met there. We didn't meet in the conference room as such.

Again, anything done at MediAmerica, as far as Rich and myself are concerned, when we were discussing things, we would always make sure that we were somewhere else.

3 3 0 4 0 5 0 5 1

1 Q. Was Karen Dent involved at these?

2 A. Well, Karen Dent. Again, I'm not positive, but
3 Rich appointed her bookkeeper for MediAmerica. Since she knew
4 bookkeeping, she was designated -- I don't know what it was --
5 secretary or something for the committee. I don't know.

6 That was a sad thing, because Karen Dent was not a
7 very good bookkeeper. She didn't fill out the forms, and I was
8 signing the darn things. We got ourselves in a bind on
9 reporting stuff matters a couple of times.

10 So, eventually, Rich started reviewing the forms
11 himself and then I would sign the forms, because he was more
12 familiar with it that I. I simply didn't have the time.

13 BY MR. MIMS:

14 Q. Just a follow-up question on Karen Dent: when Mr.
15 Geske asked her to serve as treasurer of the committee, was
16 that a part of her job as an employee of MediAmerica or did
17 she serve during off hours?

18 A. No. Again, we were advised by Sedam & Herge that
19 anything she did would have to be completely recorded and
20 reported. She would have to keep track of the hours spent for
21 the committee and to discriminate when she was working for
22 MediAmerica and when she was working for the committee.

1 By the way, that brings up a point. Because of the
2 closeness of the committee and Rich and myself, we were advised
3 to keep track of our hours with the committee, and I do believe
4 that Karen was keeping track of our hours and I think that's
5 documented.
6 Q. Did she perform her duties as treasurer of the
7 committee?
8 A. Was she treasurer? I don't know.
9 MR. LEVIN: Let's go off the record.
10 (Discussion off the record)
11 MR. LEVIN: Back on the record.
12 BY MR. MIMS:
13 Q. So, the question I have with respect to Karen Dent
14 was, when she served as treasurer of the committee performing
15 functions on behalf of the committee, she did this as an
16 employee of MediAmerica.
17 Was she asked to do this for the committee or was
18 she instructed to do it as part of her job with MediAmerica?
19 A. Basically, that was the case.
20 Q. What was the case?
21 A. She was appointed.
22 I don't think there was ever a decision on Karen's

1 part of whether she wanted to or not. It probably became part
2 of her duties.
3 Now, I cannot speak for Rich, but he may have asked
4 her if she would rather not or would want to. Obviously, she
5 did, if she was asked that.
6 BY MR. LEVIN:
7 Q Did you say anything to her about that? About her
8 being treasurer?
9 A. I really don't remember, John. I don't remember.
10 BY MR. MIMS:
11 Q You served for a while as treasurer but, in the
12 interim, after Karen and you, Shirley King served as treasurer
13 of the committee?
14 A. Yes.
15 Q Was that also a part of her appointment, part of
16 her job at MediAmerica, to serve as treasurer for the committee?
17 A. Again, I think because of the closeness of the
18 functions -- okay, in answer to your question, yes.
19 I think I assumed those responsibilities after
20 Karen was gone and, as part of the transition, she took over
21 the bookkeeping duties as well as the work for the candidates'
22 committee that Karen was doing.

Q. Was there anyone else from MediAmerica who was asked to work for the committee outside --

A. No. Outside of?

Q. Contractural performance.

A. Contractural performance of services. No. Not that I know of. I don't think so.

Q. If either Karen Dent or Shirley King decided they would rather not do that, what would have happened?

A. Nothing, I don't think.

We would have to find someone else to perform the duty. I don't think Rich would have considered it a non-performance of duties. I think he was cognizant of the fact that they were separate and, if he felt it was impinging on her abilities to perform her duties at MA -- I think it was reasonable.

Q. Do you know whether this issue ever arose?

A. I really don't.

I know that Shirley King was often -- acutally, now that I think about it, Shirley King would cry about the work she had to do a lot. She used to complain quite a bit of the work overload and a lot of it did concern the candidates' committee. A lot of the reporting that had to be done and a lot

of the records that had to be analyzed were done after Karen left and, with the duties required of her by MediAmerica, she felt it was somewhat unreasonable.

Q. Do you know how her complaints were resolved?

A. I don't think they ever were.

BY MR. LEVIN:

Q. How many hours are we talking about that she would have to work over what she wanted to work?

A. Gee. (Nods)

You have to understand I used to walk past her office, usually after hours, and often she was there pretty late in the evening.

I honestly wouldn't be able to tell you whether she was working on the candidates' committee or on the incredible bookkeeping chores of MediAmerica.

I do know that she worked on the candidates' committee. As I recall, she did have some complaints fairly often that the candidates' committee was really causing her to work longer hours than anticipated when she came into the company.

Q. Who would pay her for working on the candidates' committee?

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A. I don't know. I do recall, in listening to some of the conversations between Rich and Ms. King, that the candidates' committee was paying her for the time she put in for the candidates' committee.

Q. Who was supervising her for when she was working for the candidates' committee?

A. Rich. But, loosely.

I think basically she was in charge of keeping the figures in order and the figures --

Q. Did you -- I'm sorry. Go ahead. Did you want to say more?

A. No.

Q. Did you supervise her?

A. Unfortunately, that was one of the problems with Rich. I didn't have anything to do with the books of the company or the candidates' committee and I suppose, because of the lack of knowledge that I had in keeping up with things, it was a concern of mine.

That was one of the problems with Rich, in that I was kept in the dark. I was in the very responsible position of making every major procurement for the company, hiring people, buying computers, taking on space, of really managing

3 3 0 4 0 4 5 0 3 7

1 the company, but I was never involved in any way with the
2 paper work on the company and, in particular, with the
3 accounting procedures.
4 I suppose he didn't want to hear that, but that's
5 pretty much the case.
6 BY MR. MIMS:
7 Q. When you signed the reports for the committee, did
8 you know whether the figures presented on the reports were
9 correct?
10 A. Well, I never really checked their veracity. I
11 looked at them and they looked correct.
12 I knew what we were contributing to the candidates
13 and I had an idea of what was coming in.
14 Q. I just want to go back a few steps.
15 When you were discussing with Mr. Geske about
16 accepting competitive bids, you said there was a problem there
17 because of the closeness of the corporation and the committee;
18 is that what you ---
19 A. Yes.
20 Q. What did Mr. Geske say to you when you brought
21 that up?
22 A. He said he checked everything out with Sedam & Herge

3 3 0 4 0 4 5 0 5 3

1 and that's all I needed to know to go ahead with the work.

2 MR. LEVIN: I'm going to ask the reporter to mark

3 this FEC Exhibit 1.

4 (The document referred to was
5 marked for identification
FEC Exhibit 1, a copy of which
6 is attached to the orginal
transcript of this deposition.)

7 MR. LEVIN: And, I'm showing a copy of FEC Exhibit

8 1 to Mr. Romanin.

9 BY MR. LEVIN:

10 Q. Can you identify FEC Exhibit 1?

11 A. Yes.

12 Q. What is it?

13 A. Rich asked me to come up with some names of people

14 that we could go to to help raise money for some additional

15 funding of the committee.

16 I don't remember seeing this. But, I think what

17 I did one night was to put together a list of some names of

18 some people. Actually this wasn't a very complete list.

19 BY MR. MIMS:

20 Q. Do you recognize the handwriting on this?

21 A. It's Pich's. Definitely.

22

9 3 0 4 0 4 5 0 3 6

BY MR. LEVIN:

Q. Could you explain the item 1.A., Initial budget $8,800?

A. I don't know how the figure $8,800 comes up. I don't have any idea how that was derived.

Q. Were you discussing about where you intended to get the money, the $8,800?

A. Rich and I did talk about going to individuals that we felt could give what we would call -- these aren't major contributions -- at least some start-up money for the committee.

Q. Are you referring to the individuals down here?

A. A number of these people are my friends.

Q. Who else was at this meeting besides you and Rich?

A. I see "First Meeting."

I don't think there was a meeting. Frankly, I think all Rich did was say: let's put together some names of people that you think you can raise some money from.

Frankly, it was a shabby effort.

Q. So, if there was a meeting, it would have been just you two?

A. Exactly.

Q. Do you remember a mail date in the week of

1 September?

2 A. Rich came up with a direct-mail program that he

3 put together, but actually, I think 1.A. was the cost for

4 sending out a mailing. The size of the mailing, I have no idea.

5 For $8,800, it had to be a pretty large mailing.

6 Q. Item 2 has "Lists." What was this about compiling

7 lists? Was this a direction to compile the list?

8 A. The 10,000: it looks like it. Anything that

9 concerns a list is what you see below at item 3.

10 Q. Are any of the lists here associated with

11 MediAmerica in any way?

12 A. Well, Geske and R. K. Stahlman were on our board

13 of directors.

14 Q. Shortleys?

15 A. No.

16 Q. Maiselle Shortley?

17 A. That's who that is.

18 Q. Was she associated with MediAmerica?

19 A. No. She was one of Rich's friends.

20 Not the Webers, Foxhoouz, Ken Carpenter, Dave

21 Holland, Dan Snider --

22 Q. Are any of them associated with MediAmerica?

9 7 0 4 0 4 5 0 6 1

A. No. No one here on the list was affiliated with MediAmerica except for Rich and myself.

BY MR. MIMS:

Q. Do you know if Maiselle Shortley had been vice president and a director of MediAmerica?

A. She was when MediAmerica was started and she resigned, I think, back in 1980 or 1981.

BY MR. LEVIN:

Q. So, she would have perhaps been around at the time of this meeting?

A. August 18, 1980. I really don't know.

Q. How did you propose to get the funds to start up this mailing?

A. The original funds from these people.

Q. Plus any additional ones on the list?

A. Right.

Q. When was that first mailing made?

A. I just don't even know. It had to be sometime after August and I would guess sometime in September.

Q. Do you remember the form of the first mailing? What form that was in?

A. It was, I believe, what we refer to as a facsimile

8 3 0 4 0 4 0 5 0 5 7

1 package

2 Q. Could that first mailing have been in October?

3 A. No. That was too late.

4 Let me take that back. It may have been in October.

5 I really don't know. I don't recall.

6 Q. How many pieces were sent out?

7 A. I don't know.

8 Q. Do you have an approximate figure? Thousands?

9 A. If I could look at what we had, the responses,

10 I could give you an idea, but I really don't know. I don't

11 know what the size of the mailing was.

12 BY MR. MIMS:

13 Q. If I were to show you a copy of the mailing, would

14 you recognize it and perhaps be able to fix it as the first one?

15 A. I don't know.

16 BY MR. LEVIN:

17 Q. This is to see if it refreshes your recollection.

18 It's not for admission as an exhibit.

19 A. Yes. I think that was the first mailing. That is

20 October 10.

21 MR. LEVIN: I'm going to have that marked FEC

22 Exhibit 2.

8 3 0 4 0 4 5 0 6 3

(The document referred to was marked for identification FEC Exhibit 2, a copy of which is attached to the original transcript of this deposition.)

MR. LEVIN: And, I'm showing FEC Exhibit 2 to Mr. Romanin.

BY MR. LEVIN:

Q. I realize that you have just discussed FEC Exhibit 2 but, for the record, I would like for you to identify FEC Exhibit 2, what you have just looked at.

A. I believe that was the first letter that was sent by the committee.

Q. An Urgentgram?

A. Right.

Q. Now, you had a mailing list to send these pieces out to?

A. Yes.

Q. Where did this list originate from?

A. I really don't know.

MediAmerica had a pretty signficant size computer facility. Without looking at any documentation from MediAmerica, I don't know where the list was compiled or how it was compiled.

3 3 0 4 0 4 5 0 6 4

1 BY MR. MIMS:

2 Q. Did MediAmerica own a list?

3 A. No. MediAmerica did not own any lists. Although

4 MediAmerica held many lists for many different clients, it did

5 not have a list of its own.

6 I was always opposed to our owning lists.

7 Q. Did it co-own lists?

8 A. Absolutely not. That was one of the things that

9 I was always opposed to, any list possession or list ownership.

10 Q. Would MediAmerica purchase a list from any client?

11 A. Actually, that may be how we got the first list. I

12 don't know. Rich was in charge of all the mailings and he was

13 the one that put that list together. In fact, he was the one

14 who wrote it.

15 Q. Would Mr. Geske be able to answer that?

16 A. He would be able to answer all those questions.

17 Q. Would you have purchased it from another house?

18 A. That's commonly done. I would assume that's how

19 this was done.

20 Q. Would you have any idea whether or not you or Mr.

21 Geske or anyone else at MediAmerica informed the vendor the

22 purpose of purchasing this list?

A. For many lists in the political area, the purpose is usually requested by the list broker, byt the person who owns the list or acts for the owner of the list.

Q. So, MediAmerica purchased the list and was asked why you wanted the list?

A. That's commonly done. It's not a blanket policy.

It's possible to get a list from whoever without providing the use for it, but in most cases, I would say, most people require to know what the list is being used for.

Q. How large a list was this that you purchased?

A. I don't know. I really don't.

Judging from the $8,800 figure, if that was used as the budget for mailing, I would say it was probably close to four to six thousand pieces.

Q. How many contributions were received from the first mailing?

A. I don't have any idea.

Q. Would it have been in the thousands, in the hundreds?

A. Probably in the thousands.

Q. What return rate would you imagine that would have been?

A. Not knowing the percentage or breakdown for returns if it broke one percent -- I don't know. I would have to look at the return figures to be able to tell you.

I don't know what the performance of the package was.

MR. LEVIN: I'll ask the reporter to mark this FEC Exhibit 3.

(The document referred to was marked for identification FEC Exhibit 3, a copy of which is attached to the original transcript of this deposition.)

BY MR. LEVIN:

Q. Can you identify FEC Exhibit 3 for the record?

A. It's an invoice for the National Republican Candidates' Committee.

Q. For a mailing in October; is that correct?

A. Right.

Q. Does any of this refresh your recollection as to any details of that mailing?

Obviously, the number of pieces mailed out is on there, but does it give you any sense of what the return was?

A. I can only go by the industry standard. I would say that the response was anywhere between one and two percent. I don't know what the average contribution was.

1 Q. But, you're talking two hundred perhaps?

2 A. Probably several thousand at least.

3 Q. But two hundred responses perhaps. That would be

4 one or two percent.

5 A. That's about right.

6 Q. What did you mean when you said "several thousand"?

7 A. I'm using the general industry standard. I would

8 say it should have brought in about four thousand, I guess.

9 Q. Who would have prepared the invoices in these

10 records, as to the mailing?

11 A. I did a lot. Rich did a lot. We did our own

12 invoicing, and I would think that Rich put this invoice

13 together. I'm not sure he did.

14 BY MR. MIMS:

15 Q. But, you are sure that you didn't; is that correct?

16 A. Yes. He was handling everything for the direct-

17 mail campaign.

18 Q. Would you normally handle the invoices for other

19 clients for this type of service?

20 A. I think that for specific clients or for someone

21 using our services, I would normally do the invoicing. In

22 other words, if I was either in charge of the management of a

1 client's work or if I had initiated the work, then I would
2 essentially take the job through its entirety and issue an
3 invoice. The same would apply to Rich.
4 BY MR. LEVIN:
5 Q. Did you receive any checks over $100?
6 A. I don't recall. I don't think so.
7 Q. In other words, of all these checks from the two
8 hundred contributors, not one was over $100?
9 A. I don't recall. I don't think so. I don't remember
10 seeing any large checks in the report.
11 Q. Over $100 would be a large check in your business
12 for something like that?
13 A. Well, the line would be $50 to $100 for what we
14 refer to as a high-dollar contributor.
15 Q. When you receive checks, would they be received
16 at MediAmerica headquarters?
17 A. Yes. They came to MediAmerica and it was batched
18 by the bookkeeper during those separate hours. In fact, that
19 was what Ms. King was complaining about a lot of the time
20 perhaps.
21 Q. Separating it?
22 A. It was a laborious process.

Q. A laborious process?

A. Yes.

(Discussion off the record)

Q. Let's go into this process. What would happen? The checks would come in, and what would happen next? Ms. King would get the checks and what would she do with them?

A. The normal procedure in that process is to open the envelope, record the contribution amount on the outside of the envelope, and paperclip any cash or check that was accompanying the reply. It was recorded in the books. I believe that Ms. King was handling that, the caging and batching.

Q. Were they then deposited in the committee account specifically?

A. I'm not sure the committee had an account. I don't even recall that it was deposited for the committee.

Q. Do you know if Ms. King would write anything on the checks endorsing them over to anybody?

A. I really don't know.

Q. You don't know whether she would endorse them over to MediAmerica to constitute payment for services?

A. I seriously doubt that would ever happen. I assume the checks were marked properly for the people to

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1 identify the amounts given by contributors so we could fill in
2 the FEC reports, and those amounts were deposited in the
3 committee account.
4 Q. Did MediAmerica perform this service for any other
5 of its clients?
6 A. The caging and batching?
7 Q. Right.
8 A. Yes. For the Conservatives Against Liberal
9 Legislation. It wasn't a service that we normally provided but,
10 if one of our clients asked us to, we would.
11 Q. Would there be an extra fee for that?
12 A. Sure. It's a separate service. Right.
13 Q. Did the committee pay for this particular service?
14 A. Sure.
15 Q. The National Republican Candidates' Committee?
16 A. Sure.
17 Q. Did anyone at MediAmerica perform this service
18 for any kind of committee?
19 A. The caging and batching?
20 Q. Yes.
21 A. Must have.
22 Q. Do you know how many other committees?

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A. How many organizations?

Q. Just other committees.

A. The caging and batching?

Q. The same process you went through with the National Republican Candidates' Committee in terms of the checks.

A. Yes.

Q. Would you do that for FEC data; in other words, prepare a list for FEC reports?

A. No. I don't think so.

I think that packages were prepared. The information was in a carrier envelope or a reply envelope. Wait a minute. The payroll reports probably were put together and the amounts were recorded. I don't know the specific name for it. I'm not familiar with that process.

But, amounts were recorded on a sheet and then tallied so that the numbers on those sheets would correspond and balance with the actual checks. In other words, there was a balancing procedure before the moneys were actually sent back to the client.

Q. So, this would be done for other clients?

A. Right.

Q. Now, you said before that MediAmerica did not have

its own lists?

A. Yes.

Q. Did they build a data base off the committee contributors; in other words, checks coming into the committee?

A. Gee. I don't recall, but I think so.

Again, that would be documented at MediAmerica.

Q. Is that a service that would have been charged the committee?

A. Absolutely.

Q. Was it charged to the committee?

A. Again, I don't know.

Q. What were the funds received for the first mailing used for?

A. I don't really know. All I know is that we did contribute moneys to candidates and whether or not any of the MediAmerica invoices were paid, I don't recall.

Q. Was there any discussion about whether or not there would be payment to MediAmerica from the proceeds?

A. I don't think so. I don't reall any.

Q. Was there any discussion as to whether other clients should be paid before MediAmerica from the proceeds that came in?

A. Do you mean any other vendors?

Q. Yes. Any other vendors.

A. That, again, I don't know.

We had the printing bills, I'm sure, for the committee. How they were resolved, I don't know.

Q. Did any candidates receive money resulting from the first mailing?

A. Yes. We contributed to several senatorial candidates and, I think, one or two congressional candidates.

I was upset because I felt that the contributions were too large. I felt that the committee shouldn't make such large contributions because of the impact and I wanted to assure its surviving and to keep the overhead going. That included the rent and the time of Shirley King, that type of thing.

I don't recall what the total amount was, but we were giving pretty significant contributions to the candidates. Of course, that was the primary objective of the candidates' committee but, in starting the committee, it was our desire to have the committee certainly last beyond that election period that it was created in.

I just felt that contributions were necessary but

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that they were a little large for the amount of money the committee raised.

BY MR. MIMS:

Q. Were the contributions all made at the same time or at different intervals?

A. I don't know. I simply don't know.

I do know we went over a list of candidates that we wanted to support. I think Steve Symms was included in that. I think Chuck Grassley was one. I'm not sure, but I think Nancy Katzenbaum. I'm not sure about that. And, Danny Crane.

BY MR. LEVIN:

Q. Were there any aspects of the mailings discussed at meetings, or any communications?

A. Yes. As I recall, I felt that the mailings were going very well. With that income, I felt that we should be doing a lot more mailing.

Frankly, I don't recall, but I think we did one other mailing besides the first one because it was late in the election year.

Q. How often did you communicate with respect to discussing that first mailing?

A. You know, I don't think we had a meeting per se. I

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1 think what happened was that Rich designed the mailing, had
2 it structured, and it was mailed. Any conversations that we
3 ever had were: John, what do you think of this? Or, John,
4 what do you think of that?
5 Q. Would these discussions happen at work?
6 A. Yes. Work or dinner or something like that.
7 Q. When it happened at work, was there a separate
8 area blocked off to discuss this?
9 A. There was, but I'm not certain we always went there.
10 But, we did if we did meet. Then, Rich was keeping track of
11 hours or minutes and they would be recorded.
12 At least, that's what I recall.
13 Q. You said there was another mailing. What list did
14 you use for that mailing?
15 A. Again, I don't know. It may have been the first
16 list that was mailed the first time.
17 Q. Do you know when that mailing was sent out?
18 A. I don't have any idea.
19 Q. Would it have been early December after the election;
20 does that seem likely?
21 A. It's possible. I think it was. I think it was
22 for debt retirement, which is pretty common. I'm not certain

of that.

Q. Do you have any idea about the cost of that mailing? Does $10,000 sound right?

A. I don't know. If you show me the invoices, I can tell you if it's true.

Q. I'll show you this invoice.

A. Yes. I recall this.

Q. What is the rate of return on that?

A. I don't know. The standard industry norms would say that it was probably $4,000 to $5,000 total.

Q. Do you recall your sense at the time of it exceeding industry norms or equaling industry norms?

A. I really don't know.

If I could read the copy I might get a better idea what type of package it was. Debt retirement is typically good for direct mail.

MR. LEVIN: I'm going to ask the reporter to mark this FEC Exhibit 4.

(The document referred to was marked for identification FEC Exhibit 4, a copy of which is attached to the original transcript of this deposition.)

MR. LEVIN: And, I'm showing FEC Exhibit 4 to

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1 Mr. Romanin.

2 BY MR. LEVIN:

3 Q. Can you identify that exhibit?

4 A. Yes. I remember this because it was incredibly

5 poor copy. It's too much copy. It's not an Urgentgram-type

6 of package.

7 Q. What do you mean by that?

8 A. Well, it's too comprehensive. There's too much

9 copy involved.

10 Q. Is that what was sent out in the second mailing?

11 A. Yes.

12 MR. LEVIN: Let's take a break now.

13 (Brief recess)

14 MR. LEVIN: Back on the record.

15 Could you read back the last two questions and the

16 responses, please?

17 (The reporter read as follows: "Question: What do

18 you mean by that? Answer: Well, it's too comprehensive.

19 There's too much copy involved. Question: Is that what

20 was sent out in the second mailing? Answer: Yes.")

21 BY MR. LEVIN:

22 Q. Mr. Romanin, the documents we showed you with

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with reference to the second mailing, did they refresh your recollection at all as to the circumstances of the mailings, the pieces sent out and the rate of return?

A. Well, according to the invoice, approximately 12,000 were sent out. The return: I don't have any idea other than it's another 4,000 beyond the 8,000, so I would guess the gross receipts would be between $5,000 and $5,500.

Q. Who prepared the invoice?

A. I'm sure that Rich did.

Q. You know that you didn't?

A. Yes.

Q. Who did the receiving of checks for that?

A. Pardon me? The caging and batching?

Q. Exactly.

A. I don't know. When the mail would come in, it would come into the reception area. As a matter of fact, I even opened some of the things and was looking at some of the responses. Our receptionist was opening, too. And, Rich looked at them, too.

After they were opened -- when you send out the mailings you are anxious about the responses -- it would be put there for the caging and batching people.

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1 Q. In terms of opening the mail, are you speaking with
2 reference to this committee or are you saying this in general?
3 A. No. As I mentioned earlier, we would keep things
4 separate. I wouldn't sign a piece of paper down the hall as
5 a part of the committee. But, it was documented; at least,
6 it was supposed to have been documented.
7 Q. Normally, would you open the mail, or was it when
8 you saw that stuff was coming in for the committee that you
9 would open it?
10 A. No. Many times, if I had time or if I was in the
11 area -- in the reception area -- I would see the incoming mail
12 and open a few responses. It was no big deal.
13 Q. Referring to Exhibit 4, FEC Exhibit 4, which was
14 the material sent out in the second mailing, it was the copy
15 sent out in the second mailing?
16 A. Yes.
17 Q. It's signed by you, or it has your name at the
18 bottom. It says: "I urged each candidate to spend a minimum
19 of $50,000 on last-minute TV and radio advertisements with my
20 promise to help them after the elections."
21 Did you do that?
22 A. No. Rich may have.

3 3 0 4 0 1 5 0 3 6

1 I should add one other thing that came to mind
2 while I was outside. In my responsibilities at MediAmerica
3 for the committee, I was usually an up-front type of guy and
4 that's basically what I was here. I certainly saw the copy
5 before it went out, and I read the copy before it went out.
6 I read the copy and I even had comments on it, as
7 to its credibility and whether or not we should be using it.
8 But, that's not uncommon. When we write copy, there are a lot
9 of things you have to consider.
10 It could have been that Rich talked to the campaign
11 people of those elections and, to be very honest, I wouldn't be
12 able to tell you whether he did or not. I would expect he
13 would have documented it.
14 My name appeared on these things and that's
15 unfortunate. I felt I was doing my part in getting the
16 committee going. If it required that I meet someone or talk
17 to someone, I would. I had talked, in fact, to several
18 committees on occasions either because of business or just
19 because I was talking to them politically.
20 Q. Prior to the mailing?
21 A. Sure. Prior. Any time.
22 Q. Would you talk about your committee at all? The

8 0 4 0 1 5 0 3 1

1 National Republican Candidates' Committee?

2 A. I never did. I never did PR work for the committee,

3 frankly. Rich handled all that.

4 Q. Did Rich talk to them about that?

5 A. I think he probably did.

6 Q. But, you don't know that he did?

7 A. I don't know. I wasn't with him on that all the

8 time.

9 Q. You said that you would have questions about the

10 credibility or the truth or veracity. Did you bring that up

11 to him about urging the candidates to spend $50,000 at the last

12 minute?

13 A. It's not an unusual campaign strategy to do

14 something like that. If Rich put it in the copy and he got

15 approval, then I'm sure it was okay.

16 I felt at the time, looking at the copy and what

17 we were doing and since we were a significant committee, that

18 urging someone to do that wasn't the best thing.

19 Obviously, a lot of things we did were not the

20 right things.

21 Q. Who would give him copy approval?

22 A. In any direct-mail campaign, it's not copy approval

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1 because we were the committee.

2 He should have gone to the people. I think there

3 were some people mentioned in this copy. If they were mentioned,

4 they should have been contacted before it was mailed.

5 Yes. Steve Symms. Paula Hawkins.

6 Q. Do you know if he spoke with Steve Symms and Paula

7 Hawkins?

8 A. I would talk with Steve Symms frequently. Not

9 Symms himself, but the people on his staff.

10 Paula Hawkins: I think Rich probably did. I don't

11 know anyone there.

12 Q. In your respective communications, did you mention

13 the committee?

14 A. I don't know. I don't recall.

15 Q. When you set up this second mailing and mailed out

16 the pieces, what did you intend to accomplish with the proceeds?

17 A. Number one, attend to the liabilities of the

18 committee; i.e., the invoices that had been accumulating to

19 keep it in existence.

20 Q. Would that be the first priority?

21 A. Because it was new, overhead was important to

22 maintain. That's where a lot of the proceeds have to go on

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1 direct mail.

2 As you can see, oftentimes the income wasn't enough

3 to cover the expenses; therefore, what the goal is is to compile

4 a list so you can end up with additional mailings so you can

5 catch up. After a while, you see a positive cash flow.

6 Of course, it was also a goal -- and I think an

7 ambitious goal -- to contribute to candidates during its first

8 year.

9 Q. Do you say that was an ambitious goal?

10 A. Absolutely.

11 Q. Do you think you should wait until the proceeds of

12 the third mailing?

13 A. No. I think beyond that.

14 Q. Even beyond that?

15 A. Yes.

16 What you are doing, if you are not covering your

17 expenses as a committee, you're not making it. That doesn't

18 mean a committee can't help in other ways. It doesn't

19 necessarily have to be with cash contributions, but with advice,

20 with contacts with other people, so on and so forth.

21 There are many kinds of contributions but the

22 survival of the committee has to be paramount, as with other

organizations.

MR. LEVIN: Off the record, please.

(Discussion off the record)

MR. LEVIN: Back on the record.

I'm asking the reporter to mark this FEC Exhibit 5.

(The document referred to was marked for identification FEC Exhibit 5, a copy of which is attached to the original transcript of this deposition.)

MR. LEVIN: And, the reporter is now showing FEC Exhibit 5 to Mr. Romanin.

BY MR. LEVIN:

Q. Mr. Romanin, can you identify this document?

A. Yes. I remember seeing this. Yes.

Q. Did this request for clarification come in the form of a phone call or a letter to Congressman Symms?

A. As I mentioned earlier, where you are making reference to someone else, it should be a matter of policy or a standard procedure to contact those people. Obviously, it wasn't done here.

How this particular response was solicited, I don't know.

Q. Do you know when it was?

3 3 0 4 0 1 5 0 3 1

A. (Nods) I remember seeing this letter though and its coming in. Rich showed it to me.

Q. So, Mr. Geske would have had the phone call or conversation?

A. I'm sure.

Q. Do you know when that took place?

A. I don't have any idea.

Q. You said before that you had discussions with Mr. Geske about the size of the contributions. What was that about?

A. About the size?

Q. Something about how you questioned the size of the contributions ultimately made by the committee.

A. I don't know what the total amount was in contributions to the candidates, but I felt that it was quite a bit, given the debts that we had to MediAmerica and other vendors. That's about it.

BY MR. MIMS:

Q. Just on that point, you said debts to other vendors?

A. We should have had printing debts at the very least, and list rental debts.

Q. I have another exhibit here.

The reports which were filed during the calendar

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year 1980, signed by Shirley King during the time she was treasurer, reflect debts to MediAmerica as the only vendor.

Are there any circumstances under which MediAmerica might have subcontracted to another vendor?

A. Yes. If there aren't any invoices from other vendors in your records, I would say that probably in the MediAmerica files you would find invoices that involved the printing and list procurement rental. Those are the only other two items in getting a package out.

It's not an unusual practice either that invoices we would get we would send out from being billed directly by the vendor or we would bill the client for those services.

Q. Is that a common practice for MediAmerica?

A. Yes.

Q. If the committee did not pay MediAmerica what it owed on the invoice and if the invoice included amounts owed to the subcontractor, did MediAmerica pay the bill to the subcontractor?

A. Again, I wouldn't have any idea. I assume they would have.

Q. That would be the common practice for MediAmerica in the event that the client did not pay?

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A. I'd have to say for all the clients without any question, if we were asked to do the bidding for printing or do the bidding for any other service on behalf of the client, we would do that and that vendor would bill us directly.

We, in turn, would invoice the client and normally it involved attaching a ten percent handling charge on top of the invoice, a ten percent handling fee for going through the bidding process and securing the additional services of a subcontractor for a particular job.

That's the normal way we do it.

Q. Would you tack it on the invoice or would it be specifically itemized?

A. I don't know. Many times it would depend on how the client would want the invoicing done.

If there wasn't a specific request on the invoicing, what would normally happen, we would delineate in the invoice specific items -- printing, list rental, any other subcontractor -- and we would specify who the vendor was and the charge. Normally, the charge on the invoice would include the handling fee.

Q. When you made arrangements with the other vendors, did you tell them for what purpose these arrangements were being

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made?

A. No. I would have to say that during the course of a day we might talk to 25 different vendors, and they have no reason and we have no reason to say who the work's for.

Q. So, as far as the vendors are concerned, they are just dealing with MediAmerica?

A. Exactly.

Q. How would that time be kept track of? Would that be considered MediAmerica time or committee time?

A. It would probably be kept track of under MediAmerica time.

Q. As part of its service to the committee?

A. I would think so.

Q. So, when you -- I'm sorry. Go ahead.

A. One thing on the invoices: normally, particularly for printing and list rental, I guess I take that back. The vendor can identify the work. They can identify it in the description. Normally, it would say something like: 10,000 envelopes with a description of the printing process, and for the National Candidates Committee; that would be on there.

Q. So, when you and Mr. Geske talked to these vendors, did you mention that this was a committee that you and Mr.

1 Geske were a part of, or did you say it was a client?

2 A. No. No way. Usually, we knew the vendor and would

3 ask for a bid and the work would be sent. Then, there would

4 be a description for them to see on the job for our accounting.

5 BY MR. LEVIN:

6 Q. When did anyone, you or Mr. Geske or anyone else

7 at MediAmerica, first become aware of a complaint from the

8 U. S. Postal Service?

9 A. For the Urgentgrams?

10 Q. Yes.

11 A. I don't know how we became aware of it. It may have

12 been through Sedam & Herge. I don't remember.

13 Q. Who filed the complaint originally?

14 A. I don't have any idea. It may have been originally

15 by RNC or NRCC. Probably NRCC because they had a problem with

16 our name.

17 Q. You mean the National Republican Congressional

18 Committee?

19 A. Right.

20 MR. LEVIN: I'm going to have the reporter mark

21 this FEC Exhibit 6.

22 (The document referred to was marked for identification FEC Exhibit 6, a copy of which is attached to the original transcript of this deposition.)

6 3 0 4 0 4 5 0 9 0

MR. LEVIN: The reporter has shown FEC Exhibit 6 to Mr. Romanin.

While we are at it, I'll have the reporter mark this FEC Exhibit 7.

(The document referred to was marked for identification FEC Exhibit 7, a copy of which is attached to the original transcript of this deposition.)

MR. LEVIN: And, the reporter has shown FEC Exhibit 7 to Mr. Romanin. He has both exhibits in front of him right now.

THE WITNESS: Yes.

BY MR. LEVIN:

Q. Can you identify FEC Exhibits 6 and 7?

First, in what respect have you seen them before?

A. I have never seen these. I was informed it was a violation by Rich and I was pretty concerned about it at the time. I never saw these letters though.

Q. Neither 6 nor 7?

A. No.

Q. Do they refresh your recollection as to when someone at MediAmerica, you or Mr. Geske, became aware of the complaint?

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A. These are dated by our people.

All I can say is that, if we had been informed by the U. S. Postal Service and I had been informed by Rich that we were in violation of that code with the U. S. Postal Service, then I'm confident that I said we better change the format.

Again, I don't remember seeing these letters at all. I'm positive I never saw them.

Q. The format?

A. Of the Urgentgram.

Urgentgrams are commonly used now to replicate the Western Union telegrams. Direct mailers use them all the time.

I even put together the art work, or the sketching, for our Urgentgram, including a facsimile of the seal, upon Rich's request. I gave it to him; he gave the authorization; we sent it to the typesetters; it was done.

It was a mistake. I did what he wanted to do which was to get the Urgentgram as appealable as possible.

Q. That was a decision made by Mr. Geske?

A. Absolutely.

Q. Was there a concern about this complaint and the actual format of the contents of that Urgentgram?

A. On my part?

Q. On Mr. Geske's part.

A. Yes. I can't see how it was possible after this letter that another mailing went out using the Urgentgram.

Q. How about the wording of the message in those Urgentgrams?

A. I can tell you that I probably saw the copy, but I didn't have veto over the copy. I probably wasn't too interested in seeing that copy go out.

Q. When this complaint came in, Mr. Geske started having second thoughts about it?

A. When we got the original complaint, you know, I was upset. We had close to a million forms in stock or more that we had ordered. It was a pretty big expense, because we thought we were okay.

Now, I don't recall, but it may be possible that there was clearance from Sedam & Herge on the dang format.

But, to get back to this, I don't see how this second mailing went out under it, if we had orginally even been advised it was a violation of that trademark.

Q. Was Mr. Geske or were you concerned about somehow being in some trouble with the Republicans? Maybe with the complaint filed by the Republicans?

A. I didn't know it was by the Republicans. I was assuming ---

Q. You were assuming?

A. Because the name of the committee was so close: NRCC, the National Republican Congressional Committee.

I came up with the name at Rich's request. He wanted something that looked like NRCC but was a separate committee and had different goals in mind. So, I came up with the National Republican Candidates' Committee. It's crazy but he wanted to go with it. I thought it was stupid. I didn't want to go with the dang thing in the first place.

Q. When the -- I'm sorry. Go ahead.

A. No. It's incredible.

Q. So, when the complaint came in, I imagine you and Mr. Geske talked about this?

A. This?

Q. That letter.

A. Yes. I was told that we were using the mail fraudulently, that we were in trouble with the postal service with the trademark, and I just about lost control.

At that point, we had to take 800,000 forms and I had them put back in inventory and marked "not to be used."

I was told after the first violation and I can't see how it was possible it was sent out again.

Now, I was responsible in a management sense. Although I was not in the services area, the computer or publishing room, I was responsible for that area.

We had hundreds of thousands of pieces going out during the election year. If a particular job was going out, and particularly something for the candidates' committee, and Rich and I discussed it, and if Rich wanted to go with the thing, he had final authorization and it went. There should be documentation on that.

But, I would have to look at a time-line and look at the documents at MediAmerica to know whether or not there was cognizance in sending out a mailing after a complaint like that from the postal service. I find it absolutely impossible.

Q. So, when you were having all these discussions concerning this kind of thing, did you discuss the Republicans at all?

A. Is this public information?

MR. LEVIN: Let's go off the record.

(Discussion off the record)

MR. LEVIN: Back on the record.

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(The reporter read the pending question.)

THE WITNESS: The Republicans being whom?

BY MR. LEVIN:

Q. The possible complaint of the fact that perhaps here was a committee trying to help Republicans and yet you were now in difficulty with them.

A. I wasn't. At the time, I wasn't aware of where the complaint was coming from. Rich had informed me because he had talked to other people. I don't know who he talked to, but the committee was upset that another committee was being formed.

My simple response was that they don't have the corner on Republican politics in the country. I didn't have any problem with the fact that they had a problem with us. I was prepared to defend that position.

Q. But, Mr. Geske appeared to have a problem in the sense that he was concerned about it?

A. Concerned in what way?

Q. Concerned about any possible action that the Republicans might pursue against him or concerned about MediAmerica's relations with the National Republican Candidates' Committee and the Republicans.

You seem to have had conversations that you didn't

1 have a problem going ahead because the committee didn't have
2 a corner on Republican politics. And, he seemed to express a
3 different view; is that correct?
4 A. No. I don't think so. I don't think he had a
5 different view from that. We wouldn't have formed the
6 committee in the first place.
7 Q. He nevertheless was concerned about that?
8 A. Yes. As was I. I was concerned about that, but
9 I was prepared to stand up for what I felt was right.
10 MR. LEVIN: I'll ask the reporter to mark this
11 FEC Exhibit 8.
12 (The document referred to was
13 marked for identification
14 FEC Exhibit 8, a copy of which
attached to the original
transcript of this deposition.)
15 MR. LEVIN: We have now shown FEC Exhibit 8 to
16 Mr. Romanin.
17 BY MR. LEVIN:
18 Q. Can you identify FEC Exhibit 8?
19 A. Well, number one, all the writing on here is mine.
20 Q. Anything else?
21 A. I'm trying to think why this list was put together.
22 I think that I was given this list to talk with the

8 3 0 4 0 4 0 5 0 9 7

1 people. I was talking with the committees about doing work for
2 them for debt retirement. That was under MediAmerica; that
3 wasn't under the committee.
4 Q. When would you have had contact with these
5 committees, or when did you?
6 A. Probably very soon after the elections.
7 Q. What would MediAmerica do in terms of debt
8 retirement for those committees? What would their function be?
9 A. As far as support, it would have been in the form
10 of contributions or some other effort. I don't know what.
11 BY MR. MIMS:
12 Q. Do you mean contributions by MediAmerica or by the
13 committee?
14 A. Not by MediAmerica, by the committee.
15 BY MR. LEVIN:
16 Q. So, you are talking about this would have been
17 contributions by the National Republican Candidates' Committee?
18 A. I'm sorry, John; what was that?
19 Q. These were possible recipients of the National
20 Republican Candidates' Committee?
21 A. No. Judging by the notes on here, this was some-
22 thing I did at MediAmerica, soliciting business. That's what

that is.

Q. So, they had a direct-mail service for the committee to retire the debts?

A. Whatever it may have been, I think specifically I was going out and talking to people at PAC receptions for them in Washington here.

Q. That would be set up by MediAmerica?

A. Exactly.

Can I ask something off the record?

MR. LEVIN: Off the record.

(Discussion off the record)

MR. LEVIN: Back on the record.

Let's have the question and answer read back.

(The reporter read as follows: "Question: So, they had a direct-mail service for the committee to retire the debts? Answer: Whatever it may have been, I think specifically I was going out and talking to people at PAC receptions for them in Washington here. Question: That would be set up by MediAmerica? Answer: Exactly.")

BY MR. LEVIN:

Q. So, the effort here in FEC Exhibit 8, again, did MediAmerica actually set it up?

A. No. This was an effort I made. I used a lot of PAC receptions and I wanted to try to do some again, but my personal time was very, very limited and I gave up on the effort.

Q. You had done the work trying to drum up business. That was one of your functions?

A. Right. Right.

MR. LEVIN: I will ask the reporter to mark this FEC Exhibit 9.

(The document referred to was marked for identification FEC Exhibit 9, a copy of which is attached to the original transcript of this deposition.)

MR. LEVIN: We have shown FEC Exhibit 9 to Mr. Romanin.

THE WITNESS: Yes.

BY MR. LEVIN:

Q. Can you identify FEC Exhibit 9?

A. It's an FEC report.

Q. What's on these reports?

A. Records of contributions made by the National Republican Candidates' Committee to the candidates.

Q. Would this refresh your recollection as to the amounts of the contributions and the number of contributions?

A. It does. Yes.

I didn't recall that we made contributions of these types. I thought we made larger contributions than these.

Q. Are these larger than the ones you thought should have been made?

A. Yes. The total, $5,000, is a lot of money when you consider the amount of money that was brought in.

Q. You said before that perhaps there shouldn't have been any contributions sent out before more mailings.

A. We could have provided sorely needed support to the candidates by contributing some amount, not necessarily $500 a piece.

It was a new commitee. It shouldn't have been making contributions in amounts of that type.

Q. Why did Mr. Geske decide to make those contributions of that size over your objections?

A. Certainly, one of the reasons the committee was created was to support candidates with contributions and other support devices. I suppose by doing this, by making these types of contributions, we would early on show that we were a real, viable committee and that we were doing a lot more in terms of cash contributions than anyone would expect us to do. Therefore,

1 we'd be gaining a better reputation, if you will.

2 Q. Did you think there was any question about that at

3 this point?

4 A. What do you mean? The viability of the committee?

5 Q. Right.

6 A. There's a question of viability with any new

7 political organization.

8 We made the contributions and they were sizable for

9 a small committee. I suppose what we were trying to do, and

10 what Rich was trying to do, was publicly demonstrate that we

11 were new but we were participating and, therefore, committees,

12 why not let us participate?

13 Q. Did you get a sense from these other Republican

14 organizations that maybe they had some doubt about the viability

15 of the committee, or maybe you were concerned that the

16 Republican committees had doubts about the viability of the

17 committee?

18 A. No. They had doubts about whether or not -- my

19 feeling, again, was -- and I will reflect back -- the primary

20 impetus on my part, and I feel on Rich's part, was that we

21 wanted to participate in the political process and there was

22 no reason why there shouldn't be another organization to help

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1 Republican conservatives get elected to office.

2 We felt that by having another committee such as

3 this we could do that. Now, the major committees, primarily

4 I think because of the original name, had a problem,

5 specifically with the National Republican Congressional

6 Committee. I sympathized with that. I would have had a

7 problem if I had been a member of NRCC.

8 Q. Did Mr. Geske feel perhaps that this was one of

9 the ways perhaps of showing the Republican committees: Look; we

10 are for real; we are giving to these newly elected congressmen

11 and senators $500 each, these ten recipients? It was kind of

12 a way to show it publicly?

13 A. It was a re-enforcement for us.

14 I wanted to make contributions and I wanted to see

15 early results but, again, they didn't have to be of this

16 magnitude. It wasn't necessary.

17 Q. If Mr. Geske hadn't perceived this concern, this

18 need to show that they were for-real at this time, would he

19 have wanted to make that size of a contribution?

20 A. I'm just trying to recall some of the conversations.

21 Q. If you could tell us that, that would be fine, too.

22 That would be good.

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A. I can't recall any specific conversations about why we gave these amounts or what was the real reason. It was not that we were trying to really prove anything to anyone, not anyone specifically. It was just important to participate.

I can't really elaborate on anything other than that reasoning.

Q. Well, did you feel that the postal complaint had kind of questioned your legitimacy?

A. No. I think it just clearly demonstrated a pretty poor piece of judgment by using a logo and a facsimile that was so close.

Q. What I mean is that others might have questioned your validity because of the complaint and you wanted to say: wait a minute; we have a legitimate organization; somehow we have got to prove that?

A. I see what you are driving at.

After some of the problems that we had that we had to make some contributions.

I don't think so. I don't think that was the case. It might have been. Certainly, if you have people calling you a bunch of frauds in the mail and in a number of other things, you want to show that you're really legitimate. This very well

could have been a reaction to that and a reasonable and honest one.

In recalling it, I know that I certainly had some concerns about the complaint. I was really upset about the postal complaint and how, with the complaint against the committee and being in the position I was, I would have to defend the committee.

I would have to say, looking in retrospect, with these contributions there was probably some effort to legitimatize the committee, but I think it was done for very, very legitimate reasons; very, very sincere reasons.

Q. In other words: it was an honest effort; quit picking on us; we are a committee?

A. I think so. And, I believe that was the way that Rich was reacting to it. I think maybe we over-reacted on the contributions, but Rich had the say-so on that.

Q. Who made the decision to contribute to these specific candidates?

A. Again, Rich gave me a list of candidates.

Well, I can't remember. I put some candidates on the list and gave them to him and he came back and said what do you think and I probably checked them off.

1 Q. Are these the ones you perceived as having the most
2 need for money?
3 The reason I ask that is that they are all newly
4 elected to the different bodies.
5 A. Either that or they were opposition candidates.
6 As I recall, I think we had received information,
7 or Rich had received information, that these particular
8 committees were in pretty poor financial shape and that they
9 had large deficits. So, that may have been why we gave the
10 contributions we gave.
11 Rich felt that it was important to give that type
12 of contribution so that it would be recognized. $500 is a
13 pretty good size.
14 Q. Recognized?
15 A. Yes. By the candidate.
16 Q. I want you just to try to answer this question.
17 You have the setup with MediAmerica and, of course,
18 you have the committee operating within the perimeters of the
19 office; right? In other words, you took a geographic working
20 area within the office?
21 A. Yes.
22 Q. Could you describe that in terms of the facilities?

3 3 0 4 0 4 5 1 0 6

1 Was there a separation of facilities? And, how many
2 people would move? Who would be involved?
3 A. I can remember Rich coming to me with a specific
4 area diagrammed for NRCC.
5 Q. A kind of blueprint?
6 A. A floor plan. Exactly.
7 It showed the conference room was the designated
8 area for NRCC.
9 Q. Was the conference room used for anything but NRCC?
10 A. Yes. It was used for a lot of other things.
11 Q. Would you keep records of the time it was used for
12 the committee?
13 A. Rich should have the documentation on that.
14 Q. How about phones or storage facilities?
15 A. As a matter of fact, we had a separate line put in
16 for NRCC; that's right. The damn thing was always ringing.
17 Q. Who else worked on committee matters that worked
18 for MediAmerica on a service basis with the committee besides
19 Mr. Geske, Ms. King, Karen Dent, and yourself. Was there
20 anybody else?
21 A. Maybe a receptionist, when the mail came in. That's
22 the only other person I can think of.

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1 Q. How were these people paid? Only by MediAmerica?
2 A. I don't know.
3 I think it's probably the case that the candidates'
4 committee wrote checks for the time spent, at least for the
5 support personnel. Rich and I never received any moneys for
6 our efforts.
7 Q. How much time would you and Rich put in at work
8 on the committee itself?
9 A. Very, very little. Very little time. Negligible.
10 Q. I just want to go back a second.
11 A. I think the only thing I ever did was sign FEC
12 reports.
13 Q. I just want to go back a second to those
14 contributions.
15 When did you decide you were, or Mr. Geske decide
16 you were, going to send out the contributions?
17 A. Probably about the time we were receiving phone
18 calls from the Republican committees and things started getting
19 pretty bad. I would say that.
20 Q. At the point you were setting up the contributions?
21 A. We had contributed. Of course, when those things
22 started happening, we were concerned. I was concerned that it

1 got put together quickly.

2 MR. LEVIN: Off the record, please.

3 (Discussion off the record)

4 MR. LEVIN: Back on the record.

5 I'm going to ask the reporter to mark this

6 FEC Exhibit 10.

7 (The document referred to was
8 marked for identification
FEC Exhibit 10, a copy of which
9 is attched to the original
transcript of this deposition.)

10 MR. LEVIN: We have shown FEC Exhibit 10 to the

11 witness.

12 BY MR. LEVIN:

13 Q. Can you identify FEC Exhibit 10?

14 A. Yes. It's a quarterly federal tax return.

15 Q. Do you see on the right-hand side the designation

16 "TCC"?

17 A. Right.

18 Q. Do you know what TCC is?

19 A. Why do you ask?

20 Tax returns are pretty confidential material. Why

21 do you ask? I don't mind answering, but ---

22 Q. We were told that this might be another client of

3 3 0 4 0 4 5 1 0 5

1 MediAmerica. This was submitted to us yesterday and I was
2 trying to establish the relationship with TCC.
3 A. When was this given to you? Yesterday?
4 Q. Yes.
5 A. Really?
6 Q. Not by IRS.
7 A. Gosh. No wonder they're not paying their bills.
8 TCC: we had a client some time ago -- that may not
9 be correct, TCC -- but it may be the Conservative Caucus,
10 commonly referred to as TCC.
11 But, to my knowledge, it is no longer a client and
12 they left some time ago.
13 Q. Why would they be listed on a form filled out by
14 MediAmerica? Why were they a separate entity with the
15 calculations there?
16 A. I haven't the faintest idea.
17 Q. At one point, was there a MediAmerica and a
18 MediAmerica/TCC account? They would keep their moneys in a
19 separate account?
20 A. Are you saying that you are thinking that TCC is
21 the candidates' committee?
22 Q. I'm assuming it's the Conservative Caucus.

A. Again, as I told you earlier, I did not have access to the books but, if I had looked at them, I wouldn't have been able to tell a deficit from a surplus. Okay.

As far as keeping separate accounts, we had postage accounts at MediAmerica, special accounts for clients to be put on postage or for taking out postmaster checks on behalf of the client.

I believe we had a separate account for some of our phone-bank clients, one of those being TCC or the Conservative Caucus; again, we referred to them as TCC.

I don't think we are talking about the candidates' committee.

Q. Let's assume this is the Conservative Caucus.

A. Fine. We would have a separate account for postage and then, perhaps, a separate account for the payment of the bonuses to the phone-bank workers.

Q. Would you have a separate bank account or a separate book entry to keep that a separate account?

A. Again, I don't know. It could have been either.

Q. Do you know when TCC was a client of MediAmerca?

A. Gee. Probably around November of 1978 to November of 1979.

Q. Was that a large client?

A. Pretty good size.

Q. Do you recall according any special treatment to them, other than a bank account which you don't know the existence of, but was it a special relationship?

A. That's why the accounts existed. They were for specific things that had to be kept track of for a client's money to be taken in and out.

Q. Do you know of anything else that was special about that committee?

A. The Conservative Caucus?

Q. Would the committee have a separate banking account?

A. That's very possible, yes.

(Discussion off the record)

Q. Usually, did you have written contracts with your clients?

A. Yes.

Q. You did have?

A. Yes.

Q. So, there would have been written terms and those clients would have been obligated, or the client's committee or entities, would have been obligated by contract to pay within

1 a certain period of time?

2 A. Yes. That's very, very possible.

3 Q. This went on there at least through the time you

4 were there at MediAmerica?

5 A. Yes.

6 Q. Were these contracts often adhered to by the various

7 clients? Did you have problems with getting payment?

8 A. No. I think we are talking about the phone-bank

9 clients for the most part. Specifically, with the clients that

10 we have written contracts with, we normally receive prompt

11 payment.

12 BY MR. MIMS:

13 Q. Would it be unusual, in light of the fact that

14 there were written contracts, to enter into oral agreements of

15 any size with a client which wouldn't be represented by a

16 subsequent written memorandum?

17 A. I don't think so.

18 No. We wouldn't make that type of commitment.

19 Q. You would not?

20 A. No.

21 Q. So, in dealings between MediAmerica and NRCC, would

22 there have been written memoranda supporting the work which

1 would have been done for the committee by MediAmerica other
2 then the invoices received by NRCC?
3 A. No.
4 BY MR. LEVIN:
5 Q. Was there a contract written out prior?
6 A. I don't think so. No. I don't think there was.
7 Q. Why in this case, if you usually did have a written
8 contract, why in this case did you not?
9 A. I had said there were written contracts but I said
10 they were for some certain number of clients.
11 Q. Phone-bank clients?
12 A. The phone bank specifically was normally in a
13 contract.
14 Q. No phone-bank work was done without a contract?
15 A. No.
16 Q. Why the distinction?
17 A. You mean as far as --
18 Q. Phone bank versus direct mail.
19 A. I don't know. We just never did. We never had
20 written contracts with any of the clients we had for direct mail.
21 Q. Would you usually get a better return on direct
22 mail than on the phone bank?

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A. No. Actually, they are a totally different type of service and you realize a different type of revenue from both.

Q. Did you ever have a discussion with Mr. Geske, or hear of a discussion, as to the need to collect more promptly from the committee, from the National Republican Candidates' Committee, for payment of bills?

A. No. And, if that had been done, that would have been Rich's concern, not mine.

Q. To be out-front, there seems to be a lot of payments that were not made. Did you think that was unusual? Did that concern you?

A. Not in the political area.

We have carried many, many organizations. "Carried" meaning that the invoices have been stretched out for an extended period of time but, mainly because of the FEC laws, they are required to pay.

Q. Even those without written contracts?

A. Sure. And, particularly the candidates' committees.

Q. But, those contracts were paid?

A. It's not voluntary that they have a difficult time paying.

Q. In other words, the contract would be set out with

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1 a specific date for payment with your realization that if the
2 people simply couldn't pay ultimately that you would carry them?
3 A. They stayed on our books and, when they were able
4 to pay, they would pay. Normally, we charged interest.
5 Now, I would have to say that with the phone bank,
6 they had a written contract, and that was primarily because we
7 did have to put a lot of money up front to establish the phones
8 and all the things that are needed to conduct that for a client.
9 Q. But, for direct mail you didn't have a contract?
10 A. No. We worked on merit along.
11 BY MR. MIMS:
12 Q. And that's the way it worked for the committee
13 conceivably?
14 A. We were not good with the committee, but we are good
15 at our business.
16 Q. So, conceivably when a committee wasn't able to pay
17 and expressed that to you, then you would be willing to tack
18 on interest?
19 A. If you've ever been involved in business, that's
20 often the case. You have invoices that are outstanding and you
21 try to collect on them.
22 Q. When the National Republican Candidates' Committee

9 3 0 4 0 4 0 5 1 1 6

had receipts from its efforts to raise funds, who made the decision that it was going to go in the form of contributions to the candidates as opposed to paying back what the committee owed MediAmerica?

A. You lost me.

Q. When the mailing, the two mailings, were conducted on behalf of the National Republican Candidates' Committee by MediAmerica and the funds came in resulting from those mailings, if it was less than a hundred percent of the debts due to MediAmerica by NRCC, were those paid rather than contributing directly to the candidates, and who made that decision?

A. Oh. That would have been Rich.

MR. MIMS: Okay.

BY MR. LEVIN:

Q. How did you decide which clients to do services for? Did you pick out any clients that approached you? Were you discriminating?

I mean "discriminating" in the neutral way, as far as which clients you would do services for.

A. Normally, if it involved political clients, we wouldn't accept work for what we considered a liberal client. That was the only discrimination we ever made. You know: I

1 wouldn't work for FEC.

2 Q. First amendment.

3 Would you decide on the basis of the likelihood of

4 the success of the client?

5 A. The candidates' committee?

6 Q. A candidate's committee or a multi-candidate

7 committee or a political committee.

8 A. We would make a determination of whether we would

9 do the business.

10 Q. Would you be concerned -- like, why should we spend

11 all this money if no one is going to give to the committee?

12 A. There are all kinds of risks.

13 Q. But do you make this distinction? Is that part of

14 your business?

15 A. Sure.

16 Q. Put yourself in the position back where the

17 committee was forming and it was ultimately decided by you, and

18 Mr. Geske before you, to have MediAmerica provide services for

19 the committee.

20 How did you feel about the committee's prospects

21 for success compared, let's say, to a situation when MediAmerica

22 takes on any other political client?

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A. I don't think that was considered. I don't think we really thought about whether it would succeed or fail.

I take that back. I think we assumed it would succeed.

Q. You do take that kind of thing into consideration?

A. Sure.

Q. What made you assume it would succeed?

A. Because we were involved. You know, I have confidence in myself.

Q. As a worker for MediAmerica or as an organizer of political committees?

A. Yes.

I should backtrack a little bit. It was always our goal not to be involved with the committee. I shouldn't say that either. We were and we would have been on the personal level. I always anticipated that we would have relinquished the day-to-day running of it to a director or some head of staff and support staff. That would have been a self-sufficient committee, not only monetarily but in a management sense and in employee considerations.

Q. But, that never transpired?

A. No. This is over a three-, four-, five-, six-month

period and it just didn't happen.

Q. So, Mr. Geske and/or you actually did function as a kind of political director? You were making decisions and Mr. Geske was making decisions?

A. You might say that.

Q. On what basis would you decide to have the bills paid? Let's say you had a bunch of clients all with outstanding bills. On what basis would you say we are going to get payment or oppose getting payment from another committee?

A. That was normally just a matter of looking at the accounting reports. If we felt that someone was going beyond a reasonable period of time as far as their obligations were concerned to MediAmerica, then we would ask them or send some type of statement or communication reminding them that they owed us some money.

Other than that, we didn't do much of anything.

Q. Let's backtrack. You have people like Shirley King working for the committee, either on a contractural basis or for the committee separately. I guess you would account for that?

A. There should be records of that.

Q. How much day-to-day decision-making authority over

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1 the committee was exercised by you or Mr. Geske? Can you give
2 a percentage?
3 Did you closely supervise it or was it laissez faire:
4 we have set it up and every once in a while have to decide about
5 mailings, but otherwise pretty much left it alone?
6 A. No. The goal was to have someone come in and
7 serve that committee. We just didn't want to be involved in it,
8 as far as the management and day-to-day activity. We couldn't
9 do that.
10 Q. But, as a necessity it had to happen until the
11 other person came in?
12 A. Yes. And, we did that in our free time.
13 Q. After these contributions in December of 1980, did
14 the committee make contributions to any other candidates? The
15 National Republican Candidates' Committee?
16 A. I'm sorry. I was thinking about something else.
17 Q. After the December 29th contributions, whose $500
18 contributions --
19 A. Yes.
20 Q. -- did the National Republican Candidates' Committee
21 make contributions to any other candidates?
22 A. No. To my knowledge.

3 3 0 4 0 5 1 2 1

Q. Why not?

A. Because there probably wasn't any money, number one.

Q. Did you send out any other mailings?

A. Not that I know of.

Q. Why not?

A. I think probably because of all the problems it had created.

Q. You did change your name subsequently?

A. Yes. The NRCC requested that we change the name and I thought that it was appropriate to do so.

Q. But, you still decided -- with a new name we aren't causing trouble to anybody -- you still decided that you wouldn't pursue committee activity?

A. No. It's not that at all.

One: personally, I had not been spending any time with the committee or any significant amount of time. I was too caught up in what I was doing at MediAmerica. I was involved sixteen hours a day, at least.

Q. So, you left that to Rich Geske?

A. This was all Rich Geske. I remember at one point he came to me and said I really don't want you doing anything more on the candidates' committee.

Q. Except lend your name?

A. Unfortunately, I consented to that from the beginning.

MR. LEVIN: I'm asking the reporter to mark this FEC Exhibit 11.

(The document referred to was marked for identification FEC Exhibit 11, a copy of which is attached to the original transcript of this deposition.)

MR. LEVIN: We have shown FEC Exhibit 11 to Mr. Romanin.

BY MR. LEVIN:

Q. Mr. Romanin, can you identify FEC Exhibit 11?

A. It's a balance sheet for MediAmerica.

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6 Q. Do you recall when Shirley King left MediAmerica?
7 A. I think it may have been just before or just after
8 I left.
9 Q. Do you recall the circumstances?
10 A. Overworked; underpaid.
11 Q. Was that a source of acrimony between Shirley and
12 Rich Geske?
13 A. Yes.
14 Q. Were you involved in that at all?
15 A. No.
16 Q. Was there any mention of the committee? Of the
17 fact that she had signed things that she never even got to read?
18 A. I don't know that. I don't know.
19 Q. Did you hear anything about that?
20 A. I know there were a number of problems in that
21 area and, if you're asking me to be specific, I just can't.
22 I'm unable to be specific because I don't know.

It's not that I don't recall. I just never was really involved in anything on that. All I know is Shirley King complained a lot about that.

Q. What was her objection?

A. I think it was a matter of handling the candidates' committee and the MediAmerica business at hand. It was too much for her and perhaps deemed it too much for any one person.

But, again, I don't think there was that much to do for the candidates' committee. There wasn't that much activity.

Q. Would you say that she was in some way -- that Mr. Geske said, look, you have got to work for the committee -- was there any compulsion?

A. Rich can be that way. He can be very, very demanding.

Q. Was anybody else subjected to that kind of pressure to work for the committee?

A. I will say that from the beginning I wasn't too interested in being involved in it myself because I didn't think we did the proper things to get it going. It was rather quick. But, for the sake of rapport and for the sake of proper relations, I felt it was necessary to support it. And, I think

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1 that Shirley King felt the same way.

2 Q. Did others feel that way?

3 A. Others probably weren't as astute to think otherwise.

4 They just did their work.

5 Q. So, no one else was involved with the committee to

6 the extent that you and Shirley King would have been involved?

7 Not even to that extent?

8 A. No. I don't think so.

9 BY MR. MIMS:

10 Q. One final question and I'll draw on your

11 for a point.

12 That is, you indicated earlier that you thought

13 NRCC, in its relationship with MediAmerica, was not the type

14 of relationship where you would normally find established a

15 separate, segregated fund.

16 Maybe you can give me an idea of what a separate,

17 segregated fund is as opposed to the relationship that

18 MediAmerica had with NRCC.

19 A. Well, I see the definition of a separate, segregated

20 fund as moneys that exist that are the result of efforts by

21 an organization that is involved in perhaps other activities,

22 not specifically political ones. A corporate PAC is an example.

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1 Efforts have been made to discriminate between the
2 corporate contributions, which are illegal, and contributions
3 that are solicited by separate organizations sanctioned by FEC
4 to solicit political contributions from members of organizations,
5 members of corporations, members of other entities.
6 As for a segregated fund with regard to MediAmerica
7 and NRCC, I think that was always an honest effort to become
8 involved, have an organization that we would basically have
9 some control in the decisions of what the organization would do
10 in the long run, and to try and get that going.
11 Those were my interests and I'm sure those were
12 the interests of Rich. They weren't to create business for
13 MediAmerica. As it turns out, it did, but I don't think there
14 was any concerted effort to make a fast buck. I don't see any
15 reason to do that, particularly when we had been involved in
16 the political process and in the political area, offering
17 services to people in the political process.
18 I can say that in retrospect it was a mistake to do
19 what we did because we didn't have the people, resources, to
20 make sure that they were segregated efforts, segregated funds.
21 That's not to say the funds weren't segregated.
22 They certainly were. MediAmerica just acted as a vendor to

8 3 0 4 0 4 5 1 2 5

1 that committee. MediAmerica was very competitive in the area
2 of services it provided the committee.
3 Q. So you are saying there were no violations of
4 441(b), the corporate prohibition, not knowing and willful?
5 A. Absolutely not. I don't believe that.
6 Believe me, and as I was telling the young lady
7 earlier, my departure from MediAmerica was an unpleasant one.
8 It dealt with the area of business judgment, business acumen,
9 et cetera. Certain things have happened that would make me
10 want to fabricate to make it look like something other than
11 what they were.
12 That's certainly not something I want to do. In
13 other words, you might consider me a hostile witness. It was
14 a mistake. A lot of mistakes were made, but there was never any
15 effort to try to circumvent the law. Any laws that were
16 circumvented or any laws that were not dealt with in a proper
17 manner or kept within the law, were mistakes, legitimate
18 mistakes. The regulations can and are pretty confusing.
19 MR. LEVIN: Did you want to make a final statement?
20 We have no further questions.
21 THE WITNESS: Just several different points, and
22 they are just reiterations.

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1 Number one, at the conception and inception of the
2 committee, I personally felt that it was not the best judgment
3 on the part of Rich to start the committee primarily because
4 it would involve, at the time of the inception and conception,
5 too much of our time. It would, in fact, involve a lot of our
6 time to make sure the committee was viable.
7 In fact, if part of the management or policy was
8 totally separate from MediAmerica, we probably wouldn't have
9 had these problems. In other words, if I had resigned
10 MediAmerica and gone to work for the committee, then a lot of
11 the required reports, a lot of the fundraising that had to be
12 done to start up a good solid committee would have been
13 accomplished.
14 So, within the area of strict business judgment,
15 I felt that it was a mistake from the beginning and I told
16 Rich Geske that. He wanted to go with it. I was his executive
17 assistant and felt it was important to support his final
18 decision. I did that to the best of my ability.
19 As far as with respect to any of the questions
20 today, with respect to the responses I have made, they were made
21 at the FEC's request. I would have been happy to come down and
22 be interviewed as a witness to what transpired during the time

5304051 3 1

1 that the National Republican Candidates' Committee was started
2 and ongoing.
3 One of the things that I regret is that, at the
4 outset of the deposition, I was not informed of whether or not
5 I had a choice to go on the record. And, the fact that this is
6 a record that is accessible to the public and can be used by
7 the public, I wasn't informed of, and I want to make a notation
8 in that record that, if there are any statements that I have
9 made during this deposition that might be taken out of context
10 in the future, I just want to make absolutely clear in this
11 public record that my statements have been made in response to
12 questions by Johnny Levin and Steve Mims and that they have
13 been made in all candor and it doesn't mean in the future that
14 those statements are not subject to change, particularly in
15 reference to the National Republican Congressional Committee
16 and its employees and staff.
17 I have differences with some of the policies, but
18 it doesn't mean I consider them ineffective in what they do.
19 I wanted to make sure that was part of the record.
20 I think that's just about it.
21 MR. LEVIN: Before we go off the record, there's
22 one procedural thing. This deposition is merely in

adjournment. It is not terminated. So, you are still under subpoena. If we wish to call you again and arrange a date, we will do that.

THE WITNESS: Do.

MR. LEVIN: So you are still under subpoena. The deposition is merely adjourned, not terminated.

Do you wish to waive signature?

THE WITNESS: No.

MR. LEVIN: Then, we are done.

Thank you very much for coming.

(Thereupon, at 1:36 p.m., the taking of the deposition was adjourned sine die.)

(I have read the foregoing pages 4 through 98, inclusive, which contain a correct transcript of the answers by me to the questions therein recorded.)

John D. Romanin

CERTIFICATE OF NOTARY PUBLIC

I, Sandra Vinson, the officer before whom the foregoing deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken by me in shorthand and thereafter reduced to typewriting under my direction; that said deposition is a true record of the testimony given by said witness; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken; and further that I am not a relative or employee of any attorney or counsel employed by the parties thereto, nor financially or otherwise interested in the outcome of the action.

Sandra Vinson

Notary Public in and for
the District of columbia

My commission expires:
July 14, 1986

8304043513 5

(4a)

First Meeting

1900 N. Beauregard
Suite 12A

August 18, 1980

- Committee Mailing -

1.A. Initial budget 8,800.00 —

1. Mail date 1st prospect
(A) week of Sept. -

FEC Exhibit I
SV
5-21-82

2. Lists - IDR will compile
w 10M for first Mailing

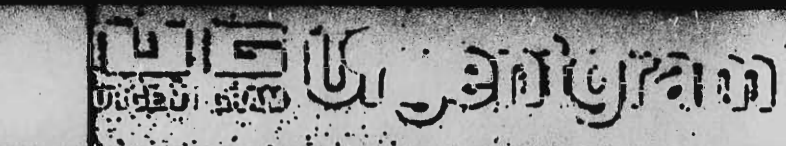
3. Lists of people to request
$ from in order to pay for first
Mailing

1) John Dolan - 100.00
2) G. Lee 50
3) IDR 50
4) RKS 50
5) Hostlings 100.00
6) Romanus 100.00
7) Ueberg - 100.00
8) Foxhower 100.00
9) ~~Brooks Fobich~~
10) Ken Carpenter 100.00
11) Dave Holland 100.00
12. Darline 100.00
13) Paul Moranty 100.00
14) Dan Snyder 25.00
15) Gen. Roberts 25.00
16) I.D. Young 50.00
17. T.R. Young 100.00
18. Rudy Beal 25.00
19. Mrs Mubig 25.00
20. Clark Flex 100.00

Ask. Rhonda Ask 5 people different
for 50-100 - Send Wrap.

FEC Exhibit I
SV 5-21-82

URGENTGRAM SERVICE
ALEXANDRIA, VA. 22



4-012763J2682001 10/25/80 SCI IPNNACC CSP FSCFI
1 703998567 UGM TDMA ALEXANDRIA VA 10-25 0800P EST

Mrs. Carol Reed
Americans For Change
218 North Lee St., #218
Alexandria, Virginia 22314

FEC Exhibit 2
SV 5-21-82

THE FOLLOWING MESSAGE IS TRANSMITTED FROM:

703998567 UGM ALEXANDRIA VA 26 10-25 0800P EST
ZIP

JOHN D. ROMANIN
NATIONAL FINANCE DIRECTOR
NATIONAL REPUBLICAN CAND. COMM.
1900 NORTH BEAUREGARD ST
ALEXANDRIA VA 22311

NEED YOUR HELP IMMEDIATELY! LEAD IN POLLS IS EVAPORATING. CARTER VICIOUSLY ATTACKING REAGAN. GOOD CONSERVATIVES REAGAN NEEDS IN SENATE AND HOUSE OF REPRESENTATIVES SUFFERING FROM BACKLASH OF CARTER ATTACKS. BIG MEDIA AND TELEVISION NETWORKS STEPPING UP ANTI-REAGAN PROPAGANDA. POWERFUL BIG LABOR UNIONS PUMPING MILLIONS INTO LIBERAL CAMPAIGNS DURING FINAL DAYS OF ELECTION. MUST PULL OUT ALL STOPS IN REMAINING FINAL HOURS TO PREVENT DEFEAT. PLEASE SEND MAXIMUM EMERGENCY CONTRIBUTION RIGHT AWAY. NO CONTRIBUTION IS TOO SMALL. CAN'T LET CARTER AND BIG LABOR BOSSES STEAL THIS ELECTION AWAY FROM CONSERVATIVES. PLEASE SEND CHECK NOW FOR ELEVENTH HOUR VICTORY EFFORTS. LAST PUSH TO WIN IN FULL SWING. NO SECOND CHANCE AT THIS LATE DATE. ITS WIN OR LOSE NOW. PLEASE HELP. PLEASE HELP. MAKE YOUR CHECK PAYABLE TO: NATIONAL REPUBLICAN CANDIDATE COMMITTEE. PLEASE SEND TODAY.

0800 EST

UGMCOMP UGM

***** REFOLD ENTIRE URGENTGRAM AND RETURN
WITH CHECK ENCLOSED IN SPECIALLY MARKED ENVELOPE.

TO REPLY BY URGENTGRAM, CALL (703) 998-0338

(4(a) and 4(b))

AMERICA

Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 998-0334

National Republicans Candidates
Committee
1900 N. Beauregard St., Ste. 12
Alexandria, VA. 22311

October 27, 1980

Job #0037 Invoice #758

Production and mailing services. Total count 8778 Urgent Grams. Drop date 10/25 & 10/26/80.

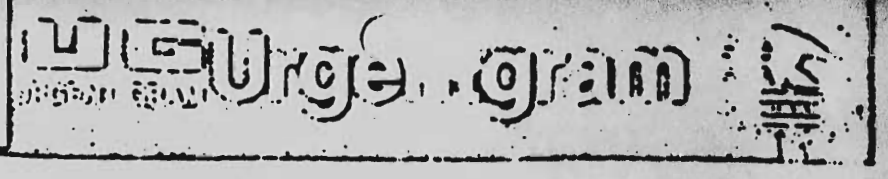
| | |
|---|---|
| Production: | |
| 8778 @ .50/each | $ 4,389.00 |
| Set-up | 10.00 |
| Printing: | |
| BRE #9 Blue (15K) | 569.82 |
| Carrier Window (15K) | 636.00 |
| Live stamp application | 50.00 |
| Stamp Spoilage | 17.00 |
| Postage for 8778 | 2,633.40 |
| Total Due | $8,305.92 |

All invoices are due and payable upon receipt. All charges are payable 20 days from date of invoice. A service charge of 1.5% per month (equivalent to 18% per year) will be added to past due items.

FEC Exhibit 3

SV 5-21-82

NATIONAL URGENTGRAM SERVICE CENTER
1900 N. BEAUREGARD ST. #12
ALEXANDRIA, VA. 22311



##### 4-0]2453 J 234]]2 12/5/80 SIC CPS FSCFI
1 7039980334 UGM TDMA ALEXANDRIA VA 12/5 0900 EST

Mr. ronald Davis
3129 S. 14th St.
Arlington, VA 22204

THE FOLLOWING MESSAGE IS TRANSMITTED FROM: NATIONAL REPUBLICAN CANDIDATE'S COMMITTEE..... JOHN D. ROMANIN.....NATIONAL FINANCE CHAIRMAN..... 0900 EST 12/5

ON BEHALF OF PRESIDENT-ELECT RONALD REAGAN AND MYSELF, THANK YOU! ..... Mr. Davis, MAKE NO MISTAKE ABOUT IT..... RONALD REAGAN IS PRESIDENT BECAUSE OF YOUR BELIEF IN THE MAN AND THE PRINCIPLES HE REPRESENTS AND BECAUSE OF YOUR ENDURING SUPPORT.....I ALSO WANT TO EXTEND MY PERSONAL GRATITUDE TO YOU FOR HELPING ELECT A REPUBLICAN MAJORITY TO THE U. S. SENATE..... IT'S THE FIRST TIME IN OVER 26 YEARS REPUBLICANS HAVE CONTROLLED THE "UPPER CHAMBER"..... THIS VICTORY IS EVEN MORE GRATIFYING BECAUSE MANY GOOD CONSERVATIVES LIKE SENATORS THURMOND, HATCH AND GARN WILL BECOME CHAIRMEN OF VERY POWERFUL COMMITTEES..... ADDITIONALLY, OUTSTANDING CANDIDATES LIKE STEVE SYMMS FROM IDAHO AND PAULA HAWKINS FROM FLORIDA WILL GREATLY INCREASE OUR STRENGTH IN THE SENATE..... NONE OF THESE GAINS COULD HAVE BEEN POSSIBLE WITHOUT YOUR PERSONAL COMMITMENT..... BUT NOW I MUST TURN MY ATTENTION TO HELPING THESE NEWLY ELECTED "REAGAN" SENATORS AND CONGRESSMEN..... COMBINED, THEY HAVE CAMPAIGN DEBTS TOTALING $1.2 MILLION...THEY REALLY DESERVE HELP...MANY CAMPAIGNED 16-18 HOURS A DAY FOR MONTHS BEFORE THE ELECTION SO AS NOT TO LET US DOWN..... AND IN THE RACES THAT WERE TOO CLOSE TO CALL, I URGED EACH CANDIDATE TO SPEND A MINIMUM OF $50,000 ON LAST MINUTE TV AND RADIO ADVERTISEMENTS WITH MY PROMISE TO HELP THEM AFTER THE ELECTIONS..... I KNEW THAT IN A CLOSE RACE, HEAVY TV AND RADIO SATURATION WOULD PUSH THEM OVER THE TOP..... MY STRATEGY WORKED BUT CAMPAIGNS HAD TO GO INTO DEBT..... WITH MASSIVE DEBTS NOW HANGING OVER THEIR HEADS THEY CAN'T CONCENTRATE ON THEIR WORK..... MORE IMPORTANTLY, NEW CONSERVATIVES WITH LARGE DEBTS BECOME A PRIME TARGET OF WEALTHY LIBERALS AND POWERFUL LABOR UNIONS WHO HAVE SWORN "TO GET EVEN"..... PLEASE HELP ME KEEP MY PROMISE TO HELP THESE GOOD CONSERVATIVES PAY OFF THEIR DEBTS..... Mr. Davis, WON'T YOU SEND THE NAT. REP. CANDIDATE'S COMM. $50 OR PERHAPS $100 OR MORE SO THAT I DON'T HAVE TO BREAK MY PROMISES TO THEM..... I APOLOGIZE FOR NOT CONSULTING WITH YOU BEFORE ADVISING OUR CANDIDATES TO GO INTO DEBT IN ORDER TO WIN, BUT THERE WASN'T ANY TIME TO CONTACT YOU IN THE REMAINING DAYS OF THE ELECTION.... I HOPE YOU'LL FORGIVE ME AND HELP THE COMMITTEE NOW BY SENDING AS GENEROUS A CONTRIBUTION AS POSSIBLE..... GOD BLESS.....

0900 P EST JOHN. D. ROMANIN..... NATIONAL FINANCE CHAIRMAN

****** PLEASE REFOLD ENTIRE URGENTGRAM AND RETURN WITH CHECK IN ENCLOSED ENVELOPE - MAKE CHECK PAYABLE TO NATIONAL REPUBLICAN CANDIDATE'S COMMITTEE.******

FEC Exhibit 4
SV 5-21-82
2 pages

TO REPLY BY URGENTGRAM CALL URGENTGRAM AT (703) 998-0338

Urgentgram

THE MESSAGE ENCLOSED WAS TRANSMITTED TO THE URGENTGRAM CENTER AND MAI

A POST OFFICE BOX NEAR YOU

8 3 0 4 0 4 5 1 3 9

# MEDIAMERICA

Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

INVOICE
000010

All charges are payable 30 days from date of invoice. A SERVICE CHARGE of 1.5% per month (equivalent to 18% per year) will be added to past due items.

National Republican Candidates Committee
1900 North Beauregard Street, #12
Alexandria, Virginia 22311

| Account Number |
|---|
| |

Job #0090

PURCHASE ORDER NO.

Please Send One Copy With Remittance

| DATE | INVOICE NUMBER | DESCRIPTION | AMOUNT |
|---|---|---|---|
| 12/12/80 | | Composition/Production of 12,245 UrgentGrams. Drop date - December 5, 1980. | |
| | | -Copy Creative Fee | $ 1,000.00 |
| | | -UrgentGram @ .50/unit | 6,122.50 |
| | | -Printing - Envelopes 20K Blue Wove Black Ink | 584.35 |
| | | -Postage (.15 each) | 1,836.75 |
| | | TOTAL DUE | $ 9,543.60 |
| | | Paid on Account 1/10/81 - Ck. #116 | 2,000.00 |
| | | BALANCE DUE | $ 7,543.60 |
| | | Claims for defects, damages or shortages must be made in writing within a period of ten (10) days after delivery. | |

STEVE SYMMS
IDAHO

# United States Senate

WASHINGTON, D.C. 20510

March 30,1981

Mr.Richard Geske
National Candidates Committee
1900 N. Beauregard Street
Alexandria, Virginia 22311

Dear Mr. Geske:

This is in response to your request for clarification as to the use of my name in your Committee's December 5th fundraising solicitation.

As you aware, I was not asked if my name could be used in this solicitation, and therefore, did not authorize such use in advance.

Please be informed that although I was not aware of the use of my name in your letter, I personally have no objection at this time. Had your Committee requested the use of my name I would have seriously considered such a request and most likely would have engaged in the fundraising effort.

I appreciated the contribution received by my own Campaign Committee and look forward to your continuing support in the future.

Best regards.

Sincerely,

Steve Symms

Steve Symms
United States Senator

SS:att

FEC Exhibit 5
SV 5-21-82

83040051411

245-5023

UNITED STATES POSTAL SERVICE
475 L'Enfant Plaza, SW
Washington, DC 20260

DEC 12 1980

Media America
1900 N. Beauregard St., #12
Alexandria, Virginia 22311

Dear Sir or Madam:

It has come to our attention that your "Urgentgram" mailing envelopes include an altered eagle logotype, obviously copied from the U.S. Postal Service seal and emblem. You are advised that affixing such altered seal to paper is a criminal violation carrying a fine of up to $5,000, imprisonment for up to 5 years, or both. 18 U.S.C. §506.

