

FEDERAL ELECTION COMMISSION

12 DAY REPORT

ROUTING SLIP

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):

- | | |
|------------------------------------------------------------------------------------|---------------------------------------------------------------------------|
| <input type="checkbox"/> (1) Classified Information | <input type="checkbox"/> (6) Personal privacy |
| <input type="checkbox"/> (2) Internal rules and practices | <input type="checkbox"/> (7) Investigatory files |
| <input type="checkbox"/> (3) Exempted by other statute | <input type="checkbox"/> (8) Banking Information |
| <input type="checkbox"/> (4) Trade secrets and commercial or financial information | <input type="checkbox"/> (9) Well Information (geographic or geophysical) |
| <input checked="" type="checkbox"/> (5) Internal Documents | |

Signed Glenn T. Dineen
date 4-14-82

FEC 9-21-77

0040321453



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

April 7, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Henry M. Feinstein, Esquire
Suite 950
Pharr Center
550 Pharr Road, N.E.
Atlanta, Georgia 30305

RE: MUR 1427

Dear Mr. Feinstein:

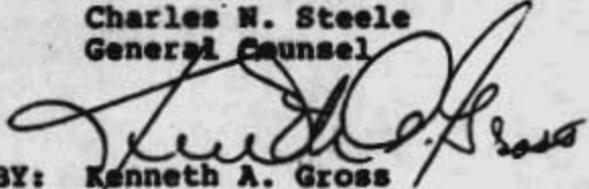
The Federal Election Commission has reviewed the allegations of your client's complaint dated February 3, 1982, and determined that on the basis of the information provided in the complaint and information provided by the Respondent, there is no reason to believe that a violation of the Federal Election Campaign Act of 1971, as amended ("the Act") has been committed.

Accordingly, the Commission has decided to close the file in this matter. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

Charles W. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel

62040321454



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Henry M. Feinstein, Esquire
Suite 950
Pharr Center
550 Pharr Road, N.E.
Atlanta, Georgia 30305

RE: MUR 1427

Dear Mr. Feinstein:

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Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

62040321455

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 7, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J. Reese Franklin, Esquire
110 North Dogwood Drive
Nashville, Georgia 31639

RE: MUR 1427

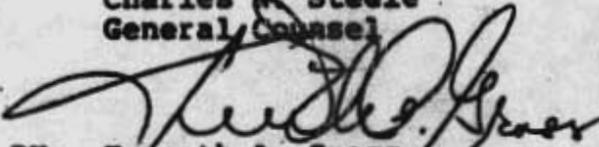
6 Dear Mr. Franklin:

5 On February 7, 1982, the Commission notified your clients of
4 a complaint alleging that they had violated certain sections of
3 the Federal Election Campaign Act of 1971, as amended.

2 The Commission, on April 6, 1982, determined that on the
1 basis of the information in the complaint and information
provided by the respondents, there is no reason to believe that a
violation of any statute within its jurisdiction has been
committed. Accordingly, the Commission closed its file in this
matter. This matter will become a part of the public record
within thirty days.

Sincerely,

Charles M. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel

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1427 - Donaldson y/a

RECIPIENT Complete lines 1, 2, and 3. Add your address to the "RETURN TO" space on back.

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. Reese Franklin, Esq.
110 N. Dogwood Drive
Nashville, GA 31639

3. ARTICLE SUBSCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE *[Signature]* Addressee Postmaster agent

DATE OF DELIVERY
4-12-82

4. ADDRESS Complete only if requested

5. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS
mf



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J. Reese Franklin, Esquire
110 North Dogwood Drive
Nashville, Georgia 31639

RE: MUR 1427

8 Dear Mr. Franklin:

On February 7, 1982, the Commission notified your clients of a complaint alleging that they had violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on _____, 1982, determined that on the basis of the information in the complaint and information provided by the respondents, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within thirty days.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

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4.6.82

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	MUR 1427
Hanson Carter, Hanson Carter)	
for Congress Committee, Perry A.)	
Harris)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 6, 1982, the Commission decided by a vote of 6-0 to take the following actions in MUR 1427:

1. Find NO Reason to Believe that Hanson Carter, the Hanson Carter for Congress Committee, and Perry A. Harris violated 2 U.S.C. § 441a of the Federal Election Campaign Act of 1971, as amended.
2. Find NO Reason to Believe that Klein-Sieb Advertising, Inc. violated 2 U.S.C. § 441b of the Federal Election Campaign Act of 1971, as amended.
3. Approve the letters as attached to the First General Counsel's Report dated April 2, 1982.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter.

Attest:

4/6/82

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:
Circulated on 48 hour tally basis:

4-2-82, 10:48
4-2-82, 2:00

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SENSITIVE

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

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

82 APR 2 AIO: 48

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION 4-2-82

MUR NO. 1427
DATE COMPLAINT RECEIVED BY
OGC 2/8/82
DATE OF NOTIFICATION TO
RESPONDENT 2/10/82
STAFF MEMBER Susan Donaldson

COMPLAINANT'S NAME: Klein-Sieb Advertising, Inc.
RESPONDENT'S NAME: Hanson Carter, Hanson Carter for
Congress Committee, Perry A. Harris
RELEVANT STATUTES: 2 U.S.C. § 441a and 2 U.S.C. § 441b
INTERNAL REPORTS CHECKED: Hanson Carter for Congress Committee
FEDERAL AGENCIES CHECKED: Not Applicable

SUMMARY OF ALLEGATIONS

Klein-Sieb Advertising, Inc. ("Klein-Sieb"), an advertising agency and public relations firm, has alleged that the Hanson Carter for Congress Campaign Committee ("the Committee") accepted unauthorized expenditures from Klein-Sieb in violation of 2 U.S.C. §§ 441a and 441b.

FACTUAL AND LEGAL ANALYSIS

Hanson R. Carter was a candidate for Congress in the Second District of Georgia in 1980. During the campaign, his principal campaign committee, the Hanson Carter for Congress Campaign Committee (Hanson R. Carter - Chairman, Perry A. Harris, Jr. - Treasurer) contracted with Klein-Sieb Advertising, Inc. for a variety of campaign promotional services and material. According

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to the reports filed by the Committee and statements made by Klein-Sieb, the Committee owed Klein-Sieb \$17,869.54.

Klein-Sieb filed suit against Harris and Carter in Georgia Superior Court in August, 1981, seeking repayment. In September, 1981, Carter and Harris countersued, stating that Klein-Sieb contracted for unauthorized expenditures of \$17,500 which the Committee paid, and now wants reimbursed.

In the complaint filed by Klein-Sieb with the Commission, it is alleged that if Carter and Harris accepted unauthorized expenditures (as Harris and Carter claim in their countersuit), such acceptance would be considered acceptance of excessive and corporate contributions in violation of 2 U.S.C. §§ 441a and 441b.

The respondents answered the allegations made by Klein-Sieb in a letter to the Commission dated February 26, 1982. They stated that Klein-Sieb never furnished them with original invoices in connection with the \$17,869.54 which is in dispute. The Committee also stated that they listed the disputed amount on their FEC reports "because they did not want to violate the FEC Rules by leaving off invoices received although they were incorrect." Furthermore, "Respondents deny accepting any contributions (from Klein-Sieb). Respondents were simply overcharged for the services rendered."

The term "contribution" includes "any... advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office." Further, 11 C.F.R. § 100.7(a)(4) provides that "the extension of credit by

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any person for a length of time beyond normal business or trade practice is a contribution, unless the creditor has made a commercially reasonable attempt to collect the debt." Based on the fact that Klein-Sieb has attempted to collect the alleged debt through Georgia Superior Court, it does not appear that the expenditures made by Klein-Sieb would be considered corporate contributions.

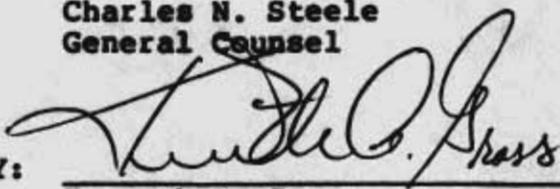
It appears that this matter is a question of the obligations and rights arising under the contract between Klein-Sieb and the Committee which is not within the jurisdiction of the Commission.

RECOMMENDATIONS

1. Find no reason to believe that Hanson Carter, the Hanson Carter for Congress Committee, and Perry A. Harris violated 2 U.S.C. § 441a of the Federal Election Campaign Act of 1971, as amended.
2. Find no reason to believe that Klein-Sieb Advertising, Inc. violated 2 U.S.C. § 441b of the Federal Election Campaign Act of 1971, as amended.
3. Approve attached letters.

Charles N. Steele
General Counsel

April 1, 1982
Date

BY: 
Kenneth A. Gross
Associate General Counsel

Attachments

- Proposed letters - 2
- Complaint from Feinstein dated February 3, 1982
- Answers from Franklin dated February 26, 1982

82040321463



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J. Reese Franklin, Esquire
110 North Dogwood Drive
Nashville, Georgia 31639

RE: MUR 1427

Dear Mr. Franklin:

On February 7, 1982, the Commission notified your clients of a complaint alleging that they had violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on _____, 1982, determined that on the basis of the information in the complaint and information provided by the respondents, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within thirty days.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

02040321464



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Henry M. Feinstein, Esquire
Suite 950
Pharr Center
550 Pharr Road, N.E.
Atlanta, Georgia 30305

RE: MUR 1427

Dear Mr. Feinstein:

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Accordingly, the Commission has decided to close the file in this matter. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

02040321465

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HENRY M. FEINSTEIN

ATTORNEY AT LAW
SUITE 850 PHARR CENTER
850 PHARR ROAD, N.E.
ATLANTA, GEORGIA 30308

February 3, 1982

TELEPHONE
AREA CODE 404
531-2300

6cc# 713

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

CERTIFIED MAIL NO. 046605
RETURN RECEIPT REQUESTED

Re: Complaint against Hanson R. Carter,
Perry A. Harris, Jr., and The Hanson
Carter for Congress Campaign Committee

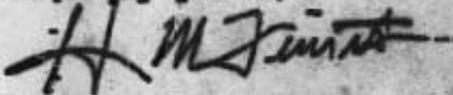
Dear Mr. Steele:

Pursuant to the rules of the Federal Election Commission, I have enclosed herewith an original and three executed copies of a formal Complaint against the above-named parties. Please acknowledge receipt of this Complaint by stamping one copy of the Complaint with the date and time of receipt and returning it to the undersigned.

If you require any additional information in order to commence action in connection with this matter, please contact the undersigned directly.

With best regards.

Sincerely yours,



HENRY M. FEINSTEIN

HMF/rs

cc: Mr. Edward H. Sieb

RECEIVED
FEB 04 1982
11:00

FEDERAL ELECTION COMMISSION

IN RE: The matter of Hanson R. Carter,
Perry A. Harris, Jr., and the
Hanson Carter for Congress
Campaign Committee (FEC Identifi-
cation No. 089176)

COMPLAINT

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

COMES NOW KLEIN-SIEB ADVERTISING, INC., a Georgia corporation, and files this its Complaint against Hanson R. Carter, Perry A. Harris, Jr., and The Hanson Carter for Congress Campaign Committee and shows as follows:

1.

Klein-Sieb Advertising, Inc. (hereinafter referred to as "Klein-Sieb") is a Georgia corporation engaged in the business of an advertising agency and a public relations firm.

2.

Klein-Sieb's office is located at Suite 302, 180 Allen Road, N.E., Atlanta, Georgia 30328. Klein-Sieb's telephone number is (404) 256-9605.

3.

Hanson R. Carter (hereinafter referred to as "Carter") is an individual resident of the County of Berrien, State of Georgia, who unsuccessfully ran in a primary election for Congress in the 2nd District of Georgia, in 1980. On information and belief Carter's address is Post Office Box 645, Nashville, Georgia 31639.

4.

The Hanson Carter for Congress Campaign Committee (hereinafter referred to as the "Campaign Committee"), whose FEC identification number is 089176, is an unincorporated association whose chairman was Carter and whose treasurer was Perry A. Harris, Jr., (hereinafter referred to as "Harris") also a resident of the County of Berrien, State of Georgia. On information and belief Harris' address is c/o Citizens Bank, Nashville, Georgia.

5.

Carter and the Campaign Committee contracted for the services of Klein-Sieb for assistance in raising funds, preparing election campaign material, and placing advertisements in the media.

6.

In the ordinary course of Klein-Sieb's business and on terms similar to extensions of credit to non-political debtors, Klein-Sieb provided the requested services, campaign material, and media placement, and subsequently rendered invoices for all such items.

7.

Klein-Sieb has received in payment \$29,898.10 for services, campaign material, and media placement.

8.

Klein-Sieb has sent the Campaign Committee twelve invoices, attached hereto as Exhibits "A", totaling \$17,869.54, which have not been paid. The Statement of Account summarizing the twelve invoices, dated July 22, 1980, is attached hereto as Exhibit "B".

9.

In the Report of Receipts and Disbursements filed by the Campaign Committee for the period from July 15, 1980,

through September 30, 1980, on Schedule D, the foregoing debt is set forth as \$17,869.54 and is undisputed.

10.

In the Report of Receipts and Disbursements for the period from October 1, 1980, through December 31, 1980, the foregoing debt is again set forth on Schedule D and again is undisputed.

11.

All services, campaign material, and media placement provided by Klein-Sieb were authorized by Carter and the Campaign Committee, and were accepted by Carter, Harris, and the Campaign Committee (with the possible exception of one month's use of billboards, which were mistakenly permitted to remain in use, but for which no charges were made).

12.

Carter, Harris, and the Campaign Committee has failed and refused to pay the foregoing amounts.

13.

Demand was made of Carter and Harris by letter dated April 7, 1981, a copy of which is attached as Exhibit "C". Carter and Harris have failed and refused to pay the indebtedness.

14.

On August 7, 1981, Klein-Sieb filed suit in the Superior Court of Berrien County, State of Georgia, against Carter and Harris. A copy of the Complaint is attached hereto as Exhibit "D".

15.

On September 10, 1981, Carter and Harris filed a pleading entitled "Answer, Defenses and Counterclaim", a copy of which is attached hereto as Exhibit "E", wherein for the

first time, Carter and Harris have stated that expenditures contracted for by Klein-Sieb on behalf of Carter were unauthorized.

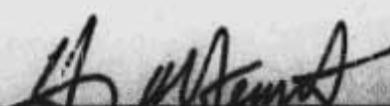
16.

All services rendered by Klein-Sieb, all campaign material obtained or produced by Klein-Sieb, and all media placements (except for one item set forth in Paragraph 11 above) were authorized by Carter and the Campaign Committee. All such items were accepted by Carter, Harris and the Campaign Committee.

17.

On the assumption that the allegations of the Answer, Defenses and Counterclaim of Carter and Harris are correct, i.e., that such expenditures were not authorized (which assertion is hereby denied), all of such expenditures were accepted by Carter, Harris and the Campaign Committee and, accordingly, from the point of view of Carter, Harris, and the Campaign Committee, such expenditures could only be deemed to be campaign contributions which are illegal under the provisions of 2 USCA §441a. and 2 USCA §441b.

WHEREFORE, Klein-Sieb hereby respectfully requests that the Federal Election Commission investigate the acceptance of expenditures by Carter, Harris, and the Campaign Committee as contributions in violation of the Federal Election Campaign Act of 1971, as amended, and the regulations promulgated thereunder.


HENRY M. FEINSTEIN, Attorney for
KLEIN-SIEB ADVERTISING, INC.

Suite 950 Pharr Center
550 Pharr Road, N.E.
Atlanta, Georgia 30305
(404) 231-2300

Klein-Sieb Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



Hanson Carter for Congress Campaign Committee
 Box 711
 Nashville, GA 31639

DATE: May 23, 1980

INVOICE NO. 824-80

JOB
 NUMBER

TERMS: NET 10 DAYS

012	<p><u>Campaign Brochure</u></p> <p>Layout and Design, Mechanical Pasteup, Typography, Negatives, Printing (10,000)</p>	\$1,727.53	
017	<p><u>Campaign Mailing</u></p> <p>Mechanical Pasteup, Typography and Stats, Printing and folding 1,650 letters, Printing 10,000 envelopes, Postage, 1650 pieces @ \$.28 each.</p> <p><u>500 9" Balloons - Green and White</u></p> <p>"Hanson Carter for Congress"</p> <p><u>Photos</u></p> <p>17 4 x 5 color reprints, 8 proof sheets, 17 8 x 10 prints sent UPS, 44 3 1/2 x 5 color prints, 7 8 x 10 black and white prints, 2 1/2 hours photography</p> <p><u>Southern National</u></p> <p>30 Sheet Posters (Outdoor)</p> <p><u>Medical Association of Georgia</u></p> <p><u>Labels</u></p> <p><u>Dependable Courier Services</u></p> <p>Delivery Charges</p>	<p>\$ 953.64</p> <p>119.88</p> <p>\$ 267.75</p> <p>54.08</p> <p>77.59</p> <p>74.55</p>	
	Total Invoice		\$3,275.02

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Klein-Sieb Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE June 6, 1980
INVOICE NO. 837-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS: NET 10 DAYS

275 Mini Billboards Mechanical Paste Up & Typography	\$ 430.00 48.67	
Total Invoice		\$ 478.67

EXHIBIT "A"

8 2 0 4 0 3 2 1 7 3

Klein-Sieb Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE June 6, 1980

INVOICE NO. 838-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Ga. 31639

JOB
NUMBER

TERMS NET 10 DAYS

1958	5,000 2/color Letterheads 5,000 Matching Envelopes Layout, Mechanical Paste Up, Typography - for letterheads & envelopes	\$ 525.00 266.00 106.17	
	Total Invoice		\$ 897.17

EXHIBIT "A"

8 2 0 4 0 3 2 1 4 4

Klein-Sieb Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE June 6, 1980

INVOICE NO. 839-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia - 31639

JOB
NUMBER

TERMS: NET 10 DAYS

1960	5,000 Bumper Stickers (includes Layout, Design, Typography)	\$ 987.01	
Total Invoice			\$ 987.01

EXHIBIT "A"

8 2 0 4 0 3 2 1 4 5

Klein-Sieb Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE - June 6, 1980
INVOICE NO. 840-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS: NET 10 DAYS

1949	10,000 Hand-Out Cards (includes Paste-Up & Typography)	\$ 246.26	
1824	5,000 Contribution Cards (includes Paste-Up & Typography)	\$ 185.79	
	Total Invoice		\$ 432.05

EXHIBIT "A"

8 2 0 4 0 3 2 1 6

Klein-Sieb Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE June 6, 1980

INVOICE NO. 841-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS: NET 10 DAYS

2131	Three Signs for Valdosta Office 40"x60" 40"x120" 40"x140"	\$ 296.65	
1976	One 3'x12' Banner for Nashville Office	\$ 180.00	
703	Two 22"x8' Banners for Fire Truck	\$ 96.00	
	Total Invoice		\$ 572.65

EXHIBIT "A"

8 2 0 4 0 3 2 1 7 7

Klein-Sieb Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE June 6, 1980

INVOICE NO. 842-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
NUMBER

TERMS: NET 10 DAYS

<u>Miscellaneous</u>			
2003	Four - Congressional Badges	\$	18.67
1960	17 - Skimmers for Grand Opening		30.05
1963	36 - T-Shirts with special design		294.01
	Press Release - Folding, Mailing, Postage		62.60
1962	Three Enlargements of Congressional District Maps - Dry Mounting		180.00
	UPS Delivery Cost		15.20
	Misc. Delivery Service, Shipping Charges		61.00
	Five - 8x10 B&W Prints		
	25 - 4x5 B&W Prints		
	One - Internegative		154.64
	Total Invoice	\$	816.17

EXHIBIT "A"

8 2 0 4 0 3 2 1 7 8

Klein-Sieb Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE July 22, 1980

INVOICE NO. 877-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS: NET 10 DAYS

<u>Media:</u>		
<u>WCTV</u> 8 spots/week - w/o 7/14-7/18/80 and w/o 7/21-7/25/80		\$ 440.00
<u>WALB TV</u> 7 :30 spots w/o 7/14-7/18/80 and w/o 7/21-7/25/80		\$ 1040.00
Total Invoice		\$1,480.00

EXHIBIT "A"

8 2 0 4 0 3 2 1 7 9

Klein-Sieb Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE: July 22, 1980

INVOICE NO. 878-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS: NET 40 DAYS

