



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

2/13/87

THE FOLLOWING MATERIAL IS BEING ADDED TO THE
PUBLIC FILE OF CLOSED MUR 1542.

97040542174

plm



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 29, 1986

Robert N. Levin, Esquire
Silver, Freedman & Taff
1735 Eye Street, N.W.
Washington, D.C. 20036

RE: MUR 1542
John L. Whitehead
John Whitehead and Associates

Dear Mr. Levin:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within 10 days.

Should you have any questions, contact Jonathan Levin, the attorney assigned to this matter at (202) 376-5690.

Sincerely,

Charles N. Steele
General Counsel

A handwritten signature in cursive script, appearing to read "Lois G. Lerner".

By: Lois G. Lerner
Associate General Counsel

371104-173

plm



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 29, 1986

Linda L. Fisher, President
Preferred Lists, Inc.
499 South Capitol Street, S.W.
Suite 504
Washington, D.C. 20003

RE: MUR 1542
Preferred Lists, Inc.

Dear Ms. Fisher:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within 10 days.

Should you have any questions, contact Jonathan Levin, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Charles N. Steele
General Counsel

A handwritten signature in cursive script, appearing to read "Lois G. Lerner".

By: Lois G. Lerner
Associate General Counsel

9771104 173

plm



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 29, 1986

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

RE: MUR 1542
Republican National Committee

Dear Mr. Braden:

This is to advise you that the entire file in this matter has now been closed and will be a part of the public record within thirty days. Should you wish to submit any legal or factual materials to be placed in the public record in connection with this matter, please do so within 10 days.

Should you have any questions, contact Jonathan Levin, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Charles V. Steele
General Counsel

A handwritten signature in cursive script, appearing to read "Lois G. Lerner".

By: Lois G. Lerner
Associate General Counsel

1711064 171

plm



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 29, 1986

Carson Y. Nolan, Ph.D.
President
American Printing House for the Blind, Inc.
P.O. Box 6085
Louisville, Kentucky 40206

RE: MUR 1542
American Printing House for
the Blind

Dear Dr. Nolan:

This is to advise you that the entire file in this matter, formerly captioned as MUR 1541, has now been closed and will become part of the public record within thirty days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within 10 days.

Should you have any questions, contact Jonathan Levin, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Charles N. Steele
General Counsel

By: Lois G. Lerner
Associate General Counsel

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plm



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

December 29, 1986

Matthew S. Watson, Esquire
1914 Sunderland Place, N.W.
Washington, D.C. 20036

RE: MUR 1542
Victor K. Heyman
Heyman Consulting Group, Inc.

Dear Mr. Watson:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within 10 days.

Should you have any questions, contact Jonathan Levin, the attorney assigned to this matter, at (202) 276-5690.

Sincerely,

Charles N. Steele
General Counsel

A handwritten signature in cursive script, appearing to read "Lois G. Lerner".

By: Lois G. Lerner
Associate General Counsel

37110042179

Plum



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

December 29, 1986

Robert R. Sparks, Jr., Esquire
Herge, Sparks, Christopher & Biondi
8201 Greensboro Drive
Suite 200
McLean, VA 22102

RE: MUR 1542

Dear Mr. Sparks:

This is in reference to the complaints you filed with the Commission on April 4, 1983, concerning alleged violations of 2 U.S.C. §438(a)(4) and 11 C.F.R. § 104.15.

The entire file in this matter has been closed. After conducting an investigation, the Commission made a number of determinations in this matter. In addition, conciliation agreements have been signed by a number of the respondents in this matter. Copies of these agreements and General Counsel's Reports pertaining to other determinations in this matter are enclosed.

Sincerely,

Charles N. Steele
General Counsel

Lois G. Lerner
BY: Lois G. Lerner
Associate General Counsel

Enclosures
Conciliation Agreements
General Counsel's Reports



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 1542

DATE FILMED 3/14/88 CAMERA NO. 2

CAMERAMAN GRC

83040574708

RECEIVED BY THE FEC
204479
83 APR 4 P 3: 58
CCH# 9799

SEDAM & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

SUITE 1100

6300 GREENSBORO DRIVE

MCLEAN, VIRGINIA 22102

(703) 821-1000

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

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

SUITE 620
1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D. C. 20006
(703) 821-1000

TELEX: 710-831-0896

CABLE: SEDAMHERGE

March 30, 1983

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

Dear Mr. Steele:

This firm serves as general counsel to National Conservative Political Action Committee, 1500 Wilson Boulevard, Arlington, Virginia 22209 ("NCPAC"), on whose behalf this complaint is filed pursuant to 2 U.S.C. §437g, and the Commission's regulations thereunder. NCPAC is a multi-candidate political committee, registered with the Commission, as required by 2 U.S.C. §433. Its registration number is C00024687.

As required by 2 U.S.C. §434, NCPAC files with the Commission and appropriate Secretaries of State reports of its contributions and expenditures in connection with various federal elections, listing the names and addressess of its contributors, and the amounts of such contributions. NCPAC includes among those names pseudonyms, as permitted by 2 U.S.C. §438(a)(4), and has reported those names to the Commission.

Enclosed is a mailing soliciting funds on behalf of American Printing House for the Blind, which was addressed to one of the pseudonyms used by NCPAC only on its lists of contributors filed with the Commission and Secretaries of State in connection with federal elections. In order to maintain the confidentiality of NCPAC's pseudonym, the addressee's name and address have been masked on the enclosed mailing, but the code, "125," has been left visible so that a respondent can more easily identify the list used in the questioned mailing.

Investigation by NCPAC has revealed that a list containing the subject pseudonym was rented to American Printing House for the Blind by Working Names, Inc., 4421 A East-West Highway, Bethesda, Maryland 20014. Meyer T. Cohen, an officer of

98040574709

24:23

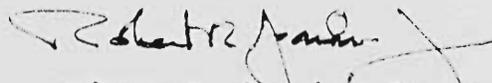
Mr. Charles N. Steele
Page Two
March 30, 1983

Working Names, has admitted to agents of NCPAC and to the undersigned that Working Names rented the foregoing list to American Publishing House. Mr. Cohen claims that he is only a broker for the list, but has refused to disclose the identities of the purported owners of the list, or to give any further information concerning its use, other than to admit that some of the names on the list came from filings with certain Secretaries of State.

With certain specific exceptions, the use by any person, for the purpose of soliciting contributions or for commercial purposes, of information taken from reports or statements filed with the Commission or with Secretaries of State is prohibited by 2 U.S.C. §438(a)(4) and 11 C.F.R. 104.15. From the foregoing, it appears that Working Names, Inc., through Meyer T. Cohen, and certain unknown "owners" of the list used by American Publishing House may have violated and may be continuing to violate 2 U.S.C. §438(a)(4).

The Commission is requested to investigate this matter and to take such action as it considers appropriate, pursuant to 2 U.S.C. §437g. Please feel free to contact me if you have any questions or need additional information in this matter.

Sincerely,

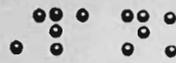


Robert R. Sparks, Jr.
Counsel for the National
Conservative Political
Action Committee

Subscribed and sworn to before me this 30th day of
March, 1983.

Carolyn M. Cecchini
Notary Public

88040674710



AMERICAN PRINTING HOUSE FOR THE BLIND
FUND FOR BRAILLE AND RECORDED EDITIONS **Reader's Digest®**
Post Office Box 6389, Louisville, Kentucky 40206
Telephone: 502-895-2405

Dear Friend:

A six-pound package is delivered monthly to an elderly gentleman in a retirement village.

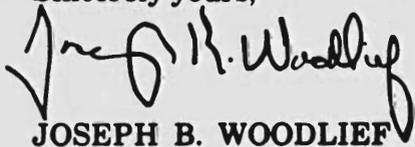
Upon its receipt, "The Old Pest" (as he calls himself) contacts us to announce the arrival of the latest issue of the braille Reader's Digest. The regularity of his announcement has made his name a familiar one, here at the American Printing House for the Blind; the gratitude he expresses reassures us of the value of our work.

And he is one of thousands throughout the country who eagerly await the monthly arrival of braille and recorded editions of Reader's Digest. "The Digest is the best medium I have for keeping abreast of the times," writes one deaf-blind reader. These words from an elderly woman in Idaho echo the sentiments expressed in many letters:

"When the mailman delivers my Reader's Digest, I feel like a rich woman, for I love to read, and I am content and happy, in my little room."

Your gift to the Fund for Braille and Recorded Editions-- Reader's Digest will continue to make this "invaluable" resource available to the blind and physically handicapped. Please send your check today; \$10.50 will bring a treasury of recorded literature into many a lone, little room; \$60.00 will deliver seventy-two pounds of braille entertainment to the beloved "Old Pest."

Your gift will be a source of light to those who live in darkness.

Sincerely yours,

JOSEPH B. WOODLIEF
Chairman of the Board

OP

574711

**BRaille ALPHABET AND NUMBERS
USED BY THE BLIND**

Close your eyes and read this with your fingers.

a	b	c	d	e	f	g
1	2	3	4	5	6	7
h	i	j	k	l	m	n
8	9	0				
o	p	q	r	s	t	u
v	w	x	y	z	,	.

Capital sign	Number sign	?
-----------------	----------------	---

The Braille System is comprised of signs formed by the use of all the possible combinations of 6 dots numbered and arranged thus:

1	4
2	5
3	6

Letters are capitalized by prefixing dot 6. The first ten letters preceded by the number sign represent numbers. Punctuation marks are formed in the lower part of the cell.

In addition to ordinary print the Braille System provides for the writing of foreign languages, musical scores, mathematical and chemical notations, and other technical matter.

T h i s i s

9 8 0 4 0 5 7 9 7 1 2



**American Printing
House for the Blind**

INCORPORATED



1839 FRANKFORT AVENUE
MAILING ADDRESS: P.O. Box 6085
LOUISVILLE, KENTUCKY 40206-0085

AMERICAN PRINTING HOUSE FOR THE BLIND
FUND FOR BRAILLE AND RECORDED EDITIONS **Reader's Digest®**
Post Office Box 6389, Louisville, Kentucky 40206



125

READER'S DIGEST is a registered trademark
of The Reader's Digest Association, Inc.

I ENCLOSE \$ _____ FOR THE FUND FOR BRAILLE & RECORDED EDITION-READER'S DIGEST® TO BE APPLIED AS FOLLOWS

- THE TALKING EDITION — \$10.50 \$ _____
- THE BRAILLE EDITION — \$80.00 \$ _____
- EXTENSION FUND (for additional facilities
and equipment for the American Printing
House for the Blind) \$ _____
- NO PREFERENCE \$ _____

All gifts are income tax deductible. Where donors express no preference, the gifts will be applied where most urgently needed. Receipts will be sent upon request.

Please return this card, noting any address change.

Make checks payable to American Printing House for the Blind

(over)

8 3 0 4 0 5 7 4 7 1 3

Upon request, gifts to the Fund for Braille and Recorded Editions
Reader's Digest® will be acknowledged as you direct:

In Memory of _____

In Honor of _____

In Celebration of _____

PLEASE NOTIFY: NAME _____

ADDRESS _____

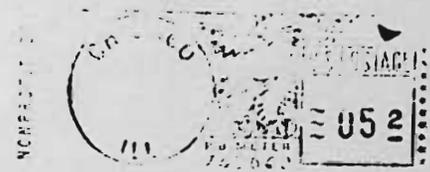
CITY _____

STATE & ZIP _____

3 3 0 4 0 5 / 9 7 1 4



P.O. Box 6389
Louisville, KY 40208



If you can't read this, we can help;
If you can, you can help us.



FUND FOR BRAILLE AND RECORDED EDITIONS **Reader's Digest**[®]

Post Office Box 6389.

Louisville, Kentucky 40206

SEDAM & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

SUITE 1100

8300 GREENSBORO DRIVE

MCLEAN, VIRGINIA 22102

(703) 821-1000

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

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

SUITE 620
1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D. C. 20006
(703) 821-1000

TELEX: 710-831-0896

CABLE: SEDAMHERGE

April 1, 1983

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

Dear Mr. Steele:

On March 30, 1983, I wrote to you on behalf of National Conservative Political Action Committee, 1500 Wilson Boulevard, Arlington, Virginia 22209 ("NCPAC"), for whom this firm serves as general counsel, concerning what appeared to be the wrongful use by others of names and addresses filed by NCPAC with the Commission and certain Secretaries of State, as required by law.

I enclose a copy of a mailing recently sent by the Republican National Committee to a pseudonym used by NCPAC in connection with the foregoing filings. The pseudonym is the same as the one to whom the mailing complained of in our March 30 letter was sent. I have contacted Preferred Lists, 499 South Capitol Street, S.W., Suite 504, Washington, D.C. 20003, the list broker from whom the Republican National Committee obtained the list used in connection with the enclosed mailing. Linda Fisher of Preferred Lists has told me that the questioned list was obtained from Working Names, Inc., 4421 A East West Highway, Bethesda, Maryland 20014, and is known as "Truly Conservative Contributors."

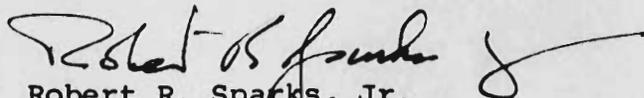
As was done in our March 30 letter to the Commission, the name of NCPAC's pseudonym has been deleted, but code "VF" has been left visible so that a respondent can more easily identify the list used in the questioned mailing.

R 3 0 4 0 5 7 4 7 1 6

Mr. Charles N. Steele
Page Two
April 1, 1983

The Commission is requested to consider the foregoing information and enclosed documents in connection with the March 30, 1983 complaint originally filed herein.

Sincerely,



Robert R. Sparks, Jr.
Counsel for the National
Conservative Political Action
Committee

Subscribed and sworn to before me this 1st day of
April, 1983.

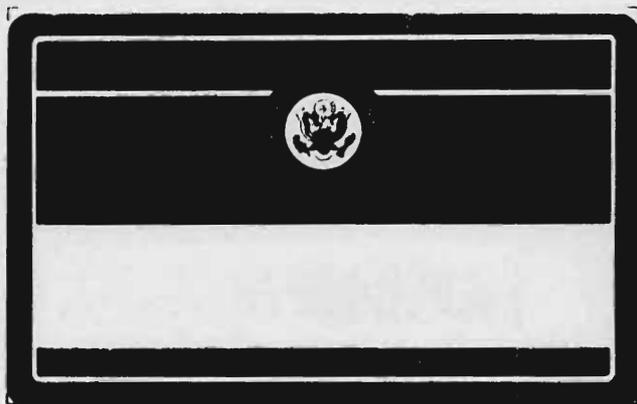

Notary Public

Enclosure

33040674717

1983 SUSTAINING MEMBERSHIP DRIVE

REPUBLICAN NATIONAL COMMITTEE



Please note: A contribution of \$25 or more will entitle you to receive the behind the scenes political news magazine, First Monday, published by the Republican National Committee.

Please make your check payable to: Republican National Committee

Dear President Reagan:

I accept your invitation to become a Sustaining Member for 1983. I realize the Committee must begin working now in order to win a Republican victory in 1984 that will guarantee the long-term success of your programs to rebuild our nation. Enclosed is my membership contribution in the amount of:

\$15 \$25 \$50 \$100 \$250 \$500 \$_____ other

VF

Please remove your 1983 Membership Card, then return this portion of the form in the enclosed reply envelope with your check. No postage needed. See other side.



RONALD REAGAN

Monday morning

Dear Friend:

When I took office as your President, our country faced the worst economic crisis since the days of Franklin Roosevelt.

With your support, we enacted far-reaching legislation designed to attack the root cause of our economic problems.

We cut back on the Democrats' high tax and big spending binge. And we passed a long-range economic program to reduce inflation, bring down interest rates and create productive jobs in private industry.

Today, I'm proud to say our nation is headed in a new direction. But I felt it was important I personally write you now because what you and I do in the coming days will determine how successful we are in keeping the nation on this new course.

If we fail to stop the Democrats from winning in 1984 they could overturn and destroy all the progress we have made in pulling our nation back from the brink of economic catastrophe.

That's why I hope you will accept my invitation to join me in laying the groundwork for a Republican victory in 1984.

The simple truth is that our opponents, the Democrats, have not learned the lesson that their policies of tax and tax, spend and spend were directly responsible for the prolonged recession which caused all Americans, young and old, worker and businessman alike, to fear for their very economic survival.

And if the Democrats and their liberal special interest group allies regain power, then I am convinced they will force our nation right back down the disastrous road to more spending and higher income taxes.

I am not prepared to sit back and let the Democrats destroy what we have done to cut taxes, to achieve a spectacular reduction in inflation and to restore basic individual American freedoms.

And I don't believe you are, either.

Right now the most important thing you can do to help me carry out our programs that are redirecting our nation is to accept the special Republican Party Membership Card that has been enclosed for you at my request.

By accepting and validating your card with your signature, you are signaling your personal commitment to work with me in our fight for the

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principles we share. After you sign your card, I urge you to stand behind your commitment by making a generous contribution to the Republican National Committee.

Let me tell you why your support of this particular Committee is so important to me.

The National Committee is the official organization of our Party responsible for laying the foundation for our entire 1984 campaign effort to elect more Republicans to federal, state and local office.

I am counting on your support so the Committee can carry out its full campaign program for our candidates.

This includes recruiting and training outstanding candidates, conducting independent surveys of voter attitudes, running local and national TV and radio campaigns, and organizing thousands of volunteers.

That's the only way our candidates will be able to counter the massive liberal/Democratic drive to take back control of the government in 1984.

I say that because, just as in 1982, our candidates in 1984 will be opposed by a powerful, well-financed coalition of liberal special interest groups and Big Labor Unions.

As was demonstrated in the last election, this liberal coalition will stop at nothing to defeat our candidates.

They'll spend millions to run radio and TV ads that deliberately twist and distort our programs. And they'll unleash Big Labor's so-called "voluntary" manpower.

There is another equally important reason why I am hoping you will make a generous contribution to the Committee.

In the months ahead, I personally will be relying heavily on the Committee to build and mobilize broad national support for my legislative programs.

Over the last two years the Committee's efforts on behalf of my economic proposals have been absolutely vital to their passage through Congress.

And as I continue to press for dramatic changes that will bring government spending under control, I will be relying on the Committee to again help me win some very difficult political battles in Congress.

You see, as I look to the months ahead, there is still so much for you and me to do together for our country.

We must once and for all bring government spending under control. We must give back to state governments the powers the federal government and courts were never intended to have. And we must continue to rebuild our defenses so we can negotiate arms reductions with the Soviets from a position of strength.

But if the Democrats win in 1984, elect a liberal President, gain control of the Senate, and increase their strength in the House, we may lose forever

the chance to finish the work we have begun.