The Postal Service emblem, in addition to being the official seal of the Postal Service, is also its registered trademark and service mark, Registration No. 975,033. As I am sure you are aware, a trademark owner must take the actions necessary to assure that its marks are not misused.

Because of the seriousness with which we consider this matter, we must require the unequivocable written assurance that you will cease all use of the Postal Service emblem or any imitation thereof.

Sincerely,

T. Major

Theodore Major
Patent Counsel

FEC Exhibit 6

SV 5-21-82

8 3 0 4 0 5 1 4 2

UNITED STATES POSTAL SERVICE
475 L'Enfant Plaza, SW
Washington, DC 20260

JAN 21 1981

Media America
1900 N. Beauregard St., #12
Alexandria, Virginia 22311

Dear Sir or Madam:

On December 12, 1980 we wrote to you asking that you cease the use of the altered eagle logotype which is the seal and emblem of the United States Postal Service and our registered trademark/service mark, Registration No. 975,033. You have not yet responded.

Since that time we have been informed of your continued, widespread violation of both the Criminal Code, Section 506 of Title 18 of the United States Code and of our property rights in the United States Postal Service emblem trademark, Registration No. 975,033.

You are hereby advised that if we do not have your unequivocable written assurance within 10 days of the date of this letter that you are ceasing all use of the Postal Service emblem, any imitation or alteration of the emblem, the Department of Justice will be provided with the necessary information to take immediate steps to enforce both the criminal and civil violations.

Respectfully,

T. Major

Theodore Major
Patent Counsel

FEE Exhibit 7

SV 5-21-82

# 1980 REPUBLICAN SENATORIAL WINNERS

(6)

FEC Exhibit 8
SV 5-21-82

| | | | |
|---|---|---|---|
| AL | Jerry Denton<br>Denton for Senate<br>3443 Armour Dr.<br>Box 1980<br>Mobile, Alabama 36601<br>(rep. pick-up) | Admiral Denton<br>~~Roy Adams: Charge counterpart~~<br>(which doesn't need him)<br>~~DAVE KITCHEY~~ / MIKE ~~WOR~~ WERMUTH | (205)479-6562 |
| AK | Frank Murkowski<br>Murkowski for U. S. Senate<br>~~524 W. 6th Ave.~~<br>Anchorage, Alaska 99501<br>(rep. pick-up) | EXECUTIVE ASSISTANT<br>~~BILL McCONKEY~~<br>437 E. ST Suite #30 | (907)276-3335 |
| AZ | Barry Goldwater<br>Goldwater for Senate Committee<br>Box 39515<br>Phoenix, Arizona 85069<br>(incumbent) | STEPHEN C SHADEGG<br>~~STEPHEN SHADEGG~~ Ass Atty<br>377 N. 3rd Ave<br>PHOENIX AZ 85005 | (602)258-8169 |
| FL | Paula Hawkins<br>Paula Hawkins for Senate<br>Box 12637<br>Tallahassee, Florida 32308<br>(rep. pickup) | DON WEIDNER<br>TREASURER | (904)224-3207/5748 |
| GA | Mack Mattingly<br>Friends of Mack Mattingly<br>Box 1980<br>Atlanta , Ga. 30301<br>(rep. pick-up) | MARY EGBERT<br>CAMPAIGN MANAGER<br>~~TREASURER~~ | (404)231-5715 |
| ID | Steve Symms<br>Symms for Senate<br>Box 471<br>Boise, Idaho 83701<br>(rep. pick-up) | PHIL REBERGER<br>CAMPAIGN MANAGER | (208)344-1776 |
| IN | Dan Quayle<br>Quayle for Senate<br>Box 216<br>Indianapolis, Indiana 46206<br>(rep. pick-up) | MARK MILES<br>CAMPAIGN MANAGER<br>DAVID CULP & CO. | (317)636-8080 |
| IA | Charles Grassley<br>Grassley for Senate<br>Box 1000<br>Des Moines, Iowa 50306<br>(rep. pick-up) | TREAS - JOHN HENSS<br>CAMPAIGN MGR. - JOHN MAXWELL | (515)243-1980 |
| KN | Robert Dole<br>Dole for Senate<br>1001 Kansas Ave.<br>Topeka, Kansas 66612<br>(incumbent) | CAM CARLY DUNN<br>TREAS - CHARLES CLINKENBEARD | (913)233-1203 |

no longer 11/11/80

Charles Mathias
Marylanders for Mathias
9300 Georgia Ave.
MD. Silver Springs, Maryland 20910
(301) 588-0383
(Incumbent)

Paul Laxalt
Laxalt for Senate
Box 2207
NV. Carson City, Nevada 89701
(702)883-7711
(Incumbent)

JERRY DONDERO C MGR
OLLIE KINNEY TREAS

Warren Rudman
Warren Rudman for U. S. Senate
Box 2016
Concord, NH 03301
NH (603)225-5384
(rep. pick-up) Dear Senator-elect Rudman

MR ALLAN WALKER C MGR Campaign Manager
Mr William Phillips TREAS

Alfonse D'Amato
Friends of Al D'Amato
18 E. Sunrise Hwy., Suite 301
NY Freeport, N. Y. 11520
(212)582-1772 Dear Senator-elect D'Amato

MR. CARL OTTOSEN C MGR
CARL Wyandler TREAS

John East
John East for Senate Committee
Box 26493
NC Raleigh, N.C. 27611 Dear Senator-elect
(919)782-7331
(rep. pick-up)

Mark Andrews
Andrews for Senate Committee
Box 1773
ND Fargo, ND 58107
(701)232-8030

ED DOHERTY C MGR
Robert C. RUST TREAS

Don Nickles
Nickles for Senate
Box 1549
OK Ponca City, Oklahoma 74601
(405)762-1628

Robert Packwood
Reelect Bob Packwood Committee
Box 619
OR Portland, Oregon 97207
(503)249-0411
(incumbent)

Dear Senator

Arlen Specter
Specter for Senate
PA

Suite 1402
Western Savings Bank Building
Broad & Chestnut St.
Philadelphia, Pa. 19107

(215)546-9750

SD Jim Abdnor
Friends for Jim Abdnor
Box 5004
Sioux Falls, South Dakota 57117
(605)331-2000
(rep. pick-up)

Dear Congressman

UT Jake Garn
Jake Garn Campaign Committee
Box 11998
Salt Lake City, Utah 84147
(801)532-2080

Dear Senator

Michael Leavitt C. Mgr.
Darrel Newman Treas.

WI Robert Kasten
Kasten for U. S. Senate
8665 N. Port Washington Rd.
Milwaukee, Wisconsin 53217
(414)351-6615
(rep. pick-up)

Dennis Howell Mgr.
Dear Cong. Mike Grebe C. Dir

WA Slade Gorton
Gorton for Senate
500 Wall Street
Seattle, Washington 98121
(206)447-9720
(rep. pick-up)

Helen Rasmussen Mgr.
Carl Williams

Sen.-elect

Speaker-Elect Paula Hawkins

3304045146

**SCHEDULE B** — **ITEMIZED DISBURSEMENTS**

Page 1 of 2 for
LINE NUMBER 21
(Use separate schedule(s) for each category of the Detailed Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (In Full)
NATIONAL REPUBLICAN CANDIDATES COMMITTEE

| Full Name, Mailing Address and ZIP Code | Purpose of Disbursement / Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
|---|---|---|---|
| A. Symms for Senate<br>P. O. Box 471<br>Boise, Idaho 83701 | Contribution (Agg. 500.00) | 12/29/80 | 500.00 |
| B. Hawkins for Senate<br>P. O. Box 12637<br>Tallahassee, FL 32308 | Contribution (Aggr. 500.00) | 12/29/80 | 500.00 |
| C. McCollum for Congress<br>P. O. Box 732<br>Altamonte Springs, FL | Contribution (Aggr. 500.00) | 12/29/80 | 500.00 |
| D. Carman for Congress<br>266 Main Street<br>Farmington, N. Y. 11735 | Contribution (Aggr. 500.00) | 12/29/80 | 500.00 |
| E. Grassley for Senate<br>P. O. Box 1000<br>Des Moines, IA 50306 | Contribution (Aggr. 500.00) | 12/29/80 | 500.00 |
| F. Mattingly for Senate<br>P. O. Box 1980<br>Atlanta, GA 30301 | Contribution (Aggr. 500.00) | 12/29/80 | 500.00 |
| G. D'Amato for Senate<br>1697 Broadway<br>New York, N. Y. 10019 | Contribution (Aggr. 500.00) | 12/29/80 | 500.00 |
| H. Hunter for Congress<br>2309-1/2 National Avenue<br>San Diego, CA 92113 | Contribution (Aggr. 500.00) | 12/29/80 | 500.00 |
| I. Molinari for Congress<br>1720 Hylan Boulevard<br>Staten Island, N.Y. 10304 | Contribution (Aggr. 500.00) | 12/29/80 | 500.00 |
| SUBTOTAL of Disbursements This Page (optional) | | | 4,500.00 |
| TOTAL This Period (last page this line number only) | | | |

FEC Exhibit 9

SV 5-21-82

SCHEDULE B

# ITEMIZED DISBURSEMENTS

Page 2 of 2 for
LINE NUMBER 21
(Use separate schedule(s) for each category of the Detailed Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)
NATIONAL REPUBLICAN CANDIDATES COMMITTEE

| | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement This Period |
|---|---|---|---|
| A. Full Name, Mailing Address and ZIP Code<br>LeBoutillier for Cong<br>202 Winthrop<br>Westbury, N.Y. 11590 | Contribution (Aggr. 500.00)<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 12/29/80 | 500.00 |
| B. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| C. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| D. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| E. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| F. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| G. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| H. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| I. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| SUBTOTAL of Disbursements This Page (optional) | | | 500.00 |
| TOTAL This Period (last page this line number only) | | | 5,000.00 |

Gcc# 8151

# Milton Reporting, Inc.

R.E. Milton
President
F.R. Joyce
V.P. & General Mgr.
M.M. Hope
Treasurer

General Stenotype Reporting
Suite 301
1601 Connecticut Ave., N.W.
Washington, D.C. 20009

Phone:
202-833-3598
202-833-3599

Notary Public
D.C.-Va.-Md.

July 23, 1982

JUL 23 P 3:08

Jonathan Levin, Esq.
Federal Election Commission
Suite 700, 1325 K Street, N.W.
Washington, D.C.

RE: NATIONAL REPUBLICAN CANDIDATES' COMMITTEE, et al.
MUR No. 1363 - DEPOSITION OF TERE LINEHAN
MAY 19, 1982

Dear Mr. Levin:

The deponent has been notified by letter dated June 4, 1982 of the availability of the original copy of the above referenced deposition for reading and signing in our office.

As of this date, we have not heard from the deponent requesting an extension of time nor indicating a desire to read and sign the transcript. Therefore, the original copy (unsigned) is being forwarded to the court for filing.

Sincerely,

Fred R. Joyce
General Mgr.

cc:
file
court

8304035149

ORIGINAL

Before the

FEDERAL ELECTION COMMISSION

| | |
|---|---|
| In the Matter of: | |
| NATIONAL REPUBLICAN CANDIDATES' COMMITTEE, et al. | MUR 1363 |

Washington, D.C.

Wednesday, May 19, 1982

Deposition of

TERE LINEHAN

a witness in the above-entitled matter, was called for examination by counsel for the Federal Election Commission, pursuant to notice, taken at the offices of the Federal Election Commission, 1325 K Street, NW, Washington, D.C., beginning at 10:15 a.m., before Sandra Vinson, a Notary Public in and for the District of Columbia, when were present on behalf of the respective parties:



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**For FEC:**

Jonathan Levin
Attorney
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C O N T E N T S


| WITNESS | EXAMINATION |
|---|---|
| Tere Linehan | 3 |


E X H I B I T S


| FEC Exhibits Marked for Identification and Attached: | Page |
|---|---|
| FEC Exhibit 1: August 18, 1980, first meeting, committee mailing list | 34 |

Thereupon

TERE LINEHAN

a witness, was called for examination by counsel for the Federal Election Commission and, after having been first duly sworn by the notary, was examined and testified as follows:

EXAMINATION BY COUNSEL FOR THE FEDERAL ELECTION COMMISSION

BY MR. LEVIN:

Q. State your name and address for the record, please.

A. Tere Linehan, 1515 South Jefferson Davis Highway, Arlington, Virginia.

Q. What is your present occupation?

A. I'm promotion manager for United Fresh Fruit and Vegetable Association.

Q. Were you employed at MediAmerica?

A. Yes, I was.

Q. For what dates were you employed?

A. From January 5, three-and-a-half years ago. Is that 1979?

Q. 1979.

A. Through, like, December 31, 1981.

Q. And, in what capacity was your job there?

A. I was phone-bank manager.

Q. Did you do anything else besides manage the phone bank?

A. Special fund-raising events sometimes and direct-mail pieces for some of the clients, but I was not the writer for the clients.

Q. But, in terms of discussion, what was your function there?

A. What is a phone-bank manager?

Q. For the other things. In other words, you would talk to somebody if you needed clarification.

A. The president, Rich Geske.

Basically, he was the writer for the company for the direct-mail pieces and, occasionally, he would have a direct-mail piece that we would read and make suggestions on but that was not very often.

Q. Would you elaborate on the phone-bank manager function?

A. What it is?

Q. Yes.

A. We would have clients who wanted fund-raising. Most of the clients were political candidates or political

organizations, and I would hire and fire and train the callers and support staff.

Along with it, we did test programs for non-political clients, such as the European Health Spa, but basically it was all political clients.

Q. Would you man the phones?

A. Not for fund raising. When we would do the surveys, I would do it just to maintain continuity on a small survey. But, I did not do fund raising. I'm not a good phone caller for fund raising.

Q. Were you employed by the National Republican Candidates' Committee, now called the National Candidates Committee?

A. No. The idea was that, if they ever got off the ground, then they would be considered a possibility for a phone-bank client. But, they never did, so I never got them as a client.

Q. So, no one ever came to you and said you are going to do some work for MediAmerican and some work for the National Republican Candidates' Committee?

A. In other words, for the phone bank they had to have 10,000 names of contributors and that required a pretty solid

organization.

Q. As far as you know, was there ever any phone-bank operation done by MediAmerica for the committee?

A. Not that I know of. There was no active phone bank.

Our offices were set off from the administrative offices. They were, like here, and you walked through a set of doors to the phone bank and computer bank. I never was involved and my employees were never involved in one. If any calls were made, it would have been someone from the administrative offices.

Q. Did you have anything to do with the committee other than the phone bank?

A. No. I didn't have a phone-bank operation that I was involved in for them.

Once in a while, I would walk into the administrative offices and I would hear comments being made. In Shirley King's office, I would come in while she was opening the money and recording it, but that's the extent of my knowledge in working around the organization.

Q. You never helped in the opening of envelopes or anything of that sort?

A. No. She was the accountant. They didn't come in

volume. A hundred-dollar contribution would come in, or $1,000 would come in, but not anything of volume.

Q. Do you have any idea of the relevant size of the checks?

A. No. Checks as a whole from political organizations would come in anywhere from $5 to about $100.

It would be like, if I was there and she was opening them, they would be there. So, I have no idea how much they raised as a total for an organization.

Q. Do you recall any checks for over $100?

A. No. There could have been.

It was kind of like another world. It sounds strange, but my office was autonomous and they did their own thing. I don't remember.

A $1,000 check did come in, yes.

Q. But, you would hear things about this, the MediAmerica operation for the committee, around the office?

A. Very little. The person who was in charge was not exactly a friend of mine, so I did not inquire about what he was doing.

Q. Who was that?

A. John Romanin.

Q. I'm going to read a list of names and I would like you tell me what their function was with MediAmerica.

The other thing I would like you to do is just tell me if that person also had someting to do with the committee.

Richard Geske.

A. He is the president of MediAmerica and, to my knowledge, he and John Romanin did the work for it. How much he was involved, I don't know.

Q. For the committee?

A. I don't know how much he was involved with the committee, and John and I didn't discuss things. I was not a friend of John's and I didn't care what he did. That's very nasty but ---

Q. As far as John Romanin, do you know what he did for the committee?

A. I'm not sure exactly what his role was with the committee. He did a number of things at MediAmerica.

He was the one who went out and researched the buying of the computer and the programming of it. He would go out and get the clients for MediAmerica. This would be computer-type clients, special fund-raising event clients.

He was kind of like Rich's assistant, the vice

president, that kind of category. But, there was never a title that I know of.

Q. Did he make any decisions on his own?

A. Yes. That didn't mean that Rich necessarily knew about it.

Q. What kind of decisions that Rich didn't know about?

A. John made a lot of decisions that involved people without telling them until they found out about it later.

Q. Would those decisions result in the spending of money by the company?

A. Sure.

Q. Large sums?

In other words, these were significant decisions that probably he should have told Mr. Geske about?

A. Probably.

Q. Do you have an example of that?

A. He might make a deal with a client to do a job for a certain amount of money and that was not within the guidelines of the company's policy. It might be considerably less than what the company normally charged for the services.

He would make that decision and do a lot of things that he should not have done.

Q. Do you know if he did anything with respect to the committee?

A. I don't know.

It was so rarely discussed around me. I would have to ask: how is the money coming in? And, it would be: it's coming in good, or, it's slow now.

That's why I'm not sure how much he had to do. It was not that active of a committee that long to my knowledge. It was kind of there. There was one direct-mail piece that I know of and I don't think it did anything.

There might have been a second mailing. John ran the computer center which produced the letters. I didn't know what clients were running letters, but I know of one direct-mail piece. I don't know after that.

Q. Would you elaborate on the mail piece? Do you have any idea to whom it was sent and what it involved? When it was generated?

A. I think it was an Urgentgram. It may not have been, but I think it was. It was sent to some sort of list that John had, a computer list. I don't really know.

I know that the phone-bank names were not allowed to be a part of the list because that's in the deal with the

clients. The in-house file was exclusively for the phone bank and we were not to sell, loan, or rent the use of the names I had in any way, shape, or form.

Q. In other words, it might have been a part of MediAmerica or been another part of MediAmerica?

A. Not without permission. If they wished to sell their list, which nobody in MediAmerica did.

The fund-raisers, once a list was developed, that list is co-owned by both of you. When I left, that was one of the selling points that I had discussed with Rich Geske. They don't want their names used and re-used over and over again.

Q. To continue with the list of names: Maiselle Shortley?

A. She was like a secretary or treasurer of MediAmerica. She is on the board. I never attended any of the board meetings of MediAmerica, so I don't know if she had anything to do with the candidates' committee or not.

Q. What about Rhonda K. Stahlman?

A. Rhonda had some office on the MediAmerica board, she and Maiselle, but I don't know. They came to meetings. That was about it. I don't know what their positions or roles were.

Q. Did they have any involvement with the committee?

A. Not to my knowledge.

Rich and Rhonda were close friends. I'm sure that Rhonda was aware of it, but I can't imagine any reason she had any involvement with it.

Q. What about Karen Dent?

A. Karen used to be our bookkeeper and she was there right before Shirley King came.

Q. Was she involved with the committee?

A. I think the committee was trying to get started right before she left, give or take a couple of months.

It was all kind of out in that other office. She would have done whatever Shirley was doing. If any money came in, prior to Shirley's coming in, Karen would have been responsible for recording it. But, she would not have written anything.

Q. Did Karen ever speak to you about what she did for the committee?

A. I think it was right at the end, when she was leaving. See, I don't remember when the committee started getting its act together and doing something.

She left, like, at the end of June, in July. If

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you have any record of activity before then, she would have been around and serving in some sort of bookkeeping type of capacity.

Q. How about Shirley King?

A. She was the bookkeeper. I know she was the one that received the checks when they came in and recorded who they came in from and whatever papers had to be filled out for the FEC and whatever else had to be filled out.

Q. Before I ask you about any more names, I would just like to ask you about Mr. Geske, Mr, Romanin, Ms. Dent, and Ms. King. These were the ones mentioned as pretty much involved with the committee.

How much time would they be spending at work on the committee?

A. I wouldn't say very much time.

See, here again, they were like here. I went there, like, twice a day to get a drink of water or something.

Q. They were on a different floor?

A. No. It was a strange setup. It was a huge, long, L-shaped office, and there was a door and a divider. All the administrative offices opened up into a central hall and the walls were thin and you could hear anything that was going on,

if you were in the front offices.

If you walk through the door, there was a huge, open, L-shaped section, which housed the phone bank and which was very noisy, and the computer section. All the typewriters were going and the whole section was very noisy.

I didn't have any reason to go up front generally. My section functioned like a separate little company. It was part of MediAmerica, but I was totally in charge of it. At the time, I probably had around fifty to a hundred employees. So, I was very busy. That's why any knowledge I have isn't that much, but the committee didn't do that much.

Q. In terms of time, let's say, would you put in a forty-hour week?

A. No one worked forty; eighty was more like it.

Q. Let's say in an eighty-hour week, then, how many hours would have been devoted to the National Republican Candidates' Committee?

A. Well, one direct-mail piece was developed, and Shirley King worked an hour or two every day. That's all I know from walking through when she would be working on those checks.

I really can't say about Rich and John. They would

1 get there at 6:00 or 7:00 in the morning and leave, like, 9:00
2 at night. When they were in the office, I don't know if they
3 were discussing the candidates' committee, but in fact that
4 committee did not do very much. I would say it was very little
5 time. It was just not that active.
6 Q. Wally Brill?
7 A. Wally was our accountant. He was our accountant
8 up to about the time that Karen left, a little bit longer.
9 Then, they hired another firm whose name I can't remember but
10 it's in Old Town somewhere.
11 The only thing he would have done is to handle the
12 MediAmerica books. Now, whether he did anything about the
13 candidates' committee or not, Shirley would know. After doing
14 the books, she would have to do the FEC forms. Then, probably
15 he was the one that was called.
16 Q. Did you overhear whether he was involved with the
17 committee?
18 A. No. If Shirley needed an answer for a form, she
19 probably would have called Wally.
20 Q. Hal Stalvik?
21 A. Hal was a computer programmer and operator. The
22 only involvement he would have had was to see that direct-mail

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pieces were typed into the computer. He would know about the names in the computer, possibly which names were used in the direct-mail pieces.

He would have been responsible for getting the direct-mail pieces typed, stamped, and mailed. Other than that, I don't thing he was involved in any type of management.

Q. And, that function that he performed, would it be any different for the committee than any client?

A. No. As with my clients, it's the same thing. They're just another client.

Q. Curt Herge? J. Curtis Herge?

A. He's a lawyer, the lawyer for MediAmerica.

I would imagine he would have given counsel to Rich or John in setting up the committee, trying to work it out.

Q. Did you hear anything about that in the office?

A. I never even met him. He was one of the names on the other end of the line.

Q. How about Dennis Davis?

A. No. Who is he?

Q. I'd like to know myself.

Michael Hughes?

A. No.

Q. Bunny Wheeler?

A. Bunny was, in the first setup, she was a receptionist. That was the first setup. During the summer holidays, she would do odd jobs around the office. Then, after that summer, they tried to make her a secretary, but she was really not a secretary so they let her go.

Q. Did she have anything to do with the committee? Did she do any work for the committee?

A. Unless she was typing rough drafts for direct mail, something to that extent. But, Rich and John were better typists than Bunny.

Q. How about, I have initial "G" and the last name is Weber?

A. Gail Weber?

Q. MediAmerica lists this person as director and vice president.

A. She might be that girl out in California. That might be who that is. I never met the person.

There is some woman in California that Rich knows and I don't know what their relationship is or was, but the name would come up occasionally.

Q. Did she have anything to do with the committee?

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A. I don't know. I never met her. I know that once in a while she came to Washington but, under what capacity, I don't know.

Q. We were also given another name: O. Seese. That's S-e-e-s-e.

A. No.

Q. As secretary or treasurer.

A. Of what?

Q. MediAmerica.

A. That's not a name I remember hearing.

Q. How about Jack Kamak?

A. Jack Kamak was kind of a gofer. He would man computer sales or machine mailing.

Q. In general for the committee?

A. No. He didn't have anything to do with the committee. To my knowledge, he was just with MediAmerica. He could have sat in on meetings with Rich and John when they were discussing things. He asks a lot of questions and he was up in the front office.

He had political contacts and it's possible, out of curiosity, he had gotten involved in it. But, I don't know if the committee was functional while he was there. He came

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in about the time it stopped.

Q. About the time the committee stopped?

A. Didn't it stop in August or September?

Q. Of what?

A. When did Shirley come? In 1980?

MR. MIMS: Yes.

BY MR. MIMS:

Q. There was a mailing around December of that year.

A. Was it that late. I was thinking it was that summer. Maybe not.

Q. We have identified that it was around December 5, 1980. About 12,000 pieces.

A. Jack would have been around at that time. I was thinking it was all over that summer.

Q. In August?

A. (Nods)

BY MR. LEVIN:

Q. But, you don't know if he had anything to do with the committee?

A. Jack would enter into any conversation or get himself into any conversation so, if he did, it was probably on the periphery of it. I suppose he could have been involved.

They were out there.

Q. Carolyn Phelps?

A. Boy, that name sounds familiar.

Q. It says she was a secretary.

A. Oh, yes. She was with us about two-and-a-half months. She came in December and left around February.

Q. December of 1980 to February of 1981?

A. That would have been right.

Q. Did she do anything for the committee?

A. She, if anything, might have typed rough drafts. She may have answered the phone. I don't know.

I know, when there was a problem about the National Republican Candidates' Committee, we stopped answering the phones. There was one line dedicated to the committee, which was only on the front desk and Shirley's desk. Then, it had its own desk in another room.

At that time, we were also having trouble with the name of the committee and she may have answered the phone. I don't know. I don't remember when that happened.

Q. You say they stopped answering the phone. When did they stop answering that line?

A. When there was something in court about the

National Republican Candidates' Committee because they said the organization did not have the right to call themselves the National Republican Candidates' Committee and there was something about it in court.

Q. The possible threat of a suit, I guess.

A. Yes. I think rather than to continue, everything was put to a screaming halt.

Q. Would you elaborate on how that was set up in terms of a separate line for the committee? Was there a whole separate line or was it like a separate push-button?

A. It was a separate button that was only on Shirley's phone. I don't remember if Rich or John had it on their phones, but it was on the secretary's phone. Initially, it was just on the secretary's phone.

Q. Carolyn's?

A. Yes. Then there was another phone in the big room up front that also had it, so I think it had like two lines and Shirley had it put on her phone.

Q. Shirley King?

A. Right. Really, she used it if other lines were busy, I think.

It was kind of like people get confused. They would

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be given our phone number when they were trying to get the National Republican Committee. We always gave them the number when they reached the wrong phone.

It was really a hassle for us to have that phone.

Q. People would call that extension when they actually were trying to the the Republican National Committee?

A. They would be out-of-town calls. I think the information operator was giving them the wrong phone number because I don't remember any calls coming in for the candidates' committee.

Q. Were people careful about using that particular extension?

For instance -- let me break it down -- were instructions given not to use that extension unless they were working specifically on committee business?

A. I would suppose so. Since I didn't have the extension, I was never given any instructions. Now, it would have been to Shirley, or a person like the secretary would have been given instructions.

Q. Would you ever have occasion to use the phone?

A. No. I would answer it, like, when the secretary was on lunch break. I was only to answer it National Republican

Candidates' Committee. That was the kind of instruction. Under no circumstances was I ever supposed to answer the designated line, like, candidates' committee.

Q. Would you log those in or keep any record of calls?

A. We never logged any phone calls in. We had pink slips we handed out.

(Discussion off the record)

Q. Did anybody, to your knowledge or from what you may have heard, ever call that committee number and ask for MediAmerica?

A. Not to my knowledge. I wouldn't know how they would get the number.

Q. One more person: Anita Gosain?

A. Not that I know of.

Q. They said she was a secretary or worked on the books one time? Anita Gosain.

A. There was an Anita that worked in the computer room and Shirley would ask her to work on the employment records for MediAmerica. Is that who it was?

Q. (Nods)

A. Shirley would have -- if she worked on anything, it would have been on the books under Shirley's direction.

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1 Q. But, you don't know whether or not she worked for
2 the committee?
3 A. If Shirley had to get something done and needed
4 some help, Anita -- if that was the girl -- was a minimum wage
5 person. She was like a typist and keyed in, entered into the
6 computer, and occasionally Shirley would use her to help her
7 with the books. Shirley would be the only one to know about
8 that.
9 Q. I'd like to round out the picture of MediAmerica.
10 How many employees does MediAmerica have?
11 A. Almost all were temporary employees while I was
12 working there.
13 Now how many do they have?
14 Q. Well, when you were there, you said you had how
15 many people under you?
16 A. Anywhere from fifty to a hundred, right before the
17 big election.
18 Q. And how many were in the remainder of the office?
19 A. The computer operation ran from five to a hundred
20 at a time. If the work was there, we had a lot of employees.
21 If there was lots of direct-mail pieces, people were brought in.
22 They would be called up and told we got direct-mail pieces to

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go out, and the operation would go.

The front office there was Shirley, a secretary, John, Rich.

BY MR. MIMS:

Q. On the direct mail pieces, the lists that were used, did MediAmerica have exclusive control over any lists? Anything that was exclusively theirs?

A. Not to my knowledge. Unless they had a deal with NCPAC, which I don't think they did.

My lists I was concerned about for my clients. I don't know what they were doing on their own.

BY MR. LEVIN:

Q. How many MediAmerica employees at any one time worked for the National Republican Candidates' Committee?

A. You mean that got a paycheck from them?

Q. Or volunteered or devoted any time.

A. Well, the phone bank didn't have anyone. If the computer did, it was as a client, a MediAmerica client, in other words, so they wouldn't have gotten one.

Q. So, they would get a MediAmerica paycheck?

A. Right. The direct-mail pieces were done for MediAmerica clients. If we did a direct-mail piece for NCPAC

1 or any of the other organizations, they would pay a service fee.
2 We would charge them for the piece, developing the piece and
3 mailing it. Those are MediAmerica functions.
4 Whether or not anyone in the front office got
5 two checks, one from MediAmerica and one from the candidates'
6 committee, I don't know.
7 Q. But it's possible that some people were paid by
8 the committee and not by MediAmerica? Or, in addition to
9 being paid by MediAmerica?
10 A. The bookkeeper, because it was personal business,
11 if she did, she didn't say anything to me about it. That
12 doesn't mean it didn't happen, you know.
13 (Discussion off the record)
14 Q. Now, you say you worked as head of the phone bank?
15 A. Yes.
16 Q. Did you say that the phone bank did not do any work
17 for the committee or did it do some work for the committee?
18 A. It did not do any work for the committee.
19 Q. So, MediAmerica services for the committee involved
20 the mailing operations, these Urgentgrams?
21 A. Probably. To my knowledge, that's all it involved.
22 (Discussion off the record)

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1 Q. Do you remember when the committee was formed?

2 A. No. I was thinking it was just the three months.

3 If Karen was involved, it was created that April or something.

4 Q. 1980?

5 A. 1980.

6 I just thought it was a summer thing. It's so long

7 since I was involved. I just remember Shirley opening the

8 checks. That's the only vivid recollection I have of what

9 happened.

10 Q. What did she do?

11 A. For FEC, the regulations, she had to record the

12 money and name and amount of contribution. She would have to

13 record all that information.

14 Q. What would she do with those checks?

15 A. I suppose she deposited them in the account. You

16 don't just keep checks. You have to do something with them.

17 Q. A separate committee account?

18 A. I would assume so, but I don't know what she did

19 with it.

20 Q. Did the committee have a bank account?

21 A. All its own?

22 Q. (Nods)

3 3 0 4 0 4 5 1 7 5

A. I don't know.

Q. Do you know if the checks were deposited in the MediAmerica account?

A. That I don't know either.

She kept her door shut a lot of the time because she didn't want people in there. I remember it was a hassle to record all this information and she would complain about having to record it all. That's why I remember it, because she was complaining about the checks.

Q. Did she have that information to use for her own purposes?

A. It had something to do with FEC forms.

Q. Do you recall her writing on the checks themselves or directing anybody to write on the checks for endorsement purposes?

A. I don't remember anything about that. I wasn't around. I would just notice when the checks were being opened and that was about it.

Q. From what you have observed, does MediAmerica have other clients for which they would receive checks?

A. We had numerous -- let's see -- I had to work New Year's Eve, all night. We did batching for a client New Year's

1 Eve in 1980, or 1981.

2 Q. Batching?

3 A. Batching means we would pick up everyday all the
4 letters that came in. If I ran this operation, we would have
5 someone open all these envelopes, pull out the checks, deposit
6 them in the bank, and fill out the receipt form or call and
7 let them know, along with giving them a bank receipt for the
8 amount of money we deposited in their account.

9 If it was an education group, we didn't have to
10 give the people's names.

11 Q. This was a non-political group?

12 A. Conservatives against Liberal Legislation. We did
13 it about a month and it was break-even cost-wise. CALL had
14 been going to a big company that did batching and we thought
15 we could save money for them and expand the services that we
16 offered clients.

17 We realized we were only breaking even or losing
18 money and it took a lot of valuable time and we had to pay for
19 bonding. Sometimes you would have a lot of money that you were
20 dealing with, in checks as well as cash.

21 So, the operation we did was as efficient as we
22 could. Then, when it wasn't profitable, we told them they would

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1 have to find someone else.

2 Q. Were the checks made out to CALL?

3 A. Yes. Shirley and a couple of my staff helped me

4 before New Year's and, then, New Year's Eve and after that,

5 one employee and myself were exclusively involved in doing the

6 batching for CALL.

7 Q. Did anybody at MediAmerica do this for the

8 candidates' committee or the committee to elect Joe Smith or

9 elect, say, multi-candidates, any political candidates; do you

10 recall?

11 A. Not to my knowledge. It was really a pain to do.

12 Q. The National Republican Candidates' Committee was

13 the only committee that you recall MediAmerica employees

14 performing this kind of service, taking the checks out of

15 envelopes?

16 A. Just Shirley. John or Rich may have helped her.

17 I don't know. I remember Shirley doing it because I knew she

18 was responsible for the books for the candidates' committee.

19 Q. Do you know how long it would take her to do

20 something like that?

21 A. Well, I guess when the mail was coming in maybe

22 an hour or two, depending on how much she talked. If she

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stopped and talked to someone in the hall, I don't know.

Q. Was MediAmerica paid for the particular service?

A. I don't know if she got a separate check for that or if it was considered a function of MediAmerica and, therefore, was charged to the committee. It could have been that it was a function of MediAmerica. I don't know how it was set up.

Q. Would these things be set up in a contract?

A. Do you mean a signed contract?

Q. Yes.

A. For the most part there were no contracts with anyone. It was all verbal. They were changing that because they got jilted with the money.

Q. They now will be going to a contract system?

A. If they were smart, they'll have them sign on the dotted line because they had a lot of people that were not paying them.

Q. Political people as well as non-political people?

A. See, I don't know. If it was a phone-bank client, there would be a contract because the cost was exorbitant. You could have a $200,000 situation with the phone bank. It was very, very expensive. So, there were contracts for the phone-bank service.

1 Q. How many contracts were signed for other services?
2 A. I don't think most of them were.
3 (Discussion off the record)
4 Q. Do you have any idea of who the ones were that, say,
5 jilted the committee?
6 A. The committee?
7 Q. Jilted MediAmerica.
8 A. I don't know who ended up finally paying and what
9 arrangements were made for the different ones. Shirley and
10 Rich were the ones that got involved with the finances of it.
11 Q. Did anyone ask you to work for the committee?
12 A. No.
13 Really, it was such a small operation. People
14 envision this huge thing, but it was a little thing that got
15 done by someone.
16 Q. Maybe four or five people in all?
17 A. Shirley, John, Rich, and who else was directly
18 involved? I don't know whether or not you consider answering
19 the phones by the secretary as part of the job, but that would
20 have been probably the only direct involvement of people that
21 I'm aware of.
22 Q. Was anybody asked to work for the committee who

6 3 0 4 0 5 1 3 1

declined to do any work for the committee?

A. Not that I know of.

Q. Was there any pressure -- this is hard to answer, I know -- but any subtle pressure to work for the committee at all?

A. No. It was just a little thing. You are not talking about that many people employed at MediAmerica on the professional level. It was only a handful. Everyone else was non-professional.

Q. When it came down to the operations of the committee, it was basically Rich Geske who was supervisor and people would go to him; is that it?

A. I don't know if it was Rich or John who had the majority of the responsibility for it. When I saw the finished product, I'm not sure Rich wrote it exclusively or if John wrote it and Rich touched it up or John just wrote it.

I saw the letter. I don't remember what it said. I remember thinking it was a good direct-mail piece.

Q. Did you attend any meetings at which the committee was dicussed?

A. No.

(Discussion off the record)

1 MR. LEVIN: I would like to have the reporter mark
2 this exhibit as FEC Exhibit 1.
3 (The document referred to was
4 marked for identification FEC
Exhibit 1, a copy of which is
5 attached to the original copy of
this deposition.)
6 BY MR. LEVIN:
7 Q. And, I'll show you FEC Exhibit 1. Can you identify.
8 that exhibit?
9 A. I have never seen it.
10 Q. You have never seen it?
11 A. No.
12 Q. Just for edification, this appears to be minutes
13 of a first meeting. It was given to us by MediAmerica, and
14 it was, I guess, the minutes of their first meeting as a
15 committee. Did you know at all about this meeting?
16 A. No. But, then, I didn't know about a lot of
17 meetings Rich and John had. They talked for hours and hours
18 and hours everyday.
19 Q. They could have had a meeting in the office and
20 decided to take notes on it?
21 A. Probably what Rich would do, if there were specific
22 things to discuss, he would say we are going to have a meeting.

3 3 0 4 0 5 1 3 3

And, Shirley could have been at it, I suppose. I don't know. He could say we're going to get together at 4:00 and discuss this and, if anyone else showed up, like Rhonda -- she was in there all the time --

Q. Stahlman?

A. Yes.

Q. Rhonda Stahlman would have been included?

A. Could have been. It could have been just John and Rich and Shirley could have been there.

(Discussion off the record)

Q. Do you remember a mailing during September?

A. See, I think that was one of the things I was thinking of. Soon after Shirley got there, this thing happened. If they did another mailing in December, I guess I don't remember this one.

BY MR. MIMS:

Q. You said "this thing happened." What was that?

A. The mailing. I remember one mailing and that was the only thing I remembered.

Q. Is that one of the issues you remember being raised with the courts?

A. For what?

Q. An issue with the courts? The mailing?

A. No. It would have been after the mailing. Then, I would guess, the National Republican Candidates' Committee got phone calls or got inquiries or someone on their committee got one of the direct-mail pieces and called up the committee and told them that this name was going out and they should have it investigated.

I would think that is what happened. I don't know because the committee wasn't that active until the mail piece went out.

BY MR. LEVIN:

Q. Item two: can you read that for me?

A. Lists. JDR will complete 10,000 for first mailing.

I don't know what that swiggle is before the 10,000, but that would have been John Romanin. I don't know whether this was the beginning of a list or, if they acquired a list, a rental list. I don't know.

Q. Now, is this a list of people to request money from in order to pay for the first mailing, item three?

A. Right.

Q. Are they MediAmerica employees or supervisors?

A. John Dolan isn't. Rich is. John is. Rhonda,

she's not.

MR. MIMS: Rhonda K. Stahlman?

THE WITNESS: Rhonda Stahlman. She's not.

These are board people, the Shortleys.

BY MR. LEVIN:

Q. Let's take them one at a time.

John Dolan?

MR. MIMS: Any formal relationship with MediAmerica?

THE WITNESS: I don't know whether he's on the board or not. He would have been involved, but whether or not he's on the board I don't know.

John and Rich were good friends, so a lot of times they would hash things over.

BY MR. LEVIN:

Q. Did you ever hear them discussing anything?

A. John Dolan is so busy. I think he only came to the office five or six times, unless he was helping with the papers or something.

Q. Geske?

A. President.

Q. JDR, Romanin?

A. Rich's assistant.

1 Q. RKS?

2 A. Rhonda K. Stahlman. She was on the board of

3 MediAmerica.

4 Q. Shortleys?

5 A. They have some sort of board function.

6 Q. Maiselle and her husband?

7 A. Both of them would come. I saw them at one --

8 MR. MIMS: That's sufficient.

9 BY MR. LEVIN:

10 Q. And the next one?

11 A. I think the next one, number 6, is the Romanins,

12 but I can't read that writing.

13 Q. Webers?

14 A. That would have been Gail Weber out in California,

15 I guess.

16 Foxborough or Foxbrown: I don't know who that is.

17 And, Carolyn Pollick: that's crossed off.

18 Q. Ken Carpenter?

19 A. No. I don't know who that is.

20 Q. Dave Holland?

21 A. No.

22 Q. Darlene?

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A. I don't know who that is.

I remember hearing some sort of name like Darlene, but it would have been a friend of Richard Jones.

Q. Not an employee?

A. No.

Q. Paul Morantz?

A. No. I don't know who he is.

Q. Dan Snider?

A. Dan Snider: he worked for the management company of our building. I can't think of the management company, but he was like the building supervisor and manager of the company. They were upstairs and he was always bouncing around our office.

Q. General Roberts?

A. General Roberts: I think that's a name -- he was somewhere here in Washington and is a strong conservative. I guess it was someone that he must have known personally to put his name on the list. He wasn't anyone I met or saw.

Q. J. D. Young?

A. I think he was a personal friend of John Romanin's.

T. R. Young: I don't know who that is.

Rudy Real: I don't know who that is.

Mrs. ---

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1 MR. MIMS: Aubry?

2 THE WITNESS: No. I don't know who that is.

3 MR. MIMS: I can't make out the last one either.

4 THE WITNESS: I don't who that is.

5 (Discussion off the record)

6 BY MR. LEVIN:

7 Q. Now, you mentioned before these Urgentgrams.

8 A. Yes.

9 Q. Who thought up this idea of the Urgentgram?

10 A. Rich and John used to collect direct-mail pieces.

11 They were on a lot of different lists to receive things. I

12 think it was a spinoff of something they had seen. I think

13 they are the ones that coined the name of Urgentgram. That may

14 not be true.

15 Q. Was it for a specific mailing for the committee?

16 A. No. It was a MediAmerica mail piece. It was

17 sort of like a cheap way of doing a mailing. You didn't have

18 to have some letterhead.

19 Q. Committee letterhead?

20 A. The client's letterhead.

21 The Urgentgram was an idea they came up with which

22 they thought people would open up quickly, thinking of it in

terms of a telegram, like the spinoff of a telegram.

That way they could print a whole bunch of Urgentgrams and give them to someone cheaper than if they had to print up letterhead. A lot of projects depended on costs and, rather than use your letterhead on this expensive paper for such-and-such cost, we could print up the Urgentgram. So, a lot of the clients used the Urgentgram method.

Q. Was the mailing of the committee the first time you used the Urgentgram?

A. I don't think so. I was trying to think: did my clients ever use it? Mine could have.

Q. You did some mailings, too?

A. When someone said yes to us for money, we would send out a direct-mail piece. Actually, we would send out two. We used it on the phone bank but, whether we used it before the committee did or not, I don't know; I don't remember.

Q. The Urgentgrams were used for other clients? Political clients as well as non-political?

A. Yes.

(Discussion off the record)

Q. Do you know anything regarding the investigation in 1981 by the U. S. Postal Service? You mentioned before about

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1 this possible complaint because of the use of the Urgentgram.

2 A. It was like a telegram.

3 Q. Do you know anything about it?

4 A. It was mentioned that the logo, which was on the

5 Urgentgram, looked a lot like a telegram and the logo, whether

6 it was a patented thing, in MediAmerica it didn't vary enough

7 or something. I don't know what happened to the court case.

8 I know there was something being discussed but,

9 whether the telegram people took them to court or said just

10 don't do it again, I don't know.

11 It was designed very similar to a telegram.

12 BY MR. MIMS:

13 Q. I want to ask you a little follow-up on Gail Weber.

14 Did MediAmerica do any business in California? Did

15 it have an operation or any other company with which it dealt?

16 A. I don't know. They were talking about setting up

17 a company in California and possibly having Gail run it, but

18 I don't know what happened to it.

19 When I was there, to my knowledge, there was nothing

20 functioning out in California that was part of MediAmerica. It

21 doesn't mean there wasn't something but, if there was, I didn't

22 know anything about it. If you wanted to find out, if you

1 didn't know to ask, you didn't know.

2 BY MR. LEVIN:

3 Q What do you know about the incident involving

4 Shirley King when she left as an employee of MediAmerica?

5 She says she talked to you about it.

6 A The incident involving what? Lots of incidents

7 happened.

8 Q This would have involved her reluctance to sign

9 correspondence to the FEC as treasurer.

10 A In late 1981?

11 MR. MIMS: No. Before then. I think around April.

12 THE WITNESS: She left like in September.

13 MR. MIMS: But she had a dispute apparently about

14 signing the documents around April.

15 THE WITNESS: She could have.

16 I was trying to think why she wanted her name off

17 the list. At some point she found out she could get fined, and

18 that's all from what I remember. It was something about the

19 reports submitted and, if they were not submitted on time,

20 there was a fine. Because she was the one signing, she was

21 personally liable for the fines. She wanted her name off and

22 Rich didn't take her name off.

3 3 0 4 0 4 5 1 9 2

I don't know if that's jibing with what she says. I don't know. That's kind of cloudy in my mind.

I know she kept asking Rich to take her name off it because she didn't want to be personally liable for anything that the candidates' committee did that she may not have known about and be held accountable in court for it or for any other reason.

BY MR. LEVIN:

Q So, it was part of that: that she didn't know what she was signing?

A. Well, you look at it when you sign a piece of paper, but it was whether she understood it.

She never dealt in the political world to have any knowledge of whether she understood what she was signing. When she found out later on what the responsibilities were, that may have been when she said: I want off, because I don't want to be responsible for it.

I know she finally came down here to get her name off that list.

BY MR. MIMS:

Q Do you know whether Mr. Geske told her that she was personally liable or was that a conclusion she came to on

her own?

A. I don't know. Rich may not have known the liability involved in anything.

Q. Did either Mr. Geske or Mr. Romanin or anyone else at MediAmerica make any statements that you know of as to whether or not to communicate with the Federal Election Commission with respect to matters pertaining to the committee?

A. Not to my knowledge. He didn't say anything to me. No one came to me in the office and said I can't talk to the FEC. FEC was like something that was never discussed.

BY MR. LEVIN:

Q. No threats were made?

A. No. Rich wouldn't threaten anyone.

Q. Mr. Romanin?

A. Romanin was in another world. He would not threaten anyone either.

(Discussion off the record)

Q. We talked before about a separate phone line being established for the committee. Were there any separate facilities for the committee and was there any kind of co-mingling of facilities or files or anything with other MediAmerican files and facilities?

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1 A. I don't know. I thought they had been assigned a
2 file cabinet. I know they got assigned a desk, and it was in
3 a great big room where there were other files.
4 All the furniture was rearranged, and what happened
5 with things at that time I don't remember. Whether there were
6 four drawers and one drawer was strictly for the candidates'
7 committee, I don't know. I don't imagine their files were
8 much more than that.
9 Q. Did they have a file cabinet with four drawers?
10 A. Shirley was in charge of the files. She would have
11 been the one to know. I know the area was assigned, and like
12 a desk and file. How it got maintained and whether the top
13 drawer was strictly for the candidates' committee, I don't know.
14 Q. That desk was specifically, only, for the committee?
15 A. It was a desk that had a phone on it. I suppose
16 when someone was going to do something for the committee, they
17 could have sat up at that desk, but I don't know whether they
18 did. It was kind of like that desk and the file cabinet.
19 Q. Were there specific instructions that you could not
20 sit down and do anything else but committee business there?
21 A. It would be no one else but Shirley, when she was
22 physically doing their books. Part of the time she was at her

own desk but, if she physically got up and went to that desk when she was working exclusively on their files, you would have to ask her.

Q. Her other desk, she would use that for the other clients, too?

A. She had her own little office. When she was opening up the mail, I remember seeing the mail done at her desk, but I don't know whether any of the work like recording was done there or whether she went to the other desk.

She opened all the mail for the office. You see, at that time, she functioned as the office manager and bookkeeper, and there were flakey secretaries that came in and out and were sick. So, she was responsible for opening all the mail for the office.

The mail for the candidates' committee she would put in one pile but, whether she collected all that stuff and went to the other room, I don't know. She could have.

(Discussion off the record)

MR. LEVIN: We have no further questions.

Thank you very much for coming.

(Thereupon, at 11:21 a.m., the taking of the deposition was concluded.

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(I have read the foregoing pages 3 through 47, inclusive, which contain a correct transcript of the answers by me to the questions therein recorded.)

TERE LINEHAN

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CERTIFICATE OF NOTARY PUBLIC

I, Sandra Vinson, the officer before whom the foregoing deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken by me in shorthand and thereafter reduced to typewriting under my direction; that said deposition is a true record of the testimony given by said witness; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken; and further that I am not a relative or employee of any attorney or counsel employed by the parties thereto, nor financially or otherwise interested in the outcome of the action.

Sandra Vinson

Notary Public in and for
the District of Columbia

My commission expires:
July 14, 1986

(4a)

8 3 0 4 0 4 3 5 1 0 9

First Meeting

400 N. Bennett
Suite 12A

August 18, 1980

- Committee Mailing -

1.A. Initial budget 8,800.00 —

1. Mail date 1st prospect
(A) week of Sept. -

2 lists - IDR will compile
in 10M for first Mailing

3. Lists of people to request
$ from in order the pay for first
Mailing

| | | |
|---|---|---|
| 1) | John Dolan - | 100.00 |
| 2) | Gabe | 50 |
| 3) | IDR | 50 |
| 4) | RKS | 50 |
| 5) | Hartlaps | 100.00 |
| 6) | Romaniu | 100.00 |
| 7) | Weberg - | 100.00 |
| 8) | Foxhoven | 100.00 |
| 9) | ~~Brooks Hollick~~ | ~~100.00~~ |
| 10) | Ken Carpenter | 100.00 |
| 11) | Dave Holland | 100.00 |
| 12. | Darlene | 100.00 |
| 13) | Paul Moranty | 100.00 |
| 14) | Dan Smedley | 25.00 |
| 15) | Glen. Roberts | 25.00 |
| 16) | I.D. Young | 50.00 |
| 17. | T.R. Young | 100.00 |
| 18. | Rudy Deal | 25.00 |
| 19. | Mrs Allen | 25.00 |
| 20. | Clerk + Flex | 150.00 |

FEC Exhibit 1
SV 5-19-82

Q.1.L. Rhonda call 5 people diffuents
for 50-100 - Send wrap!

**Milton Reporting, Inc.**
*General Stenotype Reporting*
(Notary Public: D.C. · Virginia · Maryland)
1601 CONNECTICUT AVENUE, N.W., SUITE #301
WASHINGTON, D.C. 20009
833-3598

**Official Transcript**

FEDERAL ELECTION COMMISSION
Jonathan Levin, Esq.
1325 K Street, N.W. - Suite 700
Washington, D.C.

ORIGINALS FOR FILES

83040435200

**Milton Reporting, Inc.**

*General Stenotype Reporting*

Suite 301
1001 Connecticut Ave., N.W.
Washington, D.C. 20009

R.E. Milton
President
F.R. Joyce
V.P. & General Mgr.

Phone:
202-833-3598
202-833-3599
Notary Public
D.C.-Va.-Md.

June 4, 1982

Tere Linehan
1515 South Jefferson Davis Highway
Arlington, Virginia 22202

Re: NATIONAL REPUBLICAN CANDIDATES' COMMITTEE, MUR 1363

Dear Ms. Linehan:

On behalf of counsel who took your deposition on May 19, 1982, you are hereby notified that the transcript of your deposition is now ready and available at the above address for reading and signing.

As I understood Mr. Levin, he indicated that he would be in touch with you about the reading of it.

Any changes in the transcript should be noted on an errata sheet. The errata sheet should then be signed by you, notarized, and returned to Fred Joyce at the above address.

If you prefer to come to our office for reading and signing, please, contact Mr. Joyce to make arrangements.

If by July 5, 1982, we have not received any request for extension of time or otherwise heard from you, it will be assumed that reading and signing are no longer desired, and the deposition will be filed.

Sincerely,

Sandra Vinson

Sandra Vinson
Reporter/Notary

cc: Mr. Levin
FEC
file

8 3 0 4 0 4 0 5 2 0 1

**Milton Reporting, Inc.**

*General Stenotype Reporting*

Suite 301
1601 Connecticut Ave., N.W.
Washington, D.C. 20009

R.E. Milton
President
F.R. Joyce
V.P. & General Mgr.

Phone:
202-833-3598
202-833-3599

Notary Public
D.C.-Va.-Md.

June 4, 1982

82 JUN 8 P2:04

Tere Linehan
1515 South Jefferson Davis Highway
Arlington, Virginia 22202

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Sincerely,

Sandra Vinson

Sandra Vinson
Reporter/Notary

cc: Mr. Levin
FEC
file

3304052

ORIGINAL

RECEIVED AT THE FEC

82 SEP 13 A11:02

kar

Before the

FEDERAL ELECTION COMMISSION

- - - - - - - - - - - - - - - - - -x

In the Matter of:

NATIONAL REPUBLICAN CANDIDATES' COMMITTEE, et al. : MUR 1363

- - - - - - - - - - - - - - - - - -x

Washington, D. C.

Monday, May 24, 1982

Deposition of

D. RICHARD GESKE

a witness in the above-entitled matter, called for examination by counsel for the Federal Election Commission, pursuant to notice, taken at the offices of the Federal Election Commission, 1325 K Street, N.W., Washington, D. C., beginning at 10:03 a.m., before Karen Hinnenkamp, a Notary Public in and for the District of Columbia, when were present on behalf of the respective parties:

For the Federal Election Commission:

JONATHAN LEVIN, ESQ.
STEPHEN MIMS, ESQ.
1325 K Street, N.W.
Washington, D. C.

1 For the Witness:

2 ROBERT R. SPARKS, JR., ESQ.
Sedam and Herge
3 Suite 1100
8300 Greensboro Drive
4 McLean, Virginia 22102

5 - - -

6 C O N T E N T S

7 EXAMINATION BY COUNSEL FOR:

8

| WITNESS: | FEC (Mr. Levin) | WITNESS (Mr. Sparks) |
|---|---|---|
| D. RICHARD GESKE | 4, 125 | 120 |

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11 - - -

12 E X H I B I T S

13


| Marked for Identification and Attached: | Page |
|---|---|
| Document dated August 18, 1980 FEC Exhibit 1 | 31 |
| Document dated 10/25/80 FEC Exhibit 2 | 43 |
| Documents entitled "Bank Reconciliation" FEC Exhibit 3 | 61 |
| MediAmerica invoices FEC Exhibit 4 | 70 |
| Document dated 12/5/80 FEC Exhibit 5 | 75 |
| Letter dated December 12, 1980 FEC Exhibit 6 | 78 |


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3 3 0 4 0 1 5 2 0 6

1 E X H I B I T S (Continued)

2 Marked for Identification and Attached: Page


3 Letter dated January 21, 1981
FEC Exhibit 7 78

4

Letter dated January 23, 1981
5 FEC Exhibit 8 78

6 Letter dated March 30, 1981
7 FEC Exhibit 9 83

8 Document entitled "Report of Receipts
and Disbursements"
9 FEC Exhibit 10 87

10 Document entitled "1980 Republican
Senatorial Winners"
11 FEC Exhibit 11 90

12 FEC Exhibit 12 106

13 Document entitled "MediAmerica, Inc.,
Financial Statements, December 31, 1979"
14 FEC Exhibit 13 116


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1 Thereupon

2 D. RICHARD GESKE

3 a witness, was called for examination by counsel for the

4 Federal Election Commission and, after having been duly sworn

5 by the Notary, was examined and testified as folows:

6 EXAMINATION BY COUNSEL FOR THE FEDERAL ELECTION COMMISSION

7 BY MR. LEVIN:

8 Q State your name and address for the record, please.

9 A D. Richard Geske. Home address?

10 Q Yes.

11 A 3129 South 14th Street, Arlington, Virginia, 22204.

12 Q Your present occupation?

13 A Manager.

14 Q Of what?

15 A MediAmerica.

16 Q Is there a title to that?

17 A Yes, president.

18 Q Do you have any other connection with MediAmerica?

19 A I own the company.

20 Q Are you the sole owner of the company?

21 A Yes.

22 Q Are you also a director?

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A Yes.

Q Before I go on, I just want to know, did you consult with anybody as to the testimony you are about to give today?

A No, other than --

MR. SPARKS: Counsel.

THE WITNESS: -- counsel. I went down Friday.

BY MR. LEVIN:

Q So you are here represented by counsel?

A Yes.

Q Who is that?

A Mr. Sparks of Sedam and Herge.

Q Could you tell us what your job entails as the president of MediAmerica?

A Yes. I mentioned manager before, basically because I really manage the company, all aspects of the company, from basically, you know, acquisitions, personnel, client involvement, day-to-day management of the company, supervision of the company, right down to sometimes even equipment, having to do with figuring out the problems with the equipment that we have; kind of a total overall. I really manage everything that goes on. That is basically it.

Q So you have final decisionmaking authority?

A Yes. I would say I do, yes. There are some things, however, that because the company is a corporation, obviously I would have to have a Board of Directors meeting or call a Board of Directors meeting or bring it up in order to proceed with it. Such things as indebtedness of the company, you know, securing loans, that sort of thing, would all have to be approved by the bylaws of the company, by the Board of Directors.

Also, you know, I have some dismissals and things of that nature which really require a Board meeting to confirm it or whatever. But other than that, in terms of day-to-day operations of the company, pay this bill, or whatever, you know, check with this, that and the other, absolutely, yes.

MR. SPARKS: Just answer his question, Rich.

THE WITNESS: Shut up? Okay.

BY MR. LEVIN:

Q Would you need a bylaws decision to decide to set up a political committee?

MR. SPARKS: Excuse me; bylaws?

BY MR. LEVIN:

Q I mean, do you need a Board of Directors decision --

1 thank you -- to set up a political committee?

2 A Yes. I would say so, yes.

3 Q Do you know what the National Republican Candidates'

4 Committee is?

5 A Yes.

6 Q What is it?

7 A It is a multi-candidate committee that exists for

8 the purpose of raising funds to help elect Republican candidates.

9 Q When was this committee set up?

10 A I don't know the exact date. I would imagine what,

11 a couple years ago.

12 Q Could you give an approximate date, month or year?

13 A Legally when the actual paper was filed --

14 MR. SPARKS: If you know. If you don't know, say

15 you don't know.

16 THE WITNESS: I really don't know to be exact.

17 I will say a couple of years ago, because this has been a

18 matter kind of dragging on.

19 BY MR. LEVIN:

20 Q Would it have been in 1978?

21 A Oh, no. No. I think that is much, much too early.

22 Q Would it have been in 1980?

0 3 0 4 0 4 5 2 0 5

MR. SPARKS: If you don't know, say so.

THE WITNESS: I really don't know for sure, to give you an exact date.

MR. SPARKS: If you don't know, say so. The records will speak for themselves.

BY MR. LEVIN:

Q Do you recall when they filed the Statement of Organization?

A No, not an exact date.

Q Was the committee in existence before a Statement of Organization was filed?

A No.

Q That marks the beginning point, then, the date that this Statement of Organization was filed?

A Yes. I believe that is true.

Q Were you associated with MediAmerica when this committee was formed?

A Oh, yes.

MR. SPARKS: Would you define "associated with"?

BY MR. LEVIN:

Q Did you hold a position with MediAmerica at that time?

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A Yes. Actually, from my perception, I am an employee of MediAmerica because of its structure. And yes, I was employed at MediAmerica.

Q What were you doing for MediAmerica at that point?

A Manager.

Q Same position you hold today?

A Yes.

Q You were also the controlling shareholder of MediAmerica at that point?

A Yes, I believe so.

Q Whose idea was this committee?

A Mine. My own idea.

Q Did you have discussions with others at the time that this idea came up in your head?

A No, not really. Very, very specifically, there appeared in The Washington Post a major article concerning a piece of legislation that was pretty notoriously known as the Obey-Railsback bill, I believe. The article in The Washington Post, just rereading it that morning, basically the whole thrust of that legislation, as I understood it, was to cut in half all contributions that any candidate, multi-candidate federal committee would be allowed to give.

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It also had some other things about reducing I believe the national committee levels, that sort of thing. I just thought that was outrageous. I thought that was wrong, to be honest with you. I thought at a time when inflation, everything was increasing in price, how could you cut in half the maximum amount of money that a multi-candidate committee could give to a candidate running for federal office. I thought it was wrong. I really did. I was outraged.

MR. SPARKS: Could we have a recess?

MR. LEVIN: Sure.

(Brief recess.)

MR. SPARKS: Mr. Geske, did you have anything else to add to your last answer?

THE WITNESS: No.

MR. LEVIN: Could you read the question prior to Mr. Sparks' question?

(The record was read by the reporter.)

BY MR. LEVIN:

Q Am I to understand that your answer is at the time that the idea came up in your head, you hadn't spoken to anybody just yet or weren't speaking to anybody just yet at that time?

A To be honest, I don't recall. I am sure -- the Washington Post article really was the thing that brought my attention to the whole idea of a multi-candidate committee.

Q Would this have been about the spring of 1980?

A I don't really recall. I really don't recall.

Q Shortly thereafter, after the idea came in your head, did you begin to discuss this idea with anyone else, such as Mr. Romanin?

A Yes, I did. Yes. I probably discussed it at that point with several people.

Q Who else would you have discussed it with?

A Romanin would have been an individual.

MR. SPARKS: What is the purpose of asking who else he talked to? What does that have to do with anything?

MR. LEVIN: I think it is relevant to the formation of the committee.

MR. SPARKS: I understand you feel it is relevant, but can you say why?

MR. LEVIN: Because we want to know who was involved in the committee, whether they were MediAmerica people.

MR. SPARKS: The filings speak for themselves. You know who was involved.

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1 MR. LEVIN: The filings merely state certain things
2 that may have been recalled at the time.
3 MR. SPARKS: If you would like to know who was
4 a member of the committee, ask that, please.
5 MR. LEVIN: Beyond who was a member of the committee,
6 I believe it is relevant to see who was in on the formation
7 who may not have been a named member. of the committee.
8 MR. SPARKS: Why is that relevant?
9 MR. LEVIN: Because as you know, we are trying
10 to see what kind of connection there was with MediAmerica.
11 Let's be up front about that.
12 MR. SPARKS: Why don't you ask if any other members
13 of MediAmerica were part of the committee or who was part
14 of the committee?
15 BY MR. LEVIN:
16 Q Answer that question then. Who was a part of those
17 discussions, those preliminary discussions?
18 MR. SPARKS: Who were also members of MediAmerica,
19 is that the question?
20 MR. LEVIN: Well, I don't want to confine it to
21 members of MediAmerica. I will explore as to what their
22 association was with MediAmerica more specifically after

that. I believe if I find out who they were, then I can ask specific questions as to those people.

MR. SPARKS: So what is the question?

BY MR. LEVIN:

Q The question was, you said that you had discussions with Mr. Romanin and with several other people. Who were those several other people?

A I think I bounced the idea -- well, I know I bounced the idea off Rhonda Stahlman, but I don't know when exactly, probably somewhere in that time period. I bounced the idea off of John Dolan, Terry Dolan. Who else?

MR. SPARKS: Who else?

THE WITNESS: Probably Mike Weber, a personal friend that lives out in California. Those are the only names that really come to mind.

BY MR. LEVIN:

Q What was Rhonda Stahlman's connection with MediAmerica, if any?

A Oh, at that time? She may have been on my Board.

Q The Board of Directors?

A Directors of the company, yes. Yes, I think she was. Yes. But I think it is pretty important to make a

1 discrimination between that individual or any other individual
2 in their capacity as a Board member, I think, and in their
3 capacity as a personal friend.
4 MR. SPARKS: Just answer the question, okay? I
5 know what you are talking about. I know what you mean.
6 BY MR. LEVIN:
7 Q What kind of distinction are you talking about?
8 A Well, one is a business relationship. One is a
9 personal friendship.
10 Q What was this relationship? Was it business or --
11 A Oh, absolutely personal, totally.
12 Q How about Terry Dolan? What was his connection
13 with MediAmerica, if any?
14 A None that I know of.
15 MR. SPARKS: That is it. You answered it.
16 BY MR. LEVIN:
17 Q How about Mike Weber? What was his connection?
18 A None.
19 Q No connection with MediAmerica?
20 A No.
21 Q Do any other names come to mind that you might
22 have talked to about it?

A I may have called Curt Herge and asked him a couple questions about it or bounced the idea off of him, but again I don't really remember.

Q In what capacity was Mr. Herge acting at this point when you called him?

A I don't know. I didn't receive a bill for it or anything.

MR. SPARKS: Do you recall talking to Curt Herge?

THE WITNESS: I could have.

MR. SPARKS: Could we go off the record again?

MR. LEVIN: Sure.

(Brief recess.)

MR. LEVIN: Back on the record.

MR. SPARKS: Mr. Geske, at the time we went off the record, you were in the process of answering a question about whether or not -- there wasn't a question. You were in the process of saying whether or not you may have talked to Curt Herge. Do you have anything further to say on the subject?

THE WITNESS: No, I don't.

MR. SPARKS: Do you recall whether or not you talked to Curt Herge?

THE WITNESS: No, not really.

MR. SPARKS: You did not or you do not recall?

THE WITNESS: I really don't recall if I did.

MR. SPARKS: Okay.

BY MR. LEVIN:

Q Those conversations that you did have with Mr. Romanin, Miss Stahlman, Mr. Dolan, Mr. Weber, can you recall the content of those conversations?

A Not specifically, no.

Q Well, what generally did you talk about?

A "What do you think of this as an idea to help raise money for Republicans?"

Q Did anybody say that this was not a good idea or give you any kind of response that was not positive as to this idea?

A No.

Q Did they all say go ahead and do this?

A As I recall, yes.

Q Did anybody warn you about any possible pitfalls in doing this, anything that could have been legal, financial?

A No.

Q So basically you say you got a positive reaction

1 to this?

2 A Oh, yeah.

3 Q Did this encourage you to go ahead and form a

4 committee?

5 A I would have to say that, you know, I wasn't too

6 much influenced by them, so it wasn't all that encouraging.

7 I mean, they are not the cause of yes, I want to do this.

8 Q At this point you had made the decision to go ahead

9 and form the committee then?

10 A I don't know if I really had or not, but I may

11 have. Again, we are dealing with a period that seems to

12 be to me years ago.

13 Q What finally made you decide then?

14 A I have to say the article in The Washington Post.

15 Q So you had been thinking about it before that article,

16 forming the committee before that article?

17 A Not specifically. Not that I recall anyway.

18 Q Well, let me ask one more question on this. I

19 am just a little confused, frankly --

20 A I am, too.

21 Q -- in terms of you say you had not made the decision.

22 At what point did you make the decision?

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A Oh, geez, I don't really know.

Q When you finally did set up the committee, who was involved in setting it up?

A I would say myself. Oh, Karen Dent may have. I requested forms from the FEC and basically said these forms have to be filled out.

Q Who is Karen Dent?

A Karen Dent was an employee of MediAmerica.

Q What did she do for MediAmerica?

A She was the bookkeeper.

Q When you asked her to get these forms, did you ask her to do this on work time?

A I don't recall. I don't recall specifically.

MR. SPARKS: You have answered it, unless you do recall.

THE WITNESS: I don't really.

BY MR. LEVIN:

Q Did you ask her to do it at the workplace, at the MediAmerica offices?

A I don't remember designating any place to do it.

Q Just describe more specifically what Miss Dent did. You said she was a bookkeeper. What did that entail?

A She was responsible as an employee of MediAmerica to do the accounts receivable, the accounts payable, prepare payroll.

Q Why did you ask her to do this?

A Because I asked her if she was interested in becoming involved in the committee.

Q What did she say?

A She said yes.

Q So it was after you asked that question, she said yes, and then you said, "Would you do this for me?"

A I assume so, yes.

MR. SPARKS: If you don't know, say so.

THE WITNESS: I don't know for sure. Okay? It is three years ago, or whatever. I really don't know.

MR. SPARKS: Okay. Then is your answer that you don't recall?

THE WITNESS: I think that is the best answer, yes.

BY MR. LEVIN:

Q These other discussions you had before, where did you have those discussions? Did you have them at work, at MediAmerica offices?

A Before what?

Q Those discussions with Dolan, with Weber, with Romanin, with Stahlman.

MR. SPARKS: Do you remember?

THE WITNESS: Yeah. I guess if I had to say, I don't really remember. I could have had them at my home.

BY MR. LEVIN:

Q It could have been at work or at home?

A I don't really recall where I had them. It could have been in person. I don't know.

MR. SPARKS: You don't remember, okay.

THE WITNESS: That is the best answer, I guess.

BY MR. LEVIN:

Q Who else did you ask to be part of the committee?

A At that time, I think that was it. John Romanin.

Q You asked Mr. Romanin.

A And Karen Dent, I believe.

Q How about Shirley King? Did you ask her?

A Oh, much later, yes.

Q Did you ask other people at MediAmerica to be part of the committee?

A No, I don't think so.

Q How did you phrase it when you asked Mr. Romanin to be part of the committee?

A I don't really know. I really -- I don't know.

MR. SPARKS: Excuse me. Have we identified who Romanin is and what relationship he has?

MR. LEVIN: Let's do that.

BY MR. LEVIN:

Q Who is John Romanin?

A John Romanin is -- was a personal friend of mine and he was also an employer -- employee, rather, of my company.

Q What did he do as an employee of MediAmerica?

A He was an assistant to me, responsible for follow-ups, collecting information on equipment acquisitions, some client contact, following through with requests that I had made concerning a specific client or an order for equipment or supplies or something of that nature.

Q So how much contact did you have with Mr. Romanin on a day-to-day basis at MediAmerica?

A Oh, unless I was out of the office, I would see John every day.

Q How about Miss Dent?

A Whenever she was there, I would see her I think

almost every day.

Q So we have a point at which you decided to set up this committee. What did you tell Mr. Romanin to do at this point?

A I don't think I necessarily told him to do anything. I believe I asked him if he was interested in joining in this effort.

Q What did he say?

A He said yes.

Q Did he express any doubts about the effort, either the feasibility of the committee or the legality of the committee?

A No. I don't recall ever hearing any, no.

Q So you would say he was a willful participant, a willing participant?

A Oh, absolutely, yes.

MR. SPARKS: Do you want to call him a knowing participant, too?

MR. LEVIN: No. As a matter of fact, that didn't even enter my mind, to be perfectly frank with you. It did not enter my mind.

BY MR. LEVIN:

Q Did you ask anybody outside of MediAmerica to participate in setting up the committee?

A I don't really recall, but with one exception. I may have made a slew of calls basically to just friends.

Q Did you want these friends to participate as officers or to contribute? What was the purpose of these calls?

A Oh, to find out if they were interested in doing something politically and to contribute, yes, I think.

Q So it could have been either as an officer or worker or someone giving money to the committee?

A Yes. I think that is fair.

Q These discussions on the phone, these phone calls, were they made at work?

A What discussions?

Q To your friends.

A Oh, I see. I am sure some of them were. I am sure some of them were not.

Q Let me just go --

A Again, if I am going to be fair, I am going to have to say I don't really remember where I talked to people or when I talked to people. It could have been over dinner.

I just don't -- you are asking me to tie something down that in all honesty I really don't know where --

Q You don't recall sitting in your office and talking on the phone to these people?

A Not specifically, no.

Q How about Mr. Romanin? Do you recall sitting in your office and talking to Mr. Romanin about this committee --

A Yes, I do recall.

Q -- during work?

A As a matter of fact, I know it was quite late in the evening, after work.

Q Was that a conscious decision on your part to do it after work?

A Oh, absolutely.

Q You say that you asked Miss Dent to get FEC forms. What did you do next to try to set up this committee?

A Well, again to be honest with you, I am not sure if I even asked her. I may have gotten all of those forms myself. I am not really sure if I did that.

In any event, the forms were acquired, and I asked her if she wanted to be involved in the committee as a treasurer.

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1 Q What did she say?

2 A She said yes.

3 Q What if she had said no?

4 A Then I would have had to find somebody else who

5 was interested.

6 Q Did you ask anybody at MediAmerica to participate

7 who then said that, "No, I really rather not"?

8 A Could you repeat that question?

9 Q Did you ask anybody at MediAmerica to participate

10 who then said, "Well, really no, I would rather not"?

11 A I think so. Tere Linehan was an employee and --

12 MR. SPARKS: Spell the last name.

13 THE WITNESS: L-i-n-e-h-a-n. -- and she said no.

14 Fine.

15 BY MR. LEVIN:

16 Q Did she give a reason why?

17 A Not that I recall, except that she was more into

18 nonprofit associations, like the Heart Association, not so

19 politically interested.

20 Q How did you intend to run this committee? I mean,

21 how did you intend to direct this committee?

22 A It was my idea that the committee would be set

1 up with as little overhead expenses as could be allowed.
2 The whole idea there was if you don't have a great big staff
3 budget and blah, blah, blah, then more of the funds you collect
4 will go to candidates. So that was really kind of the whole
5 idea.
6 Q How did you intend to accomplish this low overhead?
7 A Oh, what I did was sublet space. My company rented
8 space to the Candidates' Committee.
9 Q Did you try to find space anywhere else?
10 A Yes. I do remember making several calls, but it
11 was, you know, very expensive to rent a whole suite of offices
12 or even one small separate suite. All it required was a
13 very small space. There were basically no employees to the
14 committee; part-time people only working on it.
15 Q So it was only after you found out that you couldn't
16 pay those prices that you decided to have facilities at
17 MediAmerica?
18 A It is just that they were too expensive, and I
19 know again for the size I couldn't find anything that small
20 to warrant the amount of money that I thought should be paid
21 for rent.
22 Q Did Mr. Romanin ever express any question as to

1 the idea of MediAmerica giving facilities to the committee,
2 or renting facilities to the committee, or the other way
3 around?
4 MR. SPARKS: I am sorry; I got lost in the question.
5 MR. LEVIN: Okay. Let me rephrase that and make
6 it more clear. You are right.
7 BY MR. LEVIN:
8 Q Did Mr. Romanin express any question as to the
9 relationship of MediAmerica and the committee, the idea of
10 the use of the facilities within the same perimeter anyway
11 or the use of the same personnel? Did he say, "Now wait
12 a minute. You ought to think twice about this"?
13 A Not that I recall really.
14 Q So you recall no question about that at the time
15 of formation at all?
16 A No, not really.
17 Q Did you decide at the outset that you would be
18 the one running the affairs of the committee?
19 A No, not really at all. It was my hope that as
20 soon as the committee was able, it would hire its executive
21 director who would then run the committee when that was needed,
22 but that the people involved at this stage would do so on,

1 you know, a part-time basis. And in fact it was almost nothing
2 in terms of involvement, time, that sort of thing. So I
3 didn't see the necessity of trying to hire an executive director
4 before. I really didn't.
5 Q Would this have been a director from outside of
6 MediAmerica?
7 A Anybody who was interested in doing it and met
8 the qualifications.
9 Q So it could have been from within MediAmerica?
10 A It could have been anywhere. Anybody who was qualified
11 who really wanted to do it.
12 Q How about you? Did you think ultimately you would
13 really have to do that?
14 A No. I never thought of that.
15 Q Would you consider yourself to have been the temporary
16 political director at that point?
17 A No.
18 Q Then who was making the decisions for the committee?
19 A Oh, I made the majority of the decisions for the
20 committee. But a political director is kind of like a specific
21 job title where that person would be involved, I would assume,
22 with making contact with candidates and that sort of thing

1 or, you know, finding out poll information. So as a political
2 director, no. That is a specific job title. And in fact
3 that kind of activity wasn't even necessary, to the best
4 of my knowledge. Again, it was a brand new committee.
5 Q Why was this committee formed? Or let me put it
6 this way. You had a number of conservative groups that were
7 your clients. Why did you think you needed another group?
8 A For the exact reasons I stated earlier. I believe
9 that there should be as many groups as possible who are engaged
10 in the political process, quite frankly, raising money and
11 giving it to the candidates of their choice, or whatever.
12 Q We have already established why the committee would
13 have space within the perimeters of the offices of MediAmerica.
14 That was the low overhead.
15 A Yes.
16 Q Why did you choose MediAmerica to perform services
17 for the committee?
18 A My company is a direct mail company. I honestly
19 believe that my company provides the best service at the
20 most competitive prices.
21 Q Did you check that out?
22 A Oh, yes, sure. We very routinely, very routinely for

8 3 0 4 0 4 5 2 3 1

our clients provide cost comparisons or estimates and that sort of thing.

Q Well, did you call other direct mail groups and see if they would do services for MediAmerica?

A At that time --

MR. SPARKS: Excuse me. MediAmerica?

MR. LEVIN: For the committee; I am sorry.

THE WITNESS: No. No, I don't -- no, I did not.

BY MR. LEVIN:

Q So you just made the decision that MediAmerica would provide the services.

A Well, as an employee of MediAmerica who provides direct mail services, I am very much aware of what competing companies charge for various kinds of services. And I would wager to say then, as now, our prices are as competitive or more reasonable than other companies providing the same service to a client.

MR. LEVIN: I am asking the reporter to mark this as FEC Exhibit No. 1.

(The document dated August 18, 1980 was marked FEC Exhibit 1 for identification, a copy of which is attached to the court copy of this deposition.)

3 3 0 4 0 5 2 5 1 2

MR. LEVIN: I am showing FEC Exhibit No. 1 to the witness and counsel for the witness.

THE WITNESS: Oh, this is --

MR. SPARKS: Wait.

(Witness and counsel conferring.)

MR. SPARKS: Do you have a question about this?

BY MR. LEVIN:

Q Can you identify this document?

A Yes.

Q What is it? What is this document? FEC Exhibit 1, for the record.

A This is my notes on a meeting that John Romanin and myself had in my office after business hours concerning, you know, how do we do this? How do we raise the initial -- how do we get the Candidates' Committee going? How do we raise the initial money? What we basically said is okay, we think we need about this much money.

Q That is item 1(A)?

A Yes, from the looks of it here, as I recall. When should we put this out? Approximately that time. What list? John said, "Oh, I will put together some lists." And then it was well, okay, we need whatever contributions we can

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1 get to open up a bank account and whatnot, to get the committee
2 going once it is filed, once things are filed. And it looks
3 we said well, let's ask all of our friends and have our friends
4 ask their friends if they are interested in contributing
5 to a political committee; and, if so, how much.
6 Q That date in the upper right-hand corner, does
7 that refresh your recollection as to what time frame we have
8 been talking about as to when you first thought of this
9 committee?
10 A Not really. But I do remember that day or that
11 evening sitting there in my office. But what else was going
12 on in the world, I don't really recall.
13 Q When you referred to the compiling of the list,
14 is that item 2 there, "Lists," and then Romanin?
15 A Yes.
16 Q Where did he propose to get 10,000 names from?
17 A I don't remember him saying so, saying where.
18 Q Did he say that he could have gotten it from
19 MediAmerica's lists that it used for other clients?
20 A I don't really recall that. I don't really recall
21 that.
22 Q Do you know if he had a list of his own? Does

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1 that ring a bell?

2 A He did keep a personal list, yes.

3 Q How would he have gotten that list?

4 A I don't know. That I don't know.

5 Q But would that have been a part of his business

6 function to keep a list?

7 A No. That was a very personal list, as I recall,

8 basically people contributors and that sort of thing.

9 Q Did he get those off of other client lists?

10 A I don't really know where he compiled those names

11 from.

12 Q You say it is his personal list. Did he himself

13 compile the names?

14 A Yes. I assume he did, yes.

15 Q Did he propose to purchase a list from other clients?

16 A I don't really recall.

17 Q How about another mailing house?

18 A Again, I don't really recall. I think it is kind

19 of important to kind of -- as I recall that meeting, it was

20 kind of a wham-bam type of meeting. It was not, you know,

21 detailed strategy of this. Let's just put some ideas down

22 and see where we can go with things.

Q This is your handwriting?

A Yes, it is. I took notes at the meeting. Except for some of these things here.

MR. SPARKS: Which things are you referring to?

THE WITNESS: There are some -- it looks like there is some handwriting in parenthesis which is not mine. At least I don't recognize it as mine.

MR. LEVIN: Let me say for the record that those notes that you do not recognize, in handwriting other than yours, are notes we have actually put on the document. In order to qualify this document, we want to say that those are not part of the document and should not be considered.

MR. SPARKS: That is fine. Which notations are those that are yours?

MR. LEVIN: Let's then say specifically what they are.

MR. SPARKS: Would it be "4d" up at the top in a circle?

MR. MIMS: No. I believe that was on yours when it was submitted.

MR. LEVIN: Item 3, the word that is circled and underlined is the FEC's notation on the document.

9 3 0 4 0 4 5 2 3 6

THE WITNESS: What is item 3?

Okay.

MR. LEVIN: Item 3, number 7, "Gail" is our notation. "California" in parenthesis is our notation. Item 14, "building management" in parenthesis is our notation. Item 16, "Romanin's friend" in parenthesis is our notation.

MR. SPARKS: Mr. Geske, other than those notations, are all other writings on the paper yours?