2129 2155	<u>Southern National</u> Paper for Outdoor Boards	\$ 2140.17	
	<u>Campaign Letters</u> Printing - 8,000 letters	\$ 440.69	
	Total Invoice		\$2,580.86

EXHIBIT 68 A 59

Klein-Sieb Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE July 24, 1980

INVOICE NO. 885-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS: NET 30 DAYS

Media:

WALB TV - (Weeks of July 28, August 4)

- 1 spot, 6:30 a.m.-7:00 a.m. July 28,30,
August 1,4
- 1 spot, 7:00 a.m. - 9:00 a.m., July 29,31
August 4
- 1 spot, 12:00 noon - 1:00 p.m., July 28,30,
August 1,4
- 1 spot, 6:00 p.m. - 6:30 p.m., July 29,31,
August 4
- 1 spot, 11:30 p.m. to C.C., July 28,29,30,31,
August 1,4
- 1 spot, 9:00 p.m. - 11:00 p.m., August 4
- 1 spot, 11:00 p.m. - 11:30 p.m., August 3
- 1 spot, 7:30 p.m., July 28,30,31
- 1 spot, 9:00 p.m., August 1
- 1 spot, 7:00 p.m. - 8:00 p.m., August 2
- 1 spot, 8:00 p.m., August 3

Total 28 spots

\$ 3212.70

WCTV - (Weeks of July 28, August 4)

- 1 spot, 6:00 am - 7:00 am, July 28,30,
August 1
- 1 spot, 7:00am - 8:00 am, July 29,31
- 1 spot, afternoon rotation, July 28, 30,
August 1
- 1 spot, 7:00pm - 8:00pm, July 29,31
- 1 spot, 11:00pm to C.C., July 28,29,30,31,
August 1
- 1 spot, 8:00pm - 11:00pm, August 3

Total 16 spots

\$ 974.12

Production - WALB-TV

\$ 470.00

Total Invoice

\$4,656.82

Klein-Sieb Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE: July 28, 1980

INVOICE NO. 889-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS: NET 10 DAYS

<p>WCTV - (Week of July 29 - August 1) 1 spot, 7-8pm July 19 2 spots, 11:30pm - CC, July 19 1 spot, 6-7am, July 30 2 spots, 7-8am, July 30 3 spots, 7-8pm, July 30 4 spots, 9-11pm, July 30 1 spot, 11:30pm - CC, July 30 4 spots, 6-7am, July 31 3 spots, 12:30-4:30pm, July 31 2 spots, 9-10pm, July 31 3 spots, 11:30 - CC, July 31 3 spots, 6-7am - August 1 4 spots, 7-8am, August 1 1 spot, 12:30-4:30pm, August 1</p>	<p>\$ 385.88</p>
<p>Total Invoice</p>	<p>\$ 385.88</p>

Klein-Sleb Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE July 31, 1980

INVOICE NO. 899-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS: NET 10 DAYS

Media:

Radio Buy 7/31-8/4/80 - 20 spots on
each station

WALG - Albany	\$ 141.18
WMES - Ashburn	45.88
WAZA - Bainbridge	35.29
WMGR - Bainbridge	48.47
WBBK - Blakley	110.00
WGRA - Cairo	58.82
WCLB - Camilla	29.41
WCUG - Cuthbert	70.59
WDWD - Dawson	70.59
WMGA - Moultrie	31.76
WMJM - Cordele	34.70
WMTM - Moultrie	41.17
WRSG - Sylvester	29.40
WLOR - Thomasville	60.00
WPAX - Thomasville	45.88
WCUP - Tifton	49.41
WTIP - Tifton	47.06
HWGS - Tifton	49.41
WGAP - Valdosta	47.06
WGOV - Valdosta	47.06
NJEM - Valdosta	88.23
WFLD - Valdosta	64.70
WQDE - Albany	61.17

Total Invoice

\$1307.24

EXHIBIT "A"

Klein-Sieb Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE July 22, 1980

INVOICE NO

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

08
 NUMBER

TERMS NET 40 DAYS

STATEMENT OF ACCOUNT

Invoice #826-80	\$ 3275.02
Invoice #837-80	478.67
Invoice #838-80	897.17
Invoice #839-80	987.01
Invoice #840-80	432.05
Invoice #841-80	572.65
Invoice #842-80	816.17
Invoice #877-80	1480.00
Invoice #878-80	2580.86
Invoice #885-80	4656.82
Invoice #889-80	385.88
Invoice #899-80	1307.24

Total Balance

EXHIBIT "B"

HENRY M. FEINSTEIN

ATTORNEY AT LAW

SUITE 880 PHARR CENTER

880 PHARR ROAD, N.E.

ATLANTA, GEORGIA 30308

April 7, 1981

TELEPHONE
AREA CODE 404
521-2200

Honorable Hanson R. Carter
Post Office Box 645
Nashville, Georgia 31639

CERTIFIED MAIL NO. 046562
RETURN RECEIPT REQUESTED

Mr. Perry A. Harris, Jr.
c/o Citizens Bank
Nashville, Georgia 31639

CERTIFIED MAIL NO. 046563
RETURN RECEIPT REQUESTED

Gentlemen:

The undersigned represents Klein-Sieb Advertising, Inc., a Georgia corporation, to whom you are indebted in the amount of \$17,869.54.

Please be advised that my client has attempted with no success to establish a dialogue with Mr. Carter in order to establish an orderly schedule for the repayment of all outstanding amounts. Under the regulations of the Federal Election Commission Klein-Sieb Advertising, Inc. is required to pursue its "remedies in a manner similar in intensity to that employed by the corporation in pursuit of a non-political debtor, including lawsuits if filed in similar circumstances." (11 CFR 114.10).

You are hereby advised that under Georgia law you, as Chairman and Treasurer, respectively, of the Hanson Carter For Congress Campaign Committee, who authorized or subsequently ratified the transaction or obligation incurred by or on behalf of the committee, are individually jointly and severally liable as principals thereon. Accordingly, demand is herewith made that you immediately pay Klein-Sieb Advertising, Inc. the sum of \$17,869.54.

This letter shall also serve as notice that Klein-Sieb Advertising, Inc. shall exercise all of its rights and remedies under Georgia law against all parties liable for the aforesaid obligation if Klein-Sieb Advertising, Inc. has not received payment in full or if an acceptable repayment program is not initiated within ten (10) days from the receipt of this letter.

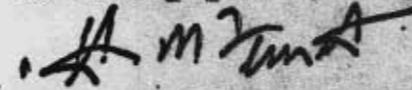
Honorable Hanson R. Carter
Mr. Perry A. Harris, Jr.
April 7, 1981
Page Two

Payment should be made directly to this office. All inquiries concerning this matter should be directed to the undersigned.

A copy of this letter is being sent to each of you by regular mail. Refusal of delivery or failure to accept delivery is deemed, under the law, to be the equivalent of notice.

Govern yourself accordingly.

Sincerely yours,



HENRY M. FEINSTEIN

HMF/vj

cc: Honorable Hanson R. Carter (by regular mail)
Mr. Perry A. Harris, Jr. (by regular mail)
Mr. Edward H. Sieb

EXHIBIT "C"

No. 046562

RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED—
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

SENT TO		Hon. Hanson R. Carter		
STREET AND NO.		P. O. Box 645		
P.O., STATE AND ZIP CODE		Nashville, GA 31639		
POSTAGE		\$		
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE		¢	
	SPECIAL DELIVERY		¢	
	RESTRICTED DELIVERY		¢	
	OPTIONAL SERVICES	RETURN RECEIPT SERVICE		¢
		SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY		¢
		SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY		¢
SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY			¢	
TOTAL POSTAGE AND FEES		\$		
POSTMARK OR DATE				

PS Form 3800, Apr. 1976

No. 046563

RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED—
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

SENT TO		Perry A. Harris, Jr.		
STREET AND NO.		c/o Citizens Bank		
P.O., STATE AND ZIP CODE		Nashville, GA 31639		
POSTAGE		\$		
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE		¢	
	SPECIAL DELIVERY		¢	
	RESTRICTED DELIVERY		¢	
	OPTIONAL SERVICES	RETURN RECEIPT SERVICE		¢
		SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY		¢
		SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY		¢
SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY			¢	
TOTAL POSTAGE AND FEES		\$		
POSTMARK OR DATE				

PS Form 3800, Apr. 1976

PS Form 3811, Aug. 1978

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:
 Perry A. Harris, Jr.
 c/o Citizens Bank
 Nashville, GA 31639

3. ARTICLE DESCRIPTION:
 REGISTERED NO. 046563 INSURED NO.

4. I have received the article described above.
 SIGNATURE: *Perry A. Harris, Jr.* ADDRESS: Registered agent
 DATE OF DELIVERY: 4-9-81 POSTMARK: NASHVILLE, GA

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: _____ CLERK'S INITIALS: _____

PS Form 3811, Aug. 1978

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:
 Hon. Hanson R. Carter
 P. O. box 645
 Nashville, GA 31639

3. ARTICLE DESCRIPTION:
 REGISTERED NO. 046562 INSURED NO.

4. I have received the article described above.
 SIGNATURE: *Hanson R. Carter* ADDRESS: Authorized agent
 DATE OF DELIVERY: 4-9-81 POSTMARK: NASHVILLE, GA

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: _____ CLERK'S INITIALS: _____

EXHIBIT "C"

IN THE SUPERIOR COURT FOR THE COUNTY
OF BERRIEN, STATE OF GEORGIA

KLEIN-SIEB ADVERTISING, INC.,	§	
Plaintiff,	§	
	§	
VS.	§	CIVIL ACTION NO. _____
	§	
HANSON R. CARTER and PERRY A.	§	
HARRIS, JR.,	§	
Defendants.	§	

COMPLAINT

1.

The defendants are residents of Berrien County, Georgia, and subject to the jurisdiction of this court.

2.

The defendants are jointly and severally liable to the plaintiff for \$17,869.54 for advertising services provided at their direction on behalf of the Hanson R. Carter Campaign for Congress, as shown upon the statements hereto attached as "Exhibit A".

3.

The defendants have failed and refused to pay for the services herein sued upon.

WHEREFORE, the plaintiff demands judgment against the defendant for \$17,869.54 plus interest and all costs of this action.

BOB REINHARDT
Reinhardt, Whitley & Rogers, P. C.
P. O. Drawer 1287
Tifton, Georgia 31793
attorneys for plaintiff

REINHARDT, WHITLEY
& ROGERS, P.C.
ATTORNEYS AT LAW
P. O. DRAWER 1287
TIFTON, GEORGIA 31793

Klein-Sleb Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE July 22, 1980

INVOICE NO

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

CS
NUMBER

TERMS NET 10 DAYS

STATEMENT OF ACCOUNT

Invoice #826-80	\$ 3275.02
Invoice #837-80	478.67
Invoice #838-80	897.17
Invoice #839-80	987.01
Invoice #840-80	432.05
Invoice #841-80	572.65
Invoice #842-80	816.17
Invoice #877-80	1480.00
Invoice #878-80	2580.86
Invoice #885-80	4656.82
Invoice #889-80	385.88
Invoice #899-80	1307.24

Total Balance

\$17

EXHIBIT A

EXHIBIT "D"

Klein-Siebert Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



Hanson Carter for Congress Campaign Committee
Box 711
Nashville, GA 31639

DATE May 23, 1980
INVOICE NO 826-80

JOB
NUMBER

TERMS NET 10 DAYS

2012	<u>Campaign Brochure</u> Layout and Design, Mechanical Pasteup, Typography, Negatives, Printing (10,000)	\$1,727.53	
2017	<u>Campaign Mailing</u> Mechanical Pasteup, Typography and Stats, Printing and folding 1,650 letters, Printing 10,000 envelopes, Postage, 1650 pieces @ \$.28 each.	\$ 953.64	
	<u>500.9" Balloons - Green and White</u> "Hanson Carter for Congress"	119.88	
	<u>Photos</u> 17 4 x 5 color reprints, 8 proof sheets, 17 8 x 10 prints sent UPS, 44 3 1/2 x 5 color prints, 7 8 x 10 black and white prints, 2 1/2 hours photography	\$ 267.75	
	<u>Southern National</u> 30 Sheet Posters (Outdoor)	54.08	
	<u>Medical Association of Georgia</u> Labels	77.39	
	<u>Dependable Courier Services</u> Delivery Charges	74.55	
	Total Invoice		\$3,275.02

8 2 0 4 0 3 2 1 9 1

Klein-Sieb Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE: June 6, 1980

INVOICE NO. 837-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS NET 10 DAYS

275 Mini Billboards
Mechanical Paste Up & Typography

\$ 430.00
48.67

Total Invoice

\$ 478.67

EXHIBIT "D"

Kleir Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE June 6, 1980
INVOICE NO. 838-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Ga. 31639

JOB
NUMBER

TERMS NET 10 DAYS

1958	5,000 2/color Letterheads 5,000 Matching Envelopes Layout, Mechanical Paste Up, Typography - for letterheads & envelopes	\$ 525.00 266.00 106.17	
Total Invoice			\$ 897.17

8 2 0 4 0 3 2 1 9 3

Klein-Sir Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE June 6, 1980

INVOICE NO. 839-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS NET 10 DAYS

1960	5,000 Bumper Stickers (includes Layout, Design, Typography)	\$ 987.01	\$ 987.01
	Total Invoice		

EXHIBIT "D"

8 2 0 4 0 3 2 1 9 4

Klein Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE June 6, 1980

INVOICE NO. 840-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS NET 10 DAYS

1949	10,000 Hand-Out Cards (includes Paste-Up & Typography)	\$ 246.26
1824	5,000 Contribution Cards (includes Paste-Up & Typography)	\$ 185.79
	Total Invoice	\$ 432.05

EXHIBIT "D"

8 2 0 4 0 3 2 1 9 5

Klein-Siel Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE June 6, 1980

INVOICE NO. 641-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS NET 10 DAYS

2131	Three Signs for Valdosta Office 40"x60" 40"x120" 40"x140"	\$ 296.65
1976	One 3'x12' Banner for Nashville Office	\$ 180.00
203	Two 22"x8' Banners for Fire Truck	\$ 96.00
Total Invoice		\$ 572.65

EXHIBIT "D"

8 2 0 4 0 3 2 1 9 6

Klein-Siebert Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE June 6, 1980

INVOICE NO. 842-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS NET 10 DAYS

JOB NUMBER	Description	Amount	Total
	<u>Miscellaneous</u>		
2003	Four - Congressional Badges	\$ 18.67	
1960	17 - Skimmers for Grand Opening	30.05	
1963	36 - T-Shirts with special design	294.01	
	Press Release - Folding, Mailing, Postage	62.60	
1962	Three Enlargements of Congressional District Maps - Dry Mounting	180.00	
	UPS Delivery Cost	15.20	
	Misc. Delivery Service, Shipping Charges	61.00	
	Five - 8x10 B&W Prints		
	25 - 4x5 B&W Prints		
	One - Internegative	154.64	
	Total Invoice		\$ 816.17

EXHIBIT "D"

8 2 0 4 0 3 2 1 9 7

Klein-Sieh Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE July 22, 1980

INVOICE NO. 877-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS NET 10 DAYS

Media:

WCTV

8 spots/week - w/o 7/14-7/18/80 and
w/o 7/21-7/25/80,

\$ 440.00

WALB TV

7 :30 spots w/o 7/14-7/18/80 and
w/o 7/21-7/25/80.

\$ 1040.00

Total Invoice

\$1,480.00

EXHIBIT "D"

8 2 0 4 0 3 2 1 9 8

Klein Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE July 22, 1980

INVOICE NO. 878-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB -
NUMBER

TERMS NET 10 DAYS

2129 2155	<u>Southern National</u> Paper for Outdoor Boards	\$ 2140.17	
	<u>Campaign Letters</u> Printing - 8,000 letters	\$ 440.69	
	Total Invoice		\$2,580.86

EXHIBIT "D"

WALB-TV, Inc.
Suite 315
404) 892-8946



DATE July 24, 1980

INVOICE NO 885-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS NET 10 DAYS

Media:WALB TV - (Weeks of July 28, August 4)

- 1 spot, 6:30 a.m.-7:00 a.m. July 28,30,
August 1,4
- 1 spot, 7:00 a.m. - 9:00 a.m., July 29,31
August 4
- 1 spot, 12:00 noon - 1:00 p.m., July 28,30,
August 1,4
- 1 spot, 6:00 p.m. - 6:30 p.m., July 29,31,
August 4
- 1 spot, 11:30 p.m. to C.C., July 28,29,30,31,
August 1,4
- 1 spot, 9:00 p.m. - 11:00 p.m., August 4
- 1 spot, 11:00 p.m. - 11:30 p.m., August 3
- 1 spot, 7:30 p.m., July 28,30,31.
- 1 spot, 9:00 p.m., August 1
- 1 spot, 7:00 p.m. - 8:00 p.m., August 2
- 1 spot, 8:00 p.m., August 3

Total 28 spots

\$ 3212.70

WCTV - (Weeks of July 28, August 4)

- 1 spot, 6:00 am - 7:00 am, July 28,30,
August 1
- 1 spot, 7:00am - 8:00 am, July 29,31
- 1 spot, afternoon rotation, July 28, 30,
August 1
- 1 spot, 7:00pm - 8:00pm, July 29,31
- 1 spot, 11:00pm to C.C., July 28,29,30,31,
August 1
- 1 spot, 8:00pm - 11:00pm, August 3

Total 16 spots

\$ 974.12

Production - WALB-TV

\$ 470.00

Total Invoice

\$4,656.82

EXHIBIT "D"

8 2 0 4 0 3 2 1 0 0

Suite 315
104)892-8946



DATE July 28, 1980

INVOICE NO. 889-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS: NET 10 DAYS

WCTV - (Week of July 29 - August 1)

- 1 spot, 7-8pm July 19
- 2 spots, 11:30pm - CC, July 19
- 1 spot, 6-7am, July 30
- 2 spots, 7-8am, July 30
- 3 spots, 7-8pm, July 30
- 4 spots, 9-11pm, July 30
- 1 spot, 11:30pm - CC, July 30
- 4 spots, 6-7am, July 31
- 3 spots, 12:30-4:30pm, July 31
- 2 spots, 9-10pm, July 31
- 3 spots, 11:30 - CC, July 31
- 3 spots, 6-7am - August 1
- 4 spots, 7-8am, August 1
- 1 spot, 12:30-4:30pm, August 1

\$ 385.88

Total Invoice

\$ 385.88

EXHIBIT "D"

Suite 315
404)892-8946

DATE July 31, 1980

INVOICE NO 899-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS NET 10 DAYS

Media:

Radio Buy 7/31-8/4/80 - 20 spots on
each station

WALG - Albany	\$ 141.18	
WMES - Ashburn	45.88	
WAZA - Bainbridge	35.29	
WMGR - Bainbridge	48.47	
WBBK - Blakley	110.00	
WGRA - Cairo	58.82	
WCLB - Camilla	29.41	
WCUG - Cuthbert	70.59	
WDWD - Dawson	70.59	
WMGA - Moultrie	31.76	
WMJM - Cordele	34.70	
WMTM - Moultrie	41.17	
WRSG - Sylvester	29.40	
WLOR - Thomasville	60.00	
WPAX - Thomasville	45.88	
WCUP - Tifton	49.41	
WTIF - Tifton	47.06	
WNGS - Tifton	49.41	
WGAF - Valdosta	47.06	
WGOV - Valdosta	47.06	
WJEM - Valdosta	88.23	
WFLD - Valdosta	64.70	
WQDE - Albany	61.17	
Total Invoice		\$1307.24

EXHIBIT "D"

IN THE SUPERIOR COURT OF BERRIEN COUNTY
STATE OF GEORGIA

KLEIN-SIEB ADVERTISING, INC., §
Plaintiff § CIVIL ACTION FILE NO. _____
vs. §
HANSON R. CARTER and PERRY A. § ANSWER, DEFENSES AND
HARRIS, JR., § COUNTERCLAIM
Defendants §

I.

FIRST DEFENSE

The complaint fails to state a claim upon which relief can be granted-as to these defendants.

II.

SECOND DEFENSE
(RESPONSIVE ANSWERS)

1.

The defendants admit paragraph 1 of plaintiff's complaint.

2.

The defendants deny paragraph 2 of plaintiff's complaint.

3.

The defendants deny paragraph 3 of plaintiff's complaint.

COUNTERCLAIM

1.

The plaintiff is subject to the jurisdiction of this court.

2.

The plaintiff contracted for billboard space and other unauthorized expenditures in the amount \$17,500.00.

3.