We would see an immediate return of the very same policies that caused the highest interest and inflation rates in peacetime history and allowed the Soviets to achieve military superiority over us.

You and I simply cannot afford to let this happen.

I know from talking with my good friend Mike Curb, National Finance Chairman, that the number one goal of the Committee is to raise its full \$15.8 million budget for 1983.

This amount represents the absolute minimum the Committee needs to protect incumbent Republicans, help our challenger candidates and turn back the alliance of liberal special interest groups, Big Labor Unions and the Democratic Party that has dictated our nation's policies for the last thirty years.

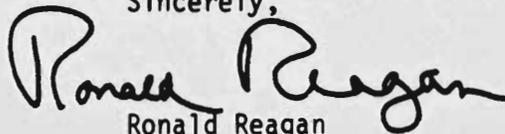
If the Committee cannot raise its full budget I fear it will be a dangerous setback in our long struggle to discard the bankrupt liberal policies of the past and keep America on our new course towards economic prosperity.

That's why I am hoping you will make a generous contribution to the Committee today. No matter how much you decide to send, I know it will be a great help.

Since taking office I have worked hard to live up to the faith which you have placed in me. And I will continue to do so in the years ahead.

But I am counting on you to stand by me, our Party and its principles to make the vision we share of America's future a reality. Knowing I have your support will be a very special source of strength for me.

Sincerely,



Ronald Reagan

RR/cf

3 8 0 4 0 6 7 4 7 2 1

8 3 0 4 0 6 7 4 7 2 2



NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES



BUSINESS REPLY MAIL
FIRST CLASS PERMIT NO. 10169 WASHINGTON, D.C.

POSTAGE WILL BE PAID BY ADDRESSEE



1983 SUSTAINING MEMBERSHIP DRIVE
Republican National Committee
310 First Street, S.E.
P.O. Box 1900
Washington, D.C. 20013



REPUBLICAN NATIONAL COMMITTEE
310 First Street, SE Washington, D.C. 20003

Non-Profit Org
U.S. Postage
PAID
Republican
National Committee

11

DO NOT FOLD OR
BEND THIS ENVELOPE

Acc# 9837

SEDAM & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

SUITE 1100

8300 GREENSBORO DRIVE

MCLEAN, VIRGINIA 22102

(703) 821-1000

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

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

SUITE 620
1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(703) 821-1000

TELEX: 710-8340888

CABLE: SEDAMHERGE

April 7, 1983

2
1
3
8

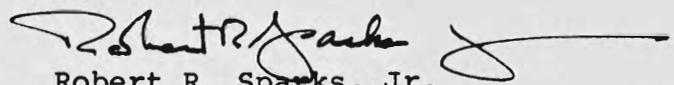
Mr. Charles N. Steele
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. Steele:

In connection with my letter to you, dated March 30, 1983, concerning the apparent misuse by Working Names, Inc. of certain lists of contributors to National Conservative Political Action Committee, this will confirm my telephone conversation with Mr. Levin of your office, by which I informed him that at page 2 of that letter "American Publishing House" is erroneously identified as a user of the list in question. Line 3, page 2 of my March 30 letter should identify "American Printing House for the Blind" as the user of the questioned list.

Please feel free to call me if you have any questions on this matter.

Sincerely,


Robert R. Sparks, Jr.

38040574723



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 8, 1983

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

Dear Mr. Sparks:

This letter is to acknowledge receipt of your complaint which we received on April 4, 1983, against Working Names, Inc., Preferred Lists and the Republican National 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 five days.

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. We suggest that this information be sworn to in the same manner as your original complaint. For your information, we have attached a brief description of the Commission's procedure for handling complaints. If you have any questions, please contact Steven Barndollar at (202) 523-4073.

Sincerely,

Charles N. Steele
General Counsel

A handwritten signature in cursive script, appearing to read "Kenneth A. Gross".

By Kenneth A. Gross
Associate General Counsel

Enclosure

8 8 0 4 0 6 7 4 7 2 4



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 8, 1983

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

Dear Mr. Sparks:

This letter is to acknowledge receipt of your complaint which we received on April 4, 1983, against Working Names, Inc. and American Printing House for the Blind 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 five days.

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. We suggest that this information be sworn to in the same manner as your original complaint. For your information, we have attached a brief description of the Commission's procedure for handling complaints. If you have any questions, please contact Steven Barndollar at (202) 523-4073.

Sincerely,

Charles N. Steele
General Counsel

A handwritten signature in cursive script, appearing to read "Kenneth A. Gross", is written over the typed name of the Associate General Counsel.

By Kenneth A. Gross
Associate General Counsel

Enclosure

83040674725



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 8, 1983

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

American Printing House for the Blind
P.O. Box 6389
Louisville, Kentucky 40206

Re: MUR 1541

Dear Sir/Madam:

This letter is to notify you that on April 4, 1983, the Federal Election Commission received a complaint which alleges that your organization may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1541. 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 organization 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.

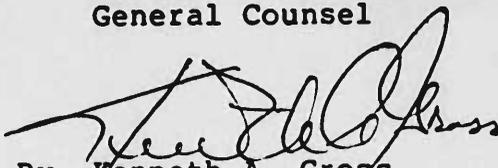
If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

88040574726

If you have any questions, please contact Jonathan Levin, the staff member assigned to this matter at (202) 523-4529. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel


By Kenneth A. Gross
Associate General Counsel

8 8 0 4 0 5 7 4 7 2 7

Enclosures

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

PS Form 3811, Dec. 1980

1541 8/6

● **SENDER:** Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

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

2. **RESTRICTED DELIVERY**
 (The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$ _____

3. **ARTICLE ADDRESSED TO:**
 American Hunting House/Blind
 Louisville, KY

4. **TYPE OF SERVICE:** **ARTICLE NUMBER**
 REGISTERED INSURED
 CERTIFIED COD
 EXPRESS MAIL

943081

(Always obtain signature of addressee or agent)

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

5. **DATE OF DELIVERY** **POSTMARK**

6. **ADDRESSEE'S ADDRESS (Only if different from return address)**

7. **UNABLE TO DELIVER BECAUSE:** **EMPLOYEE'S INITIALS**

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 8, 1983

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Meyer T. Cohen
Working Names, Inc.
4421A East West Highway
Bethesda, Maryland 20014

Re: MUR 1541

Dear Mr. Cohen:

This letter is to notify you that on April 4, 1983, the Federal Election Commission received a complaint which alleges that your company may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1541. 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 company 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.

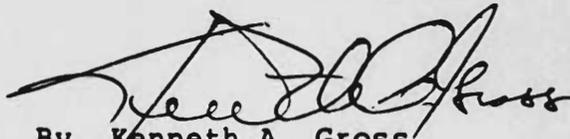
If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

88040574728

If you have any questions, please contact Jonathan Levin, the staff member assigned to this matter at (202) 523-4529. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel


By Kenneth A. Gross
Associate General Counsel

9 8 0 4 0 5 1 4 7 2 9

Enclosures

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

1541 4/6

5 Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

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

2. RESTRICTED DELIVERY
 (The restricted delivery fee is charged in addition to the return receipt fee.)
 TOTAL \$ _____

3. ARTICLE ADDRESSED TO:
 Working Homes -
 Bethesda, MD

4. TYPE OF SERVICE: ARTICLE NUMBER
 REGISTERED INSURED
 CERTIFIED COD 943080
 EXPRESS MAIL

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE Addressee Authorized agent
 [Signature]

5. DATE OF DELIVERY APR 26 1983
 [Postmark]

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE: 7a. EMPLOYEE'S INITIALS



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 8, 1983

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Republican National Committee
310 First Street, SE
Washington, D.C. 20003

Re: MUR 1542

Dear Sir/Madam:

This letter is to notify you that on April 4, 1983, 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"). A copy of the complaint is enclosed. We have numbered this matter MUR 1542. 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.

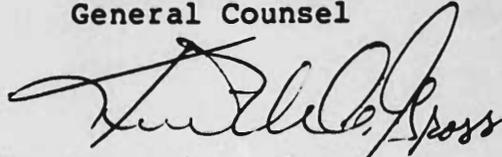
If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

88040674730

If you have any questions, please contact Jonathan Levin, the staff member assigned to this matter at (202) 523-4529. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



By Kenneth A. Gross
Associate General Counsel

8 8 0 4 0 5 / 4 7 3 1

Enclosures

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

542

PS Form 3811, Dec. 1980

● **SENDER:** Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

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

Show to whom and date delivered —¢

Show to whom, date, and address of delivery.. —¢

2. **RESTRICTED DELIVERY** —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$ _____

3. **ARTICLE ADDRESSED TO:**
RAC
Washington, D.C. 20003

4. **TYPE OF SERVICE:** **ARTICLE NUMBER**

REGISTERED INSURED

CERTIFIED COD

EXPRESS MAIL

943077

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

[Signature]

5. **DATE OF DELIVERY** **POSTMARK**

6. **ADDRESSEE'S ADDRESS** (Only if requested)

7. **UNABLE TO DELIVER BECAUSE:** 7a. **EMPLOYEE'S INITIALS**

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 8, 1983

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Meyer T. Cohen
Working Names, Inc.
4421A East West Highway
Bethesda, Maryland 20014

Re: MUR 1542

Dear Mr. Cohen:

This letter is to notify you that on April 4, 1983, the Federal Election Commission received a complaint which alleges that your company may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1542. 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 company in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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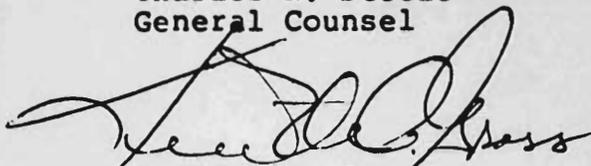
If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

R 3 0 4 0 5 7 4 7 3 2

If you have any questions, please contact Jonathan Levin, the staff member assigned to this matter at (202) 523-4529. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



By Kenneth A. Gross
Associate General Counsel

9 8 0 4 0 5 7 4 7 3 3

Enclosures

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

PS Form 3811, Dec. 1980

1542 4/5

● SENDER: Complete Items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

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

Show to whom and date delivered \$

Show to whom, date, and address of delivery..... \$

2. RESTRICTED DELIVERY (The restricted delivery fee is charged in addition to the return receipt fee.) \$

TOTAL..... \$

3. ARTICLE ADDRESSED TO:
Working Homes
Bethesda, MD

4. TYPE OF SERVICE: ARTICLE NUMBER

REGISTERED INSURED

CERTIFIED COD 943078

EXPRESS MAIL

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

[Signature]

5. DATE OF DELIVERY 4/12/83

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

POSTMARK: BETHESDA, MD APR 12 1983



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 8, 1983

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Preferred Lists
499 South Capitol Street, SW
Suite 504
Washington, D.C. 20003

Re: MUR 1542

Dear Sir/Madam:

This letter is to notify you that on April 4, 1983, the Federal Election Commission received a complaint which alleges that your organization may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1542. 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 organization in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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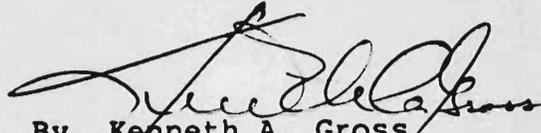
If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

93040674734

If you have any questions, please contact Jonathan Levin, the staff member assigned to this matter at (202) 523-4529. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



By Kenneth A. Gross
Associate General Counsel

83040674735

Enclosures

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

PS Form 3811, Dec. 1990

1542 4/6

● **SENDER: Complete items 1, 2, 3, and 4.**
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

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

Show to whom and date delivered —¢

Show to whom, date, and address of delivery.. —¢

2. **RESTRICTED DELIVERY**
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$ _____

3. **ARTICLE ADDRESSED TO:**
Preferred Lists
Wash. D.C. 20003

4. **TYPE OF SERVICE:** **ARTICLE NUMBER**

REGISTERED INSURED

CERTIFIED COD

EXPRESS MAIL

943079

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

C. Guérard

5. **DATE OF DELIVERY** **POSTMARK**

6. **ADDRESSEE'S ADDRESS (Only if requested)**

7. **UNABLE TO DELIVER BECAUSE:** **7a. EMPLOYEE'S INITIALS**

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

204601

6cc# 9856

WORKING NAMES, INC.

4421 A East-West Highway
Bethesda, Maryland 20014

301/656-5103



April 12, 1983

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

RE: MUR 1541

Dear Mr. Gross:

We spoke to Mr. J. Levin in regard to this complaint.

It appears that no substantiation or proof was submitted. We have requested of Mr. Levin, and previously of Mr. Sparks, that such substantiation be furnished.

Without this information, we deny all allegations and request that this matter be dropped.

Sincerely,

Meyer T. Cohen

MTC/kj

33040674736

11 APR 20 1983

204602 Bcc# 9857

WORKING NAMES, INC.

4421 A East-West Highway
Bethesda, Maryland 20014

301/656-5103



April 12, 1983

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

RE: MUR 1542

Dear Mr. Gross:

We spoke to Mr. J. Levin in regard to this complaint.

It appears that no substantiation or proof was submitted.
We have requested of Mr. Levin, and previously of Mr. Sparks,
that such substantiation be furnished.

Without this information, we deny all allegations and request
that this matter be dropped.

Sincerely,

Meyer T. Cohen

MTC/kj

83040574737

2041254
GCE# 4872

RECEIVED - THE CEO

03 APR 18 PZ: 29



18 P3:

April 14, 1983

**American
Printing House
For The Blind
Incorporated**

1839 Frankfort Avenue
Mailing Address:
P.O. Box 6085
Louisville, Ky. 40206-0085

502 895-2405
TWX 810 535-3449

Carson Y. Nolan, Ph.D.
President

Joseph B. Woodlief
Chairman of the Board

John W. Barr, III
Treasurer

Board of Trustees

John W. Barr, III
Watson B. Dabney
George N. Gill
Virginia T. Keeney, M.D.
Marion S. Webb, Jr.
James S. Welch
Joseph B. Woodlief

Members Ex Officio

Superintendents of
Public Institutions for
Education of Blind and
Chief Officers of State
Departments of
Education

Mr. Jonathan Levin
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Levin:

In reference to MUR 1541: on or about the 28th of December, 1982, the American Printing House for the Blind, Inc., arranged with CELCO, a list broker located at 381 Park Avenue South, New York, NY 10016, to rent 20,000 names from a list known to the American Printing House as "Truly Conservative" for direct mail fund-raising purposes. A copy of Purchase Order No. 83-0268 dated 1/5/83, reflecting this order as well as others, is attached.

The American Printing House for the Blind entered into the agreement with CELCO in good faith and without prior knowledge that any name received from the list known to the American Printing House as "Truly Conservative" was or might be tainted.

To the best of my knowledge, the American Printing House for the Blind has never done business with WORKING NAMES, INC., or MEYER T. COHEN.

Under the circumstances stated above, the American Printing House for the Blind denies any wrong-doing and/or willful violation of 2 U.S.C. § 438 (a) (4).

Sincerely,

CARSON Y. NOLAN
President

Subscribed and sworn to before me this 14 day of April, 1983.

Notary Public

MY COMMISSION EXPIRES JANUARY 14, 1987.

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PURCHASE ORDER

AMERICAN PRINTING HOUSE FOR THE BLIND, INC.

P.O. Box 6085 1839 FRANKFORT AVENUE
LOUISVILLE, KENTUCKY 40208
502/895-2405

SHOW P.O. NUMBER ON ALL
INVOICES, PACKAGES, SHIPPING
PAPERS AND CORRESPONDENCE

VENDOR Celco
Attn: Mrs. Carol Enters
381 Park Ave., S.- Room 919
New York, NY 10016

SHIP TO
SALES TAX EXEMPTION NO. D-13568

REQUESTED DELIVERY	CARRIER	F.O.B.	TERMS	P.O. DATE	PURCHASE ORDER NO.			
1-17-83				1-5-83	83-0268			
ITEM	QUANTITY	MFG. PART NO. AND DESCRIPTION			APH NO.	RECEIVED	U/M	PRICE
1	12,500	Helix #106 Contributors					M	45.00
2	12,500	Conservative Dornor Elites					M	55.00
3	12,500	Middle of the Road Zealots					M	50.00
		Non-returnable Mag Tape Charge						20.00
4	12,500	Key Milti Donors C3					M	55.00
5	30,000	Epaco Hotline Conservatives					M	65.00
6	20,000	Just Conservative					M	50.00
		Non-returnable Mag Tape Charge						20.00
7	20,000	Best Conservative Working Names 3CM7					M	55.00
		Non-returnable Mag Tape Charge						25.00
8	10,000	Charitable Concerned Contributors					M	60.00
9	10,000	Truly Conservative					M	50.00
		Non-returnable Mag Tape Charge						20.00
10	10,000	Donors to a Health Charity					M	55.00
		All on Mag Tape - 1600 bpi - OMIT: SCF 900-918 &						
		SCF 980-994.						
DELIVER TO: Master Mailers, Inc., Attn: Epstein/APH,								
419 S. Jefferson Street, Chicago, IL 60607								

INSTRUCTIONS TO VENDOR

1. SUBMIT INVOICE IN DUPLICATE.
2. ACKNOWLEDGE IMMEDIATELY WITH SHIPPING INFORMATION.
3. MAKE NO SUBSTITUTION UNLESS AUTHORIZED.

**AMERICAN PRINTING HOUSE FOR THE BLIND
INCORPORATED**

David R. Bash DAVID R. BASH
PURCHASING MANAGER

Jane T. Kent JANE T. KENT
PRESIDENT OR CONTROLLER



20 86

RECEIVED AT THE FEC
CCA 9981
83 APR 25 AM: 31

April 22, 1983

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

Dear Mr. Steele:

I request that the complaint against Preferred Lists, Inc. (Matter Under Review 1542) be dismissed.

Preferred Lists, Inc. (PLI) rented 5,000 Truly Conservative Contributor names from Working Names on behalf of our client, the Republican National Committee (RNC). (Please see the enclosed PLI purchase order to Working Names.)

Our order was placed in good faith. Neither PLI nor RNC had knowledge of any potential wrongdoing.

As soon as PLI was notified by the National Conservative Political Action Committee's attorney, Robert Sparks, of the potential problem; PLI put its only outstanding order on this list on hold.

PLI acted as a broker and has no ownership rights or shared interest in Working Names or the list, Truly Conservative Contributors.

In summary - because PLI acted in good faith and has no ownership rights in the list in question, I request that the complaint against PLI be dismissed.

Please let me know if I can supply any additional information.

Best regards.

Sincerely,

Linda L. Fisher

Linda L. Fisher
President

LLF/ccf

Enclosure

cc: Joseph McCeney, Republican National Committee
499 SOUTH CAPITOL STREET, SOUTHWEST, SUITE 504, WASHINGTON, D.C. 20003
Telephone (202) 484-1693, 484-1576

88040574740

PREFERRED LISTS INC.