THE WITNESS: Yes; except for this.

MR. SPARKS: Except for "FEC Ex. 1" with a date.

THE WITNESS: Yes.

BY MR. LEVIN:

Q So when you did use a list for the first mailing, what list did you use?

A It was the list that was compiled by Romanin.

Q Do you know where he got those names from?

A I don't really recall asking him. That was his -- it looks like that was his job. He was going to get together our first names.

Q Did he get a list of 10,000 names?

A I don't know if he got 10,000 or 100,000. I really don't recall or actually know, to be exact.

3 3 0 4 0 5 2 3 7

1 Q I am going to go down this list of names here that
2 you have in front of you. If I get the name wrong and you
3 can correct me, please do. I would like you to tell me what
4 connection they did have, if any, with MediAmerica or with
5 the committee, with the National Republican Candidates'
6 Committee.
7 John Dolan.
8 A What would you like me to say now? I am sorry.
9 Q What connection, if any, they had with MediAmerica
10 and/or with the committee.
11 A At the time, I don't think any.
12 MR. SPARKS: Fine. None?
13 THE WITNESS: None.
14 BY MR. LEVIN:
15 Q Does he have a connection now?
16 A Unless he is a contributor, no.
17 Q Number two is I assume you.
18 A Yes, that is me.
19 Q Number three, is that Mr. Romanin?
20 A Yes. JDR, yes.
21 Q And number four?
22 A It could have been Rhonda Kay Stahlman.

8 3 0 4 0 4 5 2 3 8

Q Any connection there?

A I don't know for sure. I really don't know for sure.

Q You said before she was a director.

A Yeah. Well, I was thinking maybe she was and maybe she wasn't, because she was resigning left and right. I never knew when she was on and when she wasn't.

Q Number five, the Shortleys?

A Contributor only, Bob Shortley.

Q How about Maizel Shortley?

A Maizel Shortley I believe at that time was a Board member.

Q Did she hold any employee position?

A No.

Q Did you have any discussions with her as to the formation of the committee?

A No, I don't think so. I really don't think so. But I do remember calling Bob and saying --

MR. SPARKS: Bob who?

THE WITNESS: Bob Shortley. -- and saying, "Bob, it is a good idea, I think, and what do you think, and would you like to contribute?" He said, "Sure."

BY MR. LEVIN:

Q When was this call?

A I don't really remember.

Q Would it have been after this meeting?

A I would say it would have been, yeah. But again, I don't really know when exactly.

Q Could it have been at the time when you were first thinking of forming the committee?

A I really don't know.

Q Did Maizel Shortley do any work for the committee at any point?

A Not that I really know. I don't think so.

Q Number six, is that the Romanins?

A Yes.

Q This is apart from John D. Romanin?

A Yes. I think that was meant to be like his mother, his father, his sister, brother, that sort of thing; his family, I guess.

Q Did they have any association with the committee or the company?

A No, none whatsoever; other than being a potential contributor or being involved in it in some way or another.

Q How about the Webers?

A No, not that I know of at all.

Q Number eight, what is that?

A Foxhoven. Foxhoven is a personal friend of mine.

Q Any connection with either the committee or the company?

A None whatsoever, that I know of anyway. When I say none whatsoever, I am not really sure if Mike did send $100. If he did, I assume you mean that would be a connection to the committee as a contributor.

MR. SPARKS: Are you interested in knowing whether these were contributors or any other way?

MR. LEVIN: Let's clarify. Let's exclude for the purpose of this whether or not they actually contributed.

MR. SPARKS: All right. So in short, whether they were officers or directors or employees of either MediAmerica or NCC?

MR. LEVIN: Correct.

BY MR. LEVIN:

Q Number nine?

A I don't know who number nine is.

Q Number ten?

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1 A That is a personal friend of John Romanin.

2 Q Ken Carpenter.

3 MR. SPARKS: Is he connected with the committee?

4 THE WITNESS: No, not in any way.

5 BY MR. LEVIN:

6 Q Number eleven?

7 A I believe that is also a personal friend of John

8 Romanin, and no, there is no connection.

9 Q Is that Dave Holland? Is that the name?

10 A Yes.

11 Q Number twelve, Darlene?

12 A That is a personal friend of mine, and there is

13 no connection.

14 Q Number thirteen?

15 A Actually, Darlene is my sister. I say personal

16 friend. She is my sister. There is no connection.

17 Q Number thirteen?

18 A Paul is a personal friend of mine.

19 Q Paul Morantz?

20 A Yes. And there is no connection whatsoever.

21 Q Number fourteen?

22 A No, they are not connected. That person isn't

0 3 0 4 0 4 5 2 4 3

connected.

Q Number fifteen, General Roberts?

A No, not connected at all.

Q Number sixteen, J. D. Young?

A No, not connected at all.

Q I can't read number seventeen.

A It looks like T. R. Young, and no, not that I know of at all.

Q Number eighteen, Rudy Real?

A I don't even know who the person is. There is no connection that I know of whatsoever.

Q Number nineteen?

A I don't know who Mrs. Aubry is either. I don't think there is any connection whatsoever.

Q Number twenty?

A No connection whatsoever.

Q If I have to go back to that document, I will specifically refer to it, but for right now I don't think we will need it.

When was the first mailing made?

A I don't really know. I don't really recall the date.

Q Do you recall the form of that first mailing?

MR. SPARKS: If you know, why don't you show it to him and ask him if that is it?

MR. MIMS: We are not sure.

THE WITNESS: No, I don't recall the form of the first mailing.

MR. LEVIN: I am asking the reporter to mark this as FEC Exhibit No. 2.

(The document dated 10/25/80 was marked FEC Exhibit 2 for identification, a copy of which is attached to the court copy of this deposition.)

MR. LEVIN: We are showing FEC Exhibit No. 2 to Mr. Geske and counsel.

MR. SPARKS: What is your question?

BY MR. LEVIN:

Q Can you identify FEC Exhibit No. 2?

A Yes. That is a direct mail piece that was written and designed by me for the client, the Candidates' Committee.

Q Was this the first mailing?

A That I don't really know. I believe there were two or three mailings, and I am not really sure. I don't know what order they came in or whatever. I really don't know.

8 3 0 4 0 4 0 5 2 4 4

Q Would that have been two or three total mailings or preceding this one?

A Oh, geez, I don't know. I really don't know.

MR. SPARKS: I am sorry; I am getting lost now.

MR. LEVIN: He said two or three mailings. I was wondering two or three up to this point or two or three total mailings by the committee.

THE WITNESS: I see. I think there were two or three total mailings. But when they occurred, I don't really know.

BY MR. LEVIN:

Q This date up on top, October 25th, does that refresh your recollection at all as to when? I mean, would you have made another mailing before then?

A I don't really know, to be exact.

Q How did you finance this mailing?

A I believe that there were some contributions made to the committee, and as a client of MediAmerica, MediAmerica undertook the project to do mailings, what is known as prospect mailings.

Q Who did the soliciting for these contributions? Did MediAmerica do that? Did committee personnel do that?

A I don't know if I really understand the question.

Q I am unclear as to whether --

A The committee in my mind hired, retained MediAmerica as a vendor. "We need to have X, Y and Z done. We are retaining you. Do it."

Q When do you first recall the receipt of contributions from a mailing?

A As for almost any client, receipts begin coming in within -- depending upon postage that was used, it will probably begin coming in anywhere from five to fourteen days, depending upon any direct mail variables, the amount of postage carried going out, the actual time that it was mailed, the date that it was mailed, whether or not there were holidays, all of those variables that come into play to more or less give an idea of when returns would start coming in. When returns came in for this mailing or any other mailing for this client or for any other client, I am not really absolutely sure. I couldn't say when it is this came in.

Q Do you recall actually the receipt in the time period when you ere receiving contributions from this mailing? Would that date remind you of anything, say early November?

A No, not really.

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1 Q When the checks would come in, do you recall in what
2 amounts they came in?
3 A No, I don't.
4 Q Do you recall if there were any checks for over
5 $100?
6 A No, I don't. I am sure there may have been, but
7 I don't really recall.
8 MR. SPARKS: Do you recall? If you don't recall,
9 you don't recall.
10 BY MR. LEVIN:
11 Q Do you recall any over $200?
12 A No.
13 Q I mean that strike you.
14 A No.
15 Q Do you recall anything really large? Do you remember
16 anything like $1,000?
17 A No.
18 Q When these checks came in, how were they processed?
19 What was the process that the committee would go through
20 or that MediAmerica would go through?
21 A Keeping in mind that the committee was a client
22 to MediAmerica, and I think that is very important to keep

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1 in mind -- I certainly was aware of that -- that the committee
2 retained services for caging and batching. That would be
3 processing returns. And whenever those came in, they would
4 have been put into some sort of order, opened, recorded,
5 deposited, that sort of thing.
6 MR. SPARKS: Who would have done that?
7 THE WITNESS: I don't recall who specifically did
8 that, although --
9 MR. SPARKS: Excuse me. I am asking because your
10 question was did NCC or did MediAmerica do it, was it not?
11 MR. LEVIN: Right. Well, that is part of the question.
12 THE WITNESS: Oh, I see. Well, in my opinion,
13 as a vendor, we were supplying the service --
14 MR. SPARKS: Who is "we"?
15 THE WITNESS: We, MediAmerica, specifically as
16 a company in direct mail, was supplying a service of opening
17 responses, duly recording them, and making deposits, that
18 sort of thing.
19 BY MR. LEVIN:
20 Q Did Shirley King do that specifically, the person?
21 A She may have, yes. She, and I would imagine anybody
22 that she designated.

Q Who else would have done that or did do that?

A I don't know.

(Witness and counsel conferring.)

THE WITNESS: Whoever did it and was responsible for the caging and batching process, I do know that personnel time was compiled so that that would be charged to the client as a service. I don't remember the exact people, whowever was involved in it.

MR. SPARKS: Was it charged?

THE WITNESS: Yes. It was definitely --

MR. LEVIN: I will ask either in the form of a question for the record or I will have to say there has been consultation off the record.

MR. SPARKS: Fine. Say there is consultation off the record.

(Witness and counsel conferring.)

BY MR. LEVIN:

Q When Shirley King did this, who paid her? Did MediAmerica pay her? Did the committee pay her?

A Whoever was involved in it was involved with it at that point as an employee of MediAmerica fulfilling a service to a client. The time that any personnel or employees

spent on it was compiled or should have been compiled by Mrs. King or whomever so that an invoice could be made up and billed to the committee. In fact, I know, because I saw an invoice for that when I was reviewing some things, that it was invoiced as a service to a client invoice.

Q Did Shirley King do caging and batching for other committees that were clients of MediAmerica?

A Yes, I believe she did.

Q This was a regular part of her job?

A No, no. It was not a regular part of her job.

Q Who did it regularly?

A It was not a full-service type of thing that the company did. We would do it on request of any client.

Q How many other clients did you do that kind of thing for, caging and batching?

A We basically did tests for them, and I think there may have been a couple of other people.

Q What do you mean by tests?

A Well, to find out if caging and batching as a full service was something that we wanted to offer as a company to all clients versus just when a client would request, "Do you have that service? Okay. Well, we will do our best to

1 serve you. Therefore, we will do whatever it takes to serve
2 you."
3 Q Is this the first time you did that not as a test,
4 though; you did this as part of the services?
5 A Yes.
6 Q It wasn't a test?
7 A No. Not on this at all, no. The service needed
8 to be done. I would just make the assumption that any company
9 that was concerned with caging and batching as a form of
10 business would have just laughed at this as a potential client.
11 So again, a start-up client is not going to have a lot of
12 work to do and they probably would have laughed at it, to
13 be honest with you, and not get the service. That was certainly
14 my opinion. So somebody had to do it.
15 Q What do you mean by laughed at it?
16 A Well, a new client starting up is just not going
17 to have any work to speak of.
18 MR. SPARKS: What do you mean when you say work?
19 THE WITNESS: Work in terms of caging and batching.
20 Whenever you are involved with a brand new client that starts
21 up, the initial, you know, I would say the first year --
22 again, it depends on how you advise the client or what you

do specifically for the client, but basically the first year does not involve a lot of caging and batching work. Frequently it is so minimal that it is done by, you know, a secretary or anybody.

BY MR. LEVIN:

Q So other companies wouldn't have done this kind of service then?

A My feeling is that they would not have been interested in the Candidates' Committee as a client because there would be no volume.

MR. SPARKS: Off the record again, please?

MR. LEVIN: Sure.

(Brief recess.)

MR. LEVIN: Back on the record.

MR. SPARKS: Is there a pending question? I didn't mean to interrupt. Go ahead.

MR. LEVIN: Could you read back the last question and answer, please.

(The record was read by the reporter.)

BY MR. LEVIN:

Q You said that Shirley King may have done the caging and batching.

A Yes.

Q She was with the committee?

A Again, there is a difference. Yes, she was with the committee, but in that case she was acting as an employee of MediAmerica providing a service.

Q But whenever she did work outside of her status as an employee of MediAmerica, you might also call her a volunteer for the committee? Not an officer or anything like that, but she was treasurer. As a treasurer for the committee, she was in a volunteer capacity; is that correct?

A Yes.

Q If she was a volunteer for the committee --

MR. SPARKS: Excuse me. When you say volunteer, do you mean unpaid officer?

MR. LEVIN: Unpaid officer.

MR. SPARKS: All right.

BY MR. LEVIN:

Q -- why did she then do work which was charged to the committee on MediAmerica time? Why didn't she just do it on her own time as a volunteer?

A If she did work as an employee of the company for a client, then that has got to be different. Then that is --

1 you must charge for that.

2 Q Couldn't the committee have saved money by saying,

3 "Shirley, why don't you do the caging and batching --

4 MediAmerica has performed the service of sending out the

5 mailings and taking them in. Why don't you have MediAmerica

6 turn them over to you and sometime around 7:00 in the evening

7 you could sit down and do caging and batching for the committee"?

8 MR. SPARKS: The answer to that is as we have said

9 in our papers.

10 MR. LEVIN: I am interested in Mr. Geske's answer.

11 MR. SPARKS: I understand that. But you are asking

12 the same question in 18 different forms. I will tell you

13 again what has been answered before. That is what could

14 have been done and it was not. There is no prohibition in

15 the law for a committee hiring an outfit like MediAmerica

16 to do it for them, period.

17 MR. LEVIN: I would like to know why a decision

18 was made to do it that way.

19 MR. SPARKS: How is that relevant if it doesn't

20 violate the law, or do you contend that it does?

21 MR. LEVIN: I don't think each question has to

22 go to a conclusion this activity does, this activity doesn't.

1 If there is a course of conduct that either indicates it
2 does or it doesn't, that is inculpatory or exculpatory, then
3 I think that is a relevant question.
4 MR. SPARKS: What is your question?
5 MR. LEVIN: My question is exactly, what decision
6 was made as to that? Why was King doing this on -- why,
7 if you were concerned so much with the costs to the committee,
8 why couldn't this have been done on a volunteer basis?
9 THE WITNESS: I don't know why, with one exception,
10 that I would say I honestly believe that was probably King's
11 decision. "Am I an employee of MediAmerica at this time
12 or am I not?"
13 BY MR. LEVIN:
14 Q You left that up to her?
15 A Why not?
16 Q Did she say anything about whether she would rather
17 work on a voluntary basis afterwards or on an employee basis
18 of MediAmerica?
19 A I don't really know. I don't really recall if
20 she did or didn't.
21 Q I don't understand then. How was a decision made?
22 I mean, who decided? Was this done out of thin air?

A No. I believe she did. I believe she did. She was the one who was responsible for compiling exactly as accurately as possible what time anybody spent on the committee as a client to the committee versus as a volunteer to the committee, so that those could be as separate as possible. And if it was spent on corporate time, as an employee, well, then that had to be billed. If it was as a volunteer, that did not have to be billed.

Q Did she make that decision as a treasurer of the committee or as an employee of MediAmerica?

A I think as an employee of the company when it concerned writing an invoice that would be billed. I would assume that is when she made it. I wasn't inside her head.

Q So as an employee of MediAmerica, she was making a decision as to whether or not this could be done by the committee on its own volunteer time or this could be done by MediAmerica as part of its services rendered to the committee?

A I would say that is, you know, as accurate as could be, I guess, yes.

Q She could have stepped out of one capacity into another to make that decision?

A I don't really know what went on in her head per se.

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MR. SPARKS: Do you have many more questions?

MR. LEVIN: Yes.

MR. SPARKS: It is 11:30 now. How many more? We both have appointments elsewhere. We are trying to plan our day.

MR. LEVIN: We are going to be here I think another hour.

MR. SPARKS: Can we take a brief recess then to make some calls?

MR. LEVIN: Sure.

(Brief recess.)

MR. LEVIN: On the record.

MR. SPARKS: Before we proceed, Mr. Geske may have something he would like to say concerning the last series of questions.

MR. LEVIN: Why don't we reserve that for the end of the questioning.

MR. SPARKS: Why don't we get it while it is all fresh in our minds.

MR. LEVIN: I would prefer to do that at the end of questioning. He can make whatever statements he wishes.

MR. SPARKS: All right.

1 BY MR. LEVIN:

2 Q Mr. Geske, do you recall when Shirley King left

3 the company?

4 A No, not exactly. No, I don't.

5 Q Do you recall there being a dispute which led to

6 her leaving the company?

7 A Yes. Yes, I do.

8 Q What was that dispute about?

9 A She wanted more money, and I basically said, "I

10 don't think you warrant more money because you have made

11 significant errors," very, very significant errors.

12 Q Were these errors related to the committee at all?

13 A No. Again, as an employee of the company, that

14 was my only concern.

15 Q Were they related to the employee's work for the

16 committee, I mean to MediAmerica's work for the committee?

17 A They may have been.

18 Q Do you recall?

19 A No, I don't. Specifically, I was concerned with

20 her performance as an employee of MediAmerica. It was inadequate.

21 I had problems with it.

22 Q Did she mention anything about the hours she was

putting in, complaining about the number of hours she was putting in?

A She did, yes.

Q Did she complain about the number of hours she was putting in for MediAmerica's work for the committee?

A No.

Q Had she ever done that?

A Not that I am aware of, no.

Q Did she say anything about the fact that she had to sign certain documents that she hadn't read for the committee reports?

A No.

Q How about any responses to the Federal Election Commission?

A No, not that I am aware of.

Q Was she terminated by you or did she quit the company?

A What she actually did is came into my office one day and was complaining about some other employees, as I recall, and said, "I have had enough. I quit." I said, "Fine." She then later called me at my house and said, "I want to retract that because an employee should give a two-week notice."

Q Did Shirley King have control over the hours that she put in for MediAmerica's services for the committee?

A No, no. I don't think so at all.

Q So who had control over the hours that she put in working for MediAmerica in providing services for the committee?

A That would have been dictated by whatever needed to be done.

Q Did you ever tell her that she wasn't working enough on the committee account?

A No. I don't ever remember saying that to her.

Q Did you ever tell her she was putting in too many hours and this was resulting in too much billing to the committee?

A No, I don't recall that.

Q Did you have any communications with her as to the hours she was putting in for the committee?

A As an employee of MediAmerica, providing a service to a client, I did state very specifically that any time there is activity related to that client, it must be recorded, period.

Q When you received the results of the first mailing

1 and they were caged and batched, where were the checks deposited?
2 A At the depository of the client.
3 Q There was a separate account?
4 A Yes.
5 Q Was it a separate bank account?
6 A Oh, absolutely, yes.
7 Q Did you do that for other clients, have a separate
8 bank account?
9 A No. If it was requested, yes, we would have. Other
10 clients had not requested that as a service of the company.
11 Q Had you ever done that? Have you ever done that
12 for another client?
13 A Not to the best of my knowledge, no.
14 Q How about The Conservative Caucus? Have you ever
15 done that for them?
16 A I don't really know.
17 (Witness and counsel conferring.)
18 THE WITNESS: We did not do caging and batching
19 for The Conservative Caucus. If we did, that would have
20 necessitated most likely opening up an account and making
21 deposits then.
22 MR. LEVIN: I am asking the reporter to mark this

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as FEC Exhibit No. 3.

(The documents entitled "Bank Reconciliation" were marked FEC Exhibit 3 for identification, a copy of which is attached to the court copy of this deposition.)

MR. LEVIN: I am showing Exhibit No. 3 to the witness and counsel.

BY MR. LEVIN:

Q Can you identify Exhibit No. 3, FEC Exhibit No. 3?

MR. SPARKS: Yes or no.

THE WITNESS: No.

BY MR. LEVIN:

Q Do you know what TCC would stand for?

A The Conservative Caucus.

Q I would like to refer you to the second-to-the-last page of this document, the first column of figures, that MA. Would that stand for MediAmerica?

MR. SPARKS: He has already testified, Mr. Levin, he doesn't know what this document is. Perhaps you could tell him what this is so he could more properly answer your question.

MR. LEVIN: These are bank reconciliation documents, and this reflects MediAmerica's account and some other accounts.

1 MR. SPARKS: Was it submitted to the Commission
2 by MediAmerica?
3 MR. LEVIN: It was submitted to the Commission
4 by another witness in this matter, Mr. Brill.
5 MR. SPARKS: All right. And you have a question?
6 BY MR. LEVIN:
7 Q That MA -- well, let's go to TCC. What would that
8 stand for?
9 MR. SPARKS: Do you know?
10 THE WITNESS: The Conservative Caucus.
11 MR. SPARKS: Do you know that?
12 THE WITNESS: Well, I don't know exactly.
13 MR. SPARKS: Answer what you know.
14 THE WITNESS: I am assuming it would.
15 BY MR. LEVIN:
16 Q Did MediAmerica have a separate account as to The
17 Conservative Caucus?
18 A Yes.
19 Q Why did they do that?
20 A To keep as accurate a tally as possible of when
21 that client paid bills or whatever.
22 Q Why was it necessary to do that as opposed to

8 3 0 4 0 4 5 2 5 3

other clients?

A It really wasn't, and in fact we didn't before. It just seemed more straightforward for that particular client.

Q Why did it seem more straightforward?

A On advice of accountants, I suppose. You know, I don't really know why. I am sure that -- I would imagine that the accountants said this would be better, and I said fine.

MR. SPARKS: Mr. Levin, Mr. Geske has said he did not maintain a separate account for any caging and batching occasions for The Conservative Caucus. Indeed he didn't do that. What does this line of questioning have to do with the line on caging and batching?

MR. LEVIN: This line of questions doesn't have to do with caging and batching necessarily, but it goes to the maintenance of a separate account.

MR. SPARKS: I understand that. What does it have to do with this investigation?

MR. LEVIN: It has to do with the course of conduct between MediAmerica and the committee under investigation as to whether this kind of conduct was conducted with any other committees in terms of the maintenance of a separate

8 3 0 4 0 4 0 5 2 6 4

account, separate books, separate tallies, such as this. It would be very helpful to find out why this was done. I mean, it may be a totally different situation from what we have here. It may be the same thing.

MR. SPARKS: Do you know --

THE WITNESS: I don't even know what this is, to be honest with you.

BY MR. LEVIN:

Q Let's not refer to the document then. Let's talk in terms of the fact that you know that MediAmerica had The Conservative Caucus as a client. Is that correct?

A That is correct, yes.

Q Was this a large client?

A Yes.

Q Let me be up front. It seems curious to me you would have a separate account for a client. Did you do this for any other clients?

A I don't understand what you mean by that question.

Q Did you have a separate account for other clients like this?

A TCC, The Conservative Caucus, I don't believe had a separate account, to the best of my knowledge.

1 MR. SPARKS: Excuse me. I am getting confused
2 now. Mr. Levin, when you say a separate account, you mean
3 a separate bank account with a bank?
4 MR. LEVIN: Let's say a separate bank account.
5 MR. SPARKS: With a separate account number, maintained
6 at some banking institution? Is that the context of your
7 question?
8 MR. LEVIN: That is a possibility. I would like
9 to know that.
10 MR. SPARKS: I am sorry. Please ask the question
11 as you want it phrased. I am sorry. Maybe I am confusing
12 things.
13 BY MR. LEVIN:
14 Q We have a listing of MediAmerica and The Conservative
15 Caucus. There appears to be on MediAmerica's records a separate
16 accounting for The Conservative Caucus. My question, very
17 simply, is why that would be so when it wasn't for any other
18 company that we know of, any other client, except for the
19 committee under investigation at this point.
20 A I don't know, really. I would assume the accountant
21 who did the work made that decision. It is as simple as
22 that.

9 5 2 5 6 0 4 0 3

1 Q Let's get back to the caging and batching. Did
2 you have a separate bank account for the National Republican
3 Candidates' Committee?
4 A As a client, yes, they did have a separate bank
5 account; a completely separate organization.
6 Q Did any other client, to your knowledge, have such
7 an arrangement?
8 A I am sure all of them do.
9 MR. SPARKS: Did they or --
10 BY MR. LEVIN:
11 Q Did MediAmerica have such an arrangement with any
12 other client?
13 A No. No.
14 Q In other words, did --
15 A I don't know if I really understand the question.
16 MR. SPARKS: Fine.
17 BY MR. LEVIN:
18 Q Either in a client capacity or in any other relation-
19 ship by MediAmerica personnel with the political committee,
20 was there a separate bank account set up for any one of the
21 clients that MediAmerica dealt with?
22 A Do you mean did clients of MediAmerica as a routine

3 3 0 4 0 4 5 2 5 7

1 maintain and have separate bank accounts? Is that what you
2 mean by the question?
3 Q No, no.
4 Did MediAmerica set up any separate bank accounts
5 for the other clients?
6 A No.
7 Q Who set up the committee bank account?
8 A For the Candidates' Committee?
9 Q Yes, the Candidates' Committee.
10 A I believe Karen Dent did.
11 Q Under whose instructions? On whose instructions?
12 A I asked her if she would open up an account for
13 that client.
14 Q When did you do that?
15 A I don't really know.
16 Q Would it have been at the time that the committee
17 commenced operations?
18 A Whatever the date was. I don't really recall.
19 MR. SPARKS: Speak up.
20 BY MR. LEVIN:
21 Q Did any committee funds go into the MediAmerica
22 bank account before you set up that separate bank account

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1 for that committee?

2 A No.

3 Q When these checks were received, did anybody endorse

4 these checks over to MediAmerica, the checks for the committee?

5 A No, not to my knowledge at all.

6 Q Within the caging and batching process itself,

7 was there anything different that Miss King, or whoever was

8 caging and batching, was there anything different that they

9 would do for the committee that they wouldn't do for another

10 client?

11 A No.

12 Q Did MediAmerica in processing checks for other

13 clients build a data base that was used by the committee

14 for future mailings?

15 MR. SPARKS: I got lost in that question.

16 BY MR. LEVIN:

17 Q Those names that they received, you know, on the

18 checks when they were caging and batching for, let's say,

19 other committees that they might have done, would they take

20 those names and use them or did they take those names and

21 use them for mailing lists?

22 A Who?

3 3 0 4 0 4 5 2 6 6

Q Whoever was caging and batching, King, or MediAmerica. Let's say did the company take those names and use them for the committee, for the mailing lists?

A If the names belonged to the client, then the names belonged to the client and they were the exclusive right of the client, any client.

Q Did you have any co-ownership arrangements with any clients as far as the use of the names?

A I don't really recall. I may have, yes, but I don't really recall.

Q How usual was that for you to have co-ownership arrangements with a client?

A It would be totally routine, if a client would agree.

Q Did you work out a co-ownership arrangement with the committee?

A As a matter of fact, yes. It was my intention that MediAmerica would co-own names for this client and any client from that point on that would agree to it.

Q Was this in written form?

A No. It was not --

MR. SPARKS: Fine.

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(Witness and counsel conferring.)

MR. LEVIN: I would like to introduce this as FEC Exhibit No. 4.

(The MediAmerica invoices were marked FEC Exhibit 4 for identification, a copy of which is attached to the court copy of this deposition.)

MR. SPARKS: And show it to the witness?

MR. LEVIN: And we are showing FEC Exhibit 4 to witness and counsel. I would like the witness to look at every page of this document.

BY MR. LEVIN:

Q Can you identify this document?

A Yes.

Q What is it?

A They are invoices, MediAmerica invoices to the client, Candidates' Committee.

Q Have you seen this document before?

A Yes.

MR. SPARKS: For the record, Commission 4 is a four-page exhibit which consists of invoice number 758, a numbered invoice on MediAmerica letterhead, then two more invoices, invoice numbers 772 and 776, which appear to be

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on MediAmerica letterhead, all addressed to the National Republican Candidates' Committee.

BY MR. LEVIN:

Q Who filled out this document?

MR. SPARKS: Excuse me. Which page?

MR. LEVIN: FEC Exhibit No. 4, any of the pages or all of the pages.

THE WITNESS: I don't know.

MR. SPARKS: When you say filled out, you mean prepared it?

MR. LEVIN: Prepared it.

THE WITNESS: I believe I prepared 758. I don't know about number 10. I don't -- I believe Mrs. King filled out 772. 776, I believe that was King's, although I --

MR. SPARKS: Okay. If that is your belief, that is your belief. Leave it at that.

BY MR. LEVIN:

Q On this document, do you see any line for the billing of provision of lists by MediAmerica, list rental?

A No, I don't.

(Witness and counsel conferring.)

BY MR. LEVIN:

Q So who provided the list for the mailings?

A John Romanin was responsible for putting those together.

Q Was that supposed to be a service rendered by Medi-America to the committee?

A Yes.

(Witness and counsel conferring.)

THE WITNESS: I don't see any list billed on these, but if these are all the invoices, then it should have been billed. I believe it should have been billed, definitely. If it wasn't, I don't know why. It could have just slipped through the cracks. Sometimes that happens when invoices are prepared for any client, and we don't find that out until sometime later.

BY MR. LEVIN:

Q Did the committee ultimately pay for those lists?

A That I don't know.

Q Who would have been in charge of seeing that the committee paid for those lists? Who would have made that decision?

A I would have.

Q And you don't recall whether or not payment was made for those lists?

A No, I don't.

Q What were the funds used for eventually?

MR. SPARKS: What funds?

MR. LEVIN: Let's rephrase that.

THE WITNESS: What funds?

BY MR. LEVIN:

Q The funds received from this mailing that we have been discussing with reference to that document showing the content of the mailing, what were the funds received used for?

MR. SPARKS: I am sorry; I got lost.

MR. LEVIN: Okay.

BY MR. LEVIN:

Q You recall the document we introduced showing the --

MR. SPARKS: Number 2?

MR. LEVIN: No. That document. FEC Exhibit No. 2, okay. So we are still referring to this mailing, just by reference then.

BY MR. LEVIN:

Q You received funds, checks. The committee received

8 3 0 4 0 5 2 7

contributions. What were those funds used for?

A The same as they would for any client, to pay for the costs of the committee and to conduct their activities.

Q What specific activities were they used to fund at this point?

A Contributions to candidates, and again the activities to support the committee.

Q Were there any meetings discussing any aspects of the results of the first mailing? Did you talk with Romanin or King or anyone else associated with the committee?

A No, not that I recall.

MR. SPARKS: FEC 2 was not the first mailing. It was one of what may have been up to three.

BY MR. LEVIN:

Q This specific mailing then. Were there any discussions as to any aspect of the results of this mailing?

A Oh, I thought the results were quite good in comparison to other clients, and I attributed it to a good direct mail piece.

MR. LEVIN: I am asking the reporter to mark this as FEC Exhibit No. 5.

0 3 0 4 0 4 5 2 7 5

(The document dated 12/5/80 was marked FEC Exhibit 5 for identification, a copy of which is attached to the court copy of this deposition.)

MR. LEVIN: I am showing FEC Exhibit No. 5 to witness and counsel.

BY MR. LEVIN:

Q Can you identify FEC Exhibit No. 5?

A It is a direct mail piece for the client Candidates' Committee.

Q You see the date at the top there, December 5, 1980?

A Yes.

Q Was this the next mailing after the one shown in FEC Exhibit No. 2?

A I don't know.

Q Can you recall how many people may have received this mailing or how many you sent it out to?

A No. But I am sure the invoices would indicate.

Q Can you recall what list you used to send this out?

A No.

Q In a practice such as this, where you have multiple

9 3 0 4 0 5 2 7 6

mailings, would you send it out to the same people?

A If they were contributors, yes.

Q What if they hadn't contributed already? What if they hadn't contributed? Would you then not send them this kind of, well, second or third, whatever the mailing was?

A No, not necessarily at all.

Q Would you try to generate new names for this mailing?

A I don't think I understand what you mean when you say generate new names for this mailing.

Q In other words, would you try to get a list or make or develop a list of new names for this mailing?

A The goal for any client, that is a new client, like the Candidates' Committee, is to create names that are considered and called in the industry house file names that are then mailed on any schedule that is tested to be a good mailing schedule.

Q Did MediAmerica bill the committee for these new names?

A Did MediAmerica bill the committee?

Q The committee, for this new list.

A For these new names? You asked about lists earlier.

8 3 0 4 0 4 5 2 7 7

I did not see a list billed on here. Any lists that were acquired by MediAmerica as a service for the Candidates Committee or any other client or any other committee should have been billed.

Q Do you recall where you got a list for the December mailing?

A I had asked John Romanin initially to get the lists for the Candidates' Committee.

Q So he would have been in charge of doing that for this mailing as well?

A Yes. I had assumed that was a continuation.

Q Did you supervise him at all or just assume he would perform his function?

A No, I didn't supervise him.

Q You just assumed he would perform his function?

A Yes. That is correct.

Q When did you or anyone else at MediAmerica first become aware of a complaint to or by the U.S. Postal Service?

A I don't recall or know a specific date.

MR. LEVIN: I am asking the reporter to mark these documents as FEC Exhibits 6, 7 and 8.

(The letter dated December 12, 1980 was marked FEC Exhibit 6 for identification, a copy of which is attached to the court copy of this deposition.)

(The letter dated January 21, 1981 was marked FEC Exhibit 7 for identification, a copy of which is attached to the court copy of this deposition.)

(The letter dated January 23, 1981 was marked FEC Exhibit 8 for identification, a copy of which is attached to the court copy of this deposition.)

MR. LEVIN: I am showing FEC Exhibits 6, 7 and 8 to the witness and counsel.

BY MR. LEVIN:

Q Does this refresh your recollection as to when you became aware of the complaint to the U.S. Postal Service?

A I would assume it is December 12, 1980.

MR. SPARKS: Which is the date on FEC 6.

MR. LEVIN: Correct.

BY MR. LEVIN:

Q Did you know who filed the complaint?

A No.

Q Did you have any sense at the time for who filed the complaint?

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A No.

MR. SPARKS: Mr. Levin, does this have anything to do with this investigation; and, if so, could you at least put a proffer on the record as to why you are asking this course of questions? I have let you go into this to see if we are going in the rough direction of this investigation.

MR. LEVIN: It will develop in the sense that we are wondering about -- we have heard testimony on Friday that the Republican National Committee may have filed the complaint, plus the Postal Inspector said it was filed by the Republican National Committee.

MR. SPARKS: I can tell you that is the information which we have. We have not been able to confirm it beyond that, except that I can tell you at approximately this time I met with counsel for the Republican National Committee and they told me that they had filed such a complaint. Does that answer your question?

BY MR. LEVIN:

Q When did you become aware of this?

A The date of the letter, I would assume.

Q When were you aware that the Republicans might have filed this complaint, or just a sense? I mean, did you have

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1 a sense that the Republicans might have filed this complaint?

2 A I don't really recall. I just received this on that

3 date. You know, somebody is filing a complaint. Respond to

4 it.

5 (Witness and counsel conferring.)

6 THE WITNESS: The date of the letter is December 12.

7 I would assume that given three days' mail, it was, you know,

8 the 14th or the 15th or something.

9 BY MR. LEVIN:

10 Q Is this your mail stamp date or the Postal Service's

11 date?

12 A I don't know if that is or not.

13 MR. LEVIN: That is the December 12th on Exhibit 6,

14 for the record.

15 THE WITNESS: Yes. I don't know if that is an in-

16 house received date or if that is the actual date that is

17 there. I don't really know. I would imagine it is this

18 man's number.

19 MR. SPARKS: For the record, on FEC 6 there appears

20 to be a telephone number at the top righthand corner. Is

21 there any inquiry about that telephone number?

22 MR. LEVIN: That appeared on the document that we

3 3 0 4 0 4 5 2 3 1

1 received, right?

2 MR. MIMS: I believe that was on his as submitted.

3 MR. SPARKS: All right.

4 BY MR. LEVIN:

5 Q Did you have a concern that you might be in trouble

6 with the Republicans when you heard about this complaint?

7 MR. SPARKS: My earlier question is now pending,

8 and it has now elevated to an objection. I fail to see what

9 an inquiry about any Postal Service investigation has to do

10 with the pending complaint investigation of the Commission

11 which relates to a separate, segregated fund.

12 MR. LEVIN: Very simply, the MediAmerica received

13 correspondence from some of the Republican candidates with

14 respect to this, and I think it is worth pursuing. I will

15 introduce that document.

16 To further satisfy that, let's look at the text of

17 Exhibit No. 5. Underlined is the phrase, "I urged each

18 candidate to spend the minimum of $50,000 on last minute TV

19 and radio advertisements with my promise to help them after

20 the elections."

21 For your information, Mr. Sparks, the Postal

22 Inspector has stated that mail fraud is a part of the complaint,

1 and that goes to the text of the Urge-Gram itself.

2 MR. SPARKS: I understand there is a pending Postal

3 Service investigation. My question is what does it have to do

4 with this investigation?

5 MR. LEVIN: I think it has to do with the conduct

6 of the committee. As I said before, it has to do with the

7 conduct of the committee as it relates to those Republicans

8 from whom it received correspondence.

9 MR. SPARKS: It does indeed, but the investigation

10 with respect to the conduct of the committee does not address

11 all aspects of the conduct of the committee.

12 MR. LEVIN: We are dealing with candidates to whom

13 the committee made contributions. I would like to explore

14 that further.

15 MR. SPARKS: Then ask that question.

16 MR. LEVIN: I will get to that. I believe I have to

17 lay the basis for that.

18 MR. SPARKS: Do you have a pending question now?

19 MR. LEVIN: I have a number of pending questions.

20 BY MR. LEVIN:

21 Q Mr. Geske, did either you or Mr. Romanin actually do

22 this urging?

A Oh, that I don't recall. I did not. Personally I did not, no.

(Witness and counsel conferring.)

MR. LEVIN: I would like the reporter to mark this as FEC Exhibit No. 9.

(The letter dated March 30, 1981 was marked FEC Exhibit 9 for identification, a copy of which is attached to the court copy of this deposition.)

MR. LEVIN: I am showing FEC Exhibit 9 to witness and counsel.

BY MR. LEVIN:

Q Can you identify FEC Exhibit No. 9?

A Yes.

Q What is it?

A It is a letter from Senator Symms saying that basically --

MR. SPARKS: The letter speaks for itself.

THE WITNESS: Whatever the letter says.

BY MR. LEVIN:

Q Had you communicated with Senator Symms as to the use of his name in that solicitation before you dated the solicitation of December 5th?

8 3 0 4 0 4 5 2 3 4

A No, not that I recall anyway. Romanin may have.

MR. SPARKS: For the record, FEC 5, dated December 5, 1980, was signed by Romanin, not by Geske. It is written in the first person. These questions might better be addressed to Romanin.

(Witness and counsel conferring.)

MR. SPARKS: Do you need a couple minutes to look?

MR. LEVIN: Yes.

Off the record.

(Brief recess.)

MR. LEVIN: Back on the record.

BY MR. LEVIN:

Q At the top of the Symms letter, that is FEC Exhibit No. 9, it refers to a request for clarification. What request for clarification was that?

A I believe I called Chris Lay, the Senator's aide.

Q When did you make that request?

A I don't recall. I am sure sometime around the date of this letter.

Q So it would have been well after the mailing?

A It could have been, yeah. I don't really know for sure.

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Q When you heard notification of this complaint in the Postal Service, were you concerned about being in trouble with the Republicans?

A No.

MR. SPARKS: Who do you mean? I am a Republican. He wasn't in trouble with me. Could you be a little more specific?

BY MR. LEVIN:

Q In trouble with let's say the RNC or the National Republican Congressional Committee.

A Me personally?

Q Or the committee as an entity.

A Me personally, MediAmerica as an employee, or --

Q The committee.

A -- or as a committee, a member of the committee?

Q You as the committee and you as a major employee of MediAmerica, either one.

A And what was the question again?

Q Were you concerned about being in some kind of trouble with them? Was there this general atmosphere of "Oh, what is this going to do with our relations with potential clients, with people that we have to deal with, either" --

MR. SPARKS: Mr. Levin, I have been patient with you and now I instruct him not to answer. If you have a point, why don't you ask the question and let's get to it.

MR. LEVIN: Then let's get to it.

BY MR. LEVIN:

Q Were you concerned about the Republicans questioning the legitimacy of the National Republican Candidates' Committee?

MR. SPARKS: That is the same question in another form. What does it have to do with this investigation with the FEC?

MR. LEVIN: I think we will get to that. I will get to that in the next two or three questions.

MR. SPARKS: Get to that now. I am going to instruct him not to answer questions of what was going on in his mind vis-a-vis the RNC because that has no discernible connection with this investigation.

MR. LEVIN: Does the witness refuse to answer the question?

MR. SPARKS: On the advice of counsel.

THE WITNESS: Yes, on advice of counsel.

MR. SPARKS: If you have a question, if you have a

point, why don't you ask that question?

BY MR. LEVIN:

Q Mr. Geske, at a point when the committee owed $14,000 to MediAmerica, why did you pick the time you did to make the contributions you did to the candidates?

A Why did I pick the time?

Q Why did you do it then in late December of 1980?

MR. SPARKS: You haven't established that he did.

MR. LEVIN: Let's establish that he did, then.

I will introduce this as FEC Exhibit No. 10.

(The document entitled "Report of Receipts and Disbursements" was marked FEC Exhibit 10 for identification, a copy of which is attached to the court copy of this deposition.)

MR. LEVIN: I am showing FEC Exhibit No. 10 to witness and counsel.

MR. SPARKS: It appears to be a six-page document and is apparently a report of receipts and expenditures dated 12-31-1980 by the National Republican Candidates' Committee. It appears to be on a series of FEC forms or schedules.

MR. LEVIN: I am going to ask the witness has he seen this document before.

THE WITNESS: Yes.

1 BY MR. LEVIN:

2 Q I am going to refer you to Schedule B. That is page

3 three of the document.

4 MR. SPARKS: Page one of two of Schedule B?

5 MR. LEVIN: Right; and page four also. It is not all

6 of Schedule B, but Schedule B is the third and fourth page of

7 this document.

8 BY MR. LEVIN:

9 Q Is this a list of those to whom the National Republican

10 Candidates' Committee made contributions?

11 A Yes. To the best of my knowledge, it is.

12 Q Do you recall these contributions being made?

13 A Not really, no.

14 Q Who made the decision to make these contributions?

15 A I believe John Romanin.

16 Q Did you have any say as to whether or not the

17 committee would make these contributions?

18 A The purpose of the committee was to help candidates.

19 Clearly that was the purpose of the committee. And this just

20 appears to be its normal activities, making contributions to

21 candidates. I assume John Romanin made these selections and

22 that was it. Again --

8 3 0 4 0 1 5 2 3 6

1 MR. SPARKS: Okay, okay.

2 (Witness and counsel conferring.)

3 MR. SPARKS: The question has been answered.

4 BY MR. LEVIN:

5 Q So did Mr. Romanin make this decision on his own?

6 A I believe he did, yes.

7 Q When did he apprise you of this decision?

8 MR. SPARKS: Which decision, the decision to make

9 contributions to the candidates reflected on pages one and two

10 of Schedule B?

11 MR. LEVIN: Correct. Thank you. That needed

12 clarification. Yes.

13 THE WITNESS: What was the question?

14 BY MR. LEVIN:

15 Q When did he apprise you of the decision to make these

16 contributions to the candidates listed on the exhibit before

17 you?

18 A I don't really know.

19 Q Did he apprise you of that?

20 A I don't know if he did.

21 Q Did you know of any concern on his part or your part

22 that these contributions had to be made now in light of a

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complaint from the Republicans?

A No.

MR. SPARKS: The Republican National Committee?

MR. LEVIN: Or the Republican National Committee more specifically.

THE WITNESS: No.

BY MR. LEVIN:

Q But for the complaint, would you have made these contributions later?

MR. SPARKS: I believe the testimony is Mr. Romanin made them.

BY MR. LEVIN:

Q Mr. Romanin never said anything to you about that subject, though?

A I don't really recall. He may have. I just don't remember if he did or not.

MR. SPARKS: Okay.

MR. LEVIN: I am going to have the reporter mark this as FEC Exhibit No. 11.

(The document entitled "1980 Republican Senatorial Winners" was marked FEC Exhibit 11 for identification, a copy of which is attached to the court copy of this deposition.)

8 3 0 4 0 4 5 2 9 1

MR. LEVIN: I am showing FEC Exhibit 11 to counsel and the witness.

BY MR. LEVIN:

Q Can you identify FEC Exhibit 11?

A Yes. I have seen it before. I am not sure what it really was, but I have seen it before, yes.

Q But you are not sure what it was, is that what you just testified?

A Well, it says "1980 Republican Senatorial Winners." I assume that is what it is.

Q Whose handwriting is this?

A I don't really know.

Q Is it your handwriting?

A Definitely not. I don't think so.

Wait a minute.

Q Who prepared this list?

MR. SPARKS: Just a second. For the record, 11 is a three-page document which consists of both typed and typewritten material and handwritten material. The handwritten material appears to be in at least two or perhaps three different kinds.

Do you know whose that is? Is it yours?

THE WITNESS: I don't really think it is. It doesn't

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1 look like it. This one thing here may be, but I don't think so.
2 I really don't think so.
3 MR. SPARKS: So what is the answer?
4 THE WITNESS: What is the question? I am sorry.
5 If the question is is any of this handwriting mine --
6 MR. LEVIN: Yes.
7 THE WITNESS: No.
8 BY MR. LEVIN:
9 Q Do you know what purpose this list would have been
10 compiled for?
11 A Well, as it says, "1980 Republican Senatorial Winners."
12 Q Was it compiled in connection with the committee?
13 A I don't know for sure. It may have been.
14 Q Had you ever seen this document before? I may have
15 asked that.
16 A Yes. I have seen it before.
17 Q When did you see this document?
18 A I have no idea.
19 Q Going back to the prior exhibit, FEC Exhibit No. 9 --
20 MR. SPARKS: Number 9 or 10?
21 MR. LEVIN: The exhibit with the Schedule B. That
22 is 9?

8 3 0 4 0 4 5 2 9 3

MR. SPARKS: That is 10.

MR. LEVIN: Okay.

BY MR. LEVIN:

Q You say that Mr. Romanin may not have apprised you even of the making of these contributions. Did you have any discussions with him prior to the making of these contributions as to making these contributions?

A Yes.

Q What discussions were those?

A I don't recall specifically, but I am sure that there was a time when as members of the committee, Candidates' Committee, we said, "Well, who will be the best people to give money for? Who needs the money?" Something of that nature. I don't really recall any details about it.

Q Were these discussions in December; in other words, shortly before the making of these contributions?

A I don't really know when they really took place.

Q Were they after the --

A I guess they could have been any time.

Q Were they after the filing of the Postal complaint?

A I don't really know that either.

Q In these discussions, would these specific names come

3 3 0 4 0 4 5 2 9 4

1 up, the ones on the list, on Schedule B, in the exhibit before
2 you?
3 A Oh, I don't know. It could have been anybody I
4 suppose, anybody as long as they were Republican and they just
5 needed to be a candidate. They had to be a Republican,
6 they had to be a candidate, they had to need money to pay off
7 a debt or to do something else; whatever the criteria was
8 that was set up to allow the committee to give a contribution.
9 Q When were you first apprised of these contributions?
10 A Oh, I don't really know.
11 Q When you saw the figures, the 10 candidates and
12 $500 contributions, did you think that was too low or too high?
13 A I don't really know if it had anything to do with
14 too high or too low. I think whatever the committee could
15 give.
16 Q What was your reaction then to the contributions?
17 A As long as that is what the committee can give,
18 everything the committee can give.
19 Q Who made that decision as to what the committee could
20 give?
21 A I believe John Romanin would have, but I am not
22 really sure of that.

8 3 0 4 0 4 5 2 9 5

1 MR. SPARKS: I can't hear. Speak up.

2 THE WITNESS: I believe John Romanin would have, but

3 I am not really sure who did. The goal of the Candidates'

4 Committee was to raise money, to help candidates do so. It was

5 as simple as that.

6 BY MR. LEVIN:

7 Q At any time did you anticipate making the decision to

8 make contributions from the committee's funds, to make the

9 decisions for the committee as to making contributions?

10 A Not that I know of.

11 Q This was all to be left to Mr. Romanin?

12 A I don't know why not.

13 MR. SPARKS: Was it or wasn't it?

14 THE WITNESS: I don't know. Yes or no. I don't

15 know.

16 BY MR. LEVIN:

17 Q Then who was it going to be left to? Wasn't there

18 some apparatus figured out as to who would make a decision as

19 to how these moneys would go out or where these moneys would

20 go?

21 A I can only say I guess that would be John Romanin.

22 Q Was he in charge of the committee then as far as the

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1 day-to-day operations?

2 A For the most part, yes.

3 Q What was your function?

4 A Volunteer to the committee.

5 Q If it came down to a disagreement between you and

6 Mr. Romanin as to who was to make a decision as to how money

7 was going to be spent or how much services the committee should

8 ask from MediAmerica, who was to make that decision?

9 A I would -- it sounds like John Romanin.

10 Q What was your function then for the committee?

11 A As a volunteer to it, to help it get going as a

12 volunteer.

13 Q Who else was --

14 A At least that is how I viewed myself.

15 Q Who else was in on the decisionmaking process as to

16 those things I mentioned, how much services the committee would

17 want from MediAmerica and to whom the committee would contribute

18 besides you and Mr. Romanin?

19 MR. SPARKS: I got lost in the question; I am sorry.

20 BY MR. LEVIN:

21 Q Who else was in on the decisionmaking process besides

22 you or Mr. Romanin as to how much the committee would pay out

3 3 0 4 0 4 5 2 9 7

1 or how much services the committee would want from MediAmerica
2 or to whom the committee would contribute? Who else?
3 A I think the clear -- the thing that the Candidates'
4 Committee, you know, was to do would be up for the most part to
5 Romanin. If it was a company thing, for example, as a vendor,
6 the company billed the committee, and it had an invoice, it
7 better darn well pay.
8 MR. SPARKS: When you say the company, what do you
9 mean?
10 THE WITNESS: MediAmerica.
11 In terms of actual, how much services, if it concerned
12 any activity that we would have provided for the committee,
13 that I personally or MediAmerica would have provided to the
14 committee, then that would have been as a consultant thing
15 because that is the area of expertise that the committee
16 retained MediAmerica to provide them with. So we would say
17 so much when, where, how, that sort of thing. We would advise
18 in that respect.
19 BY MR. LEVIN:
20 Q Would you and Mr. Romanin have any dispute in your
21 respective capacities? For instance, let me be more specific.
22 Would you request payment from the committee and would

3 3 0 4 0 4 5 2 7 8

1 Mr. Romanin say, "No, the committee can't make the payment now"?
2 A I don't really recall if he did or not.
3 Q Would Mr. Romanin and you discuss the price to be
4 paid by the committee to MediAmerica?
5 A I don't recall a conversation like that.
6 Q You wouldn't have any disputes over that?
7 A Whatever the current market rate for the service is
8 is what would have been billed to the committee, as it would to
9 any other client.
10 Q Would you advise Mr. Romanin in your capacity as a
11 volunteer for the committee as to how the committee should deal
12 with MediAmerica?
13 A I don't believe any conversations like that took
14 place. I don't think he asked for any specific advice.
15 Basically the committee again retained the company to provide
16 services that it has expertise in.
17 Q Who else for MediAmerica was involved in the decision-
18 making process of the committee?
19 A No one that I am aware of.
20 Q Not Shirley King?
21 A No. I don't believe she was involved in anything
22 other than making sure reports were done correctly and on time.

8 3 0 4 0 4 5 2 9 3

1 Q Not Karen Dent?

2 A I don't think so, no.

3 Q Who had possession of the books and records during

4 the time that King was treasurer?

5 A King did, I believe.

6 Q Where did she keep those books and records?

7 A I would assume in the space rented by the -- as a

8 matter of fact, they were in the space rented by the

9 Candidates' Committee, in a filing cabinet.

10 Q Did you have any dispute with Mr. Romanin at all in

11 the conduct of the committee's activities or in the relationship

12 between the committee and MediAmerica?

13 A None whatsoever that I can remember.

14 Q It was all very harmonious? You never disagreed on

15 anything?

16 A There may have been a disagreement on --

17 MR. SPARKS: This question is in the context of the

18 relations between the committee and MediAmerica.

19 MR. LEVIN: Or in the conduct of the committee

20 itself or -- yeah, in the conduct of the committee itself. We

21 have two facets. One, the client-committee relationship, and

22 the conduct of the committee itself.

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1 BY MR. LEVIN:

2 Q Did you have any disagreements?

3 A At all?

4 Q Yeah, with Mr. Romanin.

5 A Concerning what?

6 Q Either of those two, the conduct of the committee

7 itself or the client relationship between the committee and

8 MediAmerica.

9 A I don't really remember if we did or not. I don't

10 think so, but I don't remember precisely. He may have objected

11 to something at one time or another.

12 (Witness and counsel conferring.)

13 BY MR. LEVIN:

14 Q Was there any question as to the idea with the

15 committee so much in debt, they were contributing $5,000 to

16 candidates -- 10 candidates, $500 contributions to each?

17 A Was there what?

18 Q A dispute between you and Mr. Romanin on that with

19 the present debt situation the committee was in?

20 A No, not that I recall.

21 Q How usual is it for a committee to make

22 contributions after only -- let's say if there were only two

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1 mailings, how usual would that be?

2 A It depends on the person making the decision at the

3 committee. I don't know how usual or unusual that would be.

4 Q Has the committee contributed to any candidates

5 since the contributions listed on Schedule B in front of you?

6 A Not that I know of.

7 Q Why not?

8 MR. SPARKS: What does that have to do with this

9 investigation?

10 MR. LEVIN: I think it has to do with the conduct

11 of the committee as a committee.

12 MR. SPARKS: I know it has to do with that. But what

13 does that have to do with this investigation?

14 MR. LEVIN: Well, the idea of whether he was

15 interested in functioning as a committee or whether he was

16 interested in functioning as an adjunct of MediAmerica, very

17 plainly.

18 BY MR. LEVIN:

19 Q Why hasn't the committee contributed to any other

20 candidates since then?

21 A On advice of counsel.

22 Q What?

8 3 0 4 0 4 0 5 3 0 8

A On advice of counsel. Basically not do anything until the matter is settled. Don't raise money. Don't do anything. Do as little as possible.

Q When MediAmerica deals with its clients, does it usually have a written contractual arrangement with its clients?

A No. Unless it is requested by a client.

Q Unless it is requested by --

A -- by a client. Generally, no.

Q Is there a distinction between how MediAmerica would conduct itself with phonebank clients and direct mail clients?

A I don't really understand that question.

Q Well, MediAmerica conducts direct mail operations, correct?

A Yes.

Q And it conducts phonebank operations?

A Yes.

Q Are these operations under the control of the same people or are they separated out somehow?

A Again I don't understand what you mean.

Q Might a client use only direct mail and not phonebank operations, or vice versa?

A Yes.

1 Q Now this committee, did they use phonebank operations?
2 A No.
3 Q They only used direct mail operations?
4 A That is correct.
5 Q What I am trying to get at is for some reason, for
6 whatever reason, does MediAmerica require written contracts
7 for direct mail, or require written contracts for phonebanks,
8 and would only require some kind of unwritten agreement for
9 its direct mail operations?
10 A Again, exactly what is the question? I am a little
11 bit confused.
12 Q You know your company. When you have a phonebank
13 operation --
14 MR. SPARKS: He knows the company, but he doesn't
15 know your question.
16 BY MR. LEVIN:
17 Q When you have phonebank operations, do you have
18 written contracts?
19 A Sometimes, yes.
20 Q More so than when you have direct mail?
21 A I would say yes.
22 Q Is there a reason for that?

0 3 0 4 0 1 0 5 3 0 4

A Yes, I think there is. Basically it is an extremely labor-intensive thing.

MR. SPARKS: What is?

THE WITNESS: Phonebank versus direct mail is extremely labor-intensive. It is also capital-intensive, extremely so, versus direct mail.

BY MR. LEVIN:

Q So you want to have a cash flow. You want to be able to pay these people in the phonebank?

A Oh, absolutely. Correct.

Q As opposed to the direct mail. The urgency is not as great?

A That is correct.

Q I just wanted that clarified.

Other than written contracts, would you have any kind of written memorandum of an agreement with a direct mail client?

A Not as a matter of routine.

Q Is it routinely the only written evidence you would have with any client would be let's say the invoice or bill for payment?

A One of the benefits of MediAmerica as a company is

1 that we do not insist on our clients having contracts, so we
2 never did. Many things were, "This is the project. We are
3 happy to do it. Here is what we charge. Go at it."
4 The clients distinctly prefer that kind of relationship. So
5 we were not in the habit of drawing up contracts, no. We were
6 not.
7 Q Was there any discussion, let's say between you and
8 Mr. Romanin or between you and anyone else, as to the possibility
9 of having a written agreement for transactions between
10 MediAmerica and the committee, the National Republican
11 Candidates' Committee?
12 A I don't recall any. I don't recall that John
13 Romanin ever requested one from them in his capacity as a
14 member of the committee.
15 Q Was there any discussion as to the need to collect
16 payment more promptly from the committee?
17 A Always. With any client.
18 Q Any client?
19 A Any client.
20 Q This was an ongoing process with the committee as
21 well?
22 A Sure. Always concerned. Any client who has a bill

6 3 0 4 0 4 5 3 0 1

to the company, I am personally concerned about it being paid, with any client. The goal is to get paid just like the invoice says, within 30 days, or as soon as we can, whatever arrangements may have been made.

Q Why wasn't such payment made by the committee expeditiously?

A I believe they were.

MR. LEVIN: I am asking the reporter to mark this as FEC Exhibit No. 12.

(The document referred to was marked FEC Exhibit 12 for identification, a copy of which is attached to the court copy of this deposition.)

MR. LEVIN: I am showing FEC Exhibit No. 12 to the witness and counsel.

MR. SPARKS: Exhibit 12 appears to be a five-page document, four pages of which is a Statement of Organization, a Report of Receipts and Expenditures filed according to the date stamp on February 4, 1982 with the Federal Election Commission, the first page of which appears to be from Sedam and Herge, signed by a Legal Assistant, forwarding such report to the Commission.

1 BY MR. LEVIN:

2 Q I ask the witness, can you identify this document?

3 Have you seen this before?

4 A Yes, I have.

5 Q So you reviewed this filing before it was sent to the

6 Commission?

7 A Briefly, yes.

8 Q Is this the most recent filing of the committee?

9 A I believe so.

10 Q I refer to the fifth page of the document, marked

11 Schedule D, Debts and Obligations, excluding loans. Can you

12 tell me why there is still this outstanding debt figure of

13 $12,349 if MediAmerica likes to have payment?

14 A On advice of counsel.

15 Q Is this still the balance outstanding?

16 A To the best of my knowledge, if that is what it

17 says, yes.

18 Q In other words, on advice of counsel, shutting down

19 the committee basically, you just wouldn't pay the debt.

20 MR. SPARKS: That wasn't his testimony, Mr. Levin.

21 MR. LEVIN: Then he should say whether it was or

22 wasn't.

8 3 0 4 0 4 0 5 3 0 1

MR. SPARKS: If you have a question, you should ask it.

BY MR. LEVIN:

Q If you could be more specific as to that on advice of counsel. Are you saying that the committee should not pay the debt?

A Oh, no. The committee should always pay the debt and I am sure will.

Q Was counsel representing you in the capacity of the committee at that point or was he representing you as Medi-America at that point?

MR. SPARKS: This firm's letter of representation is on file. It is clear who we represent and in what capacity. In addition, there is the letter dated July 30, 1981, from J. Curtis Herge of the firm of Sedam and Herge, to this firm concerning the amount of the outstanding debt owed by the committee to MediAmerica and the reasons it was outstanding. It is in the record why it was outstanding and it was on advice of counsel that it remains outstanding.

MR. LEVIN: Thank you.

BY MR. LEVIN:

Q Mr. Geske, let me ask you a few general questions.

9 3 0 4 0 4 5 3 0 9

1 They may be based upon your observations. I guess we have
2 established before that the committee operated within the
3 perimeters of the office of MediAmerica.
4 A It sublet space from the company.
5 Q Could you describe that?
6 A How so?
7 Q What space was sublet? What facilities were sublet?
8 What were the arrangements?
9 A A room that was previously a conference room was
10 sublet to the committee, furniture I believe, and typewriters,
11 things of that nature, filing cabinets or whatever.
12 Q Would the conference room or any of these other
13 facilities be used for any other accounts that MediAmerica
14 held?
15 A Not to my knowledge.
16 Q Were these facilities that were considered under the
17 operation of the committee and rented by the committee?
18 A Oh, yes.
19 Q So you have this conference room. Was that sublet
20 for a specific period of time, let's say each time it was used,
21 or was it sublet for that entire period just for the
22 committee's use?

A I believe it was sublet on a month-to-month basis.

Q Would MediAmerica use that conference room for any other purpose, or did it during that time that it was sublet to the committee?

A It may have, but I don't really know.

Q Were people instructed not to use that conference room because it was the committee's leasehold?

A I don't really remember if they were specifically instructed. I think there was something that whenever you do anything that is committee business, that is where it is done. If it is MediAmerica's business, do not. Something like that. But I don't really recall exactly.

Q How about phone arrangements? How were those worked out?

A The Candidates' Committee installed a phone.

Q A whole separate phone?

A It was a shared type of thing where it had its own phone system.

Q Was any MediAmerica business conducted on that phone?

A Not to my knowledge.

Q Were people instructed not to conduct MediAmerica business on that phone?

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A Oh, absolutely. I think that is --

MR. SPARKS: I am getting lost. I thought the testimony was that the committee shared part of MediAmerica's phones. That is what I thought I heard. But now I am hearing --

MR. LEVIN: I thought there was a subsequent clarification.

BY MR. LEVIN:

Q What is the situation then? Let's go back. What was the situation with the phones? How was the arrangement set up?

A That the Candidates' Committee had their own phone.

Q Were people instructed not to use that phone, other than those who were acting on behalf of the committee?

A To the best of my knowledge, yes.

Q Did you instruct anybody as to that?

A I am sure I did, yes.

Q Any other arrangements -- file cabinets, anything like that -- that there were separate facilities?

A Not that I know of.

Q Did you have discussions with Mr. Romanin about the committee at the workplace during the time period that it was in actual operation?

A Yes.

1 Q Where would these discussions be conducted?

2 A Mark V Eatery.

3 Q This is outside the perimeters?

4 A Yes. It could have been anywhere. I don't really

5 know where we sat down.

6 Q Did you have any discussions within the perimeters

7 of the workplace?

8 A I am -- we may have, yes.

9 Q Was Mr. Romanin acting on behalf of the committee

10 when those discussions went on?

11 A I always assumed so, yes.

12 Q Did he make an arrangement to separate out his time

13 between his functions for MediAmerica and his functions

14 representing the committee to you when you had these

15 discussions?

16 A Yes.

17 Q Even when you just had discussions about the

18 committee, he would let's say take 15, 20 minutes and separate

19 it out?

20 A If it was committee business, yes.

21 Q What would you do with that? Would you separate

22 your time out?

A As a volunteer, no; unless I was acting as the vendor -- acting as a vendor.

Q Acting as a vendor, would you then bill that time to the committee?

A Yes.

Q What would Mr. Romanin do? Was he acting in a volunteer capacity for the committee whereby he would let's say not be paid by MediAmerica because he was acting as a committee person and yet not be paid by the committee?

A I don't --

Q That is a tough one, I know. The reason I ask that, I am curious. You talked about how Mr. Romanin seemed to be functioning as a committee functionary, whereas you would conduct the business for the vendor. You appear to be saying, and correct me if I am wrong, that time you would spend at work discussing with Romanin would be part of the services provided by MediAmerica to the committee; hence, billable to the committee. Now Mr. Romanin, functioning for the committee, was he then not paid by MediAmerica for that time? Was pay withheld?

A I really am kind of lost with the question.

Q Let me try to recreate it once more. I will make an

1 attempt.

2 You and Mr. Romanin are having a discussion. You have

3 testified before that Mr. Romanin was operating as a committee

4 functionary; is that correct?

5 A Yes. He was the treasurer, I believe.

6 Q You in these discussions would be operating as the

7 vendor, in what you perceived to be a business relationship,

8 when you were discussing committee affairs with Mr. Romanin;

9 is that correct?

10 A Yes.

11 Q Then we have established that -- or we may not have,

12 and I want to get that clear -- that that time that you spent

13 discussing the committee with Mr. Romanin was time spent by

14 MediAmerica that could be billed to the committee, let's

15 say as a consultant?

16 Was that a yes?

17 A I just thought it was. Are you saying do I

18 understand what you are saying? I think I understand what

19 you are saying up to this point, yes.

20 Q Is that correct, that is what your testimony has

21 been?

22 A For the most part, yes.

1 Q The fourth step. Mr. Romanin, discussing with
2 you as a functionary of the committee and not as an employee
3 for MediAmerica at that point, but on company time, would pay
4 be withheld from him for the time spent as a functionary for
5 the committee and/or would he be paid by the committee for time
6 spent working for the committee?
7 A The best of my knowledge, everything he put in on
8 the committee as really kind of as a volunteer, on a volunteer
9 basis.
10 Q But was pay withheld by MediAmerica for his work
11 during office hours for the committee?
12 A I don't believe he really put any time in on the
13 committee during office hours.
14 Q What about in the form of discussions with you?
15 A I don't -- you know, you are asking me for -- I don't
16 really know.
17 Q Who made the decisions, prior to your reference to
18 advice of counsel, who made the decisions as to the
19 committee's payment of the debt to MediAmerica? Would you
20 make the decision that the committee should pay the debt or
21 would Mr. Romanin make the decision?
22 A I believe Mr. Romanin did.

1 Q Did you have any discussion about that?

2 A Probably not.

3 MR. LEVIN: Let's take a two-minute break.

4 (Brief recess.)

5 MR. LEVIN: Back on the record.

6 We are going to be wrapping up soon.

7 I am asking the reporter to mark this as FEC

8 Exhibit No. 13.

9 (The document entitled "Medi-

10 America, Inc., Financial

11 Statements, December 31, 1979"

12 was marked FEC Exhibit 13 for

13 identification, a copy of which

14 is attached to the court copy of

15 this deposition.)

16 MR. LEVIN: I am showing FEC Exhibit No. 13 to

17 witness and counsel.

18 MR. SPARKS: All right.

19 BY MR. LEVIN:

20 Q Can you identify FEC Exhibit No. 13?

21 A Yes.

22 Q What is it?

A It is a year-end statement. It appears to be a year-end statement from Wallace Brill, the CPA of the company at the time.

3 3 0 4 0 4 0 5 3 1 7

Q I would like to refer you to the last page of this document and the line item "net income." Is the net income for 1980 similar to the net income for 1979?

A No.

Q How does it compare?

MR. SPARKS: First of all, we don't have a financial statement for the year-end of 1980.

MR. LEVIN: I would think that the president of the company might have an idea.

MR. SPARKS: Maybe you could ask him whether or not he has such a recollection.

BY MR. LEVIN:

Q Do you have such a recollection?

A I would really have to see them right before me. I haven't looked at these statements for an awful long time.

Q Did you have anything else to say on that?

A No.

Q Would you say that the 1980 results are comparable to the 1979 results?

MR. SPARKS: That is the same thing, asked in a different form.

BY MR. LEVIN:

Q Do you recall whether you did better or worse than this?

A Oh, we did better.

Q For which year, 1980?

A As I recall, this is only for a short period of time, three months or something.

Q This is the year-end, earnings for the year, according to the second page.

A Yes. Well, the company was just formed, as I recall.

MR. SPARKS: It is confusing. The second page says for year-end December 31, 1979 but it is dated May 26, 1979.

MR. LEVIN: Where is it dated?

MR. SPARKS: Second page of the exhibit.

THE WITNESS: I didn't notice that.

BY MR. LEVIN:

Q Were you aware in 1980 that this had been your profit for 1979?

A If that is what the document says, yes.

Q Did it not seem curious to you that with a committee owing you $14,000 in debt

that the committee would go out and spend $5,000

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1 contributing to candidates?

2 A As an employee of MediAmerica, I am always concerned

3 again about any organization that owes money to the company.

4 But I believe, as I stated earlier, that Mr. Romanin made those

5 decisions and I wasn't, you know, over it.

6 Q You weren't what?

7 A I don't remember being over it or I don't -- I believe

8 he made those decisions.

9 Q You didn't question him to say, "This seems a little

10 extravagant in light of the fact that the committee owes so

11 much money to MediAmerica"?

12 A No, I don't believe I ever did.

13 Q Did you have any discussion as to that?

14 A I don't believe I ever did, to be honest with you.

15 Q Did the committee make rent payments for the

16 facilities that they used?

17 A Yes.

18 Q Did they make them to the landlord or to MediAmerica?

19 A I believe they made them to the landlord.

20 Q Was the landlord apprised of this arrangement?

21 A I am sure they were, yes.

22 Q Were those moneys subtracted from the -- well, let's

8 3 0 4 0 4 0 5 3 2 6

ask it this way: The total rent that was paid by MediAmerica and the committee, did that equal the total rent that would have been paid by MediAmerica had not the committee been there?

A I assume it was, yeah.

MR. SPARKS: If not, I would like to be the landlord.

THE WITNESS: Yeah, that is right.

MR. LEVIN: I have no further questions right now.

MR. SPARKS: What does right now mean?

MR. LEVIN: I just want to say at the end the deposition will merely be adjourned. It will not be terminated. The witness will still be under subpoena.

MR. SPARKS: I know that is always the Commission's view.

MR. LEVIN: Okay.

MR. SPARKS: May I now ask some questions?

MR. LEVIN: Sure.

EXAMINATION BY COUNSEL FOR THE WITNESS

BY MR. SPARKS:

Q Mr. Geske, to your recollection, during what time period, over what length of time did the National Candidates' Committee, Conservative Candidates Committee, actually function, raise funds and distribute funds, roughly, from when to when?

A Whenever the FEC reports say. Exact dates I don't know.

Q I understand that. Was it over a period of several months?

A I would say that is accurate.

Q During the course of its operation, approximately how many discussions did you have with Mr. Romanin about its operation?

A Two, three; very minimal.

Q Approximately how much time did those several conversations comprise?

A Minutes, literally minutes.

Q You are president of MediAmerica, are you not?

A Yes, I am.

Q As such, did you make efforts to ensure that services which MediAmerica rendered to the Candidates' Committee were billed to the Candidates' Committee?

A The very best of my ability, yes.

Q To your knowledge, as we speak today, were those services which were rendered to the committee billed to the committee?

A Oh, yes. I believe all of them were, unless an

8 3 0 4 0 4 0 5 3 2 2

error was made.

Q Have some of those bills been paid?

A Yes.

Q Earlier you testified that FEC Exhibit 4, which consists of four invoices from MediAmerica to the committee, does not reflect any bills for the list used in the October 25 mailing.

A Yes.

Q Do you have any idea why that is so?

A I would just assume that it was an error. It should have been billed.

Q With respect to the December 5 mailing, do you know if the list used in that mailing was ever billed to the committee?

A According to the invoice, no. But it could have been the first list that wasn't picked up. But again, if it was a separate list, yes, it should have been billed.

Q With respect to FEC 4, page two thereof, invoice 10 upon MediAmerica's letterhead, is that an invoice for a list of mailings?

A No.

Q What is it?

8 3 0 4 0 4 0 5 3 2 2

A It is an invoice for production services basically.

Q For the services rendered in connection with the mailing?

A Yes.

Q But in any of the documents which have been produced today is there an invoice for the cost of the list which was used in any mailings on behalf of the committee?

A No, not that I have seen.

Q When MediAmerica does mailings for other clients, is the cost of the list used billed to the client?

A Sometimes it is. Sometimes it isn't.

Q When would it not be?

A When the client provides the list himself.

Q Were the mailings on behalf of the committee an arrangement like that? Did the committee provide its own list?

A I would have to say yes.

Q Why would you have to say yes?

A Well, only insofar as John Romanin was going to get the lists.

Q John Romanin in your view was the committee, or at least a representative of the committee?

A Oh, yes. In that capacity, yes.

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Q Would that explain why there are no invoices from MediAmerica to the committee?

A Yes, it could very well.

Q You earlier testified -- and I have forgotten her first name -- Shirley King made decisions herself as to when she was working for MediAmerica for the caging and batching activities. Do you wish to clarify or expand on your earlier testimony and when she was working for the committee?

A Yes, I do. As an employee of MediAmerica, Mrs. King had specific functions and was instructed to do them during office hours. When she did any work that was related to the Candidates' Committee in her capacity as a MediAmerica employee, she should have and I do believe was instructed to make sure she kept track of it and billed it properly.

Q Do you know whether or not she in fact did that? Do you know of your own knowledge?

A Absolutely, no. I assume she did what she was told, as an employee of MediAmerica.

MR. SPARKS: I don't have any other questions.

MR. LEVIN: Just one question.

FURTHER EXAMINATION BY COUNSEL FOR THE FEDERAL ELECTION COMMISSION

BY MR. LEVIN:

Q Where did Mr. Romanin get his list that he was providing for the committee?

A I don't know. I didn't ask him.

Q You never discussed that with him?

A No, not that I recall anyway.

Q But you know it wasn't the MediAmerica list?

A What MediAmerica list?

Q You know it was not a list provided --

A It was not a list that I personally went out to the market, as I would in some cases, and buy it and then rent it. I don't remember ever doing that for the Candidates' Committee, no.

Q But could it have been a list provided through MediAmerica as a result of MediAmerica's services to its other clients?

A I don't think so.

Q Why not?

A Well, because the lists are proprietary information.

Q So if Mr. Romanin had been taking lists from the

records of your company's transactions with other clients, he would have been violating the agreements?

A He would have been fired from MediAmerica as an employee.

Q I imagine that is a yes.

(Witness and counsel conferring.)

BY MR. LEVIN:

Q Mr. Geske, you seem to indicate that Mr. Romanin was pretty much operating the committee; is that correct?

A Yes.

Q When a company such as MediAmerica produces -- let me just refer you to FEC Exhibit 4 again. This won't take much longer. I want to refer you to the second page. You have these Urgentgrams. Regardless of whether Mr. Romanin was running the committee or not, when a company such as yours produces an Urgentgram, in this case did they do that from a computer-generated list? In other words, you have computer data there?

A I would assume so on this, yes.

Q Wouldn't you know about such a list at such a cost? There are a lot of names there, at 50 cents a unit.

A Not necessarily.

MR. SPARKS: What do you mean when you say know about?

MR. LEVIN: It is a large list of names. He is the president.

MR. SPARKS: I am not in the industry really, but in any event, 12,000 is maybe not a large number.

MR. LEVIN: If that is the answer, if that isn't unusual, I would like that explained, too.

MR. SPARKS: Let Mr. Geske explain.

MR. LEVIN: Exactly.

THE WITNESS: What is your question?

BY MR. LEVIN:

Q Would you not be cognizant of such a large list of names?

A Not necessarily.

MR. SPARKS: What do you mean cognizant of?

THE WITNESS: This is not a large list of names by any shape of the imagination.

(Witness and counsel conferring.)

BY MR. LEVIN:

Q Would a client, such as this committee, be able to put its own list of names into the computer that would be this large without having you know about it?

A Well, again, this is not a large list by any shape

of the imagination.

Q Okay. Then this size.

A This is incidental.

MR. SPARKS: Excuse me. I think there is a misconception. I think that is why we are not getting an answer. You have said would a client be able to put these names on a computer.

MR. LEVIN: Yes.

MR. SPARKS: You asked if the Urgentgrams were computer-generated. The answer was yes. I took that to mean that it was printed, that the Urgentgrams were printed by a computer.

MR. LEVIN: Okay.

BY MR. LEVIN:

Q The names, the people, the list of names, the people to whom the Urgentgram was sent, we have on there 12,245 Urgentgrams, so apparently there was a list of 12,245 names. Now, if a client came in and put this many names into your computer, wouldn't you know that? I mean, these aren't names that your --

MR. SPARKS: Again, there is just a misunderstanding of how the industry works. A client would either deliver it

1 directly to MediAmerica or to MediAmerica's computer house a
2 spool containing the names. That spool would be attached to
3 the computer. It would in turn spit out names on each of
4 12,245 Urgentgrams, and the spool would be returned to the client
5 or its agent.
6 MR. LEVIN: Okay.
7 MR. SPARKS: It is not a question of putting names
8 into a computer.
9 MR. LEVIN: Right, okay.
10 BY MR. LEVIN:
11 Q Isn't that something you would normally know about?
12 A Not necessarily.
13 Q How many clients do this, put their own names in?
14 A Well, again, the procedure is a little bit different
15 than as I understand you are defining it. Names or client
16 materials or lists may arrive in any format. They could be,
17 you know, a 4-UP Cheshire level, a pressure-sensitive level,
18 a nine-track tape, eight-track, a discette. They are then
19 mounted on the system and prepared for a mail date by Medi-
20 America personnel.
21 Q How many clients come in with their own names as
22 opposed to the same?

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MR. SPARKS: Almost all of them.

THE WITNESS: Oh, many. I guess almost all of them. I guess almost all of them, yeah.

MR. LEVIN: I have no further questions.

MR. SPARKS: I have none.

MR. LEVIN: Just a procedural point I made before. I didn't mean to stop you from asking questions. I was merely explaining why I said "at this point."

For the record, this deposition is adjourned. It is not terminated. So you are still under subpoena.

THE WITNESS: Okay.

(I have read the foregoing pages 4 through 130, inclusive, which contain a correct transcript of the answers given by me to the questions therein recorded.)

_____

D. RICHARD GESKE

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CERTIFICATE OF NOTARY PUBLIC

I, Karen Hinnenkamp, the officer before whom the foregoing deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken by me in shorthand and thereafter reduced to typewriting by me; that said deposition is a true record of the testimony given by said witness; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken; and further that I am not a relative or employee of any attorney or counsel employed by the parties thereto, nor financially or otherwise interested in the outcome of the action.

Karen Hinnenkamp
Notary Public in and for
the District of Columbia

My commission expires:

July 31, 1983

(4d)

8 3 0 4 0 4 3 5 3 3

First Meeting

400 N. Brunswick
Suite 12A

August 18, 1980

- Committee Mailing -

1.A. Initial budget 8,800.00 —

1. Mail date 1st prospect
(A) Week of Sept. -

2. Lists - IDR will compile to 10M for first Mailing

3. Lists of people to request $ from in order the pay for first Mailing

| | | |
|---|---|---|
| 1) | John Dolan - | 100.00 |
| 2) | Gabe | 50 |
| 3) | IDR | 50 |
| 4) | RKS | 50 |
| 5) | Hartlays | 100.00 |
| 6) | Romaine | 100.00 |
| 7) | Gail Webber (California) | 100.00 |
| 8) | Fox Lowry | 100.00 |
| 9) | ~~Dorothy Fitch~~ | ~~100.00~~ |
| 10) | Ken Carpenter | 100.00 |
| 11) | Dave Holland | 100.00 |
| 12. | Darlene | 100.00 |
| 13) | Paul Moriarty | 100.00 |
| 14) | Dan Smedley (bldg management) | 25.00 |
| 15) | Gen. Roberts | 25.00 |
| 16) | I.D. Young (Romaine's friend) | 50.00 |
| 17. | T.R. Young | 100.00 |
| 18. | Rudy Peal | 25.00 |
| 19. | Mrs Kelly | 25.00 |
| 20. | Clubhouse | 100.00 |

FEC Ex. 1
KH 5-24-82

Call. Rhonda call 5 people different for 50-100 - Send Cards.