Defendants have paid the plaintiff for these unauthorized expenditures, and these expenditures should be offset against the amount sued for by the plaintiff.

4.

The plaintiffs have failed and refused to render these monies back to the defendants.

EXHIBIT "E"

WHEREFORE the defendants demand judgment against the plaintiff,
plus interest and all court costs of this action in the amount of
\$17,500.00.

PERRY, FRANKLIN & MOORE, P. C.

By: 
J. Reese Franklin
Attorney for Defendants

P. O. Box 647
Nashville, Georgia 31639

Certificate of Service

The undersigned attorney for _____
Defendants

hereby certifies that he has this day served a copy of the fore-
going ANSWER, DEFENSES AND COUNTERCLAIM

_____ upon counsel of record for
Plaintiff

by mailing a copy of same to them, properly addressed and with
sufficient postage to:

Mr. Bob Reinhardt
Reinhardt, Whitley & Rogers, P. C.
P. O. Drawer 1287
Tifton, Georgia, 31793

Dated: September 10, ., 1981 .

PERRY, FRANKLIN, & MOORE, P. C.

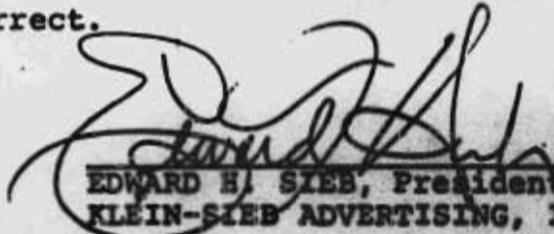
By: 
J. Reese Franklin
Attorney for Defendants

P. O. Box 647
Nashville, Georgia 31639
(912) 686-5591

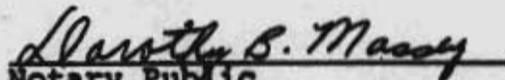
FEDERAL ELECTION COMMISSION

IN RE: The matter of Hanson R. Carter,
Perry A. Harris, Jr., and the
Hanson Carter for Congress
Campaign Committee (FEC Identifi-
cation No. 089176

Personally appeared before the undersigned attesting officer, duly authorized by law to administer oaths, comes EDWARD H. SIEB, President of KLEIN-SIEB ADVERTISING, INC., who, having first been duly sworn, deposed and said that he is authorized to make this affidavit on behalf of Klein-Sieb Advertising, Inc. and that the facts set forth in the within Complaint are true and correct.


EDWARD H. SIEB, President of
KLEIN-SIEB ADVERTISING, INC.

Sworn to and subscribed
before me this 3rd day
of February, 1982.


Notary Public

My Commission Expires: _____
[AFFIX NOTARIAL SEAL]

Notary Public, Georgia, State at Large
My Commission Expires April 29, 1983

204032156

CC# 4269

LAW OFFICES

PERRY, FRANKLIN & MOORE

PROFESSIONAL CORPORATION

110 NORTH DOSWOOD DRIVE

NASHVILLE, GEORGIA 31689-0647

W. S. PERRY
J. REESE FRANKLIN
MITCHELL O. MOORE

P. O. BOX 647
NASHVILLE
TN 37202-0647

2 MAR 4 AM 10:06

RECEIVED

February 26, 1982

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

RE: Mur 1427

Gentlemen:

Enclosed herewith you will please find Answers I would appreciate your filing on behalf of my clients, Hanson R. Carter, Perry A. Harris, Jr. and The Hanson Carter for Congress Campaign Committee. Enclosed also please find a copy of the Answers for your convenience in marking the pertinent filing information on same and returning to me in the enclosed stamped, self-addressed envelope.

Thanking you for your cooperation in this matter, I am

Sincerely,

J. Reese Franklin

JRF/bc

Enclosures

FEDERAL ELECTION COMMISSION

IN RE: The matter of Hanson R. Carter,
Perry A. Harris, Jr., and the
Hanson Carter for Congress Campaign
Committee (FEC Identification No.
089176)

RE: MUR 1427

2:44:41 AM: 07

RECEIVED
GENERAL COUNSEL

TO: GENERAL COUNSEL
FEDERAL ELECTION COMMISSION
1325 K Street, N. W.
Washington, D. C. 20463

COMES NOW HANSON R. CARTER, PERRY A. HARRIS, JR. and
THE HANSON CARTER FOR CONGRESS CAMPAIGN COMMITTEE, and files this its
Answer and shows as follows:

1.

Respondents admit the allegations alleged in Complain-
ant's paragraph No. 1.

2.

Respondents admit the allegations alleged in Complain-
ant's paragraph No. 2.

3.

Respondents admit the allegations alleged in Complain-
ant's paragraph No. 3, except the P. O. Box is 711, Nashville, Georgia,
31639.

4.

Respondents admit the allegations alleged in Complain-
ant's paragraph No. 4.

5.

Respondents did not enter into any formal written contract
with Complainants.

6.

Respondents deny the allegations alleged in Complain-
ant's paragraph No. 6. Repeated demands were made on Klein-Sieb for
original invoices of purchases made by Klein-Sieb on Respondent's behalf
to no avail .

7.

Respondents admit the allegations alleged in Complain-
ant's Paragraph 7. Respondents contend part of this was payment for

services unauthorized.

8.

Respondents admit the allegations alleged in Complain-paragraph No. 8, but the amount of the account is disputed.

9.

The amount of the debt was disputed and Respondents had continually requested itemized invoices for all expenditures, and all they ever received were letter-head invoices from Klein-Sieb and not original invoices. Respondents listed this as an outstanding invoice because they did not want to violate the Federal Election Commission Rules by leaving off invoices received although they were incorrect.

10.

Refer to Paragraph No. 9; Same

11.

Respondents deny the allegations alleged in Complainant's paragraph No. 11.

12.

Respondents admit the allegations alleged in Complain-paragraph No. 12 because the amount was not owed.

13.

Respondents admit the allegations alleged in Complainant's paragraph No. 13. The indebtedness not paid because amount disputed.

14.

Respondents admit the allegations alleged in Complainant's paragraph No. 14.

15.

Respondents admit the allegations alleged in Complainant's paragraph No. 15.

16.

Respondents deny the allegations alleged in Complainant's paragraph No. 16.

17.

Respondents deny the allegations alleged in Complainant's paragraph No. 17. Respondents deny accepting any contributions. Respondents were simply overcharged for the services rendered.

WHEREFORE, Respondents respectfully requests that the Federal Election Commission dismiss the Complaint.


J. Reese Franklin, Attorney for
Respondents

P. O. Box 125
Nashville, Georgia 31639

(912) 686-2394

Certificate of Service

The undersigned attorney for _____

Respondents

hereby certifies that he has this day served a copy of the fore-
going Answers

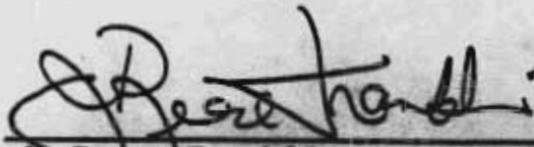
_____ upon counsel of record for

Complainants

by mailing a copy of same to them, properly addressed and with
sufficient postage to:

Mr. Henry M. Feinstein
Attorney at Law
Suite 950 Pharr Center
550 Pharr Road, N. E.
Atlanta, Georgia 30305

Dated: February 26, _____, 1982



J. Reese Franklin
Attorney for Respondents

LAW OFFICES
PERRY, FRANKLIN & MOORE

FEDERAL ELECTION COMMISSION
110 NORTH HENRY ROAD DRIVE
NASHVILLE, GEORGIA 31629-0047

W. S. PERRY
J. REESE FRANKLIN
MITCHELL G. MOORE

P. O. BOX 647
NASHVILLE
TN 37202-0647

February 26, 1982

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

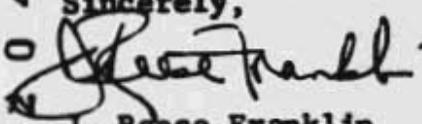
RE: Mur 1427

Gentlemen:

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Thanking you for your cooperation in this matter, I am

Sincerely,


J. Reese Franklin

JRF/bc

Enclosures

Gcc# 4269

LAW OFFICES
PERRY, FRANKLIN & MOORE
PROFESSIONAL CORPORATION
215 NORTH DOWNSIDE DRIVE
NASHVILLE, GEORGIA 31629-0647

W. S. PERRY
J. REESE FRANKLIN
MITCHELL G. MOORE

P. O. BOX 647
NASHVILLE
615-252-5881

RECEIVED
GENERAL COUNSEL
MAR 4 11:08

February 26, 1982

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

RE: Mur 1427

2
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Gentlemen:

Enclosed herewith you will please find Answers I would appreciate your filing on behalf of my clients, Hanson R. Carter, Perry A. Harris, Jr. and The Hanson Carter for Congress Campaign Committee. Enclosed also please find a copy of the Answers for your convenience in marking the pertinent filing information on same and returning to me in the enclosed stamped, self-addressed envelope.

Thanking you for your cooperation in this matter, I am

Sincerely,

J. Reese Franklin

JRF/bc

Enclosures

FEDERAL ELECTION COMMISSION

82 MAR 4 AM 1:07

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

IN RE: The matter of Hanson R. Carter,
Perry A. Harris, Jr., and the
Hanson Carter for Congress Campaign
Committee (FEC Identification No.
089176)

RE: MUR 1427

TO: GENERAL COUNSEL
FEDERAL ELECTION COMMISSION
1325 K Street, N. W.
Washington, D. C. 20463

COMES NOW HANSON R. CARTER, PERRY A. HARRIS, JR. and
THE HANSON CARTER FOR CONGRESS CAMPAIGN COMMITTEE, and files this its
Answer and shows as follows:

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The amount of the debt was disputed and Respondents had continually requested itemized invoices for all expenditures, and all they ever received were letter-head invoices from Klein-Sieb and not original invoices. Respondents listed this as an outstanding invoice because they did not want to violate the Federal Election Commission Rules by leaving off invoices received although they were incorrect.

10.

Refer to Paragraph No. 9; Same

11.

Respondents deny the allegations alleged in Complain-ant's paragraph No. 11.

12.

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15.

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16.

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17.

Respondents deny the allegations alleged in Complainant's paragraph No. 17. Respondents deny accepting any contributions. Respondents were simply overcharged for the services rendered.

WHEREFORE, Respondents respectfully requests that the Federal Election Commission dismiss the Complaint.


J. Reese Franklin, Attorney for
Respondents

P. O. Box 125
Nashville, Georgia 31639
(912) 686-2394

Certificate of Service

The undersigned attorney for _____

Respondents

hereby certifies that he has this day served a copy of the fore-
going **Answers**

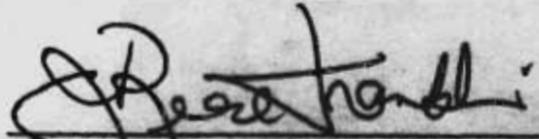
_____ upon counsel of record for

Complainants

by mailing a copy of same to them, properly addressed and with
sufficient postage to:

**Mr. Henry M. Feinstein
Attorney at Law
Suite 950 Pharr Center
550 Pharr Road, N. E.
Atlanta, Georgia 30305**

Dated: February 26, _____, 1982.



**J. Reese Franklin
Attorney for Respondents**

62040321517

Perry, Franklin & Moore, P. C.
Attorneys at Law
Post Office Box 647
Nashville, Ga. 31639-0647



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

CERTIFIED
P34 7751429
MAIL

82 MAR 3 P12:08

RECEIVED

20209 RECEIVED
COCH 7265
82 MAR 2 P 1:48

LAW OFFICES
PERRY, FRANKLIN & MOORE
PROFESSIONAL CORPORATION
110 NORTH DOGWOOD DRIVE
NASHVILLE, GEORGIA 31003-0047

82 MAR 2 P 3:19
F. O. BOX 617
GENERAL COUNSEL

W. S. PERRY
J. REESE FRANKLIN
MITCHELL G. MOORE

February 23, 1982

RETURN RECEIPT REQUESTED - CERTIFIED MAIL

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

RE: MUR 1427

Dear Mr. Steele:

This letter is to notify you that I have been retained by Hanson R. Carter and Perry A. Harris, Jr. and The Hanson Carter for Congress Campaign Committee in connection with the complaint, above referenced, filed by Henry M. Feinstien alleging violation of certain sections of the Federal Election Campaign Act of 1971.

I have enclosed "Statements of Designation of Counsel" which have been properly executed by Mr. Harris and Mr. Carter.

We will be filing an answer and will forward same to your office under separate cover.

Please direct all further correspondence on this matter to my office.

Thanking you, I am

Sincerely,

J. Reese Franklin
J. Reese Franklin
JRF/bc

CC: Mr. Hanson R. Carter
Mr. Perry A. Harris, Jr.

02040321518

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: J. REESE FRANKLIN

ADDRESS: P. O. Box 125
Nashville, Georgia 31639

TELEPHONE: (912) 686-2394

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and
other communications from the Commission and to act on my
behalf before the Commission.

2-23-82
Date

Perry A. Harris, Jr.
Signature

NAME: PERRY A. HARRIS, JR.
ADDRESS: P.O. Box 128, NASHVILLE, GA. 31639
HOME PHONE: 912-686-2133
BUSINESS PHONE: 912-686-7444

62040321519

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: J. REESE FRANKLIN

ADDRESS: P. O. BOX 125
Nashville, Georgia 31639

TELEPHONE: 912-686-2394

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and
other communications from the Commission and to act on my
behalf before the Commission.

2-22-82
Date

Hanson Carter
Signature

NAME: Hanson Carter

ADDRESS: P. O. Box 711
Nashville, Georgia 31639

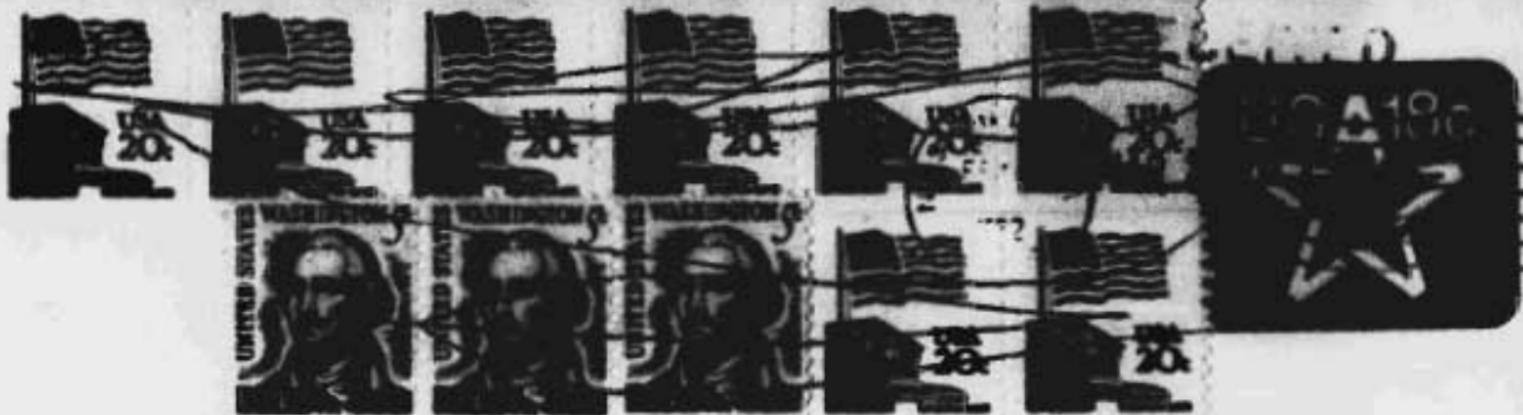
HOME PHONE: (912) 686-2515

BUSINESS PHONE: (912) 686-5527

62040321520

6204031521

Perry, Franklin & Moore, P. C.
Attorneys at Law
P. O. Box 647
110 N. Dogwood Drive
Nashville, Ga. 31639



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

CERTIFIED

P34 7751430

MAIL



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 10, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Hanson Carter
P.O. Box 645
Nashville, Georgia 31639

Re: MUR 1427

Dear Mr. Carter:

This letter is to notify you that on February 8, 1982 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 1427. 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 you 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, statement 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.

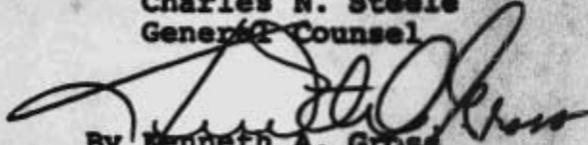
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

62040321522

If you have any questions, please contact Susan Donaldson, the staff member assigned to this matter at (202)-523-4175. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



By Kenneth A. Gross
Associate General Counsel

82040321523

Enclosures

- 1. Complaint
- 2. Procedures
- 4. Designation of Counsel Statement

1/16/82

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

- Show to whom and date delivered.....0
- Show to whom, date and address of delivery.....0
- RESTRICTED DELIVERY
Show to whom and date delivered.....0
- RESTRICTED DELIVERY
Show to whom, date, and address of delivery.....0

(CHECKLY POSTMASTER FOR FEES)

2. ARTICLE ADDRESS TO:
Hanson Carter
Nashville, GA

3. ARTICLE NUMBER(S):
REGISTERED NO. 943540

(Always obtain signature of addressee or agent)

I have received the article described above.
OPERATOR: Hanson Carter

4. DATE OF DELIVERY
2-17-82

5. ADDRESS (Number only if registered)

6. UNABLE TO DELIVER REASON:

FEB 17 1982

F. [Signature]



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 10, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Hanson Carter for Congress Campaign Committee
P.O. Box 711
Nashville, Georgia 31639

Re: MUR 1427

Dear Sir:

This letter is to notify you that on February 8, 1982 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 1427. 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.

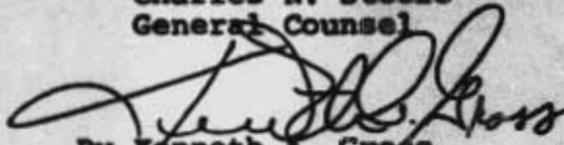
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

82040321524

If you have any questions, please contact Susan Donaldson, the staff member assigned to this matter at (202)-523-4175. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



By Kenneth A. Gross
Associate General Counsel

62040321525

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Counsel Statemen

1179 2/10/82

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

- Show to whom and date delivered.....0
- Show to whom, date and address of delivery.....0
- RESTRICTED DELIVERY
Show to whom and date delivered.....0
- RESTRICTED DELIVERY
Show to whom, date, and address of delivery.....0

(CONSULT FORMMASTER FOR FEES)

2. ARTICLES REFERRED TO
H. Carter for Congress Campaign
Nashville, GA
Carter

3. ARTICLES REFERRED TO

REGISTERED NO. 915538

(Always obtain signature of addressee or agent)

I have received the article described above

SIGNATURE *Hannah Carter* ADDRESS Nashville, GA

4. DATE OF DELIVERY 2-17-82

5. ADDRESS changed only if requested

6. UNABLE TO DELIVER REASON: *T. Ryan*

7. RETURN TO: *T. Ryan*

U.S. MAIL



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 10, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Perry A. Harris
c/o Citizens Bank
Nashville, Georgia 31639

Re: MUR 1427

Dear Mr. Harris:

This letter is to notify you that on February 8, 1982 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 1427. 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 you 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, statement 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.

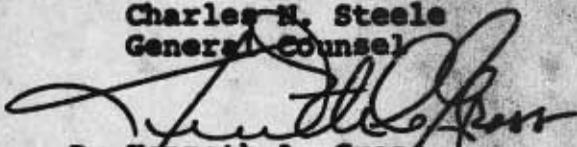
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

62040321926

If you have any questions, please contact Susan Donaldson, the staff member assigned to this matter at (202)-523-4175. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Charles H. Steele
General Counsel



By Kenneth A. Gross
Associate General Counsel

82040321527

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 9, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Henry M. Feinstein, Esquire
Suite 950 Pharr Center
550 Pharr Road, NE
Atlanta, Georgia 30305

Dear Mr. Feinstein:

This letter is to acknowledge receipt of your complaint of February 3, 1982, against Hanson R. Carter, Perry A. Harris, Jr., and The Hanson Carter for Congress Campaign Committee 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.

6 2 0 4 0 3 2 1 5 2 8

107 2/10/82

1. The following service is requested (check one):
 Show to whom and date delivered.
 Show to whom, date and address of delivery.
 SUBTRACTED DELIVERY
 Show to whom and date delivered.
 SUBTRACTED DELIVERY.
 Show to whom, date, and address of delivery.