WOB ORDER FOR LIST RENTAL

TO: WORKING NAMES
4421 East/West Highway
Bethesda, Maryland 20024

Attention: Christine Jespersen

PLI CLIENT:
Republican National Committee

OFFER:
Fundraising (Membership Package)

LIST:
Truly Conservative Donors

QUANTITY: 5M
(UNIVERSE- 53,891)

MATERIAL: 4 UP LABELS; KEYCODE LABELS
 MAGNETIC TAPE; 9 TRACK, 1600BPI
 OTHER

RENTAL RATE: (Net name billing requested)
\$50/M Less 20% Commission

Address from the 50 states only except as may be noted under SPECIAL INSTRUCTIONS. Omit APO, FPO, Canadian and all foreign addresses.

This is a test, please select by Nth name.
 This is a repeat, concurrent order, or continuation. Please omit names used previously. (See PLI No.)

SPECIAL INSTRUCTIONS: PLEASE MARK SHIPPING LABEL WITH NAME OF CLIENT, LIST NAME, AND QUANTITY RUN.

Sample Enclosed.

SHIP DATE: 2/14/83	SHIP DATE: 2/28/83
------------------------------	------------------------------

PLEASE NOTIFY PREFERRED FOR ANY REASON SHIPPING DATE CANNOT BE MET. If materials do not arrive by specified date, order will need to be rescheduled or cancelled.

SHIP TO: Ellen Kronman
PREFERRED LISTS, INC.
499 South Capitol St., SW
Suite 504
Washington, D.C. 20003

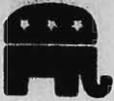
VIA: FEDERAL EXPRESS
 U.S. BLUE LABEL
 U.P.S.

ORDERED BY:

Ellen Kronman

SPECIAL NOTE: Mailer understands and guarantees that his order is for a one-time use only unless prior arrangements have been made. NO COPY OF THE LIST WILL BE MADE.
Thank you for processing this order. Send a statement of all charges to Preferred Lists, Inc. promptly after list has been shipped so that we can bill the user in behalf of the list owner. Promptly upon receipt of payment from the user we will remit to the list owner less our brokerage commission.

Preferred Lists, Inc. reserves the right to ~~place~~ orders for continuation on the above list for this mailer.



**Republican
National
Committee**

E. Mark Braden
Chief Counsel

Catherine E. Genslor
Michael A. Hess
Deputy Chief Counsels

204694

RECEIVED
644 9913
83 APR 26 11:00
P 2:04
P 2:20

April 25, 1983

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

RE: MUR 1542

Dear Mr. Steele:

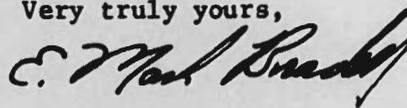
I am writing in response to your letter of April 8, 1983. Your letter stated that the Federal Election Commission had received a complaint which alleged that the Republican National Committee (RNC) may have violated certain sections of the Federal Election Campaign Act. Attached to your letter was a photostatic copy of a letter from Robert R. Sparks, Counsel for the National Conservative Political Action Committee (NCPAC). I assume that the attached letter provided the basis for your contention that a complaint had been filed alleging the RNC may have violated the Federal Election Campaign Act. The April 1st letter from Mr. Sparks does not appear to necessarily allege an RNC violation. Your initial notification letter and attached materials do not make specific references to which provisions of the FECA we are alleged to have possibly violated. More specific information would be useful for the formulation of a response.

I will attempt, in this letter, to provide additional facts to those provided in the NCPAC April 1st letter to the Commission which will further your understanding of our particular prospecting activities which may be the origin of NCPAC's letter. On January 27, 1983, the RNC ordered a test mailing to a list termed "Truly Conservative Contributors" procured through Preferred Lists, 499 South Capitol Street, S.W., Suite 504, Washington, D. C. On March 4, 1983, the RNC commenced a test mailing of 5,000 pieces to part of that list. The RNC mails approximately 17 million letters per year seeking additional donors to the Committee. As part of this mailing operation, the RNC rents over 1,000 commercial mailing lists. The RNC restricts its list acquisition to nationally recognized and respected list brokers. The RNC has never knowingly used any information from a source prohibited by federal or state law.

83040674742

If you have further questions in relation to this matter, please do not hesitate to contact me.

Very truly yours,



E. Mark Braden

EMB:jd

8 8 0 4 0 5 7 4 7 4 3

204804

RECEIVED AT THE FEC
Ccc# 9979
03 MAY 8 11:21

SEDAM & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

SUITE 1100

8300 GREENSBORO DRIVE

MCLEAN, VIRGINIA 22102

(703) 821-1000

3 MAY 8

SUITE 830

1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006

(703) 826-0000

TELEX: 710-831-0886

CABLE: SEDAMHERGE

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

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

May 4, 1983

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

Re: MUR 1541 and 1542

Dear Jon:

I enclose copies of the reply devices used in the American Printing House for the Blind mailing and a similar device used by the Republican National Committee. For ease of reference, I also enclose a copy of NCPAC's letter to the Commission listing its pseudonyms, as required by 2 U.S.C. §438(a) (4).

I understand that, in accordance with the foregoing statute, you will not reveal the enclosed pseudonym, or any other, to the respondents in these matters, and that the pseudonyms will not be made a part of the public record when the Commission closes its file in these matters.

Sincerely,



Robert R. Sparks, Jr.

enclosures

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204817

RECEIVED
GCA# 107

WORKING NAMES, INC.

4421 A East-West Highway
Bethesda, Maryland 20014

301/656-5103

83 MAY 18 1983
DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



19
P 4: 10

May 17, 1983

Mr. Kenneth A. Gross
Associated General Counsel
Federal Election Commission
Washington D.C. 20463

RE: MUR 1541 and MUR 1542

Dear Mr. Gross:

Relative to referenced MURs we at this time wish to enter a full denial of all allegations contained in your letters of April 8, 1983 and in complainants attorneys letters of March 30 and April 1, 1983.

We wish to take it one step further and ask that all charges be dismissed due to a lack of substantiating evidence relative to the charges.

Working Names, Inc. is a list management company representing two (2) owners of a list we are marketing as "Truly Conservative Contributors".

This list was compiled by the owners in a legally acceptable manner and within industry standards as demanded by various fundraising organizations.

This list has been marketed to several fundraising organizations, among them The Republican National Committee and The American Printing House for the Blind.

The arrangements for the usage of this list were made through recognized brokers within this industry.

Complainants attorney, specifically Mr. Robert Sparks, is fully aware of our position within the direct mail industry.

We submit that this matter does not belong before the commission at this time.

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page 2

We have reason to believe that the decoy submitted to the commission alleging misuse of the NCPAC list will not stand the test of what the industry would rule to be a true decoy.

Clearly, everyone would agree that a decoy must be;

1. Unique. Certainly it should not be listed in public, non-governmental records
2. A decoy may only be used once on ONE list only, It must NEVER be used on any other list anywhere.
3. It must be properly documented, so that when questions arise, the documents will support the charges of misuse or unauthorized use.

To accomplish this task, many list owners subscribe to a decoy monitoring service. We know for a fact that this complainant does indeed subscribe to just such a service.

We request a letter from the monitoring service attesting that this specific decoy is A) a decoy B) that it is properly documented by them.

In addition, we request that they furnish to the FEC a copy of all the decoys that they maintain for NCPAC on the list in question. We do not ask that we be shown this listing, but that it be made available to an independent third party for examination.

We also request that NCPAC furnish a sworn statement that this decoy was not used on other lists and that it is not available through sources other than the FEC.

We further request under oath a sworn statement from NCPAC that the purported decoy was not "planted" elsewhere for the purpose of harassment, or as part of a conspiracy to prevent other list owners or managers from renting legitimately secured lists.

So that we may ultimately prove that we are absolutely innocent of all the allegations, we request that NCPAC specifically state which one of their lists they feel we have used.

In the enclosed sealed envelope we are submitting to the Commission all the names that came from our batch #A212 used by us to fill the RNC order. We request that this envelope not be opened unless or until complainant supplies further documentation that will support their claim. We would then ask that this listing be compared to the evidence.

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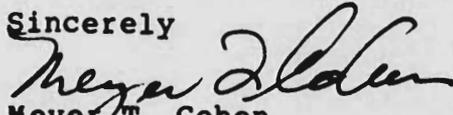
page 3

As a part of this response, we submit a sworn statement that we have not destroyed or manipulated the list or the evidence in our possession.

Upon receipt of the requested documentation, we ask that the commission examine the evidence. We are confident that this will end the matter.

If the commission feels that additional documentation from us is required, we will be glad to furnish same.

Sincerely



Meyer T. Cohen
President

8 9 0 4 0 6 7 4 7

WORKING NAMES, INC.

4421 A East-West Highway
Bethesda, Maryland 20014

301/856-5103

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



May 12, 1983

I, Meyer T. Cohen swear under oath that:

1) The decoy revealed to me will be kept confidential and not discussed with anyone other than the two owners of the list called "Truly Conservative Contributors".

2) That the list "Truly Conservative Contributors" has not been, and will not be manipulated in any way.

3) That all evidence pointing to our guilt or innocence on the question now before the Commission will be maintained in a secured fashion.

4) That should the owners of this list cause the manipulation, or destruction of evidence, I will come before the Commission and give full testimony to that fact.

Meyer T. Cohen

MEYER T. COHEN

Sworn to before me, A Notary Public in and for the State and County aforesaid, this 12 day of May, 1983.

Fil [Signature]

Notary Public

My commission expires: 7-1-86

280405/1748

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION 7/6/83-12:50

MUR # 1541/1542
DATE COMPLAINT RECEIVED
BY OGC April 4, 1983
DATE OF NOTIFICATION TO
RESPONDENT April 8, 1983
STAFF MEMBER Levin

COMPLAINANT'S NAME: National Conservative Political
Action Committee

RESPONDENTS' NAMES: Working Names, Inc.
American Printing House for the Blind
Preferred Lists
Republican National Committee

RELEVANT STATUTE: 2 U.S.C. § 438(a)(4)
11 C.F.R. § 104.15

INTERNAL REPORTS CHECKED: Pseudonym Lists from RAD
Public Records

FEDERAL AGENCIES CHECKED: None

83 JUL 6
P12: 52

SUMMARY OF ALLEGATIONS

These matters involve allegations that respondents solicited names obtained from reports filed with the Commission or with Secretaries of State by the National Conservative Political Action Committee ("NCPAC") in violation of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.

FACTUAL AND LEGAL ANALYSIS

On April 4, the General Counsel received a complaint from counsel for NCPAC stating that American Printing House for the Blind ("the Printing House") had sent a fundraising letter to one of the pseudonyms submitted by NCPAC to RAD. NCPAC further

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stated that its own investigation revealed that a list containing the pseudonym was rented to the Printing House by Working Names, Inc. Complainant alleges that Meyer T. Cohen, an officer of Working Names, has admitted that Working Names rented the list to the Printing House. The complaint proceeds to state that Mr. Cohen claimed that he was merely the broker for the list, but he refused to disclose the identities of the list owners. Finally, the complaint alleges that Mr. Cohen admits that some of the names on the list came from filings with certain Secretaries of State. This complaint was subsequently numbered as MUR 1541.

Also on April 4, this Office received a second complaint from NCPAC making reference to the first complaint and stating that the Republican National Committee ("the RNC") had sent a fundraising letter to the same pseudonym. NCPAC alleges that the RNC received its list from Preferred Lists. The complaint further claims that Preferred Lists states that Working Names provided them with the list. This complaint was subsequently numbered as MUR 1542.

The Office of General Counsel has received substantive replies from all of the respondents. The Printing House replied that it rented the names from CELCO, a New York list broker, that it entered into the agreement "in good faith and without prior knowledge" that the list might be tainted, and that the names came from a list known as "Truly Conservative." It also stated that, "to the best of its knowledge," it had never done business with Working Names or Mr. Cohen. (See Attachment 1).

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The RNC stated that it "ordered a test mailing to a list termed 'Truly Conservative Contributors' procured through Preferred Lists." It stated that it only acquires lists from "nationally recognized and respected list brokers" and "has never knowingly used any information from a source prohibited by federal or state law." (See Attachment 2).

Preferred Lists states that it rented "Truly Conservative" list names from Working Names on behalf of its client, the RNC. Preferred Lists claims that neither it nor the RNC "had knowledge of any potential wrongdoing." It went on to state that as soon as NCPAC informed it of the problem, Preferred Lists put "its only outstanding order on this list on hold." (See Attachment 3).

Meyer Cohen of Working Names admits that his company has the pseudonym, and he has sent us the portion of the list containing the pseudonym. He states that Working Names is a list management company representing two owners of the list and that the two owners compiled the list in "a legally acceptable manner." Mr. Cohen proceeded to state that the pseudonym or "decoy" submitted by NCPAC may not be a "true decoy" in that it may be obtainable from some source other than reports filed with the Commission or with Secretaries of State. (See Attachment 4). A letter has been prepared asking NCPAC to list all of the places it has published lists containing the pseudonym in question. (See Attachment 5).

Research of this Office revealed that the pseudonym was not the only example of a name from the list coinciding with NCPAC reports. The list portion sent to this Office by Mr. Cohen

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contained 212 names. After checking those names against a list of 1982 contributors to NCPAC, it appeared that approximately 14 percent of the names on the list portion submitted by Mr. Cohen also appeared on the NCPAC reports filed with the Commission for 1982.

Section 438(a)(4) of Title 2 and section 104.15 of the Commission's Regulations provide that any information copied from filed reports may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of a political committee to solicit contributions from such committee. Section 104.15(a) includes reports filed with Secretaries of State within the prohibition. In MUR 1472, where the American Legislative Exchange Council ("ALEC") rented a tainted mailing list, but appeared to have had no knowledge or suspicion that the list in question was compiled using names from the complainant's reports, the Commission found no reason to believe that ALEC violated § 438(a)(4). In this matter, the responses of the Printing House and the RNC indicate that they acted in good faith and had no knowledge or reason to know that the list they rented was tainted. Therefore, the General Counsel recommends that the Commission find no reason to believe that either the American Printing House for the Blind or the Republican National Committee

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violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. The response of Preferred Lists also indicates that it acted in good faith without "knowledge of any potential wrongdoing." Nevertheless, functioning in its capacity as an active participant in the mailing list industry, it sold a list which appears to have been originally obtained in violation of 2 U.S.C. § 438(a)(4). Such activity by an active list broker necessitates further consideration, particularly with respect to whether Preferred Lists made any inquiry as to the source of the list. Therefore, the General Counsel recommends that the Commission find reason to believe that Preferred Lists, Inc. violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.

Working Names possessed the list containing the pseudonym. It appears to be the first named source, if not the original source, of the list in each matter. Furthermore, a significant portion of the names on the list portion sent to the Office of General Counsel by Meyer Cohen appeared on the list of contributors reported by NCPAC for 1982. Based on these circumstances, the General Counsel recommends that the Commission find reason to believe that Working Names violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.

The General Counsel also recommends that the Commission approve questions to be asked of Preferred Lists, Working Names, and CELCO.

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RECOMMENDATIONS

1. Find no reason to believe that the American Printing House for the Blind violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.
2. Find no reason to believe that the Republican National Committee violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.
3. Find reason to believe that Preferred Lists, Inc. violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.
4. Find reason to believe that Working Names, Inc. violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.
5. Approve the attached letters with questions.

July 5, 1983
Date

Charles N. Steele
General Counsel

By:

Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

Attachments

1. Response from American Printing House for the Blind
2. Response from the Republican National Committee
3. Response from Preferred Lists, Inc.
4. Response from Working Names, Inc.
5. Letter to NCPAC
6. Letter to American Printing House for the Blind
7. Letter to the Republican National Committee
8. Letter to Preferred Lists, Inc.
9. Letter with questions to Working Names, Inc.
10. Letter with questions to CELCO

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMONS/JODY C. RANSOM *JCR*
DATE: JULY 7, 1983
SUBJECT: MUR 1541/1542 First General Counsel's
Report dated July 6, 1983

The above-named document was circulated to the
Commission on Wednesday, July 6, 1983 at 4:00.

Objections have been received from the Commissioners
as indicated by the name(s) checked:

Commissioner Aikens	_____
Commissioner Elliott	_____ X _____
Commissioner Harris	_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Reiche	_____

This matter will be placed on the Executive Session
agenda for Tuesday, July 12, 1983.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMONS/JODY C. RANSOM *JCR*
DATE: JULY 8, 1983
SUBJECT: OBJECTIONS - MUR 1541/1542 First General
Counsel's Report dated July 6, 1983

The above-named document was circulated to the Commission on Wednesday, July 6, 1983 at 4:00.

Objections have been received from the Commissioners as indicated by the name(s) checked:

Commissioner Aikens	_____
Commissioner Elliott	_____ X _____
Commissioner Harris	_____
Commissioner McDonald	_____ X _____
Commissioner McGarry	_____
Commissioner Reiche	_____

This matter will be placed on the Executive Session agenda for Tuesday, July 12, 1983.

88040574756

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Working Names, Inc.)	
American Printing House for the Blind)	MUR 1541/1542
Preferred Lists)	
Republican National Committee)	

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission Executive Session on July 12, 1983, do hereby certify that the Commission decided by a vote of 6-0 to take the followins actions in MUR 1541/1542:

1. Find no reason to believe that the American Printing House for the Blind violated 2 U.S.C. §438(a)(4) and 11 C.F.R. §104.15.
2. Find no reason to believe that the Republican National Committee violated 2 U.S.C. §438(a)(4) and 11 C.F.R. §104.15.
3. Find reason to believe that Preferred Lists, Inc. violated 2 U.S.C. §438(a)(4) and 11 C.F.R. §104.15.
4. Find reason to believe that Working Names, Inc. violated 2 U.S.C. §438(a)(4) and 11 C.F.R. §104.15.
5. Amend the Interrogatories submitted with the General Counsel's July 6, 1983 report, as agreed upon in the meeting.
6. Send the letters attached to the General Counsel's July 6, 1983 report except for the letter and questions to counsel for the National Conservative Political Action Committee, which is not to be sent at this time.

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

Attest:

Marjorie W. Emmons

 Marjorie W. Emmons

Secretary of the Commission

7-19-83

Date

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 15, 1983

Mrs. Carol Enters
CELCO
381 Park Avenue South
Room 919
New York, New York 10016

Dear Mrs. Enters:

Pursuant to an investigation being conducted by the Federal Election Commission, the Commission seeks responses from you to the attached interrogatories. Please submit responses to these interrogatories within ten days of your receipt of this letter. Your responses should be submitted under oath.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A), a section of the Federal Election Campaign Act of 1971, as amended, will apply. This section prohibits the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. No such consent has been given in this matter.