URGENTGRAM SERVICE
ALEXANDRIA, VA. 22

urgentgram

4-012763J2682001 10/25/80 SCI IPNNACC CSP FSCFI
1 703998567 UGM TDMA ALEXANDRIA VA 10-25 0800P EST

Mrs. Carol Reed
Americans For Change
218 North Lee St., #218
Alexandria, Virginia 22314

THE FOLLOWING MESSAGE IS TRANSMITTED FROM:

703998567 UGM ALEXANDRIA VA 26 10-25 0800P EST
ZIP

JOHN D. ROMANIN
NATIONAL FINANCE DIRECTOR
NATIONAL REPUBLICAN CAND. COMM.
1900 NORTH BEAUREGARD ST
ALEXANDRIA VA 22311

NEED YOUR HELP IMMEDIATELY! LEAD IN POLLS IS EVAPORATING. CARTER VICIOUSLY ATTACKING REAGAN. GOOD CONSERVATIVES REAGAN NEEDS IN SENATE AND HOUSE OF REPRESENTATIVES SUFFERING FROM BACKLASH OF CARTER ATTACKS. BIG MEDIA AND TELEVISION NETWORKS STEPPING UP ANTI-REAGAN PROPAGANDA. POWERFUL BIG LABOR UNIONS PUMPING MILLIONS INTO LIBERAL CAMPAIGNS DURING FINAL DAYS OF ELECTION. MUST PULL OUT ALL STOPS IN REMAINING FINAL HOURS TO PREVENT DEFEAT. PLEASE SEND MAXIMUM EMERGENCY CONTRIBUTION RIGHT AWAY. NO CONTRIBUTION IS TOO SMALL. CAN'T LET CARTER AND BIG LABOR BOSSES STEAL THIS ELECTION AWAY FROM CONSERVATIVES. PLEASE SEND CHECK NOW FOR ELEVENTH HOUR VICTORY EFFORTS. LAST PUSH TO WIN IN FULL SWING. NO SECOND CHANCE AT THIS LATE DATE. ITS WIN OR LOSE NOW. PLEASE HELP. PLEASE HELP. MAKE YOUR CHECK PAYABLE TO: NATIONAL REPUBLICAN CANDIDATE COMMITTEE. PLEASE SEND TODAY.

0800 EST

UGMCOMP UGM

***** REFOLD ENTIRE URGENTGRAM AND RETURN WITH CHECK ENCLOSED IN SPECIALLY MARKED ENVELOPE.

FEC Ex. 2
KH 5-24-82

TO REPLY BY URGENTGRAM, CALL (703) 998-0338

9304053334

4(a) and 4(b)

AMERICA

Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 998-0334

National Republicans Candidates
Committee
1900 N. Beauregard St., Ste. 12
Alexandria, VA. 22311

October 27, 1980

Job #0037 Invoice #758

Production and mailing services. Total count 8778 Urgent Grams. Drop date 10/25 & 10/26/80.

| | |
|---|---|
| Production: | |
| 8778 @ .50/each | $ 4,389.00 |
| Set-up | 10.00 |
| Printing: | |
| BRE #9 Blue (15K) | 569.82 |
| Carrier Window (15K) | 636.00 |
| Live stamp application | 50.00 |
| Stamp/Spoilage | 17.00 |
| Postage for 8778 | 2,633.40 |
| Total Due | $8,305.92 |

All invoices are due and payable upon receipt. All charges are payable 20 days from date of invoice. A service charge of 1.5% per month (equivalent to 18% per year) will be added to past due items.

FEC Ex. 4
KH 5-24-82

# MEDIAMERICA

Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

INVOICE
000010

All charges are payable 30 days from date of invoice A SERVICE CHARGE of 1.5% per month (equivalent to 18% per year) will be added to past due items.

National Republican Candidates Committee
1900 North Beauregard Street, #12
Alexandria, Virginia 22311

| Account Number |
|---|
| |

Job #0090

PURCHASE ORDER NO.

Please Send One Copy With Remittance

| DATE | INVOICE NUMBER | DESCRIPTION | AMOUNT |
|---|---|---|---|
| 12/12/80 | | Composition/Production of 12,245 UrgentGrams. Drop date - December 5, 1980. | |
| | | -Copy Creative Fee | $ 1,000.00 |
| | | -UrgentGram @ .50/unit | 6,122.50 |
| | | -Printing - Envelopes 20K Blue Wove Black Ink | 584.35 |
| | | -Postage (.15 each) | 1,836.75 |
| | | TOTAL DUE | $ 9,543.60 |
| | | Paid on Account 1/10/81 - Ck. #116 | 2,000.00 |
| | | BALANCE DUE | $ 7,543.60 |

Claims for defects, damages or shortages must be made in writing within a period of ten (10) days after delivery.

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

November 18, 1980

National Republican
Candidates' Committee
1900 N. Beauregard St.
Alexandria, VA 22311

Invoice # 772

Reimbursement for services rendered by MediaAmerica for November, 1980.

| | |
|---|---|
| Secretarial Receptionist, General Office: | |
| J. Kanak (Caging/Batching/Zeroxing) work-up for stationery 17 hr at 5.49/hr. | $ 92.00 |
| B. Wheeler (Caging/Batching,verification 35 hr at 4.00/hr. | 140.00 |
| A. Gosain/Filing/general office 7 hr at 4.00/hr. | 28.00 |
| Keypunch & Verify Contributors List | 100.00 |
| Accounting: | |
| S. King (28 hrs at 8.24/hr.) Caging, Batching, Bank Deposits FEC report, Organizing Files. | 198.00 |
| Xerox Machine: Copies,Supplies. | 70.00 |
| IBM Typewriter, File Cabinet, Desk, Desk Chair. | 150.00 |
| Answering Telephone ($40/wk: 11-4-80/11-30-80) | 140.00 |
| Administrative (S. King 10 hrs at 8.24) Chart of Accounts/Opening Bank Accounts | 82.00 |
| TOTAL | $1,000.00 |

Paid

83040053337

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

November 26, 1980

National Republican
Candidates' Committee
1900 N. Beauregard St.
Alexandria, VA 22311

Invoice # 776

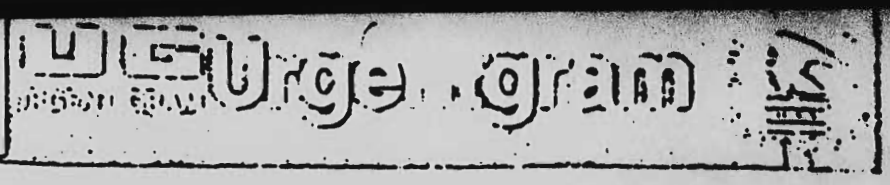
Reimbursement of services rendered by MediaAmerica for December, 1980.

| | |
|---|---|
| **Secretarial Receptionist:** | |
| Answering telephone(40/week:12/1-12/31) | $ 160.00 |
| Anita Gosain-general office-set-up files (37.5 hr x 4) | 150.00 |
| Filing at 4hr x 4.00 | 16.00 |
| **Supplies:** | |
| 5 Boxes file folders at($15/each) | 75.00 |
| 2 Boxes letter size folders($12/each) | 24.00 |
| 3 Packages of red tabs($3/each) | 9.00 |
| 1 Package of white tabs | 1.50 |
| 1 Accounting check holder | 18.00 |
| **Keypunch**: Contributors and verify | 120.00 |
| **Xerox Machine**: Copies and supplies | 70.00 |
| **IBM Typewriter**, File Cabinet, Desk & Desk Chair | 150.00 |
| **Accounting & General Office:** | |
| S. King (8.24 x 33 hours) | |
| FEC Report | |
| Caging and batching | |
| Bank deposits | 271.00 |
| TOTAL | $ 1,064.50 |

Paid

830405336

NATIONAL URGENTGRAM SERVICE CENTER
1900 N. BEAUREGARD ST. #12
ALEXANDRIA, VA. 22311



##### 4-0]2453 J 234]]2 12/5/80 SIC CPS FSCFI
1 7039980334 UGM TDMA ALEXANDRIA VA 12/5 0900 EST

Mr. ronald Davis
3129 S. 14th St.
Arlington, VA 22204

THE FOLLOWING MESSAGE IS TRANSMITTED FROM: NATIONAL REPUBLICAN CANDIDATE'S COMMITTEE..... JOHN D. ROMANIN.....NATIONAL FINANCE CHAIRMAN..... 0900 EST 12/5

ON BEHALF OF PRESIDENT-ELECT RONALD REAGAN AND MYSELF, THANK YOU! ..... Mr. Davis, MAKE NO MISTAKE ABOUT IT..... RONALD REAGAN IS PRESIDENT BECAUSE OF YOUR BELIEF IN THE MAN AND THE PRINCIPLES HE REPRESENTS AND BECAUSE OF YOUR ENDURING SUPPORT.....I ALSO WANT TO EXTEND MY PERSONAL GRATITUDE TO YOU FOR HELPING ELECT A REPUBLICAN MAJORITY TO THE U. S. SENATE..... IT'S THE FIRST TIME IN OVER 26 YEARS REPUBLICANS HAVE CONTROLLED THE "UPPER CHAMBER"..... THIS VICTORY IS EVEN MORE GRATIFYING BECAUSE MANY GOOD CONSERVATIVES LIKE SENATORS THURMOND, HATCH AND GARN WILL BECOME CHAIRMEN OF VERY POWERFUL COMMITTEES..... ADDITIONALLY, OUTSTANDING CANDIDATES LIKE STEVE SYMMS FROM IDAHO AND PAULA HAWKINS FROM FLORIDA WILL GREATLY INCREASE OUR STRENGTH IN THE SENATE..... NONE OF THESE GAINS COULD HAVE BEEN POSSIBLE WITHOUT YOUR PERSONAL COMMITMENT..... BUT NOW I MUST TURN MY ATTENTION TO HELPING THESE NEWLY ELECTED "REAGAN" SENATORS AND CONGRESSMEN..... COMBINED, THEY HAVE CAMPAIGN DEBTS TOTALING $1.2 MILLION...THEY REALLY DESERVE HELP...MANY CAMPAIGNED 16-18 HOURS A DAY FOR MONTHS BEFORE THE ELECTION SO AS NOT TO LET US DOWN..... AND IN THE RACES THAT WERE TOO CLOSE TO CALL, I URGED EACH CANDIDATE TO SPEND A MINIMUM OF $50,000 ON LAST MINUTE TV AND RADIO ADVERTISEMENTS WITH MY PROMISE TO HELP THEM AFTER THE ELECTIONS..... I KNEW THAT IN A CLOSE RACE, HEAVY TV AND RADIO SATURATION WOULD PUSH THEM OVER THE TOP..... MY STRATEGY WORKED BUT CAMPAIGNS HAD TO GO INTO DEBT..... WITH MASSIVE DEBTS NOW HANGING OVER THEIR HEADS THEY CAN'T CONCENTRATE ON THEIR WORK..... MORE IMPORTANTLY, NEW CONSERVATIVES WITH LARGE DEBTS BECOME A PRIME TARGET OF WEALTHY LIBERALS AND POWERFUL LABOR UNIONS WHO HAVE SWORN "TO GET EVEN"..... PLEASE HELP ME KEEP MY PROMISE TO HELP THESE GOOD CONSERVATIVES PAY OFF THEIR DEBTS..... Mr. Davis, WON'T YOU SEND THE NAT. REP. CANDIDATE'S COMM. $50 OR PERHAPS $100 OR MORE SO THAT I DON'T HAVE TO BREAK MY PROMISES TO THEM..... I APOLOGIZE FOR NOT CONSULTING WITH YOU BEFORE ADVISING OUR CANDIDATES TO GO INTO DEBT IN ORDER TO WIN, BUT THERE WASN'T ANY TIME TO CONTACT YOU IN THE REMAINING DAYS OF THE ELECTION.... I HOPE YOU'LL FORGIVE ME AND HELP THE COMMITTEE NOW BY SENDING AS GENEROUS A CONTRIBUTION AS POSSIBLE..... GOD BLESS.....

0900 P EST JOHN. D. ROMANIN..... NATIONAL FINANCE CHAIRMAN

****** PLEASE REFOLD ENTIRE URGENTGRAM AND RETURN WITH CHECK IN ENCLOSED ENVELOPE - MAKE CHECK PAYABLE TO NATIONAL REPUBLICAN CANDIDATE'S COMMITTEE.******

FEC Ex 5

KA 5-24-82

TO REPLY BY URGENTGRAM CALL URGENTGRAM AT [illegible]

245-5023

UNITED STATES POSTAL SERVICE
475 L'Enfant Plaza, SW
Washington, DC 20260

DEC 12 1980

Media America
1900 N. Beauregard St., #12
Alexandria, Virginia 22311

Dear Sir or Madam:

It has come to our attention that your "Urgentgram" mailing envelopes include an altered eagle logotype, obviously copied from the U.S. Postal Service seal and emblem. You are advised that affixing such altered seal to paper is a criminal violation carrying a fine of up to $5,000, imprisonment for up to 5 years, or both. 18 U.S.C. §506.

The Postal Service emblem, in addition to being the official seal of the Postal Service, is also its registered trademark and service mark, Registration No. 975,033. As I am sure you are aware, a trademark owner must take the actions necessary to assure that its marks are not misused.

Because of the seriousness with which we consider this matter, we must require the unequivocable written assurance that you will cease all use of the Postal Service emblem or any imitation thereof.

Sincerely,

T. Major

Theodore Major
Patent Counsel

FEC Ex. 6
KH 5-24-82

8 3 0 4 0 4 0 5 3 1 0

UNITED STATES POSTAL SERVICE
475 L'Enfant Plaza, SW
Washington, DC 20260

JAN 21 1981

Media America
1900 N. Beauregard St., #12
Alexandria, Virginia 22311

Dear Sir or Madam:

On December 12, 1980 we wrote to you asking that you cease the use of the altered eagle logotype which is the seal and emblem of the United States Postal Service and our registered trademark/service mark, Registration No. 975,033. You have not yet responded.

Since that time we have been informed of your continued, widespread violation of both the Criminal Code, Section 506 of Title 18 of the United States Code and of our property rights in the United States Postal Service emblem trademark, Registration No. 975,033.

You are hereby advised that if we do not have your unequivocable written assurance within 10 days of the date of this letter that you are ceasing all use of the Postal Service emblem, any imitation or alteration of the emblem, the Department of Justice will be provided with the necessary information to take immediate steps to enforce both the criminal and civil violations.

Respectfully,

T. Major

Theodore Major
Patent Counsel

FEC Ex. 7
KA 5-24-82

83040053341

AMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 998-0334

January 23, 1981

Theodore Major
Patent Counsel
United States Postal Service
475 L'Enfant Plaza, S.W.
Washington, D.C. 20260

Dear Mr. Major:

As per my telephone conversation of this date and your correspondence dated December 12, 1980 and January 21, 1981, please be advised that you have my unequivocable assurance that MediAmerica has ceased using all envelopes in question.

In fact, upon receipt of your first letter dated December 12, 1980, I took immediate action to comply with your request by cancelling all pending orders. Additionally, I directed the supervisor in charge of our mailing center to immediately discontinue the use of any of these forms and envelopes that remained in stock.

On this same date however, it came to my attention that some remaining overage was inadvertently used. To prevent this error from re-occuring, I have taken the precaution of ordering this stock destroyed.

MediAmerica printed "Urgentgram" envelopes and forms for direct mail solicitations with the hope of better serving our clients by increasing their response rates. At no time was the design of the package thought to violate any ordinance, law, patent, trademark, or federal code, hence the modifications in the eagle emblem and the use of the word "Urgentgram".

Thank you, Mr. Major, for being so courteous and helpful, and please be assured that you have my complete and earnest cooperation in this matter.

Sincerely,

D. Richard Geske

RG/ckt

FEC Ex 8

KH 5-24-82

8 3 0 4 0 4 0 5 3 4 2

STEVE SYMMS
IDAHO

# United States Senate

WASHINGTON, D.C. 20510

March 30,1981

Mr.Richard Geske
National Candidates Committee
1900 N. Beauregard Street
Alexandria, Virginia 22311

Dear Mr. Geske:

This is in response to your request for clarification as to the use of my name in your Committee's December 5th fundraising solicitation.

As you aware, I was not asked if my name could be used in this solicitation, and therefore, did not authorize such use in advance.

Please be informed that although I was not aware of the use of my name in your letter, I personally have no objection at this time. Had your Committee requested the use of my name I would have seriously considered such a request and most likely would have engaged in the fundraising effort.

I appreciated the contribution received by my own Campaign Committee and look forward to your continuing support in the future.

Best regards.

Sincerely,

Steve Symms

Steve Symms
United States Senator

SS:att

83040405343

FEC Ex 9
KH 5-24-82

# REPORT OF RECEIPTS AND DISBURSEMENTS
## For a Political Committee Other Than an Authorized Committee

(Summary Page)

1. Name of Committee (In Full)

NATIONAL REPUBLICAN CANDIDATES COMMITTEE

Address (Number and Street)

1900 N. Beauregard Street #12

City, State and ZIP Code

Alexandria, Virginia 22311

☐ Check if address is different than previously reported.

2. FEC Identification Number

C00130682

3. ☒ This committee qualified as a multicandidate committee during this Reporting Period on 12/31/80 (date)

4. TYPE OF REPORT (check appropriate boxes)

(a)
- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☒ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Monthly Report for _____
- ☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
- ☐ Thirtieth day report following the General Election on _____ in the State of _____
- ☐ Termination Report

(b) Is this Report an Amendment? ☐ YES ☒ NO

| SUMMARY | Column A This Period | Column B Calendar Year-to-Date |
|---|---|---|
| 5. Covering Period 11/25/80 Through 12/31/80 | | |
| 6. (a) Cash on Hand January 1, 19___ | | $ |
| (b) Cash on Hand at Beginning of Reporting Period | $ 10,007.19 | |
| (c) Total Receipts (from Line 18) | $ 6,791.50 | $ 16,905.00 |
| (d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B) | $ 16,798.69 | $ 16,905.00 |
| 7. Total Disbursements (from Line 28) | $ 10,997.21 | $ 11,103.52 |
| 8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) | $ 5,801.48 | $ 5,801.48 |
| 9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D) | $ -- | |
| 10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D) | $ 14,349.62 | |

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

John D. Romanin
Type or Print Name of Treasurer

SIGNATURE OF TREASURER

12/31/80
Date

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g

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

FEC FORM 3X (3/80)

FEC Ex 10 KA 5-24-82

## DETAILED SUMMARY PAGE
## of Receipts and Disbursements
## (Page 2, FEC FORM 3X)

Name of Committee (In Full): NATIONAL REPUBLICAN CANDIDATES COMMITTEE

Report Covering the Period: From: 11/25/80 To: 12/31/80

| | COLUMN A Total This Period | COLUMN B Calendar Year-to-Date |
|---|---|---|
| **I. RECEIPTS** | | |
| 11 CONTRIBUTIONS (other than loans) FROM: | | |
| (a) Individuals/Persons Other Than Political Committees | 6,897.81 | 16,905.00 |
| (Memo Entry Unitemized $ ) | | |
| (b) Political Party Committees | -- | -- |
| (c) Other Political Committees | -- | -- |
| (d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c) | 6,897.81 | 16,905.00 |
| 12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES | -- | -- |
| 13. ALL LOANS RECEIVED | -- | -- |
| 14. LOAN REPAYMENTS RECEIVED | -- | -- |
| 15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.) | -- | -- |
| 16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES | -- | -- |
| 17. OTHER RECEIPTS (Dividends, Interest, etc.) | -- | -- |
| 18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17) | 6,897.81 | 16,905.00 |
| **II. DISBURSEMENTS** | | |
| 19. OPERATING EXPENDITURES | 5,997.21 | 6,103.52 |
| 20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES | -- | -- |
| 21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES | 5,000.00 | 5,000.00 |
| 22. INDEPENDENT EXPENDITURES (Use Schedule E) | -- | -- |
| 23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F) | -- | -- |
| 24. LOAN REPAYMENTS MADE | -- | -- |
| 25. LOANS MADE | -- | -- |
| 26. REFUNDS OF CONTRIBUTIONS TO: | | |
| (a) Individuals/Persons Other Than Political Committees | -- | -- |
| (b) Political Party Committees | -- | -- |
| (c) Other Political Committees | -- | -- |
| (d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c) | -- | -- |
| 27. OTHER DISBURSEMENTS | -- | -- |
| 28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27) | 10,997.21 | 11,103.52 |
| **III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES** | | |
| 29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d | 6,897.81 | 16,905.00 |
| 30. TOTAL CONTRIBUTION REFUNDS from Line 26d | -- | -- |
| 31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29) | 6,897.81 | 16,905.00 |
| 32. TOTAL OPERATING EXPENDITURES from Line 19 | 5,997.21 | 6,103.52 |
| 33. OFFSETS TO OPERATING EXPENDITURES from Line 15 | -- | -- |
| 34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32) | 5,997.21 | 6,103.52 |

SCHEDULE B

# ITEMIZED DISBURSEMENTS

Page 1 of 2 for
LINE NUMBER 21
(Use separate schedule(s) for each category of the Detailed Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (In Full)
NATIONAL REPUBLICAN CANDIDATES COMMITTEE

| A. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement This Period |
|---|---|---|---|
| Symms for Senate<br>P. O. Box 471<br>Boise, Idaho 83701 | Contribution (Agg. 500.00)<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 12/29/80 | 500.00 |
| B. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement This Period |
| Hawkins for Senate<br>P.O. Box 12637<br>Tallahassee, FL 32308 | Contribution (Aggr. 500.00)<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 12/29/80 | 500.00 |
| C. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement This Period |
| McCollum for Congress<br>P. O. Box 732<br>Altamonte Springs, FL | Contribution (Aggr. 500.00)<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 12/29/80 | 500.00 |
| D. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement This Period |
| Carman for Congress<br>266 Main Street<br>Farmington, N. Y. 11735 | Contribution (Aggr. 500.00)<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 12/29/80 | 500.00 |
| E. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement This Period |
| Grassley for Senate<br>P. O. Box 1000<br>Des Moines, IA 50306 | Contribution (Aggr. 500.00)<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 12/29/80 | 500.00 |
| F. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement This Period |
| Mattingly for Senate<br>P. O. Box 1980<br>Atlanta, GA 30301 | Contribution (Aggr. 500.00)<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 12/29/80 | 500.00 |
| G. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement This Period |
| D'Amato for Senate<br>1697 Broadway<br>New York, N. Y. 10019 | Contribution (Aggr. 500.00)<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 12/29/80 | 500.00 |
| H. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement This Period |
| Hunter for Congress<br>2309-1/2 National Avenue<br>San Diego, CA 92113 | Contribution (Aggr. 500.00)<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 12/29/80 | 500.00 |
| I. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement This Period |
| Molinari for Congress<br>1720 Hylan Boulevard<br>Staten Island, N.Y. 10304 | Contribution (Aggr. 500.00)<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 12/29/80 | 500.00 |
| SUBTOTAL of Disbursements This Page (optional) | | | 4,500.00 |
| TOTAL This Period (use page this line number only) | | | |

SCHEDULE B

# ITEMIZED DISBURSEMENTS

Page 2 of 2 for
LINE NUMBER 21
(Use separate schedule(s) for each category of the Detailed Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)
NATIONAL REPUBLICAN CANDIDATES COMMITTEE

| | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement This Period |
|---|---|---|---|
| A. Full Name, Mailing Address and ZIP Code<br>LeBoutillier for Cong<br>202 Winthrop<br>Westbury, N.Y. 11590 | Contribution (Aggr. 500.00)<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 12/29/80 | 500.00 |
| B. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| C. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| D. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| E. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| F. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| G. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| H. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| I. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| SUBTOTAL of Disbursements This Page (optional) | | | 500.00 |
| TOTAL This Period (last page this line number only) | | | 5,000.00 |

9 1 2 3 1 2 1 5 2 1 3

**SCHEDULE B** **ITEMIZED DISBURSEMENTS**

Page 1 of 1 for LINE NUMBER 21B
(Use separate schedule(s) for each category of the Detailed Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (In Full)

NATIONAL REPUBLICAN CANDIDATES COMMITTEE

| Full Name, Mailing Address and ZIP Code | Purpose of Disbursement / Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
|---|---|---|---|
| A. Mark Winkler Management Co.<br>1900 N. Beauregard St.<br>Alexandria, VA 22311 | Rent | 12/01/80 | 275.00 |
| B. MediAmerica<br>1900 N. Beauregard St. #12<br>Alexandria, VA 22311 | Payment on Account<br>Acct. Pay. | 12/01/80 | 3500.00 |
| C. MediAmerica<br>1900 N. Beauregard St. #12<br>Alexandria, VA 22311 | Payment for Accounts Payable<br>Acct. Pay. | 12/01/80 | 1000.00 |
| D. MediAmerica<br>1900 N. Beauregard St. #12<br>Alexandria, VA 22311 | Reimbursement for Temporary Help Office Expenses | 12/01/80 | 1064.50 |
| E. C&P Telephone Co. of Virginia | Telephone | 12/29/80 | 83.09 |
| F. William P. Goldberg, Inc.<br>Washington, D.C. | Door Sign | 12/29/80 | 74.62 |
| G. | | | |
| H. | | | |
| I. | | | |

SUBTOTAL of Disbursements This Page (optional) .....

TOTAL This Period (last page this line number only) ..... 5997.21

**SCHEDULE D**
(Revised 3/80)

**DEBTS AND OBLIGATIONS**
**Excluding Loans**

Page 1 of 1 for LINE NUMBERS 1 10
(Use separate schedules for each numbered line)

| Name of Committee (in Full) NATIONAL REPUBLICAN CANDIDATES COMMITTEE | Outstanding Balance Beginning This Period | Amount Incurred This Period | Payment This Period | Outstanding Balance at Close of This Period |
|---|---|---|---|---|
| A. Full Name, Mailing Address and Zip Code of Debtor or Creditor<br>MediAmerica<br>1900 N. Beauregard St. #12<br>Alexandria, VA 22311 | 8,305.92 | -- | 3,500.00 | 4,805.92 |
| Nature of Debt (Purpose): Direct Mail, Postage List Rentals, Printing | | | | |
| B. Full Name, Mailing Address and Zip Code of Debtor or Creditor<br>MediAmerica<br>1900 N. Beauregard St. #12<br>Alexandria, VA 22311 | -- | 9,543.60 | -- | 9,543.60 |
| Nature of Debt (Purpose): Direct Mail, Postage Printing, List Rentals | | | | |
| C. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |
| D. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |
| E. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |
| F. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |
| 1) SUBTOTALS This Period This Page (optional) | | | | 9,543.60 |
| 2) TOTAL This Period (last page this line only) | | | | 14,349.52 |
| 3) TOTAL OUTSTANDING LOANS from Schedule C (last page only) | | | | |
| 4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only) | | | | 14,349.52 |

9120513327712

(6)

# 1980 REPUBLICAN SENATORIAL WINNERS

| | | | |
|---|---|---|---|
| AL | Jerry Denton<br>Denton for Senate<br>3443 Armour Dr.<br>Box 1980<br>Mobile, Alabama 36601<br>(rep. pick-up) | Admiral Denton<br>~~Roy Adams - Charge Counterpart~~<br>Could don't need him<br>~~DAVE KITCHEY~~ / MIKE ~~[illegible]~~ WERMUTH<br>EXECUTIVE ASSISTANT | (205)479-6562 |
| AK | Frank Murkowski<br>Murkowski for U. S. Senate<br>~~524 W. 6th Ave.~~<br>Anchorage, Alaska 99501<br>(rep. pick-up) | ~~BILL McCONKEY~~<br>437 E. ST Suite 80 | (907)276-3335 |
| AZ | Barry Goldwater<br>Goldwater for Senate Committee<br>Box 39515<br>Phoenix, Arizona 85069<br>(incumbent) | STEPHEN C. SHADEGG<br>STEPHEN SHADEGG ASS ATTY<br>377 N. 3rd AVE<br>PHOENIX AZ 85005 | (602)258-8169 |
| FL | Paula Hawkins<br>Paula Hawkins for Senate<br>Box 12637<br>Tallahassee, Florida 32308<br>(rep. pickup) | DON WEIDNER<br>TREASURER | (904)224-3207/5748 |
| GA | Mack Mattingly<br>Friends of Mack Mattingly<br>Box 1980<br>Atlanta, Ga. 30301<br>(rep. pick-up) | MARY EGBERT<br>CAMPAIGN MANAGER<br>~~[illegible]~~ | (404)231-5715 |
| ID | Steve Symms<br>Symms for Senate<br>Box 471<br>Boise, Idaho 83701<br>(rep. pick-up) | PHIL REBERGER<br>CAMPAIGN MANAGER | (208)344-1776 |
| IN | Dan Quayle<br>Quayle for Senate<br>Box 216<br>Indianapolis, Indiana 46206<br>(rep. pick-up) | MARK MILES<br>CAMPAIGN MANAGER<br>DAVID CULP & CO. | (317)636-8080 |
| IA | Charles Grassley<br>Grassley for Senate<br>Box 1000<br>Des Moines, Iowa 50306<br>(rep. pick-up) | TREAS - JOHN HENSS<br>CAMPAIGN MGR. JOHN MAXWELL | (515)243-1980 |
| KN | Robert Dole<br>Dole for Senate<br>1001 Kansas Ave.<br>Topeka, Kansas 66612<br>(incumbent) | CAM CARLY DUNN<br>TREAS - CHARLES CLINKENBEARD | (913)233-1203 |

no report 11/11/80

FEC EX 11

KN 5-24-82

Charles Mathias
Marylanders for Mathias
9300 Georgia Ave.
MD. Silver Springs, Maryland 20910
(301)588-9383
(Incumbent)

Paul Laxalt
Laxalt for Senate
Box 2207
NV. Carson City, Nevada 89701
(702)883-7711
(Incumbent)

JERRY DONDERO C MGR
OLLIE KINNEY TREAS

Warren Rudman
Warren Rudman for U. S. Senate
Box 2016
Concord, NH 03301
NH (603)225-5384
(rep. pick-up) Dear Senator-elect Rudman

MR. ALLAN WALKER C MGR Campaign Manager
Mr. William Phillips TREAS

Alfonse D'Amato
Friends of Al D'Amato
18 E. Sunrise Hwy., Suite 301
NY Freeport, N. Y. 11520
(212)582-1772 Dear Senator-elect D'Amato

MR. CARL OTTOSEN C. MGR
CARL Wyander TREAS

John East
John East for Senate Committee
Box 26493
NC Raleigh, N.C. 27611 Dear Senator-elect
(919)782-7331
(rep. pick-up)

Mark Andrews
Andrews for Senate Committee
Box 1773
ND Fargo, ND 58107
(701)232-8030

ED DOHERTY C MGR
Robert C. RUST TREAS

Don Nickles
Nickles for Senate
Box 1549
OK Ponca City, Oklahoma 74601
(405)762-1628

Robert Packwood
Reelect Bob Packwood Committee
Box 619
OR Portland, Oregon 97207
(503)249-0411
(incumbent)

Dear Senator

Arlen Specter
Specter for Senate
PA

Suite 1402
Western Savings Bank Building
Broad & Chestnut St.
Philadelphia, Pa. 19107

(215)546-9750

SD Jim Abdnor
Friends for Jim Abdnor
Box 5004
Sioux Falls, South Dakota 57117
(605)331-2000
(rep. pick-up)

Dear Congressman

UT Jake Garn
Jake Garn Campaign Committee
Box 11998
Salt Lake City, Utah 84147
(801)532-2080

Dear Senator

Michael Leavitt C. Mgr.
Darrel Newman Treas.

WI Robert Kasten
Kasten for U. S. Senate
8665 N. Port Washington Rd.
Milwaukee, Wisconsin 53217
(414)351-6615
(rep. pick-up)

Dennis Howell Mgr.
Dear Cong. Mike Grebe C. Dir

WA Slade Gorton
Gorton for Senate
500 Wall Street
Seattle, Washington 98121
(206)447-9720
(rep. pick-up)

Helen Rasmussen Mgr.
Carl Williams

Sen.-elect

Speaker-Elect Paula Hawkins

8304053

RECEIVED

82 FEB 4 P12:37

SEBAM & HERGE
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
SUITE 100
6300 GREENSBORO DRIVE
MCLEAN, VIRGINIA 22101
(703) 821-1000

GLENN J. SEBAM, JR.
J. CURTIS HERGE
ROBERT R. SPARKS, JR.
A. MARK CHRISTOPHER

JANIS A. CHERRY
KAREN LUSSEN BLAIR
JOHN ROBERT CLARK III
D. ERIC SIVERTSEN

SUITE 270
1100 PENNSYLVANIA AVENUE, N. W.
WASHINGTON, D. C. 20005
(202) 821-1000
TELEX 710-821-0300
CABLE SEBAMHERGE

January 29, 1982

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

Re: National Candidates Committee
FEC I.D. #: C00130682

Gentlemen:

Enclosed herewith is the Report of Receipts and Disbursements of National Candidates Committee, FEC Form 3X, covering the period July 1, 1981 through December 31, 1981.

Sincerely,

Donna O. Sisk

Donna O. Sisk
Legal Assistant

enclosure

82032230937

FEC Ex. 12
KH 5-24-82

# STATEMENT OF ORGANIZATION

(see reverse side for instructions)

RECEIVED

82 FEB 4 P2:07

1. (a) Name of Committee (in Full) ☐ Check if name or address is changed.
NATIONAL CANDIDATES COMMITTEE

2. Date
January 29, 1982

(b) Address (Number and Street)
1900 North Beauregard Street, Suite 12

3. FEC Identification Number
C00130682

(c) City, State and ZIP Code
Alexandria, Virginia 22311

4. Is this an amended Statement? ☒ YES ☐ NO

5. TYPE OF COMMITTEE (check one):

☐ (a) This committee is a principal campaign committee. (Complete the candidate information below.)

☐ (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

| Name of Candidate | Candidate Party Affiliation | Office Sought | State/District |
|---|---|---|---|
| | | | |

☐ (c) This committee supports/opposes only one candidate _____ (name of candidate) and is NOT an authorized committee.

☐ (d) This committee is a _____ (National, State or subordinate) committee of the _____ (Democratic, Republican, etc.) Party.

☐ (e) This committee is a separate segregated fund.

☐ (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

6.

| Name of Any Connected Organization or Affiliated Committee | Mailing Address and ZIP Code | Relationship |
|---|---|---|
| | | |

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

☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization ☐ Membership Organization ☐ Trade Association ☐ Cooperative

7. Custodian of Records: Identify by name, address (phone number – optional) and position, the person in possession of committee books and records.

| Full Name | Mailing Address and ZIP Code | Title or Position |
|---|---|---|
| | | |

8. Treasurer: List the name and address (phone number – optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

| Full Name | Mailing Address and ZIP Code | Title or Position |
|---|---|---|
| CHRISTINE GRIFFITH TRIBBLE | 6038 Richmond Highway Apartment 110, Alexandria, Virginia 22303 | Treasurer |

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

| Name of Bank, Depository, etc. | Mailing Address and ZIP Code |
|---|---|
| | |

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

CHRISTINE GRIFFITH TRIBBLE — Christine G. Tribble — 1/29/82

Type or Print Name of Treasurer — SIGNATURE OF TREASURER — Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.

For further information contact: Federal Election Commission, Toll Free 800-424-9530, Local 202-523-4068

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | | | | | | | |

FEC FORM 1 (3/80)

S30401530938

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82 FEB 4 P2:0

# REPORT OF RECEIPTS AND DISBURSEMENTS
## For a Political Committee Other Than an Authorized Committee

(Summary Page)

1. Name of Committee (in Full)

NATIONAL CANDIDATES COMMITTEE

Address (Number and Street)

1900 North Beauregard Street
Suite 12

City, State and ZIP Code

Alexandria, Virginia 22311

☐ Check if address is different than previously reported.

2. FEC Identification Number

C00130682

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate based)

(a)
- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☒ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Monthly Report for _____
- ☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
- ☐ Thirtieth day report following the General Election on _____ in the State of _____
- ☐ Termination Report

(b) Is this Report an Amendment? ☐ YES ☐ NO

| SUMMARY | Column A This Period | Column B Calendar Year-to-Date |
|---|---|---|
| 5. Covering Period 7/1/81 Through 12/31/81 | | |
| 6. (a) Cash on Hand January 1, 19 81 | | $ 5,907.79 |
| (b) Cash on Hand at Beginning of Reporting Period | $ 1,221.07 | |
| (c) Total Receipts (from Line 18) | $ 0 | $ 1,511.00 |
| (d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B) | $ 1,221.07 | $ 7,418.79 |
| 7. Total Disbursements (from Line 28) | $ 81.77 | $ 6,279.49 |
| 8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) | $ 1,139.30 | $ 1,139.30 |
| 9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D) | $ 0 | |
| 10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D) | $ 12,349.52 | |

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

CHRISTINE GRIFFITH TRIBBLE
Typed or Print Name of Treasurer

Christine G. Tribble
SIGNATURE OF TREASURER

January 29, 1982
Date

For further information, contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

FEC FORM 3X (3/80)

# DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3X)

Name of Committee (in Full)
NATIONAL CANDIDATES COMMITTEE

Report Covering the Period:
From: 7/1/81 To: 12/31/81

| | COLUMN A Total This Period | COLUMN B Calendar Year-to-Date |
|---|---|---|
| **I. RECEIPTS** | | |
| 11. CONTRIBUTIONS (other than loans) FROM: | | |
| (a) Individuals/Persons Other Than Political Committees | 0 | 1,511.00 |
| (Memo Entry Unitemized $ ) | 0 | 0 |
| (b) Political Party Committees | 0 | 0 |
| (c) Other Political Committees | 0 | 0 |
| (d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c) | 0 | 1,511.00 |
| 12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES | 0 | 0 |
| 13. ALL LOANS RECEIVED | 0 | 0 |
| 14. LOAN REPAYMENTS RECEIVED | 0 | 0 |
| 15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.) | 0 | 0 |
| 16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES | 0 | 0 |
| 17. OTHER RECEIPTS (Dividends, Interest, etc.) | 0 | 0 |
| 18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17) | 0 | 1,511.00 |
| **II. DISBURSEMENTS** | | |
| 19. OPERATING EXPENDITURES Unitemized $81.77 | 81.77 | 6,279.49 |
| 20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES | 0 | 0 |
| 21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES | 0 | 0 |
| 22. INDEPENDENT EXPENDITURES (Use Schedule E) | 0 | 0 |
| 23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F) | 0 | 0 |
| 24. LOAN REPAYMENTS MADE | 0 | 0 |
| 25. LOANS MADE | 0 | 0 |
| 26. REFUNDS OF CONTRIBUTIONS TO: | | |
| (a) Individuals/Persons Other Than Political Committees | 0 | 0 |
| (b) Political Party Committees | 0 | 0 |
| (c) Other Political Committees | 0 | 0 |
| (d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c) | 0 | 0 |
| 27. OTHER DISBURSEMENTS | 0 | 0 |
| 28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27) | 81.77 | 6,279.49 |
| **III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES** | | |
| 29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d | 0 | 1,511.00 |
| 30. TOTAL CONTRIBUTION REFUNDS from Line 26d | 0 | 0 |
| 31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29) | 0 | 1,511.00 |
| 32. TOTAL OPERATING EXPENDITURES from Line 19 | 81.77 | 6,279.49 |
| 33. OFFSETS TO OPERATING EXPENDITURES from Line 15 | 0 | 0 |
| 34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32) | 81.77 | 6,279.49 |

SCHEDULE D
(Revised 3/80)

# DEBTS AND OBLIGATIONS
## Excluding Loans

Page 1 of 1 for
LINE NUMBER 17
(Use separate schedule for each numbered line)

| Name of Committee (in Full) NATIONAL CANDIDATES COMMITTEE | Outstanding Balance Beginning This Period | Amount Incurred This Period | Payment This Period | Outstanding Balance at Close of This Period |
|---|---|---|---|---|
| A. Full Name, Mailing Address and Zip Code of Debtor or Creditor<br>MediAmerica<br>1900 North Beauregard Street<br>Suite 12<br>Alexandria, Virginia 22311 | 12,349.52 | 0 | 0 | 12,349.52 |
| Nature of Debt (Purpose): Solicitation costs, Production and mailing services | | | | |
| B. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |
| C. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |
| D. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |
| E. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |
| F. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |
| 1) SUBTOTALS This Period This Page (optional) | | | | |
| 2) TOTAL This Period (last page this line only) | | | | 12,349.52 |
| 3) TOTAL OUTSTANDING LOANS from Schedule C (last page only) | | | | |
| 4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only) | | | | |

8 3 0 4 0 4 0 5 3 3 7
8 1 0 3 2 1 3 0 9 4 2

Gcc# 7914

# Milton Reporting, Inc.


R.E. Milton
President
F.R. Joyce
V.P. & General Mgr.
Y. Deutschman
Treasurer

*General Stenotype Reporting*
Suite 301
1601 Connecticut Ave., N.W.
Washington, D.C. 20009

Phone:
202-833-3598
202-833-3599

Notary Public
D.C., Va., Md.



82 JUN 8 P3:59


June 7, 1982

D. Richard Geske
MediAmerica
Mark Center Office Plaza 5
1900 N. Beauregard Street
Suite 12
Alexandria, Va. 22311

Re: National Republican Candidates' Committee.

Dear Mr. Geske:

On behalf of counsel who took your deposition on May 24, 1982, you are hereby notified that the transcript of your deposition is now ready and available at the above address for reading and signing as requested by you.

Kindly let the undersigned know when you will be in.

If it is not convenient for you to come to our offices, we would suggest you read counsel's carbon copy, prepare an errata sheet, sign the errata sheet before a notary public, return it to our office and we will attach it to the court copy of the transcript and proceed to file it with the court.

If by July 7, 1982, we have not received any request for extension of time or otherwise heard from you, it will be assumed that reading and signing are no longer desired, and the deposition will be filed.

Very sincerely yours,

MILTON REPORTING, INC.

Karen Hunnicutt
Reporter/Notary

cc:
file

Jonathan Levin, Esq.
Robert R. Sparks, Jr., Esq.


8304053536

202715

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Doc# 8450
82 SEP 13

**Milton Reporting, Inc.**

*General Stenotype Reporting*

Suite 301
1601 Connecticut Ave., N.W.
Washington, D.C. 20009

R.E. Milton
President
F.R. Joyce
V.P. & General Mgr.

Phone:
202-833-3598
202-833-3599

Notary Public
D.C.-Va.-Md.

September 8, 1982

Jonathan Levin, Esq.
Federal Election Commission
1325 K Street, N.W.-7th Floor
Washington, D.C.

2 SEP 13 P1:57

Re: National Republican Candidates' Committee, et al.
Deposition of D. Richard Geske - MUR 1363
May 4, 1982

Dear Mr. Levin:

Enclosed herewith in the original copy of the deposition of Mr. D. Richard Geske in the above captioned case. This original copy is forwarded for your files, as Mr. Geske has not shown up for reading and signing as to date.

Sincerely,

Fred R. Joyce,
General Mgr.

cc:
file
Robert R. Sparks, Jr., ESq.

8 3 0 4 0 4 3 5 3 5 5

Doc# 7423


**SEDAM & HERGE**
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
SUITE 1100
8300 GREENSBORO DRIVE
McLEAN, VIRGINIA 22102

(703) 821-1000

GLENN J. SEDAM, JR.
J. CURTIS HERGE
ROBERT R. SPARKS, JR.
A. MARK CHRISTOPHER

JANIS A. CHERRY
KAREN LUSSEN BLAIR
JOHN ROBERT CLARK III
B. ERIC SIVERTSEN

SUITE 270
1700 PENNSYLVANIA AVENUE, N. W.
WASHINGTON, D. C. 20006
(703) 821-1000

TELEX: 710-831-0896

CABLE: SEDANHERGE


March 25, 1982


82 MAR 26 A11:32


Kenneth A. Gross, Esq.
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Attention: Stephen Mims, Esq.

Re: MUR 1363

Dear Mr. Gross:

On February 22, 1982, the Federal Election Commission issued a subpoena to D. Richard Geske, requiring him to provide certain documents in connection with the above-captioned matter. By letter dated March 23, 1982, you confirmed that the due date for compliance with the subpoena had been extended to March 26, 1982. In that connection, there are enclosed copies of documents requested by the referenced subpoena, together with a description of those documents, in paragraphs numbered to correspond to the numbered paragraphs of the subpeona.

1. The Articles of Incorporation of MediAmerica, Inc.

2. The By-Laws of MediAmerica, Inc.

3. There exist no By-Laws, charter or other governing document, of National Candidates Committee (formerly known as National Republican Candidates' Committee and hereinafter referred to as "NCC"). It had been the intention to incorporate NCC under the Virginia Nonstock Corporation Act. Discussions to that effect had been had with counsel prior to the time the subject complaint was filed. Incorporation was postponed until this matter is resolved.


0 5 0 4 0 1 3 5 5 5 0

4(a) and 4(b). Attached are invoices numbered 758 and 000010 from MediAmerica, Inc. to NCC for services, supplies and postage for direct-mail solicitation letters mailed on or about October 25, October 26 and December 5, 1980. Also included are MediAmerica, Inc. invoices numbered 772 and 776, representing charges for materials and services, equipment, office furnishings and personnel expenses supplied by MediAmerica, Inc. to NCC. Invoices 772 and 776 reflect charges for the time expended by employees of MediAmerica, Inc. for NCC. Those time charges were calculated by Mrs. King, the bookkeeper of MediAmerica, Inc. No agreement exists between MediAmerica, Inc. and NCC which establish the basis for extending credit, the terms of the extension of credit or payment schedules. This is consistent with the standard practice of MediAmerica, Inc. in its dealings with other clients, as shown below.

4(c). Attached are invoices of MediAmerica, Inc. to various of its clients in 1980, including political committees, for services, supplies and postage for direct-mail solicitation letters and other services.

MediAmerica, Inc. rendered its services on the basis of verbal agreements, thus no written agreements exist between MediAmerica, Inc. and these various clients. As in the case of NCC, MediAmerica, Inc. frequently advanced postage and other expenses on behalf of its clients and, when appropriate, rendered charges for time expended by employees of MediAmerica, Inc. on behalf of its clients. It will also be noted that the terms of credit vary. In some cases, the invoices provide that they are due and payable upon receipt, while others provide for carrying charges. The majority of invoices have no terms. As recorded on the invoices, some are paid promptly, some in installments and some after the passage of several months.

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The basis for extending credit and the terms of the extension of credit between MediAmerica, Inc. and NCC were clearly similar to the basis and terms extended by MediAmerica, Inc. to its other clients. (NOTE: THE MATERIAL SUPPLIED HEREIN IS PROPRIETARY INFORMATION OF MEDIAMERICA, INC. AND SHOULD NOT BE MADE PART OF THE PUBLIC RECORD.)

4(d). Materials which relate to the establishment of NCC and its organizational structure consist of materials submitted and explained by counsel by letters dated February 25, 1981 and July 30, 1981. Attached is a copy of notes taken at a meeting between Mr. Geske and Mr. Romanin on August 18, 1980. At that meeting, discussions were had about an initial budget, individuals who might be solicited to provide funds for the first mailing and about the acquisition of an initial mailing list. Messrs. Romanin and Geske were responsible for all decisions concerning NCC. (The current members of the Board of Directors of MediAmerica, Inc. and its officers are: D. Richard Geske, President; G.Weber, Vice President; D. Seese, Secretary and Treasurer; and, Rhonda K. Stahlman.)

5. Attached are copies of letters and checks, described therein, from NCC to the following Senators and Congressman:

(a) Senator D'Amato
(b) Senator Hawkins
(c) Senator Mattingly
(d) Senator Symms
(e) Senator Grassley
(f) Rep. LeBoutillier
(g) Rep. Molinari
(h) Rep. McCollum
(i) Rep. Hunter
(j) Rep. Carman

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6. Attached are the following:

(a) List of telephone calls (3 pages) to individuals associated with the campaigns of successful condidates for election to the Senate.

(b) Memorandum of telephone conversation of December 18, 1980 to Mary Beth Blumberg of the staff of Senator-elect Hawkins.

(c) Copies of NCC checks numbered 101-104 and 116 payable to MediAmerica, Inc. for invoices or other obligations as indicated thereon.

(d) Letter to NCC by Senator Symms, dated March 30, 1981.

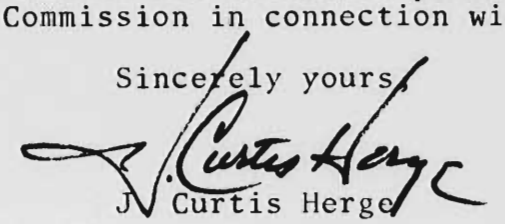
(e) Copies of direct-mail solicitations for contributions made by NCC.

(f) Copies of correspondence between the United States Postal Service and MediAmerica, Inc. relative to the use of the word "urgentgram" on the solicitations produced for NCC. (An issue which has been resolved.) Copies of the material submitted in response to the subpeona in that matter are not included because they duplicate the material herein produced.

(g) Copies of correspondence relative to the complaint by the Republican National Committee, National Republican Congressional Committee and National Republican Senatorial Committee to the use of the word "Republican" in the original name of NCC. (An issue which has been resolved.)

Not included with this response are communications to and from counsel on this matter and documents previously submitted to the Federal Election Commission in connection with this matter.

Sincerely yours,



J. Curtis Herge

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# ARTICLES OF INCORPORATION
# OF
# MEDIAMERICA, INC.

In compliance with the requirements of Chapter 1 of Title 13.1 of the Code of Virginia, the undersigned hereby acts to form a stock corporation and to that end sets forth the following:

## ARTICLE I

The name of the corporation is: MEDIAMERICA, INC., hereinafter referred to as the "Corporation."

## ARTICLE II

The purpose or purposes for which the Corporation is organized and shall be operated is to conduct the business of bringing to the attention of the public through the press, magazines, pamphlets and other means the characteristics, ability and other qualities tending to establish in the minds of the public the character and ability of its subscribers; to design, write, prepare, place, publish and display, in any manner, advertisements and publicity devices and innovations of all kinds for itself and others; to print, publish and distribute writings of every kind and description; to arrange for the placing of advertisements; to do a general advertising, media and publicity business in all its branches; and, to engage in any other lawful act or activity for which a corporation organized under the laws of Virginia is permitted.

## ARTICLE III

The aggregate number of shares which the Corporation shall have authority to issue shall be TEN THOUSAND (10,000)

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shares with a par value of Ten Cents ($.10) per share. All shares shall be common shares with full voting and preemptive rights.

ARTICLE IV

The post-office address of the initial registered office of the Corporation is 7600 Old Springhouse Road, McLean, Virginia 22101, which is located in Fairfax County, Virginia. The name of its registered agent is J. CURTIS HERGE, who is a resident of Virginia and who is a member of the Virginia State Bar and whose business office is the same as the registered office of the Corporation.

ARTICLE V

The number of Directors constituting the initial Board of Directors is three (3) and the name and addresses of the persons who are to serve as the initial Directors are:

Thomas M. Davis, III
6318 Nicholson Street
Falls Church, Virginia 22044

Michael D. Hughes
6115 Roxbury Avenue
Springfield, Virginia 22152

J. Curtis Herge
1102 Waynewood Boulevard
Alexandria, Virginia 22308

I, the undersigned, J. CURTIS HERGE, being the Incorporator herein named, for the purpose of forming a corporation pursuant to the Virginia Stock Corporation Act of

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the Commonwealth of Virginia, do make this certificate, hereby declaring and certifying that this is my act and deed and the facts herein stated are true and, accordingly, have set my hand this 17th day of April, 1978.

W. Curtis Herge

W. CURTIS HERGE
Incorporator

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# BY-LAWS

# OF

# MEDIAMERICA, INC.

## ARTICLE I

## Offices

Section 1. Principal Office. The principal office of the corporation shall be located in the Commonwealth of Virginia, United States of America. The corporation shall have and continuously maintain in the Commonwealth of Virginia a registered office, and a registered agent whose business office is identical with such registered office. The address of the principal or the registered office may be changed from time to time by the Board of Directors.

Section 2. Other Offices. The corporation may also have an office or offices at such other place or places within or without the Commonwealth of Virginia as the Board of Directors may, from time to time, designate as the business of the corporation may require.

## ARTICLE II

## Stockholders

Section 1. Annual Meeting. The Annual Meeting of the Stockholders shall be held each year, at a time and place set by the Board of Directors, for the purpose of electing Directors and for the transaction of such other business as may come before the meeting.



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Section 2. Special Meetings. Special Meetings of the Stockholders, for any purpose or purposes, unless otherwise prescribed by statute, may be called by the Board of Directors and shall be called by any of the officers at the request of the holders of not less than fifty-one percent of all issued shares of the Corporation entitled to vote at the meeting.

Section 3. Place of Meeting. The Board of Directors or the President of the Corporation may designate any place, either within or without the Commonwealth of Virginia, and/or within or without the United States of America, unless otherwise prescribed by statute, as the place of meeting for any Annual Meeting or for any Special Meeting of the Stockholders. A waiver of notice signed by all Stockholders entitled to vote at a meeting may designate any place, either within or without the Commonwealth of Virginia, unless otherwise prescribed by statute, as the place for holding such meeting. If no designation is made, or if a Special Meeting be otherwise called, the place of meeting shall be the principal office of the Corporation.

Section 4. Notice of Meeting. Written or printed notice stating the place, day and hour of the meeting and, in case of a Special Meeting, the purpose or purposes for which the meeting is called, shall be delivered not less than 5 nor more than 30 days before the date of the meeting, either personally or by mail, by or at the direction of the Board of Directors, President or Secretary of the Corporation, to each Stockholder of record entitled to vote at such meeting.



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If mailed, such notice shall be deemed to be delivered when deposited in the United States mail, addressed to the Stockholder at his address as it appears on the stock transfer books of the Corporation, with postage thereon prepaid.

Section 5. Closing of Transfer Books or Fixing of Record Date. For the purpose of determining Stockholders entitled to notice of or to vote at any meeting of Stockholders, or Stockholders entitled to receive payment of any dividend, or in order to make a determination of Stockholders for any other proper purpose, the Board of Directors of the Corporation may provide that the stock transfer books shall be closed for a stated period but not to exceed, in any case, 50 days. If the stock transfer books shall be closed for the purpose of determining Stockholders entitled to notice of or to vote at a meeting of Stockholders, such books shall be closed for at least 30 days immediately preceding such meeting. In lieu of closing the stock transfer books, the Board of Directors may fix in advance a date as the record date for any such determination of Stockholders, such date in any case not to be more than 30 days, and in the case of a meeting of Stockholders not less than 10 days, prior to the date on which the particular action requiring such determination of Stockholders is to be taken. If the stock transfer books are not closed and no record date is fixed for the determination of Stockholders entitled to notice of or to vote at a meeting of Stockholders, or Stockholders entitled to receive payment of a dividend, the date on which notice of the meeting is mailed or the date on which the resolution of the Board of



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Directors declaring such dividend is adopted, as the case may be, shall be the record date for such determination of Stockholders. When a determination of Stockholders has been made as provided in this section, such determination shall apply to any adjournment thereof.

Section 6. Voting Lists. The Treasurer, having charge of the stock transfer books for shares of the Corporation, shall make, at least 10 days before each meeting of Stockholders, a complete list of the Stockholders entitled to vote at such meeting, or any adjournment thereof, arranged in alphabetical order, with the address of and the number of shares held by each, which list, for a period of 10 days prior to such meeting, shall be kept on file at the principal office of the Corporation and shall be subject to inspection by any Stockholder at any time during usual business hours. Such list shall also be produced and kept open at the time and place of the meeting and shall be subject to the inspection of any Stockholder during the whole time of the meeting. The original stock transfer book shall be prima facie evidence as to who are the Stockholders entitled to examine such list or transfer books or to vote at the meeting of Stockholders.

Section 7. Quorum. At any meeting of Stockholders fifty-one percent of the outstanding shares of the Corporation entitled to vote, represented in person or by proxy, shall constitute a quorum at a meeting of Stockholders. If less than said number of the outstanding shares are represented at a meeting, a majority of the shares so represented must adjourn the meeting without further notice. At a meeting



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at which a quorum shall be present or represented, any business may be transacted which might be transacted at the meeting as originally notified. The Stockholders present at a duly organized meeting may continue to transact business until adjournment, notwithstanding the withdrawal of enough Stockholders to leave less than a quorum.

Section 8. Proxies. At all meetings of Stockholders, a Stockholder may vote by proxy executed in writing by the Stockholder or by his duly authorized attorney-in-fact. Such proxy shall be filed with the Secretary of the Corporation before or at the time of the meeting.

Section 9. Voting. Each Stockholder entitled to vote in accordance with the terms and provisions of the Articles of Incorporation and these By-laws shall be entitled to one vote, in person or by proxy, for each share of stock entitled to vote held by such Stockholder. Upon the demand of any Stockholder, the vote for Directors and upon any question before the meeting shall be by ballot. All elections and all other questions shall be decided by majority vote of the shares of the Corporation represented at a meeting at which a quorum is present and which are entitled to vote except as otherwise provided by the Articles of Incorporation or the laws of the Commonwealth of Virginia.

Section 10. Order of Business. The order of business at all meetings of the Stockholders, shall be as follows:

1. Roll Call.
2. Proof of notice of meeting or waiver of notice.



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3. Reading of minutes of preceding meeting.

4. Reports of Officers.

5. Reports of Committees.

6. Election of Directors (only at Annual Meeting).

7. Unfinished Business.

8. New Business.

Section 11. Informal Action By Stockholder. Unless otherwise provided by law, any action required to be taken at a meeting of the Stockholders, may be taken without a meeting if a consent in writing, setting forth the action so taken, shall be signed by all of the stockholders entitled to vote with respect to the subject matter thereof.

Section 12. Stockholder Insurance. The Stockholders may, from time to time, enter into agreements between and among themselves which provide for the purchase of the shares of stock of a Stockholder who has deceased or who is no longer associated with the Corporation by the remaining Stockholder or Stockholders or by the Corporation. Such agreements may be funded by an insurance policy or policies.

## ARTICLE III

## Board of Directors

Section 1. General Powers. The business and affairs of the Corporation shall be managed by its Board of Directors. The Directors shall in all cases act as a Board, and they may adopt such rules and regulations for the conduct of their meetings and the management of the Corporation, as

they may deem proper, not inconsistent with these By-laws and the laws of the Commonwealth of Virginia.

Section 2. Number, Tenure and Qualifications. The number of Directors constituting the Board of Directors of the Corporation shall be five. Each Director shall hold office until the next Annual Meeting of Stockholders and until his successor shall have been elected and qualified.

Section 3. Regular Meetings. A Regular Meeting of the Board of Directors shall be held without other notice than this By-law immediately after, and at the same place as, the Annual Meeting of Stockholders. The Board of Directors may provide, by resolution, the time and place for the holding of additional Regular Meetings without other notice than such resolution.

Section 4. Special Meetings. Special Meetings of the Board of Directors may be called by or at the request of any three Directors. The person or persons authorized to call Special Meetings of the Board of Directors may fix the place for holding any Special Meeting of the Board of Directors called by them.

Section 5. Notice. Notice of any Special Meeting shall be given at least three days previously thereto by written notice delivered personally, or by telegram or mailed to each Director at his business address. If mailed, such notice shall be deemed to be delivered when deposited in the United States mail so addressed, with postage thereon prepaid. If notice be given by telegram, such notice shall be deemed to be delivered when the telegram is delivered to the telegraph company. The attendance of a Director at a



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meeting shall constitute a waiver of notice of such meeting, except where a Director attends a meeting for the express purpose of objecting to the transaction of any business because the meeting is not lawfully called or convened.

Section 6. Quorum. At any meeting of the Directors a majority shall constitute a quorum for the transaction of business, but if less than said number is present at a meeting, a majority of the Directors present may adjourn the meeting from time to time without further notice.

Section 7. Manner of Acting. The act of the majority of the Directors present shall be the act of the Board of Directors.

Section 8. Newly Created Directorships and Vacancies. Newly created directorships resulting from an increase in the number of Directors, and vacancies occuring in the Board of Directors for any reason except the removal of Directors without cause, may be filled by a vote of a majority of the Directors then in office, although less than a quorum exists. Vacancies occurring by reason of the removal of Directors without cause shall be filled by vote of the Stockholders. A Director elected to fill a vacancy caused by resignation, death or removal shall be elected to hold office for the unexpired term of his predecessor.

Section 9. Removal of Directors. Any or all of the Directors may be removed for cause by vote of the Stockholders or by action of the Board. Directors may be removed without cause only by vote of the Stockholders.

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Section 10. Resignation. A Director may resign at any time by giving written notice to the Board, the President or the Secretary of the Corporation unless otherwise specified in the notice, the resignation shall take effect upon receipt thereof by the Board or such officer, and the acceptance of the resignation shall not be necessary to make it effective.

Section 11. Compensation. No compensation shall be paid to Directors, as such, for their services, but by resolution of the Board of Directors a fixed sum and expenses for actual attendance at each Regular or Special Meeting of the Board of Directors may be authorized. Nothing herein contained shall be construed to preclude any Director from serving the Corporation in any other capacity and receiving compensation therefor.

Section 12. Presumption of Assent. A Director of the Corporation who is present at a meeting of the Board of Directors at which action on any corporate matter is taken shall be presumed to have assented to the action taken unless his dissent shall be entered in the minutes of the meeting or unless he shall file his written dissent to such action with the person acting as the Secretary of the meeting before the adjournment thereof or shall forward such dissent by registered mail to the Secretary of the Corporation immediately after the adjournment of the meeting. Such right to dissent shall not apply to a Director who voted in favor of such action.

Section 13. Executive and Other Committees. The Board, by resolution, may designate from among its members



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an Executive Committee and other committees, each consisting of two or more directors. Each such committee shall serve at the pleasure of the Board.

Section 14. Action by Directors Without a Meeting. Any action required to be taken at a meeting of the Board of Directors, or any action which may be taken at a meeting of the Board of Directors or of a committee of the Board of Directors, may be taken without a meeting if a consent in writing, setting forth the action, shall be signed either before or after such action by all the Directors, or all the members of the committee, as the case may be.

## ARTICLE IV

## Officers

Section 1. Number. The officers of the Corporation shall be a President, a Vice-President, a Secretary and a Treasurer, each of whom shall be elected by the Board of Directors. The President shall be a Director. Any two or more offices may be held by the same person, except the offices of President and Secretary. Such other officers and assistant officers as may be deemed necessary may be elected or appointed by the Board of Directors.

Section 2. Election and Term of Office. The officers of the Corporation to be elected by the Board of Directors shall be elected annually at the first meeting of the Board of Directors held after each annual meeting of the stockholders. Each officer shall hold office for the ensuing



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corporate year and until his successor shall have been duly elected and shall have qualified, or until his death or until he shall resign or shall have been removed in the manner hereinafter provided.

Section 3. Removal. Any officer or agent elected or appointed by the Board of Directors may be removed by the Board of Directors whenever, in its judgment, the best interests of the Corporation would be served thereby, but such removal shall be without prejudice to the contract rights, if any, of the person so removed.

Section 4. Vacancies. A vacancy in any office because of death, resignation, removal, disqualification or otherwise, may be filled by the Board of Directors for the unexpired portion of the term.

Section 5. President. The President shall be the principal executive officer of the Corporation and, subject to the control of the Board of Directors, shall, in general, supervise and control all of the business and affairs of the Corporation. He shall, when present, preside at all meetings of the Stockholders and of the Board of Directors. He may sign, with the Secretary or any other proper officer of the Corporation thereunto authorized by the Board of Directors, certificates for shares of the Corporation, any deeds, mortgages, bonds, contracts, or other instruments which the Board of Directors has authorized to be executed, except in cases where the signing and execution thereof shall be expressly delegated by the Board of Directors or by these



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By-laws to some other officer or agent of the Corporation, or shall be required by law to be otherwise signed or executed; and, in general, shall perform all duties incident to the office of President and such other duties as may be prescribed by the Board of Directors from time to time.

Section 6. Vice-President. In the absence of the President or in event of his death, inability or refusal to act, the Vice-President shall perform the duties of the President and, when so acting, shall have all the powers of and be subject to all the restrictions upon the President. The Vice-President shall perform such other duties as from time to time may be assigned to him by the President or by the Board of Directors. In the event the office of Vice-President shall be vacant, the Secretary shall discharge the foregoing described duties of the Vice-President.

Section 7. Secretary. The Secretary shall keep the minutes of the Stockholders' and of the Board of Directors' meetings in one or more books provided for that purpose, see that all notices are duly given in accordance with the Provisions of these By-laws or as required, be custodian of the corporate records and of the seal of the Corporation and keep a register of the post-office address of each Stockholder which shall be furnished to the Secretary by such Stockholder, have general charge of the stock transfer books of the Corporation and, in general, perform all duties incident to the office of Secretary and such other duties as from time to time may be assigned to him by the President or by the Board of Directors.



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Section 8. Treasurer. If required by the Board of Directors, the Treasurer shall give a bond for the faithful discharge of his duties in such sum and with such surety or sureties as the Board of Directors shall determine. The Treasurer shall have charge and custody of and be responsible for all funds and securities of the Corporation; receive and give receipts for monies due and payable to the Corporation from any source whatsoever, and deposit all such monies in the name of the Corporation in such banks, trust companies or other depositories as shall be selected in accordance with these By-laws and, in general, perform all of the duties incident to the office of Treasurer and such other duties as from time to time may be assigned to him by the President or by the Board of Directors.

Section 9. Salaries. The salaries of the officers shall be fixed from time to time by the Board of Directors and no officer shall be prevented from receiving such salary by reason of the fact that he is also a Director of the Corporation.

## ARTICLE V

## Contracts, Loans, Checks and Deposits

Section 1. Contracts. The President is authorized to enter into any contract or execute and deliver any instrument in the name of and on behalf of the Corporation, and such authority may be general or confined to specific instances.

Section 2. Loans. No loans shall be contracted on behalf of the Corporation and no evidences of indebtedness

shall be issued in its name unless authorized by a resolution of the Board of Directors. Such authority may be general or confined to specific instances.

Section 3. Checks, Drafts, Etc. All checks, drafts or other orders for the payment of money, notes or other evidences of indebtedness issued in the name of the Corporation, shall be signed by such officer or officers, agent or agents of the Corporation and in such manner as shall from time to time be determined by resolution of the Board of Directors.

Section 4. Deposits. All funds of the Corporation not otherwise employed shall be deposited from time to time to the credit of the Corporation in such banks, trust companies or other depositories as the Board of Directors may select.

## ARTICLE VI

## Certificate for Shares and Their Transfer

Section 1. Certificates For Shares. Certificates representing shares of the Corporation shall be in such form as shall be determined by the Board of Directors. Such certificates shall be signed by the President and by the Secretary or by such other officers authorized by law, and sealed with the seal of the Corporation. All certificates for shares shall be consecutively numbered or otherwise identified. The name and address of the Stockholders, the number of shares and date of issue, shall be entered on the



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stock transfer books of the Corporation. All certificates surrendered to the Corporation for transfer shall be cancelled and no new certificate shall be issued until the former certificate for a like number of shares shall have been surrendered and cancelled, except that in case of a lost, destroyed or mutilated certificate a new one may be issued therefor upon such terms and indemnity to the Corporation as the Board of Directors may prescribe.

Section 2. Transfers of Shares.

(a) Upon surrender to the Corporation, or to the transfer agent of the Corporation, of a certificate for shares duly endorsed or accompanied by proper evidence of succession, assignment or authority to transfer, it shall be the duty of the Corporation to issue a new certificate to the person entitled thereto, and cancel the old certificate; every such transfer shall be entered on the transfer book of the Corporation which shall be kept at its principal office.

(b) The Corporation shall be entitled to treat the holder of record of any share as the holder in fact thereof, and, accordingly, shall not be bound to recognize any equitable or other claim to or interest in such share on the part of any other person whether or not it shall have express or other notice thereof, except as expressly provided by the laws of the Commonwealth of Virginia.

## ARTICLE VII

## Fiscal Year

The fiscal year of the corporation shall be established by the Board of Directors.



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## ARTICLE VIII

### Dividends

The Board of Directors may from time to time declare, and the Corporation may pay, dividends on its outstanding shares in the manner and upon the terms and conditions provided by law.

## ARTICLE IX

### Seal

The Board of Directors shall provide a corporate seal which shall be circular in form and shall have inscribed thereon the words, "MEDIAMERICA, INC., Virginia, 1978", and the words, "Corporate Seal".

## ARTICLE X

### Waiver of Notice

Unless otherwise provided by law, whenever any notice is required to be given to any Stockholder or Director of the Corporation under the provisions of these By-laws or under the provisions of the Articles of Incorporation, a waiver thereof in writing, signed by the person or persons entitled to such notice, whether before or after the time stated therein, shall be deemed equivalent to the giving of such notice.

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## ARTICLE XI

### Amendments

These By-laws may be altered, amended or repealed, and new By-laws may be adopted, by a majority vote of the Board of Directors or Stock at any Annual Meeting or at any Special Meeting when the proposed amendment has been set out in the notice of such meeting.

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4(a) and 4(b)

AMERICA

Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 998-0334

National Republicans Candidates
Committee
1900 N. Beauregard St., Ste. 12
Alexandria, VA. 22311

October 27, 1980

Job #0037 Invoice #758

Production and mailing services. Total count 8778 Urgent Grams. Drop date 10/25 & 10/26/80.

| | |
|---|---|
| Production: | |
| 8778 @ .50/each | $ 4,389.00 |
| Set-up | 10.00 |
| Printing: | |
| BRE #9 Blue (15K) | 569.82 |
| Carrier Window (15K) | 636.00 |
| Live stamp application | 50.00 |
| Stamp Spoilage | 17.00 |
| Postage for 8778 | 2,633.40 |
| Total Due | $8,305.92 |

All invoices are due and payable upon receipt. All charges are payable 20 days from date of invoice. A service charge of 1.5% per month (equivalent to 18% per year) will be added to past due items.

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# MEDIAMERICA

Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

**INVOICE**
**000010**

All charges are payable 30 days from date of invoice. A **SERVICE CHARGE** of 1.5% per month (equivalent to 18% per year) will be added to past due items.

**National Republican Candidates Committee**
**1900 North Beauregard Street, #12**
**Alexandria, Virginia 22311**

| Account Number |
|---|
| |

**Job #0090**

PURCHASE ORDER NO.

Please Send One Copy With Remittance

| DATE | INVOICE NUMBER | DESCRIPTION | AMOUNT |
|---|---|---|---|
| 12/12/80 | | Composition/Production of 12,245 UrgentGrams. Drop date - December 5, 1980. | |
| | | -Copy Creative Fee | $ 1,000.00 |
| | | -UrgentGram @ .50/unit | 6,122.50 |
| | | -Printing - Envelopes 20K Blue Wove Black Ink | 584.35 |
| | | -Postage (.15 each) | 1,836.75 |
| | | TOTAL DUE | $ 9,543.60 |
| | | Paid on Account 1/10/81 - Ck. #116 | 2,000.00 |
| | | BALANCE DUE | $ 7,543.60 |

Claims for defects, damages or shortages must be made in writing within a period of ten (10) days after delivery.

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

November 18, 1980

National Republican
Candidates' Committee
1900 N. Beauregard St.
Alexandria, VA 22311

Invoice # 772

Reimbursement for services rendered by MediaAmerica for November, 1980.

| | |
|---|---|
| Secretarial Receptionist, General Office: | |
| J. Kanak (Caging/Batching/Zeroxing) work-up for stationery 17 hr at 5.49/hr. | $ 92.00 |
| B. Wheeler (Caging/Batching,verification 35 hr at 4.00/hr. | 140.00 |
| A. Gosain/Filing/general office 7 hr at 4.00/hr. | 28.00 |
| Keypunch & Verify Contributors List | 100.00 |
| Accounting: | |
| S. King (28 hrs at 8.24/hr.) Caging, Batching, Bank Deposits FEC report, Organizing Files. | 198.00 |
| Xerox Machine: Copies,Supplies. | 70.00 |
| IBM Typewriter, File Cabinet, Desk, Desk Chair. | 150.00 |
| Answering Telephone ($40/wk: 11-4-80/11-30-80) | 140.00 |
| Administrative (S. King 10 hrs at 8.24) Chart of Accounts/Opening Bank Accounts | 82.00 |
| TOTAL | $1,000.00 |

Paid

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MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

November 26, 1980

National Republican
Candidates' Committee
1900 N. Beauregard St.
Alexandria, VA 22311

Invoice # 776

Reimbursement of services rendered by MediaAmerica for December, 1980.

| | |
|---|---|
| **Secretarial Receptionist:** | |
| Answering telephone(40/week:12/1-12/31) | $ 160.00 |
| Anita Gosain-general office-set-up files (37.5 hr x 4) | 150.00 |
| Filing at 4hr x 4.00 | 16.00 |
| **Supplies:** | |
| 5 Boxes file folders at($15/each) | 75.00 |
| 2 Boxes letter size folders($12/each) | 24.00 |
| 3 Packages of red tabs($3/each) | 9.00 |
| 1 Package of white tabs | 1.50 |
| 1 Accounting check holder | 18.00 |
| **Keypunch**: Contributors and verify | 120.00 |
| **Xerox Machine**: Copies and supplies | 70.00 |
| **IBM Typewriter,** File Cabinet, Desk & Desk Chair | 150.00 |
| **Accounting & General Office:** | |
| S. King (8.24 x 33 hours) | |
| FEC Report | |
| Caging and batching | |
| Bank deposits | 271.00 |
| TOTAL | $ 1,064.50 |

Paid —

8304043537

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

4(c)

October 6, 1980

NCPAC
1500 Wilson Blvd.
Arlington, Va. 22209

Invoice #701

POSTAGE ADVANCE FOR AMERICAN PUBLIC ISSUES LIST
TO DROP 10/1/80 ---for 225M
(J7P38 AMERICAN PUBLIC ISSUES LIST) $33,750.00

83040435335

paid
10/6/80
ck# 26 87
$33,750.00

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

Gun Owners of America/
California
455 Capital Mall, Suite 315
Sacramento, CA 95814

October 2, 1980

Job #0044 Invoice #687

Calling 1,000 Gun Owners of America, and 1,000 Gun Owners of California.

| | | |
|---|---|---|
| @ $2.50 per name | | $ 5,000.00 |
| Paid on Account Ck. #1731 9/26/80 | | -2,500.00 |
| | Total Due | $ 2,500.00 |

All invoices are due and payable upon receipt.
All charges are payable 20 days from date of invoice. A service charge of 1.5% per month (equivalent to 18% per year) will be added to past due items.

paid 10/4/80
ck # 1731
$ 2500.00

paid 10/24/80
check # 1362
$ 2500.00

8 3 0 4 0 4 3 5 3 9

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703| 998|0334

September 25, 1980

676

NCPAC
1500 Wilson Blvd. #513
Arlington, Va. 22209

POSTAGE ADVANCE FOR ROLL--OUT OF 90K EPACO Best

$13,500.00

Paid 9/25/80
Check #2679
Amount $13,500.00

83040435396

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

67
62

Utahns for Dan Marriott
c/o Mr. Barry Nielson
1133 Longworth HOB
Washington, D.C. 20515

September 19, 1980

Job #0009 Invoice #657 A

| | | |
|---|---|---|
| Postage Paid | | $1.500.00 |
| | Total | $1,500.00 |

8304043539 1

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

Maryland Life-PAC
1001 Spring Street, #118
Silver Spring, MD 20910

September 10, 1980

ATTN: Mr. Jerry Myer

Invoice #641

For typesetting, printing, and layout of 4 page
"May 13th Primary Brochure"
Quantity 150,000

| | |
|---|---|
| | $4,704.00 |
| paid 6/11/80 Ck. #104 | 1,000.00 |
| Total Due | $3,704.00 |

* All invoices are due and payable upon receipt. All charges are payable 20 days from date of invoice. A service charge of 1.5% per month (equivalent to 18% per year) will be added to past due items.

Myer Ph.# 588-1497

paid 10/29/80 CH#124 704.00

$3000.00

paid 2/10/81 CH# 167 300.00

Balance Due $ 2700.00

8 3 0 4 0 4 3 5 3 9 2

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

National Conservative
Political Action Committee
1500 Wilson Blvd., Suite 513
Arlington, VA 22209

November 9, 1980

JOB #0002 Invoice #634

For production of 7752 Match Fill-in. Mail packages, including mailing services. Drop date 1/10/81

| | | | |
|---|---|---|---|
| Typing: | Inside address & salutation | .10/ea | $ 775.20 |
| Envelope: | | .08/ea | 620.16 |
| Mailing: | Collate/fold | .05/ea | |
| | Insert | .03/ea | |
| | Seal/mail | .02/ea | |
| | Stamp | .02/ea | |
| | Rubber stamp | .04/ea | |
| | | .16/ea | $1,240.32 |
| Set-up | | | 10.00 |
| Postage | | | $2,325.60 |
| | | TOTAL | $4,971.28 |

Paid
CK 2058 103.00
CK 2940 2645.68

103.00
3940.28
2645.68

Balance Due 1294.60

3304043539

Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

The Conservative Caucus
7777 Leesburg Pike
Falls Church, VA 22043

August 29, 1980

Invoice #629

For Telephone Center:

| | |
|---|---|
| Telephone Service & Equipment July & August (Partial) | $3,871.01 |
| Personnel: (For period ending 8/23/80) General Staff. | 8,666.78 |
| Taxes: (For payroll ending 8/23/80) | |
| FICA (662.48 x 2) | 1,324.96 |
| FED | 927.88 |
| Virginia | 168.76 |
| Zerox | 98.18 |
| Supplies | 383.81 |
| Advertising | 1,195.46 |
| Printing | 2,928.64 |
| Total Due | $19,565.48 |

All invoices are due and payable upon receipt.
All charges are payable 20 days from date of invoice. A service charge of 1.5% per month (equivalent to 18% per year) will be added to past due items.

paid
9-5-80
CM# 139
$19,565.48
9-4-80

8304043539

Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703| 998|0334

Americans For Change
218 N. Lee Sreet
Suite 319
Alexandria, Virginia 22314

August 19, 1980

Invoice #599

For 293 Urgent Grams Re:

Indianapolis Meeting

| | |
|---|---|
| Production @ .46/unit | $134.78 |
| Postage | 43.95 |
| Set-Up | 15.00 |
| | $193.73 |
| Postage pre-paid (credit) | - 43.95 |
| Total Due | $149.78 |

All invoices are due and payable upon receipt.
All charges are payable 20 days from date of invoice. A service charge of 1.5% per month (equivalent to 18% per year) will be added to past due items.

Paid 9-11-80
check #14
$2114.85

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

Americans For Change
218 N. Lee Street
Suite 319
Alexandria, Virginia 22314

August 11, 1980

Invoice #590

For 1198 Urgent Gram re: Washington D. C. Meeting Overnight by entry (extra).

| | |
|---|---|
| Production @.42/unit | $503.16 ✓ |
| Key Entry @.09/name | 107.82 |
| Verification | 23.96 |
| Set-up | 10.00 |
| Postage | 179.70 |
| 1 Run Xerox | 32.00 |
| Total | $856.64 |

paid check 1230
10/4/80
$ 1119.66
566 - 590-592

8 3 0 4 0 4 3 5 3 9 6

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703|998|0334

Americans For Nuclear
Energy
100 Park Washington Court
Suite 200
Falls Church, Virginia 22046

Pd 9-5-80
CHK 1152
$ 4678.40
A/30 600

August 11, 1980

Invoice #578

For Printing of Stationery. Envelopes, and Supplies for AFNE matched fill in house file mailing. Quantity, 9.5M

| | |
|---|---|
| Two page letter, front and back. 2 colors side one and for 8 1/2 x 11 Ivory Stock. | $551.65 |
| 3 1/2 x 6 1/4 Pledge 85# Stock | 264.00 |
| #9 Carrier Envelopes Regulars Ivory Stock | 332.42 |
| #7 Return Envelopes | 321.97 |
| Newspaper Insert | 392.18 |
| Tax | 74.49 |
| Misc. | |
| Negatives for Newsprint (cancellec at Jensen Press) | 25.00 |
| Compostion (Set Letterhead) | 20.00 |
| Delivery of Newpaper piece from Gaithesburg | 26.60 |
| Press Wash | 30.00 |
| Plates | 30.00 |
| MediAmerica | 100.00 |
| | $2,168.31 |

3 3 0 4 0 4 3 5 5 7 7

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

SENATOR LLOYD BENTSEN
RE-ELECTION COMMITTEE
P.O. Box 61202
HOUSTON, TEXAS 77208

JULY 31, 1980

INVOICE #564

405

FOR TYPING AND COLLATING 365 SINGLE PAGE LETTERS AND ENVELOPES RE: RECEPTION FOR TEXAS DELEGATION TO DEMOCRATIC NATIONAL CONVENTION.

| | | |
|---|---|---|
| TYPING 8 LINES @ .29/ea. | | 105.56 |
| PRINTING | 1000 LETTERHEAD | 177.84 |
| | 1000 ENVELOPES | 125.11 |
| | RUN UNION LABELS | 84.20 |
| | CRANE BOND STRATHMORE | |
| POSTAGE | | 54.60 |
| SET-UP | | 10.00 |
| COURIER | | 20.00 |
| | | 577.31 |
| | POSTAGE CREDIT | 57.00 |
| | TOTAL DUE | $ 520.31 |

Paid 8-4-80
Ck 1183
Amt 57.00

Paid in Full
8/8/80 - Ck # 1190
Deposited 8/11/80
Amt 520.31

** (ALL INVOICES ARE DUE AND PAYABLE WITHIN TWENTY DAYS OF INVOICE DATE. A SERVICE CHARGE OF 1.5% PER MONTH, EQUAL TO 18% PER YEAR, WILL BE ADDED TO PAST DUE BALANCES.)