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ASSIGNED TO:
 Mr. H. M. Feinstein, Esq.
 Atlanta, Georgia 30305

3. ADDRESS ONLY (SEE INSTRUCTIONS)
 525546

4. I have received the article described above.
 Signature: H. M. Feinstein
 Date of receipt: 2/10/82

5. ADDRESS ONLY (SEE INSTRUCTIONS)

6. ADDRESS TO WHICH RETURNED (SEE INSTRUCTIONS)

POST OFFICE BOX
 FEB 12 1982
 ATLANTA, GA

A. Kayson
 Kayson
 f

1023/ 82 FEB 8 P2:18

6004 7131

HENRY M. FEINSTEIN
ATTORNEY AT LAW
SUITE 880 PHARR CENTER
880 PHARR ROAD, N.E.
ATLANTA, GEORGIA 30308

TELEPHONE
AREA CODE 404
521-5300

February 3, 1982

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

CERTIFIED MAIL NO. 046605
RETURN RECEIPT REQUESTED

Re: Complaint against Hanson R. Carter,
Perry A. Harris, Jr., and The Hanson
Carter for Congress Campaign Committee

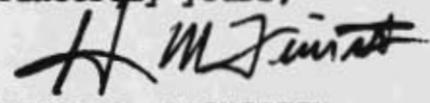
Dear Mr. Steele:

Pursuant to the rules of the Federal Election Commission,
I have enclosed herewith an original and three executed
copies of a formal Complaint against the above-named parties.
Please acknowledge receipt of this Complaint by stamping one
copy of the Complaint with the date and time of receipt and
returning it to the undersigned.

If you require any additional information in order to
commence action in connection with this matter, please
contact the undersigned directly.

With best regards.

Sincerely yours,



HENRY M. FEINSTEIN

HMF/rs

cc: Mr. Edward H. Sieb

02040321529

82 FEB 8 P4:09

8 2 0 4 0 3 2 1 3 0

RECEIVED

82 FEB 8 P2: 18

FEDERAL ELECTION COMMISSION

IN RE: The matter of Hanson R. Carter, Perry A. Harris, Jr., and the Lanson Carter for Congress Campaign Committee (FEC Identification No. 089176)

COMPLAINT

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

COMES NOW KLEIN-SIEB ADVERTISING, INC., a Georgia corporation, and files this its Complaint against Hanson R. Carter, Perry A. Harris, Jr., and The Hanson Carter for Congress Campaign Committee and shows as follows:

1.

Klein-Sieb Advertising, Inc. (hereinafter referred to as "Klein-Sieb") is a Georgia corporation engaged in the business of an advertising agency and a public relations firm.

2.

Klein-Sieb's office is located at Suite 302, 180 Allen Road, N.E., Atlanta, Georgia 30328. Klein-Sieb's telephone number is (404) 256-9605.

3.

Hanson R. Carter (hereinafter referred to as "Carter") is an individual resident of the County of Berrien, State of Georgia, who unsuccessfully ran in a primary election for Congress in the 2nd District of Georgia, in 1980. On information and belief Carter's address is Post Office Box 645, Nashville, Georgia 31639.

4.

The Hanson Carter for Congress Campaign Committee (hereinafter referred to as the "Campaign Committee"), whose FEC identification number is 089176, is an unincorporated association whose chairman was Carter and whose treasurer was Perry A. Harris, Jr., (hereinafter referred to as "Harris") also a resident of the County of Berrien, State of Georgia. On information and belief Harris' address is c/o Citizens Bank, Nashville, Georgia.

5.

Carter and the Campaign Committee contracted for the services of Klein-Sieb for assistance in raising funds, preparing election campaign material, and placing advertisements in the media.

6.

In the ordinary course of Klein-Sieb's business and on terms similar to extensions of credit to non-political debtors, Klein-Sieb provided the requested services, campaign material, and media placement, and subsequently rendered invoices for all such items.

7.

Klein-Sieb has received in payment \$29,898.10 for services, campaign material, and media placement.

8.

Klein-Sieb has sent the Campaign Committee twelve invoices, attached hereto as Exhibits "A", totaling \$17,869.54, which have not been paid. The Statement of Account summarizing the twelve invoices, dated July 22, 1980, is attached hereto as Exhibit "B".

9.

In the Report of Receipts and Disbursements filed by the Campaign Committee for the period from July 15, 1980,

through September 30, 1980, on Schedule D, the foregoing debt is set forth as \$17,869.54 and is undisputed.

10.

In the Report of Receipts and Disbursements for the period from October 1, 1980, through December 31, 1980, the foregoing debt is again set forth on Schedule D and again is undisputed.

11.

All services, campaign material, and media placement provided by Klein-Sieb were authorized by Carter and the Campaign Committee, and were accepted by Carter, Harris, and the Campaign Committee (with the possible exception of one month's use of billboards, which were mistakenly permitted to remain in use, but for which no charges were made).

12.

Carter, Harris, and the Campaign Committee has failed and refused to pay the foregoing amounts.

13.

Demand was made of Carter and Harris by letter dated April 7, 1981, a copy of which is attached as Exhibit "C". Carter and Harris have failed and refused to pay the indebtedness.

14.

On August 7, 1981, Klein-Sieb filed suit in the Superior Court of Berrien County, State of Georgia, against Carter and Harris. A copy of the Complaint is attached hereto as Exhibit "D".

15.

On September 10, 1981, Carter and Harris filed a pleading entitled "Answer, Defenses and Counterclaim", a copy of which is attached hereto as Exhibit "E", wherein for the

first time, Carter and Harris have stated that expenditures contracted for by Klein-Sieb on behalf of Carter were unauthorized.

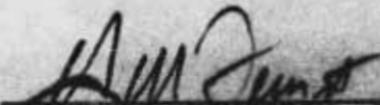
16.

All services rendered by Klein-Sieb, all campaign material obtained or produced by Klein-Sieb, and all media placements (except for one item set forth in Paragraph 11 above) were authorized by Carter and the Campaign Committee. All such items were accepted by Carter, Harris and the Campaign Committee.

17.

On the assumption that the allegations of the Answer, Defenses and Counterclaim of Carter and Harris are correct, i.e., that such expenditures were not authorized (which assertion is hereby denied), all of such expenditures were accepted by Carter, Harris and the Campaign Committee and, accordingly, from the point of view of Carter, Harris, and the Campaign Committee, such expenditures could only be deemed to be campaign contributions which are illegal under the provisions of 2 USCA §441a. and 2 USCA §441b.

WHEREFORE, Klein-Sieb hereby respectfully requests that the Federal Election Commission investigate the acceptance of expenditures by Carter, Harris, and the Campaign Committee as contributions in violation of the Federal Election Campaign Act of 1971, as amended, and the regulations promulgated thereunder.


HENRY M. FEINSTEIN, Attorney for
KLEIN-SIEB ADVERTISING, INC.

Suite 950 Pharr Center
550 Pharr Road, N.E.
Atlanta, Georgia 30305
(404) 231-2300

Klein-Sleb Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



Hanson Carter for Congress Campaign Committee
 Box 711
 Nashville, GA 31639

DATE May 23, 1980

INVOICE NO. 824-80

JOB
 NUMBER

TERMS: NET 10 DAYS

2012	<u>Campaign Brochure</u> Layout and Design, Mechanical Pasteup, Typography, Negatives, Printing (10,000)	\$1,727.53	
2017	<u>Campaign Mailing</u> Mechanical Pasteup, Typography and Stats, Printing and folding 1,650 letters, Printing 10,000 envelopes, Postage, 1650 pieces @ \$.28 each.	\$ 953.64	
	500 9" Balloons - Green and White "Hanson Carter for Congress"	119.88	
	<u>Photos</u> 17 4 x 5 color reprints, 8 proof sheets, 17 8 x 10 prints sent UPS, 44 3 1/2 x 5 color prints, 7 8 x 10 black and white prints, 2 1/2 hours photography	\$ 267.75	
	<u>Southern National</u> 30 Sheet Posters (Outdoor)	54.00	
	<u>Medical Association of Georgia</u> Labels	77.59	
	<u>Dependable Courier Services</u> Delivery Charges	74.55	
	Total Invoice		\$3,275.02

Klein-Sieb Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE June 6, 1980

INVOICE NO. 837-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS: NET 10 DAYS

275 Mini Billboards
 Mechanical Paste Up & Typography

\$ 430.00
 48.67

Total Invoice

\$ 478.67

Klein-Sieb Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE June 6, 1980

INVOICE NO. 838-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Ga. 31639

JOB
 NUMBER

TERMS NET 10 DAYS

1958	5,000 2/color Letterheads 5,000 Matching Envelopes Layout, Mechanical Paste Up, Typography - for letterheads & envelopes	\$ 525.00 266.00 106.17		
	Total Invoice		\$ 897.17	

Klein-Sieb Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE June 6, 1980

INVOICE NO. 839-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS: NET 10 DAYS

1960	5,000 Bumper Stickers (includes Layout, Design, Typography)	\$ 987.01	
	Total Invoice		\$ 987.01

Klein-Sieb Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE June 6, 1980

INVOICE NO. 840-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS: NET 10 DAYS

1949	10,000 Hand-Out Cards (includes Paste-Up & Typography)	\$ 246.26	
1824	5,000 Contribution Cards (includes Paste-Up & Typography)	\$ 185.79	
	Total Invoice		\$ 432.05

EXHIBIT "A"

Klein-Sieb Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE June 6, 1980
 INVOICE NO. 841-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS: NET 10 DAYS

2131	Three Signs for Valdosta Office 40"x60" 40"x120" 40"x140"	\$ 296.65	
1976	One 3'x12' Banner for Nashville Office	\$ 180.00	
703	Two 22"x8' Banners for Fire Truck	\$ 96.00	
	Total Invoice		\$ 572.65

EXHIBIT "A"

Klein-Sieb Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE June 6, 1980
 INVOICE NO. 842-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS NET 10 DAYS

<u>Miscellaneous</u>			
2003	Four - Congressional Badges	\$ 18.67	
1960	17 - Skimmers for Grand Opening	30.05	
1963	36 - T-Shirts with special design	294.01	
	Press Release - Folding, Mailing, Postage	62.60	
.62	Three Enlargements of Congressional District Maps - Dry Mounting	180.00	
	UPS Delivery Cost	15.20	
	Misc. Delivery Service, Shipping Charges	61.00	
	Five - 8x10 B&W Prints		
	25 - 4x5 B&W Prints		
	One - Internegative	154.64	
Total Invoice			\$ 816.17

Klein-Sieb Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE July 22, 1980

INVOICE NO. 877-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS: NET 10 DAYS

<p><u>Media:</u></p> <p><u>WCTV</u> 8 spots/week - w/o 7/14-7/18/80 and w/o 7/21-7/25/80</p> <p><u>WALB TV</u> 7 :30 spots w/o 7/14-7/18/80 and w/o 7/21-7/25/80</p>	<p>\$ 440.00</p> <p>\$ 1040.00</p>	<p>\$1,480.00</p>
<p>Total Invoice</p>		

2 0 4 0 3 2 1 5 2

Klein-Sieb Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE July 22, 1980

INVOICE NO. 878-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS: NET 10 DAYS

2129 2155	<u>Southern National</u> Paper for Outdoor Boards <u>Campaign Letters</u> Printing - 8,000 letters	\$ 2140.17 \$ 440.69	
Total Invoice		\$2,580.86	

EXHIBIT "A"

Klein-Sieb Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE July 24, 1980
 INVOICE NO. 885-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS: NET 10 DAYS

<u>Media:</u>			
<u>WALB TV - (Weeks of July 28, August 4)</u>			
1 spot, 6:30 a.m.-7:00 a.m. July 28,30,			
August 1,4			
1 spot, 7:00 a.m. - 9:00 a.m., July 29,31			
August 4			
1 spot, 12:00 noon - 1:00 p.m., July 28,30,			
August 1,4			
1 spot, 6:00 p.m. - 6:30 p.m., July 29,31,			
August 4			
1 spot, 11:30 p.m. to C.C., July 28,29,30,31,			
August 1,4			
1 spot, 9:00 p.m. - 11:00 p.m., August 4			
1 spot, 11:00 p.m. - 11:30 p.m., August 3			
1 spot, 7:30 p.m., July 28,30,31			
1 spot, 9:00 p.m., August 1			
1 spot, 7:00 p.m. - 8:00 p.m., August 2			
1 spot, 8:00 p.m., August 3			
Total 28 spots		\$ 3212.70	
<u>WCTV - (Weeks of July 28, August 4)</u>			
1 spot, 6:00 am - 7:00 am, July 28,30,			
August 1			
1 spot, 7:00am - 8:00 am, July 29,31			
1 spot, afternoon rotation, July 28, 30,			
August 1			
1 spot, 7:00pm - 8:00pm, July 29,31			
1 spot, 11:00pm to C.C., July 28,29,30,31,			
August 1			
1 spot, 8:00pm - 11:00pm, August 3			
Total 16 spots		\$ 974.12	
Production - WALB-TV		\$ 470.00	
Total Invoice		\$4,656.82	

Klein-Sleb Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE July 28, 1980

INVOICE NO. 889-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS: NET 40 DAYS

MCTV - (Week of July 29 - August 1)
 1 spot, 7-8pm July 19
 2 spots, 11:30pm - CC, July 19
 1 spot, 6-7am, July 30
 2 spots, 7-8am, July 30
 3 spots, 7-8pm, July 30
 4 spots, 9-11pm, July 30
 1 spot, 11:30pm - CC, July 30
 4 spots, 6-7am, July 31
 3 spots, 12:30-4:30pm, July 31
 2 spots, 9-10pm, July 31
 3 spots, 11:30 - CC, July 31
 3 spots, 6-7am - August 1
 4 spots, 7-8am, August 1
 1 spot, 12:30-4:30pm, August 1

\$ 385.88

Total Invoice

\$ 385.88

Klein-Sieb Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE July 31, 1980

INVOICE NO. 899-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS NET 10 DAYS

Media:

Radio Buy 7/31-8/4/80 - 20 spots on
each station

WALG - Albany	\$ 141.18
WNES - Ashburn	45.88
WAZA - Bainbridge	35.29
WMGR - Bainbridge	48.47
WBBK - Blakley	110.00
WGRA - Cairo	58.82
WCLB - Camilla	29.41
WCUG - Cuthbert	70.59
WDWD - Dawson	70.59
WMGA - Moultrie	31.76
WMJM - Cordele	34.70
WMTM - Moultrie	41.17
WRSG - Sylvester	29.40
WLOR - Thomasville	60.00
WPAX - Thomasville	45.88
WCUP - Tifton	49.41
WTIF - Tifton	47.06
WWSG - Tifton	49.41
WGAP - Valdosta	47.06
WGOV - Valdosta	47.06
WJEM - Valdosta	88.23
WFLD - Valdosta	64.70
WQDE - Albany	61.17

Total Invoice

\$1307.24

EXHIBIT "A"

8 2 0 4 0 3 2 1 4 6

Klein-Sieb Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE July 22, 1980

INVOICE NO

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS NET 10 DAYS

STATEMENT OF ACCOUNT

Invoice #826-80
Invoice #837-80
Invoice #838-80
Invoice #839-80
Invoice #840-80
Invoice #841-80
Invoice #842-80
Invoice #877-80
Invoice #878-80
Invoice #885-80
Invoice #889-80
Invoice #899-80

\$ 3275.02
478.67
897.17
987.01
432.05
572.65
816.17
1480.00
2580.86
4656.82
385.88
1307.24

Total Balance

\$17,869.54

EXHIBIT "B"

HENRY M. FEINSTEIN

ATTORNEY AT LAW
 SUITE 850 PHARR CENTER
 850 PHARR ROAD, N.E.
 ATLANTA, GEORGIA 30308

TELEPHONE
 AREA CODE 404
 521-2300

April 7, 1981

Honorable Hanson R. Carter
 Post Office Box 645
 Nashville, Georgia 31639

CERTIFIED MAIL NO. 046562
RETURN RECEIPT REQUESTED

Mr. Perry A. Harris, Jr.
 c/o Citizens Bank
 Nashville, Georgia 31639

CERTIFIED MAIL NO. 046563
RETURN RECEIPT REQUESTED

Gentlemen:

The undersigned represents Klein-Sieb Advertising, Inc., a Georgia corporation, to whom you are indebted in the amount of \$17,869.54.

Please be advised that my client has attempted with no success to establish a dialogue with Mr. Carter in order to establish an orderly schedule for the repayment of all outstanding amounts. Under the regulations of the Federal Election Commission Klein-Sieb Advertising, Inc. is required to pursue its "remedies in a manner similar in intensity to that employed by the corporation in pursuit of a non-political debtor, including lawsuits if filed in similar circumstances." (11 CFR 114.10).

You are hereby advised that under Georgia law you, as Chairman and Treasurer, respectively, of the Hanson Carter For Congress Campaign Committee, who authorized or subsequently ratified the transaction or obligation incurred by or on behalf of the committee, are individually jointly and severally liable as principals thereon. Accordingly, demand is herewith made that you immediately pay Klein-Sieb Advertising, Inc. the sum of \$17,869.54.

This letter shall also serve as notice that Klein-Sieb Advertising, Inc. shall exercise all of its rights and remedies under Georgia law against all parties liable for the aforesaid obligation if Klein-Sieb Advertising, Inc. has not received payment in full or if an acceptable repayment program is not initiated within ten (10) days from the receipt of this letter.

EXHIBIT "C"

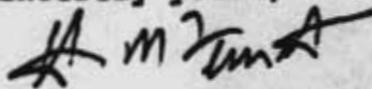
Honorable Hanson R. Carter
Mr. Perry A. Harris, Jr.
April 7, 1981
Page Two

Payment should be made directly to this office. All inquiries concerning this matter should be directed to the undersigned.

A copy of this letter is being sent to each of you by regular mail. Refusal of delivery or failure to accept delivery is deemed, under the law, to be the equivalent of notice.

Govern yourself accordingly.

Sincerely yours,



HENRY M. FEINSTEIN

HMF/vj

cc: Honorable Hanson R. Carter (by regular mail)
Mr. Perry A. Harris, Jr. (by regular mail)
Mr. Edward H. Sieb

EXHIBIT "C"

No. 046562

RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED—
 NOT FOR INTERNATIONAL MAIL.
 (See Reverse)

SENT TO		Hon. Hanson R. Carter	
STREET AND NO.		P. O. Box 645	
P.O., STATE AND ZIP CODE		Nashville, GA 31639	
POSTAGE		\$	
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE	¢	
	OPTIONAL SERVICES	SPECIAL DELIVERY	¢
		RESTRICTED DELIVERY	¢
		RETURN RECEIPT SERVICE	¢
	RETURN RECEIPT SERVICE	SHOW TO WHOM AND DATE DELIVERED	¢
		SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	¢
		SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	¢
	SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	¢	
TOTAL POSTAGE AND FEES		\$	
POSTMARK OR DATE			

PS Form 3800, Apr. 1976

No. 046563

RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED—
 NOT FOR INTERNATIONAL MAIL.
 (See Reverse)

SENT TO		Perry A. Harris, Jr.	
STREET AND NO.		c/o Citizens Bank	
P.O., STATE AND ZIP CODE		Nashville, GA 31639	
POSTAGE		\$	
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE	¢	
	OPTIONAL SERVICES	SPECIAL DELIVERY	¢
		RESTRICTED DELIVERY	¢
		RETURN RECEIPT SERVICE	¢
	RETURN RECEIPT SERVICE	SHOW TO WHOM AND DATE DELIVERED	¢
		SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	¢
		SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	¢
	SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	¢	
TOTAL POSTAGE AND FEES		\$	
POSTMARK OR DATE			

PS Form 3800, Apr. 1976

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:
 Perry A. Harris, Jr.
 c/o Citizens Bank
 Nashville, GA 31639

3. ARTICLE DESCRIPTION:
 REGISTERED NO. 046563 CERTIFIED NO. INQUIRED NO.

1. I have received the article described above.
 SIGNATURE: [Signature] ADDRESS: [Address]
 DATE OF DELIVERY: 4-29-81

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: [Blank] CLASSIFY MAIL

PS Form 3811, Aug. 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:
 Hon. Hanson R. Carter
 P. O. box 645
 Nashville, GA 31639

3. ARTICLE DESCRIPTION:
 REGISTERED NO. 046562 CERTIFIED NO. INQUIRED NO.

1. I have received the article described above.
 SIGNATURE: [Signature] ADDRESS: [Address]
 DATE OF DELIVERY: 4-5-81

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: [Blank] CLASSIFY MAIL

PS Form 3811, Aug. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

IN THE SUPERIOR COURT FOR THE COUNTY
OF BERRIEN, STATE OF GEORGIA

KLEIN-SIEB ADVERTISING, INC.,
Plaintiff,

VS.