If you have any questions, please contact Jonathan Levin at 202-523-4529.

Sincerely,

Charles N. Steele
General Counsel

A handwritten signature in cursive script, appearing to read "Kenneth A. Gross", is written over the typed name.

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Interrogatories

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FEDERAL ELECTION COMMISSION

TO: Carol Enters
CELCO

INTERROGATORIES

For purposes of these interrogatories, the term "you" refers to either Carol Enters or CELCO, whichever is appropriate.

1. State the name, address, and phone number of the individual or entity for whom you brokered the list known as "Truly Conservative" that you later rented to the American Printing House for the Blind. If an entity is involved, state the principals of the entity and the address and phone number of these principals.
2. Have you ever inquired as to the origin of the list?
 - a. What information did you receive as to the origin of the list?
 - b. Provide the name, address, and phone number of the person who provided this information to you.
3. Have you ever done business with Working Names, Inc., or Meyer T. Cohen?
 - a. If so, list the occasions when you have done business with Working Names or Meyer T. Cohen and describe the circumstances surrounding such dealings.
 - b. State what, if any, representations were made to you as to the origin of the lists involved in the transactions referred to in your answer to question 3a. State who made each such representation and state the name, address, and phone number of this person.
4. At the time that you brokered the "Truly Conservative" list, were you aware whether or not Meyer Cohen or Working Names was in the business of producing or managing lists for political organizations?

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 15, 1983

Carson Y. Nolan, Ph.D.
President
American Printing House for the Blind, Inc.
P.O. Box 6085
Louisville, Kentucky 40206

Re: MUR 1541

Dear Dr. Nolan:

On April 8, 1983, the Commission notified you of a complaint alleging that your corporation, the American Printing House for the Blind, had violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on July 12, 1983, determined that on the basis of the information in the complaint and information provided by you, there is no reason to believe that a violation of any statute within its jurisdiction has been committed by the American Printing House for the Blind. Accordingly, the Commission closed its file in this matter as it pertains to the American Printing House for the Blind. This matter will become a part of the public record within 30 days after the file has been closed with respect to all respondents. The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

83040574760



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 15, 1983

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

Re: MUR 1542

Dear Mr. Braden:

On April 8, 1983, the Commission notified you of a complaint alleging that your committee, the Republican National Committee ("the RNC"), had violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on July 12, 1983, determined that on the basis of the information in the complaint and information provided by you, there is no reason to believe that a violation of any statute within its jurisdiction has been committed by your committee. Accordingly, the Commission closed its file in this matter as it pertains to the RNC. This matter will become a part of the public record within 30 days after the file has been closed with respect to all respondents. The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a) (4)(B) and 437g(a) (12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 15, 1983

Meyer T. Cohen
Working Names, Inc.
11600 Boiling Brook Place
Rockville, Maryland 20852

Re: MUR 1541/1542

Dear Mr. Cohen:

The Federal Election Commission notified you on April 8, 1983, of two complaints which alleged that your company, Working Names, Inc. had violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaints and information supplied by you, the Commission, on July 12, 1983, determined that there is reason to believe that Working Names, Inc. violated 2 U.S.C. § 438(a)(4), a provision of the Act, and 11 C.F.R. § 104.15, a provision of the Commission Regulations. Specifically, it appears that Working Names may have used reports filed by the National Conservative Political Action Committee ("NCPAC") with the Commission or with a Secretary of State for the purpose of soliciting contributions.

Your response to the Commission's initial notification of this complaint did not provide complete information regarding the matters in question. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. In addition, please submit answers to the enclosed questions within ten days of receipt of this letter. All statements and responses should be submitted under oath.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause. However, in the absence of any information which demonstrates that no further action should be taken against your company, the Office of General Counsel must proceed to the next compliance

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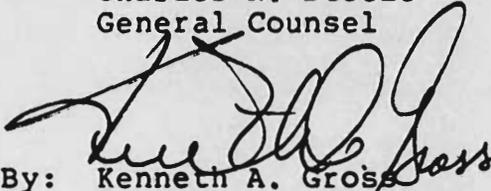
stage as noted on page 2, paragraph 2 of the enclosed procedures.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact Jonathan Levin, the attorney assigned to this matter, at 202-523-4529.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosures
Interrogatories
Procedures

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FEDERAL ELECTION COMMISSION

TO: Meyer T. Cohen
Working Names, Inc.
MURs 1541/1542

INTERROGATORIES

For purposes of these interrogatories, the term "you" refers to either Meyer Cohen or Working Names, Inc., whichever is appropriate.

1. List the names, addresses and phone numbers of all the owners of the list known as "Truly Conservative Contributors." If the owner(s) is an entity other than an individual also state the principals of the entity and the address and phone number of these principals.
2. State what, if any, representations were made to you as to the source of the list known as "Truly Conservative Contributors", and state who made each such representation.
3. Describe in detail the functions performed by you in your role as "list manager" for "Truly Conservative Contributors".
4. State whether you obtained information from reports filed with the Federal Election Commission or any Secretaries of State in order to add, subtract, or cross-check any names on "Truly Conservative Contributors", or for any other purpose.
5. To what individuals or entities did you rent or sell "Truly Conservative Contributors" after you obtained the list from the owners. State the name, address, and phone number of all such individuals or entities. If an entity is listed, provide also the names of the principals and their addresses and phone numbers.
 - a. State what, if any, representations you made to such customers concerning the origins of the list.
6. Other than the transaction involving "Truly Conservative Contributors," have you ever done business with the owners of that list?
 - a. If so, list when and under what circumstances you have done business with the list owners.
 - b. State what, if any, representations were made to you as to the source of the list(s) involved on the occasions referred to in response to Interrogatory 6a, and state who made each such representation.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 15, 1983

Linda L. Fisher, President
Preferred Lists, Inc.
499 South Capitol Street, S.W.
Suite 504
Washington, D.C. 20003

Re: MUR 1542

Dear Ms. Fisher:

On April 8, 1983, the Commission notified you of a complaint alleging that your company, Preferred Lists, Inc., had violated certain sections of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaints and information supplied by you, the Commission, on July 12, 1983, determined that there is reason to believe that Preferred Lists, Inc. violated 2 U.S.C. § 438(a)(4), a provision of the Act, and 11 C.F.R. § 104.15, a provision of the Commission Regulations. Specifically, it appears that your company may have sold a list containing names of contributors from reports filed with the Commission or with a Secretary of State by the National Conservative Political Action Committee.

Your response to the Commission's initial notification of this complaint did not provide complete information regarding the matters in question. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. In addition, please submit answers to the enclosed questions within ten days of receipt of this letter. All statements and responses should be submitted under oath.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause. However, in the absence of any information which demonstrates that no further action should be taken against your company, the Office of General Counsel must proceed to the next compliance

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Letter to Linda L. Fisher
Page 2

stage as noted on page 2, paragraph 2 of the enclosed procedures.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact Jonathan Levin, the attorney assigned to this matter, at 202-523-4529.

Sincerely,

Charles N. Steele
General Counsel



By: Kenneth A. Gross
Associate General Counsel

Enclosures
Interrogatories
Procedures

880405/4766

FEDERAL ELECTION COMMISSION

TO: Linda L. Fisher, President
Preferred Lists, Inc.

INTERROGATORIES

For purposes of these interrogatories, the term "you" refers to either Linda L. Fisher or Preferred Lists, Inc., whichever is appropriate.

1. At the time that you brokered the "Truly Conservative" list from Working Names, were you aware of whether or not Meyer Cohen or Working Names was in the business of producing or managing lists for political organizations?

2. Did you inquire as to the origin of the list?

a. What information did you receive as to the origin of the list?

b. Provide the name, address and phone number of the person who provided the information to you?

3. Have you ever done business with Working Names, Inc., or Meyer T. Cohen at other times?

a. If so, list the occasions when you have done business with Working Names or Meyer T. Cohen and describe the circumstances surrounding such dealings.

b. State what, if any, representations were made to you as to the origin of the lists involved in the transactions referred to in your answer to question 3a, and state who made each such representation.

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90
P 4:04

CELCO



carol enters list co.

381 PARK AVENUE SOUTH, NEW YORK, N.Y. 10016
(212) 684-1881

July 27, 1983

Mr. Kenneth A. Gross
Associate General Counsel
FEDERAL ELECTION COMMISSION
Washington, DC 20463

Dear Mr. Gross:

In answer to your letter of July 15th -- received by me at the above address July 20th -- I have answered the interrogatories (per the attached sheet) as follows:

- | | |
|-------------------------|--------------------------|
| 1. WORKING NAMES | |
| 4421A East-West Highway | Their new address: |
| Bethesda, MD 20014 | 1600 Boiling Brook Place |
| 301/656-5103 | Rockville, MD 20824 |
| Mike Cohen | 301/231-8001 |
| Harriet Heyman | |

2a&2b:

When I inquired as to the origin of the list TRULY CONSERVATIVE I was told that the names on the list were taken solely from information gathered by and made available to the public by the Secretaries of State in those states who maintain records on political contributions. I was informed that this information is available for review and use by any member of the public for any purpose.

3. I have been doing business with WORKING NAMES and Mike Cohen since I started CELCO in 1979, and had worked with him for a time while employed by Prescott Lists. I do not know the exact date that I started working with WORKING NAMES, as the records of PRESCOTT LISTS are not available to me at this time.

3a. WORKING NAMES (Mike Cohen) recommended various lists to me for me to represent to my various clients, and I arranged for test quantities to be ordered. In many cases the tests were successful and continuation orders of larger quantities were placed.

880405/4768

Mr. Kenneth A. Gross
FEDERAL ELECTION COMMISSION

July 27, 1983

page two

3b. Where I made inquiries as to the origin of the various lists Mike Cohen (name and address above) told me what I have already stated in the answer to Item #1.

4. To my knowledge WORKING NAMES and/or Mike Cohen has never been in the business of "PRODUCING" lists for any organization. I also have no knowledge of any affiliation with any "political organization" nor that they ever managed lists for any "political organizations."

I hereby swear under the penalties of perjury that the above information is true and correct to my personal knowledge.

Carol Enters

Carol Enters
President

July 27, 1983

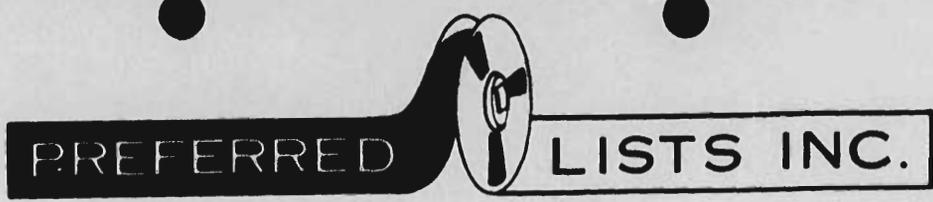
STATE OF NEW YORK
COUNTY OF New York
SWORN TO before me this
27 day of JULY, 1983

Joanna Palmer

JOANNE V. PALMER
Notary Public, State of New York
004000 Queens County
in New York County
Commission Expires March 30, 1985

88040574769

Qcc# 546



August 1, 1983

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

3 AUG 1 P 4: 22

Dear Mr. Steele:

I've enclosed Preferred List, Inc.'s response to the FEC's interrogatories (Matter Under Review 1542).

Because PLI acted in good faith and has no ownership rights in the list "Truly Conservative Contributors," I request that the complaint against PLI be dismissed. (Please see enclosed copy of intital dismissal request.)

Sincerely,

Linda L. Fisher

Linda L. Fisher
President

LLF/bmm
Enclosure

8 3 0 4 0 5 7 4 7 7 0

PREFERRED

LISTS INC.

August 1, 1983

Answers to Interrogatories

1. Preferred Lists, Inc. (PLI) was aware that Working Names rented lists to political organizations. However, PLI was not aware that Working Names, Inc. managed or produced names for political organizations.
2. Yes. At the time PLI rented (on behalf of PLI's client) the list "Truly Conservative Contributors," PLI inquired about the origin of the list.
 - (a) PLI was told that the origin of the list was Secretary of State names obtained legally and legally available for fund-raising purposes. PLI was told that the list owner was Victor Heyman.
 - (b) The information was provided by:

Mike Cohen
Working Names
11600 Boiling Brook Place
Rockville, Maryland 20852
231-8001
3. PLI has done business with Working Names for at least three years. During this time, PLI has probably placed 100 list orders with Working Names, Inc. This relationship is typical of PLI's relationship with many other list managers across the country.
 - (a) PLI has most frequently rented (on behalf of PLI clients) the Working Names managed list, "Best Conservative Working Names."
 - (b) "Best Conservative Working Names" has been represented to PLI as names belonging to a group of conservative Senators and Congressmen. This representation has been made numerous times by both Harriet Heyman and Mike Cohen of Working Names.

83040574771

PREFERRED

LISTS INC.

April 22, 1983

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

Dear Mr. Steele:

I request that the complaint against Preferred Lists, Inc. (Matter Under Review 1542) be dismissed.

Preferred Lists, Inc. (PLI) rented 5,000 Truly Conservative Contributor names from Working Names on behalf of our client, the Republican National Committee (RNC). (Please see the enclosed PLI purchase order to Working Names.)

Our order was placed in good faith. Neither PLI nor RNC had knowledge of any potential wrongdoing.

As soon as PLI was notified by the National Conservative Political Action Committee's attorney, Robert Sparks, of the potential problem; PLI put its only outstanding order on this list on hold.

PLI acted as a broker and has no ownership rights or shared interest in Working Names or the list, Truly Conservative Contributors.

In summary - because PLI acted in good faith and has no ownership rights in the list in question, I request that the complaint against PLI be dismissed.

Please let me know if I can supply any additional information.

Best regards.

Sincerely,

Linda L. Fisher
President

LLF/ccf

Enclosure

cc: Joseph McCeney, Republican National Committee

499 SOUTH CAPITOL STREET, SOUTHWEST, SUITE 504, WASHINGTON, D.C. 20003

Telephone (202) 484-1693, 484-1576

88040619772

Doc # 609

LAW OFFICES

KASWELL, PERAZICH & WATSON, P.C.

JOEL R. KASWELL
JOHN PERAZICH
MATTHEW S. WATSON**
BARRY H. GOTTFRIED**
PATRICIA A. WYNN
*ALSO ADMITTED IN MARYLAND
**ALSO ADMITTED IN NEW YORK

SUITE 720
1825 K STREET, N.W.
WASHINGTON, D.C. 20006
(202) 331-7520

OF COUNSEL
STEPHEN R. EFFROS, P.C.
VIRGINIA COUNSEL
RICHARD M. WEXELL

AUG 4 9:56

August 3, 1983

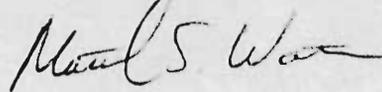
Jonathan Levin, Esq.
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

Re: MUR 1541/1542

Dear Mr. Levin:

This letter is to formally request on behalf of Working Names, Inc., Heyman Consulting Group, Inc. and Thomas L. Mays an extension of time until Friday, August 12, 1983, to respond to the Commission's letter of July 15, 1983.

Sincerely,



Matthew S. Watson

MSW:qb

98040574773

STATEMENT OF DESIGNATION OF COUNSEL

Re: MUR 1541/1542

NAME OF COUNSEL: Matthew S. Watson
ADDRESS: 1825 K Street, Suite 720
Washington, D. C. 20006
TELEPHONE: (202) 331-7530

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.

August 3, 1983

Date



Signature

NAME: Working Names, Inc.
ADDRESS: 11600 Boiling Brook Place
Rockville, Maryland 20852

HOME PHONE

BUSINESS PHONE: 231-8001

23040574774

STATEMENT OF DESIGNATION OF COUNSEL

Re: MUR 1541/1542

NAME OF COUNSEL: Matthew S. Watson
ADDRESS: 1825 K Street, Suite 720
Washington, D. C. 20006
TELEPHONE: (202) 331-7530

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.

August 3, 1983

Date

Victor K Heyman
Signature

NAME: Heyman Consulting Group, Inc.
ADDRESS: 1706 Larre Drive
Rockville, Maryland

HOME PHONE 881-4685

BUSINESS PHONE:

88040574775

STATEMENT OF DESIGNATION OF COUNSEL

Re: MUR 1541/1542

NAME OF COUNSEL: Matthew S. Watson
ADDRESS: 1825 K Street, Suite 720
Washington, D. C. 20006
TELEPHONE: (202) 331-7530

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.

7-26-83

Date

Thomas L. Mays

Signature

NAME: Thomas L. Mays
ADDRESS: 1815 17th St. N.W #502
Washington DC. 20009
HOME PHONE 232-0633
BUSINESS PHONE:

93040574775



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 5, 1983

Matthew S. Watson, Esquire
Kaswell, Perazich & Watson, P.C.
1825 K Street, N.W.
Suite 720
Washington, D.C. 20006

Re: MUR 1541/42

Dear Mr. Watson:

Pursuant to your letter of August 3, 1983, the Office of General Counsel is granting an extension of time until August 12, 1983, to respond to the Commission's letter of July 15, 1983.

Sincerely,

Charles N. Steele
General Counsel

A handwritten signature in cursive script, appearing to read "Kenneth A. Gross".

By: Kenneth A. Gross
Associate General Counsel

88040574777

WORKING NAMES, INC.

11600 Bolling Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



AUG 12 AIO: 05

August 12, 1983

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

Re: MUR 1541/42

Dear Mr. Levin:

This is in response to the Commission's request for information of July 15, 1983, to which the time for response was extended until August 12, 1982, addressed to Working Names, Inc., concerning the "Truly Conservative Contributors" list. The list is managed by Working Names, Inc., and owned jointly by Heyman Consulting Group, Inc. and Thomas L. Mays. Heyman Consulting Group, Inc. is located at 1706 Lorre Drive, Rockville, Maryland 20852 and is owned by Victor K. Heyman of the same address. Thomas L. Mays is an individual residing at 1815 - 17th Street, N.W., Washington, D.C. 20009.

In producing and distributing the lists, the functions of the participants are divided as follows. Working Names advertises and markets the lists and receives payment from the list users. Heyman performs computer processing of the list material, entering the names which it receives onto computer tapes and duplicating the tapes or producing mailing labels from the tape information. Mays obtains the names themselves.

Our clients (brokers) are advised that the sources for these lists were public records maintained by secretaires of state. The list is described as follows:

Conservative in both the political and philanthropic definition, these individuals responded to appeals of the conservative "bent." They are concerned about good health & research programs that do not lead to a welfare society.

The lists of names are obtained from filings made to various governmental bodies of contributors to state and local election campaigns. Although material on file with state secretaries of state is utilized, no material required by Federal law to be filed with the secretary of state of any state is knowingly used.