8304043539E

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703|998|0334

THE RELIGIOUS ROUNDTABLE
1500 WILSON BOULEVARD
SUITE 502
ARLINGTON, VIRGINIA 22209

July 25, 1980

INVOICE # 558

405

FOR TYPING AND MAILING OF 1678 MEMORANDUMS IN REFERENCE TO MEETING FOR THE RELIGIOUS ROUNDTABLE.

| | |
|---|---|
| TYPING: | |
| PAGE 1, 29 lines @ .45 | 755.10 |
| PAGE 2, 13 lines @ .24 | 402.72 |
| KEYPUNCHING FOR 328 NAMES @ .14 | 45.92 |
| MAILING: | |
| FOLDING, REINSERT, INSERTING SEAL AND MAIL @ .15/package | 251.70 |
| COURIER | 15.00 |
| POSTAGE @ .28 each | 469.84 |
| TOTAL | $1,940.28 |
| POSTAGE CREDIT | 420.00 |
| BALANCE | $1,520.28 |

8304043539

**(ALL INVOICES ARE DUE AND PAYABLE WITHIN TWENTY DAYS OF INVOICE DATE. A SERVICE CHARGE OF 1.5% PER MONTH, EQUAL TO 18% PER YEAR, WILL BE ADDED TO PAST DUE BALANCES.)

paid 8-4-80
Amt 420.00
Ck# 1147

ERILA
Center Office Plaza 5
0 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 998-0334

The Congressional Club
P.O. Box 18848
Raleigh, NC 27619

July 15, 1980

Invoice #527

Telephone solicitations for Congressional Club house file names, @ $2.25 per gross name.

| | | |
|---|---|---|
| 10,000 x $2.25 | | $22,500.00 |
| | Partial Payment | 11,250.00 7/14/80 CK.# K5176 |
| | Balance Due | $11,250.00 |

All invoices are due and payable upon receipt.
All charges are payable 20 days from date of invoice. A service charge of 1.5% per month (equivalent to 18% per year) will be added to past due items.

Paid 8/28/80
chk 11397
$ 11250.00

3304043540

Americans for Change
218 North Lee Street
Suite 319
Alexandria, Virignia 22314

July 10, 1980

Invoice #519

Postage due for certified letter to priority list.

$200.00

Paid 7/10/80
Check #88-217

8304043540 1

AMERICA

Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 998-0334

Congressman Dan Marriott
1133 Longworth HOB
Washington, D.C. 20515
Attn: Barry Neilson

July 2, 1980

Invoice #513

Follow-up phone calls to invitation recipients for June 30, 1980 Washington PAC fundraiser.

| | |
|---|---|
| 627 calls @ .50 | $313.50 |
| .08 telephone fee | 50.16 |
| 132 Hand Addressed complimentary invitations to Congressmem @ .10 | 13.20 |
| Total Due | $376.86 |

All invoices are due and payable upon receipt.
All charges are payable 20 days from date of invoice. A service charge of 1.5% per month (equivalent to 18% per year) will be added to past due items.

paid 9-5-80
Amt 376.86
ck # 1213
date 8/25/80

3304043540

AMERICA

Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 998-0334

The Conservative Caucus
7777 Leesburg Pike
Falls Church, Virginia 22043

June 27, 1980

Invoice #508

| | | |
|---|---|---|
| **Telephone** | | |
| April | 1,723.54 | |
| May | 582.40 | |
| June | 5,750.37 | $ 8,056.31 |
| **Personnel** | | |
| General Staff 5/18/80-6/13/80 | | 4,431.51 |
| **Taxes** | | |
| FICA 5/18/80-6/13/80 312.99x2 | | 625.98 |
| FEDERAL 5/18/80-6/13/80 | | 341.30 |
| VIRGINIA 5/18/80-6/13/80 | | 83.81 |
| Xerox (June) | | 106.96 |
| Supplies | | 12.75 |
| Printing | | 2,406.56 |
| Bonus Plan for Operators | | 100.00 |
| Total Due | | $16,165.18 |
| 6/3/80 CK# 111 | | 8,000.00 |
| 7/15/80 CK# 114 | | 8,165.18 |

Deposited into Acct 052

All invoices are due and payable upon receipt.
All charges are payable 20 days from date of invoice. A service charge of 1.5% per month (equivalent to 18% per year) will be added to past due items.

23040435403

National Conservative Political
Action Committee
1500 Wilson Boulevard
Suite 515
Arlingotn, Virginia 22209

June 26, 1980

Invoice #507

Postage for Target 80 Package.

$1400.00

Postage

Paid 6/26/80
Check #2074

8 3 0 4 0 4 3 5 4 0 4

AMERICA

Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 998-0334

Congressman Dan Marriott
1135 Longworth HOB
Washington, D.C. 20515

June 23, 1980

Invoice #499

Mailing services for June 30, 1980 Congressional PAC fundraiser. Hand address carrier envelopes, insert, seal, stamp and mail 627 pieces.

| | | |
|---|---|---|
| Letter: | Hand address @ .10/env.<br>Insert @ .01/item<br>Fold @ .01/item<br>Stamp @ .01/item<br>Seal/Mail @ .02/item | $ 94.05 |
| Postage | | 94.05 |
| Invitation: | Hand address @ .10<br>Insert 3 pieces @ .03<br>Stamp @ .01<br>Seal/Mail @ .02 | 100.32 |
| Delivery | | 24.00 |
| Postage | | 94.05 |
| | Total Due | $406.47 |

All invoices are due and payable upon receipt. 1.5% interest charge after 20 days.

~~Inadvertently forwarded unpaid. RG.~~
~~Paid 8/4/80~~
~~Amt. 406.47~~
~~Ck# 2319~~

paid 9-5-80
Ck# 1212
Amt 406.47
Date 8/25/80

8304043540

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

6853400

Reagan For President Committee
901 South Highland Street
Arlington, Virginia 22204

July 25, 1980

Invoice #495

For National Telephone Fundraising services to 20,000 Reagan For President Committee contributors during November, 1979 and December, 1979.

$2.25/gross name ($2.25 x 20M)

Total Due $45,000.00

| | | |
|---|---|---|
| Paid on Account: | 1/7/80 | $10,000.00 |
| | 2/11/80 | $ 8,000.00 |
| | 2/22/80 | $ 8,535.83 |
| | 2/22/80 | $ 53.50 |
| | 5/9/80 | $ 3,000.00 |

Balance Due $15,410.67

All invoices are due and payable upon receipt.
All charges are payable 20 days from date of invoice. A service charge of 1.5% per month (equivalent to 18% per year) will be added to past due items.

8304043540

Paid in full
CK # 1529
$4000.00
10/10/80

Alexandria, Va. 22311
AMERICA
Phone 703|998|0334

REAGAN FOR PRESIDENT
COMMITTEE
9841 Airport Boulevard,
Suite 1430
Los Angeles, California 90045

January 28, 1980

INVOICE # 335**

FOR REAGAN FOR PRESIDENT COMMITTEE TELEPHONE FUNDRAISING PROJECT.

| | |
|---|---|
| TELEPHONE SERVICE AND EQUIPMENT | 7,011.81 |
| GENERAL STAFF | 4,207.95 |
| FICA ON GENERAL STAFF | 322.09 |
| ADMINISTRATOR (12-11-79 to 12-18-79 at 73.809 per diem) | 516.66 |
| MANAGER (12-11-79 to 12-18-79 at 47.618 per diem) | 333.32 |
| RENT ( 12-11-79 to 12-18-79 at 23.807 per diem) | 166.65 |
| Equipment (12-11-79 to 12-18-79) | |
| IBM Selectrics at 1.595/day | 11.17 |
| IBM Memories at 4.881/day | 34.17 |
| Xerox at 5.822/day | 40.75 |
| Char service at 10./week | 10.00 |
| Advertising | 201.82 |
| TOTAL | 12,856.39 |
| Minus Credit | 1,569.77 |
| | 11,286.62 |
| | 12.95 |
| | ~~11,297.57~~ |
| | 11,273.67 |
| ck# 4187 3/9/80 | 3000.00 |
| | 8273.67 |

** (DOCUMENTATION FOR THIS INVOICE IS ATTACHED)

8304354007

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703| 998|0334

National Small Business
Political Fund
P.O. Box 1454
Main Post Office
Washington, D.C. 20013
Attn: Barry Nielson

June 12, 1980

Invoice #489

June 9, 1980 Mailing

| | |
|---|---|
| 7 3 page letters @ 1.80/package | $12.60 |
| 9 4 page letters @ 2.21/package | 19.89 |
| Total Due | $32.49 |

All invoices are due and payable upon receipt.
1.5% interest due after 20 days.

paid 9-28-80
ck# 1018
$ 821.78
(Inv. 488)

33040435405

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

National Small Business
Political Fund
P.O. Box 1454
Main Post Office
Washington, D.C. 20013
Attn: Barry Nielson

June 12, 1980

Invoice #488

LETTER #1 (4 pages) 121 FULLY TYPED LETTERS

| | | | |
|---|---|---|---|
| Typing: | Pg. 1 31 lines @ .49 | | |
| | Underscoring @ .014 | | .50/pg. |
| | Pg. 2 43 lines @ .48 | | |
| | Underscoring @ .048 | | .52/pg. |
| | Pg. 3 43 lines @ .43 | | |
| | Underscoring @ .018 | | .45/pg. |
| | Pg. 4 16 lines @ .18 | | |
| | Underscoring @ .01 | | .19/pg. |
| Key Entry: | Original data verification | | |
| | address creation | | .16/name |
| Mailing Service: | Collating | .01/item | |
| | Folding | .03/item | |
| | Inserts | .03/item | |
| | Seal/Mail | .02/item | |
| | Stamp | .02/item | .11/package |

Total Cost Per Package (LETTER #1) $1.93

LETTER #2 (3 pages) 118 FULLY TYPED LETTERS

| | | |
|---|---|---|
| Typing: | Pg. 1 30 lines @ .45 | |
| | Underscoring N/C | .45/pg. |

83040435405

| | | |
|---|---|---|
| Pg. 2 46 lines @ .52<br>Underscoring @ .024 | | .544/pg. |
| Pg. 3 21 lines @ .27<br>Underscoring N/C | | .27/pg. |
| Key Entry: Original data verification<br>address creation | | .16/name |
| Mailing Service: Collating | .01/item | |
| Folding | .02/item | |
| Inserts | .03/item | |
| Seal/Mail | .02/item | |
| Stamping | .02/item | .10/package |

Total Cost Per Package (LETTER #2) $1.52

| | | |
|---|---|---|
| Postage | .28 Carrier | $ 66.92 |
| | .15 BRE | 35.85 |
| Total Letter #1 | | 233.53 |
| Total Letter #2 | | 179.36 |
| Printing<br>#6 Wallet, 1 Color | | 281.35 |
| Handling | | 28.13 |
| | Total | $825.14 |
| | Credit (Postage) | 35.85 |
| | Total Due | $789.29 |

All invoices are due and payable upon receipt.
1.5% interest charge after 20 days.

paid
8/28/80
ck #1018
$ 821.78
(489)

8 3 0 4 0 4 3 5 4 1 C

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

Charles Orndoff
7777 Leesburg Pike
Vienna, Virginia 22043

May 30, 1980

Invoice #476

| | | |
|---|---|---|
| **TELEPHONE:** | | |
| April | $2,419.72 | |
| May | $7,097.47 | $ 9,517.19 |
| **PERSONNEL:** | | |
| General Staff thur 5/17 | | 3,163.99 |
| **TAXES:** | | |
| FICA thru 5/17 230.71 x 2 | | 461.42 |
| FED thru 5/17 | | 298.70 |
| Va. thru 5/17 | | 66.03 |
| Va. Employment commission first quarter | | 17.66 |
| Xerox | | 125.62 |
| Supplies | | 9.53 |
| Printing | | 1,693.89 |
| Adveristing | | 39.20 |
| Total Due | | $15,393.23 |

4007.80 6/6/80
11385.43 CE#176

All invoices are due and payable upon receipt.
1.5% interest charge after 20 days.

Pd. 6/11/80
CE#197

3304043541 1

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

The Conservative Caucus Foundation
422 Maple Avenue, East
Vienna, Virginia 22180

May 21, 1980

Invoice #469

For follow-up corespondence for TCCF telephone solicitation project.

Total number of follow-up letters

| | |
|---|---|
| 1st letter 1804 @ .31 each | $ 559.24 |
| 2nd letter 1804 @ .31 each | 559.24 |
| Postage for 3608 @ .15 | 541.20 |
| Total Due | $1,659.68 |

All invoices are due and payable upon receipt.
1.5% interest charge after 20 days.

Pd. 5/29/80
ck# 3162

3304041541 2

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

Conservative Against Liberal
Legislation
1500 Wilson Boulevard
Suite 515
Arlington, Virginia 22209
May 19, 1980

**Invoice #466**

| | | |
|---|---|---|
| Typing Service (For 20,620 only) | | |
| First Page - 27 Lines @ .45/page Includes Typing Address on Envelope, Inside Address, Date, Salutation, and closing | $ 9,279.00 | paid 8-28-80 CH# 735 |
| Second Page - 9 Lines @ .20/page | 4,124.00 | |
| Variable Inserts: 3 @ .025/each | 1,649.60 | |
| Typing of Memorandum @ .10/each | 2,062.00 | $ 23325.00 |
| Mailing Service | | |
| Coalate, Paper Clip and Insert 5 Pieces (2 Postcards, Bre, Senators List, Kissinger Article @ .06/each | 1,237.20 | |
| Fold, Coalate, and Insert 4 Page Letter Set @ .05/each | 1,031.00 | paid 8-1-80 CH# 701 |
| Fold and Insert Reply Devise @ .02/item | 412.40 | Amount 2000 - |
| Apply Live Postage 10M (28¢ Stamps) 100.00 10,620 (15¢ stamps) 212.40 | 312.40 | Balance Due 2325.00 |
| Sealing and Mailing @ .02/item | 412.40 | |
| Special Handling | | |
| Stamp Live "Sensitive" and Initial "RKS" @ .03/each | 618.60 | |
| Apply Sealing Wax @ .05/each | 1,237.20 | |
| Copy Writing and Package Design ✓ + 100.00 | ~~1,031.00~~ | |
| | $23,406.80 | |
| Credit for Memorandums | 1,000.00 | |
| Total Due | ~~$22,406.80~~ | |
| | 50.00 | 3 hrs past minutes |
| | 21,325.80 | |
| pd. 6/2 ck# 6316 | 6500.00 | Due 6825.80 |
| | 14,775.80 | 9/22/80 2500.80 ck#697 |
| pd 6/16/80 ck# 6516 | 3,000.00 | |
| | 11,825.80 | 4825.00 Due |
| pd. 6/27/80 # 658 | 5500.00 | |

8304043541

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703|998|0334

CALL
1500 Wilson Boulevard
Suite 515
Arlington, Virginia 22209

May 14, 1980

Invoice #465

| | |
|---|---|
| Printing and Supplies (All Stationary 25% Strawbridge Bond) | |
| 104M 8 1/2 x 11 Stationary (4 Page) | $2569.56 |
| 52M Postcards, 26M Reply Devise, 26M List of Senators, 26M H. Kissinger Articles | 2574.00 |
| 26M Carrier Envelopes, 26M Return Envelopes | 1457.51 |
| Sensitive Stamp | 21.55 |
| Computer Tape Conversion | 105.00 |
| Sealing Wax @1.84/stick 79 Sticks Used | 145.36 |
| Paper Clips at 10.20/M | 214.20 |
| 4 Canisters Propane Gas @ 2.99/ea. | 12.44 |
| Red Ink | 4.25 |
| Total Due | $7103.87 |

All invoices are due and payable upon receipt.
1.5% interest charge after 20 days.

Pd. 6/2/80
CC# 637

8304043541

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

National Conservative Political
Action Committee
1500 Wilson Boulevard
Suite 513
Arlington, Virginia 22209

May 12, 1980

Invoice #460

For If Cranston Wins, You Lose California Prospect - 40,000. Shipped May 2, 1980.

| | |
|---|---|
| Printing: | |
| 80M #10 window envelopes and #9 BRE's | $1,715.28 |
| 40M 14 1/2 x 22 newspaper ads and 40M victory cards | 2,618.00 |
| 40M 3 Page letters | 1,476.91 |
| Mailing Service + application of pennies | 1,467.89 |
| MediAmerica | 500.00 |
| Total Due | $7,778.08 |
| 7/9/80 ck. # 2140 | 2611.30 |
| | 5166.78 |
| 7/11/80 ck# 2159 | 3000.00 |
| | 2166.78 ← |

All invoice are due and payable upon receipt.
1.5% service charge after 20 days.

PAID 8/11/80
Ck # 2319
2166.78 -

8 3 0 4 0 4 3 5 4 1 5

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703|998|0334

paid 4392.59
CHK 190
5/12/80

The Conservative Caucus
7777 Leesburg Pike
Falls Church, Virginia 22043

May 7, 1980

402

Invoice #455

| | |
|---|---|
| **Personnel** | |
| General Staff thru May 5,1980 | $3383.76 |
| **Taxes on Personnel** | |
| **Fica;** | |
| May: 240.27 x 2 = 480.54 (thru May 5 only) | 480.54 |
| **FED** | |
| May: 255.30 (thru May 5,only) | 255.30 |
| **Virginia Whitholding** | |
| May: 53.28 (thru May 5 only) | 53.28 |
| **Supplies** | |
| Diamond Paper | 10.84 |
| **Advertising** | |
| Washington Post | 170.25 |
| **Equipment** | |
| Xerox | 38.62 |
| Total Due | $4392.59 |

All invoices due and payable upon receipt.
1.5% service charge after 20 days.

8304043541 6

MEDIAMERICA
Mark Center Office Plaza 5
1800 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703|998|0334

National Conservative Political
Action Committee
1500 Wilson Boulvard
Suite 513
Arlington, Virginia 22209

April 30, 1980

Invoice #450

For 5000 fully typed letters to NCPAC house file.
Apology letter signed by John T. Dolan.

| | | | |
|---|---|---|---|
| Page 1: | 30 lines at .45/page | | $ 2250.00 |
| | 1 insert .025/each | | 125.00 |
| Page 4: | 37 lines at .44/page | | 2200.00 |
| | 1 variable insert at .025/each | | 125.00 |
| Memorandum: | 27 lines at.27/each | | 1350.00 |
| | name/add. at .05/each | | 250.00 |
| Mailing: | Fold four page letter | .04 | |
| | Insert 3 pieces | .03 | |
| | Affix postage | .08 | |
| | ( carrier and RAE) | | |
| | Sealing and Mailing | .02 | |
| | Total Mailing | | 850.00 |
| Printing Costs: | Letterhead stationery | | 1020.19 |
| | Reply memorandum | | 299.52 |
| | Paper stock for typed memo 11.20/M | | 56.00 |
| | Cutting Paper stock | | 20.00 |
| Courier Services | | | 30.00 |
| | Total Due | | $ 8575.71 |
| | | | 6765.00 |
| | | | 1810.71 |
| | | | 1810.71 |

All invoices are due and payable upon receipt.
1.5% interest charge after 20 days.

ck #s 1599 1583
5/16/80
5/23/80
#1611

8304043541 7

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703| 998|0334

Conservatives Against Liberal
Legislation
1500 Wilson Boulevard
Suite 515
Arlington, Virginia 22209

April 28, 1980

Invoice #446

Postage for CALL D.M. Pieces 10,000 Units.
.28/each

$ 2800.00

Paid 4/28/80
CK# 68-111

3304043541 5

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

The Conservative Caucus
7777 Leesburg Pike
Falls Church, Virginia 22043

April 25, 1980

Invoice #441

For May, 1980 expenses for TCC Phone Center

| | |
|---|---|
| Administrator | $ 1550.00 |
| Manager | 1166.66 |
| Rent (May) | 500.00 |
| IBM Selectric | 33.50 |
| Total Due | $ 3250.16 |

All invoices are due and payable upon receipt.
1.5% interest charge after 20 days.

PAID 5/2/80
CK #183

8 3 0 4 0 4 3 5 4 1 5

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

The Conservative Caucus
7777 Leesburg Pike
Falls Church, Virginia 22043

April 23, 1980

Invoice #436

| | |
|---|---|
| **Telephone Service and Equipment** | |
| April: Bill Date April 4/80 | $ 2,693.73 |
| **Personnel** | |
| General Staff thru April 20,1980 | 2,442.35 |
| **Taxes On Personnel** | |
| **FICA** | |
| April: 171.95 x 2= 343.90 (thru 4/20 only) | 343.90 |
| **FED** | |
| April: 155.80 (thru 4/20 only) | 155.80 |
| **Virginia Witholding** | |
| April: 35.18 (thru 4/20 only) | 35.18 |
| **Printing** | |
| Suburban Printing | 370.24 |
| **Advertising** | |
| Arone Publications | 21.20 |
| Total Due | ~~$ 6,06.40~~ 6,062.40 |

PAID 4/25/80
CK # 182

8 3 0 4 0 4 3 5 4 2 0

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

National Conservative Political
Action Committee
1500 Wilson Boulevard
Suite 513
Arlington, Virginia 22209

April 17, 1980

Invoice #428

| | | |
|---|---|---|
| 1. | Postage for If Cranston Wins You Lose package mailed on Pat Nolens stationery at 128/unit | $ 4,200.00 |
| 2. | Postage for 40,000 If Cranston Wins You Lose Packages at 8.4/unit | 3,360.00 |
| | Pennies for 40,000 packages. | 400.00 |
| | Total Due | $ 7,960.00 |

Paid 4/23/80
Ck# 1673, 1671

83040435421

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

National Conservative Political
Action Committee
1500 Wilson Boulevard
Suite 515
Arlington, Virginia 22209

April 15, 1980

Invoice #426

Postage for apology letter from John T. Dolan.
Job size 5653, .15¢ carrier, .15¢ for RAE.
Handled through RAVCO.

| | |
|---|---|
| 5653 at .30/item | $1,695.90 |
| Total Due | $1,695.90 |

All invoices are due and payable upon reciept.
A service charge of 1.5% will be applied to all
invoices on the 30th day following date of invoice.

PAID 4/17/80
CK # 8888

8 3 0 4 0 4 3 5 4 2 2

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703|998|0334

National Conservative Political
Action Committee
1500 Wilson Boulevard
Arlington, Virginia 22209

April 4, 1980

Invoice #418

2065 fully typed direct mail packages for "Target 80" program. Mail Date: 4/4/80, Drop Date 4/4/80

| | | |
|---|---|---|
| Printing: | 9 x 12 carrier envelopes | $280.38 |
| | Pg. 1 - Pg. 4 | 601.12 |
| Page 1 : | Typing (28 lines including 9 x 12 envelopes) .50/item | 1032.50 |
| | Underscoring .03/item | 61.95 |
| | Variable insert .025/item | 51.63 |
| Page 4: | Typing (42 lines) .48/item | 991.20 |
| | Variable insert .025/item | 51.63 |
| Reply Memo | (26 lines) .27/item | 557.55 |
| Mailing: | Affix label<br>Collating 9 pieces<br>Inserts 5 pieces<br>Stamp/seal/mail<br>Reopen-reinsert<br>Reply memo .22/item | 484.00 |
| Tape Conversion: | (programming overtime) | 452.00 |
| | Total Due | $ 4563.96 |

5/23/80/ck# 1611 1700.00
2863.96
6/16/80/ck# 1687 1400.00
1463.96
6/23/80 ck# 1711 600.00
863.96
7/2/80 ck# 1731 863.96

pd. in full

3304043542 3

MEDIAMERICA
Mark Center Office Plaza 6
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703| 998|0334

National Conservative Political
Action Committee
Suite 513
1500 Wilson Boulevard
Arlington, Virginia 22209

April 9, 1980

Invoice # 416

| | |
|---|---|
| ARTWORK FOR NCPAC STATIONARY | $175.00 |
| MEDIAMERICA | 75.00 |
| TOTAL DUE | $250.00 |

Paid CK # 3071
$32,047.80
11/14/80

33040435424

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

The Conservative Caucus
7777 Leesburg Pike
Falls Church, Virginia
Re: Acct# 061-88-052

April 7, 1980

Invoice #414

For April, 1980 expense for TCC Phone Center

| | | |
|---|---|---|
| Administrator | | 1550.00 |
| Manager | | 1166.66 |
| Rent (April) | | 500.00 |
| IBM Selectric | | 33.50 |
| | Total | 3250.16 |

8 3 0 4 0 4 3 5 4 2 5

PAID 4/25/80
CK# 182

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

National Conservative Political
Action Committee
1500 Wilson Boulevard
Suite 515
Arlingotn, Virginia 22209

March 26, 1980

Invoice #409

Additional postage required for Target "80" high $ direct mail solicition (ref: invoice #392) actual postage 41¢ for carrier, 15¢ for BRE. Handled through RAVCO.

| | |
|---|---|
| Total Postage | $1,120.00 |
| Credit (#392) | 860.00 |
| Balance Due | $ 260.00 |

pd. 4/3/80
CK# 1461

8304043542

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

December 30, 1980

Republican Recount Committee
% P/M Productions
218 North Lee Street
Alexandria, Virginia 22314

ATTN: Mr. Brad O'Leary

Job #0088 Invoice #783

Phil Crane mailing to Indiana, Illinois, Florida, Ohio, Connally Finance and California Lists. Drop count 3000. Drop date 12/26/80.

| | | | |
|---|---|---|---|
| Printing: | 3000 letter head 1 color<br>Pages 1 & 2 1 color | | $ 426.00 |
| | 3000 Carrier Envelopes | | 267.00 |
| | 3000 BRE's | | 169.00 |
| | 3000 Reply Cards | | 112.00 |
| | | | $ 974.00 |
| | 10% Handling - MediAmerica | | 97.40 |
| Typing: | 3000 1st page @ .45/each | | 1,350.00 |
| Mailing: | Insert | .02 | |
| | Collate | .03 | |
| | Fold | .02 | |
| | Seal/Mail | .02 | |
| | Stamp | .01 | |
| | | .10/unit | 300.00 |
| Postage: | .15/each (3000) | | 450.00 |
| | | TOTAL DUE | $ 3,171.40 |

paid 5/11/81 check 10414 $3171.40

All invoices are due and payable upon receipt. All charges are payable 20 days from date of invoice. A service charge of 1.5% per month (equivalent to 18% per year) will be added to past due items.

23040435427

AMERICA

Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 998-0334

paid ck # ~~[illegible]~~ 478
5/27/81 $1880.26

Congressman Jim Jeffries
Cannon HOB
Room #128
Washington, D.C. 20515

June 23, 1980

| | | |
|---|---|---|
| Invoice #120 | | $3744.50 |
| Invoice #120 | | 56.50 |
| Finance Charge 1.5% per month from October 1978 (17 months) | | 912.16** |
| | Sub Total | $4713.16 |
| | Paid on Account Ck.#102 3/6/80 | 1000.00 |
| | Sub Total | $3713.16 |
| | Interest thru 6/6/80 | 167.10** |
| | Sub Total | $3880.26 |
| | Paid on Account 6/18/80 Ck.#118 | 2000.00 |
| | Total Due | $1880.26 |

(403)

**Please note corrected interest charge.

All invoices are due and payable upon receipt.
All charges are payable 20 days from date of invoice. A service charge of 1.5% per month (equivalent to 18% per year) will be added to past due items.

8 3 0 4 0 4 3 5 4 2 8

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703| 998|0334

The Conservative Caucus
7777 Leesburg Pike
Falls Church, Virginia 22043

March 25, 1980

Invoice #408

| | |
|---|---|
| Telephone Service and Equipment For March, 1980 | $ 7,975.98 |
| **Personnel** | |
| General Salaries thru March 22, 1980 only | 3,280.96 |
| **Taxes** | |
| FICA 238.21 x 2 (thru 3/22/80 only) | 476.42 |
| FED (thru 3/22/80 only) | 294.00 |
| VA (thru 3/22/80 only) | 72.41 |
| **Follow-up Letters** | |
| Letters thru March 18, 1980 | 1,988.24 |
| Sub Total | $14,088.01 |
| Postage Credit | (159.30) |
| Total Due | $13,928.71 |

Mailing thru 3/7/80.

All invoices are due and payable upon receipt.

Pd 4/7/80
CK# 177

93040435429

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703|998|0334

National Conservative Political
Action Committee
1500 Wilson Boulevard
Suite 515
Arlington, Virginia 22209

March 24, 1980

Invoice #404

Production 992 follow-up invitation letters to Kansas City briefing held March 28, 1980. Signators: Roger Jepsen (Iowa), and Congressman Jim Jeffries (Kansas). Mailing service provided.

| | | |
|---|---|---|
| Jepsen Letter: | | |
| 38 lines @ .53/unit x 496 | | $261.88 |
| Mailing @ .05/unit x 496 | | 24.80 |
| | Sub Total | 286.68 |
| Jeffries Letter: | | |
| 30 lines @ .45/unit x 496 | | 223.20 |
| Mailing @ .05/unit x 496 | | 24.80 |
| | Sub Total | 248.00 |
| Postage | | 148.80 |
| | Total Due | $683.48 |

All invoices are due and payable upon receipt.

PAID 5/1/80
CK# 1700

3304043543 0

MediAmerica, Inc.
1900 North Beauregard Street
Suite 12
Alexandria, Virginia 22311
March 17, 1980

National Conservative Political
Action Committee
1500 Wilson Boulevard
Suite 513
Arlington, Virginia 22209

6 3 0 4 0 4 3 5 4 3 1

Invoice #392

Postage for Target "80" high $ dircet mail solicitation. Job sixe approximately 2000, 28¢ for carrier, 15¢ for RAE. Handled through RAVCO. Mail drop date on or about 3/25/80.

Total Due $860.00
300
560.00

All invoices are due and payable upon receipt.

pd. 3/24/80
ck# 1498

MediAmerica, Inc.
1900 North Beauregard Street
Suite 12
Alexandria, Virginia 22311
March 12, 1980

The Conservative Caucus
7777 Leesburg Pike
Falls Church, Virginia 22043
Attn: Charles Orndorff

Invoice #391

Telephone Service and Equipment

| | |
|---|---|
| January: | |
| Bill Date January 1, 1980 3887.18 | |
| Bill Date January 4, 1980 664.64 | |
| Febuary: | |
| Bill Date February 1, 1980 4473.98 | |
| Bill Date February 4, 1980 1128.90 | $10,154.70 |
| **Personnel** | |
| General Staff thru March 8, 1980 only | 2,662.31 |
| Administrator (March) | 1,550.00 |
| Manager (March) | 1,166.66 |
| **Taxes on Personnel** | |
| FICA | |
| January: 332.31 x 2 = 664.62 | |
| February: 733.93 x 2 = 1,467.86 | |
| March: 194.06 x 2 = 388.12 (thru 3/8/80 only) | 2,520.60 |
| FED | |
| January: 679.80 | |
| February: 812.80 | |
| March: 222.30 (thru 3/8/80 only) | 1,714.90 |
| Virginia Witholding | |
| January: 49.74 | |
| February: 169.18 | |
| March: 60.71 (thru 3/8/80 only) | 279.63 |

3 3 0 4 0 4 3 5 4 3 2

**Rent**
January: PAID
February: PAID
March: 500.00 — 500.00

**Equipment**
Xerox (February) — 130.97
IBM Selectric (March) — 33.50

**Printing**
Surburban
1M Telephone Sheets
10M From The Desk Of Chris
20M #9 BRE's
20M #10 Window Envelopes
20M Reply Cards — 1,304.16

**Supplies**
S.O.S. — 82.21

**Advertising**
Arone Publications 29.25
Sentinel Publications 11.80
Washington Post 27.74 — 68.79

**Follow-up Letters**
Mailed through March 10, 1980
1529 at 31¢ each (Stamps provided by tcc)
3585 at 46¢ each included postage — 2,123.09

3/19 — Total Due — $24,291.52
15,000.00
Balance Due — 9,291.52

All invoices are due and payable upon receipt.

3/14/80
CK# 174

pd. 3/27/80
CK#2761

TU C

8304043543

Mark Center Office
1900 N. Beauregar Suite 12
Alexandria, Va. 223
AMERICA
Phone 703|998|0334

New England Conservative
Political Action Committee
167 S. River Road
Bedford, N.H. 03102

Attn: Rick Reed

February 11, 1980

Invoice #361

For Telephone Center, calling for reception and dinner.

Total Due $1150.00
Paid 2/14/80
Check #216
#223

8 3 0 4 0 4 3 5 4 3 4

Mediamerica, Inc.
Mark Center Offic[illegible]
1900 N. Beaurega[illegible], Suite 12
Alexandria, Va. 2231[illegible]
AMERICA
Phone 703|998|0334

Citizens For Buckley
Village Green
Salisbury, CT. 06068

Attn: Bruce Smith

February 11, 1980

Invoice #360

Citizens for Buckley. Telephone Center Test.

Total Due $2000.00
Paid 2/14/80
Check #5042

3304043543

Mail Center Office
1900 N. Beauregard Suite 12
Alexandria, Va. 22311
AMERICA
Phone 703|998|0334

National Conservative Political
Action Committee
1500 Wilson Boulevard
Suite 513
Arlingotn, Virginia 22209

February 14, 1980

Invoice #359

For postage on NCPAC membership renewal robo package.
(Additonal postage)

$750.00

pd. 2/20/80
ck# 1293

83040435436

Mark Center Office [illegible]
1900 N. Beauregard [illegible], Suite 12
Alexandria, Va. 22[illegible]
MEDIAMERICA
Phone 703|998|0334

Committee To Re-Elect Mickey Edwards
10812 North May Avenue
Suite E
Oklahoma City, Oklahoma 73102

February 8, 1980

Invoice #358

| | |
|---|---|
| Postage (1700) | $ 225.00 |
| Labor/(addressing & calling) | 299.25 |
| Capitol Hill Club | 855.90 |
| Supplies (labels) | 2.95 |
| Courior Service | 12.80 |
| Telephone Bill (.08 x 2000) | 160.00 |
| Telegrams | 26.30 |
| Follow-up letters (150 at .50 ea) | 75.00 |
| Postage for follow-up | 22.50 |
| Printing | 565.52 |
| MediAmerica | 1,500.00 ~~2,000.00~~ |
| Total Due | ~~$4,245.22~~ 3,745 22 |

3/22/80 KED CORRECTION

Pd. 4/15/80 CK# 335

All acounts are due and payable upon receipt.

3304043543 7

Mark Center O[illegible]
1900 N. Beaure[illegible]t, Suite 12
Alexandria, Va. 22[illegible]
AMERICA
Phone 703|998|0334

Arena For Congress
Spiro Jankovich
Tilston Roberts Corporation
Calver and Redwood Streets
Baltimore, Maryland 21202

February 7, 1980

Invoice #355

For copy changes and editing.
Joe Arena For Congress Brochurd.

Total Due $100.00

All invoices are due and payable upon receipt.

Pd 2/21/80
CK# 124

8304043543

Mark Center Office P
1900 N. Beauregard , Suite 12
Alexandria, Va. 2231
AMERICA
Phone 703|998|0334

The Conservative Caucus Research
Analysis, and Education Foundation
422 Maple Avenue, East
Vienna, Virginia 22180

January 30, 1980

Invoice #332

For telephone fundraising project.

| | | |
|---|---|---|
| Telephone Service and Equipment | | $1,485.36 |
| Personnel | | 121.68 |
| FICA | | 7.46 |
| Equipment | | |
| IBM Memeories | (64.14) | |
| Xerox | (42.90) | 107.04 |
| Telepost | | 3,916.85 |
| Printing | | 365.04 |
| Advertisisements | | 109.09 |
| Supplies | | 33.00 |
| Total | | $6,145.52 |

PD 2/20/80
CK# 2829

8304043543

Mark Center Office Plaz
1900 N. Beauregard S Suite 12
Alexandria, Va. 2231
AMERICA
Phone 703 998 0334

1/8/79

National Conservative Political
Action Committee
1500 Wilson Blvd.
Suite 513
Arlington, Va. 22209
Atten: Becky

**Invoice # 320**

| | |
|---|---|
| Postage for John Porter Direct Mail Package | $ 612.60 |
| Key and Verify NCPAC High $ List + Hard Copy Cross Referance Verification 2838 names/18.5 per | 525.03 |
| Total | $1,137.63 |
| pd on account ck# 1056 1/8/79 | 612.60 |
| | due 525 03 |
| | pd. 2/14/80 ck#1246 |

Payable Upon Receipt

Mark Center Office Plaza
1900 N. Beauregard St. Suite 12
Alexandria, Va. 22311
AMERICA
Phone 703|998|0334

Reagan For President Committee
1828 L Street, N.W.
Suite 201
Washington, D.C. 20036

December 18, 1979

Invoice #314

For Reagan For President Telephone Center. Expenses to date.

| | |
|---|---|
| Telephone Service and Equipment (reflects receipt of recent bill of $2,121.96) | $9,131.16 |
| Staff: | |
| General Staff and Locating (reflects recent pay period of $2,325.90) | 8,554.84 |
| FICA on Labor (reflects recent FICA of $138.90) | 520.34 |
| Administrator | 2,066.66 |
| Manager | 1,333.33 |
| Rent | 666.60 |
| Equipment: | |
| IBM Selectrics | 44.66 |
| IBM Memiores | 128.27 |
| Xerox | 163.02 |
| Supplies | 112.34 |
| Printing (BRE's, Carriers, NCR Cards) | 927.00 |
| Postage | 600.00 |
| Telepost Mailgrams | 2,245.80 |
| Miscellaneous (courier 7.61, char service $40.00) | 47.61 |
| Total Due | $26,541.63 |

PD. 2/22/80
CK# 16-77

1/1/80 ck# 1004 PD. ON ACCOUNT 10,000.00
16,541.63
2/11/80 ck# 1393 pd. ON ACCOUNT 8000.00
8541.63
BALANCE DUE

83040435441

MEDIAMERICA
5300 Eisenhower Avenue, Suite 1960, Alexandria, Virginia 22304
(703) 823-1661

Jeff Bell For Senate Committee
212 West State Street
renton, New Jersey 08608

12/2/79

402

**INVOICE #304**

For costs for Jeff Bell telephone fundraising center.

| | |
|---|---|
| Administration (included in invoice #274) | N/C |
| Manager (included in invoice #274) | N/C |
| Personnel | $2,154.22 |
| FICA on personnel | 117.79 |
| Rent (Novmeber) | 250.00 |
| IBM Selectric (November) | 33.50 |
| Telephone Service and Equipment (current billing not available) | |
| Char Service | 30.00 |
| Equipment (memories only) | 128.27 |
| Supplies (printing) | 387.16 |
| TOTAL | $3,100.94 |
| 11/21/80 Ck# 2535 | − 800.00 |
| | 2300.94 |
| | + 172.55 |
| | 2473.49 |

6/27/80 1.5% Jan-June

Paid 9-4-80 CM# 2473.49 2681

8304043544 2

The Washington Legal Foundation
1712 I. Street N.W.
Wahhington, D. C. 20005

September 3, 1979

**Invoice # 256**

For telephone fundraising expenses from August 1, 1979 to date.

| | |
|---|---|
| Telephone Service & Equipment | $2,624.75 |
| Personnel: | |
| General Staff | 4,966.99 |
| Administrator (August) | 1,550.00 |
| Manager (August) | 1,000.00 |
| FICA on Personnel (324.53 x 2) | 649.06 |
| Rent for August | 250.00 |
| Advertising | 7.08 |
| Poatage | 300.00 |
| Equipment (copier & memories) | 136.50 |
| Equipment (IBM Selectric) | 33.50 |
| Supplies | 108.17 |
| Sub-total | $11,626 .05 |
| Credit for Invoice # 232 | 2,500.00 |
| Total | 9,126.05 |
| | 2 000.05 |
| 10/4/79 ck.1089 | 7126.05 |
| 10/15/79 ck 1014 | 1000.00 |
| | 6126.05 |
| ck#1029 | 2000.00 |
| | 4126.05 |
| ck# 1048 12/12/79 | 1000.00 |
| | 3126.05 |
| ck# 1070 1/21/80 | 3126.05 |

(Ref: cks.867-1137)

LAW OFFICE OF
EVERETT W. GRAY
38 COLUMBIA STREET
BANGOR, MAINE 04401
TELEPHONE
207-942-4883

March 18, 1981

Ms. Shirley King, Accountant
MediAmerica
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311

Re: Buddy Frankland; Herman C. Frankland and/or Frankland for Governor Committee

Dear Ms. King:

This will acknowledge the acceptance of Mr. Frankland and the Frankland for Governor Committee of the offer your company has made to settle this claim in full for $500.00, as set forth in your letter of March 11, 1981.

Accordingly, I enclose herewith the Committee Check No. 674 dated March 18, 1981 in the original sum of $500.00.

The Committee, Mr. Frankland and the undersigned wish to express our grateful appreciation for your very kind assistance in solving a most difficult dilemma for the candidate.

Very truly yours,

E. W. Gray

Everett W. Gray

EWG:lmd

Enclosure

Pmtd
MH 3/18/81
MH 674
$500.00

93040435444

Hermon 947-8[illegible]3

STATEMENTICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703| 998|0334

947-8863

Buddy Frankland
Bangor Baptist Church
Outer Broadway
Bangor, Maine

Bt #1 Box 6
Outer Broadway 04401
Bangor Maine
04401

September 12, 1980

Invoice #298

Revised invoice to reflect Invoice #'s 170, 117, 119, 122, 154, and 148.

| | |
|---|---|
| Total Due | $4604.62 |
| Paid on Acct. Ck. #'s 661, 663, 666, & 668. | 1300.00 |
| | 3304.62 |
| Interest 1.5% x 16 months | 1105.12 |
| Balance Due | 4409.74 |

Thank you for your payment of September 5, 1980, however this account is past due and we would appreciate immediate payment.

$2000 - 3-4/k

/ Work 947-6576 9-5

77

8 3 0 4 0 4 3 5 4 4 3

(4a)

First Meeting

1900 L. Beauregard
Suite 12A

August 18, 1980

- Committee Mailing -

1.A. Initial budget 8,800.00 —

1. Mail date 1st prospect
(A) Week of Sept. -

2. Lists - IDR will compile
w 10M for first Mailing

3. Lists of people to request
$ from in order to pay for first
Mailing

1) John Dolan - 100.00
2) G. Lee 50
3) IDR 50
4) RLS 50
5) Hoitlings 100.00

3304043544 6

National Republican
Candidates' Committee

1400 N. BEAUREGARD STREET • ALEXANDRIA, VA. 22311

(5)

December 29, 1980

Senator-elect Al D'Amato
1697 Broadway
New York, New York 10019

Dear Senator-elect D'Amato,

Please find enclosed herewith our check in the amount of $500 to assist in the retirement of your campaign debt.

We are pleased to be able to assist in this endeavor. If we can be of further assistance, please contact me personally.

Very truly yours,

John D. Romanin,
Treasurer

JDR:cjp
Encl.

8304043547

PAID FOR BY THE NATIONAL REPUBLICAN CANDIDATES COMMITTEE.
NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE

3 3 0 4 0 4 3 5 4 4 8

NATIONAL REPUBLICAN CANDIDATES COMMITTEE
P.O. 995-5270
1900 NORTH BEAUREGARD STREET
ALEXANDRIA, VIRGINIA 22311

December 23, 1980

68-138
500

THE SUM 500 DOLS 00 CTS

PAY _____ DOLLARS $ 500.00

TO THE ORDER OF

D 'AMATO FOR SENATE COMMITTEE

⑆056001066⑆ ⑈0[illegible]⑈ J.D. ROMANIN TREAS.

NATIONAL REPUBLICAN CANDIDATES COMMITTEE

DELUXE - FORM WVC-3 V-3

| | | |
|---|---|---|
| | CONTRIBUTION | |

PH. 998-5278
1000 NORTH BEAUREGARD STREET, SUITE 12
ALEXANDRIA, VIRGINIA 22311

December 23, 1980

68-108
560

THE SUM 500 DOLS 00 CTS

PAY _____ DOLLARS $ 500.00

TO THE ORDER OF

D 'AMATO FOR SENATE COMMITTEE

⑆056001066⑆ ⑈050⑈38 1⑈9⑈ J.D. ROMANIN TREAS.

NATIONAL REPUBLICAN
CANDIDATES COMMITTEE

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY NO RECEIPT DESIRED

DELUXE - FORM WVC-3 V-2

| DATE | DESCRIPTION | AMOUNT |
|---|---|---|
| | CONTRIBUTION | |

830401354145

Candidates' Committee

1900 N. BEAUREGARD STREET • ALEXANDRIA, VA. 22311

December 29, 1980

Senator-elect Paula Hawkins
P. O. Box 12637
Tallahassee, Florida 32308

Dear Senator-elect Hawkins,

Please find enclosed herewith our check in the amount of $500 to assist in the retirement of your campaign debt.

We are pleased to be able to assist in this endeavor. If we can be of further assistance, please contact me personally.

Very truly yours,

John D. Romanin,
Treasurer

JDR:cjp
Encl.

PAID FOR BY THE NATIONAL REPUBLICAN CANDIDATES COMMITTEE.
NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATES COMMITTEE

83040435450

NATIONAL REPUBLICAN CANDIDATES COMMITTEE
PH. 998-5270
1000 NORTH HAMPTON STREET
ALEXANDRIA, VIRGINIA 22311

December 23, 19 80

68-105
560

THE SUM 500 DOLS 00 CTS

Pay _____ DOLLARS $ 500.00

TO THE ORDER OF HAWKINS FOR SENATE COMMITTEE

NOT NEGOTIABLE

⑆056001066⑆ ⑈050 J.D. ROMANIN TREAS.

NATIONAL REPUBLICAN CANDIDATES COMMITTEE

DELUXE - FORM WVD-3 V-2

| DATE | DESCRIPTION | AMOUNT |
|---|---|---|
| | CONTRIBUTION | |

8 3 0 4 0 4 3 5 4 5 1

PH. [illegible]
1000 NORTH BEAUREGARD STREET, SUITE 12
ALEXANDRIA, [illegible]INIA 22311

[illegible]

December 23, 19 80

68-106
560

THE SU[illegible] 500 DOLS 00 CTS

PAY _____ DOLLARS $ 500.00

TO THE ORDER OF

HAWKINS FOR SENATE COMMITTEE

⑆056001066⑆ ⑈050[illegible]9⑈ J.D. ROMANIN TREAS.

NATIONAL REPUBLICAN CANDIDATES COMMITTEE

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY NO RECEIPT DESIRED

DELUXE - FORM WVC-3 V-2

| DATE | DESCRIPTION | AMOUNT |
|---|---|---|
| | CONTRIBUTION | |

83040435452

National Republican
Candidates' Committee

1900 N. BEAUREGARD STREET • ALEXANDRIA, VA. 22311

December 29, 1980

Congressman-elect Bill McCollom
P. O. Box 732
Altamonte Springs, Florida 32701

Dear Congressman-elect McCollom,

Please find enclosed herewith our check in the amount of $500 to assist in the retirement of your campaign debt.

We are pleased to be able to assist in this endeavor. If we can be of further assistance, please contact me personally.

Very truly yours,

John D. Romanin,
Treasurer

JDR:cjp
Encl.

8304043543

PAID FOR BY THE NATIONAL REPUBLICAN CANDIDATES COMMITTEE.
NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATES COMMITTEE

NATIONAL REPUBLICAN CANDIDATES COMMITTEE

PH. 998-5278
1900 NORTH BEAUREGARD STREET, SUITE 12
ALEXANDRIA, VIRGINIA 22311

DECEMBER 29, 1980

68-106
560

THE SUM 500 DOLS 00 CTS

PAY _____ DOLLARS $ 500.00

TO THE ORDER OF MC COLLOM FOR CONGRESS COMMITTEE

⑆056001066⑆ ⑈050⑈381⑈9⑈ J.D. ROMANIN TREAS.

NATIONAL REPUBLICAN CANDIDATES COMMITTEE

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY NO RECEIPT DESIRED

DELUXE - FORM WVC-3 V-2

| DATE | DESCRIPTION | AMOUNT |
|---|---|---|
| | CONTRIBUTION | |

930435454

8 3 0 4 0 4 3 5 4 5 5

NATIONAL REPUBLICAN CANDIDATES COMMITTEE
PH. 703-5278
1000 NORTH GLEBE ROAD, ARLINGTON PLAZA
ALEXANDRIA, VIRGINIA 22201

DECEMBER 29, 19 80

68-102
510

THE SUM 500 DOLS 00 CTS

PAY _____ DOLLARS $ 500.00

TO THE ORDER OF

MC COLLOM FOR CONGRESS COMMITTEE

NOT NEGOTIABLE

⑆056001066⑆ ⑈050⑈38 ⑆⑈9⑈ J.D. ROMANIN TREAS.

NATIONAL REPUBLICAN
CANDIDATES COMMITTEE

DELUXE - FORM WVD-2 V-8

CONTRIBUTION

National Republican
Candidates' Committee

1900 N. BEAUREGARD STREET • ALEXANDRIA, VA. 22311

December 29, 1980

Congressman-elect John LeBoutillier
Box 230
Old Westbury, New York 11568

Dear Congressman-elect LeBoutillier,

Please find enclosed herewith our check in the amount of $500 to assist in the retirement of your campaign debt.

We are pleased to be able to assist in this endeavor. If we can be of further assistance, please contact me personally.

Very truly yours,

John D. Romanin,
Treasurer

JDR:cjp
Encl.

PAID FOR BY THE NATIONAL REPUBLICAN CANDIDATES COMMITTEE.
NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE

83040435456

PH. 998-5275
1900 NORTH BEAUREGARD STREET, SUITE 12
ALEXANDRIA, VIRGINIA 22311

December 29, 1980

66-108
560

THE SU-500 DOLS 00 CTS

PAY _____ DOLLARS $ 500.00

TO THE ORDER OF LEBOUTILLIER FOR CONGRESS COMMITTEE

J.D. ROMANIN TREAS.

:056001066: ⑈050⑈38 6⑈⑈⑈

NATIONAL REPUBLICAN CANDIDATES COMMITTEE

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED

DELUXE - FORM WVC-3 V-2

| DATE | DESCRIPTION | AMOUNT |
|---|---|---|
| | CONTRIBUTION | |

83004354357

8 3 0 4 0 4 3 5 4 5 8

"0"

NATIONAL REPUBLICAN CANDIDATES COMMITTEE
TEL 998-5279
1000 NORTH RAMSDELL STREET, SUITE 12
ALEXANDRIA, VIRGINIA 22311

December 29, 10 80

69-105
500

THE SUM 500 DOLS 00 CTS

PAY DOLLARS $ 500.00

TO THE ORDER OF BOUTILLIER FOR CONGRESS COMMITTEE

NOT NEGOTIABLE

⑆056001066⑆ ⑈050⑈381⑈ J.D. ROMANIN TREAS.

NATIONAL REPUBLICAN
CANDIDATES COMMITTEE

DELUXE - FORM WVB-3 V-2

| DATE | PARTICULARS | AMOUNT |
|---|---|---|
| | CONTRIBUTION | |

National Republican
Candidates' Committee

1900 N. BEAUREGARD STREET • ALEXANDRIA, VA. 22311

December 29, 1980

Congressman-elect Greg Carman
375 Fulton Street
Farmingdale, New York 11735

Dear Congressman-elect Carman,

Please find enclosed herewith our check in the amount of $500 to assist in the retirement of your campaign debt.

We are pleased to be able to assist in this endeavor. If we can be of further assistance, please contact me personally.

Very truly yours,

John D. Romanin,
Treasurer

JDR:cjp
Encl.

PAID FOR BY THE NATIONAL REPUBLICAN CANDIDATES COMMITTEE.
NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATES COMMITTEE

33040435453

NATIONAL REPUBLICAN CANDIDATES COMMITTEE

PH. 998-3278
1900 NORTH BEAUREGARD STREET, SUITE 12
ALEXANDRIA, VIRGINIA 22311

December 29 19 80 68-108/560

THE SUM 500 DOLS 00 CTS

PAY DOLLARS $ 500.00

TO THE ORDER OF CARMAN FOR CONGRESS COMMITTEE

⑆056001066⑆ ⑈050 381 4⑈ J. D. ROMANIN TREAS.

NATIONAL REPUBLICAN CANDIDATES COMMITTEE

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY NO RECEIPT DESIRED

DELUXE - FORM WVO-3 V-2

| DATE | DESCRIPTION | AMOUNT |
|---|---|---|
| | CONTRIBUTION | |

830410435460

8 3 0 4 0 4 3 5 4 6 1

NATIONAL REPUBLICAN CANDIDATES COMMITTEE
PH. 998-5278
1000 NORTH [illegible] STREET, SUITE 12
ALEXANDRIA, VIRGINIA [illegible]

December 29 10 80

68-106
550

THE SUM 500 DOLS 00 CTS

PAY _____ DOLLARS $ 500.00

TO THE ORDER OF CARMAN FOR CONGRESS COMMITTEE

NOT NEGOTIABLE

⑆056001066⑆ ⑈050⑈381 J. D. ROMANIN TREAS.

NATIONAL REPUBLICAN
CANDIDATES COMMITTEE

DELUXE - FORM WVD-3 V-2

| DESCRIPTION | AMOUNT |
|---|---|
| CONTRIBUTION | |

National Republican
Candidates' Committee

1410 N. BEAUREGARD STREET • ALEXANDRIA, VA. 22311

December 29, 1980

Congressman-elect Duncan Hunter
454 A Street
Coronado, California 92118

Dear Congressman-elect Hunter,

Please find enclosed herewith our check in the amount of $500 to assist in the retirement of your campaign debt.

We are pleased to be able to assist in this endeavor. If we can be of further assistance, please contact me personally.

Very truly yours,

John D. Romanin,
Treasurer

JDR:cjp
Encl.

830043546

PAID FOR BY THE NATIONAL REPUBLICAN CANDIDATES COMMITTEE.
NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATES COMMITTEE

NATIONAL REPUBLICAN CANDIDATES COMMITTEE

PH. 998-3278
1800 NORTH BEAUR[illegible]RD STREET, SUITE 12
ALEXANDRIA, [illegible]RGINIA 22311

December 29, 19 80

68-106
560

PAY THE SUM 500 DOLS 00 CTS DOLLARS $ 500.00

TO THE ORDER OF HUNTER FOR CONGRESS COMMITTEE

⑆056001066⑆ ⑈050⑈386⑈9⑈ J.D. ROMANIN TREAS.

NATIONAL REPUBLICAN CANDIDATES COMMITTEE

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY NO RECEIPT DESIRED.

DELUXE - FORM WVC-3 V-2

| DATE | DESCRIPTION | AMOUNT |
|---|---|---|
| | CONTRIBUTION | |

830404354 63

NATIONAL REPUBLICAN CANDIDATES COMMITTEE
P.O. BOX 1979
1900 N. FT. MYER DRIVE
ARLINGTON, VIRGINIA 22211

December 29, 19 80

THE SUM 500 DOLS 00 CTS

PAY DOLLARS $ 500.00

TO THE ORDER OF HUNTER FOR CONGRESS COMMITTEE

NOT NEGOTIABLE

⑆056001066⑆ ⑈050 J.D. ROMANN TREAS.

NATIONAL REPUBLICAN CANDIDATES COMMITTEE

DELUXE - FORM WVD-3 V-3

CONTRIBUTION

830403546

National Republican
Candidates' Committee

1900 N. BEAUREGARD STREET • ALEXANDRIA, VA. 22311

December 29, 1980

Congressman-elect Guy Molinari
1720 Hylan
Staten Island, New York 10304

Dear Congressman-elect Molinari,

Please find enclosed herewith our check in the amount of $500 to assist in the retirement of your campaign debt.

We are pleased to be able to assist in this endeavor. If we can be of further assistance, please contact me personally.

Very truly yours,

John D. Romanin,
Treasurer

JDR:cjp
Encl.

23040435465

PAID FOR BY THE NATIONAL REPUBLICAN CANDIDATES COMMITTEE,
NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATES COMMITTEE

PH. 998-3279
1900 NORTH BEAUREGARD STREET, SUITE 12
ALEXANDRIA, VIRGINIA 22311

December 29, 1980

68-106
560

PAY THE SUM 500 DOLS 00 CTS DOLLARS $ 500.00

TO THE ORDER OF MOLINARI FOR CONGRESS COMMITTEE

⑆056001066⑆ ⑈050⑈381⑈4⑈ J.D. ROMANIN TREAS.

NATIONAL REPUBLICAN CANDIDATES COMMITTEE

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS SEARCHED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED

DELUXE - FORM WVC-3 V-2

| DATE | DESCRIPTION | AMOUNT |
|---|---|---|
| | CONTRIBUTION | |

3304013546

NATIONAL REPUBLICAN CANDIDATES COMMITTEE
PH. 703-5278
1900 NORTH BEAUREGARD STREET, SUITE 10
ALEXANDRIA, VIRGINIA 22311

December 29, 1980

63-108
500

THE SUM 500 DOLS 00 CTS

PAY _____ DOLLARS $ 500.00

TO THE ORDER OF

MOLINARI FOR CONGRESS COMMITTEE

NOT NEGOTIABLE

⑆056001066⑆ ⑈050⑈30 1⑈9⑈ J.D. ROMANIN TREAS.

NATIONAL REPUBLICAN
CANDIDATES COMMITTEE

DELUXE - FORM WVG-3 V-2

| | | |
|---|---|---|
| | CONTRIBUTION | |

830404357

National Republican
Candidates' Committee

1900 N. BEAUREGARD STREET • ALEXANDRIA, VA. 22311

December 29, 1980

Senator-elect Steve Symms
Symms for Senate Committee
P. O. Box 471
Boise, Idaho 83701

Dear Senator-elect Symms,

Please find enclosed herewith our check in the amount of $500 to assist in the retirement of your campaign debt.

We are pleased to be able to assist in this endeavor. If we can be of further assistance, please contact me personally.

Very truly yours,

John D. Romanin,
Treasurer

JDR:cjp
Encl.

PAID FOR BY THE NATIONAL REPUBLICAN CANDIDATES COMMITTEE.
NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATES COMMITTEE

83040435468

NATIONAL REPUBLICAN CANDIDATES COMMITTEE

PH. 998-5278

1900 NORTH BEAUREGARD STREET, SUITE 12

ALEXANDRIA, VIRGINIA 22311

Riggs National Bank & Trust Co.

Washington, D.C.

68-108
560

December 23, 1980

THE SUM 500 DOLS 00 CTS

PAY _____ DOLLARS $ 500.00

TO THE ORDER OF SYMMS FOR SENATE COMMITTEE

⑆056001066⑆ ⑈050038 1⑈ J.D. ROMANIN TREAS.

NATIONAL REPUBLICAN CANDIDATES COMMITTEE

DETACH AND RETAIN THIS STATEMENT

THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY NO RECEIPT DESIRED

DELUXE - FORM WVC-3 V-2

| DATE | DESCRIPTION | AMOUNT |
|---|---|---|
| | CONTRIBUTION | |

30040435463

NATIONAL REPUBLICAN CANDIDATES COMMITTEE
PH. 998-5278
1000 [illegible] STAUBER AND SIBLEY, SUITE [illegible]
ALEXANDRIA, VIRGINIA 22314

"0"

December 23, 19 80

28-105
5.47

PAY THE SUM 500 DOLS 00 CTS DOLLARS $ 500.00

TO THE ORDER OF SYMMS FOR SENATE COMMITTEE

NOT NEGOTIABLE

⑆056001066⑆ ⑈050⑈381 J.D. ROMANIN TREAS.

NATIONAL REPUBLICAN
CANDIDATES COMMITTEE

DELUXE - FORM WVC-3 V-2

CONTRIBUTION

8 3 0 4 0 4 3 5 4 7 0

National Republican
Candidates' Committee

1900 N. BEAUREGARD STREET • ALEXANDRIA, VA. 22311

December 29, 1980

Senator-elect Chuck Grassley
P. O. Box 1000
Des Moines, Iowa 50306

Dear Senator-elect Grassley,

Please find enclosed herewith our check in the amount of $500 to assist in the retirement of your campaign debt.

We are pleased to be able to assist in this endeavor. If we can be of further assistance, please contact me personally.

Very truly yours,

John D. Romanin,
Treasurer

JDR:cjp
Encl.

8 3 0 4 0 4 3 5 4 7 1

PAID FOR BY THE NATIONAL REPUBLICAN CANDIDATES COMMITTEE;
NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATES COMMITTEE

NATIONAL REPUBLICAN CANDIDATES COMMITTEE
PH. 998-5979
1900 NORTH BEAUREGARD STREET, SUITE 15
ALEXANDRIA, VIRGINIA 22311

'0'

December 23, 19 80

CB-105
500

THE SUM 500 DOLS 00 CTS

PAY _____ DOLLARS $ 500.00

TO THE ORDER OF GRASSLEY FOR SENATE COMMITTEE

NOT NEGOTIABLE

⑆056001066⑆ ⑈050⑈ J.D. ROMANIN TREAS.

NATIONAL REPUBLICAN
CANDIDATES COMMITTEE

DELUXE - FORM WVC-3 V-2

| | | |
|---|---|---|
| | CONTRIBUTION | |

830403547

PH. 683-3278
1900 NORTH BEAUREGARD STREET, SUITE 12
ALEXANDRIA, VIRGINIA 22311

December 23, 1980

68-106
560

THE SUM 500 DOLS 00 CTS

PAY _____ DOLLARS $ 500.00

TO THE ORDER OF GRASSLEY FOR SENATE COMMITTEE

⑆056001066⑆ ⑈050⑈38 J.D. ROMANIN TREAS.

NATIONAL REPUBLICAN CANDIDATES COMMITTEE

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED

DELUXE - FORM WVC-3 V-2

| DATE | DESCRIPTION | AMOUNT |
|---|---|---|
| | CONTRIBUTION | |

3304043547

National Republican
Candidates' Committee

1400 N. BEAUREGARD STREET • ALEXANDRIA, VA. 22311

December 29, 1980

Senator-elect Mack Mattingly
P. O. Box 1980
Atlanta, Georgia 30301

Dear Senator-elect Mattingly,

Please find enclosed herewith our check in the amount of $500 to assist in the retirement of your campaign debt.

We are pleased to be able to assist in this endeavor. If we can be of further assistance, please contact me personally.

Very truly yours,

John D. Romanin,
Treasurer

JDR:cjp
Encl.

8 3 0 4 0 4 3 5 4 7

PAID FOR BY THE NATIONAL REPUBLICAN CANDIDATES COMMITTEE.
NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATES COMMITTEE

NATIONAL REPUBLICAN CANDIDATES COMMITTEE

PH. 998-5278

1900 NORTH BEAUREGARD STREET, SUITE 12

ALEXANDRIA, VIRGINIA 22311

102

December 23, 19 80

68-106
560

THE SUM 500 DOLS 00 CTS

PAY _____ DOLLARS $ 500.00

TO THE ORDER OF

MATTINGLY FOR SENATE COMMITTEE

NOT NEGOTIABLE

⑆056001066⑆ ⑈050⑈38 J.D. ROMANIN TREAS.

NATIONAL REPUBLICAN CANDIDATES COMMITTEE

DELUXE - FORM WVD-3 V-2

| DATE | DESCRIPTION | AMOUNT |
|---|---|---|
| | CONTRIBUTION | |

3 3 0 4 0 4 3 5 4 7 3

PH. 998-5278
1000 NORTH BEAUREGARD STREET, SUITE 12
ALEXANDRIA, VIRGINIA 22311

December 23, 1980

68-106
560

THE SUM 500 DOLS 00 CTS

PAY _____ DOLLARS $ 500.00

TO THE ORDER OF MATTINGLY FOR SENATE COMMITTEE

⑆056001066⑆ ⑈050⑈38 J.D. ROMANIN TREAS.

NATIONAL REPUBLICAN CANDIDATES COMMITTEE

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY NO RECEIPT DESIRED

DELUXE - FORM WVC-3 V-2

| DATE | DESCRIPTION | AMOUNT |
|---|---|---|
| | CONTRIBUTION | |

80041354476

(6)

# 1980 REPUBLICAN SENATORIAL WINNERS

| | | | |
|---|---|---|---|
| AL | Jerry Denton<br>Denton for Senate<br>3443 Armour Dr.<br>Box 1980<br>Mobile, Alabama 36601<br>(rep. pick-up) | Admiral Denton<br>Roy Adams - Charge Coordinating<br>Cable doesn't work now<br>DAVE KITCHEY / MIKE WERMUTH<br>EXECUTIVE ASSISTANT | (205)479-6562 |
| AK | Frank Murkowski<br>Murkowski for U. S. Senate<br>~~524 W. 6th Ave.~~<br>Anchorage, Alaska 99501<br>(rep. pick-up) | ~~BAB MCCONKEY~~<br>437 E. ST Suite #30 | (907)276-3335 |
| AZ | Barry Goldwater<br>Goldwater for Senate Committee<br>Box 39515<br>Phoenix, Arizona 85069<br>(incumbent) | STEPHEN C SHADEGG<br>STEPHEN SHADEGG ~~AZ~~ AZ<br>377 N. 3rd AVE<br>PHOENIX AZ 85005 | (602)258-8169 |
| FL | Paula Hawkins<br>Paula Hawkins for Senate<br>Box 12637<br>Tallahassee, Florida 32308<br>(rep. pickup) | DON WEIDNER<br>TREASURER | (904)224-3207/5748 |
| GA | Mack Mattingly<br>Friends of Mack Mattingly<br>Box 1980<br>Atlanta , Ga. 30301<br>(rep. pick-up) | MARY EGBERT<br>CAMPAIGN MANAGER | (404)231-5715 |
| ID | Steve Symms<br>Symms for Senate<br>Box 471<br>Boise, Idaho 83701<br>(rep. pick-up) | PHIL REBERGER<br>CAMPAIGN MANAGER | (208)344-1776 |
| IN | Dan Quayle<br>Quayle for Senate<br>Box 216<br>Indianapolis, Indiana 46206<br>(rep. pick-up) | MARK MILES<br>CAMPAIGN MANAGER<br>DAVID CULP & CO. | (317)636-8080 |
| IA | Charles Grassley<br>Grassley for Senate<br>Box 1000<br>Des Moines, Iowa 50309<br>(rep. pick-up) | TREAS - JOHN HENSS<br>CAMPAIGN MGR. JOHN MAXWELL | (515)243-1980 |
| KN | Robert Dole<br>Dole for Senate<br>1001 Kansas Ave.<br>Topeka, Kansas 66612<br>(incumbent) | CAM LARRY DUNN<br>TREAS - CHARLES CLINKENBEARD | (913)233-1203 |

no [illegible] 11/11/80

Charles Mathias
Marylanders for Mathias
9300 Georgia Ave.
MD. Silver Spring, Maryland 20910
(301) 589-0383
(Incumbent)

Paul Laxalt
Laxalt for Senate
Box 2207
NV. Carson City, Nevada 89701
(702)883-7711
(Incumbent)

JERRY DONDERO C Mgr
OLLIE KINNEY TREAS

Warren Rudman
Warren Rudman for U. S. Senate
Box 2016
Concord, NH 03301
NH (603)225-5384
(rep. pick-up) Dear Senator-elect Rudman

MR. ALLAN WALKER C Mgr Campaign Manager
Mr. William Phillips TREAS

Alfonse D'Amato
Friends of Al D'Amato
18 E. Sunrise Hwy., Suite 301
NY Freeport, N. Y. 11520
(212)582-1772 Dear Senator-elect D'Amato

MR. "CARL OTTOSEN C Mgr
CARL Van Ness TREAS

John East
John East for Senate Committee
Box 26493
NC Raleigh, N.C. 27611 Dear Senator-elect
(919)782-7331
(rep. pick-up)

Mark Andrews
Andrews for Senate Committee
Box 1773
ND Fargo, ND 58107
(701)232-8030

ED DOHERTY C Mgr
Robert C. RUST TREAS

Don Nickles
Nickles for Senate
Box 1549
OK Ponca City, Oklahoma 74601
(405)762-1628

Robert Packwood
Reelect Bob Packwood Committee
Box 619
OR Portland, Oregon 97207
(503)249-0411
(incumbent)

Dear Senator

Arlen Specter
Specter for Senate

Suite 1402
Western Savings Bank Building
PA Broad & Chestnut St. (215)546-9750
Philadelphia, Pa. 19107

SD Jim Abdnor
Friends for Jim Abdnor
Box 5004
Sioux Falls, South Dakota 57117
(605)331-2000
(rep. pick-up)

Dear Congressman

UT Jake Garn
Jake Garn Campaign Committee
Box 11998
Salt Lake City, Utah 84147
(801)532-2080

Dear Senator

Michael Leavitt C. Mgr.
Darrel Newman Treas.

WI Robert Kasten
Kasten for U. S. Senate
8665 N. Port Washington Rd.
Milwaukee, Wisconsin 53217
(414)351-6615
(rep. pick-up)

Dennis Hewell Mgr.
Dear Cong. Mike Grebe C. Dir

WA Slade Gorton
Gorton for Senate
500 Wall Street
Seattle, Washington 98121
(206)447-9720
(rep. pick-up)

Helen Rasmussen Mgr.
Carl Williams

Sen.-elect.

Speaker-Elect Paula Hawkins

8304043547

Senate Select Intelligence
C/o
Mary Beth Blumberg
Dirksen SOB 1327
Washington DC 20510
Dear Mary Beth
Sergeant Committee 224-2351
Per our
RE: Telephone Conversation of 12/18/80
RCB

8304043543C

NATIONAL REPUBLICANS CANDIDATES COMMITTEE
PHONE: (703) 998-0334
1900 N. BEAUREGARD STREET, SUITE 12
ALEXANDRIA, VIRGINIA 22311

101

December 1, 19 80 68-107/580 13

PAY TO THE ORDER OF MARK WINKLER MANAGEMENT COMPANY $ 275.00

TWO HUNDRED SEVENTY FIVE DOLLARS & NO/100 DOLLARS

United Virginia Bank
Northern Region

NON-NEGOTIABLE

⑆056001079⑆ 072-[illegible]-984⑈

| DATE | DESCRIPTION | AMOUNT |
|---|---|---|
| | PAYMENT FOR DECEMBER 1980 Rent | |

V2-1

NATIONAL REPUBLICANS CANDIDATES COMMITTEE

NATIONAL REPUBLICANS CANDIDATES COMMITTEE
PHONE: (703) 998-0334
1900 N. BEAUREGARD STREET, SUITE 12
ALEXANDRIA, VIRGINIA 22311

102

December 1, 19 30 $\frac{68\text{-}107}{560}$ 13

PAY TO THE ORDER OF MEDIAMERICA $ 3,500.00

THREE THOUSAND FIVE HUNDRED DOLLARS & NO/100 DOLLARS

United Virginia Bank
Northern Region

NON-NEGOTIABLE

⑆056001079⑆ 072

| DATE | DESCRIPTION | AMOUNT |
|---|---|---|
| | payment on account -----invoice #758 | |

V2-1

NATIONAL REPUBLICANS CANDIDATES COMMITTEE

8 3 0 4 0 4 3 5 4 0 2

NATIONAL REPUBLICANS CANDIDATES COMMITTEE
PHONE: (703) 998-0334
1900 N. BEAUREGARD STREET, SUITE 12
ALEXANDRIA, VIRGINIA 22311

103

December 1, 19 80 $\frac{68\text{-}107}{560}$ 13

PAY TO THE ORDER OF MEDIAMERICA $ 1,000.00

ONE THOUSAND DOLLARS & NO/100 DOLLARS

United Virginia Bank
Northern Region

NON-NEGOTIABLE

⑆056001079⑆ 072 [illegible] 981⑈

| DATE | DESCRIPTION | AMOUNT |
|---|---|---|
| | PAYMENT FOR INVOICE #772 November Expenses '80 | |

V2-1

NATIONAL REPUBLICANS CANDIDATES COMMITTEE

830404354 3

NATIONAL REPUBLICANS CANDIDATES COMMITTEE
PHONE: (703) 998-0334
1900 N. BEAUREGARD STREET, SUITE 12
ALEXANDRIA, VIRGINIA 22311

104

DECEMBER 1, 19 80 68-107/580 13

PAY TO THE ORDER OF MEDIAMERICA $ 1,064.50

ONE THOUSAND SIXTY FOUR DOLLARS & 50/100 DOLLARS

United Virginia Bank
Northern Region

NON-NEGOTIABLE

⑆056001079⑆ 0

| DATE | DESCRIPTION | AMOUNT |
|---|---|---|
| | PAYMENT FOR INVOICE #776---December '30 EXPENSES | |

V2-1

NATIONAL REPUBLICANS CANDIDATES COMMITTEE

⑈ 3 0 4 0 4 3 5 4 8 4 ⑈

NATIONAL REPUBLICAN CANDIDATES COMMITTEE
PH. 703-5278
1900 NORTH BEAUREGARD STREET, SUITE 12
ALEXANDRIA, VIRGINIA 22311

January 10, 19 81

63-106
500

PAY TWO THOUSAND DOLLARS & NO/100 DOLLARS $ 2,000.00

TO THE ORDER OF MEDIAMERICA

:0560010660: ⑈050⑈30

NATIONAL REPUBLICAN
CANDIDATES COMMITTEE

DELUXE - FORM WVD-3 V-2

PAYMENT ON ACCOUNT --Urgent Grams--Drop Date 12/5/80

8 3 0 4 0 4 3 5 4 9 E

STEVE SYMMS
IDAHO

# United States Senate

WASHINGTON, D.C. 20510

March 30,1981

Mr.Richard Geske
National Candidates Committee
1900 N. Beauregard Street
Alexandria, Virginia 22311

Dear Mr. Geske:

This is in response to your request for clarification as to the use of my name in your Committee's December 5th fundraising solicitation.

As you aware, I was not asked if my name could be used in this solicitation,and therefore, did not authorize such use in advance.

Please be informed that although I was not aware of the use of my name in your letter, I personally have no objection at this time. Had your Committee requested the use of my name I would have seriously considered such a request and most likely would have engaged in the fundraising effort.

I appreciated the contribution received by my own Campaign Committee and look forward to your continuing support in the future.

Best regards.

Sincerely,

Steve Symms

Steve Symms
United States Senator

SS:att

3 3 0 4 0 4 3 5 4 3 6

URGENTGRAM SERVICE C
ALEXANDRIA, VA. 22

4-012763J2682001 10/25/80 SCI IPNNACC CSP FSCFI
1 703998567 UGM TDMA ALEXANDRIA VA 10-25 0800P EST

Mrs. Carol Reed
Americans For Change
218 North Lee St., #218
Alexandria, Virginia 22314

THE FOLLOWING MESSAGE IS TRANSMITTED FROM:

703998567 UGM ALEXANDRIA VA 26 10-25 0800P EST
ZIP

JOHN D. ROMANIN
NATIONAL FINANCE DIRECTOR
NATIONAL REPUBLICAN CAND. COMM.
1900 NORTH BEAUREGARD ST
ALEXANDRIA VA 22311

NEED YOUR HELP IMMEDIATELY! LEAD IN POLLS IS EVAPORATING. CARTER VICIOUSLY ATTACKING REAGAN. GOOD CONSERVATIVES REAGAN NEEDS IN SENATE AND HOUSE OF REPRESENTATIVES SUFFERING FROM BACKLASH OF CARTER ATTACKS. BIG MEDIA AND TELEVISION NETWORKS STEPPING UP ANTI-REAGAN PROPAGANDA. POWERFUL BIG LABOR UNIONS PUMPING MILLIONS INTO LIBERAL CAMPAIGNS DURING FINAL DAYS OF ELECTION. MUST PULL OUT ALL STOPS IN REMAINING FINAL HOURS TO PREVENT DEFEAT. PLEASE SEND MAXIMUM EMERGENCY CONTRIBUTION RIGHT AWAY. NO CONTRIBUTION IS TOO SMALL. CAN'T LET CARTER AND BIG LABOR BOSSES STEAL THIS ELECTION AWAY FROM CONSERVATIVES. PLEASE SEND CHECK NOW FOR ELEVENTH HOUR VICTORY EFFORTS. LAST PUSH TO WIN IN FULL SWING. NO SECOND CHANCE AT THIS LATE DATE. ITS WIN OR LOSE NOW. PLEASE HELP. PLEASE HELP. MAKE YOUR CHECK PAYABLE TO: NATIONAL REPUBLICAN CANDIDATE COMMITTEE. PLEASE SEND TODAY.

0800 EST

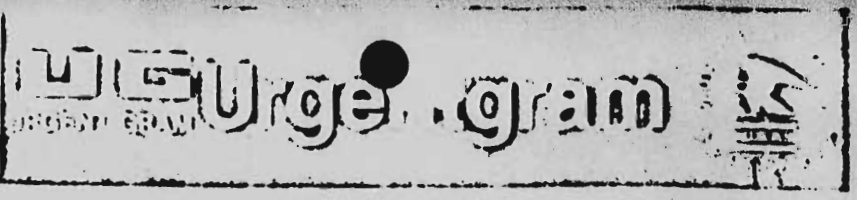
UGMCOMP UGM

***** REFOLD ENTIRE URGENTGRAM AND RETURN
WITH CHECK ENCLOSED IN SPECIALLY MARKED ENVELOPE.

5824(M1-8/80)

TO REPLY BY URGENTGRAM, CALL (703) 998-0338

NATIONAL URGENTGRAM SERVICE
CENTER
1900 N. BEAUREGARD ST. #12
ALEXANDRIA, VA. 22311



##### 4-0]2453 J 234]]2 12/5/80 SIC CPS FSCFI
1 7039980334 UGM TDMA ALEXANDRIA VA 12/5 0900 EST

Mr. ronald Davis
3129 S. 14th St.
Arlington, VA 22204

THE FOLLOWING MESSAGE IS TRANSMITTED FROM: NATIONAL REPUBLICAN CANDIDATE'S COMMITTEE..... JOHN D. ROMANIN.....NATIONAL FINANCE CHAIRMAN..... 0900 EST 12/5

ON BEHALF OF PRESIDENT-ELECT RONALD REAGAN AND MYSELF, THANK YOU! ..... Mr. Davis, MAKE NO MISTAKE ABOUT IT..... RONALD REAGAN IS PRESIDENT BECAUSE OF YOUR BELIEF IN THE MAN AND THE PRINCIPLES HE REPRESENTS AND BECAUSE OF YOUR ENDURING SUPPORT.....I ALSO WANT TO EXTEND MY PERSONAL GRATITUDE TO YOU FOR HELPING ELECT A REPUBLICAN MAJORITY TO THE U. S. SENATE..... IT'S THE FIRST TIME IN OVER 26 YEARS REPUBLICANS HAVE CONTROLLED THE "UPPER CHAMBER"..... THIS VICTORY IS EVEN MORE GRATIFYING BECAUSE MANY GOOD CONSERVATIVES LIKE SENATORS THURMOND, HATCH AND GARN WILL BECOME CHAIRMEN OF VERY POWERFUL COMMITTEES..... ADDITIONALLY, OUTSTANDING CANDIDATES LIKE STEVE SYMMS FROM IDAHO AND PAULA HAWKINS FROM FLORIDA WILL GREATLY INCREASE OUR STRENGTH IN THE SENATE..... NONE OF THESE GAINS COULD HAVE BEEN POSSIBLE WITHOUT YOUR PERSONAL COMMITMENT..... BUT NOW I MUST TURN MY ATTENTION TO HELPING THESE NEWLY ELECTED "REAGAN" SENATORS AND CONGRESSMEN..... COMBINED, THEY HAVE CAMPAIGN DEBTS TOTALING $1.2 MILLION...THEY REALLY DESERVE HELP...MANY CAMPAIGNED 16-18 HOURS A DAY FOR MONTHS BEFORE THE ELECTION SO AS NOT TO LET US DOWN..... AND IN THE RACES THAT WERE TOO CLOSE TO CALL, I URGED EACH CANDIDATE TO SPEND A MINIMUM OF $50,000 ON LAST MINUTE TV AND RADIO ADVERTISEMENTS WITH MY PROMISE TO HELP THEM AFTER THE ELECTIONS..... I KNEW THAT IN A CLOSE RACE, HEAVY TV AND RADIO SATURATION WOULD PUSH THEM OVER THE TOP..... MY STRATEGY WORKED BUT CAMPAIGNS HAD TO GO INTO DEBT..... WITH MASSIVE DEBTS NOW HANGING OVER THEIR HEADS THEY CAN'T CONCENTRATE ON THEIR WORK..... MORE IMPORTANTLY, NEW CONSERVATIVES WITH LARGE DEBTS BECOME A PRIME TARGET OF WEALTHY LIBERALS AND POWERFUL LABOR UNIONS WHO HAVE SWORN "TO GET EVEN"..... PLEASE HELP ME KEEP MY PROMISE TO HELP THESE GOOD CONSERVATIVES PAY OFF THEIR DEBTS..... Mr. Davis, WON'T YOU SEND THE NAT. REP. CANDIDATE'S COMM. $50 OR PERHAPS $100 OR MORE SO THAT I DON'T HAVE TO BREAK MY PROMISES TO THEM..... I APOLOGIZE FOR NOT CONSULTING WITH YOU BEFORE ADVISING OUR CANDIDATES TO GO INTO DEBT IN ORDER TO WIN, BUT THERE WASN'T ANY TIME TO CONTACT YOU IN THE REMAINING DAYS OF THE ELECTION.... I HOPE YOU'LL FORGIVE ME AND HELP THE COMMITTEE NOW BY SENDING AS GENEROUS A CONTRIBUTION AS POSSIBLE..... GOD BLESS.....