HANSON R. CARTER and PERRY A.
HARRIS, JR.,
Defendants.

§
§
§
§
§
§
§
§

CIVIL ACTION NO. _____

COMPLAINT

1.

The defendants are residents of Berrien County, Georgia, and subject to the jurisdiction of this court.

2.

The defendants are jointly and severally liable to the plaintiff for \$17,869.54 for advertising services provided at their direction on behalf of the Hanson R. Carter Campaign for Congress, as shown upon the statements hereto attached as "Exhibit A".

3.

The defendants have failed and refused to pay for the services herein sued upon.

WHEREFORE, the plaintiff demands judgment against the defendants for \$17,869.54 plus interest and all costs of this action.

BOB REINHARDT
Reinhardt, Whitley & Rogers, P. C.
P. O. Drawer 1287
Tifton, Georgia 31793

attorneys for plaintiff

Klein-Sleb Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE July 22, 1980

INVOICE NO

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS NET 10 DAYS

STATEMENT OF ACCOUNT

Invoice #826-80	\$ 3275.02	
Invoice #837-80	478.67	
Invoice #838-80	897.17	
Invoice #839-80	987.01	
Invoice #840-80	432.05	
Invoice #841-80	572.65	
Invoice #842-80	816.17	
Invoice #877-80	1480.00	
Invoice #878-80	2580.86	
Invoice #885-80	4656.82	
Invoice #889-80	385.88	
Invoice #899-80	1307.24	

Total Balance

\$17,869.11

EXHIBIT A

EXHIBIT "D"

Klein-Siehl Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



Hanson Carter for Congress Campaign Committee
 Box 711
 Nashville, GA 31639

DATE May 23, 1980

INVOICE NO 826-50

JOB
 NUMBER

TERMS NET 10 DAYS

2012	<p><u>Campaign Brochure</u></p> <p>Layout and Design, Mechanical Pasteup, Typography, Negatives, Printing (10,000)</p>	\$1,727.53	
2017	<p><u>Campaign Mailing</u></p> <p>Mechanical Pasteup, Typography and Stats, Printing and folding 1,650 letters, Printing 10,000 envelopes, Postage, 1650 pieces @ \$.28 each.</p> <p>500 9" <u>Balloons</u> - Green and White "Hanson Carter for Congress"</p> <p><u>Photos</u></p> <p>17 4 x 5 color reprints, 8 proof sheets, 17 8 x 10 prints sent UPS, 44 3 1/2 x 5 color prints, 7 8 x 10 black and white prints, 2 1/2 hours photography</p> <p><u>Southern National</u></p> <p>30 Sheet Posters (Outdoor)</p> <p><u>Medical Association of Georgia</u></p> <p><u>Labels</u></p> <p><u>Dependable Courier Services</u></p> <p>Delivery Charges</p>	<p>\$ 953.64</p> <p>119.88</p> <p>\$ 267.75</p> <p>54.08</p> <p>77.39</p> <p>74.55</p>	
	Total Invoice		\$3,275.02

Klein-Sieb Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE June 6, 1980

INVOICE NO. 837-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS NET 10 DAYS

275 Mini Billboards Mechanical Paste Up & Typography	\$ 430.00 48.67	
Total Invoice		\$ 478.67

EXHIBIT "D"

Kleir Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE June 6, 1980

INVOICE NO 838-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Ga. 31639

JOB
 NUMBER

TERMS NET 10 DAYS

1958	5,000 2/color Letterheads 5,000 Matching Envelopes Layout, Mechanical Paste Up, Typography - for letterheads & envelopes	\$ 525.00 266.00 106.17	
	Total Invoice		\$ 897.17

EXHIBIT "D"

Klein-Sir Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE June 6, 1980

INVOICE NO. 839-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS NET 10 DAYS

1960	5,000 Bumper Stickers (Includes Layout, Design, Typography)	\$ 987.01	
Total Invoice			\$ 987.01

Klein-S Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE June 6, 1980
 INVOICE NO. 840+80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS NET 10 DAYS

1949	10,000 Hand-Out Cards (includes Paste-Up & Typography)	\$ 246.26	
1824	5,000 Contribution Cards (includes Paste-Up & Typography)	\$ 185.79	
Total Invoice		\$ 432.05	

Klein-Siel Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE June 6, 1980

INVOICE NO. 841-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS NET 10 DAYS

2131	Three Signs for Valdosta Office 40"x60" 40"x120" 40"x140"	\$ 296.65	
1976	One 3'x12' Banner for Nashville Office	\$ 180.00	
203	Two 22"x8' Banners for Fire Truck	\$ 96.00	
Total Invoice			\$ 572.65

EXHIBIT "D"

Klein-Sieb Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE June 6, 1980

INVOICE NO. 842-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS NET 10 DAYS

<u>Miscellaneous</u>			
2003	Four - Congressional Badges	\$	18.67
1960	17 - Skimmers for Grand Opening		30.05
1963	36 - T-Shirts with special design		294.01
	Press Release - Folding, Mailing, Postage		62.60
1962	Three Enlargements of Congressional District Maps - Dry Mounting		180.00
	UPS Delivery Cost		15.20
	Misc. Delivery Service, Shipping Charges		61.00
	Five - 8x10 B&W Prints		
	25 - 4x5 B&W Prints		
	One - Internegative		154.64
Total Invoice		\$	816.17

Klein-Sieh Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE July 22, 1980

INVOICE NO 877-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS NET 10 DAYS

<u>Media:</u>		
<u>WCTV</u> 8 spots/week - w/o 7/14-7/18/80 and w/o 7/21-7/25/80	\$ 440.00	
<u>WALB TV</u> 7 :30 spots w/o 7/14-7/18/80 and w/o 7/21-7/25/80	\$ 1040.00	
Total Invoice		\$1,480.00

EXHIBIT "D"

Klein Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE July 22, 1980

INVOICE NO. 878-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS NET 10 DAYS

	<p><u>Southern National</u> Paper for Outdoor Boards</p>	<p>\$ 2140.17</p>	
<p>2129 2155</p>	<p><u>Campaign Letters</u> Printing - 8,000 letters</p>	<p>\$ 440.69</p>	
	<p style="text-align: right;">Total Invoice</p>		<p>\$2,580.86</p>

EXHIBIT "D"

Atlanta, Georgia 30303
 Suite 315
 404) 892-8946



DATE July 24, 1980

INVOICE NO 885-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS NET 10 DAYS

<u>Media:</u>		
<u>WALB TV - (Weeks of July 28, August 4)</u>		
1 spot, 6:30 a.m.-7:00 a.m. July 28,30, August 1,4		
1 spot, 7:00 a.m. - 9:00 a.m., July 29,31 August 4		
1 spot, 12:00 noon - 1:00 p.m., July 28,30, August 1,4		
1 spot, 6:00 p.m. - 6:30 p.m., July 29,31, August 4		
1 spot, 11:30 p.m. to C.C., July 28,29,30,31, August 1,4		
1 spot, 9:00 p.m. - 11:00 p.m., August 4		
1 spot, 11:00 p.m. - 11:30 p.m., August 3		
1 spot, 7:30 p.m., July 28,30,31		
1 spot, 9:00 p.m., August 1		
1 spot, 7:00 p.m. - 8:00 p.m., August 2		
1 spot, 8:00 p.m., August 3		
Total 28 spots		\$ 3212.70
<u>WCTV - (Weeks of July 28, August 4)</u>		
1 spot, 6:00 am - 7:00 am, July 28,30, August 1		
1 spot, 7:00am - 8:00 am, July 29,31		
1 spot, afternoon rotation, July 28, 30, August 1		
1 spot, 7:00pm - 8:00pm, July 29,31		
1 spot, 11:00pm to C.C., July 28,29,30,31, August 1		
1 spot, 8:00pm - 11:00pm, August 3		
Total 16 spots		\$ 974.12
Production - WALB-TV		\$ 470.00
Total Invoice		\$4,656.82

Suite 315
104) 892-8946



DATE July 28, 1980

INVOICE NO. 889-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS NET 10 DAYS

WCTV - (Week of July 29 - August 1)
 1 spot, 7-8pm July 19
 2 spots, 11:30pm - CC, July 19
 1 spot, 6-7am, July 30
 2 spots, 7-8am, July 30
 3 spots, 7-8pm, July 30
 4 spots, 9-11pm, July 30
 1 spot, 11:30pm - CC, July 30
 4 spots, 6-7am, July 31
 3 spots, 12:30-4:30pm, July 31
 2 spots, 9-10pm, July 31
 3 spots, 11:30 - CC, July 31
 3 spots, 6-7am - August 1
 4 spots, 7-8am, August 1
 1 spot, 12:30-4:30pm, August 1

\$ 385.88

Total Invoice

\$ 385.88

Suite 315
404) 892-8946

DATE July 31, 1980

INVOICE NO 899-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS NET 10 DAYS

Media:

Radio Buy 7/31-8/4/80 - 20 spots on
each station

WALG - Albany	\$ 141.18	
WMES - Ashburn	45.88	
WAZA - Bainbridge	35.29	
WMGR - Bainbridge	48.47	
WBBK - Blakley	110.00	
WGRA - Cairo	58.82	
WCLB - Camilla	29.41	
WCUG - Cuthbert	70.59	
WDWD - Dawson	70.59	
WMGA - Moultrie	31.76	
WMJM - Cordele	34.70	
WMTM - Moultrie	41.17	
WRSG - Sylvester	29.40	
WLOR - Thomasville	60.00	
WPAX - Thomasville	45.88	
WCUP - Tifton	49.41	
WTIF - Tifton	47.06	
WWSG - Tifton	49.41	
WGAF - Valdosta	47.06	
WGOV - Valdosta	47.06	
WJEM - Valdosta	88.23	
WFLD - Valdosta	64.70	
WQDE - Albany	61.17	
Total Invoice		\$1307.24

EXHIBIT "D"

IN THE SUPERIOR COURT OF BERRIEN COUNTY
STATE OF GEORGIA

KLEIN-SIEB ADVERTISING, INC., §
Plaintiff § CIVIL ACTION FILE NO. _____
vs. §
HANSON R. CARTER and PERRY A. § ANSWER, DEFENSES AND
HARRIS, JR., § COUNTERCLAIM
Defendants §
§
I.

FIRST DEFENSE

The complaint fails to state a claim upon which relief can be granted as to these defendants.

II.

SECOND DEFENSE
(RESPONSIVE ANSWERS)

1.

The defendants admit paragraph 1 of plaintiff's complaint.

2.

The defendants deny paragraph 2 of plaintiff's complaint.

3.

The defendants deny paragraph 3 of plaintiff's complaint.

COUNTERCLAIM

1.

The plaintiff is subject to the jurisdiction of this court.

2.

The plaintiff contracted for billboard space and other unauthorized expenditures in the amount \$17,500.00.

3.

Defendants have paid the plaintiff for these unauthorized expenditures, and these expenditures should be offset against the amount sued for by the plaintiff.

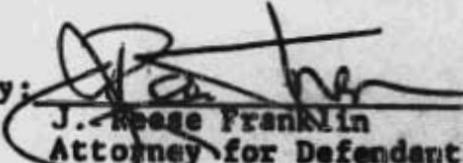
4.

The plaintiffs have failed and refused to render these monies back to the defendants.

EXHIBIT "E"

WHEREFORE the defendants demand judgment against the plaintiff,
plus interest and all court costs of this action in the amount of
\$17,500.00.

PERRY, FRANKLIN & MOORE, P. C.

By: 
J. Reese Franklin
Attorney for Defendants

P. O. Box 647
Nashville, Georgia 31639

Certificate of Service

The undersigned attorney for _____
Defendants

hereby certifies that he has this day served a copy of the fore-
going **ANSWER, DEFENSES AND COUNTERCLAIM**

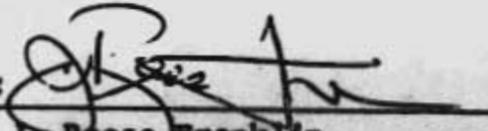
_____ upon counsel of record for
Plaintiff

by mailing a copy of same to them, properly addressed and with
sufficient postage to:

**Mr. Bob Reinhardt
Reinhardt, Whitley & Rogers, P. C.
P. O. Drawer 1287
Tifton, Georgia 31793**

Dated: September 10, _____, 1981.

PERRY, FRANKLIN, & MOORE, P. C.

By: 
**J. Reese Franklin
Attorney for Defendants**

**P. O. Box 647
Nashville, Georgia 31639
(912) 686-5591**

EXHIBIT "E"

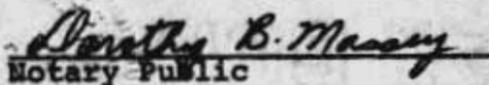
FEDERAL ELECTION COMMISSION

IN RE: The matter of Hanson R. Carter,
Perry A. Harris, Jr., and the
Hanson Carter for Congress
Campaign Committee (FEC Identifi-
cation No. 089176

Personally appeared before the undersigned attesting officer, duly authorized by law to administer oaths, comes EDWARD H. SIEB, President of KLEIN-SIEB ADVERTISING, INC., who, having first been duly sworn, deposed and said that he is authorized to make this affidavit on behalf of Klein-Sieb Advertising, Inc. and that the facts set forth in the within Complaint are true and correct.


EDWARD H. SIEB, President of
KLEIN-SIEB ADVERTISING, INC.

Sworn to and subscribed
before me this 3rd day
of February, 1982.


Notary Public

My Commission Expires:
[AFFIX NOTARIAL SEAL] Notary Public, Georgia, State at Large
My Commission Expires April 29, 1983

82 FEB 8 P2:16

FEDERAL ELECTION COMMISSION

IN RE: The matter of Hanson R. Carter,
Perry A. Harris, Jr., and the
Hanson Carter for Congress
Campaign Committee (FEC Identifi-
cation No. 089176)

COMPLAINT

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

COMES NOW KLEIN-SIEB ADVERTISING, INC., a Georgia corporation, and files this its Complaint against Hanson R. Carter, Perry A. Harris, Jr., and The Hanson Carter for Congress Campaign Committee and shows as follows:

1.

Klein-Sieb Advertising, Inc. (hereinafter referred to as "Klein-Sieb") is a Georgia corporation engaged in the business of an advertising agency and a public relations firm.

2.

Klein-Sieb's office is located at Suite 302, 180 Allen Road, N.E., Atlanta, Georgia 30328. Klein-Sieb's telephone number is (404) 256-9605.

3.

Hanson R. Carter (hereinafter referred to as "Carter") is an individual resident of the County of Berrien, State of Georgia, who unsuccessfully ran in a primary election for Congress in the 2nd District of Georgia, in 1980. On information and belief Carter's address is Post Office Box 645, Nashville, Georgia 31639.

4.

The Hanson Carter for Congress Campaign Committee (hereinafter referred to as the "Campaign Committee"), whose FEC identification number is 089176, is an unincorporated association whose chairman was Carter and whose treasurer was Perry A. Harris, Jr., (hereinafter referred to as "Harris") also a resident of the County of Berrien, State of Georgia. On information and belief Harris' address is c/o Citizens Bank, Nashville, Georgia.

5.

Carter and the Campaign Committee contracted for the services of Klein-Sieb for assistance in raising funds, preparing election campaign material, and placing advertisements in the media.

6.

In the ordinary course of Klein-Sieb's business and on terms similar to extensions of credit to non-political debtors, Klein-Sieb provided the requested services, campaign material, and media placement, and subsequently rendered invoices for all such items.

7.

Klein-Sieb has received in payment \$29,898.10 for services, campaign material, and media placement.

8.

Klein-Sieb has sent the Campaign Committee twelve invoices, attached hereto as Exhibits "A", totaling \$17,869.54, which have not been paid. The Statement of Account summarizing the twelve invoices, dated July 22, 1980, is attached hereto as Exhibit "B".

9.

In the Report of Receipts and Disbursements filed by the Campaign Committee for the period from July 15, 1980,

through September 30, 1980, on Schedule D, the foregoing debt is set forth as \$17,869.54 and is undisputed.

10.

In the Report of Receipts and Disbursements for the period from October 1, 1980, through December 31, 1980, the foregoing debt is again set forth on Schedule D and again is undisputed.

11.

All services, campaign material, and media placement provided by Klein-Sieb were authorized by Carter and the Campaign Committee, and were accepted by Carter, Harris, and the Campaign Committee (with the possible exception of one month's use of billboards, which were mistakenly permitted to remain in use, but for which no charges were made).

12.

Carter, Harris, and the Campaign Committee has failed and refused to pay the foregoing amounts.

13.

Demand was made of Carter and Harris by letter dated April 7, 1981, a copy of which is attached as Exhibit "C". Carter and Harris have failed and refused to pay the indebtedness.

14.

On August 7, 1981, Klein-Sieb filed suit in the Superior Court of Berrien County, State of Georgia, against Carter and Harris. A copy of the Complaint is attached hereto as Exhibit "D".

15.

On September 10, 1981, Carter and Harris filed a pleading entitled "Answer, Defenses and Counterclaim", a copy of which is attached hereto as Exhibit "E", wherein for the

first time, Carter and Harris have stated that expenditures contracted for by Klein-Sieb on behalf of Carter were unauthorized.

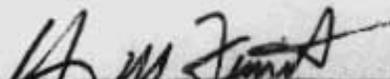
16.

All services rendered by Klein-Sieb, all campaign material obtained or produced by Klein-Sieb, and all media placements (except for one item set forth in Paragraph 11 above) were authorized by Carter and the Campaign Committee. All such items were accepted by Carter, Harris and the Campaign Committee.

17.

On the assumption that the allegations of the Answer, Defenses and Counterclaim of Carter and Harris are correct, i.e., that such expenditures were not authorized (which assertion is hereby denied), all of such expenditures were accepted by Carter, Harris and the Campaign Committee and, accordingly, from the point of view of Carter, Harris, and the Campaign Committee, such expenditures could only be deemed to be campaign contributions which are illegal under the provisions of 2 USCA §441a. and 2 USCA §441b.

WHEREFORE, Klein-Sieb hereby respectfully requests that the Federal Election Commission investigate the acceptance of expenditures by Carter, Harris, and the Campaign Committee as contributions in violation of the Federal Election Campaign Act of 1971, as amended, and the regulations promulgated thereunder.


 HENRY M. FEINSTEIN, Attorney for
 KLEIN-SIEB ADVERTISING, INC.