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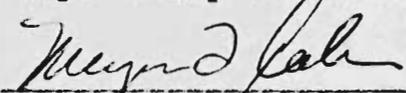
Jonathan Levin, Esq.
August 12, 1983
Page 2

Due to the presence of a decoy, it appears that part of a Federal list filed by the National Conservative Political Action Committee (NCPAC) may have inadvertently been picked up in the "Truly Conservative Contributors" list. It should be noted that the filings made by NCPAC are, as allowed, submitted to secretaries of state offices on NCPAC'S own computer printout and not an official FEC forms. As a result, if a NCPAC form were filed incorrectly by a state secretary of state, it would not be immediately apparent that a restricted Federal form had been obtained. Indeed, it appears that only a partial NCPAC list may have found its way into data for the "Truly Conservative Contributors" list, in that only one decoy has been identified, while NCPAC was allowed to include ten decoys in each filing. The misfiling by a secretary of state of a partial list would be almost impossible to detect.

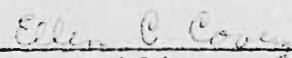
Due to the large volume of material handled, after entry of a name onto computer tape, the underlying document is not maintained. It is therefore impossible to determine from where the list with the alleged decoy was obtained. Nevertheless, in an overabundance of caution, the entire batch which included the decoy name has been deleted from any further use by Working Names, Heyman Consulting Group or Thomas Mays. The only customers which purchased the list containing the decoy name were the American Printing House for the Blind, of which you are aware from the complaint, and the Republican National Committee.

Working Names, Inc. also markets another list of conservative contributors and a list of liberal contributors also owned by Heyman Consulting Group and Thomas L. Mays. These lists are collected and represented in the same manner.

Respectfully submitted,


Meyer T. Cohen

Subscribed and sworn before me this 11th day of August, 1983.


Notary Public

My commission expires: 7-7-86

38040574779

I have read the letter dated August 12, 1983, relative to
MUR 1541/42.

Respectfully,

Victor K. Heyman
Victor K. Heyman

Subscribed and sworn before me this 11th day of August, 1983.

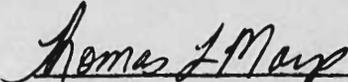
Ellen C. Cory
Notary Public

My Commission Expires: 7-1-86

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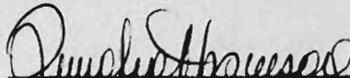
I have read the letter dated August 12, 1983, relative to
MUR 1541/42.

Respectfully,



Thomas L. Mays

Subscribed and sworn before me this 11 day of August, 1983.



Notary Public

My Commission Expires: 14 May 1984

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SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

83 SEP 23 P 3: 14

September 23, 1983

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

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

SUBJECT: Letter to Complainant in MUR 1541/42

On April 4, 1983, the Commission received a complaint from the National Conservative Political Action Committee ("NCPAC") alleging that names obtained from reports filed by NCPAC with the Commission or with Secretaries of State were solicited by respondents, American Printing House for the Blind and Republican National Committee, in violation of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. Included in the complaint was an allegation that Working Names, Inc., ("Working Names") had rented a list containing a NCPAC pseudonym to two of the respondents, but that Working Names would not disclose the identities of the list owners. In response to the complaint, Working Names asserted that NCPAC may have used the pseudonym in reports other than those required to be filed by federal law.

On July 12, 1983, the Commission found reason to believe that Working Names violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15 and approved questions to be sent to the respondent. 1/ The Commission also determined that a letter questioning NCPAC as to whether it placed the pseudonym on any reports other than the report of contributors submitted to the Commission should not be sent at that time. It was suggested that more information should be obtained from the respondents before subjecting the complainant to the above question.

1/ Also on that date, the Commission found reason to believe that Preferred Lists, Inc. had violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15, and no reason to believe that the American Printing House for the Blind and the Republican National Committee had violated those provisions.

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In a meeting with counsel for Working Names on August 3, 1983, and in a letter received from Meyer T. Cohen, President of Working Names, on August 12, 1983, (Attachment 1) it was revealed that the list owners are Heyman Consulting Group, Inc. of Rockville, Maryland and Thomas L. Mays of Washington, D.C. Both counsel for the list owners and Mr. Cohen stated that, while the Heyman Group performs computer processing of the list material, Mr. Mays provides the names for such lists. According to the responses, Mr. Mays travels to the various offices of the Secretaries of State and obtains the filings made for state and local elections and does not "knowingly" use any material required by federal law to be filed with a Secretary of State. In addition, in his written response Mr. Cohen maintains that NCPAC filings are made on computer printouts, and, if a NCPAC form were filed incorrectly by a Secretary of State, "it would not be immediately apparent that a restricted federal form had been obtained." Mr. Cohen further states that, "[d]ue to the large volume of material handled, after entry of a name onto computer tape, the underlying document is not maintained," therefore, the source of the "alleged decoy" cannot be determined. 2/

This Office contacted the Boards of Elections in Virginia and Maryland and was told that reports for state committees and federal political committees are kept in separate files and segregated from one another. Based upon this information, the response of Working Names, and the information provided by counsel for Messrs. Mays and Heyman, an inquiry as to whether NCPAC included the pseudonym in a report of a non-federal account appears timely. Therefore, the General Counsel recommends that the Commission approve the attached letter addressed to NCPAC's counsel.

Recommendation

Approve the attached letter.

Attachments

- 1) Letter from Working Names, Inc., dated August 12, 1983, and accompanying affidavits.
- 2) Proposed letter to Robert R. Sparks, counsel for NCPAC.

2/ Accompanying Mr. Cohen's response were sworn statements from Victor K. Heyman of the Heyman Group and Mr. Mays stating that they had read the letter.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1541/42
Working Names, Inc.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 29, 1983, the Commission approved by a vote of 6-0 the letter as submitted with the General Counsel's September 23, 1983 Memorandum to the Commission.

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

Attest:

9-30-83

Date

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

83040574784

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

9-23-83, 3:14
9-26-83, 11:00



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 3, 1983

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

Dear Mr. Sparks:

Pursuant to an investigation being conducted by the Federal Election Commission, the Commission seeks a response from your client, the National Conservative Political Action Committee, to the following interrogatory:

Did the National Conservative Political Action Committee include the pseudonym, _____, on any list or report other than the report of contributors submitted to the Federal Election Commission? If so, state the identity of the list or report, where the list or report was filed, and when this filing took place.

Please submit a response to this interrogatory within ten days of your receipt of this letter. Your response should be submitted under oath.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A), a section of the Federal Election Campaign Act of 1971, as amended, will apply. This section prohibits the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. No such consent has been given in this matter.

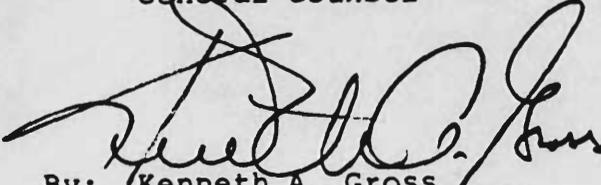
93040579783

Letter to Robert R. Sparks, Jr., Esq.
Page 2

If you have any questions, please contact Jonathan Levin at
202-523-4060.

Sincerely,

Charles N. Steele
General Counsel



By: Kenneth A. Gross
Associate General Counsel

83040574786

SEDAM & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

SUITE 1100

6300 GREENSBORO DRIVE

MCLEAN, VIRGINIA 22102

(703) 821-1000

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

JOHN ROBERT CLARK III
B. ERIC SIVERTSEN
SHARON L. POWERS
CLAIRE M. SOCCELLA

October 18, 1983

GC # 994
OCT 20 P 1:44
L-2110
N 12-11
SUITE 820
1700 PENNSYLVANIA AVENUE, N. W.
WASHINGTON, D. C. 20006
(703) 821-1000
TELEX: 710-831-0896
CABLE: SEDAMHERGE
OF COUNSEL
JAMES EDWARD ABLARD
THOMAS J. FADOU, JR.

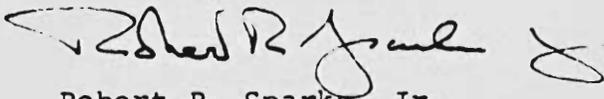
Mr. Jonathan Levin
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. Levin:

In response to the October 3, 1983 letter to me from Mr. Gross, I advise you that, according to information received from National Conservative Political Action Committee, the pseudonym _____ was not used by NCPAC on any report or list of names filed with any agency other than the Federal Election Commission.

The foregoing is true and accurate to the best of my information and belief, based upon information provided by National Conservative Political Action Committee.

Sincerely,



Robert R. Sparks, Jr.

Subscribed and sworn to before me this 18th day of October, 1983.

Carolyn C. Knoll
Notary Public

Commissioned: Carolyn S. Cecchini

My Commission Expires:

June 1, 1985

83040514787

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
FEBRUARY 2 1984
FEDERAL ELECTION COMMISSION

In the Matter of
Working Names, Inc.
Preferred Lists, Inc.

)
)
)
)

MUR 1541/42

84 FEB 2 P 2: 01

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On April 4, 1983, the General Counsel received a complaint from counsel for the National Conservative Political Action Committee ("NCPAC") stating that American Printing House for the Blind ("the Printing House") had sent a fundraising letter to one of the pseudonyms submitted by NCPAC to the Reports Analysis Division, and that violations of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15 had occurred. NCPAC states that its own investigation revealed that a list containing the pseudonym was rented to the Printing House by Working Names, Inc. ("Working Names"). NCPAC further alleges that Meyer T. Cohen, an officer of Working Names, has admitted that Working Names rented the list to the Printing House. The complaint also states that Mr. Cohen claimed that he was merely the broker for the list, but he refused to disclose the identities of the list owners. Finally, the complaint alleges that Mr. Cohen admits that some of the names on the list came from filings with certain Secretaries of State. This complaint was subsequently numbered as MUR 1541.

Also on April 4, this Office received a second complaint from NCPAC referencing the first complaint and stating that the Republican National Committee ("the RNC") had sent a fundraising letter to the same pseudonym. NCPAC alleges that the

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RNC received its list from Preferred Lists. The complaint further claims that Preferred Lists states that Working Names provided them with the list. This complaint was subsequently numbered as MUR 1542.

On July 15, 1983, the Commission found no reason to believe that the Printing House or the RNC violated 2 U.S.C. § 438(a)(4) or 11 C.F.R. § 104.15. The Commission, however, found that there was reason to believe Preferred Lists and Working Names violated those sections of the Act and Regulations. Interrogatories were sent to Preferred Lists and Working Names and also to Carol Enters List Company ("CELCO"), the list broker for the transaction involving the Printing House.

In a meeting with counsel for Working Names on August 3, 1983, 1/ and in a letter received from Meyer T. Cohen, President of Working Names, on August 12, 1983, it was revealed that the list owners are Victor Heyman and Heyman Consulting Group, Inc. ("Heyman Consulting") of Rockville, Maryland and Thomas L. Mays of Washington, D.C. Mr. Cohen's response indicated that the functions of the participants dealing with the list were divided as follows: Working Names advertises and markets the list and receives payment from the list users, Victor Heyman and Heyman Consulting perform computer processing of the list material, entering the names which they receive onto computer tapes

1/ The designation of counsel filed by Working Names indicates that Mr. Watson is counsel for Working Names, Thomas L. Mays and Heyman Consulting.

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and duplicating the tapes or producing mailing labels from the tape information, and Mays obtains the names themselves.

According to oral representations by counsel and Meyer Cohen's written response, Mr. Mays travels to the various offices of the Secretaries of State and obtains the filings made for state and local elections and does not "knowingly" use any material required by federal law to be filed with a Secretary of State. In addition, in his written response, Mr. Cohen maintains that NCPAC filings are made on computer printouts and, if a NCPAC form were filed incorrectly by a Secretary of State, "it would not be immediately apparent that a restricted federal form had been obtained." Mr. Cohen's response further states that, "[d]ue to the large volume of material handled, after entry of a name onto computer tape, the underlying document is not maintained," and, therefore, the source of the "alleged decoy" cannot be determined. Accompanying Mr. Cohen's response were sworn statements from Mr. Heyman and Mr. Mays stating that they had read his letter. (See Attachment 1).

Responses from CELCO and Preferred Lists, received in late July and early August, state that Working Names informed them that it obtained the names for the list solely from information on file with Secretaries of State and that the names were legally available for the purposes contemplated. (See Attachments 2 and 3).

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This Office contacted the Boards of Election in Virginia and Maryland and was told that reports for state committees and federal political committees are kept in separate files and segregated from one another. Based upon this information, this Office, with the Commission's approval, sent a letter, on October 3, 1983, to the complainant asking it if it had included the solicited pseudonym on any list or report other than the report of contributors submitted to the Commission. On October 18, NCPAC replied that the pseudonym "was not used by NCPAC on any report or list of names filed with any agency other than the Federal Election Commission." (See Attachment 4).

II. LEGAL ANALYSIS

Respondent Working Names, through Meyer Cohen and counsel, has indicated that the list in question is owned by Thomas Mays and Victor Heyman and Heyman Consulting. Respondent asserts that Mr. Mays obtained the names for the list from non-federal filings with various secretaries of state and gave them to Mr. Heyman and Heyman Consulting who put the names onto computer tapes and made them available to Working Names.

As NCPAC has denied, in a sworn statement, placing the solicited pseudonym on any list other than the one filed with the Commission, there appear to be three possible explanations of the appearance of the pseudonym on the "Truly Conservative" list: (1) Mr. Mays took the name from FEC filings and passed it on to Mr. Heyman and Heyman Consulting; (2) Mr. Heyman and Heyman

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Consulting added the improperly obtained pseudonym to the list of legally obtained names provided by Mr. Mays; or (3) Meyer Cohen and Working Names supplemented the list received from Heyman Consulting with improperly obtained names.

The Office of General Counsel, therefore, recommends that the Commission extend its investigation to include all principals in the list offering, namely, Meyer Cohen 2/, Thomas L. Mays, Victor K. Heyman and the Heyman Consulting Group, Inc. Accordingly, this Office has drafted questions to be addressed to Mr. Mays and Mr. Heyman.

The attached questions were drafted with the intent of determining the source of the names. In another matter involving section 438(a)(4), MUR 1549, Mr. Mays was named as a possible source of a mailing list. In that matter, he was able to identify specific Secretary of State offices as sources of names and addresses for the list in question. Once specific offices are identified, the Commission may be able to determine the source of the names (lists of federal or non-federal candidates) and whether the copying of names of contributors supporting federal candidates was inadvertant or not. Furthermore, while counsel for Working Names is also counsel for Mr. Mays

2/ Mr. Cohen is the president of Working Names. In addition to responding personally to the allegations made in this matter, he has been named individually as a respondent in another matter pertaining to a section 438(a)(4) violation, MUR 1472.

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and Heyman Consulting and while Mr. Cohen claims that the source of the pseudonym cannot be determined, the Commission has not received any direct sworn statements from Mr. Mays or Mr. Heyman and Heyman Consulting regarding the facts of this matter. The only input from them has been sworn affidavits that they read Mr. Cohen's response.

Based on the foregoing analysis, the General Counsel recommends that the Commission find reason to believe that Meyer T. Cohen, Thomas L. Mays, Victor K. Heyman and the Heyman Consulting Group, Inc. violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. The General Counsel also recommends approval of questions to be sent to Mr. Mays and Mr. Heyman.

Additionally, because both MURs 1541 and 1542 appear to involve the same pseudonym and mailing list, and because the significant parties involved in both matters are the same, it appears that efficiency would be best served by merging the two matters. Therefore, the General Counsel recommends that the Commission merge MUR 1541 into MUR 1542.

III. RECOMMENDATIONS

1. Merge MUR 1541 into MUR 1542.
2. Find reason to believe that Meyer T. Cohen violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.
3. Find reason to believe that Thomas L. Mays violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.

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4. Find reason to believe that Victor K. Heyman and the Heyman Consulting Group, Inc. violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.
5. Approve the attached letter with questions.

February 3, 1984
Date

Charles N. Steele
General Counsel

By:


Kenneth A. Gross
Associate General Counsel

Attachments

1. Response from Working Names, Inc., dated August 12, 1983.
2. Response from CELCO, dated July 27, 1983.
3. Response from Preferred Lists, Inc., dated August 11, 1983.
4. Letter from NCPAC, dated October 18, 1983.
5. Letter to Matthew Watson, counsel for respondents, with General Counsel's Factual and Legal Analysis and questions.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1541/42
Working Names, Inc.)
Preferred Lists, Inc.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 7, 1984, the Commission decided by a vote of 5-0 to take the following actions in MUR 1541/42:

1. Merge MUR 1541 into MUR 1542.
2. Find reason to believe that Meyer T. Cohen violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.
3. Find reason to believe that Thomas L. Mays violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.
4. Find reason to believe that Victor K. Heyman and the Heyman Consulting Group, Inc. violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.
5. Approve the letter with questions as submitted with the General Counsel's Report signed February 3, 1984.

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

Attest:

2-7-84

Date

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

83040574795



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 13, 1984

Matthew S. Watson, Esquire
Kaswell, Perazich & Watson, P.C.
1825 K Street, N.W.
Suite 720
Washington, D.C. 20006

Re: MUR 1542
Meyer T. Cohen
Thomas L. Mays
Victor K. Heyman and the
Heyman Consulting Group, Inc.

Dear Mr. Watson:

On July 12, 1983, the Federal Election Commission found reason to believe that your client, Working Names, Inc., violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. Upon review of the responses received in this matter, the Commission, on February 7, 1984, determined that there is reason to believe that your clients, Meyer T. Cohen, Thomas L. Mays, and Victor K. Heyman and the Heyman Consulting Group, Inc., violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. Specifically, it appears that they may have used reports filed by the National Conservative Political Action Committee ("NCPAC") with the Commission for the purpose of soliciting contributions or for commercial purposes. For each client, the General Counsel has enclosed a factual and legal analysis, which formed a basis for the Commission's finding.

You may submit any factual and legal materials which you believe are relevant to the Commission's analysis of this matter. In addition, please have Mr. Mays and Mr. Heyman submit answers to the attached interrogatories within ten days of your receipt of this letter. All responses should be submitted under oath.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause. However, in the absence of any information which demonstrates that no further action should be taken against your clients, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

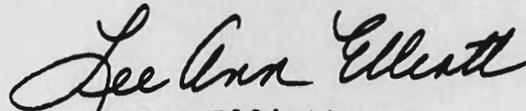
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Letter to Matthew S. Watson
Page 2

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact Jonathan M. Levin, the attorney, assigned to this matter at 523-4060.