0900 P EST JOHN. D. ROMANIN..... NATIONAL FINANCE CHAIRMAN

****** PLEASE REFOLD ENTIRE URGENTGRAM AND RETURN WITH CHECK IN ENCLOSED ENVELOPE - MAKE CHECK PAYABLE TO NATIONAL REPUBLICAN CANDIDATE'S COMMITTEE.******

Urgentgram

THE MESSAGE ENCLOSED WAS TRANSMITTED TO THE URGENTGRAM CENTER AND MAI

A POST OFFICE BOX NEAR YOU

8 3 0 4 0 4 3 5 4 8 5

8 3 0 4 0 4 3 5 4 9 0

National Republican Candidate Committee
c/o National Urgentgram Communication Center
1900 North Beauregard Street
#12
Alexandria, Virginia 22314

Attn: National Finance Director

UNITED STATES POSTAL SERVICE
475 L'Enfant Plaza, SW
Washington, DC 20260

245-5023

DEC 1 2 1980

Media America
1900 N. Beauregard St., #12
Alexandria, Virginia 22311

Dear Sir or Madam:

It has come to our attention that your "Urgentgram" mailing envelopes include an altered eagle logotype, obviously copied from the U.S. Postal Service seal and emblem. You are advised that affixing such altered seal to paper is a criminal violation carrying a fine of up to $5,000, imprisonment for up to 5 years, or both. 18 U.S.C. §506.

The Postal Service emblem, in addition to being the official seal of the Postal Service, is also its registered trademark and service mark, Registration No. 975,033. As I am sure you are aware, a trademark owner must take the actions necessary to assure that its marks are not misused.

Because of the seriousness with which we consider this matter, we must require the unequivocable written assurance that you will cease all use of the Postal Service emblem or any imitation thereof.

Sincerely,

T. Major

Theodore Major
Patent Counsel

83040435491

UNITED STATES POSTAL SERVICE
475 L'Enfant Plaza, SW
Washington, DC 20260

JAN 21 1981

Media America
1900 N. Beauregard St., #12
Alexandria, Virginia 22311

Dear Sir or Madam:

On December 12, 1980 we wrote to you asking that you cease the use of the altered eagle logotype which is the seal and emblem of the United States Postal Service and our registered trademark/service mark, Registration No. 975,033. You have not yet responded.

Since that time we have been informed of your continued, widespread violation of both the Criminal Code, Section 506 of Title 18 of the United States Code and of our property rights in the United States Postal Service emblem trademark, Registration No. 975,033.

You are hereby advised that if we do not have your unequivocable written assurance within 10 days of the date of this letter that you are ceasing all use of the Postal Service emblem, any imitation or alteration of the emblem, the Department of Justice will be provided with the necessary information to take immediate steps to enforce both the criminal and civil violations.

Respectfully,

T. Major

Theodore Major
Patent Counsel

3304043549

AMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 998-0334

January 23, 1981

Theodore Major
Patent Counsel
United States Postal Service
475 L'Enfant Plaza, S.W.
Washington, D.C. 20260

Dear Mr. Major:

As per my telephone conversation of this date and your correspondence dated December 12, 1980 and January 21, 1981, please be advised that you have my unequivocable assurance that MediAmerica has ceased using all envelopes in question.

In fact, upon receipt of your first letter dated December 12, 1980, I took immediate action to comply with your request by cancelling all pending orders. Additionally, I directed the supervisor in charge of our mailing center to immediately discontinue the use of any of these forms and envelopes that remained in stock.

On this same date however, it came to my attention that some remaining overage was inadvertently used. To prevent this error from re-occuring, I have taken the precaution of ordering this stock destroyed.

MediAmerica printed "Urgentgram" envelopes and forms for direct mail solicitations with the hope of better serving our clients by increasing their response rates. At no time was the design of the package thought to violate any ordinance, law, patent, trademark, or federal code, hence the modifications in the eagle emblem and the use of the word "Urgentgram".

Thank you, Mr. Major, for being so courteous and helpful, and please be assured that you have my complete and earnest cooperation in this matter.

Sincerely,

D. Richard Geske

RG/ckt

03040435492

SUBPOENA TO TESTIFY BEFORE GRAND JURY

US v. John Doe No. 402
Grand Jury #81-1

# United States District Court
FOR THE

EASTERN DISTRICT OF VIRGINIA - Alexandria

to Custodian of Records
National Republican Candidate's Committee
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311

You are hereby commanded to appear in the United States District Court for the Eastern District of Virginia at 200 S. Washington Street in the city of Alexandria on the 2nd day of March 1981 at 9:30o'clock A.M. to testify before the Grand Jury and bring with you[1] originals, or in lieu thereof, copies of any and all records relating to any business agreement or arrangement between the National Republican Candidate's Committee (NRCC) and MediAmerica, Inc., such records to include but not limited to the following:

1. Any contractual agreement or arrangement between NRCC and MediAmerica, Inc.

2. Any records submitted to NRCC by MediAmerica in support of any bill or statement of charges for services rendered by MediAmerica, Inc.

(See attached continuation)

This subpoena is issued on application of the United States.

Karen P. Tandy, AUSA
117 S. Washington Street
Alexandria, VA 22314
703-557-9100

W. FARLEY POWERS, JR.
Clerk.

Date February 10, 19 81.

By Ruth Wardman
Deputy Clerk.

[1]Strike the words "and bring with you" unless the subpoena is to require the production of documents or tangible things, in which case the documents and things should be designated in the blank space provided for that purpose.

## RETURN

Received this subpoena at on
and on at I served it on the
within named
by delivering a copy to and tendering[2] to the fee for one day's attendance and the mileage allowed by law.

Date _____, 19 _____.

_____.

By _____.

Service Fees
Travel _____ $
Services _____
Total _____ $

[2]Fees and mileage need not be tendered to the witness upon service of a subpoena issued in behalf of the United States or an officer or agency thereof [illegible] in behalf of a defendant who is financially unable to pay such costs (Rule 17(b), Federal Rules Criminal Procedure).

3. Any and all actual bills or statements of charges submitted to NRCC by MediAmerica, Inc., for services rendered

4. Any document submitted to the Federal Election Commission by the NRCC or by MediAmerica, Inc. on behalf of NRCC.

5. Any mailing list used to solicit responses or funds for use in connection with any person running for reelection to a Republican seat in the Congress of the United States (either Senate or House of Representatives)

6. Any correspondence, letter, memorandum, record of telephone calls, telegrams, urgentgrams, or other communication between NRCC and republican senatorial candidates Steve Symms (Idaho) and Paula Hawkins (Florida), or any representative of his or her election campaign, or any other person running for election or reelection to a Republican seat in the Congress of the United States (either the Senate or the House of Representatives)

7. Any checks, or other negotiable instruments, money orders, bank transfers, cashier checks, or any other document representing monies paid to republican senatorial candidates Steve Symms (Idaho) or Paula Hawkins (Florida) or any representative of his or her election campaign, or any other person running for a Republican seat in the Congress of the United States (either the Senate or the House of Representatives)

8. Any response received by NRCC as a result of a mass-mailing to solicit monies for use in connection with the election or reelection of any person running for a Republican seat in the Congress of the United States (either the Senate or the House of Representatives)

9. Any checks or other negotiable instruments, money orders, bank transfers, cashiers checks or any other document representing monies paid to MediAmerica, Inc. for any services rendered by MediAmerica, Inc.

Republican
National
Committee

Bill Brock
Chairman

January 13, 1981

The Honorable John W. McGarry
Chairman, Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

Dear Chairman McGarry:

We have recently learned of the existence of a committee known as the National Republican Candidates Committee. This committee filed its statement of organization with the Commission on June 30, 1980. Its statement of organization clearly reflects that the committee is not a party committee.

It has further come to our attention that, upon inquiry to the FEC as to the status of the National Republican Candidates Committee, the person making the inquiry is advised by the Commission that the National Republican Candidates Committee is a party committee. It is my understanding that this misinformation is given out because the National Republican Candidates Committee has been entered into your computer as a party committee in the normal course of your operation.

I ask that the Commission immediately correct this error as the National Republican Candidates Committee is not a committee of the Republican Party. To have the Commission represent it as such has resulted in confusion on the part of contributors which has resulted in a number of inquiries to the three national committees of the Republican Party. I further request that you make public, through a press release and/or your normal publications the fact that the National Republican Candidates Committee is not a party committee.

Your prompt and favorable consideration of this request will be greatly appreciated.

Very truly yours,

BILL BROCK

BB:ijd

cc: Charles N. Steel, Esq.
D. Richard Geske
John D. Romanin

3 3 0 4 0 1 3 5 4 9 6

Dwight D. Eisenhower Republican Center: 310 First Street Southeast, Washington, D.C. 20003. (202) 484-6500.

LAW OFFICES
JENKINS, NYSTROM & STERLACCI, P.C.
2033 M STREET, N.W.
WASHINGTON, D.C. 20036
(202) 293-2505

MERLE R. JENKINS*
DENNIS H. NYSTROM*
MICHAEL A. STERLACCI*
JAMES F. SCHOENER*
STEPHEN J. HITCHCOCK
CHRIS M. PARFITT
GARY J. NYSTROM
CHARLES M. LOWTHER
MICHAEL A. MURPHY*^
JAMES M. SCHOENER
GERARD P. PANARO*+
JANIS B. DeGENNARO
ROBERT J. DeLUCIA*
RICHARD A. PEARSON*
MICHAEL J. TAUSCHER

OF COUNSEL
JOHN B. CONLAN*
JOHN F. GOETZ

MICHIGAN OFFICE
15999 WEST TWELVE MILE ROAD
SOUTHFIELD, MICHIGAN 48076
(313) 559-2828

*ADMITTED IN D.C.
^ADMITTED IN VA.
+ADMITTED IN MD.

January 15, 1981

MEMORANDUM

TO: Republican United States Senators

FROM: James Schoener, legal counsel, and
Rodney Smith, Treasurer
National Republican Senatorial Committee

RE: National Republican Candidate's Committee

1981 JAN 15 AM 8:36

83040354927

Recently a group calling itself the National Republican Candidates Committee was formed and sent out a test fund raising letter. This group shows its treasurer to be K.E. Dent or Richard Geske, and its self-proclaimed "National Finance Director" is listed as a John D. Romanin. We believe that a very large solicitation will be made in the next few days. This appeal will be ostensibly for debt reduction for Republican Senators and Congressmen. We have been unable to find any of our people who have authorized this group to act in their name.

The Federal Election Commission erroneously listed this group as an official party committee, but the R.N.C. has obtained a correction of that error. The National Committee, the National Republican Congressional Committee and our committee have tried to get the "candidates" committee to indicate that they are not an authorized official committee of the Republican Party, but we do not believe they will comply. We also object to their use of the names of President-

elect Reagan and various Senators without permission.

Since you may have inquiries concerning this organization, we urge you to:

1. Advise potential contributors that the National Republican Candidates Committee is not an official party fund raiser, and

2. That any contributions they may wish to make should be made payable directly to the Senator or Congressman the contributor wants to support, or

3. Send the funds directly to our committee with instructions stating which Senator they desired to benefit.

3304043547E

Republican
National
Committee

Bill Brock
Chairman

JAN 14 1981

January 13, 1981

The Honorable John W. McGarry
Chairman, Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

Dear Chairman McGarry:

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Your prompt and favorable consideration of this request will be greatly appreciated.

Very truly yours,

BILL BROCK

BB:ijd

cc: Charles N. Steel, Esq.
✓D. Richard Geske
John D. Romanin

8 3 0 4 0 1 3 5 4 9 9

Dwight D. Eisenhower Republican Center: 310 First Street Southeast, Washington, D.C. 20003. (202) 484-6500.

REPUBLICAN NATL COMM
FIRST ST SW
WASHINGTON DC 20003

Mailgram

1-231809U016013 01/16/81 ICS WA16614 WSHA
02308 MLTN VA 01/16/81

JAN 16 1981

JAN 19 1981

(Sent to all State Chairmen of the
Republican National Committee)

JANUARY 15,1981

THIS MESSAGE IS TO NOTIFY YOU THAT AN ORGANIZATION CALLING ITSELF THE NATIONAL REPUBLICAN CANDIDATE'S COMMITTEE IS UNDERTAKING DIRECT MAIL FUND RAISING OSTENSIBLY IN SUPPORT OF REPUBLICAN CANDIDATES. THIS ORGANIZATION HAS NOCONNECTION WITH THE REPUBLICAN NATIONAL COMMITTEE, THE REPUBLICAN NATIONAL SENATORIAL COMMITTEE, OR THE NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE.

WE RECOMMEND THAT YOU ADVISE INDIVIDUALS WHO INQUIRE IN REFERENCE TO THIS FUND RAISING ORGANIZATION THAT THE NATIONAL REPUBLICAN CANDIDATE'S COMMITTEE IS NOT A PARTY COMMITTEE AND THEN ENCOURAGE THEM TO CONTRIBUTE TO YOUR COMMITTEE, TO THE NATIONAL COMMITTEES, OR DIRECTLY TO REPUBLICAN CANDIDATES.

BILL BROCK, CHAIRMAN
REPUBLICAN NATIONAL COMMITTEE

7552
01:32 EST

MGMCOMP MGM

cc: D. Richard Geske

TO REPLY BY MAILGRAM, SEE REVERSE SIDE FOR WESTERN UNION'S TOLL - FREE PHONE NUMBERS

**BAKER & HOSTETLER**

ATTORNEYS AT LAW

[illegible] CONNECTICUT AVE., N.W.

WASHINGTON, D. C. 20006

(202) 861-1500

TELECOPIER (202) 857-0010

IN CLEVELAND, OHIO
3200 NATIONAL CITY CENTER
CLEVELAND, OHIO 44114
(216) 621-0200
TWX 810 421 8378

IN COLUMBUS, OHIO
100 EAST BROAD STREET
COLUMBUS, OHIO 43215
(614) 228-1541

IN DENVER, COLORADO
800 CAPITOL LIFE CENTER
DENVER, COLORADO 80203
(303) 861-0600

IN ORLANDO, FLORIDA
880 CNA TOWER
ORLANDO, FLORIDA 32802
(305) 841-1111

WRITER'S DIRECT DIAL NO.:
(202) 861-

March 6, 1981

RECEIVED
MAR 9 1981
SEDAM & HERGE

Robert R. Sparks, Jr., Esq.
Sedam & Herge
7600 Old Springhouse Road
McLean, Virginia 22102

Dear Bob:

Thank you for your letter of March 3, 1981, which informed us that your client, National Republican Candidates' Committee ("Committee") has taken formal steps to change its name to National Candidates' Committee. Our client, National Republican Congressional Committee ("NRCC"), is pleased and grateful that the Committee has voluntarily taken this action pursuant to our suggestion in order to avoid potential public confusion between the two organizations.

You mention in your letter that Messrs. Geske and Romanin are attributing certain purportedly libelous statements to "members of the Republican National Committee or its affiliates." As you know, we do not represent the Republican National Committee ("RNC"). Furthermore, the NRCC is not an "affiliate" of the RNC as such term is used in the Federal Election Campaign Act, as amended. Please advise your client that the NRCC totally denies that any member has expressed any intent to "get" any member of the Committee or have anyone incarcerated. Nor has any member of NRCC imputed dishonesty or fraud on the part of Romanin or Geske. Your clients' suspicions are unfounded as well as unsubstantiated.

NRCC is pleased that its present differences with the Committee have been informally resolved and regrets that the Committee chose not to informally discuss NRCC's concerns earlier as originally requested.

Very truly yours,

Jan W. Baran

cc: Larry Halloran, Esq.
Mr. Wyatt Stewart

9304043501

8 3 0 4 0 4 3 5 5 0 2

**SEDAM & HERGE**
**ATTORNEYS AT LAW**
**SUITE 1100**
**8300 GREENSBORO DRIVE**
**McLEAN, VIRGINIA 22102**

***To***

Kenneth A. Gross, Esquire
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463
Attention: Stephen Mims, Esquire

**FIRST CLASS MAIL**

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 23, 1982

Mr. J. Curtis Herge, Esquire
Sedam & Herge
8300 Greensboro Drive
McLean, VA 22102

Re: MUR 1363

Dear Mr. Herge:

This is in response to your letter dated March 10, 1982, in which you requested an extension of time for compliance with a subpoena issued by the Commission for the production of certain documents in connection with its investigation of MUR 1363.

The Office of General Counsel has considered your request and decided to extend the due date for compliance with the subpoena until March 26, 1982.

Should you have any additional matters you would like to discuss in connection with this MUR, please contact Stephen Mims, the staff member assigned to this matter, at (202)523-4060.

Sincrerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304043550

Ccc# 7330


**SEDAM & HERGE**
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
SUITE 1100
6300 GREENSBORO DRIVE
McLEAN, VIRGINIA 22102

(703) 821-1000

GLENN J. SEDAM, JR.
J. CURTIS HERGE
ROBERT R. SPARKS, JR.
A. MARK CHRISTOPHER

JANIS A. CHERRY
KAREN LUSSEN BLAIR
JOHN ROBERT CLARK III
B. ERIC SIVERTSEN

SUITE 270
1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(703) 821-1000

TELEX 710-831-0896

CABLE SEDAMHERGE


March 10, 1982

P2:08

Kenneth A. Gross, Esq.
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Attention: Stephen Mims, Esq.

Re: MUR 1363

Dear Mr. Gross:

This letter is written with reference to your letter, dated February 22, 1982, with which you enclosed a subpoena for the production of certain documents by Friday, March 12, 1982.

We are advised by our client that, because of the demands of scheduled business activities, it will not be possible for him to accumulate and produce the requested documents by March 12, 1982. Accordingly, we respectfully request an extension, until 10:00 a.m. on Friday, March 26, 1982, within which to comply with the subpoena.

Sincerely,

J. Curtis Herge

J. Curtis Herge


8 3 0 4 0 4 7 3 3 0

SEDAM & HERGE
ATTORNEYS AT LAW
1700 PENNSYLVANIA AVE., N. W.
WASHINGTON, D. C. 20006

Kenneth A. Gross, Esquire
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Attention: Stephen Mims, Esquire

1363 2/23/82

PS Form 3811, Jan. 1979

RETURN RECEIPT REGISTERED, INSURED AND CERTIFIED MAIL

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

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

   (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
   J. Curtis Hugg
   McLean, VA

3. ARTICLE DESCRIPTION:

| REGISTERED NO. | CERTIFIED NO. | INSURED NO. |
|---|---|---|
| | 943563 | |

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

POSTMARK

FEB 22 1982 USPS MCLEAN VA

☆GPO : 1979-300-[illegible]

B 3 0 4 0 4 3 5 5 0 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 22, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J. Curtis Herge, Esquire
Sedam and Herge
7600 Old Springhouse Road
McLean, Virginia 22102

Re: MUR 1363

Dear Mr. Herge:

On July 20, 1981, you received notification that the Commission had found reason to believe that your clients, MediaAmerica, Inc., National Candidates Committee, and Richard Geske, had violated the Federal Election Campaign Act of 1971, as amended ("the Act"). An investigation of this matter is being conducted and it has been determined that additional information is necessary. Consequently, the Federal Election Commission has issued the attached subpoena which requires your client, Richard Geske, to provide information which will assist it in carrying out its statutory duty of supervising compliance with the Act.

If you have any questions please direct them to Stephen Mims, the staff member handling this matter, at 202-523-4060.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena

3 3 0 4 0 4 3 5 0 7

BEFORE THE FEDERAL ELECTION COMMISSION

| | | |
|---|---|---|
| In the Matter of | ) | |
| | ) | |
| MediaAmerica, Inc., | ) | MUR 1363 |
| | ) | |
| The National Candidates Committee (formerly known as the National Republican Candidates Committee), and Richard Geske. | ) | |

SUBPOENA

TO: Richard Geske

Pursuant to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-styled matter, the Federal Election Commission hereby subpoenas:

1. The Articles of Incorporation of MediaAmerica, Inc.
2. The bylaws of MediaAmerica, Inc.
3. The bylaws of the National Candidates Committee (formerly known as the National Republican Candidates Committee)
4. All books, records, memoranda and other written materials in your possession or within your access or control which
   a) reflect time allocations for any employee of MediaAmerica who performed services for the National Candidates Committee;
   b) relate to the credit extended by MediaAmerica, Inc., to the National Candidates Committee including those materials which establish the basis for extending credit, the terms of the extension of credit, and payment schedules established by MediaAmerica, Inc.;
   c) relate to the terms for extensions of credit to all other political committees by MediaAmerica, Inc., during the period of January 1, 1980, through December 31, 1980, together with materials which establish the basis for extensions of credit, the terms of the extension of credit, and payment schedules established by MediaAmerica, Inc.;

8304043506

d) relate to the establishment of the National Candidates Committee including, but not limited to:
i. the organizational structure of the National Candidates Committee;
ii. the decision-making process within the committee; and
iii. the provisions for organizing the committee and for establishing the availability of initial working capital to cover overhead, fund-raising and other operating costs.

and any and all other such materials which pertain to the establishment and administration of and solicitation of contributions to and making of contributions by the National Candidates Committee.

Notice is given that these materials must be delivered to the Office of General Counsel, Federal Election Commission, 1325 K Street, N.W., Washington, D.C., on March 12, 1982, at 10:00 a.m. Upon inspection, the Office of General Counsel will copy those documents, or portions thereof, that it deems necessary, and will return the originals to you.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this 22nd day of February, 1982.

Frank P. Reiche

Frank P. Reiche
Chairman for the
Federal Election Commission

ATTEST:

Jody A. Custer

for Marjorie W. Emmons
Secretary to the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J. Curtis Herge, Esquire
Sedam and Herge
7600 Old Springhouse Road
McLean, Virginia

Re: MUR 1363

Dear Mr. Herge:

On July 20, 1981, you received notification that the Commission had found reason to believe that your clients, MediaAmerica, Inc., National Candidates Committee, and Richard Geske, had violated the Federal Election Campaign Act of 1971, as amended ("the Act"). An investigation of this matter is being conducted and it has been determined that additional information is necessary. Consequently, the Federal Election Commission has issued the attached subpoena which requires your client, Richard Geske, to provide information which will assist it in carrying out its statutory duty of supervising compliance with the Act.

If you have any questions please direct them to Stephen Mims, the staff member handling this matter, at 202-523-4060.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena

8 3 0 4 0 1 3 5 5 1 0

SWM 2/19/82

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JODY CUSTER jc

DATE: FEBRUARY 22, 1982

SUBJECT: SUBPOENA RE: MUR 1363

The attached subpoena, which was Commission approved on February 11, 1982 by a vote of 5-0, has been signed and sealed this date.

Attachment:
Subpoena

3 3 0 4 0 4 3 5 5 1 1

BEFORE THE FEDERAL ELECTION COMMISSION

| | | |
|---|---|---|
| In the Matter of | ) | |
| | ) | MUR 1363 |
| MediaAmerica, Inc. | ) | |
| | ) | |
| The National Candidates Committee (formerly known as the National Republican Candidates Committee), and Richard Geske | ) | |

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 11, 1982, the Commission decided by a vote of 5-0 to take the following actions in MUR 1363:

1. Authorize the subpoena to Richard Geske as submitted with the General Counsel's February 9, 1982 Memorandum to the Commission.

2. Approve the sending of the letter as submitted with the February 9, 1982 Memorandum to the Commission.

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

Attest:

2/12/82
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary: 2-9-82,12:41
Circulated on 48 hour tally basis: 2-9-82, 4:00

3 3 0 4 0 4 3 5 5 1 2

February 9, 1982

MEMORANDUM TO: Marjorie W. Emmons

FROM: Phyllis A. Kayson

SUBJECT: MUR 1363

Please have the attached Memo to the Commission distributed to the Commission on a 48 hour tally basis. Thankyou.

Attachment

cc: S.Mims

8 3 0 4 0 4 3 5 5 1 2

**SENSITIVE**

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

82 FEB 9 P12: 41

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 9, 1982

**MEMORANDUM TO:** The Commission

**FROM:** Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

**SUBJECT:** Authorization to issue Subpoena in Connection with MUR 1363

This matter involves allegations by the Republican National Committee, the National Republican Congressional Committee, and the National Republican Senatorial Committee against MediaAmerica, Inc., the National Republican Candidates Committee (now known as the National Candidates Committee, hereinafter referred to as the Committee), Karen E. Dent, Richard Geske and John D. Romanin. The complaint alleges the National Candidates Committee's failure to identify MediaAmerica, Inc. as its connected organization, 2 U.S.C. § 433(b)(2), and the Committee's violation of 2 U.S.C. § 441b(4)(A)(i) by soliciting contributions from persons other than executive or administrative personnel, stockholders or their families. Additionally, the complaint alleges that the Committee submitted reports signed by a person other than the treasurer of the Committee, 2 U.S.C. § 434(a)(1), and that solicitations by the Committee failed to provide the notice required by 2 U.S.C. § 441d(a)(3). The complaint alleges alternatively a violation of 2 U.S.C. § 441b(a) by MediaAmerica, Inc. for financing the activities of the Committee by subsidizing its overhead expenses and by extending credit for the rental of mailing lists.

On June 29, 1981, the Commission found reason to believe that the Committee violated 2 U.S.C. §§ 433(b)(2), 433(c), 432(e)(5), 441b(a) and 441b(b)(4)(A)(i), that MediaAmerica, Inc. violated 2 U.S.C. §§ 441b(a) and 441b(b)(4)(A)(i), and that Richard Geske, President of MediaAmerica, violated 2 U.S.C. § 441b(a). The notification letters were sent to the respondents in early July. Throughout July and August communications were held between

3 2 0 4 0 4 3 5 5 1 4

counsel for the respondents and Office of General Counsel staff regarding the substance of the allegations and whether the respondents would seek pre-probable cause conciliation.

On July 31, 1981, the Office of General Counsel received a response to the Commission's reason to believe determinations in which respondents requested pre-probable cause conciliation, but only as to the Committee's failure to timely amend its Statement of Organization listing its treasurer. Respondents' counsel was informed that, due to certain factual questions left unanswered by the response, and due to respondents' apparent desire not to conciliate as to the central issue involving 2 U.S.C. § 441b, this Office was not prepared to enter into pre-probable cause conciliation.

On September 16, 1981, the former Committee treasurer, Shirley S. King, contacted this Office and voluntarily agreed to submit to a deposition regarding these matters. Her deposition was taken on October 19, 1981. Although not a respondent in this MUR, Mrs. King presented information to this Office which appeared to contradict the response filed by counsel for respondents on February 25, 1981. As an employee of MediaAmerica, Inc., Mrs. King produced testimony which asserted an active involvement by MediaAmerica, Inc. and some of its officers and directors in the affairs of the committee which lends support to the Commission's reason to beleive determinations. Mrs. King also provided the names of several other individuals who would appear to have knowledge of the matters at issue. We are presently trying to contact and depose, pursuant to a voluntary arrangement, certain of those individuals who have been fired by MediaAmerica or who have no current connection with the firm.

In order to obtain further information from the respondents themselves, this Office considers it necessary to have certain documents produced for inspection and copying. The subpoena for such documents should be directed to Richard Geske, President of MediaAmerica, Inc., and Chairman of the Committee, through Mr. Herge, his counsel. The documents requested may provide us with further information as to direct involvement by MediaAmerica, Inc., in both the financing and direction of the Committee as well as the level of involvement of certain officers and directors of MediaAmerica, Inc., in those matters. Therefore, the General Counsel recommends that the Commission approve the issuance of the attached subpoena for documents.

Recommendations

1. Authorize the attached subpoena to Richard Geske.
2. Approve sending the attached letter.

Attachments

1. Subpoena to Richard Geske
2. Proposed letter

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BEFORE THE FEDERAL ELECTION COMMISSION

| | | |
|---|---|---|
| In the Matter of | ) | |
| | ) | |
| MediaAmerica, Inc., | ) | MUR 1363 |
| | ) | |
| The National Candidates Committee (formerly known as the National Republican Candidates Committee), and Richard Geske. | ) | |

SUBPOENA

TO: Richard Geske

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3. The bylaws of the National Candidates Committee (formerly known as the National Republican Candidates Committee)
4. All books, records, memoranda and other written materials in your possession or within your access or control which
   a) reflect time allocations for any employee of MediaAmerica who performed services for the National Candidates Committee;
   b) relate to the credit extended by MediaAmerica, Inc., to the National Candidates Committee including those materials which establish the basis for extending credit, the terms of the extension of credit, and payment schedules established by MediaAmerica, Inc.;
   c) relate to the terms for extensions of credit to all other political committees by MediaAmerica, Inc., during the period of January 1, 1980, through December 31, 1980, together with materials which establish the basis for extensions of credit, the terms of the extension of credit, and payment schedules established by MediaAmerica, Inc.;

Attachment 1
page 1 of 2

d) relate to the establishment of the National Candidates Committee including, but not limited to:
i. the organizational structure of the National Candidates Committee;
ii. the decision-making process within the committee; and
iii. the provisions for organizing the committee and for establishing the availability of initial working capital to cover overhead, fund-raising and other operating costs.

and any and all other such materials which pertain to the establishment and administration of and solicitation of contributions to and making of contributions by the National Candidates Committee.

Notice is given that these materials must be delivered to the Office of General Counsel, Federal Election Commission, 1325 K Street, N.W., Washington on February , 1982, at 10:00 a.m. Upon inspection, the Office of General Counsel will copy those documents, or portions therof, that it deems necessary, and will return the originals to you.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this _____day of_____, 1982.

_____

Frank P. Reiche
Chairman for the Federal Election Commission

ATTEST:

_____
Marjorie W. Emmons
Secretary to the Commission

Attachment 1
Page 2 of 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J. Curtis Herge, Esquire
Sedam and Herge
7600 Old Springhouse Road
McLean, Virginia

Re: MUR 1363

Dear Mr. Herge:

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If you have any questions please direct them to Stephen Mims, the staff member handling this matter, at 202-523-4060.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena

Attachment 2

OGC Docket
Copy 1

SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY
2-9-82, 4:00

82 FEB 9 P12: 41

February 9, 1982

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

SUBJECT: Authorization to issue Subpoena in Connection with MUR 1363

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8 3 0 4 0 4 3 5 5 1 3

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Recommendations

1. Authorize the attached subpoena to Richard Geske.
2. Approve sending the attached letter.

Attachments

1. Subpoena to Richard Geske
2. Proposed letter

8 3 0 4 0 4 3 5 5 2 0

**BEFORE THE FEDERAL ELECTION COMMISSION**

| | | |
|---|---|---|
| In the Matter of | ) | |
| | ) | |
| MediaAmerica, Inc., | ) | MUR 1363 |
| | ) | |
| The National Candidates Committee (formerly known as the National Republican Candidates Committee), and Richard Geske. | ) | |

**SUBPOENA**

TO: Richard Geske

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8 3 0 4 0 4 3 5 5 2 1

Attachment 1
page 1 of 2

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i. the organizational structure of the National Candidates Committee;
ii. the decision-making process within the committee; and
iii. the provisions for organizing the committee and for establishing the availability of initial working capital to cover overhead, fund-raising and other operating costs.

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WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this _____day of_____, 1982.

_____

Frank P. Reiche
Chairman for the Federal Election Commission

ATTEST:

_____
Marjorie W. Emmons
Secretary to the Commission

Attachment 1
page 2 of 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J. Curtis Herge, Esquire
Sedam and Herge
7600 Old Springhouse Road
McLean, Virginia

Re: MUR 1363

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If you have any questions please direct them to Stephen Mims, the staff member handling this matter, at 202-523-4060.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena

Attachment 2

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Gec # 5187

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/JODY CUSTER JC

DATE: JULY 31, 1981

SUBJECT: REFERRAL OF LETTER REGARDING MUR 1363

The attached letter regarding MUR 1363 was received in Chairman McGarry's office and then forwarded to the Secretary of the Commission. It is provided for your action.

Attachment:
Letter dated July 30, 1981

83040435524

AUG 3 A9:40

SEDAM & HERGE
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
7600 OLD SPRINGHOUSE ROAD
McLEAN, VIRGINIA 22101

(703) 821-1000

GLENN J. SEDAM, JR.
J. CURTIS HERGE

ROBERT R. SPARKS, JR.
MICHAEL D. HUGHES
A. MARK CHRISTOPHER
KAREN LUSSEN BLAIR
JOHN ROBERT CLARK III

1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(202) 393-7124

TWX/TELEX: 710-831-0896

CABLE: SEDAMHERGE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

81 JUL 31 P2:05

July 30, 1981

The Honorable John Warren McGarry
Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Attention: Mr. Steve Mims
Office of General Counsel

Re: MUR 1363

Dear Mr. Chairman:

This letter is written on behalf of our clients, MediAmerica, Inc.; Mr. D. Richard Geske; and National Candidates Committee (formerly known as National Republican Candidates' Committee), in reply to your letter of July 17, 1981 with respect to the above-captioned matter.

In your letter of July 17, 1981, you reported that the Federal Election Commission had found reason to believe that one or more of our clients may have violated one or more sections of the Federal Election Campaign Act of 1971, as amended. Those findings fell into two basic categories, as follows:

(1) That there is reason to believe that National Candidates Committee may have violated 2 U.S.C. 433(c) for failing to amend its Statement of Organization within ten days after the date of the change in information previously submitted; and,

(2) That there is reason to believe that MediAmerica, Inc. may have violated 2 U.S.C. 441b(a) and 441b(b)(4)(A)(i); that Mr. D. Richard Geske may have violated 2 U.S.C. 441b(a); and, that National Candidates Committee may have violated 2 U.S.C. 432(e)(5), 433(b)(2), 441b(a) and 441b(b)(4)(A)(i), all by reason of the fact that MediAmerica, Inc. appears to be the connected organization of National Candidates Committee, or that National Candidates Committee appears to be the separate segregated fund of MediAmerica, Inc.; and that, if so, our clients did not conduct their activities in conformity with the requirements of the Act.

We believe an orderly analysis would be to address the merits of each of those two categories of findings.

(1) That National Candidates Committee May Have Violated 2 U.S.C. 433(c)

On July 14, 1981, the Federal Election Commission (the Commission) found reason to believe that National Candidates Committee (NCC) may have violated 2 U.S.C. 433(c) for failing to amend its Statement of Organization within ten days after the date of the change in information previously submitted. That finding was based upon the fact that Mr. John D. Romanin assumed the office of treasurer of NCC on or

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about July 23, 1980; that he served as such until on or about January 13, 1981; and, that an amended Statement of Organization was not filed to record that fact until the matter was brought to the attention of counsel. (The amended Statement of Organization was filed with counsel's letter dated February 25, 1981.)

NCC admits that it violated 2 U.S.C. 433(c) by reason of the foregoing facts. Accordingly, NCC advises the General Counsel, through you and in accordance with the provisions of 11 CFR 111.18(d), of its desire to enter into negotiations directed towards reaching a conciliation agreement prior to a finding of probable cause as to this particular finding. Should this request be accepted, we direct the attention of the Commission to the factors that should be taken into consideration in mitigation of the violation. Those factors were described in detail in our letter of February 25, 1981 and include (1) the fact that the original treasurer of NCC suddenly failed to report to work on or about July 23, 1980, leading to a finding of irregularities in other financial records maintained by that individual and her eventual arrest; (2) the expected and justifiable pre-occupation of Mr. Geske and Mr. Romanin with the turmoil

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occasioned by the incident with the treasurer to the extent that the affairs of NCC were neglected for several months; (3) the fact, as may be noted from the technically deficient and untimely filings of NCC's Reports and other demonstrable evidence, that none of the persons associated with the NCC had a basic understanding of the Act, no less an awareness of the specific requirements of 2 U.S.C. 433(c); (4) the fact that an amended Statement of Organization was filed as soon as the problem was brought to the attention of counsel; (5) the fact that, as evidenced by our letter of February 25, 1981, the violation was never subject to interpretation and was thus forthrightly admitted. As a consequence, NCC is prepared to admit a violation of 2 U.S.C. 433(c) in a conciliation agreement, but avers the penalty under the circumstances should be nominal.

(2) That MediAmerica, Inc., Mr. D. Richard Geske and NCC May Have Violated Certain Other Sections of the Act

On July 14, 1981, the Commission also found reason to believe that MediAmerica, Inc. may have violated 2 U.S.C. 441b(a) and 441b(b)(4)(A)(i); that Mr. D. Richard Geske may have violated 2 U.S.C. 441b(a); and, that NCC may have

violated 2 U.S.C. 432(e)(5), 433(b)(2), 441b(a) and 441b(b)(4)(A)(i). All of those findings were predicated upon a threshold finding that MediAmerica, Inc. "appears to be" the connected organization of NCC, or that NCC "appears" to be the separate segregated fund of MediAmerica, Inc. It is possible to substantiate those alleged violations only if those "appearances" were found to be correct. Alternatively, all the alleged violations would be moot if those "appearances" were found to be incorrect.

Our clients deny that MediAmerica, Inc. is the connected organization of NCC and, alternatively, deny that NCC is the separate segregated fund of MediAmerica, Inc. As defined in 2 U.S.C. 431(7), the term "connected organization" means any organization which is not a political committee but which directly or indirectly establishes, administers, or financially supports a political committee. The facts of this matter do not and cannot support a finding that Medi-America, Inc. directly or indirectly established, administered or financially supported NCC.

As explained in our letter of February 25, 1981, the genesis of NCC is that it was eventually organized as a consequence of a conversation between Mr. Geske and Mr. Romanin

about the potential impact on Federal elections of the so-called Obey-Railsback campaign reform legislation. In the view of Messrs. Geske and Romanin, who happen to be personal friends as well as business colleagues, the Federal Election Campaign Act of 1971, as amended, and the Obey-Railsback bill encouraged the organization and operation of multicandidate political committees. It was the specific objective of Messrs. Geske and Romanin that they join together as private individuals to organize a committee that could be operated at a limited cost and that could utilize mass direct-mail solicitation techniques to solicit contributions. In their view, it would be possible to engage MediAmerica, Inc., an advertising firm with experience in commercial direct-mail techniques and with which they were associated, to produce the direct-mail solicitations on a reimbursable basis.

There is no evidence or indication whatsoever that the proposal to organize, or the organization of, NCC was brought to the attention of the Board of Directors of MediAmerica, Inc. Furthermore, Mr. Geske, as President of Mediamerica, Inc., had no real or apparent authority to establish a separate segregated fund of MediAmerica, Inc. without the approval and authorization of the corporation's Board of Directors; and, any attempt to do so would have been ultra

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vires under applicable corporate law. As a consequence, the organization of NCC was not the corporate act of MediAmerica, Inc. Therefore, it cannot be concluded that MediAmerica, Inc. "established" NCC.

A conclusion that MediAmerica, Inc. established NCC as its separate segregated fund leads to an absurd result. Mr. Geske advises that, at the time NCC was organized, he had a general awareness of the fact that a political action committee of a corporation is severely limited in from whom it may solicit contributions. MediAmerica, Inc. has one individual stockholder and approximately six executive or administrative personnel on its staff. In view of the fact that it was the intention of Mr. Geske and Mr. Romanin, in establishing NCC, to raise its funds through mass direct-mail solicitations, it would be illogical to conclude that Mr. Geske and Mr. Romanin intended to establish NCC as the separate segregated fund of MediAmerica, Inc. which could solicit contributions from only seven people. To the contrary, Mr. Geske and Mr. Romanin were acting as private individuals, and not as corporate officers of MediAmerica, Inc., when they established NCC. There is nothing in the Act which denies individuals, when joining together to form a political

committee, their right of association, or their right to act in their private capacities, just because they also happen to work together for the same employer.

Furthermore, there is no evidence or indication whatsoever that MediAmerica, Inc. administered NCC. To the contrary, NCC engaged MediAmerica, Inc. to produce its direct-mail solicitations in return for a fee. The files of the Commission are replete with examples of authorized and unauthorized political committees which commence operations with little or no capital; which engage the services of direct-mail firms to develop a contributor base; and, which have no assets or office facilities other than a post office box or mail drop. The Act does not mandate otherwise, only that fees incurred in providing goods and services be paid within a commercially reasonable time. The only control the Board of Directors of MediAmerica, Inc. had over NCC was whether or not to accept NCC as a client. The Board had no authority to "administer" NCC. All decisions relating to the administration of NCC were made by Mr. Geske and Mr. Romanin in their private capacities. As set forth in detail in our letter of February 25, 1981, any time spent by MediAmerica, Inc. employees on NCC affairs during the business

day was either incidental as defined in 11 CFR 114.9(a); or, if not incidental, was billed to NCC by MediAmerica, Inc. for reimbursement. This was consistent with the objectives of Mr. Geske, in establishing the committee, that NCC be operated with the lowest possible overhead consistent with the law.

Finally, there is no evidence or indication whatsoever that MediAmerica, Inc. financially supported NCC. Financial support, in the context of 2 U.S.C. 431(7), refers to the payment by a connected organization of the costs of establishing, administering and soliciting contributions to its separate segregated fund. 2 U.S.C. 441b(b)(2)(C), 11 CFR 114.5(b). In this matter, NCC paid or was billed for all of those costs.

In its Post General Election Report, NCC reported an obligation due MediAmerica, Inc. of $9,305.92, of which $8,305.92 was for the production and mailing of its first solicitation and $1,000.00 was for administrative and operating costs. Copies of the applicable invoices were provided to you with our letter of February 25, 1981. Of that obligation, NCC paid MediAmerica, Inc. the sum of $4,500.00 within a commercially reasonable time on December 1, 1980.

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In its Year-End Report, NCC reported that it incurred an additional obligation to MediAmerica, Inc. of $10,608.10, of which $9,543.60 was for the production and mailing of the second solicitation and $1,064.50 was for administrative and operating costs. Copies of the applicable invoices were provided to you with our letter of February 25, 1981. On December 1, 1980, NCC paid MediAmerica, Inc. $1,064.50 and, on January 10, 1981, NCC paid MediAmerica, Inc. an additional $2,000.00. Furthermore the Year-End Report shows that NCC paid $275.00 directly to the landlord on December 1, 1980 for rental of the office space it utilizes.

As a consequence, it is evident that NCC has been billed for, and has paid, the cost of its solicitations and for its pro-rata expenses for space and equipment rental, supplies and administrative costs. To the extent that MediAmerica, Inc. has presently outstanding any unpaid invoices due it from NCC, it is due to the advice of counsel that NCC not solicit any additional contributions until this matter is resolved. Therefore, it cannot be said that MediAmerica, Inc. has not been paid in full within a commercially reasonable time, because it is due to the pendency of this matter that the cash flow of NCC has been curtailed.

In considering this matter, it should be kept in mind that MediAmerica, Inc. is a commercial firm which engages in the production of direct-mail advertising and solicitation programs. MediAmerica, Inc. was engaged to render that service to NCC. That relationship, as vendor and customer, neither makes MediAmerica, Inc. the connected organization of its customer political committees, nor does it make its customer political committees affiliated. (See, MUR 303 and note particularly the relationship in that matter between the Committee for Responsible Youth Politics and The Viguerie Company.) Furthermore, as evidenced by numerous other examples, it is not unusual or unlawful for a direct-mail firm to advance production costs to its customer political committee, or to have a political committee indebted to a direct-mail firm, so long as the debt is paid within a commercially reasonable time.

(3) Summary

In summary, NCC admits it violated 2 U.S.C. 433(c) for the reasons and under the circumstances stated herein; and, expresses its desire to enter into negotiations directed towards reaching a conciliation agreement prior to a finding

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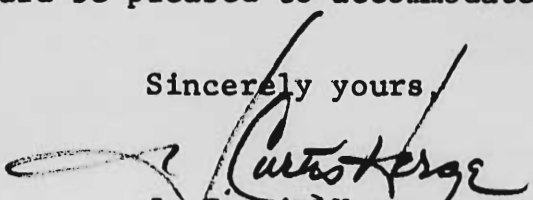
of probable cause as to that violation. On the other hand, it is evident that MediAmerica, Inc. is not the connected organization of NCC and that NCC is not the separate segregated fund of MediAmerica, Inc. As a consequence, the balance of the alleged violations should be dismissed as moot.

In the event additional information or documentation is required, or in the event you should like to depose Mr. Geske or others, we would be pleased to accommodate you.

Sincerely yours,



J. Curtis Herge
Counsel to National Candidates
Committee, MediAmerica, Inc.
and Mr. D. Richard Geske

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SEDAM & HERGE, P.C.
ATTORNEYS AT LAW
7600 OLD SPRINGHOUSE ROAD
McLEAN, VIRGINIA 22102

*To:* The Honorable John Warren McGarry
Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463
Attention: Mr. Steve Mims
Office of General Counsel

**FIRST CLASS MAIL**

JUL 31 PM 2:19

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Karen E. Dent
4608 North 26th Street
Arlington, VA 22207

Re: MUR 1363

Dear Ms. Dent

On February 18, 1981, the Commission notified you of a complaint alleging that you had violated certain provisions of the Federal Election Campaign Act of 1971, as amended.

The Commission, on , 1981, determined that on the basis of the information in the complaint and information provided by counsel for the National Republican Candidates Committee, et. al., there is no reason to believe that a violation of any statute within its jurisdiction had been committed by you.

Sincerely,

Charles N. Steele

General Counsel

by: Kenneth A. Gross
Associate General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. J. Curtis Herge, Esq.
Sedam & Herge
7600 Old Springhouse Road
McLean, VA 22102

Re: MUR 1363

Dear Mr. Herge:

The Federal Election Commission notified your clients on January 30, 1981, of a complaint which alleges that your clients had violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time. We acknowledge receipt of your explanation of this matter which was dated February 25, 1981.

Upon further review of the allegations contained in the complaint, and information submitted by you, the Commission, on , 1981, determined that:

1. because certain key principals of MediaAmerica, Inc., (MediaAmerica) are actively involved in the affairs of the, National Republican Candidates Committee (NRCC), and because MediaAmerica has provided funds and services for the establishment and administration of NRCC, MediaAmerica appears to be the connected organization of NRCC, 2 U.S.C. § 431(17). There is, therefore, reason to believe that MediaAmerica violated 2 U.S.C. §§ 441b(a) and 441b(b)(4)(A)(i) by financing communications with and solicitation of contributions from persons outside the permissible class, and that Richard Geske, as President and Director of MediaAmerica, Inc., violated 2 U.S.C. § 441b(a) by consenting to contributions and expenditures made by MediaAmerica, Inc.

2. because it appears that NRCC is the separate segregated fund of MediaAmerica, there is reason to believe that NRCC violated 2 U.S.C. §§ 441b(a) and 441b(b)(4)(A)(i) by communicating with and soliciting contributions to a separate segregated fund established by a corporation from persons outside the permissible class for such a fund;

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SM 7/16/81

3. because NRCC failed to include in its name the name of its connected organization there is reason to believe that NRCC violated 2 U.S.C. § 432(e)(5);

4. because NRCC failed to include the name of its connected organization on its Statement of Organization, there is reason to believe that NRCC violated 2 U.S.C. § 433(b)(2);

5. because NRCC failed to amend its Statement of Organization within ten days from the time of a change in the office of treasurer, or other change in previously reported information, there is reason to believe that NRCC violated 2 U.S.C. § 433(c);

6. because NRCC has the responsibility of amending its Statement of Organization within ten days from the date of a change in previously reported information (see #5 above) there is no reason to believe that John D. Romanin individually violated 2 U.S.C. § 433(b)(2);

7. because NRCC appears to be the separate segregated fund of MediaAmerica and thereby restricted to solicitations of a limited class, there is no reason to believe that NRCC violated 2 U.S.C. § 441d(a) or 11 C.F.R. § 110.11(a)(1).

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

The Office of General Counsel would like to settle this matter through conciliation prior to finding probable cause. See 11 C.F.R. § 111.18(d). However, in the absence of any information which demonstrates that no further action should be taken against your clients, the Office of General Counsel must proceed to the next complaince stage as noted on page 2, paragraph 2 of the enclosed procedures.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you have any questions, please contact Steve Mims, the staff member assigned to this matter at (202) 523-4060.

Sincerely,

Enclosure
Procedures

SM 7/16/81

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1363 Mcms

PS Form 3811, Jan. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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

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

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

Karen E. Dent
4608 North 26th Street
Arlington, VA 22207

3. ARTICLE DESCRIPTION:

| REGISTERED NO. | CERTIFIED NO. | INSURED NO. |
|---|---|---|
| | 2538h | |

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

Eva Wood

4. DATE OF DELIVERY
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5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

POSTMARK
ARLINGTON, VA NORTH
USPO
JUL 18 1981
STA

☆GPO : 1978-240-159

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 17, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Karen E. Dent
4608 North 26th Street
Arlington, VA 22207

Re: MUR 1363

Dear Ms. Dent

On February 18, 1981, the Commission notified you of a complaint alleging that you had violated certain provisions of the Federal Election Campaign Act of 1971, as amended.

The Commission, on July 14, 1981, determined that on the basis of the information in the complaint and information provided by counsel for the National Republican Candidates Committee, et. al., there is no reason to believe that a violation of any statute within its jurisdiction had been committed by you.

Sincerely,

Charles N. Steele
General Counsel

by: Kenneth A. Gross
Associate General Counsel

9304035516

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 17, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. J. Curtis Herge, Esq.
Sedam & Herge
7600 Old Springhouse Road
McLean, VA 22102

Re: MUR 1363

Dear Mr. Herge:

The Federal Election Commission notified your clients on January 30, 1981, of a complaint which alleges that your clients had violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time. We acknowledge receipt of your explanation of this matter which was dated February 25, 1981.

Upon further review of the allegations contained in the complaint, and information submitted by you, the Commission, on July 14 , 1981, determined that:

1. because certain key principals of MediaAmerica, Inc., (MediaAmerica) are actively involved in the affairs of the, National Republican Candidates Committee (NRCC), and because MediaAmerica has provided funds and services for the establishment and administration of NRCC, MediaAmerica appears to be the connected organization of NRCC, 2 U.S.C. § 431(17). There is, therefore, reason to believe that MediaAmerica violated 2 U.S.C. §§ 441b(a) and 441b(b)(4)(A)(i) by financing communications with and solicitation of contributions from persons outside the permissible class, and that Richard Geske, as President and Director of MediaAmerica, Inc., violated 2 U.S.C. § 441b(a) by consenting to contributions and expenditures made by MediaAmerica, Inc.

2. because it appears that NRCC is the separate segregated fund of MediaAmerica, there is reason to believe that NRCC violated 2 U.S.C. §§ 441b(a) and 441b(b)(4)(A)(i) by communicating with and soliciting contributions to a separate segregated fund established by a corporation from persons outside the permissible class for such a fund;

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1363 Mins

PS Form 3811, Jan. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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

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

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
J. Curtis Herge, Esq.
Sedam & Herge
7600 Old Springhouse Rd
McLean, VA 22102

3. ARTICLE DESCRIPTION:

| REGISTERED NO. | CERTIFIED NO. | INSURED NO. |
|---|---|---|
| | 625254 | |

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent
Linda L. Hallas

4. DATE OF DELIVERY
7-20-81

POSTMARK (OPTIONAL)
JUL 1981

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆GPO : 1979-300-429

FILED
81 JUL 27 A8:41

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3. because NRCC failed to include in its name the name of its connected organization there is reason to believe that NRCC violated 2 U.S.C. § 432(e)(5);

4. because NRCC failed to include the name of its connected organization on its Statement of Organization, there is reason to believe that NRCC violated 2 U.S.C. § 433(b)(2);

5. because NRCC failed to amend its Statement of Organization within ten days from the time of a change in the office of treasurer, or other change in previously reported information, there is reason to believe that NRCC violated 2 U.S.C. § 433(c);

6. because NRCC has the responsibility of amending its Statement of Organization within ten days from the date of a change in previously reported information (see #5 above) there is no reason to believe that John D. Romanin individually violated 2 U.S.C. § 433(b)(2);

7. because NRCC appears to be the separate segregated fund of MediaAmerica and thereby restricted to solicitations of a limited class, there is no reason to believe that NRCC violated 2 U.S.C. § 441d(a) or 11 C.F.R. § 110.11(a)(1).

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

The Office of General Counsel would like to settle this matter through conciliation prior to finding probable cause. See 11 C.F.R. § 111.18(d). However, in the absence of any information which demonstrates that no further action should be taken against your clients, the Office of General Counsel must proceed to the next complaince stage as noted on page 2, paragraph 2 of the enclosed procedures.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you have any questions, please contact Steve Mims, the staff member assigned to this matter at (202) 523-4060.

Sincerely,

John Warren McGarry

JOHN WARREN McGARRY
Chairman

Enclosure
Procedures

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BEFORE THE FEDERAL ELECTION COMMISSION

| | | |
|---|---|---|
| In the Matter of | ) | |
| | ) | |
| National Republican Candidates | ) | |
| Committee | ) | MUR 1363 |
| MediaAmerica, Inc. | ) | |
| K [Karen] E. Dent | ) | |
| Richard Geske | ) | |
| John D. Romanin | ) | |

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on July 14, 1981, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 1363:

1. FIND REASON TO BELIEVE that:

   a) MediaAmerica violated 2 U.S.C. §§441b(a) and 441b(b)(4)(A)(i);

   b) NRCC violated 2 U.S.C. §§432(e)(5), 433(c), 433(b)(2), 441b(a), and 441b(b)(4)(A)(i).

2. FIND NO REASON TO BELIEVE that:

   a) NRCC violated 2 U.S.C. §441d(a) or 11 C.F.R. §110.11(a)(1);

   b) Karen E. Dent violated 2 U.S.C. §§433(b)(2) or 434(a)(1);

   c) John D. Romanin violated 2 U.S.C. §433(b)(2).

3. FIND REASON TO BELIEVE that Richard Geske violated 2 U.S.C. §441b(a).
4. Send appropriate letters to respondents.

Attest:

7-14-81

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/JODY CUSTER

DATE: JULY 2, 1981

SUBJECT: OBJECTION - MUR 1363 First General Counsel's Report, dated 6-29-81; Received in OCS, 6-29-81, 3:20

The above-named document was circulated on a 48 hour vote basis at 11:00, June 30, 1981.

Commissioner Aikens submitted an objection at 5:39, July 1, 1981.

This matter will be placed on the Executive Session Agenda for Tuesday, July 14, 1981.

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June 29, 1981

MEMORANDUM TO: Marjorie W. Emmons

FROM: Phyllis A. Kayson

SUBJECT: MUR 1363

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

Attachment

cc: Mims

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SENSITIVE

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

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

81 JUN 29 P 3: 20

# FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION 6-29-81

MUR # 1363
DATE COMPLAINT RECEIVED
BY OGC January 16, 1981

STAFF MEMBER Steve Mims

COMPLAINANTS' NAMES: Donald L. Ivers, Mark E. Goldhaber, and James F. Schoener on behalf of the Republican National Committee, the National Republican Congressional Committee and the National Republican Senatorial Committee, respectively.

RESPONDENTS' NAMES: National Republican Candidates Committee (NRCC or committee), MediaAmerica, Inc. (MediaAmerica), K. [Karen] E. Dent (Dent), Richard Geske (Geske) and John D. Romanin (Romanin).

RELEVANT STATUTE: 2 U.S.C. §§ 432(e)(5), 433(b)(2), 433(c), 434(a)(1), 441b(a), 441b(b)(4)(A)(i), 441d(a).

INTERNAL REPORTS CHECKED: All reports and statements filed by the Committee through March 10, 1981.

## SUMMARY OF ALLEGATIONS

It is alleged that respondent committee, failed to indicate MediaAmerica as its connected organization on its Statement of Organization, 2 U.S.C. § 433(b)(2), and that as a separate segregated fund of MediaAmerica, it solicited contributions from persons other than executive or administrative personnel, stockholders or their families, 2 U.S.C. § 441b(b)(4)(A)(i). Furthermore, it is alleged that NRCC submitted reports signed by a person other than the treasurer of the committee, 2 U.S.C. § 434(a)(1), and that solicitations by the committee failed to provide the notice required by 2 U.S.C. § 441d(a)(3).

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As to respondent Dent, it is alleged that as treasurer of the Committee, she failed to sign reports submitted by the Committee, 2 U.S.C. § 434(a)(1), and that the Statement of Organization submitted by Dent failed to indicate MediaAmerica as the connected organization of NRCC.

As to respondent MediaAmerica, it is alleged that it is the connected organization of the committee or, in the alternative, that MediaAmerica violated 2 U.S.C. § 441b(a) by financing the activities of the committee by subsidizing its overhead expenses and through extensions of credit for the rental of mailing lists.

As to respondent Geske, it is alleged that if MediaAmerica is not the connected organization of the Committee, Geske, as an officer and director of MediaAmerica, violated 2 U.S.C. § 441b(a) by consenting to the subsidization of the committee's overhead and extensions of credit for the rental of mailing lists to the Committee by MediaAmerica.

As to respondent Romanin, it is alleged that if he was not treasurer of NRCC, he violated 18 U.S.C. §1001 by signing the October 15 Quarterly Report and Post General Election Report as treasurer or, in the alternative, if he is the treasurer, he failed to show, on the Committee's Statement of Organization, a change in the office of treasurer. In addition, if Romanin is the treasurer, he failed to show MediaAmerica as the committee's connected organization on its Statement of Organization.

It is further alleged that respondents did knowingly and willfully violate the Act. See Attachment 1.

## FACTUAL AND LEGAL ANALYSIS

### A. Whether MediaAmerica is the connected organization of the NRCC; whether MediaAmerica violated 2 U.S.C. § 441b(a);

Under 2 U.S.C. § 433(b)(2), a committee must list on its Statement of Organization, "the name, address, relationship, and type of any connected organization...." The term "connected organization" is defined as "any organization which is not a political committee but which directly or indirectly establishes, administers or financially supports a political committee." 2 U.S.C. § 431(7).

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Complainants allege that MediaAmerica did incur costs which constituted financial support of the committee and that such costs, if not borne by a connected organization, constituted a violation of 2 U.S.C. § 441b(a). The costs apparently involved included use of corporate facilities (including utilities), clerical support, the services during company time of an officer of the company, as well as office supplies provided and postage spent on behalf of the committee. If MediaAmerica is the connected organization of NRCC, such expenditures could be considered permissible if within the restrictions of 2 U.S.C. § 441b(b)(2)(C).

In a reply by counsel on behalf of all but one respondent (Dent), submitted on February 25, 1981, it is denied that MediaAmerica violated 2 U.S.C. § 441b(a) or that it is the connected organization of the committee. See attachment 2. There has been no response by respondent Dent. Respondents adopt the position that the amount of company time utilized by respondents as employees of MediaAmerica was "incidental" and within the limits established for volunteer activity by 11 C.F.R. § 114.9(a) of the regulations which establishes a standard that the use of corporate facilities by employees during working hours must not prevent the employees from completing the normal amount of work.

Respondents point out that the committee was billed for the use of office equipment and supplies and that the committee paid a pro rata portion of the rent. Furthermore, respondents assert that MediaAmerica billed the committee for the costs of the direct mail services within a commercially reasonable time, and while there is an outstanding balance due on the invoices, no part of the outstanding balance has exceeded a period which would be considered "commercially reasonable in the trade." Respondents further contend that any credit extended to the committee by MediaAmerica was not out of the normal course of business and thus did not violate 2 U.S.C. § 441b(a).

A review of the committee's reports submitted through December 31, 1980, shows that of the $11,103.52 spent during the committee's existence, $5,000 was contributed to federal candidates (none on behalf of or to Presidential candidates) and that the remaining expenditures ($5,564.50) were paid to MediaAmerica. The outstanding debt owed to MediaAmerica is $14,349.52. The first time a debt was reported owed to MediaAmerica was for services rendered as part of a solicitation effort on October 25 and 26, 1980. To date, payment towards the amount due has been in the amount of $5,564.50.

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Although respondents urge that the relationship between MediaAmerica and NRCC is merely one of vendor-vendee, the evidence available suggests that it would have been unlikely that NRCC could have functioned as a political committee without MediaAmerica's direct assistance. MediaAmerica did, in effect, contribute those services necessary for the establishment and maintenance of a political committee. Furthermore all participants in the operations of NRCC are (or, in the case of respondent Dent, were) employees of MediaAmerica. Geske and Romanin are officers of MediaAmerica (See affidavit by E.M. Braden attached to the original complaint). Respondents' reply admits that MediaAmerica did advance corporate facilities, utilities, and supplies to NRCC. The fact that NRCC reimbursed MediaAmerica for those services, facilities and supplies does not mitigate the effect MediaAmerica had upon the establishment of NRCC. 1/

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1/ The motive for such an arrangement would appear to stem from the business interests of MediaAmerica. As officers of MediaAmerica, Geske and Romanin are under a fiduciary obligation to MediaAmerica to act in a manner consistent with the bests interests of MediaAmerica. The likelihood that a corporation would extend such services, supplies and other forms of credit to a newly established political committee without some prospect of recovering its investment is questionable. In the present case, advances by MediaAmerica to NRCC were supervised by employees and officers of MediaAmerica as those advances were made. This close relationship indicates that NRCC served as an agent of MediaAmerica to enable MediaAmerica to expand its contributor lists, and did so in a manner which would otherwise be prohibited by § 441b.

At the same time as the contributor lists were being expanded, MediaAmerica, through NRCC, was able to recoup its initial investment by soliciting contributions from the general public and to advocate the election of certain clearly identified candidates for federal office. (See attachment 2). A corporation would not be entitled under the FECA to engage in such activities directed towards the public in general. Pipefitters v. United States, 407 U.S. 385 at 431(1972). Instead, such activity would be restricted to the narrow exception provided by Congress in § 441b(b)(4)(A)(i).

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Because certain key principals of MediaAmerica are actively involved in the affairs of the committee and because MediaAmerica has been willing to provide advances for the costs of office space, utilities, equipment, personnel and production services, it appears that MediaAmerica is, in fact, the sponsoring organization of NRCC. If MediaAmerica is to be considered the connected organization of the committee, MediaAmerica violated § 441b(b)(4)(A)(i) by soliciting contributions outside of its permissible class.

The Office of General Counsel recommends, therefore, that the Commission find reason to believe (1) that MediaAmerica and NRCC violated 2 U.S.C. §§ 441b(a) and 441b(b)(4)(A)(i) by making communications and soliciting contributions to a separate segregated fund outside of the class permissible for corporate solicitations , (2) that NRCC violated 2 U.S.C. § 433(b)(2) for its failure to indicate MediaAmerica as its connected organization, and (3) that as a separate segregated fund of MediaAmerica, NRCC violated 2 U.S.C. 432(e)(5) for its failure to include within the Committee name the name of the connected organization, MediaAmerica, Inc.

B. Whether NRCC failed to amend its Statement of Organization within 10 days from the date of a change in previously reported information as required by 2 U.S.C. § 433(c)

2 U.S.C. §433(c) requires a committee to submit an amended Statement of Organization within 10 days from the date of a change in information previously reported.

On February 25, 1981, NRCC submitted an amended Statement of Organization which indicated a change in the offices of committee treasurer and accountant. The amendment was back-dated to July 23, 1980 but signed on February 25, 1981. Reports filed subsequent to July 23, 1981 were signed by the newly designated treasurer, Romanin, evidencing Romanin's role as treasurer during the period in which the treasurer of record was Dent.

The Office of General Counsel accordingly recommends that the Commission find reason to believe that NRCC violated 2 U.S.C. § 433(c) for its failure to amend its Statement of Organization within 10 days from the date of a change in the office of committee treasurer.

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C. Whether NRCC violated 2 U.S.C. § 441d(a)

2 U.S.C. § 441d(a) and 11 C.F.R. § 110.11(a)(1) require a committee to state on any solicitation of the general public who paid for the solicitation and, if the solicitation is on behalf of a candidate who has not authorized it, that the communication is not so authorized. The Commission has indicated, however, that the requirement of § 441d(a) and § 110.11 (a)(1) does not apply to solicitations by separate segregated funds under 2 U.S.C. § 441b since such solicitations are required to be restricted to a specified class. See Advisory Opinion 1980-71.

In the present set of circumstances, the General Counsel views the solicitation by NRCC as that of a separate segregated fund. Thus, even though the solicitation went beyond the permissible class in apparent violation of § 441b(a) and (b)(4)(A)(i), it would not have required the disclaimer required by § 441d(a) and § 110.11(a)(1). Accordingly, the General Counsel recommends that the Commission find no reason to believe that NRCC violated 2 U.S.C. § 441d(a) or § 110.11(a)(1) by failing to provide the specified notice on the solicitation. While it is arguable that the committee did violate 2 U.S.C. § 441b(b)(3)(C) and 11 C.F.R. § 114.5(a)(4) and (5) by failing to include in the solicitation notice of the right to refuse to contribute, the General Counsel withholds making any such recommendation at this time. This is a specific allegation not raised by the complainant, and the General Counsel believes it advisable to gather information regarding the status of NRCC as a separate segregated fund before pursuing this additional possible violation.

D. Whether Dent Violated 2 U.S.C. § 433(b)(2) and § 434(a)(1)

While Dent appears to have been the treasurer of the committee and may have been involved in the Committee's failure to report MediaAmerica as a connected organization, the General Counsel does not recommend a separate reason to believe finding with regard to her under 2 U.S.C. § 433(b)(2). We have already recommended reason to believe against the committee itself, and the statute involved speaks only of the obligation of the committee, not the treasurer. Compare 2 U.S.C. § 434(a)(1).

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As to the allegation that Dent failed to sign reports and statements submitted by the Committee, a review of the Committee records indicates submission of an amended Statement of Organization signed on February 25, 1981, which was back-dated to July 23, 1980 to indicate a change in the office of treasurer to Romanin and to S. King as custodian of books. See Attachment 2, page 14. Other than the Statement of Organization (dated June 30, 1980) which was signed by Dent, no other report was submitted until after the effective date of the amended Statement of Organization received at the Commission on February 26, 1981.

Although Dent appeared as treasurer of record it appears that she did not serve in that position after July 23, 1980 (as evidenced by the back-dated amendment to the Statement of Organization). The Office of General Counsel recommends, therefore, that the Commission not find reason to believe that Dent violated 2 U.S.C. § 433(b)(2) or § 434(a)(1).

E. Whether Geske violated 2 U.S.C. § 441b(a)

2 U.S.C. § 441b(a) makes it unlawful for any officer or director of any corporation to consent to the making of any contribution or expenditure by the corporation.

From the foregoing, it appears that MediaAmerica, as the connected organization of NRCC, violated 2 U.S.C. § 441b(b)(4)(A)(i). By soliciting contributions, 2 U.S.C. § 441b(b)(4)(A)(i), and making communications, 2 U.S.C. § 441b(b)(2)(A), outside the permissible class defined by the Act for a separate segregated fund established by a corporation, MediaAmerica went beyond the narrowly defined exception to the definition of contribution or expenditure established by § 441b(b)(2).

Whether Geske or any other officer or director of MediaAmerica violated § 441b(a) depends upon that person's involvement in the corporate decision-making process. The Office of General Counsel, therefore, withholds its recommendation regarding a possible violation of 2 U.S.C. § 441b(a) by any officer or director of MediaAmerica until additional evidence is obtained to enable this Office to make an appropriate recommendation.

F. Whether Romanin violated 18 U.S.C. § 1001 or 2 U.S.C. § 433(b)(2)

Complainants allege that Romanin violated 18 U.S.C. § 1001 by signing reports as treasurer of the committee while not, in fact, treasurer. The committee's amended Statement of Organization back-dated to July 23, 1980 [as submitted in February, 1981] named Romanin as committee treasurer. All reports signed by Romanin were filed subsequent to

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July 23, 1980, i.e. during the time when he apparently was in fact treasurer. The Commission does not have jurisdiction over possible violations of 18 U.S.C. § 1001, as this is a criminal provision. Because this matter essentially involves only the late filing of the amended Statement of Organization by NRCC, there is no basis, in the General Counsel's view, for recommending that the matter be referred to the Justice Department for a possible violation of 18 U.S.C. § 1001.

For the same reason that no recommendation against Dent was made, the General Counsel makes no separate reason to believe recommendation against Romanin under 2 U.S.C. § 433(b)(2). The committee itself appears to be the proper respondent.

G. Whether violations by respondents were knowing and willful

Although the complainants asserted that the violations alleged were knowing and willful, the General Counsel does not recommend making such a determination at this time. The evidence would more clearly have to demonstrate that respondents MediaAmerica, NRCC, and their officers and directors knew of the potential legal problems and consciously disregarded them.

RECOMMENDATIONS

1. Find reason to believe that:

   a. MediaAmerica violated 2 U.S.C. §§ 441b(a) and 441b(b)(4)(A)(i);

   b. NRCC violated 2 U.S.C. §§ 432(e)(5), 433(c), 433(b)(2) 441b(a), and 441b(b)(4)(A)(i).

2. Find no reason to believe that:

   a. NRCC violated 2 U.S.C. § 441d(a) or 11 C.F.R. § 110.11(a)(1)

   b. Karen E. Dent violated 2 U.S.C. §§ 433(b)(2) or 434(a)(1);

   c. John D. Romanin violated 2 U.S.C. § 433(b)(2).

3. Defer findings of reason to believe that Richard Geske or other officers and directors of MediaAmerica violated 2 U.S.C. § 441b(a) or that violations of the Act by respondents were knowing or willful until further evidence may be analyzed.

Attachments
1. Complaint
2. Response to initial notification
3. Letters to respondents (2)

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ATTACHMENT 1 - Complaint

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January 15, 1981

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

Dear Mr. Steele:

Enclosed is a signed and sworn to complaint filed by the undersigned against the National Republican Candidates Committee, MediAmerica, Inc., K. E. Dent, Richard Geske and John D. Romanin. Please process this complaint promptly pursuant to 11 C.F.R. §111.5.

Donald L. Ivers
House Counsel
Republican National Committee
310 First Street, S. E.
Washington, D. C. 20003

Mark E. Goldhaber
Assistant Legal Counsel
National Republican Congressional Committee
320 First Street, S. E.
Washington, D. C. 20003

James F. Schoener
Legal Counsel
National Republican Senatorial Committee
227 Massachusetts Avenue, N.E.
Washington, D. C. 20002

Att. 1, p. 1

BEFORE THE FEDERAL ELECTION COMMISSION
UNITED STATES OF AMERICA

| | |
|---|---|
| In Re NATIONAL REPUBLICAN CANDIDATES COMMITTEE, K.E. DENT, MEDIAMERICA, INC., RICHARD GESKE, and JOHN D. ROMANIN | Matter Under Review ____ |

COMPLAINT

1. The undersigned hereby file and verify the instant complaint against:

(a) the National Republican Candidates Committee ("Committee"), a political committee registered with the Federal Election Commission ("FEC");

(b) K.E. Dent ("Dent"), treasurer of the Committee;

(c) MediAmerica, Inc. ("MediAmerica"), a Virginia corporation;

(d) Richard Geske ("Geske"), chairman of the Committee and president of MediAmerica;

(e) John D. Romanin ("Romanin"), treasurer of MediAmerica and an officer of the Committee.

2. The business address of the above-mentioned persons is 1900 North Beauregard Street, Suite 12, Alexandria, Virginia 22311.

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3. Complainants aver that the Committee is not a national Republican party committee nor is it affiliated with any national Republican party committee.

4. Upon information and belief, the Committee is not an independent political committee but a separate, segregated fund established and administered by MediAmerica, 2 U.S.C. §441b(b)(2)(C). MediAmerica is the connected organization of the Committee because it directly or indirectly established, and presently administers and financially supports, the Committee. 11 C.F.R. §100.6.

5. The Committee is not an independent committee but a separate, segregated fund of its connected organization MediAmerica for the following reasons [see Advisory Opinions 1975-143 and 1977-2]:

(a) Upon information and belief, the Committee and MediAmerica are controlled by the same individuals, namely Geske and Romanin. See Exhibits 1-3.

(b) The facilities of MediAmerica are used by the Committee. See Exhibits 2-5.

(c) The activities of the Committee have been subsidized almost totally by MediAmerica. See Exhibit 3.

(d) The telephone response number listed in a solicitation for contributions mailed to potential contributors by the Committee is the tele-

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phone number of MediAmerica. See Exhibit 5.

(e) A report filed with the Federal Election Commission by the Committee is written on MediAmerica stationery and signed by Shirley King, an accountant/office manager of MediAmerica. See Exhibit 6.

## COUNT I

### Violations of the Federal Election Laws by the Committee

6. The Committee in its statement of organization failed to list MediAmerica as its connected organization in violation of 2 U.S.C. §433(b)(2). See Exhibit 4.

7. The Committee failed to include in its name the name of MediAmerica, its connected organization, in violation of 2 U.S.C. §432(e)(5). See Exhibit 4.

8. Upon information and belief, the Committee solicited contributions from individuals other than executive or administrative personnel and their families or shareholders and their families of MediAmerica in violation of 2 U.S.C. §441b(b)(4)(i). See Exhibit 5.

9. The Committee filed reports with the FEC which were signed by an individual other than the Committee's treasurer, Dent, in violation of 2 U.S.C. §434(a)(1). See Exhibits 2-3, 6.

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10. Upon information and belief, the Committee failed to state on a written communication soliciting contributions the identity of the person who paid for the communication and that the communication was not authorized by any candidate or candidate's committee in violation of 2 U.S.C. §441d(a)(3). See Exhibit 5.

COUNT 2

Violations of the Federal Election Laws by Dent

11. Dent failed to sign reports filed by the Committee with the FEC in violation of 2 U.S.C. §434(a)(1). See Exhibits 2-3, 6.

12. Dent, on behalf of the Committee, failed to file with the FEC a statement of organization listing MediAmerica as the Committee's connected organization in violation of 2 U.S.C. §433(b)(2). See Exhibit 4.

COUNT 3

Violations of the Federal Election Laws by MediAmerica

13. If MediAmerica is not the connected organization of the Committee, then upon information and belief MediAmerica financed the activities of the Committee by means of subsidizing the Committee's overhead and clerical expenses and extending credit for the rental of mailing lists in violation of 2 U.S.C. §441b(a). See Exhibit 3.

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COUNT 4

Violations of the Federal Election Laws by Geske

14. If MediAmerica is not the connected organization of the Committee, then upon information and belief Geske, an officer and director of MediAmerica, consented to the financing by MediAmerica of the activities of the Committee by means of subsidizing the Committee's overhead and clerical expenses and extending credit for the rental of mailing lists in violation of 2 U.S.C. §441b(a). See Exhibits 1, 3.

COUNT 5

Violations of the Federal Election Laws by Romanin

15. If Romanin is not the treasurer of the Committee, he signed and submitted to the FEC the Committee's October 15 Quarterly Report and Post-Election Report falsely stating that he is the treasurer in violation of 18 U.S.C. §1001. See Exhibits 2-3.

16. If Romanin is the treasurer of the Committee, he failed to amend the Committee's statement of organization to reflect the fact that he, and not Dent, is the treasurer of the Committee in violation of 2 U.S.C. §433(c). See Exhibits 2-4.

17. If Romanin is the treasurer of the Committee, he failed to report on the Committee's statement of organization that MediAmerica is the Committee's connected organization in violation of 2 U.S.C. §433(b)(2). See Exhibit 4.

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**COUNT 6**

**Knowing and Willful Violations of the Federal Election Laws by the Committee, Dent, MediAmerica, Geske and Romanin**

18. Upon information and belief the above-mentioned actions by the Committee, Dent, MediAmerica, Geske and Romanin constitute knowing and willful violations of the federal election laws requiring an immediate referral of such violations by the FEC to the Attorney General of the United States pursuant to 2 U.S.C. §437g(a)(5)(c).

Donald L. Ivers
House Counsel
Republican National Committee
310 First Street, S.E.
Washington, D. C. 20003

Subscribed and sworn to before me this 15th day of January, 1981.

Notary Public

My Commission Expires August 31, 1985

Mark E. Goldhaber
Assistant Legal Counsel
National Republican Congressional Committee
320 First Street, S. E.
Washington, D. C. 20003

8304043556

Att. 1, p.7

Subscribed and sworn to before me this 15th day of January, 1981.

Notary Public

My Commission Expires August 31, 1985

James A. Schoener
Legal Counsel
National Republican Senatorial Committee
227 Massachusetts Avenue, N.E.
Washington, D.C. 20002

Subscribed and sworn to before me this 15th day of January, 1981.

Notary Public

My Commission Expires August 31, 1985

8304043556

EXHIBIT I

AFFIDAVIT

OF

B. MARK BRADEN

I, B. Mark Braden, Deputy House Counsel for the Republican National Committee, do hereby on oath, depose and state as follows:

1. Upon information and belief MEDIAMERICA, INC. is a Virginia corporation, incorporated 4/21/78, Charter #184302. Its stated purpose for advertising and public relations.

2. Upon information and belief J. Curtis Herge is the incorporator. The Directors are listed as: Dennis M. Davis, III; Michael D. Hughes: and J. Curtis Herge.

3. Upon information and belief Virginia State Corporation records also show current officers as follows:

1) D. Richard Geske, President and Director
2) Maiselle Shortley, Vice President and Director
3) Rhonda K. Stahlman, Secretary
4) Terry Lenehan, Assistant Secretary
5) John D. Romanin, Treasurer

B. Mark Braden
Republican National Committee
310 First Street, SE
Washington, DC 20003

District of Columbia:

Subscribed and sworn to before me this 15th day of Jan, 1981.

Philip A. Guarino
Notary Public

My commission expires: MY COMMISSION EXPIRES JUNE 15, 1981

Att. 1, p.9

RECEIVED

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

Summary Page

80 DEC 8 [illegible] 2 P

1. Name of Committee (in Full)

NATIONAL REPUBLICAN CANDIDATES COMMITTEE

Address (Number and Street)

1900 N. Beauregard Street #12

City, State and ZIP Code

Alexandria, Virginia 22311

☐ Check if address is different than previously reported.

2. FEC Identification Number

C00130682

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a)
- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☒ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Monthly Report for _____
- ☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
- ☐ Thirtieth day report following the General Election on _____ in the State of _____
- ☐ Termination Report

(b) Is this Report an Amendment? ☐ YES ☐ NO

| SUMMARY | Column A This Period | Column B Calendar Year-to-Date |
|---|---|---|
| 5. Covering Period 7-1-80 Through 9-30-80 | | |
| 6. (a) Cash on Hand January 1, 19__ N/A | | $ |
| (b) Cash on Hand at Beginning of Reporting Period | $ N/A | |
| (c) Total Receipts (from Line 18) | $ 300.00 | $ |
| (d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B) | $ 300.00 | $ 300.00 |
| 7. Total Disbursements (from Line 28) | $ — | $ — |
| 8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) | $ 300.00 | $ 300.00 |
| 9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D) | $ — | |
| 10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D) | $ — | |

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

John D. Romaglio
Typed or Print Name of Treasurer

Signature of Treasurer — Date 12-1-80

For further information, contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

FEC FORM 3X (3/80)

Att. 1, p. 10

EXHIBIT 2

# DETAILED SUMMARY PAGE
## of Receipts and Disbursements
## (Page 2, FEC FORM 3X)

Name of Committee (In Full): NATIONAL REPUBLICAN CANDIDATES COMMITTEE

Report Covering the Period: From 7-1-80 Thru 9-30-80

| | COLUMN A Total This Period | COLUMN B Calendar Year-to-Date |
|---|---|---|
| **I. RECEIPTS** | | |
| 11. CONTRIBUTIONS (other than loans) FROM: | | |
| (a) Individuals/Persons Other Than Political Committees | 300.00 | 300.00 |
| (Aggregate Every Individual $ _____) | | |
| (b) Political Party Committees | — | — |
| (c) Other Political Committees | — | — |
| (d) TOTAL CONTRIBUTIONS (other than loans)(Add 11a, 11b and 11c) | 300.00 | 300.00 |
| 12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES | — | — |
| 13. ALL LOANS RECEIVED | — | — |
| 14. LOAN REPAYMENTS RECEIVED | — | — |
| 15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.) | — | — |
| 16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES | — | — |
| 17. OTHER RECEIPTS (Dividends, Interest, etc.) | — | — |
| 18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17) | 300.00 | 300.00 |
| **II. DISBURSEMENTS** | | |
| 19. OPERATING EXPENDITURES | — | — |
| 20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES | — | — |
| 21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES | — | — |
| 22. INDEPENDENT EXPENDITURES (Use Schedule E) | — | — |
| 23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F) | — | — |
| 24. LOAN REPAYMENTS MADE | — | — |
| 25. LOANS MADE | — | — |
| 26. REFUNDS OF CONTRIBUTIONS TO: | | |
| (a) Individuals/Persons Other Than Political Committees | — | — |
| (b) Political Party Committees | — | — |
| (c) Other Political Committees | — | — |
| (d) TOTAL CONTRIBUTION REFUNDS (Add 26a, 26b and 26c) | — | — |
| 27. OTHER DISBURSEMENTS | — | — |
| 28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27) | — | — |
| **III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES** | | |
| 29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d | 300.00 | 300.00 |
| 30. TOTAL CONTRIBUTION REFUNDS from Line 26d | — | — |
| 31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29) | 300.00 | 300.00 |
| 32. TOTAL OPERATING EXPENDITURES from Line 19 | — | — |
| 33. OFFSETS TO OPERATING EXPENDITURES from Line 15 | — | — |
| 34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32) | — | — |

AH. 1, p11

# REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

**Summary Page**

1. Name of Committee (In Full)

NATIONAL REPUBLICAN CANDIDATES COMMITTEE

Address (Number and Street)

1900 N. Beauregard Street #12

City, State and ZIP Code

Alexandria, Virginia 22311

☐ Check if address is different than previously reported.