Suite 950 Pharr Center
 550 Pharr Road, N.E.
 Atlanta, Georgia 30305
 (404) 231-2300

Klein-Sieb Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



Hanson Carter for Congress Campaign Committee
 Box 711
 Nashville, GA 31639

DATE May 23, 1980

INVOICE NO. 826-80

JOB
 NUMBER

TERMS: NET 30 DAYS

012	<u>Campaign Brochure</u> Layout and Design, Mechanical Pasteup, Typography, Negatives, Printing (10,000)	\$1,727.53	
017	<u>Campaign Mailing</u> Mechanical Pasteup, Typography and Stats, Printing and folding 1,650 letters, Printing 10,000 envelopes, Postage, 1650 pieces @ \$.28 each.	\$ 953.64	
	<u>500 9" Balloons - Green and White</u> "Hanson Carter for Congress"	119.88	
	<u>Photos</u> 17 4 x 5 color reprints, 8 proof sheets, 17 8 x 10 prints sent UPS, 44 3 1/2 x 5 color prints, 7 8 x 10 black and white prints, 2 1/2 hours photography	\$ 267.75	
	<u>Southern National</u> 30 Sheet Posters (Outdoor)	54.08	
	<u>Medical Association of Georgia</u> Labels	77.59	
	<u>Dependable Courier Services</u> Delivery Charges	74.55	
	Total Invoice		\$3,275.02

8 2 0 4 0 3 2 1 5 7 4

Klein-Sleb Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE June 6, 1980
INVOICE NO. 837-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS: NET 10 DAYS

275 Mini Billboards Mechanical Paste Up & Typography	\$ 430.00 48.67	
Total Invoice		\$ 478.67

EXHIBIT "A"

8 2 0 4 0 3 2 1 5 7 5

Klein-Sieb Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE June 6, 1980

INVOICE NO. 838-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Ga. 31639

JOB
NUMBER

TERMS NET 10 DAYS

1958	5,000 2/color Letterheads	\$ 525.00	
	5,000 Matching Envelopes	266.00	
	Layout, Mechanical Paste Up, Typography - for letterheads & envelopes	106.17	
	Total Invoice		\$ 897.17

EXHIBIT "A"

8 2 0 4 0 3 2 1 5 7 6

Klein-Sieb Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE June 6, 1980

INVOICE NO. 839-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

TERMS: NET 10 DAYS

JOB
NUMBER

1960	5,000 Bumper Stickers (includes Layout, Design, Typography)	\$ 987.01		
	Total Invoice		\$ 987.01	

EXHIBIT "A"

2040321577

Klein-Sieb Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE June 6, 1980

INVOICE NO. 840-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS: NET 10 DAYS

1949	10,000 Hand-Out Cards (includes Paste-Up & Typography)	\$ 246.26	
1824	5,000 Contribution Cards (includes Paste-Up & Typography)	\$ 185.79	
	Total Invoice		\$ 432.05

EXHIBIT "A"

2 0 4 0 3 2 1 5 7 8

Klein-Sieb Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE June 6, 1980

INVOICE NO. 841-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS: NET 10 DAYS

2131	Three Signs for Valdosta Office 40"x60" 40"x120" 40"x140"	\$ 296.65	
1976	One 3'x12' Banner for Nashville Office	\$ 180.00	
703	Two 22"x8' Banners for Fire Truck	\$ 96.00	
	Total Invoice		\$ 572.65

EXHIBIT "A"

Klein-Sieb Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE June 6, 1980
 INVOICE NO. 842-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS: NET 10 DAYS

<u>Miscellaneous</u>			
2003	Four - Congressional Badges	\$	18.67
1960	17 - Skimmers for Grand Opening		30.05
1963	36 - T-Shirts with special design		294.01
	Press Release - Folding, Mailing, Postage		62.60
.62	Three Enlargements of Congressional District Maps - Dry Mounting		180.00
	UPS Delivery Cost		15.20
	Misc. Delivery Service, Shipping Charges		61.00
	Five - 8x10 B&W Prints		154.64
	25 - 4x5 B&W Prints		
	One - Internegative		
Total Invoice		\$	816.17

Klein-Sieb Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE July 22, 1980

INVOICE NO. 877-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS: NET 10 DAYS

<u>Media:</u>			
<u>WCTV</u>			
8 spots/week - w/o 7/14-7/18/80 and w/o 7/21-7/25/80		\$ 440.00	
<u>WALB TV</u>			
7 :30 spots w/o 7/14-7/18/80 and w/o 7/21-7/25/80		\$ 1040.00	
Total Invoice			\$1,480.00

8 2 0 4 0 3 2 1 5 8 1

Klein-Sieb Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE July 22, 1980

INVOICE NO. 878-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS: NET 10 DAYS

2129 2155	<u>Southern National</u> Paper for Outdoor Boards	\$ 2140.17	
	<u>Campaign Letters</u> Printing - 8,000 letters	\$ 440.69	
	Total Invoice		\$2,580.86

EXHIBIT "A"

Klein-Sieb Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE July 24, 1980

INVOICE NO. 885-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS: NET 10 DAYS

Media:WALB TV - (Weeks of July 28, August 4)

- 1 spot, 6:30 a.m.-7:00 a.m. July 28,30,
August 1,4
- 1 spot, 7:00 a.m. - 9:00 a.m., July 29,31
August 4
- 1 spot, 12:00 noon - 1:00 p.m., July 28,30,
August 1,4
- 1 spot, 6:00 p.m. - 6:30 p.m., July 29,31,
August 4
- 1 spot, 11:30 p.m. to C.C., July 28,29,30,31,
August 1,4
- 1 spot, 9:00 p.m. - 11:00 p.m., August 4
- 1 spot, 11:00 p.m. - 11:30 p.m., August 3
- 1 spot, 7:30 p.m., July 28,30,31
- 1 spot, 9:00 p.m., August 1
- 1 spot, 7:00 p.m. - 8:00 p.m., August 2
- 1 spot, 8:00 p.m., August 3

Total 28 spots

\$ 3212.70

WCTV - (Weeks of July 28, August 4)

- 1 spot, 6:00 am - 7:00 am, July 28,30,
August 1
- 1 spot, 7:00am - 8:00 am, July 29,31
- 1 spot, afternoon rotation, July 28, 30,
August 1
- 1 spot, 7:00pm - 8:00pm, July 29,31
- 1 spot, 11:00pm to C.C., July 28,29,30,31,
August 1
- 1 spot, 8:00pm - 11:00pm, August 3

Total 16 spots

\$ 974.12

Production - WALB-TV

\$ 470.00

Total Invoice

\$4,656.82

EXHIBIT "A"

8 2 0 4 0 3 2 1 5 8 3

Klein-Sieb Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE July 28, 1980

INVOICE NO. 889-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS: NET 10 DAYS

WCTV - (Week of July 29 - August 1)

- 1 spot, 7-8pm July 19
- 2 spots, 11:30pm - CC, July 19
- 1 spot, 6-7am, July 30
- 2 spots, 7-8am, July 30
- 3 spots, 7-8pm, July 30
- 4 spots, 9-11pm, July 30
- 1 spot, 11:30pm - CC, July 30
- 4 spots, 6-7am, July 31
- 3 spots, 12:30-4:30pm, July 31
- 2 spots, 9-10pm, July 31
- 3 spots, 11:30 - CC, July 31
- 3 spots, 6-7am - August 1
- 4 spots, 7-8am, August 1
- 1 spot, 12:30-4:30pm, August 1

\$ 385.88

Total Invoice

\$ 385.88

EXHIBIT "A"

8 2 0 4 0 3 2 1 5 8 4

Klein-Sieb Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE July 31, 1980

INVOICE NO. 899-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS: NET 10 DAYS

Media:

Radio Buy 7/31-8/4/80 - 20 spots on
 each station

WALG - Albany	\$ 141.18	
WMES - Ashburn	45.88	
WAZA - Bainbridge	35.29	
WMGR - Bainbridge	48.47	
WBBK - Blakley	110.00	
WGRA - Cairo	58.82	
WCLB - Camilla	29.41	
WCUG - Cuthbert	70.59	
WDWD - Dawson	70.59	
WMGA - Moultrie	31.76	
WMLM - Cordele	34.70	
WMTM - Moultrie	41.17	
WRSG - Sylvester	29.40	
WLOR - Thomasville	60.00	
WPAX - Thomasville	45.88	
WCUP - Tifton	49.41	
WTIF - Tifton	47.06	
WWGS - Tifton	49.41	
WGAP - Valdosta	47.06	
WGOV - Valdosta	47.06	
WJEM - Valdosta	88.23	
WFLD - Valdosta	64.70	
WQDE - Albany	61.17	
Total Invoice		\$1307.24

EXHIBIT "A"

2040321585

Klein-Sieb Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE July 22, 1980

INVOICE NO

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

CS
NUMBER

TERMS NET 10 DAYS

STATEMENT OF ACCOUNT

Invoice #826-80	\$ 3275.02
Invoice #837-80	478.67
Invoice #838-80	897.17
Invoice #839-80	987.01
Invoice #840-80	432.05
Invoice #841-80	572.65
Invoice #842-80	816.17
Invoice #877-80	1480.00
Invoice #878-80	2580.86
Invoice #885-80	4656.82
Invoice #889-80	385.88
Invoice #899-80	1307.24

Total Balance

\$17,869.54

EXHIBIT "B"

HENRY M. FEINSTEIN

ATTORNEY AT LAW

SUITE 880 PHARR CENTER

880 PHARR ROAD, N.E.

ATLANTA, GEORGIA 30308

April 7, 1981

TELEPHONE
AREA CODE 404
521-2200

Honorable Hanson R. Carter
Post Office Box 645
Nashville, Georgia 31639

CERTIFIED MAIL NO. 046562
RETURN RECEIPT REQUESTED

Mr. Perry A. Harris, Jr.
c/o Citizens Bank
Nashville, Georgia 31639

CERTIFIED MAIL NO. 046563
RETURN RECEIPT REQUESTED

Gentlemen:

The undersigned represents Klein-Sieb Advertising, Inc., a Georgia corporation, to whom you are indebted in the amount of \$17,869.54.

Please be advised that my client has attempted with no success to establish a dialogue with Mr. Carter in order to establish an orderly schedule for the repayment of all outstanding amounts. Under the regulations of the Federal Election Commission Klein-Sieb Advertising, Inc. is required to pursue its "remedies in a manner similar in intensity to that employed by the corporation in pursuit of a non-political debtor, including lawsuits if filed in similar circumstances." (11 CFR 114.10).

You are hereby advised that under Georgia law you, as Chairman and Treasurer, respectively, of the Hanson Carter For Congress Campaign Committee, who authorized or subsequently ratified the transaction or obligation incurred by or on behalf of the committee, are individually jointly and severally liable as principals thereon. Accordingly, demand is herewith made that you immediately pay Klein-Sieb Advertising, Inc. the sum of \$17,869.54.

This letter shall also serve as notice that Klein-Sieb Advertising, Inc. shall exercise all of its rights and remedies under Georgia law against all parties liable for the aforesaid obligation if Klein-Sieb Advertising, Inc. has not received payment in full or if an acceptable repayment program is not initiated within ten (10) days from the receipt of this letter.

EXHIBIT "C"

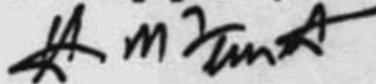
Honorable Hanson R. Carter
Mr. Perry A. Harris, Jr.
April 7, 1981
Page Two

Payment should be made directly to this office. All inquiries concerning this matter should be directed to the undersigned.

A copy of this letter is being sent to each of you by regular mail. Refusal of delivery or failure to accept delivery is deemed, under the law, to be the equivalent of notice.

Govern yourself accordingly.

Sincerely yours,



HENRY M. FEINSTEIN

HMF/vj

cc: Honorable Hanson R. Carter (by regular mail)
Mr. Perry A. Harris, Jr. (by regular mail)
Mr. Edward H. Sieb

EXHIBIT "C"

No. 046562

RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED—
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

SENT TO		Hon. Hanson R. Carter	
STREET AND NO.		P. O. Box 645	
P.O., STATE AND ZIP CODE		Nashville, GA 31639	
POSTAGE		\$	
CONSULT POSTMASTER FOR FEES	OPTIONAL SERVICES	CERTIFIED FEE	\$
		SPECIAL DELIVERY	\$
		RESTRICTED DELIVERY	\$
	RETURN RECEIPT SERVICE	SHOW TO WHOM AND DATE DELIVERED	\$
		SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	\$
		SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	\$
		SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	\$
TOTAL POSTAGE AND FEES		\$	
POSTMARK OR DATE			

PS Form 3800, Apr. 1976

No. 046563

RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED—
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

SENT TO		Perry A. Harris, Jr.	
STREET AND NO.		c/o Citizens Bank	
P.O., STATE AND ZIP CODE		Nashville, GA 31639	
POSTAGE		\$	
CONSULT POSTMASTER FOR FEES	OPTIONAL SERVICES	CERTIFIED FEE	\$
		SPECIAL DELIVERY	\$
		RESTRICTED DELIVERY	\$
	RETURN RECEIPT SERVICE	SHOW TO WHOM AND DATE DELIVERED	\$
		SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	\$
		SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	\$
		SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	\$
TOTAL POSTAGE AND FEES		\$	
POSTMARK OR DATE			

PS Form 3800, Apr. 1976

PS Form 3811, Aug. 1978

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:
 Perry A. Harris, Jr.
 c/o Citizens Bank
 Nashville, GA 31639

3. ARTICLE DESCRIPTION:
 REGISTERED NO. 046563 CERTIFIED NO. INSURED NO.

4. I have received the article described above.
 SIGNATURE: *Perry A. Harris, Jr.* ADDRESS: Addressee Agent
 DATE OF DELIVERY: 4-29-81 POSTMARK: NASHVILLE, GA
 5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: *RECEIVED*

PS Form 3811, Aug. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

PS Form 3811, Aug. 1978

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:
 Hon. Hanson R. Carter
 P. O. box 645
 Nashville, GA 31639

3. ARTICLE DESCRIPTION:
 REGISTERED NO. 046562 CERTIFIED NO. INSURED NO.

4. I have received the article described above.
 SIGNATURE: *Hanson R. Carter* ADDRESS: Addressee Authorized agent
 DATE OF DELIVERY: 4-5-81 POSTMARK: NASHVILLE, GA
 5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: *RECEIVED*

PS Form 3811, Aug. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

IN THE SUPERIOR COURT FOR THE COUNTY
OF BERRIEN, STATE OF GEORGIA

KLEIN-SIEB ADVERTISING, INC.,
Plaintiff,

VS.

HANSON R. CARTER and PERRY A.
HARRIS, JR.,
Defendants.

§
§
§
§
§
§
§

CIVIL ACTION NO. _____

COMPLAINT

1.

The defendants are residents of Berrien County, Georgia, and subject to the jurisdiction of this court.

2.

The defendants are jointly and severally liable to the plaintiff for \$17,869.54 for advertising services provided at their direction on behalf of the Hanson R. Carter Campaign for Congress, as shown upon the statements hereto attached as "Exhibit A".

3.

The defendants have failed and refused to pay for the services herein sued upon.

WHEREFORE, the plaintiff demands judgment against the defendants for \$17,869.54 plus interest and all costs of this action.

BOB REINHARDT
Reinhardt, Whitley & Rogers, P. C.
P. O. Drawer 1287
Tifton, Georgia 31793

attorneys for plaintiff

REINHARDT, WHITLEY
& ROGERS, P.C.
ATTORNEYS AT LAW
P. O. DRAWER 1287
TIFTON, GEORGIA 31793

8 2 0 4 0 3 2 1 5 9 1

Klein-Sleb Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE July 22, 1980

INVOICE NO

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

OS
NUMBER

TERMS NET 10 DAYS

STATEMENT OF ACCOUNT

Invoice #826-80
Invoice #837-80
Invoice #838-80
Invoice #839-80
Invoice #840-80
Invoice #841-80
Invoice #842-80
Invoice #877-80
Invoice #878-80
Invoice #885-80
Invoice #889-80
Invoice #899-80

\$ 3275.02
478.67
897.17
987.01
432.05
572.65
816.17
1480.00
2580.86
4656.82
385.88
1307.24

Total Balance

\$17,869.11

EXHIBIT A

EXHIBIT "D"

Klein-Siehl Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



Hanson Carter for Congress Campaign Committee
 Box 711
 Nashville, GA 31639

DATE May 23, 1980

INVOICE NO
 426-70

JOB
 NUMBER

TERMS NET 10 DAYS

2012	<u>Campaign Brochure</u> Layout and Design, Mechanical Pasteup, Typography, Negatives, Printing (10,000)	\$1,727.53	
2017	<u>Campaign Mailing</u> Mechanical Pasteup, Typography and Stats, Printing and folding 1,650 letters, Printing 10,000 envelopes, Postage, 1650 pieces @ \$.28 each.	\$ 953.64	
	<u>500 9" Balloons - Green and White</u> "Hanson Carter for Congress"	119.88	
	<u>Photos</u> 17 4 x 5 color reprints, 8 proof sheets, 17 8 x 10 prints sent UPS, 44 3 1/2 x 5 color prints, 7 8 x 10 black and white prints, 2 1/2 hours photography	\$ 267.75	
	<u>Southern National</u> 30 Sheet Posters (Outdoor)	54.08	
	<u>Medical Association of Georgia</u> Labels	77.39	
	<u>Dependable Courier Services</u> Delivery Charges	74.55	
	Total Invoice		63,275.02

EXHIBIT "D"

8 2 0 4 0 3 2 1 5 9 3

Klein-Sieb Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE June 6, 1980

INVOICE NO. 837-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS NET 10 DAYS

275 Mini Billboards
Mechanical Paste Up & Typography

\$ 430.00
48.67

Total Invoice

\$ 478.67

EXHIBIT "D"

8 2 0 4 0 3 2 1 5 9 4

Kleir Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE June 6, 1980

INVOICE NO 838-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Ga. 31639

JOB
NUMBER

TERMS NET 10 DAYS

1958	5,000 2/color Letterheads 5,000 Matching Envelopes Layout, Mechanical Paste Up, Typography - for letterheads & envelopes	\$ 525.00 266.00 106.17	\$ 897.17
	Total Invoice		

EXHIBIT "D"

8 2 0 4 0 3 2 1 5 9 5

Klein-Sir Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE June 6, 1980

INVOICE NO. 839-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS NET 10 DAYS

1960	5,000 Bumper Stickers (includes Layout, Design, Typography)	\$ 987.01	
	Total Invoice		\$ 987.01

EXHIBIT "D"

Klein-El Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE June 6, 1980

INVOICE NO. 840-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS NET 10 DAYS

1949	10,000 Hand-Out Cards (includes Paste-Up & Typography)	\$ 246.26	
1824	5,000 Contribution Cards (includes Paste-Up & Typography)	\$ 185.79	
	Total Invoice		\$ 432.05

EXHIBIT "D"

8 2 0 4 0 3 2 1 5 7

Klein-Siel Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE June 6, 1980

INVOICE NO. 841-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS NET 10 DAYS

2131	Three Signs for Valdosta Office 40"x60" 40"x120" 40"x140"	\$ 296.65
1976	One 3'x12' Banner for Nashville Office	\$ 180.00
203	Two 22"x8' Banners for Fire Truck	\$ 96.00
Total Invoice		\$ 572.65

EXHIBIT "D"

Klein-Siebert Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE June 6, 1980

INVOICE NO 842-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS NET 10 DAYS

JOB NUMBER	Description	Amount	Total
	<u>Miscellaneous</u>		
2003	Four - Congressional Badges	\$ 18.67	
1960	17 - Skimmers for Grand Opening	30.05	
1963	36 - T-Shirts with special design	294.01	
	Press Release - Folding, Mailing, Postage	62.60	
1962	Three Enlargements of Congressional District Maps - Dry Mounting	180.00	
	UPS Delivery Cost	15.20	
	Misc. Delivery Service, Shipping Charges	61.00	
	Five - 8x10 B&W Prints		
	25 - 4x5 B&W Prints		
	One - Internegative	154.64	
	Total Invoice		\$ 816.17

8 2 0 4 0 3 2 1 5 9 9

Klein-Sieh Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE July 22, 1980
INVOICE NO 877-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS NET 10 DAYS

<u>Media:</u>		
<u>WCTV</u>		
8 spots/week - w/o 7/14-7/18/80 and w/o 7/21-7/25/80	\$ 440.00	
<u>WALB TV</u>		
7 :30 spots w/o 7/14-7/18/80 and w/o 7/21-7/25/80	\$ 1040.00	
Total Invoice		\$1,480.00

EXHIBIT "D"

6 2 0 4 0 3 2 1 0 0

Klein Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE July 22, 1980

INVOICE NO. 878-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS NET 10 DAYS

2129	<u>Southern National</u> Paper for Outdoor Boards	\$ 2140.17	
2155	<u>Campaign Letters</u> Printing - 8,000 letters	\$ 440.69	
	Total Invoice		\$2,580.86

EXHIBIT "D"

Atlanta, Georgia 30309
 Suite 315
 404) 892-8946



DATE July 24, 1980

INVOICE NO 885-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS NET 10 DAYS

<u>Media:</u>			
<u>WALB TV - (Weeks of July 28, August 4)</u>			
1 spot, 6:30 a.m.-7:00 a.m. July 28,30,	August 1,4		
1 spot, 7:00 a.m. - 9:00 a.m., July 29,31	August 4		
1 spot, 12:00 noon - 1:00 p.m., July 28,30,	August 1,4		
1 spot, 6:00 p.m. - 6:30 p.m., July 29,31,	August 4		
1 spot, 11:30 p.m. to C.C., July 28,29,30,31,	August 1,4		
1 spot, 9:00 p.m. - 11:00 p.m., August 4			
1 spot, 11:00 p.m. - 11:30 p.m., August 3			
1 spot, 7:30 p.m., July 28,30,31			
1 spot, 9:00 p.m., August 1			
1 spot, 7:00 p.m. - 8:00 p.m., August 2			
1 spot, 8:00 p.m., August 3			
Total 28 spots		\$ 3212.70	
<u>WCTV - (Weeks of July 28, August 4)</u>			
1 spot, 6:00 am - 7:00 am, July 28,30,	August 1		
1 spot, 7:00am - 8:00 am, July 29,31			
1 spot, afternoon rotation, July 28, 30,	August 1		
1 spot, 7:00pm - 8:00pm, July 29,31			
1 spot, 11:00pm to C.C., July 28,29,30,31,	August 1		
1 spot, 8:00pm - 11:00pm, August 3			
Total 16 spots		\$ 974.12	
Production - WALB-TV		\$ 470.00	
Total Invoice		\$4,656.82	

Suite 315
104) 892-8946



DATE July 28, 1980

INVOICE NO. 889-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS: NET 10 DAYS

WCTV - (Week of July 29 - August 1)

1 spot, 7-8pm July 19
2 spots, 11:30pm - CC, July 19
1 spot, 6-7am, July 30
2 spots, 7-8am, July 30
3 spots, 7-8pm, July 30
4 spots, 9-11pm, July 30
1 spot, 11:30pm - CC, July 30
4 spots, 6-7am, July 31
3 spots, 12:30-4:30pm, July 31
2 spots, 9-10pm, July 31
3 spots, 11:30 - CC, July 31
3 spots, 6-7am - August 1
4 spots, 7-8am, August 1
1 spot, 12:30-4:30pm, August 1

\$ 385.88

Total Invoice

\$ 385.88

EXHIBIT "D"

Suite 315
404) 892-8946



DATE July 31, 1980

INVOICE NO 899-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS NET 10 DAYS

Media:

Radio Buy 7/31-8/4/80 - 20 spots on
each station

WALG - Albany	\$ 141.18
WMES - Ashburn	45.88
WAZA - Bainbridge	35.29
WMGR - Bainbridge	48.47
WBBK - Blakley	110.00
WGRA - Cairo	58.82
WCLB - Camilla	29.41
WCUG - Cuthbert	70.59
WDWD - Dawson	70.59
WMGA - Moultrie	31.76
WMLM - Cordele	34.70
WMTM - Moultrie	41.17
WRSB - Sylvester	29.40
WLOR - Thomasville	60.00
WPAX - Thomasville	45.88
WCUP - Tifton	49.41
WTIF - Tifton	47.06
WWGS - Tifton	49.41
WGAF - Valdosta	47.06
WGOV - Valdosta	47.06
WJEM - Valdosta	88.23
WFLD - Valdosta	64.70
WQDE - Albany	61.17

Total Invoice

\$1307.24

IN THE SUPERIOR COURT OF BERRIEN COUNTY
STATE OF GEORGIA

KLEIN-SIEB ADVERTISING, INC.,	§	
Plaintiff	§	CIVIL ACTION FILE NO. _____
vs.	§	
HANSON R. CARTER and PERRY A. HARRIS, JR.,	§	ANSWER, DEFENSES AND COUNTERCLAIM
Defendants	§	

I.