Sincerely,



Lee Ann Elliott
Chairman

Enclosures

Procedures

General Counsel's Factual and Legal Analysis for Meyer T. Cohen

General Counsel's Factual and Legal Analysis for Thomas L. Mays
and attached interrogatories

General Counsel's Factual and Legal Analysis for Victor K.
Heyman and the Heyman Consulting Group, Inc. and attached
interrogatories

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GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1542
STAFF MEMBER(S) & TEL. NO.
Jonathan Levin
202-523-4060

RESPONDENT Meyer T. Cohen

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

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On April 4, 1983, the General Counsel received a complaint from counsel for the National Conservative Political Action Committee ("NCPAC") stating that American Printing House for the Blind ("the Printing House") had sent a fundraising letter to one of the pseudonyms submitted by NCPAC to the Reports Analysis Division, and that violations of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15 had occurred. NCPAC states that its own investigation revealed that a list containing the pseudonym was rented to the Printing House by Working Names, Inc. ("Working Names"). NCPAC further alleges that Meyer T. Cohen, an officer of Working Names, has admitted that Working Names rented the list to the Printing House. The complaint also states that Mr. Cohen claimed that he was merely the broker for the list, but he refused to disclose the identities of the list owners. Finally, the complaint alleges that Mr. Cohen admits that some of the names on the list came from filings with certain Secretaries of State. This complaint was subsequently numbered as MUR 1541.

Also on April 4, this Office received a second complaint from NCPAC referencing the first complaint and stating that the Republican National Committee ("the RNC") had sent a fundraising letter to the same pseudonym. NCPAC alleges that the

RNC received its list from Preferred Lists. The complaint further claims that Preferred Lists states that Working Names provided them with the list. This complaint was subsequently numbered as MUR 1542.

FACTUAL BASIS AND LEGAL ANALYSIS

In a meeting with counsel for Working Names on August 3, 1983, and in a letter received from Meyer T. Cohen, President of Working Names, on August 12, 1983, it was revealed that the list owners are Victor Heyman and Heyman Consulting Group, Inc. ("Heyman Consulting") of Rockville, Maryland and Thomas L. Mays of Washington, D.C. Mr. Cohen's response indicated that the functions of the participants dealing with the list were divided as follows: Working Names advertises and markets the list and receives payment from the list users, Victor Heyman and Heyman Consulting perform computer processing of the list material, entering the names provided by Thomas Mays onto computer tapes and duplicating the tapes or producing mailing labels from the tape information, and Mays obtains the names themselves. According to oral representations by counsel and Meyer Cohen's written response, Mr. Mays travels to the various offices of the Secretaries of State and obtains the filings made for state and local elections.

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II. LEGAL ANALYSIS

Respondent Working Names, through Meyer Cohen and counsel, has indicated that the list in question is owned by Thomas Mays and Victor Heyman and Heyman Consulting. Respondent asserts that Mr. Mays obtained the names for the list from non-federal filings with various secretaries of state and gave them to Mr. Heyman and Heyman Consulting who put the names onto computer tapes and made them available to Working Names. By his own admission, Meyer T. Cohen appears to have been involved in the offering of the list containing the pseudonym. The Office of General Counsel, therefore, recommends that the Commission extend its investigation to include Meyer T. Cohen and find reason to believe that he violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.

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GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1542
STAFF MEMBER(S) & TEL. NO.
Jonathan Levin
202-523-4060

RESPONDENT Thomas L. Mays

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

On April 4, 1983, the General Counsel received a complaint from counsel for the National Conservative Political Action Committee ("NCPAC") stating that American Printing House for the Blind ("the Printing House") had sent a fundraising letter to one of the pseudonyms submitted by NCPAC to the Reports Analysis Division, and that violations of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15 had occurred. NCPAC states that its own investigation revealed that a list containing the pseudonym was rented to the Printing House by Working Names, Inc. ("Working Names"). NCPAC further alleges that Meyer T. Cohen, an officer of Working Names, has admitted that Working Names rented the list to the Printing House. The complaint also states that Mr. Cohen claimed that he was merely the broker for the list, but he refused to disclose the identities of the list owners. Finally, the complaint alleges that Mr. Cohen admits that some of the names on the list came from filings with certain Secretaries of State. This complaint was subsequently numbered as MUR 1541.

Also on April 4, this Office received a second complaint from NCPAC referencing the first complaint and stating that the Republican National Committee ("the RNC") had sent a fundraising letter to the same pseudonym. NCPAC alleges that the

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II. LEGAL ANALYSIS

Respondent Working Names, through Meyer Cohen and counsel, has indicated that the list in question is owned by Thomas Mays and Victor Heyman and Heyman Consulting. Respondent asserts that Mr. Mays obtained the names for the list from non-federal filings with various secretaries of state and gave them to Mr. Heyman and Heyman Consulting who put the names onto computer tapes and made them available to Working Names. Thomas Mays appears to own the list containing the pseudonym and also appears to have been involved in the creation of the list. Thus far, however, the only comprehensive statement that we have concerning Mays' role comes from Respondent Working Names. The Office of General Counsel, therefore, recommends that the Commission extend its investigation to include Thomas Mays and find reason to believe that Thomas Mays violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.

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FEDERAL ELECTION COMMISSION

TO: Thomas L. Mays

INTERROGATORIES

1. State whether you provided names to Victor Heyman and Heyman Consulting Group, Inc. for production of a list known as "Truly Conservative Contributors"?

a. If you provided such names, state the dates you provided the names.

2. State the sources of the names for "Truly Conservative Contributors."

a. If the sources are from secretary of state offices or other offices where election finance reports are filed, list the states and/or localities involved and specify the offices involved (e.g. state board of elections).

b. For each source listed in response to 2a, state the reporting periods covered.

3. Describe in detail the procedure whereby you and/or your employees or agents gathered the names for "Truly Conservative Contributors." Your answer should include, but not be limited to, a statement of whether the names were obtained by mail or at the records offices themselves and a statement of how you, your agents, and/or your employees distinguished between contributors to federal and non-federal committees.

4. State whether you offered the names which ultimately comprised "Truly Conservative Contributors" to anyone or any entity other than Victor Heyman and the Heyman Consulting Group, Inc.

a. List the names and addresses of all parties to whom all such offers were made.

5. State all representations concerning the source of the list that you and/or your agents and/or employees made to Victor Heyman, Heyman Consulting Group, Inc., and to anyone else who obtained the names that comprised "Truly Conservative Contributors."

a. State to whom such representations were made, when they were made and by whom they were made.

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GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1542
STAFF MEMBER(S) & TEL. NO.
Jonathan Levin
202-523-4060

RESPONDENT Victor K. Heyman and the Heyman Consulting Group, Inc.

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

On April 4, 1983, the General Counsel received a complaint from counsel for the National Conservative Political Action Committee ("NCPAC") stating that American Printing House for the Blind ("the Printing House") had sent a fundraising letter to one of the pseudonyms submitted by NCPAC to the Reports Analysis Division, and that violations of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15 had occurred. NCPAC states that its own investigation revealed that a list containing the pseudonym was rented to the Printing House by Working Names, Inc. ("Working Names"). NCPAC further alleges that Meyer T. Cohen, an officer of Working Names, has admitted that Working Names rented the list to the Printing House. The complaint also states that Mr. Cohen claimed that he was merely the broker for the list, but he refused to disclose the identities of the list owners. Finally, the complaint alleges that Mr. Cohen admits that some of the names on the list came from filings with certain Secretaries of State. This complaint was subsequently numbered as MUR 1541.

Also on April 4, this Office received a second complaint from NCPAC referencing the first complaint and stating that the Republican National Committee ("the RNC") had sent a fundraising letter to the same pseudonym. NCPAC alleges that the

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RNC received its list from Preferred Lists. The complaint further claims that Preferred Lists states that Working Names provided them with the list. This complaint was subsequently numbered as MUR 1542.

FACTUAL BASIS AND LEGAL ANALYSIS

In a meeting with counsel for Working Names on August 3, 1983, and in a letter received from Meyer T. Cohen, President of Working Names, on August 12, 1983, it was revealed that the list owners are Victor Heyman and Heyman Consulting Group, Inc. ("Heyman Consulting") of Rockville, Maryland and Thomas L. Mays of Washington, D.C. Mr. Cohen's response indicated that the functions of the participants dealing with the list were divided as follows: Working Names advertises and markets the list and receives payment from the list users, Victor Heyman and Heyman Consulting perform computer processing of the list material, entering the names provided by Thomas Mays onto computer tapes and duplicating the tapes or producing mailing labels from the tape information, and Mays obtains the names themselves. According to oral representations by counsel and Meyer Cohen's written response, Mr. Mays travels to the various offices of the Secretaries of State and obtains the filings made for state and local elections.

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II. LEGAL ANALYSIS

Respondent Working Names, through Meyer Cohen and counsel, has indicated that the list in question is owned by Thomas Mays and Victor Heyman and Heyman Consulting. Respondent asserts that Mr. Mays obtained the names for the list from non-federal filings with various secretaries of state and gave them to Mr. Heyman and Heyman Consulting who put the names onto computer tapes and made them available to Working Names. Victor K. Heyman and the Heyman Consulting Group, Inc. appear to have been involved in the creation and offering of the list containing the pseudonym. Thus far, however, the only comprehensive statement that we have concerning their role comes from Respondent Working Names. The Office of General Counsel, therefore, recommends that the Commission extend its investigation to include Victor K. Heyman and the Heyman Consulting Group, Inc. and find reason to believe that they violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.

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FEDERAL ELECTION COMMISSION

TO: Victor K. Heyman
Heyman Consulting Group, Inc.

INTERROGATORIES

For the purpose of these interrogatories, the term "you" refers to Victor K. Heyman, the Heyman Consulting Group, Inc., or both, whichever is appropriate.

1. State whether you received names from Thomas L. Mays which were used to produce a list known as "Truly Conservative Contributors."
 - a. If Mr. Mays provided such names, state the dates on which he provided the names.
 - b. State the names and addresses of all other sources from which such names were received.
2. State all representations made to you by Mr. Mays as to the source of the names for "Truly Conservative Contributors."
3. State all representations made to you by sources, other than Mr. Mays, that provided names for "Truly Conservative Contributors."
4. State the functions you performed with respect to the list material. Your response should include, but not be limited to, a statement of whether you supplemented and/or updated the list of names with other names you obtained.
 - a. If you did update or supplement the list of names, state the source(s) of the names you used for the updating or supplementation and how they were obtained.

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RECEIVED AT THE FEC

Case # 1733

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LAW OFFICES
KASWELL, PERAZICH & WATSON, P.C.

SUITE 720
1625 K STREET, N.W.
WASHINGTON, D.C. 20006
(202) 331-7530

OF COUNSEL
MARK PESTRONK
VIRGINIA COUNSEL
RICHARD M. WEXELL

JOEL R. KASWELL
JOHN PERAZICH*
MATTHEW S. WATSON**
BARRY H. GOTTFRIED**
PATRICIA A. WYNN
RAYMOND C. BERSHTEIN
*ALSO ADMITTED IN MARYLAND
**ALSO ADMITTED IN NEW YORK

February 21, 1984

10:57

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

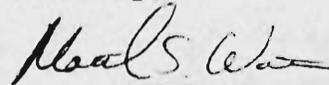
Re: MUR 1542

Dear Mr. Levin:

This letter is to formally request on behalf of Meyer T. Cohen, Thomas L. Mays, Victor Heyman and the Heyman Consulting Group, Inc. an extension of time of 30 days from February 24, 1984, in which to respond to the Commission's letter of February 13, 1984.

The extension is required as both Thomas L. Mays and Victor Heyman are travelling outside of the area.

Sincerely,



Matthew S. Watson

MSW

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 2, 1984

Matthew S. Watson, Esquire
Kaswell, Perazich & Watson, P.C.
1825 K Street, N.W.
Suite 720
Washington, D.C. 20006

Re: MUR 1542

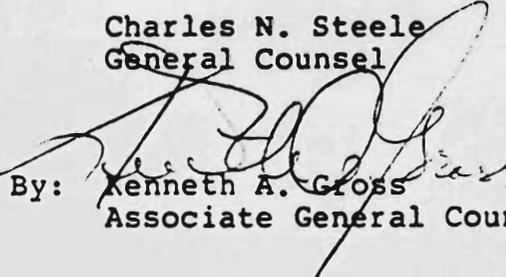
Dear Mr. Watson:

On February 24, 1984, the Office of General Counsel received your letter requesting an extension of time of 30 days from February 24, 1984, in which to respond to the reason to believe notifications. This Office has decided to grant an extension of 20 days from February 24. The responses are, therefore, due on March 15, 1984.

If you have any questions, please contact Jonathan M. Levin at 523-4060.

Sincerely,

Charles N. Steele
General Counsel

By: 
Kenneth A. Gross
Associate General Counsel

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LAW OFFICES
KASWELL, PERAZICH & WATSON, P.C.

SUITE 720
1825 K STREET, N.W.
WASHINGTON, D.C. 20006
(202) 331-7530

RECEIVED
OFFICE OF THE
COMMISSIONER
SECRETARY

84 MAR 15 P 2: 54

OF COUNSEL
MARK PESTRONK
VIRGINIA COUNSEL
RICHARD M. WEXELL

JOEL R. KASWELL
JOHN PERAZICH*
MATTHEW S. WATSON**
BARRY H. GOTTFRIED**
PATRICIA A. WYNN
RAYMOND C. BERSHTEIN
*ALSO ADMITTED IN MARYLAND
**ALSO ADMITTED IN NEW YORK

March 15, 1984

The Hon. Lee Ann Elliott
Chairman
Federal Election Commission
Washington, D.C. 20463

Re: MUR1542
Meyer T. Cohen
Thomas L. Mays
Victor K. Heyman and the
Heyman Consulting Group, Inc.

Dear Ms. Elliott:

This letter is in response to your letter of February 13, 1984, the date for response to which was extended by the General Counsel to March 15th. I have enclosed sworn answers to interrogatories by Victor K. Heyman, on behalf of himself and Heyman Consulting Group, Inc., and Thomas Mays.

The facts presented in the General Counsel's Factual and Legal Analysis are not disputed. The two complaints filed by National Conservative Political Action Committee allege only that a single pseudonym, or decoy, was discovered in the lists prepared and rented by respondents. Although respondents have no knowledge, it can be reasonably assumed that NCPAC, being permitted to use as many as ten decoy names, used more than one decoy in its filings with the Commission. It is therefore apparent that if any violation occurred, it involved only the use of a partial list submitted by NCPAC to the Commission. Had a full NCPAC list been used by the respondents, more than one decoy would have appeared and been discovered. The fact that only one decoy name appeared can be presumed. The Complainant NCPAC has had the ability to fully check the subject "Truly Conservative Contributors" list, both through receipt of material addressed to any pseudonym which appeared and directly from a copy of the list which complainant NCPAC itself rented from respondent Working Names, Inc. If any other decoy was included, a further complaint would clearly have been forthcoming. The fact that no further complaint has been alleged for nearly a year, although the Complainant has had access to the list, indicates that there is no ongoing violation, if any violation occurred.

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Lee Ann Elliott
March 14, 1984
Page Two

A more reasonable explanation of the inclusion of the single decoy is that a partial NCPAC list was incorrectly filed in the Office of a secretary of state causing it to be represented by the government office as a state, rather than Federally required filing. Respondents would then have unknowingly received this partial list. Since NCPAC files its reports on generic computer print-outs, rather than Federal Election Commission forms, the misfiling would not have been obvious. If such a misfiling occurred, the respondents use of the partial list would be innocent. Respondents had no intent to use in whole or in part any list filed in any place by NCPAC pursuant to any Federal law.

For the above-stated reasons, we submit that there is no probable cause to believe that a violation of the statute has occurred with regard to any respondent. If the General Counsel's Office, however, believes that a technical violation has occurred without willful intent, respondents are prepared to enter into a conciliation agreement to settle this matter.

Respectfully submitted,



Matthew S. Watson

MSW:clg

Enclosure

cc: Jonathan Levin, Esq.

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**BEFORE THE
FEDERAL BOARD OF ELECTIONS**

MUR N 1542

ANSWERS OF VICTOR K. HEYMAN TO INTERROGATORIES

Victor Heyman, being duly sworn, gives the following answers on behalf of himself and Heyman Consulting Group, Inc.

INTERROGATORY NO. 1

State whether you received names from Thomas L. Mays which were used to produce a list known as "Truly Conservative Contributors."

- a. If Mr. Mays provided such names, state the dates on which he provided the names.
- b. State the names and addressesses of all other sources from which such names were received.

ANSWER

Heyman Consulting Group, Inc. received names from Thomas L. Mays which were used to produce a list known as "Truly Conservative Contributors"

- a. Mr. Mays provided names used in said list between July 1982 and September 1983. I do not have a record of the precise dates.
- b. There were no other sources.

INTERROGATORY NO. 2

State all representations made to you by Mr. Mays as to the source of the names for "Truly Conservative Contributors."

ANSWER

Mr. Mays represented that the names were obtained from public records maintained by State Secretaries of State concerning non-federal elections.

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INTERROGATORY NO. 3

State all representations made to you by sources, other than Mr. Mays, that provided names for "Truly Conservative Contributors"

ANSWER

No other sources were used.

INTERROGATORY NO. 4

State the functions you performed with respect to the list material. Your response should include, but not be limited to, a statement of whether you supplemented and/or updated the list of names with other names you obtained.

- a. If you did update or supplement the list of names, state the source(s) of the names you used for the updating or supplementation and how they were obtained.

ANSWER

Heyman Consulting Group, Inc. performed computer processing of list material, including entering the names which it received onto computer tapes and duplicating the tapes for producing mailing labels from the tape information.

- a. Heyman Consulting Group, Inc. did not update or supplement the list. It did delete names after notice that a decoy name may have been included.

Victor K Heyman
VICTOR K. HEYMAN

Subscribed and sworn to before me this 13th day of March, 1984.

Dore D. Harvey
Notary Public

My Commission expires: My Commission Expires September 22, 1986

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BEFORE THE
FEDERAL BOARD OF ELECTIONS

MUR N. 1542

ANSWERS OF THOMAS L. MAYS TO INTERROGATORIES

Thomas L. Mays, being duly sworn, give the following answers on behalf of himself.

INTERROGATORY NO. 1

State whether you provided names to Victor Heyman and Heyman Consulting Group, Inc. for production of a list know as "Truly Conservative Contributors"?

a. If you provided such names, state the dates you provided the names.

ANSWER

I submitted names to Heyman Consulting Group, Inc. which I believe, but do not have direct knowledge, were used for production of a list known as "Truly Conservative Contributors."

a. I submitted names between July, 1982 and September, 1983. I have no record of specific dates.

INTERROGATORY NO. 2

State the sources of the names for "Truly Conservative Contributors."

a. If the sources are from secretary of state offices or other offices where election finance reports are filed, list the states and/or localities involved and specify the offices involved (e.g. state board of elections).

b. For each source listed in response to 2a, state the reporting periods covered.