2. FEC Identification Number
C00130682

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate block)

(a)
- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Monthly Report for _____
- ☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
- ☐ Thirtieth day report following the General Election on _____ in the State of _____
- ☐ Termination Report

(b) Is this Report an Amendment? ☐ YES ☒ NO

| SUMMARY | Column A This Period | Column B Calendar Year-to-Date |
|---|---|---|
| 5. Covering Period 10-1-80 Through 11-24-80 | | |
| 6. (a) Cash on Hand January 1, 19__ | | $ 300.00 |
| (b) Cash on Hand at Beginning of Reporting Period | $ 300.00 | |
| (c) Total Receipts (from Line 16) | $ 9813.00 | $ 9813.00 |
| (d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B) | $10,113.50 | $10,113.50 |
| 7. Total Disbursements (from Line 28) | $ 106.31 | $ 106.31 |
| 8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) | $10,007.19 | $10,007.19 |
| 9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D) | $ — | |
| 10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D) | $ 9,305.92 | |

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

John [illegible]
Type or Print Name & Title

[signature]
Signature of Treasurer

12/3/80
Date

For further information, contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | | | | | | | |

FEC FORM 3X (5/80)

Att. 1, p 12 EXHIBIT 3

# DETAILED SUMMARY PAGE
## of Receipts and Disbursements
## (Page 2, FEC FORM 3X)

Name of Committee (In Full): NATIONAL REPUBLICAN [illegible] COMMITTEE

Report Covering the Period: From 10-1-80 To 11-24-80

| | BALANCE AT BEGINNING OF PERIOD | BALANCE AT CLOSE OF PERIOD |
|---|---|---|
| **II. RECEIPTS** | | |
| 11. CONTRIBUTIONS (other than loans) PERSONS WERE ASKED TO DELIVER IT [illegible] CHECK WERE [illegible] | | |
| (a) Individuals/Persons Other Than Political Committees | 9813.50 | 10113.50 |
| (Memo Entry Unitemized $ _____) | — | — |
| (b) Political Party Committees | — | — |
| (c) Other Political Committees | — | — |
| (d) TOTAL CONTRIBUTIONS (other than loans)(Add 11a, 11b and 11d) | 9813.50 | 10113.50 |
| 12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES | — | — |
| 13. ALL LOANS RECEIVED | — | — |
| 14. LOAN REPAYMENTS RECEIVED | — | — |
| 15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.) | — | — |
| 16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES | — | — |
| 17. OTHER RECEIPTS (Dividends, Interest, etc.) | — | — |
| 18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17) | 9813.50 | 10113.50 |
| **III. DISBURSEMENTS** | | |
| 19. OPERATING EXPENDITURES | 106.31 | 106.31 |
| 20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES | — | — |
| 21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES | — | — |
| 22. INDEPENDENT EXPENDITURES (Use Schedule E) | — | — |
| 23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F) | — | — |
| 24. LOAN REPAYMENTS MADE | — | — |
| 25. LOANS MADE | — | — |
| 26. REFUNDS OF CONTRIBUTIONS TO: | | |
| (a) Individuals/Persons Other Than Political Committees | — | — |
| (b) Political Party Committees | — | — |
| (c) Other Political Committees | — | — |
| (d) TOTAL CONTRIBUTION REFUNDS (Add 26a, 26b and 26d) | | |
| 27. OTHER DISBURSEMENTS | — | — |
| 28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27) | 106.31 | 106.31 |
| **IV. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES** | | |
| 29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d | 9813.50 | 10113.50 |
| 30. TOTAL CONTRIBUTION REFUNDS from Line 26d | — | — |
| 31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29) | 9813.50 | 10113.50 |
| 32. TOTAL OPERATING EXPENDITURES from Line 19 | 106.31 | 106.31 |
| 33. OFFSETS TO OPERATING EXPENDITURES from Line 15 | — | — |
| 34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32) | 106.31 | 106.31 |

Att. 1, p13

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page ___ of ___ for Line Number ___
(Use separate schedule(s) for each category of the Detailed Summary Page)

Any information copied from Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit such contributions from such committee.

Name of Committee (In Full) [illegible]

| A. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement This Pe |
|---|---|---|---|
| United Virginia Bank<br>[illegible]<br>Alexandria, VA 22313 | Check-Bank Charge<br>Disbursement for: ☐ Primary ☐ General<br>☐ Other (specify): | 10-27-80<br>10-28-80<br>11-24-80 | 103.54<br>2.42<br>.35 |
| B. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General<br>☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Pe |
| C. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General<br>☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Pe |
| D. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General<br>☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Pe |
| E. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General<br>☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Pe |
| F. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General<br>☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Pe |

Att. 1 p14

SCHEDULE D
(Revised 3/89)

**DEBTS AND OBLIGATIONS**
Excluding Loans

| Name of Committee (In Full) | Beginning Balance This Period | Amount Incurred This Period | Payment This Period | Outstanding Balance End of This Period |
|---|---|---|---|---|
| A. Full Name, Mailing Address and Zip Code of Creditor<br>MEDIAMERICA<br>1900 E. Beauregard St. Suite #12<br>Alexandria, VA 22311 | | 9305.92 | | 9305.92 |
| Nature of Debt (Purpose): Mailing Service List/ Rental-Account Payable | | | | |
| B. Full Name, Mailing Address and Zip Code of Debtor or Creditor<br>MEDIAMERICA<br>1900 E. Beauregard St. Suite #12<br>Alexandria, VA 22311 | | 1000.00 | — | 1000.00 |
| Nature of Debt (Purpose): Office Expense-Temporary Help | | | | |
| C. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |
| D. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |
| E. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |
| F. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |

| | |
|---|---|
| 1) SUBTOTALS This Period This Page (optional) | |
| 2) TOTAL This Period (last page this line only) | 9305.92 |
| 3) TOTAL OUTSTANDING LOANS from Schedule C (last page only) | |
| 4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only) | 9305.92 |

Att. 1, p.15

RECEIVED

# STATEMENT OF ORGANIZATION

(see reverse side for instructions)

1. (a) Name of Committee (in Full) ☐ Check if name or address is changed.
NATIONAL REPUBLICAN CANDIDATES COMMITTEE

(b) Address (Number and Street)
1900 N. BEAUREGARD STREET, # 12, Bldg. 5

(c) City, State and ZIP Code
ALEXANDRIA, VIRGINIA 22311

2. Date
JUNE 30, 1980

3. FEC Identification Number

4. Is this an amended Statement? ☐ YES ☒ NO

5. TYPE OF COMMITTEE (check one):

☐ (a) This committee is a principal campaign committee. (Complete the candidate information below.)

☐ (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

| Name of Candidate | Candidate Party Affiliation | Office Sought | State/District |
|---|---|---|---|
| | | | |

☐ (c) This committee supports/opposes only one candidate _____ (name of candidate) and is NOT an authorized committee.

☐ (d) This committee is a _____ (National, State or subordinate) committee of the _____ (Democratic, Republican, etc.) Party.

☐ (e) This committee is a separate segregated fund.

☒ (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

6.

| Name of Any Connected Organization or Affiliated Committee | Mailing Address and ZIP Code | Relationship |
|---|---|---|
| NONE | | |

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

☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization ☐ Membership Organization ☐ Trade Association ☐ Cooperative

7. Custodian of Records: Identify by name, address (phone number – optional) and position, the person in possession of committee books and records.

| Full Name | Mailing Address and ZIP Code | Title or Position |
|---|---|---|
| K.E. DENT | 1900 N. Beauregard St., # 12, Bldg. 5<br>Alexandria, Virginia 22311 | Treasurer |

8. Treasurer: List the name and address (phone number – optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

| Full Name | Mailing Address and ZIP Code | Title or Position |
|---|---|---|
| K.E. Dent | 1900 N. Beauregard St., #12, Bldg. 5<br>Alexandria, Virginia 22311 | Treasurer |

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

| Name of Bank, Depository, etc. | Mailing Address and ZIP Code |
|---|---|
| UNITED VIRGINIA BANK | 1460 North Beauregard Street<br>Alexandria, Virginia 22311 |

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

K.E. Dent
Type or Print Name of Treasurer

SIGNATURE OF TREASURER

June 30, 1980
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.

For further information contact: Federal Election Commission, Toll Free 800-424-9530, Local 202 523-4068

FEC FORM 1 (3/80)

Att. 1, p16

EXHIBIT 4

FEC 158 | 4157

##### 4-0]2453 J 234]J2 12/5/80 SIC S FSCFI
1 7039980334 UGM TDMA ALEXANDRIA VA 12/5 0900 EST

THE FOLLOWING MESSAGE IS TRANSMITTED FROM: NATIONAL REPUBLICAN CANDIDATE'S COMMITTEE..... JOHN D. ROMANIN.....NATIONAL FINANCE CHAIRMAN..... 0900 EST 12/5

ON BEHALF OF PRESIDENT-ELECT RONALD REAGAN AND MYSELF, THANK YOU! ..... , MAKE NO MISTAKE ABOUT IT..... RONALD REAGAN IS PRESIDEN BECAUSE OF YOUR BELIEF IN THE MAN AND THE PRINCIPLES HE REPRESENTS AND BECAUSE OF YOUR ENDURING SUPPORT.....I ALSO WANT TO EXTEND MY PERSONAL GRATITUDE TO YOU FOR HELPING ELECT A REPUBLICAN MAJORITY TO THE U. S. SENATE..... IT'S THE FIRST TIME IN OVER 26 YEARS REPUBLICANS HAVE CONTROLLED THE "UPPER CHAMBER"..... THIS VICTORY IS EVEN MORE GRATIFYING BECAUSE MANY GOOD CONSERVATIVES LIKE SENATORS THURMOND, HATCH AND GARN WILL BECOME CHAIRMEN OF VERY POWERFUL COMMITTEES..... ADDITIONALLY, OUT-STANDING CANDIDATES LIKE STEVE SYMMS FROM IDAHO AND PAULA HAWKINS FROM FLORIDA WILL GREATLY INCREASE OUR STRENGTH IN THE SENATE..... NONE OF THESE GAINS COULD HAVE BEEN POSSIBLE WITHOUT YOUR PERSONAL COMMITMENT... BUT NOW I MUST TURN MY ATTENTION TO HELPING THESE NEWLY ELECTED "REAGAN" SENATORS AND CONGRESSMEN..... COMBINED, THEY HAVE CAMPAIGN DEBTS TOTALI $1.2 MILLION...THEY REALLY DESERVE HELP...MANY CAMPAIGNED 16-18 HOURS A DAY FOR MONTHS BEFORE THE ELECTION SO AS NOT TO LET US DOWN..... AND IN THE RACES THAT WERE TOO CLOSE TO CALL, I URGED EACH CANDIDATE TO SPEND MINIMUM OF $50,000 ON LAST MINUTE TV AND RADIO ADVERTISEMENTS WITH MY PROMISE TO HELP THEM AFTER THE ELECTIONS..... I KNEW THAT IN A CLOSE RA HEAVY TV AND RADIO SATURATION WOULD PUSH THEM OVER THE TOP..... MY STRATEGY WORKED BUT CAMPAIGNS HAD TO GO INTO DEBT..... WITH MASSIVE DEB NOW HANGING OVER THEIR HEADS THEY CAN'T CONCENTRATE ON THEIR WORK..... MORE IMPORTANTLY, NEW CONSERVATIVES WITH LARGE DEBTS BECOME A PRIME TARGET OF WEALTHY LIBERALS AND POWERFUL LABOR UNIONS WHO HAVE SWORN "TO GET EVEN"..... PLEASE HELP ME KEEP MY PROMISE TO HELP THESE GOOD CONSERVATIVES PAY OFF THEIR DEBTS..... , WON'T YOU SEND THE NAT. REP. CANDIDATE'S COMM. $50 OR PERHAPS $100 OR MORE SO THAT I DON' TO BREAK MY PROMISES TO THEM..... I APOLOGIZE FOR NOT CONSULTING WITH BEFORE ADVISING OUR CANDIDATES TO GO INTO DEBT IN ORDER TO WIN, BUT THERE WASN'T ANY TIME TO CONTACT YOU IN THE REMAINING DAYS OF THE ELEC I HOPE YOU'LL FORGIVE ME AND HELP THE COMMITTEE NOW BY SENDING AS GENE A CONTRIBUTION AS POSSIBLE..... GOD BLESS.....

0900 P EST JOHN. D. ROMANIN..... NATIONAL FINANCE CHAIRMAN

****** PLEASE REFOLD ENTIRE URGENTGRAM AND RETURN WITH CHECK IN ENCLOSED ENVELOPE - MAKE CHECK PAYABLE TO NATIONAL REPUBLICAN CANDIDATE'S COMMITTEE.******

TO REPLY BY URGENTGRAM, CALL URGENTGRAM AT (703) 998-0338

Att. 1, p17

EXHIBIT 5

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

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

October 22, 1980

Attn: Mark Keinman

For the period October 1 thru 15th we have had no Federal Activity.

(NATIONAL REPUBLICANS CANDIDATES COMMITTEE Fec. #00130683)

Sincerely,

Shirley King

Shirley King,
Accountant/Office Mang.

SK/bw

FEC 1731 1489

Att. 1, p.18

EXHIBIT 6

MEDIAMERICA

Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

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

Att. 1, p 20

ATTACHMENT 2 - Response to Complaint

8 3 0 4 0 4 3 5 5 7 7

SEDAM & HERGE
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
7600 OLD SPRINGHOUSE ROAD
McLEAN, VIRGINIA 22102

(703) 821-1000

GLENN J. SEDAM, JR.
J. CURTIS HERGE

ROBERT R. SPARKS, JR.
MICHAEL D. HUGHES
A. MARK CHRISTOPHER
KAREN LUSSEN BLAIR
JOHN ROBERT CLARK III
J. STANLEY PAYNE, JR.

1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(202) 393-7124
TWX/TELEX: 710-631-0896
CABLE: SEDAMHERGE

FEB 25 P1:05

February 25, 1981

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

Attention: Steve Mims, Esq.

Re: MUR 1363

Dear Mr. Steele:

This letter is written on behalf of our clients, National Republican Candidates' Committee; MediAmerica, Inc.; Mr. John D. Romanin; and, Mr. D. Richard Geske, four of the five respondents named in the complaint filed with the Federal Election Commission by the Republican National Committee, the National Republican Congressional Committee and the National Republican Senatorial Committee, which has been denominated by the Federal Election Commission as MUR 1363.* This firm has not been authorized to appear in this matter by K. E. Dent.

*National Republican Candidates' Committee mailed a letter of representation to the Federal Election Commission on February 4, 1981. Enclosed herewith are letters of representation of MediAmerica, Inc., Mr. John D. Romanin and Mr. D. Richard Geske.



8304043557 3

The respondent, National Republican Candidates' Committee (hereinafter "NRCC"), was organized in accordance with the provisions of the Federal Election Campaign Act of 1971, as amended, when it filed with the Federal Election Commission a Statement of Organization, FEC Form 1, dated June 30, 1980. That Statement of Organization reported that NRCC would support or oppose more than one Federal candidate; that it is not a separate segregated fund or a party committee; that it has no connected organization or affiliated committee; and, that K. [Karen] E. Dent was the treasurer of the committee. Except for its Statement of Organization, as amended, NRCC has no charter or other governing document. The complainants in this matter have alleged, inter alia, that NRCC is the separate segregated fund of MediAmerica, Inc.; that, if NRCC is the separate segregated fund of MediAmerica, Inc., sections of the Act relating to registration, reporting and the solicitation of contributions have been violated; that solicitations failed to identify the person who authorized and paid for the communications; that certain reports of NRCC were not signed by its treasurer; that MediAmerica, Inc., if not the connected organization of NRCC, extended unlawful credit to NRCC; and, that the alleged violations were made in a knowing and willful manner. While certain of the allegations made by complainants are true, and will be admitted herein, we will demonstrate that a number of the allegations are without foundation and should be dismissed.

The genesis of NRCC is that it was eventually organized as a consequence of a conversation between Mr. Geske and Mr. Romanin about the potential impact on Federal

8 3 0 4 0 4 3 5 5 7 9

Att. 2, p2

elections of the so-called Obey-Railsback campaign reform legislation. In the view of Messrs. Geske and Romanin, who happen to be personal friends as well as business colleagues, the Federal Election Campaign Act of 1971 and the Obey-Railsback bill encouraged the organization and operation of multicandidate political committees. It was the specific objective of Messrs. Geske and Romanin to organize a committee that could be operated at a limited cost and that could utilize mass direct-mail solicitation techniques. By reason of the fact that Messrs. Geske and Romanin were associated with MediAmerica, Inc., an advertising firm with experience in commercial direct-mail techniques, it was believed that their objectives could be accomplished by utilizing the resources of MediAmerica, Inc. to produce the direct-mail solicitations; and, to provide office space, equipment and administrative support on a reimbursable basis. These plans were discussed with Karen E. Dent, who, we are advised, agreed to participate as the committee's Treasurer. Mr. Geske assumed the title of Chairman of NRCC and Mr. Romanin assumed the title of National Finance Chairman. It was by coincidence that these three individuals were also employees of MediAmerica, Inc.

Logic dictates that NRCC was not established as the separate segregated fund of MediAmerica, Inc. MediAmerica, Inc. has one individual stockholder and approximately six executive or administrative personnel on its staff. The goals of the organizers of NRCC...to engage MediAmerica, Inc. to produce mass direct-mail solicitations...could not

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have been met if NRCC were the separate segregated fund of MediAmerica, Inc. Furthermore, the decision to establish NRCC was not a corporate decision of MediAmerica, Inc.

Unfortunately, from the time the decision was made by Messrs. Geske, Romanin and Ms. Dent to form NRCC, a combination of events and a lack of understanding of the provisions of the Federal Election Campaign Act of 1971, as amended, culminated in a series of problems for NRCC. The most significant problem was that, on or about July 23, 1980, Karen E. Dent failed to report to work as the bookkeeper and accountant of MediAmerica, Inc. It was learned almost immediately that there were significant and substantial irregularities in the books and accounts of MediAmerica, Inc. We are advised that that discovery led to an investigation by First American Bank of Virginia and by the Arlington and Alexandria police, which resulted in the arrest of Ms. Dent by the Arlington police. The turmoil occasioned by the incident involving Ms. Dent preoccupied Mr. Geske and Mr. Romanin and, as a result, NRCC remained relatively quiescent during the early months of its existence.

Following the departure of Ms. Dent, Mr. Romanin assumed the position of Treasurer of NRCC. Among other things, he took steps to open a bank account for NRCC at United Virginia Bank. A copy of the authorization submitted to United Virginia Bank by NRCC, dated September 23, 1980, is enclosed. It will be noted that Mr. Romanin is described as the Treasurer of NRCC in that authorization. Neither Mr. Geske, Mr. Romanin nor any other person associated with NRCC

8 3 0 4 0 4 3 5 5 3 1

was aware of the requirement that an amended Statement of Organization, FEC Form 1, had to be filed with the Federal Election Commission, recording the designation of Mr. Romanin as the new Treasurer of NRCC. For the record, there is enclosed and filed herewith an amended Statement of Organization of NRCC, FEC Form 1, dated July 23, 1980, reporting Mr. Romanin's designation as Treasurer of the Committee as of that date.*

Another unfortunate incident which befell NRCC was that, when it filed its original Statement of Organization, the Federal Election Commission mistakenly recorded NRCC as a party committee. That act by the Commission, which was clearly in contravention of the terms of NRCC's Statement of Organization, resulted in confusion and it raised the ire of the three national committees of the Republican Party. (See, letter from Chairman Brock to Chairman McGarry, dated January 13, 1981; letter from Chairman McGarry to Chairman Brock, dated January 15, 1981; and, release from the Press Office of the Federal Election Commission, dated January 15, 1981.) The three national committees of the Republican Party, apparently concerned that NRCC was representing itself as a party committee, are the complainants in this matter. NRCC has taken every reasonable step to extricate itself from the confusion caused by the error of the Federal Election Commission in listing it as a party committee. It has filed an amended Statement of Organization, dated January 13, 1981, showing...using phrases and a format recommended by

*NRCC filed with the Federal Election Commission an amended Statement of Organization, FEC Form 1, dated January 13, 1981, reporting that as of that date S. King assumed the position of Treasurer of NRCC.

8 3 0 4 0 4 3 5 5 3 7

the staff of the Commission... that it is not affiliated with the Republican Party. That amendment was followed by a separate letter from NRCC to the Commission, dated January 14, 1981, explaining that it is neither an affiliate, nor a subordinate, of any party committee. To avoid any possibility of further confusion, there is enclosed and filed herewith an amended Statement of Organization of NRCC, dated February 25, 1981, changing the name of the committee to National Candidates Committee.*

Turning now to the reports of receipts and disbursements filed by NRCC, one will note that they were prepared and presented in a manner which clearly evidences a lack of understanding and familiarity, on the part of the individuals associated with the committee, with the provisions of the Act. The original Report of Receipts and Disbursements of NRCC, for the period July 1, 1980 through September 30, 1980, was not filed with the Federal Election Commission until December 8, 1980 and then only after a reminder from the Commission. It was noted by counsel to be deficient in several respects and, for that reason, an amended Report is enclosed and filed herewith.

The original Report of Receipts and Disbursements of NRCC, for the period October 1, 1980 through November 24, 1980, was filed in a timely fashion but, it too, was found deficient. (See lines 4(a), 6(a), 6(c), 11(a) and Schedule D.) For that reason, an amended Report is enclosed and filed herewith.

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*For consistency, the committee shall continue to be referred to as NRCC throughout the balance of this letter.

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The original Report of Receipts and Disbursements of NRCC, for the period November 25, 1980 through December 31, 1980, while timely filed, was also found deficient. (See lines 6(a), 6(c), 6(d), 8, 11(a), 11(d), 18, 29, 31, Schedule B for line 19, Schedule B for line 21 and Schedule D.) For that reason, an amended Report is enclosed and filed herewith.

While the reports filed by NRCC required amendment to comply with the provisions of the Act, the record is, and has been, abundantly clear that MediAmerica, Inc. has not financially supported NRCC, nor has MediAmerica, Inc. extended credit to NRCC in violation of 2 U.S.C. 441b(a). During the period from the date of its organization until her departure, Karen E. Dent spent approximately 1.5 hours of her time obtaining, preparing, typing and filing the original Statement of Organization of NRCC; and, an additional 1.5 hours in making the necessary arrangements to open the checking account of NRCC. Clearly, that time was incidental as defined in 11 CFR 114.9(a). Furthermore, prior to October 1, 1980, the total time expended by MediAmerica, Inc. personnel on NRCC consisted of approximately 40 minutes by S. King in recording and depositing the checks totalling $300.00; and of approximately 20 minutes by Messrs. Geske and Romanin in discussing a budget for NRCC and general administrative matters. Clearly, that time was also incidental as defined in 11 CFR 114.9(a).

administrative costs

In its Post General Election Report, NRCC reported an obligation due MediAmerica, Inc. of $9,305.92, of which

8 3 0 4 3 5 5 8 4

Att. 2, p7

$8,305.92 was for the production and mailing of the first solicitation (see, invoice #758 attached) and $1,000.00 was for administrative and operating costs (see, invoice #772 attached). Of that obligation, NRCC paid MediAmerica, Inc. the sum of $4,500.00 within a commercially reasonable time on December 1, 1980.

In its Year-End Report, NRCC reported that it incurred an additional obligation to MediAmerica, Inc. of $10,608.10, of which $9,543.60 was for the production and mailing of the second solicitation (see, invoice #000010 attached) and $1,064.50 was for administrative and operating costs (see, invoice #776 attached). On December 1, 1980, NRCC paid MediAmerica, Inc. $1,064.50 and, on January 10, 1981, NRCC paid MediAmerica, Inc. an additional $2,000.00. Furthermore, the Year-End Report shows that NRCC paid $275.00 directly to the landlord on December 1, 1980 for rental of the office space it utilizes.

As a consequence, it is evident that NRCC has been billed for, and has paid, its pro-rata expenses for space and equipment rental, supplies and personnel costs. Furthermore, it is evident that MediAmerica, Inc. has rendered invoices for its professional services rendered in producing its direct-mail solicitations; that it was paid $5,500.00 for those services to date; and, that the balance has not been outstanding for a period which is commercially unreasonable in the trade.

Thus, in conclusion, while mistakes were made in the organization and administration of NRCC, one series of

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related allegations made by complainants can not withstand scrutiny. Those are the allegations that MediAmerica, Inc. is the connected organization of NRCC. As noted, Messrs. Geske and Romanin are employees of MediAmerica, Inc. Furthermore, Karen E. Dent was an employee of MediAmerica, Inc. However, NRCC was organized by these individuals in free and common association as individuals, not as employees of MediAmerica, Inc. Their individual goals were achieved by engaging MediAmerica, Inc. to produce its direct-mail solicitations and by meeting its administrative and operating costs on a pro-rata and reasonable basis. All of the costs incurred were accounted for in the original reports filed by NRCC and the credit extended to NRCC for that purpose has not been in violation of 2 U.S.C. 441b(a).

As a consequence of the foregoing and with reference to the specific violations alleged in the complaint, respondents MediAmerica, Inc., NRCC, Geske and Romanin respond as follows:

The paragraphs numbered herein correspond to the paragraph numbers in the complaint.

6. Admit, but deny MediAmerica is the connected organization of NRCC;

7. Admit, but deny MediAmerica is the connected organization of NRCC;

8. Admit that NRCC solicited contributions from individuals other than executive or administrative personnel and their families or shareholders and their families of MediAmerica, but deny that that activity constituted a violation of 2 U.S.C. 441b(b)(4)(i);

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542

Att. 2, p.9

9. Deny, in that Romanin was Treasurer of NRCC from on or about July 23, 1980 until on or about January 13, 1981;

10. Admit;

11. Deny, for the reasons set forth in paragraph 9, above;

12. Admit, but deny MediAmerica is the connected organization NRCC;

13. Admit that MediAmerica is not the connected organization of NRCC, but deny that it extended credit in violation of 2 U.S.C. 441b(a);

14. The response herein is the same as the response in paragraph 13, above;

15. The response herein is the same as the response in paragraph 9, above;

16. Admit;

17. Admit, but deny MediAmerica is the connected organization of NRCC;

18. Deny.

In summary, the Federal Election Commission should find reason to believe that the respondents herein (1) violated 2 U.S.C. 433(c) by failing to amend the statement of organization, as required, to report that Mr. Romanin became Treasurer of NRCC on or about July 23, 1980; and (2) violated 2 U.S.C. 441d(a)(3) by failing to identify on its solicitations the person who authorized and paid for the communications (although it is readily apparent in the text of the solicitation that NRCC was its source). The record is clear, however, that the foregoing violations were not knowing and willful.

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Furthermore, the Commission should take cognizance of the fact that any confusion as to whether NRCC was a party committee was due to the error of its staff in listing it as such. The Commission should, on the other hand and for the reasons stated herein, dismiss the remaining allegations made in the complaint.

Respectfully submitted,

Sincerely yours,

J. Curtis Herge

J. Curtis Herge
Counsel to National Republican Candidates' Committee, MediAmerica, Inc., Mr. John D. Romanin and Mr. D. Richard Geske

enclosures

8304043553

February 25, 1981

To: Federal Election Commission

From: National Republican Candidates' Committee
MediAmerica, Inc.
John D. Romanin
D. Richard Geske

Subject: MUR 1363

This is to certify that the matters of fact set forth in the letter from J. Curtis Herge, Esq. to the General Counsel of the Federal Election Commission relative to MUR 1363, dated February 25, 1981, are to the best of our knowledge true and correct.

National Republican Candidates' Committee

By S. King
S. King, Treasurer

MediAmerica, Inc.

By
President

John D. Romanin

D. Richard Geske

Att. 2, p 12

8 3 0 4 0 4 3 5 5 3 3

# Authority of Lodge, Association or Other Similar Organization to Open Deposit Account

To United Virginia Bank
NAME OF BANK

1406 Beauregard, Alexandria VA. 22311
ADDRESS

Date 9/23/80

At a regular meeting of the Board of Directors

of the National Republicans Candidates Committee

held on the 18th day of August 1980 at which a quorum was present, the following officers were duly elected for the ensuing year and until their successors shall be elected and shall have qualified:

| Name | Title | Specimen Signature |
|---|---|---|
| John D. Romanin | Treasurer/Secretary | |
| D. Richard Geske | Chairman | |
| | | |
| | | |

Under the rules of the

Any funds deposited to its credit with a bank or trust company may be withdrawn by the Treasurer

John D. Romanin (1 signature only)
(Use blank spaces for titles of signing officers and state whether checks will bear one signature or will be signed and countersigned)

who is authorized to endorse and sign Checks, Drafts and Orders for the payment of money.

The authority herein given is to remain irrevocable so far as the above bank is concerned until it be notified in writing of the revocation of such authority and shall in writing acknowledge receipt thereof.

Affix Seal Below

Secretary

Approved:

To be signed by the

signing officers

Att. 2, p. 13

# STATEMENT OF ORGANIZATION

(see reverse side for instructions)

1. (a) Name of Committee (in Full) ☐ Check if name or address is changed.
NATIONAL REPUBLICAN CANDIDATES COMMITTEE

2. Date
July 23, 1980

(b) Address (Number and Street)
1900 N. Beauregard Street, Suite 12

3. FEC Identification Number
C00130682

(c) City, State and ZIP Code
Alexandria, Virginia 22311

4. Is this an amended Statement? ☒ YES ☐ NO

5. TYPE OF COMMITTEE (check one):

☐ (a) This committee is a principal campaign committee. (Complete the candidate information below.)

☐ (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

| Name of Candidate | Candidate Party Affiliation | Office Sought | State/District |
|---|---|---|---|
| | | | |

☐ (c) This committee supports/opposes only one candidate _____ (name of candidate) and is NOT an authorized committee.

☐ (d) This committee is a _____ (National, State or subordinate) committee of the _____ (Democratic, Republican, etc.) Party.

☐ (e) This committee is a separate segregated fund.

☐ (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

6.

| Name of Any Connected Organization or Affiliated Committee | Mailing Address and ZIP Code | Relationship |
|---|---|---|
| | | |

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

☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization ☐ Membership Organization ☐ Trade Association ☐ Cooperative

7. Custodian of Records: Identify by name, address (phone number — optional) and position, the person in possession of committee books and records.

| Full Name | Mailing Address and ZIP Code | Title or Position |
|---|---|---|
| S. King | 1900 N. Beauregard Street, Suite 12<br>Alexandria, Virginia 22311 | Accountant |

8. Treasurer: List the name and address (phone number — optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

| Full Name | Mailing Address and ZIP Code | Title or Position |
|---|---|---|
| John D. Romanin | 1900 N. Beauregard Street, Suite 12<br>Alexandria, Virginia 22311 | Treasurer |

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

| Name of Bank, Depository, etc. | Mailing Address and ZIP Code |
|---|---|
| | |

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

JOHN D. ROMANIN
Type or Print Name of Treasurer

SIGNATURE OF TREASURER

2/25/81
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.

For further information contact: Federal Election Commission, Toll Free 800-424-9530, Local 202-523-4068

FEC FORM 1 (3/80)

Att. 2, p. 14.

# STATEMENT OF ORGANIZATION

(see reverse side for instructions)

1. (a) Name of Committee (in Full) ☒ Check if name or address is changed.
NATIONAL CANDIDATES COMMITTEE*

2. Date
February 25, 1981

(b) Address (Number and Street)
1900 N. Beauregard Street, Suite 12

3. FEC Identification Number
C00130682

(c) City, State and ZIP Code
Alexandria, Virginia 22311

4. Is this an amended Statement? ☒ YES ☐ NO

5. TYPE OF COMMITTEE (check one): *formerly known as: NATIONAL REPUBLICAN CANDIDATES COMMITTEE

☐ (a) This committee is a principal campaign committee. (Complete the candidate information below.)

☐ (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

| Name of Candidate | Candidate Party Affiliation | Office Sought | State/District |
|---|---|---|---|
| | | | |

☐ (c) This committee supports/opposes only one candidate _____ (name of candidate) and is NOT an authorized committee.

☐ (d) This committee is a _____ (National, State or subordinate) committee of the _____ (Democratic, Republican, etc.) Party.

☐ (e) This committee is a separate segregated fund.

☐ (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

| 6. Name of Any Connected Organization or Affiliated Committee | Mailing Address and ZIP Code | Relationship |
|---|---|---|
| | | |

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

☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization ☐ Membership Organization ☐ Trade Association ☐ Cooperative

7. Custodian of Records: Identify by name, address (phone number – optional) and position, the person in possession of committee books and records.

| Full Name | Mailing Address and ZIP Code | Title or Position |
|---|---|---|
| | | |

8. Treasurer: List the name and address (phone number – optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

| Full Name | Mailing Address and ZIP Code | Title or Position |
|---|---|---|
| | | |

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

| Name of Bank, Depository, etc. | Mailing Address and ZIP Code |
|---|---|
| | |

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

S. KING
Type or Print Name of Treasurer

S. King
SIGNATURE OF TREASURER

2/25/81
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.

For further information contact: Federal Election Commission, Toll Free 800-424-9530, Local 202-523-4068

FEC FORM 1 (3/80)

Att. 2, p.15

# REPORT OF RECEIPTS AND DISBURSEMENTS
## For a Political Committee Other Than an Authorized Committee

(Summary Page)

1. Name of Committee (in Full)
NATIONAL REPUBLICAN CANDIDATES COMMITTEE

Address (Number and Street)
1900 N. Beauregard Street, Suite 12

City, State and ZIP Code
Alexandria, Virginia 22311

☐ Check if address is different than previously reported.

2. FEC Identification Number
C00130682

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a)
- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☒ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Monthly Report for _____
- ☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
- ☐ Thirtieth day report following the General Election on _____ in the State of _____
- ☐ Termination Report

(b) Is this Report an Amendment?
☒ YES ☐ NO

| SUMMARY | Column A This Period | Column B Calendar Year-to-Date |
|---|---|---|
| 5. Covering Period 6-30-80 Through 9-30-80 | | |
| 6. (a) Cash on Hand January 1, 1980 | | $ -0- |
| (b) Cash on Hand at Beginning of Reporting Period | $ -0- | |
| (c) Total Receipts (from Line 18) | $ 300.00 | $ 300.00 |
| (d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B) | $ 300.00 | $ 300.00 |
| 7. Total Disbursements (from Line 28) | $ -0- | $ -0- |
| 8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) | $ 300.00 | $ 300.00 |
| 9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D) | $ -0- | |
| 10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D) | $ -0- | |

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

S. KING
Type or Print Name of Treasurer

S. King
SIGNATURE OF TREASURER

2/25/81
Date

For further information, contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | | | | | | | |

FEC FORM 3X (3/80)

Att. 2, p. 16

# DETAILED SUMMARY PAGE
## of Receipts and Disbursements
## (Page 2, FEC FORM 3X)

Name of Committee (in Full)
NATIONAL REPUBLICAN CANDIDATES COMMITTEE

Report Covering the Period: From: 6/30/80 To: 9/30/80

| | COLUMN A Total This Period | COLUMN B Calendar Year-to-Date |
|---|---|---|
| **I. RECEIPTS** | | |
| 11. CONTRIBUTIONS (other than loans) FROM: | | |
| (a) Individuals/Persons Other Than Political Committees | 300.00 | 300.00 |
| (Memo Entry Unitemized $ 300.00 ) | | |
| (b) Political Party Committees | | |
| (c) Other Political Committees | | |
| (d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c) | 300.00 | 300.00 |
| 12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES | | |
| 13. ALL LOANS RECEIVED | | |
| 14. LOAN REPAYMENTS RECEIVED | | |
| 15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.) | | |
| 16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES | | |
| 17. OTHER RECEIPTS (Dividends, Interest, etc.) | | |
| 18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17) | 300.00 | 300.00 |
| **II. DISBURSEMENTS** | | |
| 19. OPERATING EXPENDITURES | | |
| 20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES | | |
| 21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES | | |
| 22. INDEPENDENT EXPENDITURES (Use Schedule E) | | |
| 23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F) | | |
| 24. LOAN REPAYMENTS MADE | | |
| 25. LOANS MADE | | |
| 26. REFUNDS OF CONTRIBUTIONS TO: | | |
| (a) Individuals/Persons Other Than Political Committees | | |
| (b) Political Party Committees | | |
| (c) Other Political Committees | | |
| (d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c) | | |
| 27. OTHER DISBURSEMENTS | | |
| 28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27) | -0- | -0- |
| **III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES** | | |
| 29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d | 300.00 | 300.00 |
| 30. TOTAL CONTRIBUTION REFUNDS from Line 26d | | |
| 31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29) | 300.00 | 300.00 |
| 32. TOTAL OPERATING EXPENDITURES from Line 19 | | |
| 33. OFFSETS TO OPERATING EXPENDITURES from Line 15 | | |
| 34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32) | -0- | -0- |

Att. 2, p.17

# REPORT OF RECEIPTS AND DISBURSEMENTS
## For a Political Committee Other Than an Authorized Committee

(Summary Page)

1. Name of Committee (in Full)
NATIONAL REPUBLICAN CANDIDATES COMMITTEE

Address (Number and Street)
1900 N. Beauregard Street, Suite 12

City, State and ZIP Code
Alexandria, Virginia 22311

☐ Check if address is different than previously reported.

2. FEC Identification Number
C00130682

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a)
- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Monthly Report for _____
- ☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
- ☒ Thirtieth day report following the General Election on 11/4/80 ~~[illegible]~~
- ☐ Termination Report

(b) Is this Report an Amendment? ☒ YES ☐ NO

| SUMMARY | Column A This Period | Column B Calendar Year-to-Date |
|---|---|---|
| 5. Covering Period 10-1-80 Through 11-24-80 | | |
| 6. (a) Cash on Hand January 1, 1980 | | $ -0- |
| (b) Cash on Hand at Beginning of Reporting Period | $ 300.00 | |
| (c) Total Receipts (from Line 18) | $ 9,813.50 | $ 10,113.50 |
| (d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B) | $ 10,113.50 | $ 10,113.50 |
| 7. Total Disbursements (from Line 28) | $ 106.31 | $ 106.31 |
| 8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) | $ 10,007.19 | $ 10,007.19 |
| 9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D) | $ -0- | |
| 10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D) | $ 9,305.92 | |

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

S. KING
Type or Print Name of Treasurer

S. King
SIGNATURE OF TREASURER

2/25/81
Date

For further information, contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | | | | | | | |

FEC FORM 3X (3/80)

Att. 2p.18

# DETAILED SUMMARY PAGE
## of Receipts and Disbursements
## (Page 2, FEC FORM 3X)

Name of Committee (In Full)
NATIONAL REPUBLICAN CANDIDATES COMMITTEE

Report Covering the Period: From: 10/1/80 To: 11/24/80

| | COLUMN A Total This Period | COLUMN B Calendar Year-to-Date |
|---|---|---|
| **I. RECEIPTS** | | |
| 11. CONTRIBUTIONS (other than loans) FROM: | | |
| (a) Individuals/Persons Other Than Political Committees | 9,813.50 | 10,113.50 |
| (Memo Entry Unitemized $ 9,813.50) | | |
| (b) Political Party Committees | | |
| (c) Other Political Committees | | |
| (d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c) | 9,813.50 | 10,113.50 |
| 12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES | | |
| 13. ALL LOANS RECEIVED | | |
| 14. LOAN REPAYMENTS RECEIVED | | |
| 15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.) | | |
| 16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES | | |
| 17. OTHER RECEIPTS (Dividends, Interest, etc.) | | |
| 18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17) | 9,813.50 | 10,113.50 |
| **II. DISBURSEMENTS** | | |
| 19. OPERATING EXPENDITURES | 106.31 | 106.31 |
| 20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES | | |
| 21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES | | |
| 22. INDEPENDENT EXPENDITURES (Use Schedule E) | | |
| 23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F) | | |
| 24. LOAN REPAYMENTS MADE | | |
| 25. LOANS MADE | | |
| 26. REFUNDS OF CONTRIBUTIONS TO: | | |
| (a) Individuals/Persons Other Than Political Committees | | |
| (b) Political Party Committees | | |
| (c) Other Political Committees | | |
| (d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c) | | |
| 27. OTHER DISBURSEMENTS | | |
| 28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27) | 106.31 | 106.31 |
| **III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES** | | |
| 29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d | 9,813.50 | 10,113.50 |
| 30. TOTAL CONTRIBUTION REFUNDS from Line 26d | | |
| 31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29) | 9,813.50 | 10,113.50 |
| 32. TOTAL OPERATING EXPENDITURES from Line 19 | 106.31 | 106.31 |
| 33. OFFSETS TO OPERATING EXPENDITURES from Line 15 | | |
| 34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32) | 106.31 | 106.31 |

Att. 2, p. 19

**SCHEDULE D**
(Revised 3/80)

# DEBTS AND OBLIGATIONS
## Excluding Loans

Page 1 of 1 for
LINE NUMBER 10
(Use separate schedules for each numbered line)

| Name of Committee (in Full) NATIONAL REPUBLICAN CANDIDATES COMMITTEE | Outstanding Balance Beginning This Period | Amount Incurred This Period | Payment This Period | Outstanding Balance at Close of This Period |
|---|---|---|---|---|
| A. Full Name, Mailing Address and Zip Code of Debtor or Creditor<br>MEDIAMERICA<br>1900 N. Beauregard Street<br>Alexandria, Virginia 22311 | -0- | 9,305.92 | -0- | 9,305.92 |
| Nature of Debt (Purpose):<br>See statement attached. | | | | |
| B. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |
| C. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |
| D. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |
| E. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |
| F. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |
| 1) SUBTOTALS This Period This Page (optional) | | | | |
| 2) TOTAL This Period (last page this line only) | | | | 9,305.92 |
| 3) TOTAL OUTSTANDING LOANS from Schedule C (last page only) | | | | |
| 4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only) | | | | 9,305.92 |

83040435597

AM. Q, p. 20

Attachment to Schedule D of Report of
Receipts and Disbursements of
NATIONAL REPUBLICAN CANDIDATES COMMITTEE
For the Period Oct. 1, 1980 through Nov. 24, 1980

Nature of obligation due MediAmerica

| | | |
|---|---|---|
| Production and mailing services for solicitation mailed Oct. 25 and 26, 1980 | | $8,305.92 |
| Reimbursement of: | | |
| General clerical and administrative costs | $442.00 | |
| Accounting costs | 198.00 | |
| Telephone costs | 140.00 | |
| Rental of office equipment | 150.00 | |
| Xerox costs and supplies | 70.00 | 1,000.00 |
| TOTAL | | $9,305.92 |

83040435598

# REPORT OF RECEIPTS AND DISBURSEMENTS
## For a Political Committee Other Than an Authorized Committee

(Summary Page)

1. Name of Committee (in Full)

NATIONAL REPUBLICAN CANDIDATES COMMITTEE

Address (Number and Street)

1900 N. Beauregard Street, Suite 12

City, State and ZIP Code

Alexandria, Virginia 22311

☐ Check if address is different than previously reported.

2. FEC Identification Number

C00130682

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on 12/30/80 (date)

4. TYPE OF REPORT (check appropriate boxes)

(a)
- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☒ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Monthly Report for _____
- ☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
- ☐ Thirtieth day report following the General Election on _____ in the State of _____
- ☐ Termination Report

(b) Is this Report an Amendment? ☒ YES ☐ NO

| SUMMARY | Column A This Period | Column B Calendar Year-to-Date |
|---|---|---|
| 5. Covering Period 11/25/80 Through 12/31/80 | | |
| 6. (a) Cash on Hand January 1, 19 80 | | $ -0- |
| (b) Cash on Hand at Beginning of Reporting Period | $ 10,007.19 | |
| (c) Total Receipts (from Line 18) | $ 6,897.81 | $ 17,011.31 |
| (d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B) | $ 16,905.00 | $ 17,011.31 |
| 7. Total Disbursements (from Line 28) | $ 10,997.21 | $ 11,103.52 |
| 8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) | $ 5,907.79 | $ 5,907.79 |
| 9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D) | $ -0- | |
| 10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D) | $ 14,349.52 | |

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

S. KING
Type or Print Name of Treasurer

S. King
SIGNATURE OF TREASURER

2/25/81
Date

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | | | | | | | |

FEC FORM 3X (3/80)

Att. 2, p.22

# DETAILED SUMMARY PAGE
## of Receipts and Disbursements
## (Page 2, FEC FORM 3X)

Name of Committee (in Full): NATIONAL REPUBLICAN CANDIDATES COMMITTEE

Report Covering the Period: From: 11/25/80 To: 12/31/80

| | COLUMN A Total This Period | COLUMN B Calendar Year-to-Date |
|---|---|---|
| **I. RECEIPTS** | | |
| 11. CONTRIBUTIONS (other than loans) FROM: | | |
| (a) Individuals/Persons Other Than Political Committees (Memo Entry Unitemized $ 6,897.81) | 6,897.81 | 17,011.31 |
| (b) Political Party Committees | | |
| (c) Other Political Committees | | |
| (d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c) | 6,897.81 | 17,011.31 |
| 12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES | | |
| 13. ALL LOANS RECEIVED | | |
| 14. LOAN REPAYMENTS RECEIVED | | |
| 15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.) | | |
| 16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES | | |
| 17. OTHER RECEIPTS (Dividends, Interest, etc.) | | |
| 18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17) | 6,897.81 | 17,011.31 |
| **II. DISBURSEMENTS** | | |
| 19. OPERATING EXPENDITURES | 5,997.21 | 6,103.52 |
| 20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES | | |
| 21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES | 5,000.00 | 5,000.00 |
| 22. INDEPENDENT EXPENDITURES (Use Schedule E) | | |
| 23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F) | | |
| 24. LOAN REPAYMENTS MADE | | |
| 25. LOANS MADE | | |
| 26. REFUNDS OF CONTRIBUTIONS TO: | | |
| (a) Individuals/Persons Other Than Political Committees | | |
| (b) Political Party Committees | | |
| (c) Other Political Committees | | |
| (d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c) | | |
| 27. OTHER DISBURSEMENTS | | |
| 28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27) | 10,997.21 | 11,103.52 |
| **III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES** | | |
| 29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d | 6,897.81 | 17,011.31 |
| 30. TOTAL CONTRIBUTION REFUNDS from Line 26d | | |
| 31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29) | 6,897.81 | 17,011.31 |
| 32. TOTAL OPERATING EXPENDITURES from Line 19 | 5,997.21 | 6,103.52 |
| 33. OFFSETS TO OPERATING EXPENDITURES from Line 15 | | |
| 34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32) | 5,997.21 | 6,103.52 |

9 3 0 4 0 4 3 5 6 0 0

Att. 2, p. 23

SCHEDULE B

# ITEMIZED DISBURSEMENTS

Page 1 of 1 for
LINE NUMBER 19
(Use separate schedule(s) for each category of the Detailed Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (In Full)
NATIONAL REPUBLICAN CANDIDATES COMMITTEE

| | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement This Period |
|---|---|---|---|
| A. Full Name, Mailing Address and ZIP Code<br>Mark Winkler Management Co.<br>1900 N. Beauregard Street<br>Alexandria, Va. 22311 | Rental of office space<br>Disbursement for: ☐ Primary ☐ General ☒ Other (specify): 1980 | 12/01/80 | 275.00 |
| B. Full Name, Mailing Address and ZIP Code<br>MediAmerica<br>1900 N. Beauregard Street<br>Alexandria, Va. 22311 | Payment of account payable<br>Disbursement for: ☐ Primary ☐ General ☒ Other (specify): 1980 | 12/01/80 | 4,500.00 |
| C. Full Name, Mailing Address and ZIP Code<br>MediAmerica<br>1900 N. Beauregard Street<br>Alexandria, Va. 22311 | Reimbursement for supplies equip.rental,clerical and admin. services<br>Disbursement for: ☐ Primary ☐ General ☒ Other (specify): 1980 | 12/01/80 | 1,064.50 |
| D. Full Name, Mailing Address and ZIP Code<br>C&P Telephone Co. of Virginia | Telephone<br>Disbursement for: ☐ Primary ☐ General ☒ Other (specify): 1980 | 12/29/80 | 83.09 |
| E. Full Name, Mailing Address and ZIP Code<br>William P. Goldberg, Inc.<br>Washington, D. C. | Door sign<br>Disbursement for: ☐ Primary ☐ General ☒ Other (specify): 1980 | 12/29/80 | 74.62 |
| F. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| G. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| H. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| I. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| SUBTOTAL of Disbursements This Page (optional) | | | |
| TOTAL This Period (last page this line number only) | | | 5,997.21 |

Att. 2, p.24

SCHEDULE B

# ITEMIZED DISBURSEMENTS

Page 1 of 2 for
LINE NUMBER 21
(Use separate schedule(s) for each category of the Detailed Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)
NATIONAL REPUBLICAN CANDIDATES COMMITTEE

| A. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement This Period |
|---|---|---|---|
| Symms for Senate<br>P. O. Box 471<br>Boise, Idaho 83701 | Contribution<br>(Agg. 500.00)<br>Disbursement for: ☐ Primary ☒ General<br>☐ Other (specify): | 12/29/80 | 500.00 |
| B. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement This Period |
| Hawkins for Senate<br>P.O. Box 12637<br>Tallahassee, FL 32308 | Contribution<br>(Aggr. 500.00)<br>Disbursement for: ☐ Primary ☒ General<br>☐ Other (specify): | 12/29/80 | 500.00 |
| C. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement This Period |
| McCollum for Congress<br>P. O. Box 732<br>Altamonte Springs, FL | Contribution<br>(Aggr. 500.00)<br>Disbursement for: ☐ Primary ☒ General<br>☐ Other (specify): | 12/29/80 | 500.00 |
| D. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement This Period |
| Carman for Congress<br>266 Main Street<br>Farmington, N. Y. 11735 | Contribution<br>(Aggr. 500.00)<br>Disbursement for: ☐ Primary ☒ General<br>☐ Other (specify): | 12/29/80 | 500.00 |
| E. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement This Period |
| Grassley for Senate<br>P. O. Box 1000<br>Des Moines, IA 50306 | Contribution<br>(Aggr. 500.00)<br>Disbursement for: ☐ Primary ☒ General<br>☐ Other (specify): | 12/29/80 | 500.00 |
| F. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement This Period |
| Mattingly for Senate<br>P. O. Box 1980<br>Atlanta, GA 30301 | Contribution<br>(Aggr. 500.00)<br>Disbursement for: ☐ Primary ☒ General<br>☐ Other (specify): | 12/29/80 | 500.00 |
| G. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement This Period |
| D'Amato for Senate<br>1697 Broadway<br>New York, N. Y. 10019 | Contribution<br>(Aggr. 500.00)<br>Disbursement for: ☐ Primary ☒ General<br>☐ Other (specify): | 12/29/80 | 500.00 |
| H. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement This Period |
| Hunter for Congress<br>2309-1/2 National Avenue<br>San Diego, CA 92113 | Contribution<br>(Aggr. 500.00)<br>Disbursement for: ☐ Primary ☒ General<br>☐ Other (specify): | 12/29/80 | 500.00 |
| I. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement This Period |
| Molinari for Congress<br>1720 Hylan Boulevard<br>Staten Island, N.Y. 10304 | Contribution<br>(Aggr. 500.00)<br>Disbursement for: ☐ Primary ☒ General<br>☐ Other (specify): | 12/29/80 | 500.00 |
| SUBTOTAL of Disbursements This Page (optional) | | | 4,500.00 |
| TOTAL This Period (last page this line number only) | | | |

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AH. 2, p. 25

**SCHEDULE B** **ITEMIZED DISBURSEMENTS**

Page 2 of 2 for
LINE NUMBER 21
(Use separate schedule(s) for each category of the Detailed Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (In Full)
NATIONAL REPUBLICAN CANDIDATES COMMITTEE

| | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement This Period |
|---|---|---|---|
| A. Full Name, Mailing Address and ZIP Code<br>LeBoutillier for Cong<br>202 Winthrop<br>Westbury, N.Y. 11590 | Contribution (Aggr. 500.00)<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 12/29/80 | 500.00 |
| B. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| C. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| D. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| E. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| F. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| G. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| H. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| I. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| SUBTOTAL of Disbursements This Page (optional) | | | 500.00 |
| TOTAL This Period (last page this line number only) | | | 5,000.00 |

8304043560

AA.2, p.26

**SCHEDULE D**
(Revised 3/80)

# DEBTS AND OBLIGATIONS
## Excluding Loans

Page 1 of 1 for LINE NUMBER 10
(Use separate schedule for each numbered line)

| Name of Committee (in Full) NATIONAL REPUBLICAN CANDIDATES COMMITTEE | Outstanding Balance Beginning This Period | Amount Incurred This Period | Payment This Period | Outstanding Balance at Close of This Period |
|---|---|---|---|---|
| A. Full Name, Mailing Address and Zip Code of Debtor or Creditor<br>MEDIAMERICA<br>1900 N. Beauregard Street<br>Alexandria, Virginia 22311 | 9,305.92 | 10,608.10 | 5,564.50 | 14,349.52 |
| Nature of Debt (Purpose):<br>See statement attached. | | | | |
| B. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |
| C. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |
| D. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |
| E. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |
| F. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |

| | |
|---|---|
| 1) SUBTOTALS This Period This Page (optional) | |
| 2) TOTAL This Period (last page this line only) | 14,349.52 |
| 3) TOTAL OUTSTANDING LOANS from Schedule C (last page only) | |
| 4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only) | 14,349.52 |

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Att 2, p.27

Attachment to Schedule D of Report
of Receipts and Disbursements of
NATIONAL REPUBLICAN CANDIDATES COMMITTEE

Nature of Obligation Incurred this Period
to MediAmerica

| | | |
|---|---|---|
| Production and mailing services for solicitation mailed Dec. 5, 1980 | | $ 9,543.60 |
| Reimbursement of: | | |
| General clerical and administrative costs | $446.00 | |
| Accounting costs | 271.00 | |
| Rental of office equipment | 150.00 | |
| Xerox costs and supplies | 197.50 | 1,064.50 |
| TOTAL | | $10,608.10 |

8304043560

AA.2, p.28

AMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 998-0334

National Republicans Candidates
Committee
1900 N. Beauregard St., Ste. 12
Alexandria, VA. 22311

October 27, 1980

Job #0037 Invoice #758

Production and mailing services. Total count 8778 Urgent Grams. Drop date 10/25 & 10/26/80.

| | |
|---|---|
| Production: | |
| 8778 @ .50/each | $ 4,389.00 |
| Set-up | 10.00 |
| Printing: | |
| BRE #9 Blue (15K) | 569.82 |
| Carrier Window (15K) | 636.00 |
| Live stamp application | 50.00 |
| Stamp Spoilage | 17.00 |
| Postage for 8778 | 2,633.40 |
| Total Due | $8,305.92 |
| Pmt. | 3,500.00 |
| | 4,805.92 Bal. Due |

All invoices are due and payable upon receipt. All charges are payable 20 days from date of invoice. A service charge of 1.5% per month (equivalent to 18% per year) will be added to past due items.

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Att. 2, p. 29

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

November 18, 1980

National Republican
Candidates' Committee
1900 N. Beauregard St.
Alexandria, VA 22311

Invoice # 772

Reimbursement for services rendered by MediaAmerica for November, 1980.

| | |
|---|---|
| Secretarial Receptionist, General Office: | |
| J. Kanak (Caging/Batching/Zeroxing) work-up for stationery 17 hr at 5.49/hr. | $ 92.00 |
| B. Wheeler (Caging/Batching,verification 35 hr at 4.00/hr. | 140.00 |
| A. Gosain/Filing/general office 7 hr at 4.00/hr. | 28.00 |
| Keypunch & Verify Contributors List | 100.00 |
| Accounting: | |
| S. King (28 hrs at 8.24/hr.) Caging, Batching, Bank Deposits FEC report, Organizing Files. | 198.00 |
| Xerox Machine: Copies,Supplies. | 70.00 |
| IBM Typewriter, File Cabinet, Desk, Desk Chair. | 150.00 |
| Answering Telephone ($40/wk: 11-4-80/11-30-80) | 140.00 |
| Administrative (S. King 10 hrs at 8.24) Chart of Accounts/Opening Bank Accounts | 82.00 |
| TOTAL | $1,000.00 |

Paid

30404356007

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# MEDIAMERICA

Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

**INVOICE**
**000010**

All charges are payable 30 days from date of invoice. A SERVICE CHARGE of 1.5% per month (equivalent to 18% per year) will be added to past due items.

National Republican Candidates Committee
1900 North Beauregard Street, #12
Alexandria, Virginia 22311

| Account Number |
|---|
| |

Job #0090

PURCHASE ORDER NO.

Please Send One Copy With Remittance

| DATE | INVOICE NUMBER | DESCRIPTION | AMOUNT |
|---|---|---|---|
| 12/12/80 | | Composition/Production of 12,245 UrgentGrams. | |
| | | Drop date - December 5, 1980. | |
| | | -Copy Creative Fee | $ 1,000.00 |
| | | -UrgentGram @ .50/unit | 6,122.50 |
| | | -Printing - Envelopes | 584.35 |
| | | 20K Blue Wove Black Ink | |
| | | -Postage (.15 each) | 1,836.75 |
| | | TOTAL DUE | $ 9,543.60 |
| | | Paid on Account 1/10/81 - Ck. #116 | 2,000.00 |
| | | BALANCE DUE | $ 7,543.60 |

Claims for defects, damages or shortages must be made in writing within a period of ten (10) days after delivery.

Att. 2, p. 31.

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

November 26, 1980

National Republican
Candidates' Committee
1900 N. Beauregard St.
Alexandria, VA 22311

Invoice # 776

Reimbursement of services rendered by MediaAmerica for December, 1980.

| | |
|---|---|
| **Secretarial Receptionist:** | |
| Answering telephone(40/week:12/1-12/31) | $ 160.00 |
| Anita Gosain-general office-set-up files (37.5 hr x 4) | 150.00 |
| Filing at 4hr x 4.00 | 16.00 |
| **Supplies:** | |
| 5 Boxes file folders at($15/each) | 75.00 |
| 2 Boxes letter size folders($12/each) | 24.00 |
| 3 Packages of red tabs($3/each) | 9.00 |
| 1 Package of white tabs | 1.50 |
| 1 Accounting check holder | 18.00 |
| **Keypunch**: Contributors and verify | 120.00 |
| **Xerox Machine**: Copies and supplies | 70.00 |
| **IBM Typewriter,** File Cabinet, Desk & Desk Chair | 150.00 |
| **Accounting & General Office:** | |
| S. King (8.24 x 33 hours) | |
| FEC Report | |
| Caging and batching | |
| Bank deposits | 271.00 |
| TOTAL | $ 1,064.50 |

Paid —

8 3 0 4 0 4 3 5 6 0 3

Attachment 3 - Letters

8 3 0 4 0 4 3 5 6 1 0

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. J. Curtis Herge, Esq.
Sedam & Herge
7600 Old Springhouse Road
McLean, VA 22102

Re: MUR 1363

Dear Mr. Herge:

The Federal Election Commission notified your clients on January 30, 1981, of a complaint which alleges that your clients had violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time. We acknowledge receipt of your explanation of this matter which was dated February 25, 1981.

Upon further review of the allegations contained in the complaint, and information submitted by you, the Commission, on , 1981, determined that:

1. because certain key principals of MediaAmerica, Inc., (MediaAmerica) are actively involved in the affairs of the, National Republican Candidates Committee (NRCC), and because MediaAmerica has provided funds and services for the establishment and administration of NRCC, MediaAmerica appears to be the connected organization of NRCC, 2 U.S.C. § 431(17). There is, therefore, reason to believe that MediaAmerica violated 2 U.S.C. §§ 441b(a) and 441b(b)(4)(A)(i) by financing communications with and solicitation of contributions from persons outside the permissible class.

2. because it appears that NRCC is the separate segregated fund of MediaAmerica, there is reason to believe that NRCC violated 2 U.S.C. §§ 441b(a) and 441b(b)(4)(A)(i) by communicating with and soliciting contributions to a separate segregated fund established by a corporation from persons outside the permissible class for such a fund;

3. because NRCC failed to include in its name the name of its connected organization there is reason to believe that NRCC violated 2 U.S.C. § 432(e)(5);

4. because NRCC failed to include the name of its connected organization on its Statement of Organization, there is reason to believe that NRCC violated 2 U.S.C. § 433(b)(2);

5. because NRCC failed to amend its Statement of Organization within ten days from the time of a change in the office of treasurer, or other change in previously reported information, there is reason to believe that NRCC violated 2 U.S.C. § 433(c);

6. because NRCC has the responsibility of amending its Statement of Organization within ten days from the date of a change in previously reported information (see #5 above) there is no reason to believe that John D. Romanin individually violated 2 U.S.C. § 433(b)(2);

7. because NRCC appears to be the separate segregated fund of MediaAmerica and thereby restricted to solicitations of a limited class, there is no reason to believe that NRCC violated 2 U.S.C. § 441d(a) or 11 C.F.R. § 110.11(a)(1).

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

The Office of General Counsel would like to settle this matter through conciliation prior to finding probable cause. See 11 C.F.R. § 111.18(d). However, in the absence of any information which demonstrates that no further action should be taken against your clients, the Office of General Counsel must proceed to the next complaince stage as noted on page 2, paragraph 2 of the enclosed procedures.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you have any questions, please contact Steve Mims, the staff member assigned to this matter at (202) 523-4060.

Sincerely,

Enclosure
Procedures

8 3 0 4 0 4 3 5 6 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Karen E. Dent
4608 North 26th Street
Arlington, VA 22207

Re: MUR 1363

Dear Ms. Dent

On February 18, 1981, the Commission notified you of a complaint alleging that you had violated certain provisions of the Federal Election Campaign Act of 1971, as amended.

The Commission, on , 1981, determined that on the basis of the information in the complaint and information provided by counsel for the National Republican Candidates Committee, et. al., there is no reason to believe that a violation of any statute within its jurisdiction had been committed by you.

Sincerely,

Charles N. Steele
General Counsel

9304035611

MEMORANDUM FOR THE FILE : MUR 1363

RE: Return of Notification of Complaint Letter to Karen E. Dent

DATE : March 17, 1981
FROM : Steve Mims

Notification was originally sent to respondent Dent at the address shared by the other respondents in the MUR. The attorney for the remaining respondents notified the Commission that Dent was no longer employed by respondent MEDIAAMERICA and her last known address was provided by the attorney.

Subsequent notification was sent to 4608 North 26th Street, Arlington, VA, 22207. This notice was returned unclaimed by the Post Office on or about March 16, 1981.

Due to the fact that it appears likely that a recommendation of no RTB will be made regarding this respondent, the Dockett Room is requested to re-mail the notification by regular mail.

cc: work file

2304043561

CRM
4039

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
81 FEB 25 P 1:05


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CABLE: SEDAMHERGE


February 25, 1981

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

Attention: Steve Mims, Esq.

Re: MUR 1363

Dear Mr. Steele:

This letter is written on behalf of our clients, National Republican Candidates' Committee; MediAmerica, Inc.; Mr. John D. Romanin; and, Mr. D. Richard Geske, four of the five respondents named in the complaint filed with the Federal Election Commission by the Republican National Committee, the National Republican Congressional Committee and the National Republican Senatorial Committee, which has been denominated by the Federal Election Commission as MUR 1363.* This firm has not been authorized to appear in this matter by K. E. Dent.

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*National Republican Candidates' Committee mailed a letter of representation to the Federal Election Commission on February 4, 1981. Enclosed herewith are letters of representation of MediAmerica, Inc., Mr. John D. Romanin and Mr. D. Richard Geske.


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The respondent, National Republican Candidates' Committee (hereinafter "NRCC"), was organized in accordance with the provisions of the Federal Election Campaign Act of 1971, as amended, when it filed with the Federal Election Commission a Statement of Organization, FEC Form 1, dated June 30, 1980. That Statement of Organization reported that NRCC would support or oppose more than one Federal candidate; that it is not a separate segregated fund or a party committee; that it has no connected organization or affiliated committee; and, that K. [Karen] E. Dent was the treasurer of the committee. Except for its Statement of Organization, as amended, NRCC has no charter or other governing document. The complainants in this matter have alleged, inter alia, that NRCC is the separate segregated fund of MediAmerica, Inc.; that, if NRCC is the separate segregated fund of MediAmerica, Inc., sections of the Act relating to registration, reporting and the solicitation of contributions have been violated; that solicitations failed to identify the person who authorized and paid for the communications; that certain reports of NRCC were not signed by its treasurer; that MediAmerica, Inc., if not the connected organization of NRCC, extended unlawful credit to NRCC; and, that the alleged violations were made in a knowing and willful manner. While certain of the allegations made by complainants are true, and will be admitted herein, we will demonstrate that a number of the allegations are without foundation and should be dismissed.

The genesis of NRCC is that it was eventually organized as a consequence of a conversation between Mr. Geske and Mr. Romanin about the potential impact on Federal

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elections of the so-called Obey-Railsback campaign reform legislation. In the view of Messrs. Geske and Romanin, who happen to be personal friends as well as business colleagues, the Federal Election Campaign Act of 1971 and the Obey-Railsback bill encouraged the organization and operation of multicandidate political committees. It was the specific objective of Messrs. Geske and Romanin to organize a committee that could be operated at a limited cost and that could utilize mass direct-mail solicitation techniques. By reason of the fact that Messrs. Geske and Romanin were associated with MediAmerica, Inc., an advertising firm with experience in commercial direct-mail techniques, it was believed that their objectives could be accomplished by utilizing the resources of MediAmerica, Inc. to produce the direct-mail solicitations; and, to provide office space, equipment and administrative support on a reimbursable basis. These plans were discussed with Karen E. Dent, who, we are advised, agreed to participate as the committee's Treasurer. Mr. Geske assumed the title of Chairman of NRCC and Mr. Romanin assumed the title of National Finance Chairman. It was by coincidence that these three individuals were also employees of MediAmerica, Inc.

Logic dictates that NRCC was not established as the separate segregated fund of MediAmerica, Inc. MediAmerica, Inc. has one individual stockholder and approximately six executive or administrative personnel on its staff. The goals of the organizers of NRCC...to engage MediAmerica, Inc. to produce mass direct-mail solicitations...could not

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have been met if NRCC were the separate segregated fund of MediAmerica, Inc. Furthermore, the decision to establish NRCC was not a corporate decision of MediAmerica, Inc.

Unfortunately, from the time the decision was made by Messrs. Geske, Romanin and Ms. Dent to form NRCC, a combination of events and a lack of understanding of the provisions of the Federal Election Campaign Act of 1971, as amended, culminated in a series of problems for NRCC. The most significant problem was that, on or about July 23, 1980, Karen E. Dent failed to report to work as the bookkeeper and accountant of MediAmerica, Inc. It was learned almost immediately that there were significant and substantial irregularities in the books and accounts of MediAmerica, Inc. We are advised that that discovery led to an investigation by First American Bank of Virginia and by the Arlington and Alexandria police, which resulted in the arrest of Ms. Dent by the Arlington police. The turmoil occasioned by the incident involving Ms. Dent preoccupied Mr. Geske and Mr. Romanin and, as a result, NRCC remained relatively quiescent during the early months of its existence.

Following the departure of Ms. Dent, Mr. Romanin assumed the position of Treasurer of NRCC. Among other things, he took steps to open a bank account for NRCC at United Virginia Bank. A copy of the authorization submitted to United Virginia Bank by NRCC, dated September 23, 1980, is enclosed. It will be noted that Mr. Romanin is described as the Treasurer of NRCC in that authorization. Neither Mr. Geske, Mr. Romanin nor any other person associated with NRCC

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was aware of the requirement that an amended Statement of Organization, FEC Form 1, had to be filed with the Federal Election Commission, recording the designation of Mr. Romanin as the new Treasurer of NRCC. For the record, there is enclosed and filed herewith an amended Statement of Organization of NRCC, FEC Form 1, dated July 23, 1980, reporting Mr. Romanin's designation as Treasurer of the Committee as of that date.*

Another unfortunate incident which befell NRCC was that, when it filed its original Statement of Organization, the Federal Election Commission mistakenly recorded NRCC as a party committee. That act by the Commission, which was clearly in contravention of the terms of NRCC's Statement of Organization, resulted in confusion and it raised the ire of the three national committees of the Republican Party. (See, letter from Chairman Brock to Chairman McGarry, dated January 13, 1981; letter from Chairman McGarry to Chairman Brock, dated January 15, 1981; and, release from the Press Office of the Federal Election Commission, dated January 15, 1981.) The three national committees of the Republican Party, apparently concerned that NRCC was representing itself as a party committee, are the complainants in this matter. NRCC has taken every reasonable step to extricate itself from the confusion caused by the error of the Federal Election Commission in listing it as a party committee. It has filed an amended Statement of Organization, dated January 13, 1981, showing...using phrases and a format recommended by

*NRCC filed with the Federal Election Commission an amended Statement of Organization, FEC Form 1, dated January 13, 1981, reporting that as of that date S. King assumed the position of Treasurer of NRCC.

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the staff of the Commission... that it is not affiliated with the Republican Party. That amendment was followed by a separate letter from NRCC to the Commission, dated January 14, 1981, explaining that it is neither an affiliate, nor a subordinate, of any party committee. To avoid any possibility of further confusion, there is enclosed and filed herewith an amended Statement of Organization of NRCC, dated February 25, 1981, changing the name of the committee to National Candidates Committee.*

Turning now to the reports of receipts and disbursements filed by NRCC, one will note that they were prepared and presented in a manner which clearly evidences a lack of understanding and familiarity, on the part of the individuals associated with the committee, with the provisions of the Act. The original Report of Receipts and Disbursements of NRCC, for the period July 1, 1980 through September 30, 1980, was not filed with the Federal Election Commission until December 8, 1980 and then only after a reminder from the Commission. It was noted by counsel to be deficient in several respects and, for that reason, an amended Report is enclosed and filed herewith.

The original Report of Receipts and Disbursements of NRCC, for the period October 1, 1980 through November 24, 1980, was filed in a timely fashion but, it too, was found deficient. (See lines 4(a), 6(a), 6(c), 11(a) and Schedule D.) For that reason, an amended Report is enclosed and filed herewith.

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*For consistency, the committee shall continue to be referred to as NRCC throughout the balance of this letter.

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The original Report of Receipts and Disbursements of NRCC, for the period November 25, 1980 through December 31, 1980, while timely filed, was also found deficient. (See lines 6(a), 6(c), 6(d), 8, 11(a), 11(d), 18, 29, 31, Schedule B for line 19, Schedule B for line 21 and Schedule D.) For that reason, an amended Report is enclosed and filed herewith.

While the reports filed by NRCC required amendment to comply with the provisions of the Act, the record is, and has been, abundantly clear that MediAmerica, Inc. has not financially supported NRCC, nor has MediAmerica, Inc. extended credit to NRCC in violation of 2 U.S.C. 441b(a). During the period from the date of its organization until her departure, Karen E. Dent spent approximately 1.5 hours of her time obtaining, preparing, typing and filing the original Statement of Organization of NRCC; and, an additional 1.5 hours in making the necessary arrangements to open the checking account of NRCC. Clearly, that time was incidental as defined in 11 CFR 114.9(a). Furthermore, prior to October 1, 1980, the total time expended by MediAmerica, Inc. personnel on NRCC consisted of approximately 40 minutes by S. King in recording and depositing the checks totalling $300.00; and of approximately 20 minutes by Messrs. Geske and Romanin in discussing a budget for NRCC and general administrative matters. Clearly, that time was also incidental as defined in 11 CFR 114.9(a).

In its Post General Election Report, NRCC reported an obligation due MediAmerica, Inc. of $9,305.92, of which

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$8,305.92 was for the production and mailing of the first solicitation (see, invoice #758 attached) and $1,000.00 was for administrative and operating costs (see, invoice #772 attached). Of that obligation, NRCC paid MediAmerica, Inc. the sum of $4,500.00 within a commercially reasonable time on December 1, 1980.

In its Year-End Report, NRCC reported that it incurred an additional obligation to MediAmerica, Inc. of $10,608.10, of which $9,543.60 was for the production and mailing of the second solicitation (see, invoice #000010 attached) and $1,064.50 was for administrative and operating costs (see, invoice #776 attached). On December 1, 1980, NRCC paid MediAmerica, Inc. $1,064.50 and, on January 10, 1981, NRCC paid MediAmerica, Inc. an additional $2,000.00. Furthermore, the Year-End Report shows that NRCC paid $275.00 directly to the landlord on December 1, 1980 for rental of the office space it utilizes.

As a consequence, it is evident that NRCC has been billed for, and has paid, its pro-rata expenses for space and equipment rental, supplies and personnel costs. Furthermore, it is evident that MediAmerica, Inc. has rendered invoices for its professional services rendered in producing its direct-mail solicitations; that it was paid $5,500.00 for those services to date; and, that the balance has not been outstanding for a period which is commercially unreasonable in the trade.

Thus, in conclusion, while mistakes were made in the organization and administration of NRCC, one series of

related allegations made by complainants can not withstand scrutiny. Those are the allegations that MediAmerica, Inc. is the connected organization of NRCC. As noted, Messrs. Geske and Romanin are employees of MediAmerica, Inc. Furthermore, Karen E. Dent was an employee of MediAmerica, Inc. However, NRCC was organized by these individuals in free and common association as individuals, not as employees of MediAmerica, Inc. Their individual goals were achieved by engaging MediAmerica, Inc. to produce its direct-mail solicitations and by meeting its administrative and operating costs on a pro-rata and reasonable basis. All of the costs incurred were accounted for in the original reports filed by NRCC and the credit extended to NRCC for that purpose has not been in violation of 2 U.S.C. 441b(a).

As a consequence of the foregoing and with reference to the specific violations alleged in the complaint, respondents MediAmerica, Inc., NRCC, Geske and Romanin respond as follows:

The paragraphs numbered herein correspond to the paragraph numbers in the complaint.

6. Admit, but deny MediAmerica is the connected organization of NRCC;

7. Admit, but deny MediAmerica is the connected organization of NRCC;

8. Admit that NRCC solicited contributions from individuals other than executive or administrative personnel and their families or shareholders and their families of MediAmerica, but deny that that activity constituted a violation of 2 U.S.C. 441b(b)(4)(i);

9. Deny, in that Romanin was Treasurer of NRCC from on or about July 23, 1980 until on or about January 13, 1981;

10. Admit;

11. Deny, for the reasons set forth in paragraph 9, above;

12. Admit, but deny MediAmerica is the connected organization NRCC;

13. Admit that MediAmerica is not the connected organization of NRCC, but deny that it extended credit in violation of 2 U.S.C. 441b(a);

14. The response herein is the same as the response in paragraph 13, above;

15. The response herein is the same as the response in paragraph 9, above;

16. Admit;

17. Admit, but deny MediAmerica is the connected organization of NRCC;

18. Deny.

In summary, the Federal Election Commission should find reason to believe that the respondents herein (1) violated 2 U.S.C. 433(c) by failing to amend the statement of organization, as required, to report that Mr. Romanin became Treasurer of NRCC on or about July 23, 1980; and (2) violated 2 U.S.C. 441d(a)(3) by failing to identify on its solicitations the person who authorized and paid for the communications (although it is readily apparent in the text of the solicitation that NRCC was its source). The record is clear, however, that the foregoing violations were not knowing and willful.

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Furthermore, the Commission should take cognizance of the fact that any confusion as to whether NRCC was a party committee was due to the error of its staff in listing it as such. The Commission should, on the other hand and for the reasons stated herein, dismiss the remaining allegations made in the complaint.

Respectfully submitted,

Sincerely yours,

J. Curtis Herge

J. Curtis Herge
Counsel to National Republican Candidates' Committee, MediAmerica, Inc., Mr. John D. Romanin and Mr. D. Richard Geske

enclosures

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February 25, 1981

To: Federal Election Commission

From: National Republican Candidates' Committee
MediAmerica, Inc.
John D. Romanin
D. Richard Geske

Subject: MUR 1363

This is to certify that the matters of fact set forth in the letter from J. Curtis Herge, Esq. to the General Counsel of the Federal Election Commission relative to MUR 1363, dated February 25, 1981, are to the best of our knowledge true and correct.

National Republican Candidates' Committee

By S. King
S. King, Treasurer

MediAmerica, Inc.

By
President

John D. Romanin

D. Richard Geske

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OFFICE OF THE
GENERAL COUNSEL

81 FEB 25 P1:05

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
Washington, D.C. 20463

February 13, 1981

LETTER OF REPRESENTATION

Gentlemen:

In reference to MUR 1363, I hereby authorize Mr. J. Curtis Herge of Sedam and Herge, 7600 Old Springhouse Road, Mclean, Virginia, 22102 to represent me and to receive any notifications and/or other communications from the Federal Election Commission concerning MUR 1363.

D. Richard Geske

D. Richard Geske

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OFFICE OF THE
GENERAL COUNSEL
FEB 25 P 1:06

JDR

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
Washington, D.C. 20463

February 13, 1981

LETTER OF REPRESENTATION

83040435628

Gentlemen:

In reference to MUR 1363, I hereby authorize Mr. J. Curtis Herge of Sedam and Herge, 7600 Old Springhouse Road, Mclean, Virginia, 22102 to represent me and to receive any notifications and/or other communications from the FEC concerning MUR 1363.

John D. Romanin

MEDIAMERICA
Mark Center Office Plaza 5
5600 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 998-0334

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
81 FEB 25 P1:08

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
Washington, D.C. 20463

February 13, 1981

LETTER OF REPRESENTATION

Gentlemen:

In reference to MUR 1363, MediAmerica herein authorizes the following counsel:

J. Curtis Herge
Sedam and Herge
7600 Old Springhouse Road
Mclean, Virginia 22102

(703) 821-1000

Mr. Herge is authorized to receive any notifications and/or other communications from the Federal Ele ction Commission concerning MUR 1363.

D. Richard Geske

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copy

# Authority of Lodge, Association or Other Similar Organization to Open Deposit Account

To United Virginia Bank
NAME OF BANK

1406 Beauregard, Alexandria VA. 22311
ADDRESS

Date 9/23/80

At a regular meeting of the Board of Directors

of the National Republicans Candidates Committee

held on the 18th day of August, 1980 at which a quorum was present, the following officers were duly elected for the ensuing year and until their successors shall be elected and shall have qualified:

| Name | Title | Specimen Signature |
|---|---|---|
| John D. Romanin | Treasurer/Secretary | |
| D. Richard Geske | Chairman | |
| | | |
| | | |

Under the rules of the

Any funds deposited to its credit with a bank or trust company may be withdrawn by the Treasurer

John D. Romanin (1 signature only)
(Use blank spaces for titles of signing officers ad state whether checks will bear one signature or will be signed and countersigned)

who is authorized to endorse and sign Checks, Drafts and Orders for the payment of money.

The authority herein given is to remain irrevocable so far as the above bank is concerned until it be notified in writing of the revocation of such authority and shall in writing acknowledge receipt thereof.

Affix Seal Below

Secretary

Approved:

To be signed by the
signing officers

NR 447

# STATEMENT OF ORGANIZATION

(see reverse side for instructions)

1. (a) Name of Committee (in Full) ☐ Check if name or address is changed.
NATIONAL REPUBLICAN CANDIDATES COMMITTEE

2. Date
July 23, 1980

(b) Address (Number and Street)
1900 N. Beauregard Street, Suite 12

3. FEC Identification Number
C00130682

(c) City, State and ZIP Code
Alexandria, Virginia 22311

4. Is this an amended Statement? ☒ YES ☐ NO

5. TYPE OF COMMITTEE (check one):

☐ (a) This committee is a principal campaign committee. (Complete the candidate information below.)

☐ (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

| Name of Candidate | Candidate Party Affiliation | Office Sought | State/District |
|---|---|---|---|
| | | | |

☐ (c) This committee supports/opposes only one candidate _____ (name of candidate) and is NOT an authorized committee.

☐ (d) This committee is a _____ (National, State or subordinate) committee of the _____ (Democratic, Republican, etc.) Party.

☐ (e) This committee is a separate segregated fund.

☐ (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

6.

| Name of Any Connected Organization or Affiliated Committee | Mailing Address and ZIP Code | Relationship |
|---|---|---|
| | | |

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

☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization ☐ Membership Organization ☐ Trade Association ☐ Cooperative

7. **Custodian of Records:** Identify by name, address (phone number – optional) and position, the person in possession of committee books and records.

| Full Name | Mailing Address and ZIP Code | Title or Position |
|---|---|---|
| S. King | 1900 N. Beauregard Street, Suite 12<br>Alexandria, Virginia 22311 | Accountant |

8. **Treasurer:** List the name and address (phone number – optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

| Full Name | Mailing Address and ZIP Code | Title or Position |
|---|---|---|
| John D. Romanin | 1900 N. Beauregard Street, Suite 12<br>Alexandria, Virginia 22311 | Treasurer |

9. **Banks or Other Depositories:** List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

| Name of Bank, Depository, etc. | Mailing Address and ZIP Code |
|---|---|
| | |

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

JOHN D. ROMANIN
Type or Print Name of Treasurer

SIGNATURE OF TREASURER

2/25/81
Date

**NOTE:** Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.

**For further information contact:** Federal Election Commission, Toll Free 800-424-9530, Local 202-523-4068

FEC FORM 1 (3/80)

# STATEMENT OF ORGANIZATION

(see reverse side for instructions)

1. (a) Name of Committee (in Full) ☒ Check if name or address is changed.
NATIONAL CANDIDATES COMMITTEE*

(b) Address (Number and Street)
1900 N. Beauregard Street, Suite 12

(c) City, State and ZIP Code
Alexandria, Virginia 22311

2. Date
February 25, 1981

3. FEC Identification Number
C00130682

4. Is this an amended Statement? ☒ YES ☐ NO

5. TYPE OF COMMITTEE (check one): *formerly known as: NATIONAL REPUBLICAN CANDIDATES COMMITTEE

☐ (a) This committee is a principal campaign committee. (Complete the candidate information below.)