FIRST DEFENSE

The complaint fails to state a claim upon which relief can be granted as to these defendants.

II.

SECOND DEFENSE
(RESPONSIVE ANSWERS)

1.

The defendants admit paragraph 1 of plaintiff's complaint.

2.

The defendants deny paragraph 2 of plaintiff's complaint.

3.

The defendants deny paragraph 3 of plaintiff's complaint.

COUNTERCLAIM

1.

The plaintiff is subject to the jurisdiction of this court.

2.

The plaintiff contracted for billboard space and other unauthorized expenditures in the amount \$17,500.00.

3.

Defendants have paid the plaintiff for these unauthorized expenditures, and these expenditures should be offset against the amount sued for by the plaintiff.

4.

The plaintiffs have failed and refused to render these monies back to the defendants.

WHEREFORE the defendants demand judgment against the plaintiff,
plus interest and all court costs of this action in the amount of
\$17,500.00.

PERRY, FRANKLIN & MOORE, P. C.

By: 
J. Neese Franklin
Attorney for Defendants

P. O. Box 647
Nashville, Georgia 31639

Certificate of Service

The undersigned attorney for _____
Defendants

hereby certifies that he has this day served a copy of the fore-
going ANSWER, DEFENSES AND COUNTERCLAIM

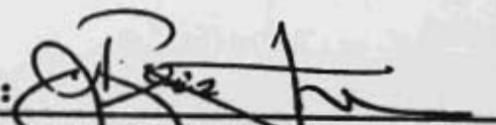
_____ upon counsel of record for
Plaintiff

by mailing a copy of same to them, properly addressed and with
sufficient postage to:

Mr. Bob Reinhardt
Reinhardt, Whitley & Rogers, P. C.
P. O. Drawer 1287
Tifton, Georgia 31793

Dated: September 10, _____, 1981.

PERRY, FRANKLIN, & MOORE, P. C.

By: 
J. Reese Franklin
Attorney for Defendants

P. O. Box 647
Nashville, Georgia 31639
(912) 686-5591

EXHIBIT "E"

FEDERAL ELECTION COMMISSION

IN RE: The matter of Hanson R. Carter,
Perry A. Harris, Jr., and the
Hanson Carter for Congress
Campaign Committee (FEC Identifi-
cation No. 089176

Personally appeared before the undersigned attesting officer, duly authorized by law to administer oaths, comes EDWARD H. SIEB, President of KLEIN-SIEB ADVERTISING, INC., who, having first been duly sworn, deposed and said that he is authorized to make this affidavit on behalf of Klein-Sieb Advertising, Inc. and that the facts set forth in the within Complaint are true and correct.


EDWARD H. SIEB, President of
KLEIN-SIEB ADVERTISING, INC.

Sworn to and subscribed
before me this 3rd day
of February, 1982.


Notary Public

My Commission Expires:
[AFFIX NOTARIAL SEAL]

Notary Public, Georgia, State at Large
My Commission Expires April 29, 1983

10283/ FEB 08 P2:16
6cc# 7131

HENRY M. FEINSTEIN
ATTORNEY AT LAW
SUITE 980 PHARR CENTER
880 PHARR ROAD, N.E.
ATLANTA, GEORGIA 30308

TELEPHONE
AREA CODE 404
521-2200

February 3, 1982

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

CERTIFIED MAIL NO. 046605
RETURN RECEIPT REQUESTED

Re: Complaint against Hanson R. Carter,
Perry A. Harris, Jr., and The Hanson
Carter for Congress Campaign Committee

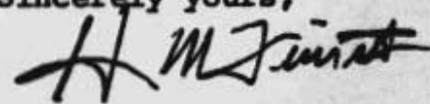
Dear Mr. Steele:

Pursuant to the rules of the Federal Election Commission, I have enclosed herewith an original and three executed copies of a formal Complaint against the above-named parties. Please acknowledge receipt of this Complaint by stamping one copy of the Complaint with the date and time of receipt and returning it to the undersigned.

If you require any additional information in order to commence action in connection with this matter, please contact the undersigned directly.

With best regards.

Sincerely yours,



HENRY M. FEINSTEIN

HMF/rs

cc: Mr. Edward H. Sieb

82040321608

FEB 08 04:00

RECEIVED

82 FEB 8 P2:16

FEDERAL ELECTION COMMISSION

IN RE: The matter of Hanson R. Carter,
Perry A. Harris, Jr., and the
Hanson Carter for Congress
Campaign Committee (FEC Identifi-
cation No. 089176)

COMPLAINT

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

COMES NOW KLEIN-SIEB ADVERTISING, INC., a Georgia corporation, and files this its Complaint against Hanson R. Carter, Perry A. Harris, Jr., and The Hanson Carter for Congress Campaign Committee and shows as follows:

1.

Klein-Sieb Advertising, Inc. (hereinafter referred to as "Klein-Sieb") is a Georgia corporation engaged in the business of an advertising agency and a public relations firm.

2.

Klein-Sieb's office is located at Suite 302, 180 Allen Road, N.E., Atlanta, Georgia 30328. Klein-Sieb's telephone number is (404) 256-9605.

3.

Hanson R. Carter (hereinafter referred to as "Carter") is an individual resident of the County of Berrien, State of Georgia, who unsuccessfully ran in a primary election for Congress in the 2nd District of Georgia, in 1980. On information and belief Carter's address is Post Office Box 645, Nashville, Georgia 31639.

4.

The Hanson Carter for Congress Campaign Committee (hereinafter referred to as the "Campaign Committee"), whose FEC identification number is 089176, is an unincorporated association whose chairman was Carter and whose treasurer was Perry A. Harris, Jr., (hereinafter referred to as "Harris") also a resident of the County of Berrien, State of Georgia. On information and belief Harris' address is c/o Citizens Bank, Nashville, Georgia.

5.

Carter and the Campaign Committee contracted for the services of Klein-Sieb for assistance in raising funds, preparing election campaign material, and placing advertisements in the media.

6.

In the ordinary course of Klein-Sieb's business and on terms similar to extensions of credit to non-political debtors, Klein-Sieb provided the requested services, campaign material, and media placement, and subsequently rendered invoices for all such items.

7.

Klein-Sieb has received in payment \$29,898.10 for services, campaign material, and media placement.

8.

Klein-Sieb has sent the Campaign Committee twelve invoices, attached hereto as Exhibits "A", totaling \$17,869.54, which have not been paid. The Statement of Account summarizing the twelve invoices, dated July 22, 1980, is attached hereto as Exhibit "B".

9.

In the Report of Receipts and Disbursements filed by the Campaign Committee for the period from July 15, 1980,

through September 30, 1980, on Schedule D, the foregoing debt is set forth as \$17,869.54 and is undisputed.

10.

In the Report of Receipts and Disbursements for the period from October 1, 1980, through December 31, 1980, the foregoing debt is again set forth on Schedule D and again is undisputed.

11.

All services, campaign material, and media placement provided by Klein-Sieb were authorized by Carter and the Campaign Committee, and were accepted by Carter, Harris, and the Campaign Committee (with the possible exception of one month's use of billboards, which were mistakenly permitted to remain in use, but for which no charges were made).

12.

Carter, Harris, and the Campaign Committee has failed and refused to pay the foregoing amounts.

13.

Demand was made of Carter and Harris by letter dated April 7, 1981, a copy of which is attached as Exhibit "C". Carter and Harris have failed and refused to pay the indebtedness.

14.

On August 7, 1981, Klein-Sieb filed suit in the Superior Court of Berrien County, State of Georgia, against Carter and Harris. A copy of the Complaint is attached hereto as Exhibit "D".

15.

On September 10, 1981, Carter and Harris filed a pleading entitled "Answer, Defenses and Counterclaim", a copy of which is attached hereto as Exhibit "E", wherein for the

first time, Carter and Harris have stated that expenditures contracted for by Klein-Sieb on behalf of Carter were unauthorized.

16.

All services rendered by Klein-Sieb, all campaign material obtained or produced by Klein-Sieb, and all media placements (except for one item set forth in Paragraph 11 above) were authorized by Carter and the Campaign Committee. All such items were accepted by Carter, Harris and the Campaign Committee.

17.

On the assumption that the allegations of the Answer, Defenses and Counterclaim of Carter and Harris are correct, i.e., that such expenditures were not authorized (which assertion is hereby denied), all of such expenditures were accepted by Carter, Harris and the Campaign Committee and, accordingly, from the point of view of Carter, Harris, and the Campaign Committee, such expenditures could only be deemed to be campaign contributions which are illegal under the provisions of 2 USCA §441a. and 2 USCA §441b.

WHEREFORE, Klein-Sieb hereby respectfully requests that the Federal Election Commission investigate the acceptance of expenditures by Carter, Harris, and the Campaign Committee as contributions in violation of the Federal Election Campaign Act of 1971, as amended, and the regulations promulgated thereunder.


HENRY M. FEINSTEIN, Attorney for
KLEIN-SIEB ADVERTISING, INC.

Suite 950 Pharr Center
550 Pharr Road, N.E.
Atlanta, Georgia 30305
(404) 231-2300

Klein-Sleb Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



Hanson Carter for Congress Campaign Committee
 Box 711
 Nashville, GA 31639

DATE May 23, 1980

INVOICE NO. 826-80

JOB NUMBER

TERMS: NET 10 DAYS

012	<p><u>Campaign Brochure</u></p> <p>Layout and Design, Mechanical Pasteup, Typography, Negatives, Printing (10,000)</p>	\$1,727.53	
017	<p><u>Campaign Mailing</u></p> <p>Mechanical Pasteup, Typography and Stats, Printing and folding 1,650 letters, Printing 10,000 envelopes, Postage, 1650 pieces @ \$.28 each.</p> <p>500 9"Balloons - Green and White</p> <p>"Hanson Carter for Congress"</p> <p><u>Photos</u></p> <p>17 4 x 5 color reprints, 8 proof sheets, 17 8 x 10 prints sent UPS, 44 3 1/2 x 5 color prints, 7 8 x 10 black and white prints, 2 1/2 hours photography</p> <p><u>Southern National</u></p> <p>30 Sheet Posters (Outdoor)</p> <p><u>Medical Association of Georgia</u></p> <p>Labels</p> <p><u>Dependable Courier Services</u></p> <p>Delivery Charges</p>	<p>\$ 953.64</p> <p>119.88</p> <p>\$ 267.75</p> <p>54.08</p> <p>77.59</p> <p>74.55</p>	
	Total Invoice		\$3,275.02

● B 2 0 4 0 3 2 1 6 ● 4

Klein-Sieb Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE June 6, 1980

INVOICE NO. 837-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS: NET 10 DAYS

275 Mini Billboards Mechanical Paste Up & Typography	\$ 430.00 48.67	
Total Invoice		\$ 478.67

EXHIBIT "A"

8 2 0 4 0 3 2 1 6 5

Klein-Sieb Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE June 6, 1980

INVOICE NO. 838-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Ga. 31639

JOB
NUMBER

TERMS NET 10 DAYS

1958	5,000 2/color Letterheads 5,000 Matching Envelopes Layout, Mechanical Paste Up, Typography - for letterheads & envelopes	\$ 525.00 266.00 106.17		
	Total Invoice			\$ 897.17

EXHIBIT "A"

8 2 0 4 0 3 2 1 6 6

Klein-Sieb Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE June 6, 1980

INVOICE NO. 839-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS: NET 10 DAYS

1960	5,000 Bumper Stickers (includes Layout, Design, Typography)	\$ 987.01		
	Total Invoice		\$ 987.01	

EXHIBIT "A"

Klein-Sieb Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE June 6, 1980

INVOICE NO. 840-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS: NET 10 DAYS

1949	10,000 Hand-Out Cards (includes Paste-Up & Typography)	\$ 246.26	
1824	5,000 Contribution Cards (includes Paste-Up & Typography)	\$ 185.79	
Total Invoice			\$ 432.05

Klein-Sieb Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE June 6, 1980

INVOICE NO. 841-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS: NET 10 DAYS

2131	Three Signs for Valdosta Office 40" x 60" 40" x 120" 40" x 140"	\$ 296.65	
1976	One 3'x12' Banner for Nashville Office	\$ 180.00	
203	Two 22"x8' Banners for Fire Truck	\$ 96.00	
Total Invoice			\$ 572.65

Klein-Sieb Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE June 6, 1980
 INVOICE NO. 842-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS: NET 10 DAYS

<u>Miscellaneous</u>			
2003	Four - Congressional Badges	\$	18.67
1960	17 - Skimmers for Grand Opening		30.05
1963	36 - T-Shirts with special design		294.01
	Press Release - Folding, Mailing, Postage		62.60
62	Three Enlargements of Congressional District Maps - Dry Mounting		180.00
	UPS Delivery Cost		15.20
	Misc. Delivery Service, Shipping Charges		61.00
	Five - 8x10 B&W Prints		
	25 - 4x5 B&W Prints		
	One - Internegative		154.64
Total Invoice		\$	816.17

Klein-Sieb Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE July 22, 1980

INVOICE NO. 877-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS: NET 10 DAYS

<u>Media:</u>			
<u>WCTV</u>			
8 spots/week - w/o 7/14-7/18/80 and w/o 7/21-7/25/80		\$ 440.00	
<u>WALB TV</u>			
7 :30 spots w/o 7/14-7/18/80 and w/o 7/21-7/25/80		\$ 1040.00	
Total Invoice			\$1,480.00

Klein-Sieb Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE July 22, 1980

INVOICE NO. 878-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS: NET 40 DAYS

<p>2129 2155</p>	<p><u>Southern National</u> <u>Paper for Outdoor Boards</u></p> <p>Campaign Letters Printing - 8,000 letters</p>	<p>\$ 2140.17</p> <p>\$ 440.69</p>		
<p style="text-align: right;">Total Invoice</p>			<p>\$2,580.86</p>	

EXHIBIT "A" 99

Klein-Sieb Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE July 24, 1980
 INVOICE NO. 885-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS: NET 10 DAYS

<u>Media:</u>			
<u>WALB TV - (Weeks of July 28, August 4)</u>			
1 spot, 6:30 a.m.-7:00 a.m. July 28,30, August 1,4			
1 spot, 7:00 a.m. - 9:00 a.m., July 29,31 August 4			
1 spot, 12:00 noon - 1:00 p.m., July 28,30, August 1,4			
1 spot, 6:00 p.m. - 6:30 p.m., July 29,31, August 4			
1 spot, 11:30 p.m. to C.C., July 28,29,30,31, August 1,4			
1 spot, 9:00 p.m. - 11:00 p.m., August 4			
1 spot, 11:00 p.m. - 11:30 p.m., August 3			
1 spot, 7:30 p.m., July 28,30,31			
1 spot, 9:00 p.m., August 1			
1 spot, 7:00 p.m. - 8:00 p.m., August 2			
1 spot, 8:00 p.m., August 3			
Total 28 spots		\$ 3212.70	
<u>MCTV - (Weeks of July 28, August 4)</u>			
1 spot, 6:00 am - 7:00 am, July 28,30, August 1			
1 spot, 7:00am - 8:00 am, July 29,31			
1 spot, afternoon rotation, July 28, 30, August 1			
1 spot, 7:00pm - 8:00pm, July 29,31			
1 spot, 11:00pm to C.C., July 28,29,30,31, August 1			
1 spot, 8:00pm - 11:00pm, August 3			
Total 16 spots		\$ 974.12	
Production - WALB-TV		\$ 470.00	
Total Invoice			\$4,656.82

Klein-Sieb Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE: July 28, 1980
 INVOICE NO. 889-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS: NET 10 DAYS

WCTV - (Week of July 29 - August 1) 1 spot, 7-8pm July 19 2 spots, 11:30pm - CC, July 19 1 spot, 6-7am, July 30 2 spots, 7-8am, July 30 3 spots, 7-8pm, July 30 4 spots, 9-11pm, July 30 1 spot, 11:30pm - CC, July 30 4 spots, 6-7am, July 31 3 spots, 12:30-4:30pm, July 31 2 spots, 9-10pm, July 31 3 spots, 11:30 - CC, July 31 3 spots, 6-7am - August 1 4 spots, 7-8am, August 1 1 spot, 12:30-4:30pm, August 1	\$ 385.88
Total Invoice	\$ 385.88

Klein-Sieb Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE July 31, 1980

INVOICE NO. 899-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS NET 10 DAYS

<u>Media:</u>		
Radio Buy 7/31-8/4/80 - 20 spots on each station		
WALG - Albany		\$ 141.18
WMES - Ashburn		45.88
WAZA - Bainbridge		35.29
WMGR - Bainbridge		48.47
WBBK - Blakley		110.00
WGRA - Cairo		58.82
WCLB - Camilla		29.41
WCUG - Cuthbert		70.59
WDWD - Dawson		70.59
WMGA - Moultrie		31.76
WMJM - Cordele		34.70
WMTM - Moultrie		41.17
WRSG - Sylvester		29.40
WLOR - Thomasville		60.00
WPAX - Thomasville		45.88
WCUP - Tifton		49.41
WTIF - Tifton		47.06
WNGS - Tifton		49.41
WGAP - Valdosta		47.06
WGOV - Valdosta		47.06
NJEM - Valdosta		88.23
WFLD - Valdosta		64.70
WQDE - Albany		61.17
Total Invoice		\$1307.24

Klein-Sleb Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE July 22, 1980

INVOICE NO

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

OS
 NUMBER

TERMS NET 10 DAYS

STATEMENT OF ACCOUNT

Invoice #826-80	\$ 3275.02	
Invoice #837-80	478.67	
Invoice #838-80	897.17	
Invoice #839-80	987.03	
Invoice #840-80	432.05	
Invoice #841-80	572.65	
Invoice #842-80	816.17	
Invoice #877-80	1480.00	
Invoice #878-80	2580.86	
Invoice #885-80	4656.82	
Invoice #889-80	385.88	
Invoice #899-80	1307.24	

Total Balance

\$17,869.54

EXHIBIT "B"

HENRY M. FEINSTEIN
 ATTORNEY AT LAW
 SUITE 850 PHARR CENTER
 850 PHARR ROAD, N.E.
 ATLANTA, GEORGIA 30308

TELEPHONE
 AREA CODE 404
 531-2300

April 7, 1981

Honorable Hanson R. Carter
 Post Office Box 645
 Nashville, Georgia 31639

CERTIFIED MAIL NO. 046562
RETURN RECEIPT REQUESTED

Mr. Perry A. Harris, Jr.
 c/o Citizens Bank
 Nashville, Georgia 31639

CERTIFIED MAIL NO. 046563
RETURN RECEIPT REQUESTED

Gentlemen:

The undersigned represents Klein-Sieb Advertising, Inc., a Georgia corporation, to whom you are indebted in the amount of \$17,869.54.