ANSWER

a. I obtained names from the following offices:

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1. Alaska, Lt. Governors Office (by mail)
2. California, Secretary of State
3. Connecticut, Secretary of State
4. Florida, Secretary of State
5. Louisiana, Secretary of State (by mail)
6. New York, Board of Elections
7. Ohio, Secretary of State
8. Texas, Secretary of State

b. I have no record of the periods covered.

INTERROGATORY NO. 3

Describe in detail the procedure whereby you and/or your employees or agents gathered the names of "Truly Conservative Contributors." Your answer should include, but not be limited to, a statement of whether the names were obtained by mail or at the records offices themselves and a statement of how you, your agents, and/or your employees distinguished between contributors to federal and non-federal committees.

ANSWER

The names were obtained in person at each records office with the exception of Alaska and Louisiana which were obtained by mail. I requested only filings for state at local contests at each office.

INTERROGATORY NO. 4

State whether you offered the names which ultimately comprised "Truly Conservative Contributors" to anyone or any entity other than Victor Heyman and the Heyman Consulting Group, Inc.

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a. List the names and addresses of all parties to whom all such offers were made.

ANSWER

The names were not offered to any other person.

INTERROGATORY NO. 5

State all representations concerning the source of the list that you and/or your agents and/or employees made to Victor Heyman, Heyman Consulting Group, Inc., and to anyone else who obtained the names that comprised "Truly Conservative Contributors."

a. State to whom such representations were made, when they were made and by whom they were made.

ANSWER

The names were represented to Meyer Cohen of Working Names, Inc. as coming from records on non-federal elections.

a. I have no record as to when the representation was made.

Thomas E. Mays

THOMAS E. MAYS

Subscribed and sworn to before me this 14th day of March, 1984.

Diane D. Harney

Notary Public

My Commission Expires: ~~My~~ Commission Expires September 30, 1987

83040574817



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 10, 1984

Honorable Marion Ash
Political Reform Division
Office of the Secretary of State
Box 1467, 1230 J Street
Sacramento, California 95814

Dear Ms. Ash:

The Federal Election Commission, established in April 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code. In connection with an investigation being conducted by the Commission, the Commission's Office of General Counsel has attached questions addressing the process by which members of the public may review or receive copies of political campaign finance reports filed with your office.

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

Please submit this information within two weeks of your receipt of this letter. If you have any questions, please direct them to Jonathan Levin, the attorney handling this matter, at 202 523-4000.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Questions

88040574818

Questions to: Honorable Marion Ash
Political Reform Division

Below are questions aimed at discovering how your office sets up files for campaign finance reports received by candidate campaign committees, political party committees, political action committees, or other reporting entities.

1. Do you keep files of reports of state and local election activity, (i.e., contributions and disbursements related to campaigns for local and state offices) separate from your files of reports of federal activities (i.e., contributions and disbursements for U.S. House, U.S. Senate, or President)?

a. Please describe in detail how the federal reports are separated from the state and local reports e.g., by separate folder, separate cabinets, separate rooms.

b. Are there clear markings or other indications on the folders, cabinets, or in the rooms to indicate whether the reports contained therein are state or federal?

2. Do you require reports to be filed on state forms?

a. Do you permit reports to be filed on computerized forms?

b. When reports on federal activity are filed, must these reports be filed on state forms or may the reporting entity submit a copy of the report sent to the Federal Election Commission, the Clerk of the House, or the Secretary of the Senate?

3. When a person comes to review a report, does he or she have to register at a desk and request specific copies or may he or she go to the appropriate file and pull out the report needed?

4. When reports are reviewed by a requestor, does the requestor see the report in the form it was filed or on a computer print-out with the same information?

If computer print-outs are reviewed, do they indicate whether the information on the print-out comes from the state or the federal reports?

5. When a requestor asks for copies of reports that he or she may retain are these copies sold (or given) to the requestor in the form of a copy of the actual report or as a computer print-out?

6. Is there any labeling or other designation on copies of the reports indicating whether they are for state or federal campaign activity?

9 8 0 4 0 5 7 4 8 1 9

Page 2

Questions to: Honorable Marion Ash
Political Reform Division

7. Does your office keep records of the names of persons who review or request reports and what reports they are reviewing or requesting?

8. Does your state have a statute or regulation similar to 2 U.S.C. § 438(a)(4) or 11 C.F.R. § 104.5 (copies enclosed) prohibiting the use of contributors' names for solicitation or for other commercial purposes?

a. If the answer is yes, please enclose a copy of the appropriate statute and/or regulation?

9. Does the National Conservative Political Action Committee (NCPAC) file reports with your office?

a. If the answer is yes, when did NCPAC begin to file reports with your office?

b. Does NCPAC file one report or separate reports for state campaign activity and federal campaign activity?

i. If NCPAC's practice has changed from filing one combined state-federal report to filing separate reports, please state when this practice began.

c. Does NCPAC file on state reporting forms or on computer print-outs containing the required information?

i. If NCPAC has been filing on computer print-outs, please state when it began this practice and whether this practice is for both state and federal reports.

Enclosure

Statute and regulation sections

83040574820

2 U.S.C.

§438. Administrative provisions

(a) *Duties of Commission.* The Commission shall—

(4) within 48 hours after the time of the receipt by the Commission of reports and statements filed with it, make them available for public inspection, and copying, at the expense of the person requesting such copying, except that any information copied from such reports or statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee. A political committee may submit 10 pseudonyms on each report filed in order to protect against the illegal use of names and addresses of contributors, provided such committee attaches a list of such pseudonyms to the appropriate report. The Clerk, Secretary, or the Commission shall exclude these lists from the public record:

11 C.F.R.

§104.15 Sale or use restriction (2 U.S.C. 438(a)(4)).

(a) Any information copied, or otherwise obtained, from any report or statement, or any copy, reproduction, or publication thereof, filed with the Commission, Clerk of the House, Secretary of the Senate, or any Secretary of State or other equivalent State officer, shall not be sold or used by any person for the purpose of soliciting contributions or for any commercial purpose, except that the name and address of any political committee may be used to solicit contributions from such committee.

(b) For purposes of 11 CFR 104.15, "soliciting contributions" includes soliciting any type of contribution or donation, such as political or charitable contributions.

(c) The use of information, which is copied or otherwise obtained from reports filed under 11 CFR Part 104, in newspapers, magazines, books or other similar communications is permissible as long as the principal purpose of such communications is not to communicate any contributor information listed on such reports for the purpose of soliciting contributions or for other commercial purposes.

8 3 0 4 0 5 7 4 8 2 1



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 10, 1984

Honorable John W. Fainter, Jr.
Secretary of State
P.O. Box 12887, Capitol Station
Austin, Texas 78711

Dear Mr. Fainter:

The Federal Election Commission, established in April 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code. In connection with an investigation being conducted by the Commission, the Commission's Office of General Counsel has attached questions addressing the process by which members of the public may review or receive copies of political campaign finance reports filed with your office.

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

Please submit this information within two weeks of your receipt of this letter. If you have any questions, please direct them to Jonathan Levin, the attorney handling this matter, at 202 523-4000.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Questions

83040574822



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 10, 1984

Honorable Stephen McAlpine
Lieutenant Governor
State of Alaska
Juneau, Alaska 99811

Dear Mr. McAlpine:

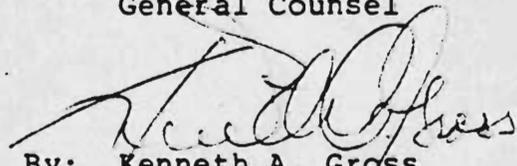
The Federal Election Commission, established in April 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code. In connection with an investigation being conducted by the Commission, the Commission's Office of General Counsel has attached questions addressing the process by which members of the public may review or receive copies of political campaign finance reports filed with your office.

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Please submit this information within two weeks of your receipt of this letter. If you have any questions, please direct them to Jonathan Levin, the attorney handling this matter, at 202 523-4000.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosure
Questions

83040574825



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 10, 1984

Honorable James H. Brown, Jr.
Secretary of State
P.O. Box 44125
Baton Rouge, Louisiana 70804

Dear Mr. Brown:

8 3 0 4 0 6 / 4 8 2 4

The Federal Election Commission, established in April 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code. In connection with an investigation being conducted by the Commission, the Commission's Office of General Counsel has attached questions addressing the process by which members of the public may review or receive copies of political campaign finance reports filed with your office.

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

Please submit this information within two weeks of your receipt of this letter. If you have any questions, please direct them to Jonathan Levin, the attorney handling this matter, at 202 523-4000.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Questions



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 10, 1984

Honorable Thomas W. Wallace
Executive Director
State Board of Elections
99 Washington Avenue
Albany, New York 12210

Dear Mr. Wallace:

9 8 7 6 5 4 3 2 1
The Federal Election Commission, established in April 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code. In connection with an investigation being conducted by the Commission, the Commission's Office of General Counsel has attached questions addressing the process by which members of the public may review or receive copies of political campaign finance reports filed with your office.

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

9 8 7 6 5 4 3 2 1
Please submit this information within two weeks of your receipt of this letter. If you have any questions, please direct them to Jonathan Levin, the attorney handling this matter, at 202 523-4000.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Questions



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 10, 1984

Honorable Sherrod Brown
Secretary of State
30 E. Broad Street
Columbus, Ohio 43216

Dear Mr. Brown:

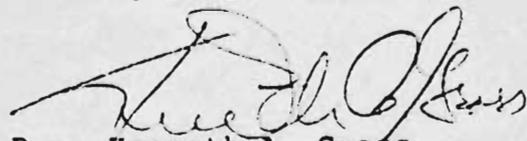
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Please submit this information within two weeks of your receipt of this letter. If you have any questions, please direct them to Jonathan Levin, the attorney handling this matter, at 202 523-4000.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosure
Questions

93040574820



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 10, 1984

Honorable Julie Tashijan
Secretary of State
30 Trinity Street
Hartford, Connecticut 06115

Dear Ms. Tashijan:

The Federal Election Commission, established in April 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code. In connection with an investigation being conducted by the Commission, the Commission's Office of General Counsel has attached questions addressing the process by which members of the public may review or receive copies of political campaign finance reports filed with your office.

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

Please submit this information within two weeks of your receipt of this letter. If you have any questions, please direct them to Jonathan Levin, the attorney handling this matter, at 202 523-4000.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Questions

83040574827



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 10, 1984

R.J. Bevis
Bureau Chief, Election Records
Room 1801, The Capitol
Tallahassee, Florida 32301

Dear Mr. Bevis:

The Federal Election Commission, established in April 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code. In connection with an investigation being conducted by the Commission, the Commission's Office of General Counsel has attached questions addressing the process by which members of the public may review or receive copies of political campaign finance reports filed with your office.

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

Please submit this information within two weeks of your receipt of this letter. If you have any questions, please direct them to Jonathan Levin, the attorney handling this matter, at 202 523-4000.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Questions

8 9 0 4 0 5 7 4 8 2 8

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

84 MAY 10 P 2: 42

In the Matter of)	
)	
Working Names)	
Meyer T. Cohen)	MUR 1542
Thomas L. Mays)	
Victor Heyman)	
Heyman Consulting Group, Inc.)	
Preferred Lists)	

SENSITIVE

COMPREHENSIVE INVESTIGATIVE REPORT # 1

This matter involves two complaints received from the National Conservative Political Action Committee ("NCPAC") stating that the American Printing House for the Blind and the Republican National Committee ("RNC") had sent fundraising letters to one of the pseudonyms filed with the Commission and that violations of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15 had occurred. The first complaint alleged that Working Names, Inc., acting as a list broker, rented the list to the Printing House. The second complaint alleged that the RNC received its mailing list from Preferred Lists and that Working Names provided Preferred Lists with the list.

While the Commission found no reason to believe that the Printing House or the RNC violated 2 U.S.C. § 438(a)(4) or 11 C.F.R. § 104.15, it did find that Preferred Lists and Working Names violated those sections of the Act and Regulations.

As the investigation proceeded, this Office learned that the list owners were Victor Heyman and the Heyman Consulting Group, Inc. ("Heyman Consulting") of Rockville, Maryland and Thomas L. Mays of Washington, D.C. Mr. Mays obtained the names themselves

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and Heyman Consulting performed computer processing of the materials. The Commission, upon the recommendation of this Office, found reason to believe that Heyman Consulting, Mr. Heyman, and Mr. Mays violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. Upon this Office's recommendation, the Commission also extended the investigation to the president of Working Names, Meyer Cohen, and found reason to believe that he violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. These findings were made on February 7, 1984.

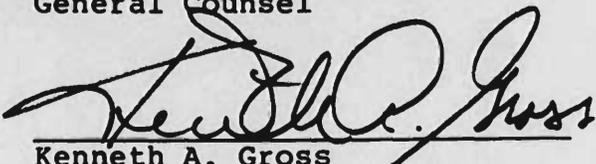
8 3 0 4 0 5 7 4 8 5 0
In response to the reason to believe finding, counsel for the respondents asserted that the appearance of the pseudonym in the mailings involved was due to an incorrect filing of a NCPAC list as a state report, rather than a federal report, in an office of a Secretary of State. In response to interrogatories, Mr. Heyman stated that Mr. Mays provided the Heyman Consulting Group with the names it used to produce the list involved in the mailings. He further stated that Mr. Mays had told him the names were obtained from the records maintained by "State Secretaries of State" concerning non-federal elections. As part of his response, Mr. Mays submitted a list of the eight Secretaries of State offices where he obtained names for the list of names involved in this matter. Mr. Mays asserted that he requested only filings for state and local contests. This Office has mailed questions to the eight offices in order to ascertain whether or not the obtaining of the pseudonym by Mr. Mays was

inadvertant. These questions are directed at discovering how the offices are set up and what effort is made to separate reports of federal activity from reports of state activity. This information may be particularly useful during the drafting of a conciliation proposal and during conciliation negotiations.

Upon receipt of the responses from the Secretaries of State, this Office will prepare briefs with appropriate recommendations.

Charles N. Steele
General Counsel

By:


Kenneth A. Gross
Associate General Counsel

Date

May 10, 1934

8 9 0 4 0 6 7 9 8 3 1



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

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

DATE: MAY 14, 1984

SUBJECT: MUR 1542 - Comprehensive Investigative
Report #1 signed May 10, 1984

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 2:00, May 11, 1984.

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

89040674832

RECEIVED AT THE FEC
GCC# 3372
84 MAY 30 11:28



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 10, 1984

*MUR 1542
Levin*

Honorable Sherrod Brown
Secretary of State
30 E. Broad Street
Columbus, Ohio 43216

3
A12.21

Dear Mr. Brown:

The Federal Election Commission, established in April 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code. In connection with an investigation being conducted by the Commission, the Commission's Office of General Counsel has attached questions addressing the process by which members of the public may review or receive copies of political campaign finance reports filed with your office.

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

Please submit this information within two weeks of your receipt of this letter. If you have any questions, please direct them to Jonathan Levin, the attorney handling this matter, at 202 523-4000.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

RECEIVED
MAY 17 1984
SHERROD BROWN
SECRETARY OF STATE

Enclosure
Questions

33040574830

Questions to: Honorable Sherrod Brown
Secretary of State

APR 21 12:21

Below are questions aimed at discovering how your office sets up files for campaign finance reports received by candidate campaign committees, political party committees, political action committees, or other reporting entities.

83040574834

1. Do you keep files of reports of state and local election activity, (i.e., contributions and disbursements related to campaigns for local and state offices) separate from your files of reports of federal activities (i.e., contributions and disbursements for U.S. House, U.S. Senate, or President)? *yes*

a. Please describe in detail how the federal reports are separated from the state and local reports e.g., by separate folder, separate cabinets, separate rooms.

b. Are there clear markings or other indications on the folders, cabinets, or in the rooms to indicate whether the reports contained therein are state or federal? *yes*

2. Do you require reports to be filed on state forms? *yes*

a. Do you permit reports to be filed on computerized forms? *yes*

b. When reports on federal activity are filed, must these reports be filed on state forms or may the reporting entity submit a copy of the report sent to the Federal Election Commission, the Clerk of the House, or the Secretary of the Senate? *yes, for federal candidates only*

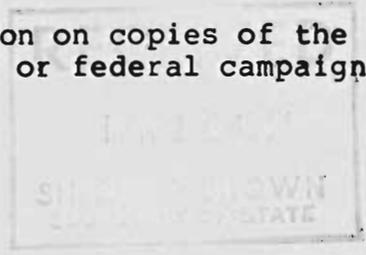
3. When a person comes to review a report, does he or she have to register at a desk and request specific copies or may he or she go to the appropriate file and pull out the report needed?

4. When reports are reviewed by a requestor, does the requestor see the report in the form it was filed or on a computer print-out with the same information?

If computer print-outs are reviewed, do they indicate whether the information on the print-out comes from the state or the federal reports?

5. When a requestor asks for copies of reports that he or she may retain are these copies sold (or given) to the requestor in the form of a copy of the actual report or as a computer print-out?

6. Is there any labeling or other designation on copies of the reports indicating whether they are for state or federal campaign activity? *Not on state forms*



Questions to: Honorable Sherrod Brown
Secretary of State

7. Does your office keep records of the names of persons who review or request reports and what reports they are reviewing or requesting? *yes*

8. Does your state have a statute or regulation similar to 2 U.S.C. § 438(a)(4) or 11 C.F.R. § 104.5 (copies enclosed) prohibiting the use of contributors' names for solicitation or for other commercial purposes? *No*

a. If the answer is yes, please enclose a copy of the appropriate statute and/or regulation?

9. Does the National Conservative Political Action Committee (NCPAC) file reports with your office? *Not to date*

a. If the answer is yes, when did NCPAC begin to file reports with your office?

b. Does NCPAC file one report or separate reports for state campaign activity and federal campaign activity? *One report would suffice*

i. If NCPAC's practice has changed from filing one combined state-federal report to filing separate reports, please state when this practice began.

c. Does NCPAC file on state reporting forms or on computer print-outs containing the required information? *Either would suffice*

i. If NCPAC has been filing on computer print-outs, please state when it began this practice and whether this practice is for both state and federal reports.

Enclosure

Statute and regulation sections

83040674835

2 U.S.C.

§438. Administrative provisions

(a) *Duties of Commission.* The Commission shall—

(4) within 48 hours after the time of the receipt by the Commission of reports and statements filed with it, make them available for public inspection, and copying, at the expense of the person requesting such copying, except that any information copied from such reports or statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee. A political committee may submit 10 pseudonyms on each report filed in order to protect against the illegal use of names and addresses of contributors, provided such committee attaches a list of such pseudonyms to the appropriate report. The Clerk, Secretary, or the Commission shall exclude these lists from the public record;

11 C.F.R.

§ 104.15 Sale or use restriction (2 U.S.C. 438(a)(4)).