☐ (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

| Name of Candidate | Candidate Party Affiliation | Office Sought | State/District |
|---|---|---|---|
| | | | |

☐ (c) This committee supports/opposes only one candidate _____ and is NOT an authorized committee.
(name of candidate)

☐ (d) This committee is a _____ committee of the _____ Party.
(National, State or subordinate) (Democratic, Republican, etc.)

☐ (e) This committee is a separate segregated fund.

☐ (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

| 6. Name of Any Connected Organization or Affiliated Committee | Mailing Address and ZIP Code | Relationship |
|---|---|---|
| | | |

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

☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization ☐ Membership Organization ☐ Trade Association ☐ Cooperative

7. **Custodian of Records:** Identify by name, address (phone number — optional) and position, the person in possession of committee books and records.

| Full Name | Mailing Address and ZIP Code | Title or Position |
|---|---|---|
| | | |

8. **Treasurer:** List the name and address (phone number — optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

| Full Name | Mailing Address and ZIP Code | Title or Position |
|---|---|---|
| | | |

9. **Banks or Other Depositories:** List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

| Name of Bank, Depository, etc. | Mailing Address and ZIP Code |
|---|---|
| | |

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

S. KING
Type or Print Name of Treasurer

S. King
SIGNATURE OF TREASURER

2/25/81
Date

**NOTE:** Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.

**For further information contact:** Federal Election Commission, Toll Free 800-424-9530, Local 202-523-4068

FEC FORM 1 (3/80)

# REPORT OF RECEIPTS AND DISBURSEMENTS
## For a Political Committee Other Than an Authorized Committee

(Summary Page)

1. Name of Committee (in Full)
NATIONAL REPUBLICAN CANDIDATES COMMITTEE

Address (Number and Street)
1900 N. Beauregard Street, Suite 12

City, State and ZIP Code
Alexandria, Virginia 22311

☐ Check if address is different than previously reported.

2. FEC Identification Number
C00130682

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a)
- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☒ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Monthly Report for _____
- ☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
- ☐ Thirtieth day report following the General Election on _____ in the State of _____
- ☐ Termination Report

(b) Is this Report an Amendment?
☒ YES ☐ NO

| SUMMARY | Column A This Period | Column B Calendar Year-to-Date |
|---|---|---|
| 5. Covering Period 6-30-80 Through 9-30-80 | | |
| 6. (a) Cash on Hand January 1, 1980 | | $ -0- |
| (b) Cash on Hand at Beginning of Reporting Period | $ -0- | |
| (c) Total Receipts (from Line 18) | $ 300.00 | $ 300.00 |
| (d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B) | $ 300.00 | $ 300.00 |
| 7. Total Disbursements (from Line 28) | $ -0- | $ -0- |
| 8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) | $ 300.00 | $ 300.00 |
| 9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D) | $ -0- | |
| 10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D) | $ -0- | |

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

S. KING
Type or Print Name of Treasurer

S. King
SIGNATURE OF TREASURER

2/25/81
Date

For further information, contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | | | | | | | |

FEC FORM 3X (3/80)

# DETAILED SUMMARY PAGE
## of Receipts and Disbursements
## (Page 2, FEC FORM 3X)

Name of Committee (in Full): NATIONAL REPUBLICAN CANDIDATES COMMITTEE

Report Covering the Period: From: 6/30/80 To: 9/30/80

| | COLUMN A Total This Period | COLUMN B Calendar Year-to-Date |
|---|---|---|
| **I. RECEIPTS** | | |
| 11. CONTRIBUTIONS (other than loans) FROM: | | |
| (a) Individuals/Persons Other Than Political Committees | 300.00 | 300.00 |
| (Memo Entry Unitemized $ 300.00 ) | | |
| (b) Political Party Committees | | |
| (c) Other Political Committees | | |
| (d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c) | 300.00 | 300.00 |
| 12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES | | |
| 13. ALL LOANS RECEIVED | | |
| 14. LOAN REPAYMENTS RECEIVED | | |
| 15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.) | | |
| 16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES | | |
| 17. OTHER RECEIPTS (Dividends, Interest, etc.) | | |
| 18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17) | 300.00 | 300.00 |
| **II. DISBURSEMENTS** | | |
| 19. OPERATING EXPENDITURES | | |
| 20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES | | |
| 21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES | | |
| 22. INDEPENDENT EXPENDITURES (Use Schedule E) | | |
| 23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F) | | |
| 24. LOAN REPAYMENTS MADE | | |
| 25. LOANS MADE | | |
| 26. REFUNDS OF CONTRIBUTIONS TO: | | |
| (a) Individuals/Persons Other Than Political Committees | | |
| (b) Political Party Committees | | |
| (c) Other Political Committees | | |
| (d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c) | | |
| 27. OTHER DISBURSEMENTS | | |
| 28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27) | -0- | -0- |
| **III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES** | | |
| 29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d | 300.00 | 300.00 |
| 30. TOTAL CONTRIBUTION REFUNDS from Line 26d | | |
| 31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29) | 300.00 | 300.00 |
| 32. TOTAL OPERATING EXPENDITURES from Line 19 | | |
| 33. OFFSETS TO OPERATING EXPENDITURES from Line 15 | | |
| 34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32) | -0- | -0- |

80040356334

# REPORT OF RECEIPTS AND DISBURSEMENTS
## For a Political Committee Other Than an Authorized Committee

(Summary Page)

1. Name of Committee (in Full)
NATIONAL REPUBLICAN CANDIDATES COMMITTEE

Address (Number and Street)
1900 N. Beauregard Street, Suite 12

City, State and ZIP Code
Alexandria, Virginia 22311

☐ Check if address is different than previously reported.

2. FEC Identification Number
C00130682

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a)
- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Monthly Report for _____
- ☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
- ☒ Thirtieth day report following the General Election on 11/4/80 ~~XXXXXXXX~~
- ☐ Termination Report

(b) Is this Report an Amendment? ☒ YES ☐ NO

| SUMMARY | Column A This Period | Column B Calendar Year-to-Date |
|---|---|---|
| 5. Covering Period 10-1-80 Through 11-24-80 | | |
| 6. (a) Cash on Hand January 1, 1980 | | $ -0- |
| (b) Cash on Hand at Beginning of Reporting Period | $ 300.00 | |
| (c) Total Receipts (from Line 18) | $ 9,813.50 | $ 10,113.50 |
| (d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B) | $ 10,113.50 | $ 10,113.50 |
| 7. Total Disbursements (from Line 28) | $ 106.31 | $ 106.31 |
| 8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) | $ 10,007.19 | $ 10,007.19 |
| 9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D) | $ -0- | |
| 10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D) | $ 9,305.92 | |

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

S. KING
Type or Print Name of Treasurer

S. King
SIGNATURE OF TREASURER

2/25/81
Date

For further information, contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

FEC FORM 3X (3/80)

# DETAILED SUMMARY PAGE
## of Receipts and Disbursements
## (Page 2, FEC FORM 3X)

Name of Committee (in Full)
NATIONAL REPUBLICAN CANDIDATES COMMITTEE

Report Covering the Period:
From: 10/1/80 To: 11/24/80

| | COLUMN A Total This Period | COLUMN B Calendar Year-to-Date |
|---|---|---|
| **I. RECEIPTS** | | |
| 11. CONTRIBUTIONS (other than loans) FROM: | | |
| (a) Individuals/Persons Other Than Political Committees | 9,813.50 | 10,113.50 |
| (Memo Entry Unitemized $ 9,813.50) | | |
| (b) Political Party Committees | | |
| (c) Other Political Committees | | |
| (d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c) | 9,813.50 | 10,113.50 |
| 12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES | | |
| 13. ALL LOANS RECEIVED | | |
| 14. LOAN REPAYMENTS RECEIVED | | |
| 15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.) | | |
| 16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES | | |
| 17. OTHER RECEIPTS (Dividends, Interest, etc.) | | |
| 18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17) | 9,813.50 | 10,113.50 |
| **II. DISBURSEMENTS** | | |
| 19. OPERATING EXPENDITURES | 106.31 | 106.31 |
| 20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES | | |
| 21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES | | |
| 22. INDEPENDENT EXPENDITURES (Use Schedule E) | | |
| 23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F) | | |
| 24. LOAN REPAYMENTS MADE | | |
| 25. LOANS MADE | | |
| 26. REFUNDS OF CONTRIBUTIONS TO: | | |
| (a) Individuals/Persons Other Than Political Committees | | |
| (b) Political Party Committees | | |
| (c) Other Political Committees | | |
| (d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c) | | |
| 27. OTHER DISBURSEMENTS | | |
| 28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27) | 106.31 | 106.31 |
| **III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES** | | |
| 29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d | 9,813.50 | 10,113.50 |
| 30. TOTAL CONTRIBUTION REFUNDS from Line 26d | | |
| 31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29) | 9,813.50 | 10,113.50 |
| 32. TOTAL OPERATING EXPENDITURES from Line 19 | 106.31 | 106.31 |
| 33. OFFSETS TO OPERATING EXPENDITURES from Line 15 | | |
| 34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32) | 106.31 | 106.31 |

**SCHEDULE D**
(Revised 3/80)

# DEBTS AND OBLIGATIONS
## Excluding Loans

Page 1 of 1 for
LINE NUMBER 10
(Use separate schedules for each numbered line)

| Name of Committee (in Full) NATIONAL REPUBLICAN CANDIDATES COMMITTEE | Outstanding Balance Beginning This Period | Amount Incurred This Period | Payment This Period | Outstanding Balance at Close of This Period |
|---|---|---|---|---|
| A. Full Name, Mailing Address and Zip Code of Debtor or Creditor<br>MEDIAMERICA<br>1900 N. Beauregard Street<br>Alexandria, Virginia 22311 | -0- | 9,305.92 | -0- | 9,305.92 |
| Nature of Debt (Purpose):<br>See statement attached. | | | | |
| B. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |
| C. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |
| D. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |
| E. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |
| F. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |
| 1) SUBTOTALS This Period This Page (optional) | | | | |
| 2) TOTAL This Period (last page this line only) | | | | 9,305.92 |
| 3) TOTAL OUTSTANDING LOANS from Schedule C (last page only) | | | | |
| 4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only) | | | | 9,305.92 |

3 3 0 4 0 4 3 5 6 3 7

Attachment to Schedule D of Report of
Receipts and Disbursements of
NATIONAL REPUBLICAN CANDIDATES COMMITTEE
For the Period Oct. 1, 1980 through Nov. 24, 1980

Nature of obligation due MediAmerica

| | | |
|---|---|---|
| Production and mailing services for solicitation mailed Oct. 25 and 26, 1980 | | $8,305.92 |
| Reimbursement of: | | |
| General clerical and administrative costs | $442.00 | |
| Accounting costs | 198.00 | |
| Telephone costs | 140.00 | |
| Rental of office equipment | 150.00 | |
| Xerox costs and supplies | 70.00 | 1,000.00 |
| TOTAL | | $9,305.92 |

9 3 0 4 0 4 3 5 6 1 8

# REPORT OF RECEIPTS AND DISBURSEMENTS
## For a Political Committee Other Than an Authorized Committee

(Summary Page)

1. Name of Committee (in Full)

NATIONAL REPUBLICAN CANDIDATES COMMITTEE

Address (Number and Street)

1900 N. Beauregard Street, Suite 12

City, State and ZIP Code

Alexandria, Virginia 22311

☐ Check if address is different than previously reported.

2. FEC Identification Number

C00130682

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on 12/30/80 (date)

4. TYPE OF REPORT (check appropriate boxes)

(a)
- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☒ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Monthly Report for _____
- ☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
- ☐ Thirtieth day report following the General Election on _____ in the State of _____
- ☐ Termination Report

(b) Is this Report an Amendment? ☒ YES ☐ NO

| SUMMARY | Column A This Period | Column B Calendar Year-to-Date |
|---|---|---|
| 5. Covering Period 11/25/80 Through 12/31/80 | | |
| 6. (a) Cash on Hand January 1, 19 80 | | $ -0- |
| (b) Cash on Hand at Beginning of Reporting Period | $ 10,007.19 | |
| (c) Total Receipts (from Line 18) | $ 6,897.81 | $ 17,011.31 |
| (d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B) | $ 16,905.00 | $ 17,011.31 |
| 7. Total Disbursements (from Line 28) | $ 10,997.21 | $ 11,103.52 |
| 8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) | $ 5,907.79 | $ 5,907.79 |
| 9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D) | $ -0- | |
| 10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D) | $ 14,349.52 | |

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

S. KING
Type or Print Name of Treasurer

S. King
SIGNATURE OF TREASURER

2/25/81
Date

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | | | | | | | |

FEC FORM 3X (3/80)

# DETAILED SUMMARY PAGE
## of Receipts and Disbursements
## (Page 2, FEC FORM 3X)

Name of Committee (in Full)
NATIONAL REPUBLICAN CANDIDATES COMMITTEE

Report Covering the Period: From: 11/25/80 To: 12/31/80

| | COLUMN A Total This Period | COLUMN B Calendar Year-to-Date |
|---|---|---|
| **I. RECEIPTS** | | |
| 11. CONTRIBUTIONS (other than loans) FROM: | | |
| (a) Individuals/Persons Other Than Political Committees | 6,897.81 | 17,011.31 |
| (Memo Entry Unitemized $ 6,897.81) | | |
| (b) Political Party Committees | | |
| (c) Other Political Committees | | |
| (d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c) | 6,897.81 | 17,011.31 |
| 12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES | | |
| 13. ALL LOANS RECEIVED | | |
| 14. LOAN REPAYMENTS RECEIVED | | |
| 15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.) | | |
| 16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES | | |
| 17. OTHER RECEIPTS (Dividends, Interest, etc.) | | |
| 18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17) | 6,897.81 | 17,011.31 |
| **II. DISBURSEMENTS** | | |
| 19. OPERATING EXPENDITURES | 5,997.21 | 6,103.52 |
| 20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES | | |
| 21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES | 5,000.00 | 5,000.00 |
| 22. INDEPENDENT EXPENDITURES (Use Schedule E) | | |
| 23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F) | | |
| 24. LOAN REPAYMENTS MADE | | |
| 25. LOANS MADE | | |
| 26. REFUNDS OF CONTRIBUTIONS TO: | | |
| (a) Individuals/Persons Other Than Political Committees | | |
| (b) Political Party Committees | | |
| (c) Other Political Committees | | |
| (d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c) | | |
| 27. OTHER DISBURSEMENTS | | |
| 28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27) | 10,997.21 | 11,103.52 |
| **III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES** | | |
| 29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d | 6,897.81 | 17,011.31 |
| 30. TOTAL CONTRIBUTION REFUNDS from Line 26d | | |
| 31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29) | 6,897.81 | 17,011.31 |
| 32. TOTAL OPERATING EXPENDITURES from Line 19 | 5,997.21 | 6,103.52 |
| 33. OFFSETS TO OPERATING EXPENDITURES from Line 15 | | |
| 34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32) | 5,997.21 | 6,103.52 |

SCHEDULE B

# ITEMIZED DISBURSEMENTS

Page 1 of 1 for
LINE NUMBER 19
(Use separate schedule(s) for each category of the Detailed Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)
NATIONAL REPUBLICAN CANDIDATES COMMITTEE

| Full Name, Mailing Address and ZIP Code | Purpose of Disbursement / Disbursement for | Date (month, day, year) | Amount of Each Disbursement This Period |
|---|---|---|---|
| A. Mark Winkler Management Co.<br>1900 N. Beauregard Street<br>Alexandria, Va. 22311 | Rental of office space<br>Disbursement for: ☐ Primary ☐ General ☒ Other (specify): 1980 | 12/01/80 | 275.00 |
| B. MediAmerica<br>1900 N. Beauregard Street<br>Alexandria, Va. 22311 | Payment of account payable<br>Disbursement for: ☐ Primary ☐ General ☒ Other (specify): 1980 | 12/01/80 | 4,500.00 |
| C. MediAmerica<br>1900 N. Beauregard Street<br>Alexandria, Va. 22311 | Reimbursement for supplies equip.rental,clerical and admin. services<br>Disbursement for: ☐ Primary ☐ General ☒ Other (specify): 1980 | 12/01/80 | 1,064.50 |
| D. C&P Telephone Co. of Virginia | Telephone<br>Disbursement for: ☐ Primary ☐ General ☒ Other (specify): 1980 | 12/29/80 | 83.09 |
| E. William P. Goldberg, Inc.<br>Washington, D. C. | Door sign<br>Disbursement for: ☐ Primary ☐ General ☒ Other (specify): 1980 | 12/29/80 | 74.62 |
| F. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| G. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| H. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| I. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| SUBTOTAL of Disbursements This Page (optional) | | | |
| TOTAL This Period (last page this line number only) | | | 5,997.21 |

**SCHEDULE B** **ITEMIZED DISBURSEMENTS**


(Use separate schedule(s) for each category of the Detailed Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)
NATIONAL REPUBLICAN CANDIDATES COMMITTEE

| A. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement / Disbursement for | Date (month, day, year) | Amount of Each Disbursement This Period |
|---|---|---|---|
| Symms for Senate<br>P. O. Box 471<br>Boise, Idaho 83701 | Contribution (Agg. 500.00)<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 12/29/80 | 500.00 |
| B. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement / Disbursement for | Date (month, day, year) | Amount of Each Disbursement This Period |
| Hawkins for Senate<br>P.O. Box 12637<br>Tallahassee, FL 32308 | Contribution (Aggr. 500.00)<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 12/29/80 | 500.00 |
| C. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement / Disbursement for | Date (month, day, year) | Amount of Each Disbursement This Period |
| McCollum for Congress<br>P. O. Box 732<br>Altamonte Springs, FL | Contribution (Aggr. 500.00)<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 12/29/80 | 500.00 |
| D. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement / Disbursement for | Date (month, day, year) | Amount of Each Disbursement This Period |
| Carman for Congress<br>266 Main Street<br>Farmington, N. Y. 11735 | Contribution (Aggr. 500.00)<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 12/29/80 | 500.00 |
| E. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement / Disbursement for | Date (month, day, year) | Amount of Each Disbursement This Period |
| Grassley for Senate<br>P. O. Box 1000<br>Des Moines, IA 50306 | Contribution (Aggr. 500.00)<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 12/29/80 | 500.00 |
| F. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement / Disbursement for | Date (month, day, year) | Amount of Each Disbursement This Period |
| Mattingly for Senate<br>P. O. Box 1980<br>Atlanta, GA 30301 | Contribution (Aggr. 500.00)<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 12/29/80 | 500.00 |
| G. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement / Disbursement for | Date (month, day, year) | Amount of Each Disbursement This Period |
| D'Amato for Senate<br>1697 Broadway<br>New York, N. Y. 10019 | Contribution (Aggr. 500.00)<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 12/29/80 | 500.00 |
| H. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement / Disbursement for | Date (month, day, year) | Amount of Each Disbursement This Period |
| Hunter for Congress<br>2309-1/2 National Avenue<br>San Diego, CA 92113 | Contribution (Aggr. 500.00)<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 12/29/80 | 500.00 |
| I. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement / Disbursement for | Date (month, day, year) | Amount of Each Disbursement This Period |
| Molinari for Congress<br>1720 Hylan Boulevard<br>Staten Island, N.Y. 10304 | Contribution (Aggr. 500.00)<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 12/29/80 | 500.00 |
| **SUBTOTAL** of Disbursements This Page (optional) | | | 4,500.00 |
| **TOTAL** This Period (last page this line number only) | | | |

**SCHEDULE B**

# ITEMIZED DISBURSEMENTS


(Use separate schedule(s) for each category of the Detailed Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)
NATIONAL REPUBLICAN CANDIDATES COMMITTEE

| | | | |
|---|---|---|---|
| A. Full Name, Mailing Address and ZIP Code<br>LeBoutillier for Cong<br>202 Winthrop<br>Westbury, N.Y. 11590 | Purpose of Disbursement<br>Contribution<br>(Aggr. 500.00)<br>Disbursement for: ☐ Primary X ☐ General<br>☐ Other (specify): | Date (month, day, year)<br>12/29/80 | Amount of Each Disbursement This Period<br>500.00 |
| B. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General<br>☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| C. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General<br>☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| D. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General<br>☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| E. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General<br>☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| F. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General<br>☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| G. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General<br>☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| H. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General<br>☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| I. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General<br>☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| **SUBTOTAL** of Disbursements This Page (optional) | | | 500.00 |
| **TOTAL** This Period (last page this line number only) | | | 5,000.00 |

**SCHEDULE D**
(Revised 3/80)

# DEBTS AND OBLIGATIONS
## Excluding Loans

Page 1 of 1 for
LINE NUMBER 10
(Use separate schedules for each numbered line)

Name of Committee (in Full)
NATIONAL REPUBLICAN CANDIDATES COMMITTEE

| | Outstanding Balance Beginning This Period | Amount Incurred This Period | Payment This Period | Outstanding Balance at Close of This Period |
|---|---|---|---|---|
| A. Full Name, Mailing Address and Zip Code of Debtor or Creditor<br>MEDIAMERICA<br>1900 N. Beauregard Street<br>Alexandria, Virginia 22311 | 9,305.92 | 10,608.10 | 5,564.50 | 14,349.52 |
| Nature of Debt (Purpose):<br>See statement attached. | | | | |
| B. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |
| C. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |
| D. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |
| E. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |
| F. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |

| | |
|---|---|
| 1) SUBTOTALS This Period This Page (optional) | |
| 2) TOTAL This Period (last page this line only) | 14,349.52 |
| 3) TOTAL OUTSTANDING LOANS from Schedule C (last page only) | |
| 4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only) | 14,349.52 |

Attachment to Schedule D of Report
of Receipts and Disbursements of
NATIONAL REPUBLICAN CANDIDATES COMMITTEE

Nature of Obligation Incurred this Period
to MediAmerica

| | | |
|---|---|---|
| Production and mailing services for solicitation mailed Dec. 5, 1980 | | $ 9,543.60 |
| Reimbursement of: | | |
| General clerical and administrative costs | $446.00 | |
| Accounting costs | 271.00 | |
| Rental of office equipment | 150.00 | |
| Xerox costs and supplies | 197.50 | 1,064.50 |
| TOTAL | | $10,608.10 |

9 3 0 4 0 4 3 5 6 4 1

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 998-0334

National Republicans Candidates
Committee
1900 N. Beauregard St., Ste. 12
Alexandria, VA. 22311

October 27, 1980

Job #0037 Invoice #758

Production and mailing services. Total count 8778 Urgent Grams. Drop date 10/25 & 10/26/80.

| | |
|---|---|
| Production: | |
| 8778 @ .50/each | $ 4,389.00 |
| Set-up | 10.00 |
| Printing: | |
| BRE #9 Blue (15K) | 569.82 |
| Carrier Window (15K) | 636.00 |
| Live stamp application | 50.00 |
| Stamp/Spoilage | 17.00 |
| Postage for 8778 | 2,633.40 |
| Total Due | $8,305.92 |
| Pd. | 3,500.00 |
| | 4,805.92 Bal. Due. |

All invoices are due and payable upon receipt. All charges are payable 20 days from date of invoice. A service charge of 1.5% per month (equivalent to 18% per year) will be added to past due items.

33040435644

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

November 18, 1980

National Republican
Candidates' Committee
1900 N. Beauregard St.
Alexandria, VA 22311

Invoice # 772

Reimbursement for services rendered by MediaAmerica for November, 1980.

| | |
|---|---|
| Secretarial Receptionist, General Office: | |
| J. Kanak (Caging/Batching/Zeroxing) work-up for stationery 17 hr at 5.49/hr. | $ 92.00 |
| B. Wheeler (Caging/Batching,verification 35 hr at 4.00/hr. | 140.00 |
| A. Gosain/Filing/general office 7 hr at 4.00/hr. | 28.00 |
| Keypunch & Verify Contributors List | 100.00 |
| Accounting: | |
| S. King (28 hrs at 8.24/hr.) Caging, Batching, Bank Deposits FEC report, Organizing Files. | 198.00 |
| Xerox Machine: Copies,Supplies. | 70.00 |
| IBM Typewriter, File Cabinet, Desk, Desk Chair. | 150.00 |
| Answering Telephone ($40/wk: 11-4-80/11-30-80) | 140.00 |
| Administrative (S. King 10 hrs at 8.24) Chart of Accounts/Opening Bank Accounts | 82.00 |
| TOTAL | $1,000.00 |

Paid

3 3 0 4 0 4 3 3 5 6 4 7

8 3 0 4 0 4 3 5 6 1 8

# MEDIAMERICA

Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

**INVOICE**
**000010**

All charges are payable 30 days from date of invoice. A SERVICE CHARGE of 1.5% per month (equivalent to 18% per year) will be added to past due items.

National Republican Candidates Committee
1900 North Beauregard Street, #12
Alexandria, Virginia 22311

| Account Number |
|---|
| |

Job #0090

PURCHASE ORDER NO.

Please Send One Copy With Remittance

| DATE | INVOICE NUMBER | DESCRIPTION | AMOUNT |
|---|---|---|---|
| 12/12/80 | | Composition/Production of 12,245 UrgentGrams. | |
| | | Drop date - December 5, 1980. | |
| | | -Copy Creative Fee | $ 1,000.00 |
| | | -UrgentGram @ .50/unit | 6,122.50 |
| | | -Printing - Envelopes | 584.35 |
| | | 20K Blue Wove Black Ink | |
| | | -Postage (.15 each) | 1,836.75 |
| | | TOTAL DUE | $ 9,543.60 |
| | | Paid on Account 1/10/81 - Ck. #116 | 2,000.00 |
| | | BALANCE DUE | $ 7,543.60 |

Claims for defects, damages or shortages must be made in writing within a period of ten (10) days after delivery.

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

November 26, 1980

National Republican
Candidates' Committee
1900 N. Beauregard St.
Alexandria, VA 22311

Invoice # 776

Reimbursement of services rendered by MediaAmerica for December, 1980.

| | |
|---|---|
| **Secretarial Receptionist:** | |
| Answering telephone(40/week:12/1-12/31) | $ 160.00 |
| Anita Gosain-general office-set-up files (37.5 hr x 4) | 150.00 |
| Filing at 4hr x 4.00 | 16.00 |
| **Supplies:** | |
| 5 Boxes file folders at($15/each) | 75.00 |
| 2 Boxes letter size folders($12/each) | 24.00 |
| 3 Packages of red tabs($3/each) | 9.00 |
| 1 Package of white tabs | 1.50 |
| 1 Accounting check holder | 18.00 |
| **Keypunch**: Contributors and verify | 120.00 |
| **Xerox Machine**: Copies and supplies | 70.00 |
| **IBM Typewriter,** File Cabinet, Desk & Desk Chair | 150.00 |
| **Accounting & General Office:** | |
| S. King (8.24 x 33 hours) | |
| FEC Report | |
| Caging and batching | |
| Bank deposits | 271.00 |
| TOTAL | $ 1,064.50 |

Paid —

33040435641

8 3 0 4 0 4 3 5 6 5 0

**SEDAM & HERGE, P.C.**
ATTORNEYS AT LAW
7600 OLD SPRINGHOUSE ROAD
McLEAN, VIRGINIA 22102

***To:***

Honorable Charles N. Steele
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463
Attention: Steve Mimms, Esquire

**FIRST CLASS MAIL**

GCC#4029


SEDAM & HERGE
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
7600 OLD SPRINGHOUSE ROAD
McLEAN, VIRGINIA 22102

(703) 821-1000

GLENN J. SEDAM, JR.
J. CURTIS HERGE

ROBERT R. SPARKS, JR.
MICHAEL D. HUGHES
A. MARK CHRISTOPHER
KAREN LUSSEN BLAIR
JOHN ROBERT CLARK III
J. STANLEY PAYNE, JR.

1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(202) 393-7124

TWX/TELEX: 710-831-0896

CABLE: SEDAMHERGE


February 19, 1981


RECEIVED
GENERAL COUNSEL
1 FEB 23 P3:41


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

Attention: Steve Mims, Esq.

Re: MUR 1363

Dear Mr. Steele:

This letter is written on behalf of our client, National Republican Candidates' Committee, with respect to the above-captioned matter, to request an extension of time until Wednesday, February 25, 1981 for the purpose of submitting an initial response to the complaint.

This proposed extension is required because of the number of respondents named in the complaint and the need to accumulate and analyze factual data relevant to the matter.

Sincerely,

J. Curtis Herge

SEDAM & HERGE
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
7600 OLD SPRINGHOUSE ROAD
McLEAN, VIRGINIA 22102

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

Attention: Steve Mims, Esq.

8 3 0 1 0 4 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 18, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Karen E. Dent
4608 North 26th Street
Arlington, Virginia 22207

Re: MUR 1363

Dear Ms. Dent:

This letter is to notify you that on January 16, 1981, the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1363. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your Committee in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

8 3 0 4 0 4 3 5 6 5 7

If you have any questions, please contact Stephen Mims, the staff member assigned to this matter at 202-523-4060. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

1. Complaint
2. Procedures

3304043565

SEDAM & HERGE
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
7600 OLD SPRINGHOUSE ROAD
McLEAN, VIRGINIA 22102

830103

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

913199

CCC

81 FEB 17 P1:40

3995


SEDAM & HERGE
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
7600 OLD SPRINGHOUSE ROAD
McLEAN, VIRGINIA 22102

(703) 821-1000

GLENN J. SEDAM, JR.
J. CURTIS HERGE

ROBERT R. SPARKS, JR.
MICHAEL D. HUGHES
A. MARK CHRISTOPHER
KAREN LUSSEN BLAIR
JOHN ROBERT CLARK III
J. STANLEY PAYNE, JR.

1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(202) 393-7124

TWX/TELEX: 710-831-0696

CABLE: SEDAMHERGE


February 13, 1981

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

Attention: Steve Mims, Esq.

Re: MUR 1363

81 FEB 17 P3:29

Dear Mr. Steele:

This letter is written on behalf of our client, National Republican Candidates' Committee, with reference to your letters, dated January 30, 1981, addressed to MediAmerica, Inc.; Mr. John D. Romanin; Mr. K. E. Dent; National Republican Candidates' Committee; and, Mr. Richard Geske, respectively, at 1900 N. Beauregard Street, Alexandria, Virginia 22311.

While receipt of the letter addressed to Mr. K. E. Dent was apparently acknowledged on February 3, 1981, together with the other four letters, that letter was accepted inadvertantly. K. E. Dent (whose full name is Ms. Karen E. Dent can, upon information and belief, be reached at 4608 North 26th Street, Arlington, Virginia 22207.

Sincerely,

J. Curtis Herge

J. Curtis Herge

912028

GCC #3917

RECEIVED

81 FEB 5 AM : 44

# National Republican Candidates' Committee

1900 N. BEAUREGARD STREET • ALEXANDRIA, VA. 22311

February 4, 1981

Charles N. Steele, Esq.
General Counsel
Steve Mims, Esq.
Assistant to General Counsel
Federal Election Commission
Washington, D. C. 20463

Letter of Representation
REF: MUR 1363

Gentlemen:

In response to your letter dated January 30, 1981, the National Republican Candidates Committee (FEC ID# C00130682) herein authorizes the following Counsel:

J. Curtis Herge
Sedam & Herge
7600 Old Springhouse Road
McLean, Virginia 22102
703/821-1000

Mr. Herge is authorized to receive any notifications and/or other communication from the Federal Election Commission concerning MUR 1363.

Sincerely,

S. King

S. King,
Treasurer

SK:cp

PAID FOR BY THE NATIONAL REPUBLICAN CANDIDATES COMMITTEE;
NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATES COMMITTEE.

National Republican Candidates' Committee
BEAUREGARD STREET • ALEXANDRIA, VA. 22311

Charles N. Steele, Esq.
General Counsel
Steve Mims, Esq.
Assistant to General Counsel
Federal Election Commission
Washington, D. C. 20463

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business
Penalty for Private Use, $300

POSTAGE AND FEES PAID

UNCLAIMED

Ms. Karen E. Dent
4608 North 26th Street
Arlington, Virginia 22207

CERTIFIED
948210

8 Received 3-12-81 0 6 0

Awaiting mail
to file

1. The following service is requested (check one)

☐ Show to whom and date delivered

☐ Show to whom, date and address of delivery

☐ RESTRICTED DELIVERY

Show to whom and date delivered

☐ RESTRICTED DELIVERY.

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

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

Karen E. Dent
4608 N. 26th St.
Arlington, VA 22207

3. ARTICLE NUMBER

REGISTERED NO. | CERTIFIED NO. | INSURED NO.

P 326 [illegible]

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

4. DATE OF DELIVERY

5. ADDRESSEE'S ADDRESS (only if requested)

6. UNABLE TO DELIVER BECAUSE:

UNCLAIMED

RETURN RECEIPT, 3-12-81

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 30, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John D. Romanin
1900 N. Beauregard St., #12, Bldg. 5
Alexandria, Virginia 22311

Re: MUR 1363

Dear Mr. Romanin:

This letter is to notify you that on January 16, 1981, the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1363. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your Committee in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

8 3 0 4 0 4 3 5 6 5 1

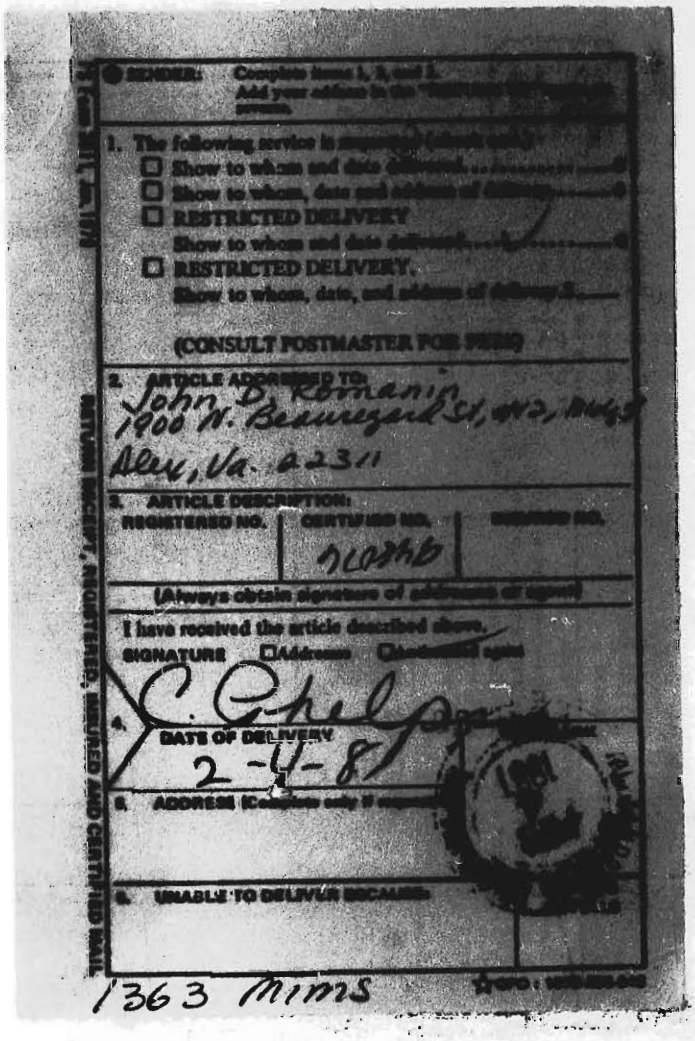
If you have any questions, please contact Steve Mims, the staff member assigned to this matter at (202) 523-4060. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

Enclosures

1. Complaint
2. Procedures


SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse side.
1. The following service is requested (check one)
Show to whom and date delivered
Show to whom, date and address of delivery
RESTRICTED DELIVERY
Show to whom and date delivered
RESTRICTED DELIVERY
Show to whom, date, and address of delivery
(CONSULT POSTMASTER FOR FEES)
2. ARTICLE ADDRESSED TO:
John D. Romanin
1900 N. Beauregard St, #43, Bldg 5
Alex, Va. 22311
3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. 7103745 | INSURED NO.
(Always obtain signature of addressee or agent)
I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
C. Steele
4. DATE OF DELIVERY
2-4-8
5. ADDRESS (Complete only if requested)
6. UNABLE TO DELIVER BECAUSE:
1363 Mims

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 30, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Richard Geske
1900 N. Beauregard St., #12, Bldg. 5
Alexandria, Virginia 22311

Re: MUR 1363

Dear Mr. Geske:

This letter is to notify you that on January 16, 1981, the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1363. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your Committee in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

3 3 0 4 0 4 3 5 5 6 5 3

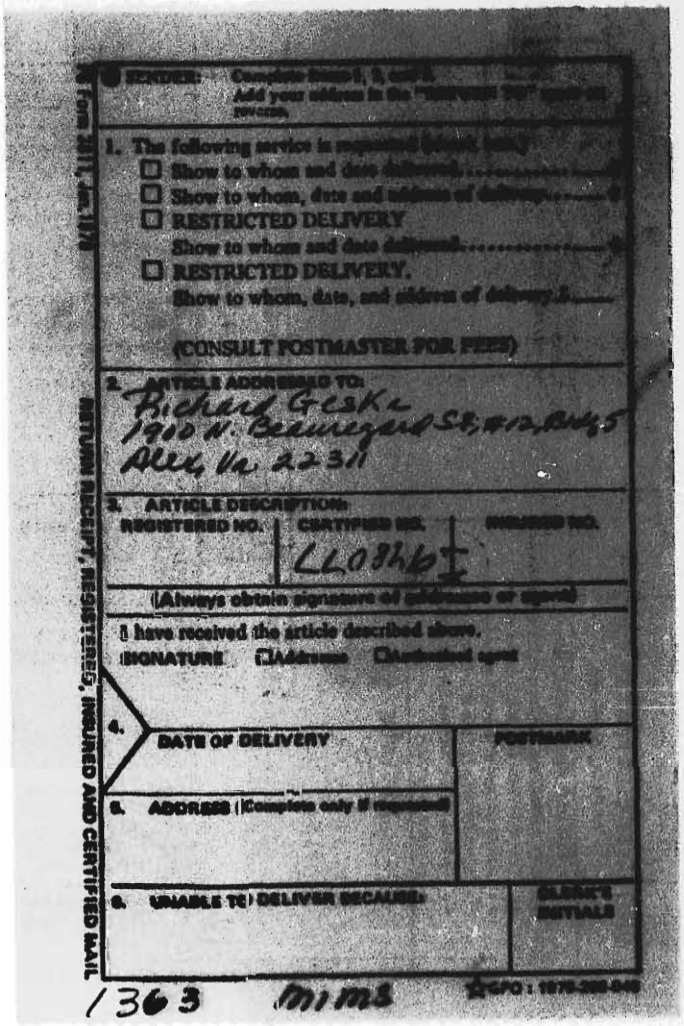
If you have any questions, please contact Steve Mims, the staff member assigned to this matter at (202) 523-4060. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

Enclosures

1. Complaint
2. Procedures



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 30, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MediaAmerica, Inc.
1900 N. Beauregard St., #12, Bldg. 5
Alexandria, Virginia 22311

Re: MUR 1363

Dear Sir or Madam:

This letter is to notify you that on January 16, 1981, the Federal Election Commission received a complaint which alleges that your Committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1363. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your Committee in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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

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8 3 0 4 0 1 3 5 6 5 3

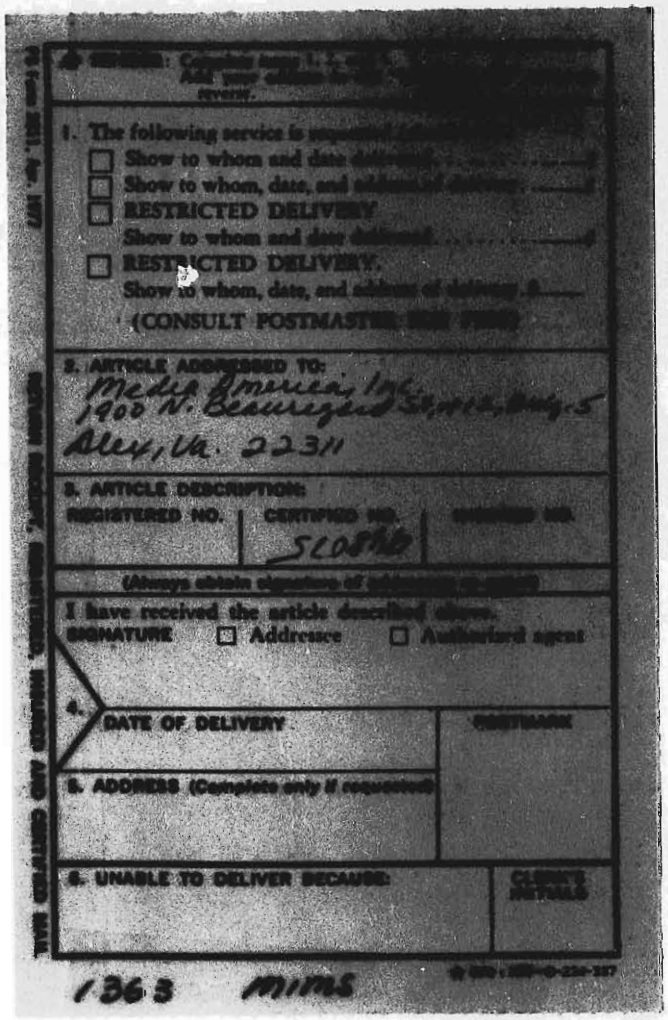
If you have any questions, please contact Steve Mims, the staff member assigned to this matter at (202) 523-4060. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

Enclosures

1. Complaint
2. Procedures


1. The following service is requested
Show to whom and date
Show to whom, date, and address
RESTRICTED DELIVERY
Show to whom and date
RESTRICTED DELIVERY
Show to whom, date, and address
(CONSULT POSTMASTER
2. ARTICLE ADDRESSED TO:
Media America Inc
1900 N. Beauregard St, #12, Bldg-5
Alex, Va 22311
3. ARTICLE DESCRIPTION:
REGISTERED NO.
CERTIFIED NO.
5L08
I have received the article described above.
SIGNATURE
Addressee
Authorized agent
4. DATE OF DELIVERY
POSTMARK
5. ADDRESS (Complete only if requested)
6. UNABLE TO DELIVER BECAUSE:
CLERK'S INITIALS
1363 MIMS

8304013565

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 30, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. K. E. Dent
1900 N. Beauregard St., #12, Bldg. 5
Alexandria, Virginia 22311

Re: MUR 1363

Dear Mr. Dent:

This letter is to notify you that on January 16, 1981, the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1363 Please refer to this number in all future correspondence.

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8 3 0 4 0 4 3 5 6 5 7

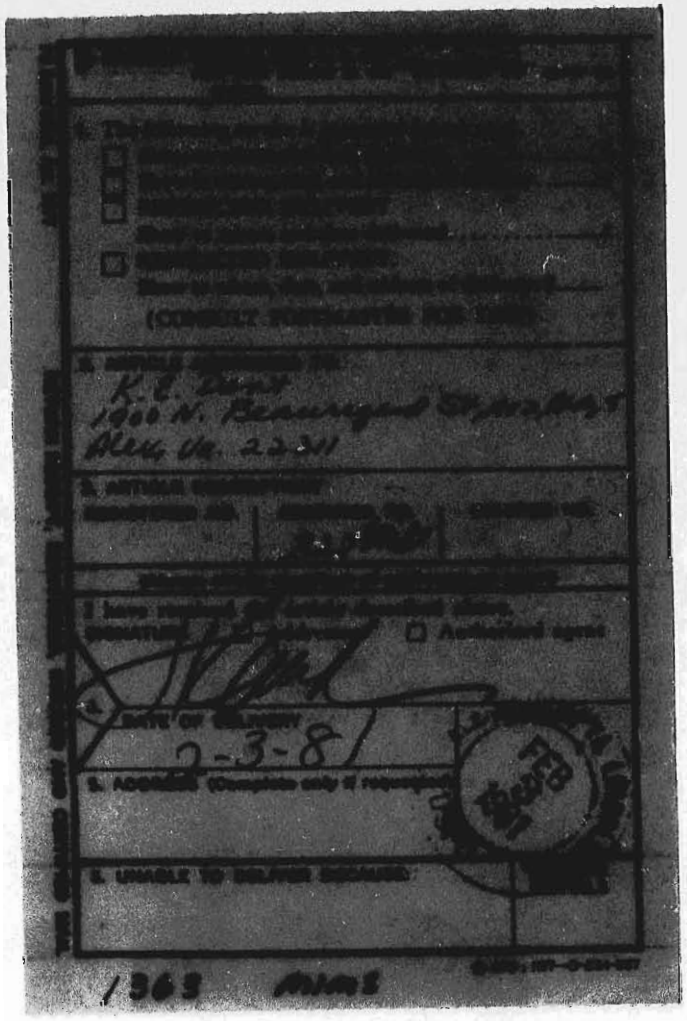
If you have any questions, please contact Steve Mims, the staff member assigned to this matter at (202) 523-4060. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

Enclosures

1. Complaint
2. Procedures




8304013556

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 30, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

National Republican Candidates
Committee
K. E. Dent, Treasurer
1900 N. Beauregard St., #12, Bldg. 5
Alexandria, Virginia 22311

Re: MUR 1363

Dear Mr. Dent:

This letter is to notify you that on January 16, 1981, the Federal Election Commission received a complaint which alleges that your Committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1363. Please refer to this number in all future correspondence.

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

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

8 3 0 4 0 1 3 5 6 5

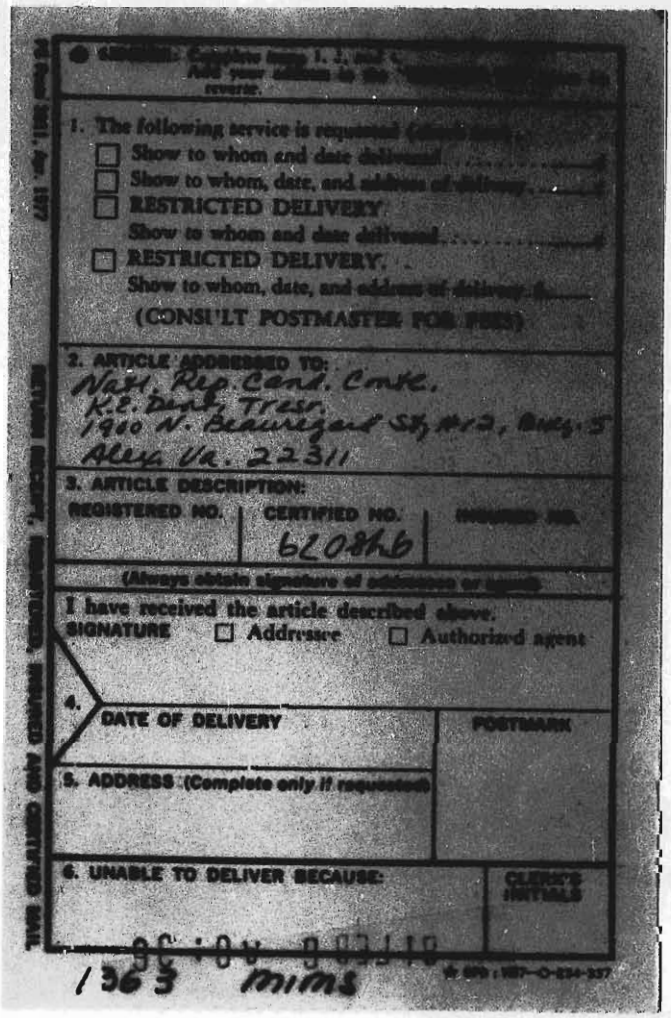
If you have any questions, please contact Steve Mims, the staff member assigned to this matter at (202) 523-4060. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

Enclosures

1. Complaint
2. Procedures



PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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

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

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Donald L. Ivers
RNC
310 First St SE.
Wash, DC 20003

3. ARTICLE DESCRIPTION:

| REGISTERED NO. | CERTIFIED NO. | INSURED NO. |
|---|---|---|
| | e 208460 | |

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Don Ivers by jmd

4. DATE OF DELIVERY
2/3/81

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GPO : 1977—O-234-337

1363 MIMS

B 3 0 4 0 4 3 5 5 7 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 30, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Donald L. Ivers
House Counsel
Republican National Committee
310 First Street, S. E.
Washington, D. C. 20003

Dear Mr. Ivers:

This letter is to acknowledge receipt of your complaint of January 15, 1981, against the National Republican Candidates Committee, K. E. Dent, Media-America, Inc., Richard Geske, and John D. Romanin which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondents will be notified of this complaint within 5 days and a recommendation to the Federal Election Commission as to how this matter should be initially handled will be made 15 days after the respondents' notification. You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this office. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

8 3 0 4 0 4 3 5 6 7 2

PS Form 3811, Jan. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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

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

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Mark E. Goldhaber
NRCC
320 First St, S.E.
Wash, DC 20003

3. ARTICLE DESCRIPTION:

| REGISTERED NO. | CERTIFIED NO. | INSURED NO. |
|---|---|---|
| | 080860 | |

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
FEB 4 1981

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

WASH, DC SOUTHWEST STA POSTMASTER USPO FEB 4 1981

1363 mms

☆GPO : 1979-289-848

830404356 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 30, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Mark E. Goldhaber
Assistant Legal Counsel
National Republican Congressional
Committee
320 First Street, S. E.
Washington, D. C. 20003

Dear Mr. Goldhaber:

This letter is to acknowledge receipt of your complaint of January 15, 1981, against the National Republican Candidates Committee, K. E. Dent, Media-America, Inc., Richard Geske, and John D. Romanin which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondents will be notified of this complaint within 5 days and a recommendation to the Federal Election Commission as to how this matter should be initially handled will be made 15 days after the respondents' notification. You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this office. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

8 3 0 4 0 4 3 5 6 7

PS Form 3811, Jan. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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

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

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
James F. Schoener
NRSC
227 Mass Ave, N.E.
Wash, DC 20002

3. ARTICLE DESCRIPTION:

| REGISTERED NO. | CERTIFIED NO. | INSURED NO. |
|---|---|---|
| | 180846 | |

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
2-4-81

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

1363 mims

☆GPO : 1979-289-848

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 30, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James F. Schoener
Legal Counsel
National Republican Senatorial
Committee
227 Massachusetts Avenue, N.E.
Washington, D. C. 20002

Dear Mr. Schoener:

This letter is to acknowledge receipt of your complaint of January 15, 1981, against the National Republican Candidates Committee, K. E. Dent, Media-America, Inc., Richard Geske, and John D. Romanin which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondents will be notified of this complaint within 5 days and a recommendation to the Federal Election Commission as to how this matter should be initially handled will be made 15 days after the respondents' notification. You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this office. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James F. Schoener
Legal Counsel
National Republican Senatorial
Committee
227 Massachusetts Avenue, N.E.
Washington, D. C. 20002

Dear Mr. Schoener:

This letter is to acknowledge receipt of your complaint of January 15, 1981, against the National Republican Candidates Committee, K. E. Dent, Media-America, Inc., Richard Geske, and John D. Romanin which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondents will be notified of this complaint within 5 days and a recommendation to the Federal Election Commission as to how this matter should be initially handled will be made 15 days after the respondents' notification. You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this office. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

pakayson:1-29-81

8 3 0 4 0 4 3 5 6 7 7

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Mark E. Goldhaber
Assistant Legal Counsel
National Republican Congressional
Committee
320 First Street, S. E.
Washington, D. C. 20003

Dear Mr. Goldhaber:

This letter is to acknowledge receipt of your complaint of January 15, 1981, against the National Republican Candidates Committee, K. E. Dent, Media-America, Inc., Richard Geske, and John D. Romanin which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondents will be notified of this complaint within 5 days and a recommendation to the Federal Election Commission as to how this matter should be initially handled will be made 15 days after the respondents' notification. You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this office. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

pakayson:1-29-81

3 3 0 4 0 4 2 3 5 6 7 8

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Donald L. Ivers
House Counsel
Republican National Committee
310 First Street, S. E.
Washington, D. C. 20003

Dear Mr. Ivers:

This letter is to acknowledge receipt of your complaint of January 15, 1981, against the National Republican Candidates Committee, K. E. Dent, Media-America, Inc., Richard Geske, and John D. Romanin which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondents will be notified of this complaint within 5 days and a recommendation to the Federal Election Commission as to how this matter should be initially handled will be made 15 days after the respondents' notification. You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this office. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

pakayson:1-29-81

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MUR # 1363 mlms

DATE January 29, 1981

PLEASE PROVIDE THE NAMES AND ADDRESSES OF ALL RESPONDENTS WHICH ARE TO BE SENT A COPY OF THE COMPLAINT. IF A PRINCIPAL CAMPAIGN COMMITTEE IS A RESPONDENT, A CARBON COPY IS TO BE SENT TO THE CANDIDATE. PLEASE PROVIDE THE NAME AND ADDRESS OF THE CANDIDATE AND PUT A "CC" BESIDE THE CANDIDATE'S NAME. IF A CANDIDATE IS A RESPONDENT, A CARBON COPY IS TO BE SENT TO THE CANDIDATE'S PRINCIPAL CAMPAIGN COMMITTEE. PLEASE PROVIDE THE NAME AND ADDRESS OF THE PRINCIPAL CAMPAIGN COMMITTEE AND PUT A "CC" BESIDE THE COMMITTEE'S NAME. PLEASE PROVIDE THIS INFORMATION, ON THIS SHEET, WITHIN 24 HOURS OF RECEIPT OF THIS NOTICE. THANK YOU.

Complainants:

1. Donald L. Ivers
   House Counsel
   Republican National Committee
   310 First Street, S.E.
   Washington, D.C. 20003

2. Mark E. Goldhaber
   Assistant Legal Counsel
   National Republican Congressional Committee
   320 First Street, S.E.
   Washington, D.C. 20003

3. James F. Schoener
   Legal Counsel
   National Republican Senatorial Committee
   227 Massachusetts Avenue, N.E.
   Washington, D.C. 20002

Respondents

1. National Republican Candidates Committee
   K.E. Dent, Treasurer
   1900 N. Beauregard St., #12, Bldg. 5
   Alexandria, Virginia 22311

2. K.E. Dent
   1900 N. Beauregard St., #12, Bldg. 5
   Alexandria, Virginia 22311

(over)

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**Respondents (continued)**

3. **MediaAmerica, Inc.**
   **1900 N. Beauregard St., #12, Bldg 5**
   **Alexandria, Virginia 22311**

4. **Richard Geske**
   **1900 N. Beauregard St., #12, Bldg. 5**
   **Alexandria, Virginia 22311**

5. **John D. Romanin**
   **1900 N. Beuaregard St., #12, Bldg. 5**
   **Alexandria, Virginia 22311**

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OCC# 3767

91188

RECEIVED

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January 15, 1981

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

Dear Mr. Steele:

Enclosed is a signed and sworn to complaint filed by the undersigned against the National Republican Candidates Committee, MediAmerica, Inc., K. E. Dent, Richard Geske and John D. Romanin. Please process this complaint promptly pursuant to 11 C.F.R. §111.5.

Donald L. Ivers
House Counsel
Republican National Committee
310 First Street, S. E.
Washington, D. C. 20003

Mark E. Goldhaber
Assistant Legal Counsel
National Republican Congressional Committee
320 First Street, S. E.
Washington, D. C. 20003

James F. Schoener
Legal Counsel
National Republican Senatorial Committee
227 Massachusetts Avenue, N.E.
Washington, D. C. 20002

80041756

81 JAN 16 P3:50

BEFORE THE FEDERAL ELECTION COMMISSION
UNITED STATES OF AMERICA

| | |
|---|---|
| In Re NATIONAL REPUBLICAN CANDIDATES COMMITTEE, K.E. DENT, MEDIAMERICA, INC., RICHARD GESKE, and JOHN D. ROMANIN | Matter Under Review ____ |

COMPLAINT

1. The undersigned hereby file and verify the instant complaint against:

(a) the National Republican Candidates Committee ("Committee"), a political committee registered with the Federal Election Commission ("FEC");

(b) K.E. Dent ("Dent"), treasurer of the Committee;

(c) MediAmerica, Inc. ("MediAmerica"), a Virginia corporation;

(d) Richard Geske ("Geske"), chairman of the Committee and president of MediAmerica;

(e) John D. Romanin ("Romanin"), treasurer of MediAmerica and an officer of the Committee.

2. The business address of the above-mentioned persons is 1900 North Beauregard Street, Suite 12, Alexandria, Virginia 22311.

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3. Complainants aver that the Committee is not a national Republican party committee nor is it affiliated with any national Republican party committee.

4. Upon information and belief, the Committee is not an independent political committee but a separate, segregated fund established and administered by MediAmerica, 2 U.S.C. §441b(b)(2)(C). MediAmerica is the connected organization of the Committee because it directly or indirectly established, and presently administers and financially supports, the Committee. 11 C.F.R. §100.6.

5. The Committee is not an independent committee but a separate, segregated fund of its connected organization MediAmerica for the following reasons [see Advisory Opinions 1975-143 and 1977-2]:

(a) Upon information and belief, the Committee and MediAmerica are controlled by the same individuals, namely Geske and Romanin. See Exhibits 1-3.

(b) The facilities of MediAmerica are used by the Committee. See Exhibits 2-5.

(c) The activities of the Committee have been subsidized almost totally by MediAmerica. See Exhibit 3.

(d) The telephone response number listed in a solicitation for contributions mailed to potential contributors by the Committee is the tele-

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phone number of MediAmerica. See Exhibit 5.

(e) A report filed with the Federal Election Commission by the Committee is written on MediAmerica stationery and signed by Shirley King, an accountant/office manager of MediAmerica. See Exhibit 6.

COUNT I

Violations of the Federal Election Laws by the Committee

6. The Committee in its statement of organization failed to list MediAmerica as its connected organization in violation of 2 U.S.C. §433(b)(2). See Exhibit 4.

7. The Committee failed to include in its name the name of MediAmerica, its connected organization, in violation of 2 U.S.C. §432(e)(5). See Exhibit 4.

8. Upon information and belief, the Committee solicited contributions from individuals other than executive or administrative personnel and their families or shareholders and their families of MediAmerica in violation of 2 U.S.C. §441b(b)(4)(i). See Exhibit 5.

9. The Committee filed reports with the FEC which were signed by an individual other than the Committee's treasurer, Dent, in violation of 2 U.S.C. §434(a)(1). See Exhibits 2-3, 6.

10. Upon information and belief, the Committee failed to state on a written communication soliciting contributions the identity of the person who paid for the communication and that the communication was not authorized by any candidate or candidate's committee in violation of 2 U.S.C. §441d(a)(3). See Exhibit 5.

COUNT 2

Violations of the Federal Election Laws by Dent

11. Dent failed to sign reports filed by the Committee with the FEC in violation of 2 U.S.C. §434(a)(1). See Exhibits 2-3, 6.

12. Dent, on behalf of the Committee, failed to file with the FEC a statement of organization listing MediAmerica as the Committee's connected organization in violation of 2 U.S.C. §433(b)(2). See Exhibit 4.

COUNT 3

Violations of the Federal Election Laws by MediAmerica

13. If MediAmerica is not the connected organization of the Committee, then upon information and belief MediAmerica financed the activities of the Committee by means of subsidizing the Committee's overhead and clerical expenses and extending credit for the rental of mailing lists in violation of 2 U.S.C. §441b(a). See Exhibit 3.

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## COUNT 4

### Violations of the Federal Election Laws by Geske

14. If MediAmerica is not the connected organization of the Committee, then upon information and belief Geske, an officer and director of MediAmerica, consented to the financing by MediAmerica of the activities of the Committee by means of subsidizing the Committee's overhead and clerical expenses and extending credit for the rental of mailing lists in violation of 2 U.S.C. §441b(a). See Exhibits 1, 3.

## COUNT 5

### Violations of the Federal Election Laws by Romanin

15. If Romanin is not the treasurer of the Committee, he signed and submitted to the FEC the Committee's October 15 Quarterly Report and Post-Election Report falsely stating that he is the treasurer in violation of 18 U.S.C. §1001. See Exhibits 2-3.

16. If Romanin is the treasurer of the Committee, he failed to amend the Committee's statement of organization to reflect the fact that he, and not Dent, is the treasurer of the Committee in violation of 2 U.S.C. §433(c). See Exhibits 2-4.

17. If Romanin is the treasurer of the Committee, he failed to report on the Committee's statement of organization that MediAmerica is the Committee's connected organization in violation of 2 U.S.C. §433(b)(2). See Exhibit 4.

**COUNT 6**

Knowing and Willful Violations of the Federal Election Laws by the Committee, Dent, MediAmerica, Geske and Romanin

18. Upon information and belief the above-mentioned actions by the Committee, Dent, MediAmerica, Geske and Romanin constitute knowing and willful violations of the federal election laws requiring an immediate referral of such violations by the FEC to the Attorney General of the United States pursuant to 2 U.S.C. §437g(a)(5)(c).

Donald L. Ivers
House Counsel
Republican National Committee
310 First Street, S.E.
Washington, D. C. 20003

Subscribed and sworn to before me this 15th day of January, 1981.

Notary Public

My Commission Expires August 31, 1985

Mark E. Goldhaber
Assistant Legal Counsel
National Republican Congressional Committee
320 First Street, S. E.
Washington, D. C. 20003

Subscribed and sworn to before me this 15th day of January, 1981.

Denise Cw
Notary Public

My Commission Expires August 31, 1985

James A. Schoener
James A. Schoener
Legal Counsel
National Republican Senatorial Committee
227 Massachusetts Avenue, N.E.
Washington, D.C. 20002

Subscribed and sworn to before me this 15th day of January, 1981.

Denise Cw
Notary Public

My Commission Expires August 31, 1985

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EXHIBIT I

AFFIDAVIT

OF

E. MARK BRADEN

I, E. Mark Braden, Deputy House Counsel for the Republican National Committee, do hereby on oath, depose and state as follows:

1. Upon information and belief MEDIAMERICA, INC. is a Virginia corporation, incorporated 4/21/78, Charter #184302. Its stated purpose for advertising and public relations.

2. Upon information and belief J. Curtis Herge is the incorporator. The Directors are listed as: Dennis M. Davis, III; Michael D. Hughes: and J. Curtis Herge.

3. Upon information and belief Virginia State Corporation records also show current officers as follows:

1) D. Richard Geske, President and Director
2) Maiselle Shortley, Vice President and Director
3) Rhonda K. Stahlman, Secretary
4) Terry Lenehan, Assistant Secretary
5) John D. Romanin, Treasurer

E. Mark Braden

E. Mark Braden
Republican National Committee
310 First Street, SE
Washington, DC 20003

District of Columbia:

Subscribed and sworn to before me this 15th day of June, 1981.

Philip A. Guarino
Notary Public

My commission expires: MY COMMISSION EXPIRES JUNE 15, 1981

RECEIVED

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

(Summary Page)

80 DEC 8 [illegible] 29

1. Name of Committee (In Full)

NATIONAL REPUBLICAN CANDIDATES COMMITTEE

Address (Number and Street)

1900 N. Beauregard Street #12

City, State and ZIP Code

Alexandria, Virginia 22311

☐ Check if address is different than previously reported.

2. FEC Identification Number

C00130682

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a)
- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☒ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Monthly Report for _____
- ☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
- ☐ Thirtieth day report following the General Election on _____ in the State of _____
- ☐ Termination Report

(b) Is this Report an Amendment? ☐ YES ☐ NO

| SUMMARY | Column A This Period | Column B Calendar Year-to-Date |
|---|---|---|
| 5. Covering Period 7-1-80 Through 9-30-80 | | |
| 6. (a) Cash on Hand January 1, 19__ N/A | | $ |
| (b) Cash on Hand at Beginning of Reporting Period | $ N/A | |
| (c) Total Receipts (from Line 18) | $ 300.00 | $ |
| (d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B) | $ 300.00 | $ 300.00 |
| 7. Total Disbursements (from Line 29) | $ — | $ — |
| 8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) | $ 300.00 | $ 300.00 |
| 9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D) | $ — | |
| 10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D) | $ — | |

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

For further information, contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

John D. Ronzetti
Type or Print Name of Treasurer

Signature of Treasurer — Date 12-1-80

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | | | | | | | |

FEC FORM 3X (3/80)

EXHIBIT 2

# DETAILED SUMMARY PAGE
of Receipts and Disbursements
FEC FORM 3X

Name of Committee (In Full): NATIONAL REPUBLICAN CANDIDATES COMMITTEE

Report Covering the Period: From 7-1-80 To 9-30-80

| | COLUMN A Total This Period | COLUMN B Calendar Year-to-Date |
|---|---|---|
| **I. RECEIPTS** | | |
| 11. CONTRIBUTIONS (other than loans) FROM: | | |
| (a) Individuals/Persons Other Than Political Committees | 300.00 | 300.00 |
| (b) Political Party Committees | — | — |
| (c) Other Political Committees | — | — |
| (d) TOTAL CONTRIBUTIONS (other than loans) (Add 11a, 11b and 11c) | 300.00 | 300.00 |
| 12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES | — | — |
| 13. ALL LOANS RECEIVED | — | — |
| 14. LOAN REPAYMENTS RECEIVED | — | — |
| 15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.) | — | — |
| 16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES | — | — |
| 17. OTHER RECEIPTS (Dividends, Interest, etc.) | — | — |
| 18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17) | 300.00 | 300.00 |
| **II. DISBURSEMENTS** | | |
| 19. OPERATING EXPENDITURES | — | — |
| 20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES | — | — |
| 21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES | — | — |
| 22. INDEPENDENT EXPENDITURES (Also Schedule E) | — | — |
| 23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Also Schedule F) | — | — |
| 24. LOAN REPAYMENTS MADE | — | — |
| 25. LOANS MADE | — | — |
| 26. REFUNDS OF CONTRIBUTIONS TO: | | |
| (a) Individuals/Persons Other Than Political Committees | — | — |
| (b) Political Party Committees | — | — |
| (c) Other Political Committees | — | — |
| (d) TOTAL CONTRIBUTION REFUNDS (Add 26a, 26b and 26c) | — | — |
| 27. OTHER DISBURSEMENTS | — | — |
| 28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27) | — | — |
| **III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES** | | |
| 29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d | 300.00 | 300.00 |
| 30. TOTAL CONTRIBUTION REFUNDS from Line 26d | — | — |
| 31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29) | 300.00 | 300.00 |
| 32. TOTAL OPERATING EXPENDITURES from Line 19 | — | — |
| 33. OFFSETS TO OPERATING EXPENDITURES from Line 15 | — | — |
| 34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32) | — | — |

8 3 0 4 0 4 3 3 6 9 2

# REPORT OF RECEIPTS AND DISBURSEMENTS
## For a Political Committee Other Than an Authorized Committee

### Summary Page

1. Name of Committee (in Full)

NATIONAL REPUBLICAN CANDIDATES COMMITTEE

Address (Number and Street)

1900 N. Beauregard Street #12

City, State and ZIP Code

Alexandria, Virginia 22311

☐ Check if address is different than previously reported.

2. FEC Identification Number
C00130682

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a)
- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Monthly Report for _____
- ☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
- ☐ Thirtieth day report following the General Election on _____ in the State of _____
- ☐ Termination Report

(b) Is this Report an Amendment? ☐ YES ☒ NO

| SUMMARY | Column A This Period | Column B Calendar Year-to-Date |
|---|---|---|
| 5. Covering Period 10-1-80 Through 11-24-80 | | |
| 6. (a) Cash on Hand January 1, 19__ | | $ 300.00 |
| (b) Cash on Hand at Beginning of Reporting Period | $ 300.00 | |
| (c) Total Receipts (from Line 16) | $ 9813.00 | $ 9813.00 |
| (d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B) | $10,113.50 | $10,113.50 |
| 7. Total Disbursements (from Line 28) | $ 106.31 | $ 106.31 |
| 8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) | $10,007.19 | $10,007.19 |
| 9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D) | $ — | |
| 10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D) | $ 9,305.92 | |

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

For further information, contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

John [illegible]
Type or Print Name of Treasurer

[illegible]
Signature of Treasurer

12/3/80
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

FEC FORM 3X (3/80)

EXHIBIT 3

## DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3X)

Name of Committee (In Full): NATIONAL [illegible]

Report Covering the Period: From 10-1-90 To 11-26-90

| | COLUMN A Year-to-Date | COLUMN B Calendar Year |
|---|---|---|
| **I. RECEIPTS** | | |
| 11. CONTRIBUTIONS (other than loans) | | |
| (a) Individuals/Persons Other Than Political Committees | 9813.50 | 10113.50 |
| Memo Entry Unitemized $ _____ | — | — |
| (b) Political Party Committees | — | — |
| (c) Other Political Committees | — | — |
| (d) TOTAL CONTRIBUTIONS (other than loans) (Add 11a, 11b and 11c) | 9813.50 | 10113.50 |
| 12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES | — | — |
| 13. ALL LOANS RECEIVED | — | — |
| 14. LOAN REPAYMENTS RECEIVED | — | — |
| 15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.) | — | — |
| 16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES | — | — |
| 17. OTHER RECEIPTS (Dividends, Interest, etc.) | — | — |
| 18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17) | 9813.50 | 10113.50 |
| **II. DISBURSEMENTS** | | |
| 19. OPERATING EXPENDITURES | 106.31 | 106.31 |
| 20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES | — | — |
| 21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES | — | — |
| 22. INDEPENDENT EXPENDITURES (Use Schedule E) | — | — |
| 23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES 2 U.S.C. §441a(d) (Use Schedule F) | — | — |
| 24. LOAN REPAYMENTS MADE | — | — |
| 25. LOANS MADE | — | — |
| 26. REFUNDS OF CONTRIBUTIONS TO: | | |
| (a) Individuals/Persons Other Than Political Committees | — | — |
| (b) Political Party Committees | — | — |
| (c) Other Political Committees | — | — |
| (d) TOTAL CONTRIBUTION REFUNDS (Add 26a, 26b and 26c) | — | — |
| 27. OTHER DISBURSEMENTS | — | — |
| 28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27) | 106.31 | 106.31 |
| **III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES** | | |
| 29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d | 9813.50 | 10113.50 |
| 30. TOTAL CONTRIBUTION REFUNDS from Line 26d | — | — |
| 31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29) | 9813.50 | 10113.50 |
| 32. TOTAL OPERATING EXPENDITURES from Line 19 | 106.31 | 106.31 |
| 33. OFFSETS TO OPERATING EXPENDITURES from Line 15 | — | — |
| 34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32) | 106.31 | 106.31 |

SCHEDULE B

# ITEMIZED DISBURSEMENTS

Use additional schedules for continuation of the Detailed Summary Page

Any information contained on FEC Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than soliciting votes and address of any political committee to which contributions have been made.

Name of Committee (in full) [illegible]

| A. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement This Pe |
|---|---|---|---|
| United Virginia Bank<br>[illegible]<br>Alexandria, VA 22313 | Check-Bank Charge<br>Disbursement for: ☐ Primary ☐ General<br>☐ Other (specify): | 10-27-80<br>10-28-80<br>11-24-80 | 103.54<br>2.42<br>.35 |
| B. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General<br>☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Pe |
| C. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General<br>☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Pe |
| D. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General<br>☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Pe |
| E. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General<br>☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Pe |
| F. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General<br>☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Pe |

D-2-3-1-8-3-1-7-9-1 : 8 3 0 4 0 4 3 5 6 9 5

SCHEDULE D
(Revised 3/89)

# DEBTS AND OBLIGATIONS
Excluding Loans

| Name of Creditor (in Full) | Outstanding Balance Beginning of This Period | Amount Incurred | Payment This Period | Outstanding Balance at Close of This Period |
|---|---|---|---|---|
| A. Full Name, Mailing Address and Zip Code of Creditor<br>MEDIAMERICA<br>1900 N. Beauregard St. Suite #12<br>Alexandria, VA 22311 | | 8305.92 | 0 | 8305.92 |
| Nature of Debt (Purpose): Mailing Service List/ Rental-Account Payable | | | | |
| B. Full Name, Mailing Address and Zip Code of Debtor or Creditor<br>MEDIAMERICA<br>1900 N. Beauregard St. Suite #12<br>Alexandria, VA 22311 | | 1000.00 | — | 1000.00 |
| Nature of Debt (Purpose): Office Expense-Temporary Help | | | | |
| C. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |
| D. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |
| E. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |
| F. Full Name, Mailing Address and Zip Code of Debtor or Creditor | | | | |
| Nature of Debt (Purpose): | | | | |
| 1) SUBTOTALS This Period This Page (optional) | | | | |
| 2) TOTAL This Period (last page this line only) | | | | 9305.92 |
| 3) TOTAL OUTSTANDING LOANS from Schedule C (last page only) | | | | |
| 4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only) | | | | 9305.92 |

0 4 0 4 3 5 6 9 6

ALEXANDRIA, VA. 22311

##### 4-0]2453 J 234]]2 12/5/80 SIC CPS FSCFI
1 7039980334 UGM TDMA ALEXANDRIA VA 12/5 0900 EST

THE FOLLOWING MESSAGE IS TRANSMITTED FROM: NATIONAL REPUBLICAN CANDIDATE'S COMMITTEE..... JOHN D. ROMANIN.....NATIONAL FINANCE CHAIRMAN..... 0900 EST 12/5

ON BEHALF OF PRESIDENT-ELECT RONALD REAGAN AND MYSELF, THANK YOU! ..... , MAKE NO MISTAKE ABOUT IT..... RONALD REAGAN IS PRESIDENT BECAUSE OF YOUR BELIEF IN THE MAN AND THE PRINCIPLES HE REPRESENTS AND BECAUSE OF YOUR ENDURING SUPPORT.....I ALSO WANT TO EXTEND MY PERSONAL GRATITUDE TO YOU FOR HELPING ELECT A REPUBLICAN MAJORITY TO THE U. S. SENATE..... IT'S THE FIRST TIME IN OVER 26 YEARS REPUBLICANS HAVE CONTROLLED THE "UPPER CHAMBER"..... THIS VICTORY IS EVEN MORE GRATIFYING BECAUSE MANY GOOD CONSERVATIVES LIKE SENATORS THURMOND, HATCH AND GARN WILL BECOME CHAIRMEN OF VERY POWERFUL COMMITTEES..... ADDITIONALLY, OUT-STANDING CANDIDATES LIKE STEVE SYMMS FROM IDAHO AND PAULA HAWKINS FROM FLORIDA WILL GREATLY INCREASE OUR STRENGTH IN THE SENATE..... NONE OF THESE GAINS COULD HAVE BEEN POSSIBLE WITHOUT YOUR PERSONAL COMMITMENT... BUT NOW I MUST TURN MY ATTENTION TO HELPING THESE NEWLY ELECTED "REAGAN" SENATORS AND CONGRESSMEN..... COMBINED, THEY HAVE CAMPAIGN DEBTS TOTALIN $1.2 MILLION...THEY REALLY DESERVE HELP...MANY CAMPAIGNED 16-18 HOURS A DAY FOR MONTHS BEFORE THE ELECTION SO AS NOT TO LET US DOWN..... AND IN THE RACES THAT WERE TOO CLOSE TO CALL, I URGED EACH CANDIDATE TO SPEND A MINIMUM OF $50,000 ON LAST MINUTE TV AND RADIO ADVERTISEMENTS WITH MY PROMISE TO HELP THEM AFTER THE ELECTIONS..... I KNEW THAT IN A CLOSE RAC HEAVY TV AND RADIO SATURATION WOULD PUSH THEM OVER THE TOP..... MY STRATEGY WORKED BUT CAMPAIGNS HAD TO GO INTO DEBT..... WITH MASSIVE DEBT NOW HANGING OVER THEIR HEADS THEY CAN'T CONCENTRATE ON THEIR WORK..... MORE IMPORTANTLY, NEW CONSERVATIVES WITH LARGE DEBTS BECOME A PRIME TARGET OF WEALTHY LIBERALS AND POWERFUL LABOR UNIONS WHO HAVE SWORN "TO GET EVEN"..... PLEASE HELP ME KEEP MY PROMISE TO HELP THESE GOOD CONSERVATIVES PAY OFF THEIR DEBTS..... , WON'T YOU SEND THE NAT. REP. CANDIDATE'S COMM. $50 OR PERHAPS $100 OR MORE SO THAT I DON'T TO BREAK MY PROMISES TO THEM..... I APOLOGIZE FOR NOT CONSULTING WITH BEFORE ADVISING OUR CANDIDATES TO GO INTO DEBT IN ORDER TO WIN, BUT THERE WASN'T ANY TIME TO CONTACT YOU IN THE REMAINING DAYS OF THE ELECT I HOPE YOU'LL FORGIVE ME AND HELP THE COMMITTEE NOW BY SENDING AS GENER A CONTRIBUTION AS POSSIBLE..... GOD BLESS.....

0900 P EST JOHN. D. ROMANIN..... NATIONAL FINANCE CHAIRMAN

****** PLEASE REFOLD ENTIRE URGENTGRAM AND RETURN WITH CHECK IN ENCLOSED ENVELOPE - MAKE CHECK PAYABLE TO NATIONAL REPUBLICAN CANDIDATE'S COMMITTEE.******

TO REPLY BY URGENTGRAM, CALL URGENTGRAM AT (703) 998-0338

EXHIBIT 5

5824(M1-0780)

RECEIVED

# STATEMENT OF ORGANIZATION

(see reverse side for instructions)

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

NATIONAL REPUBLICAN CANDIDATES COMMITTEE

(b) Address (Number and Street)

1900 N. BEAUREGARD STREET, # 12, Bldg. 5

(c) City, State and ZIP Code

ALEXANDRIA, VIRGINIA 22311

2. Date

JUNE 30, 1980

3. FEC Identification Number

4. Is this an amended Statement? ☐ YES ☒ NO

5. TYPE OF COMMITTEE (check one):

☐ (a) This committee is a principal campaign committee. (Complete the candidate information below.)

☐ (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

| Name of Candidate | Candidate Party Affiliation | Office Sought | State/District |
|---|---|---|---|
| | | | |

☐ (c) This committee supports/opposes only one candidate _____ (name of candidate) and is NOT an authorized committee.

☐ (d) This committee is a _____ (National, State or subordinate) committee of the _____ (Democratic, Republican, etc.) Party

☐ (e) This committee is a separate segregated fund.

☒ (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

6.

| Name of Any Connected Organization or Affiliated Committee | Mailing Address and ZIP Code | Relationship |
|---|---|---|
| NONE | | |

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

☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization ☐ Membership Organization ☐ Trade Association ☐ Cooperative

7. Custodian of Records: Identify by name, address (phone number – optional) and position, the person in possession of committee books and records.

| Full Name | Mailing Address and ZIP Code | Title or Position |
|---|---|---|
| K.E. DENT | 1900 N. Beauregard St., # 12, Bldg. 5<br>Alexandria, Virginia 22311 | Treasurer |

8. Treasurer: List the name and address (phone number – optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

| Full Name | Mailing Address and ZIP Code | Title or Position |
|---|---|---|
| K.E. Dent | 1900 N. Beauregard St., #12, Bldg. 5<br>Alexandria, Virginia 22311 | Treasurer |

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

| Name of Bank, Depository, etc. | Mailing Address and ZIP Code |
|---|---|
| UNITED VIRGINIA BANK | 1460 North Beauregard Street<br>Alexandria, Virginia 22311 |

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

K.E. Dent
Type or Print Name of Treasurer

SIGNATURE OF TREASURER

June 30, 1980
Date

NOTE: Submission of false, fraudulent, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.

For further information contact: Federal Election Commission Toll Free 800-424-9530 Local 202-523-4068

FEC FORM 1 (3-79)

EXHIBIT 4

830040135698

FEC 158/4157

MEDIAMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

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

October 22, 1980

Attn: Mark Keinman

For the period October 1 thru 15th we have had no Federal Activity.

(NATIONAL REPUBLICANS CANDIDATES COMMITTEE Fec. #00130683)

Sincerely,

Shirley King

Shirley King,
Accountant/Office Mgr.

SK/bw

FEC 1731 1489

EXHIBIT 6

EDI AMERICA
Mark Center Office Plaza 5
1900 N. Beauregard Street, Suite 12
Alexandria, VA 22311
Phone 703 | 998 | 0334

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

8 3 0 4 0 4 3 5 7 0 1

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

FEC
81 JAN 16 P2

FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1363

Date Filmed 11/ Camera No. --- 3

Cameraman JRL

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 1363

Date Filmed 11/16/83 Camera No. --- 3

Cameraman JRL

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