Please be advised that my client has attempted with no success to establish a dialogue with Mr. Carter in order to establish an orderly schedule for the repayment of all outstanding amounts. Under the regulations of the Federal Election Commission Klein-Sieb Advertising, Inc. is required to pursue its "remedies in a manner similar in intensity to that employed by the corporation in pursuit of a non-political debtor, including lawsuits if filed in similiar circumstances." (11 CFR 114.10).

You are hereby advised that under Georgia law you, as Chairman and Treasurer, respectively, of the Hanson Carter For Congress Campaign Committee, who authorized or subsequently ratified the transaction or obligation incurred by or on behalf of the committee, are individually jointly and severally liable as principals thereon. Accordingly, demand is herewith made that you immediately pay Klein-Sieb Advertising, Inc. the sum of \$17,869.54.

This letter shall also serve as notice that Klein-Sieb Advertising, Inc. shall exercise all of its rights and remedies under Georgia law against all parties liable for the aforesaid obligation if Klein-Sieb Advertising, Inc. has not received payment in full or if an acceptable repayment program is not initiated within ten (10) days from the receipt of this letter.

EXHIBIT "C"

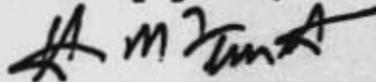
Honorable Hanson R. Carter
Mr. Perry A. Harris, Jr.
April 7, 1981
Page Two

Payment should be made directly to this office. All inquiries concerning this matter should be directed to the undersigned.

A copy of this letter is being sent to each of you by regular mail. Refusal of delivery or failure to accept delivery is deemed, under the law, to be the equivalent of notice.

Govern yourself accordingly.

Sincerely yours,



HENRY M. FEINSTEIN

HMF/vj

cc: Honorable Hanson R. Carter (by regular mail)
Mr. Perry A. Harris, Jr. (by regular mail)
Mr. Edward H. Sieb

No. 046562

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL
(See Reverse)

SENT TO		Hon. Hanson R. Carter		
STREET AND NO.		P. O. Box 645		
P.O. STATE AND ZIP CODE		Nashville, GA 31639		
POSTAGE		\$		
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE	\$		
	SPECIAL DELIVERY	\$		
	RESTRICTED DELIVERY	\$		
	OPTIONAL SERVICES	RETURN RECEIPT SERVICE	\$	
		SHOW TO WHOM AND DATE DELIVERED	\$	
		SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	\$	
		SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	\$	
SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	\$			
TOTAL POSTAGE AND FEES		\$		
POSTMARK OR DATE				

PS Form 3800, Apr. 1976

No. 046563

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL
(See Reverse)

SENT TO		Perry A. Harris, Jr.		
STREET AND NO.		c/o Citizens Bank		
P.O. STATE AND ZIP CODE		Nashville, GA 31639		
POSTAGE		\$		
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE	\$		
	SPECIAL DELIVERY	\$		
	RESTRICTED DELIVERY	\$		
	OPTIONAL SERVICES	RETURN RECEIPT SERVICE	\$	
		SHOW TO WHOM AND DATE DELIVERED	\$	
		SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	\$	
		SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	\$	
SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	\$			
TOTAL POSTAGE AND FEES		\$		
POSTMARK OR DATE				

PS Form 3800, Apr. 1976

PS Form 3811, Aug. 1978

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:
 Perry A. Harris, Jr.
 c/o Citizens Bank
 Nashville, GA 31639

3. ARTICLE DESCRIPTION:
 REGISTERED NO. 046563 CERTIFIED NO. INSURED NO.

4. I have received the article described above.
 SIGNATURE: *[Signature]* ADDRESS: Addressee Agent
 DATE OF DELIVERY: 4-29-81 POSTMARK: NASHVILLE, GA
 5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: *[Handwritten]* CLIENT'S INITIALS: *[Handwritten]*

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL.

PS Form 3811, Aug. 1978

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:
 Hon. Hanson R. Carter
 P. O. box 645
 Nashville, GA 31639

3. ARTICLE DESCRIPTION:
 REGISTERED NO. 046562 CERTIFIED NO. INSURED NO.

4. I have received the article described above.
 SIGNATURE: *[Signature]* ADDRESS: Addressee Authorized agent
 DATE OF DELIVERY: 4-5-81 POSTMARK: NASHVILLE, GA
 5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: *[Handwritten]* CLIENT'S INITIALS: *[Handwritten]*

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL.

EXHIBIT "C"

IN THE SUPERIOR COURT FOR THE COUNTY
OF BERRIEN, STATE OF GEORGIA

KLEIN-SIEB ADVERTISING, INC.,
Plaintiff,

VS.

HANSON R. CARTER and PERRY A.
HARRIS, JR.,
Defendants.

§
§
§
§
§
§
§

CIVIL ACTION NO. _____

COMPLAINT

1.

The defendants are residents of Berrien County, Georgia, and subject to the jurisdiction of this court.

2.

The defendants are jointly and severally liable to the plaintiff for \$17,869.54 for advertising services provided at their direction on behalf of the Hanson R. Carter Campaign for Congress, as shown upon the statements hereto attached as "Exhibit A".

3.

The defendants have failed and refused to pay for the services herein sued upon.

WHEREFORE, the plaintiff demands judgment against the defendants for \$17,869.54 plus interest and all costs of this action.

BOB REINHARDT
Reinhardt, Whitley & Rogers, P. C.
P. O. Drawer 1287
Tifton, Georgia 31793

attorneys for plaintiff

REINHARDT, WHITLEY
& ROGERS, P.C.
ATTORNEYS AT LAW
P. O. DRAWER 1287
TIFTON, GEORGIA 31793

EXHIBIT "D"

Klein-Sleb Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE July 22, 1980

INVOICE NO

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

08
NUMBER

TERMS NET 10 DAYS

STATEMENT OF ACCOUNT

Invoice #826-80
Invoice #837-80
Invoice #838-80
Invoice #839-80
Invoice #840-80
Invoice #841-80
Invoice #842-80
Invoice #877-80
Invoice #878-80
Invoice #885-80
Invoice #889-80
Invoice #899-80

\$ 3275.02
478.67
897.17
987.01
432.05
572.65
816.17
1480.00
2580.86
4656.82
385.88
1307.24

Total Balance

\$17,869.11

EXHIBIT A

EXHIBIT "D"

Klein-Siebert Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



Hanson Carter for Congress Campaign Committee
 Box 711
 Nashville, GA 31639

DATE May 23, 1980

INVOICE NO 826-80

JOB NUMBER

TERMS NET 10 DAYS

2012	<p><u>Campaign Brochure</u></p> <p>Layout and Design, Mechanical Pasteup, Typography, Negatives, Printing (10,000)</p>	\$1,727.53	
2017	<p><u>Campaign Mailing</u></p> <p>Mechanical Pasteup, Typography and Stats, Printing and folding 1,650 letters, Printing 10,000 envelopes, Postage, 1650 pieces @ \$.28 each.</p> <p>500 9" Balloons - Green and White</p> <p>"Hanson Carter for Congress"</p> <p><u>Photos</u></p> <p>17 4 x 5 color reprints, 8 proof sheets, 17 8 x 10 prints sent UPS, 44 3 1/2 x 5 color prints, 7 8 x 10 black and white prints, 2 1/2 hours photography</p> <p><u>Southern National</u></p> <p>30 Sheet Posters (Outdoor)</p> <p><u>Medical Association of Georgia</u></p> <p><u>Labels</u></p> <p><u>Dependable Courier Services</u></p> <p>Delivery Charges</p>	<p>\$ 953.64</p> <p>119.88</p> <p>\$ 267.75</p> <p>54.08</p> <p>77.59</p> <p>74.55</p>	
	Total Invoice		\$3,275.02

EXHIBIT "D"

Klein-Sieb Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE June 6, 1980

INVOICE NO. 837-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS NET 10 DAYS

275 Mini Billboards
 Mechanical Paste Up & Typography

\$ 430.00
 48.67

Total Invoice

\$ 478.67

Kleir Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE June 6, 1980

INVOICE NO 838-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Ga. 31639

JOB
 NUMBER

TERMS NET 10 DAYS

1958	5,000 2/color Letterheads 5,000 Matching Envelopes Layout, Mechanical Paste Up, Typography - for letterheads & envelopes	\$ 525.00 266.00 106.17	
	<p style="text-align: right;">Total Invoice</p>		\$ 897.17

EXHIBIT "D"

Klein-Sir Advertising, Inc.
1459 Peachtree Street, N.E.
Atlanta, Georgia 30309
Suite 315
(404) 892-8946



DATE June 6, 1980

INVOICE NO. 839-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS NET 10 DAYS

1960	5,000 Bumper Stickers (includes Layout, Design, Typography)	\$ 987.01		
Total Invoice			\$ 987.01	

Klein Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE June 6, 1980
 INVOICE NO. 840-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS NET 10 DAYS

1949	10,000 Hand-Out Cards (includes Paste-Up & Typography)	\$ 246.26	
1824	5,000 Contribution Cards (includes Paste-Up & Typography)	\$ 185.79	
	Total Invoice		\$ 432.05

EXHIBIT "D"

Klein-Siel Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE June 6, 1980

INVOICE NO. 841-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS NET 10 DAYS

2131	Three Signs for Valdosta Office 40"x60" 40"x120" 40"x140"	\$ 296.65	
1976	One 3'x12' Banner for Nashville Office	\$ 180.00	
203	Two 22"x8' Banners for Fire Truck	\$ 96.00	
	Total Invoice		\$ 572.65

EXHIBIT "D"

Klein-Siebert Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia, 30309
 Suite 315
 (404) 892-8946



DATE June 6, 1980

INVOICE NO. 842-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS NET 10 DAYS

<u>Miscellaneous</u>			
2003	Four - Congressional Badges	\$	18.67
1960	17 - Skimmers for Grand Opening		30.05
1963	36 - T-Shirts with special design		294.01
	Press Release - Folding, Mailing, Postage		62.60
1962	Three Enlargements of Congressional District Maps - Dry Mounting		180.00
	UPS Delivery Cost		15.20
	Misc. Delivery Service, Shipping Charges		61.00
	Five - 8x10 B&W Prints		154.64
	25 - 4x5 B&W Prints		
	One - Internegative		
Total Invoice		\$	816.17

EXHIBIT "D"

Klein-Sieh Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE July 22, 1980

INVOICE NO 877-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS NET 10 DAYS

<u>Media:</u>		
<u>WCTV</u> 8 spots/week - w/o 7/14-7/18/80 and w/o 7/21-7/25/80	\$ 440.00	
<u>WALB TV</u> 7 :30 spots w/o 7/14-7/18/80 and w/o 7/21-7/25/80	\$ 1040.00	
Total Invoice		\$1,480.00

EXHIBIT "D"

Klein Advertising, Inc.
 1459 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Suite 315
 (404) 892-8946



DATE July 22, 1980

INVOICE NO. 878-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS NET 10 DAYS

2129 2155	<u>Southern National</u> Paper for Outdoor Boards <u>Campaign Letters</u> Printing - 8,000 letters	\$ 2140.17 \$ 440.69	
Total Invoice			\$2,580.86

Atlanta, Georgia 30303
 Suite 315
 (404) 892-8946



DATE July 24, 1980

INVOICE NO 885-80

Hanson Carter for Congress
 Campaign Committee
 Box 711
 Nashville, Georgia 31639

JOB
 NUMBER

TERMS NET 10 DAYS

<u>Media:</u>			
<u>WALB TV - (Weeks of July 28, August 4)</u>			
1 spot, 6:30 a.m.-7:00 a.m. July 28,30,			
August 1,4			
1 spot, 7:00 a.m. - 9:00 a.m., July 29,31			
August 4			
1 spot, 12:00 noon - 1:00 p.m., July 28,30,			
August 1,4			
1 spot, 6:00 p.m. - 6:30 p.m., July 29,31,			
August 4			
1 spot, 11:30 p.m. to C.C., July 28,29,30,31,			
August 1,4			
1 spot, 9:00 p.m. - 11:00 p.m., August 4			
1 spot, 11:00 p.m. - 11:30 p.m., August 3			
1 spot, 7:30 p.m., July 28,30,31			
1 spot, 9:00 p.m., August 1			
1 spot, 7:00 p.m. - 8:00 p.m., August 2			
1 spot, 8:00 p.m., August 3			
Total 28 spots		\$ 3212.70	
<u>WCTV - (Weeks of July 28, August 4)</u>			
1 spot, 6:00 am - 7:00 am, July 28,30,			
August 1			
1 spot, 7:00am - 8:00 am, July 29,31			
1 spot, afternoon rotation, July 28, 30,			
August 1			
1 spot, 7:00pm - 8:00pm, July 29,31			
1 spot, 11:00pm to C.C., July 28,29,30,31,			
August 1			
1 spot, 8:00pm - 11:00pm, August 3			
Total 16 spots		\$ 974.12	
Production - WALB-TV		\$ 470.00	
Total Invoice		\$ 4,656.82	

Suite 315
104) 892-8946



DATE July 28, 1980

INVOICE NO. 889-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS NET 10 DAYS

MCTV - (Week of July 29 - August 1)
 1 spot, 7-8pm July 19
 2 spots, 11:30pm - CC, July 19
 1 spot, 6-7am, July 30
 2 spots, 7-8am, July 30
 3 spots, 7-8pm, July 30
 4 spots, 9-11pm, July 30
 1 spot, 11:30pm - CC, July 30
 4 spots, 6-7am, July 31
 3 spots, 12:30-4:30pm, July 31
 2 spots, 9-10pm, July 31
 3 spots, 11:30 - CC, July 31
 3 spots, 6-7am - August 1
 4 spots, 7-8am, August 1
 1 spot, 12:30-4:30pm, August 1

\$ 385.88

Total Invoice

\$ 385.88

Suite 315
404) 892-8946



DATE July 31, 1980

INVOICE NO 899-80

Hanson Carter for Congress
Campaign Committee
Box 711
Nashville, Georgia 31639

JOB
NUMBER

TERMS NET 10 DAYS

Media:

Radio Buy 7/31-8/4/80 - 20 spots on
each station

WALG - Albany	\$ 141.18
WMES - Ashburn	45.88
WAZA - Bainbridge	35.29
WMGR - Bainbridge	48.47
WBBK - Blakley	110.00
WGRA - Cairo	58.82
WCLB - Camilla	29.41
WCUG - Cuthbert	70.59
WDWD - Dawson	70.59
WMGA - Moultrie	31.76
WMJM - Cordele	34.70
WMTM - Moultrie	41.17
WRSG - Sylvester	29.40
WLOR - Thomasville	60.00
WPAX - Thomasville	45.88
WCUP - Tifton	49.41
WTIF - Tifton	47.06
NWGS - Tifton	49.41
WGAF - Valdosta	47.06
WGOV - Valdosta	47.06
WJEM - Valdosta	88.23
WFLD - Valdosta	64.70
WQDE - Albany	61.17

Total Invoice

\$1307.24

IN THE SUPERIOR COURT OF BERRIEN COUNTY
STATE OF GEORGIA

KLEIN-SIEB ADVERTISING, INC.,	§	
Plaintiff	§	CIVIL ACTION FILE NO. _____
vs.	§	
HANSON R. CARTER and PERRY A. HARRIS, JR.,	§	ANSWER, DEFENSES AND COUNTERCLAIM
Defendants	§	

I.

FIRST DEFENSE

The complaint fails to state a claim upon which relief can be granted as to these defendants.

II.

SECOND DEFENSE
(RESPONSIVE ANSWERS)

1.

The defendants admit paragraph 1 of plaintiff's complaint.

2.

The defendants deny paragraph 2 of plaintiff's complaint.

3.

The defendants deny paragraph 3 of plaintiff's complaint.

COUNTERCLAIM

1.

The plaintiff is subject to the jurisdiction of this court.

2.

The plaintiff contracted for billboard space and other unauthorized expenditures in the amount \$17,500.00.

3.

Defendants have paid the plaintiff for these unauthorized expenditures, and these expenditures should be offset against the amount sued for by the plaintiff.

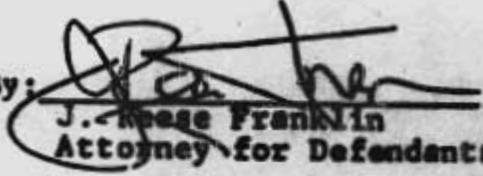
4.

The plaintiffs have failed and refused to render these monies back to the defendants.

WHEREFORE the defendants demand judgment against the plaintiff,
plus interest and all court costs of this action in the amount of
\$17,500.00.

PERRY, FRANKLIN & MOORE, P. C.

By:


J. Nease Franklin
Attorney for Defendants

P. O. Box 647
Nashville, Georgia 31639

EXHIBIT "E"

Certificate of Service

The undersigned attorney for _____
Defendants

hereby certifies that he has this day served a copy of the fore-
going **ANSWER, DEFENSES AND COUNTERCLAIM**

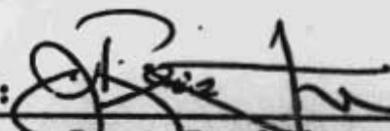
_____ upon counsel of record for
Plaintiff

by mailing a copy of same to them, properly addressed and with
sufficient postage to:

Mr. Bob Reinhardt
Reinhardt, Whitley & Rogers, P. C.
P. O. Drawer 1287
Tifton, Georgia 31793

Dated: September 10, _____, 1981 .

PERRY, FRANKLIN, & MOORE, P. C.

By: 

J. Reese Franklin
Attorney for Defendants

P. O. Box 647
Nashville, Georgia 31639
(912) 686-5591

● 8 2 0 4 0 3 2 1 ● 4 6

Certificate of Service

The undersigned attorney for _____

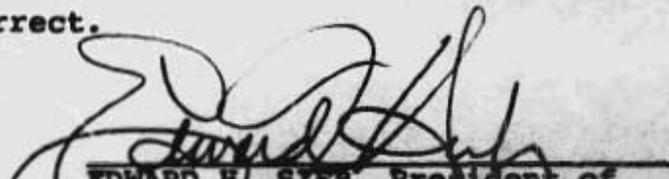
Defendants

hereby certifies that he has this day served a copy of the fore-

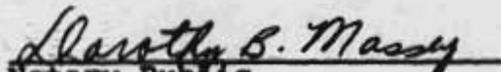
FEDERAL ELECTION COMMISSION

IN RE: The matter of Hanson R. Carter,
Perry A. Harris, Jr., and the
Hanson Carter for Congress
Campaign Committee (PEC Identifi-
cation No. 089176

Personally appeared before the undersigned attesting officer, duly authorized by law to administer oaths, comes EDWARD H. SIEB, President of KLEIN-SIEB ADVERTISING, INC., who, having first been duly sworn, deposed and said that he is authorized to make this affidavit on behalf of Klein-Sieb Advertising, Inc. and that the facts set forth in the within Complaint are true and correct.


EDWARD H. SIEB, President of
KLEIN-SIEB ADVERTISING, INC.

Sworn to and subscribed
before me this 3rd day
of February, 1982.


Notary Public

My Commission Expires: _____
[AFFIX NOTARIAL SEAL] Notary Public, Georgia, State at Large
My Commission Expires April 29, 1983

82040321688



HENRY M. FEINSTEIN

SUITE 950 PHARR CENTER
550 PHARR ROAD, N.E.
ATLANTA, GEORGIA 30305

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

CERTIFIED MAIL NO. 046605
RETURN RECEIPT REQUESTED



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20541

THIS IS THE BEGINNING OF MUR # 1427

Date Filmed 5/13/82 Camera No. --- 2

Cameraman JSC