(a) Any information copied, or otherwise obtained, from any report or statement, or any copy, reproduction, or publication thereof, filed with the Commission, Clerk of the House, Secretary of the Senate, or any Secretary of State or other equivalent State officer, shall not be sold or used by any person for the purpose of soliciting contributions or for any commercial purpose, except that the name and address of any political committee may be used to solicit contributions from such committee.

(b) For purposes of 11 CFR 104.15, "soliciting contributions" includes soliciting any type of contribution or donation, such as political or charitable contributions.

(c) The use of information, which is copied or otherwise obtained from reports filed under 11 CFR Part 104, in newspapers, magazines, books or other similar communications is permissible as long as the principal purpose of such communications is not to communicate any contributor information listed on such reports for the purpose of soliciting contributions or for other commercial purposes.

33040579836



RECEIVED AT THE FEC
Ccut# 3275

84 MAY 24 10:54

FLORIDA DEPARTMENT OF STATE
George Firestone
Secretary of State

Dorothy W. Glisson
Deputy Secretary For Elections

*down
mar 1542*

21 P10:31

May 18, 1984

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

Dear Mr. Steele:

Enclosed is the completed questionnaire submitted by your office.

Please address any future correspondence to Dorothy W. Glisson, Deputy Secretary for Elections, 1801 Capitol Bldg., Tallahassee, Florida 32301.

If we may be of further assistance to you at any time, please feel free to contact us.

Sincerely,

Dorothy W. Glisson
Dorothy W. Glisson
Deputy Secretary for Elections

DWG/ce

Enclosure

FLORIDA-State of the Arts

DIVISION OF ELECTIONS, Room 1801, The Capitol, Tallahassee, Florida 32301
(904) 488-7690

83040579837



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
MAY 14 11 34 AM '84
FEDERAL ELECTION COMMISSION
TALLAHASSEE, FLORIDA

May 10, 1984

R.J. Bevis
Bureau Chief, Election Records
Room 1801, The Capitol
Tallahassee, Florida 32301

Dear Mr. Bevis:

The Federal Election Commission, established in April 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code. In connection with an investigation being conducted by the Commission, the Commission's Office of General Counsel has attached questions addressing the process by which members of the public may review or receive copies of political campaign finance reports filed with your office.

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

Please submit this information within two weeks of your receipt of this letter. If you have any questions, please direct them to Jonathan Levin, the attorney handling this matter, at 202 523-4000.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Questions

83040574833

Questions to: R.J. Bevis
Bureau Chief, Election Records

Below are questions aimed at discovering how your office sets up files for campaign finance reports received by candidate campaign committees, political party committees, political action committees, or other reporting entities.

1. Do you keep files of reports of state and local election activity, (i.e., contributions and disbursements related to campaigns for local and state offices) separate from your files of reports of federal activities (i.e., contributions and disbursements for U.S. House, U.S. Senate, or President)?

a. Please describe in detail how the federal reports are separated from the state and local reports e.g., by separate folder, separate cabinets, separate rooms.

b. Are there clear markings or other indications on the folders, cabinets, or in the rooms to indicate whether the reports contained therein are state or federal?

*no -
noted on
list*

2. Do you require reports to be filed on state forms?

not Federal

a. Do you permit reports to be filed on computerized forms?

b. When reports on federal activity are filed, must these reports be filed on state forms or may the reporting entity submit a copy of the report sent to the Federal Election Commission, the Clerk of the House, or the Secretary of the Senate?

*yes,
with
cover
pages*

3. When a person comes to review a report, does he or she have to register at a desk and request specific copies or may he or she go to the appropriate file and pull out the report needed?

no

4. When reports are reviewed by a requestor, does the requestor see the report in the form it was filed or on a computer print-out with the same information?

*form
filed*

If computer print-outs are reviewed, do they indicate whether the information on the print-out comes from the state or the federal reports?

5. When a requestor asks for copies of reports that he or she may retain are these copies sold (or given) to the requestor in the form of a copy of the actual report or as a computer print-out?

*10 &
per
copy*

6. Is there any labeling or other designation on copies of the reports indicating whether they are for state or federal campaign activity?

no

83040574839

Questions to: R.J. Bevis
Bureau Chief, Election Records

7. Does your office keep records of the names of persons who review or request reports and what reports they are reviewing or requesting? *no*

8. Does your state have a statute or regulation similar to 2 U.S.C. § 438(a)(4) or 11 C.F.R. § 104.5 (copies enclosed) prohibiting the use of contributors' names for solicitation or for other commercial purposes? *no*

a. If the answer is yes, please enclose a copy of the appropriate statute and/or regulation?

9. Does the National Conservative Political Action Committee (NCPAC) file reports with your office? *yes 1976-1982*

a. If the answer is yes, when did NCPAC begin to file reports with your office? *1976*

b. Does NCPAC file one report or separate reports for state campaign activity and federal campaign activity? *one report*

i. If NCPAC's practice has changed from filing one combined state-federal report to filing separate reports, please state when this practice began.

c. Does NCPAC file on state reporting forms or on computer print-outs containing the required information? *computer print-outs*

i. If NCPAC has been filing on computer print-outs, please state when it began this practice and whether this practice is for both state and federal reports. *1976 both*

Enclosure
Statute and regulation sections

83040579840

2 U.S.C.

§438. Administrative provisions

(a) *Duties of Commission.* The Commission shall—

(4) within 48 hours after the time of the receipt by the Commission of reports and statements filed with it, make them available for public inspection, and copying, at the expense of the person requesting such copying, except that any information copied from such reports or statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee. A political committee may submit 10 pseudonyms on each report filed in order to protect against the illegal use of names and addresses of contributors, provided such committee attaches a list of such pseudonyms to the appropriate report. The Clerk, Secretary, or the Commission shall exclude these lists from the public record;

11 C.F.R.

§104.15 Sale or use restriction (2 U.S.C. 438(a)(4)).

(a) Any information copied, or otherwise obtained, from any report or statement, or any copy, reproduction, or publication thereof, filed with the Commission, Clerk of the House, Secretary of the Senate, or any Secretary of State or other equivalent State officer, shall not be sold or used by any person for the purpose of soliciting contributions or for any commercial purpose, except that the name and address of any political committee may be used to solicit contributions from such committee.

(b) For purposes of 11 CFR 104.15, "soliciting contributions" includes soliciting any type of contribution or donation, such as political or charitable contributions.

(c) The use of information, which is copied or otherwise obtained from reports filed under 11 CFR Part 104, in newspapers, magazines, books or other similar communications is permissible as long as the principal purpose of such communications is not to communicate any contributor information listed on such reports for the purpose of soliciting contributions or for other commercial purposes.

83040574841



STATE OF ALASKA

POUCH AA
JUNEAU 99811
(907) 485-3520

May 21, 1984

600 # 3322
RECEIVED AT THE FEC
STEPHEN McALPINE
LIEUTENANT GOVERNOR
84 MAY 29 09:11

MAY 29 9:10:12

MUK 1542
Lewin

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

Dear Mr. Gross:

In answer to your questions contained in your letter of May 10, 1984:

1. The Lieutenant Governor's office maintains files, reports, etc. on federal campaigns only. All state campaign reports, etc. are filed with the Alaska Public Office Commission, 610 C Street, Suite 211, Anchorage, Alaska 99501, so there is no need for us to maintain seperate recordkeeping systems.
2. We do not require that reports be made on state forms for our purposes. (APOC however does require that state forms be used.) We allow copies of the reports sent to the Federal Election Commission to be filed in our office.
3. When a person comes into our office to review a report, they are directed to the person who has control over the reports themselves. They must first request a report, then they are allowed to review the report within a certain area of the office where they can be observed by the person in control of the files.
4. The requestor sees the report in the form it was filed; we are not computerized for this area. The F.E.C. administratively instructs filers who contribute to Federal candidates in a state to send the Summary Page, Detailed Summary Page, and any Schedule B pages showing contributions to candidate(s) to the proper states. Some of the filers send the complete report just to cover the bases, and some less than is necessary. We are only required to file and maintain those documents which reflect a transaction in our state.

3004001

RECEIVED AT THE FEC
60# 3355
84 MAY 29 12:17



JAMES H. "JIM" BROWN
SECRETARY OF STATE

STATE OF LOUISIANA
SECRETARY OF STATE
P.O. BOX 44126
BATON ROUGE, LA. 70804-4126
(504) 342-6710

May 22, 1984

*MUR 1542
Levin*

29
A4:55

Mr. Charles N. Steele
General Counsel
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Steele:

In reference to your letter and questionnaire of May 10th, the enclosed is for your information. The order of the following will correspond with the questions submitted in your letter.

- 1) In Louisiana, state and local candidate and committee records are kept by a separate office from the Secretary of State, called the Campaign Finance Office. The Secretary of State Office only records Federal reports, and they are kept in a file cabinet separately from other office correspondence.
- 2) Reports received by this office are xerox copies of reports filed with the Federal Election Commission which is acceptable.
- 3) Individuals requesting copies or access to files are asked what specific information they need. The file or report is then pulled and the person is allowed to review the records.
- 4) A person reviewing reports or files may review the original copy that has been filed in our office.
- 5) If the request is for a personal copy of the report, we xerox the report and charge a fee of 10¢ per page.
- 6) N/A
- 7) Yes
- 8) No
- 9) No

If I can be of any further assistance at any time, please do not hesitate to contact me.

Sincerely,
Barrell L. Cobb
Barrell L. Cobb
State Elections Director

8 9 0 4 0 6 7 4 8 4 3 |



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 10, 1984

Honorable James H. Brown, Jr.
Secretary of State
P.O. Box 44125
Baton Rouge, Louisiana 70804

Dear Mr. Brown:

The Federal Election Commission, established in April 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code. In connection with an investigation being conducted by the Commission, the Commission's Office of General Counsel has attached questions addressing the process by which members of the public may review or receive copies of political campaign finance reports filed with your office.

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

Please submit this information within two weeks of your receipt of this letter. If you have any questions, please direct them to Jonathan Levin, the attorney handling this matter, at 202 523-4000.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosure
Questions

33040574844

Questions to: Honorable James H. Brown, Jr.
Secretary of State

Below are questions aimed at discovering how your office sets up files for campaign finance reports received by candidate campaign committees, political party committees, political action committees, or other reporting entities.

- 8 3 0 4 0 5 7 4 8 . 4 5
1. Do you keep files of reports of state and local election activity, (i.e., contributions and disbursements related to campaigns for local and state offices) separate from your files of reports of federal activities (i.e., contributions and disbursements for U.S. House, U.S. Senate, or President)?
 - a. Please describe in detail how the federal reports are separated from the state and local reports e.g., by separate folder, separate cabinets, separate rooms.
 - b. Are there clear markings or other indications on the folders, cabinets, or in the rooms to indicate whether the reports contained therein are state or federal?
 2. Do you require reports to be filed on state forms?
 - a. Do you permit reports to be filed on computerized forms?
 - b. When reports on federal activity are filed, must these reports be filed on state forms or may the reporting entity submit a copy of the report sent to the Federal Election Commission, the Clerk of the House, or the Secretary of the Senate?
 3. When a person comes to review a report, does he or she have to register at a desk and request specific copies or may he or she go to the appropriate file and pull out the report needed?
 4. When reports are reviewed by a requestor, does the requestor see the report in the form it was filed or on a computer print-out with the same information?

If computer print-outs are reviewed, do they indicate whether the information on the print-out comes from the state or the federal reports?
 5. When a requestor asks for copies of reports that he or she may retain are these copies sold (or given) to the requestor in the form of a copy of the actual report or as a computer print-out?
 6. Is there any labeling or other designation on copies of the reports indicating whether they are for state or federal campaign activity?

Page 2

Questions to: Honorable James H. Brown, Jr.
Secretary of State

7. Does your office keep records of the names of persons who review or request reports and what reports they are reviewing or requesting?

8. Does your state have a statute or regulation similar to 2 U.S.C. § 438(a)(4) or 11 C.F.R. § 104.5 (copies enclosed) prohibiting the use of contributors' names for solicitation or for other commercial purposes?

a. If the answer is yes, please enclose a copy of the appropriate statute and/or regulation?

9. Does the National Conservative Political Action Committee (NCPAC) file reports with your office?

a. If the answer is yes, when did NCPAC begin to file reports with your office?

b. Does NCPAC file one report or separate reports for state campaign activity and federal campaign activity?

i. If NCPAC's practice has changed from filing one combined state-federal report to filing separate reports, please state when this practice began.

c. Does NCPAC file on state reporting forms or on computer print-outs containing the required information?

i. If NCPAC has been filing on computer print-outs, please state when it began this practice and whether this practice is for both state and federal reports.

Enclosure

Statute and regulation sections

33040674840

666 3444 RECEIVED AT THE FEC

GEORGE D. SALERNO
Chairman
R. WELLS STOUT
Vice Chairman
DONALD A. RETTALIATA
Commissioner
THOMAS J. SULLIVAN
Commissioner



84 JUN 4
THOMAS W. WALLACE
Executive Director
GEORGE V. PALMER
Asst. Executive Director
DONALD J. MCCARTHY, JR.
Counsel-Enforcement
THOMAS P. ZOLEZZI
Special Counsel

JUN 4 11:01 STATE OF NEW YORK
STATE BOARD OF ELECTIONS

P.O. BOX 4
ONE COMMERCE PLAZA
ALBANY, NY 12260

MUR 1542
Levin

May 30, 1984

Mr. Kenneth A. Gross - Associate General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Dear Mr. Gross;

In response to your letter dated May 10, 1984, the answers to all of your questions are as follows:

1. Yes. Our report files for all state election activity are kept separately from our report files for federal activity. Our County Boards of Election handle all local election activity.
 - A) All state and federal files are kept in the same room, but they are filed in separate folders within separate cabinets. Each candidate (state & federal) has its own folder. Each state PAC has its own folder. However federal PAC's are filed alphabetically by folder (i.e. all A's are in "A" folder, all B's are in "B" folder, etc.).
 - B) Candidate folders are labeled by name and district (e.g. - AD - Assembly, SD - Senate, JD - Judicial, CD - Congressional). Major candidates are labeled by name and office (e.g. - President, US Sen, Gov, Lt. Gov., Att. Gen, Compt.). State PAC's have the name of the PAC on the tab of the folder and federal PAC folders are labeled alphabetically (i.e. A,B,C, etc.). Cabinets are labeled by description of contents.
2. Yes. We require all committees and candidates to file on state forms.
 - A) No. Reports must be filed on our forms.
 - B) Reporting entities are required to submit a copy of the report sent to the Federal Election Commission (FEC) regarding disclosure of federal activities.
3. When an individual comes to review a report, he or she must fill out a form entitled, Request for Access to Public Records. Once the form is completed, the file is pulled and given to the requestor. This individual may review the reports at the tables in the Public Viewing Area or they may request copies at a cost of 10 cents per page.

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4. The requestor observes the report in the form it was filed.
5. They are sold to the requestor in the form of a copy of the actual report.
6. As stated in our response to question 2B, copies of FEC reports are sent to us regarding federal activity, whereas all state election activity must be on state forms.
7. Yes. Our office does keep records of the names of persons who review or request reports, and what reports they are reviewing or requesting.
8. Election campaign finance reports are made public records by Sec. 14-108(3) and Sec. 14-108(4) of the Election Law. They are expressly made available for public inspection.

Where a record is made available solely by virtue of Sec. 89 of the Public Officer's Law, its use for commercial purposes may be limited by Sec. 88 (3)(d).

However, election finance reports are available independently of the Freedom of Information Law (i.e. Sec 89 of the Public Officers Law) and they may not be restricted in view of Sec. 89 (6) of the Public Officers Law, which reads: "Nothing in this article shall be construed to limit or abridge any otherwise available right of access at law or in equity of any party to records".

9. Yes. The National Conservative Political Action Committee (NCPAC) has filed reports with our office.
 - A) The NCPAC began filing reports with our office during March 1982. The last filing we received from the NCPAC was for March 1983.
 - B) The NCPAC filed copies of reports sent to the FEC with us for its federal campaign activity. The NCPAC has never registered with the State Board of Elections or submitted any filings regarding its state campaign activity.
 - C) As stated in 9B) above, the NCPAC files copies of reports sent to the FEC with us. These reports are on FEC forms.

A copy of your letter has been enclosed for your convenience. If you have any questions don't hesitate to contact us at (518) 474-8200.

Sincerely,



FRANK D. POLSINELLO
Chief
Bureau of Election
Law Enforcement

89040574848



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 10, 1984

Honorable Thomas W. Wallace
Executive Director
State Board of Elections
99 Washington Avenue
Albany, New York 12210



Dear Mr. Wallace:

The Federal Election Commission, established in April 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code. In connection with an investigation being conducted by the Commission, the Commission's Office of General Counsel has attached questions addressing the process by which members of the public may review or receive copies of political campaign finance reports filed with your office.

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

Please submit this information within two weeks of your receipt of this letter. If you have any questions, please direct them to Jonathan Levin, the attorney handling this matter, at 202 523-4000.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Questions

8 3 0 4 0 5 7 4 8 4 9

Questions to: Honorable Thomas W. Wallace
Executive Director

Below are questions aimed at discovering how your office sets up files for campaign finance reports received by candidate campaign committees, political party committees, political action committees, or other reporting entities.

1. Do you keep files of reports of state and local election activity, (i.e., contributions and disbursements related to campaigns for local and state offices) separate from your files of reports of federal activities (i.e., contributions and disbursements for U.S. House, U.S. Senate, or President)?
 - a. Please describe in detail how the federal reports are separated from the state and local reports e.g., by separate folder, separate cabinets, separate rooms.
 - b. Are there clear markings or other indications on the folders, cabinets, or in the rooms to indicate whether the reports contained therein are state or federal?
2. Do you require reports to be filed on state forms?
 - a. Do you permit reports to be filed on computerized forms?
 - b. When reports on federal activity are filed, must these reports be filed on state forms or may the reporting entity submit a copy of the report sent to the Federal Election Commission, the Clerk of the House, or the Secretary of the Senate?
3. When a person comes to review a report, does he or she have to register at a desk and request specific copies or may he or she go to the appropriate file and pull out the report needed?
4. When reports are reviewed by a requestor, does the requestor see the report in the form it was filed or on a computer print-out with the same information?

If computer print-outs are reviewed, do they indicate whether the information on the print-out comes from the state or the federal reports?
5. When a requestor asks for copies of reports that he or she may retain are these copies sold (or given) to the requestor in the form of a copy of the actual report or as a computer print-out?
6. Is there any labeling or other designation on copies of the reports indicating whether they are for state or federal campaign activity?

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Page 2

Questions to: Honorable Thomas W. Wallace
Executive Director

7. Does your office keep records of the names of persons who review or request reports and what reports they are reviewing or requesting?

8. Does your state have a statute or regulation similar to 2 U.S.C. § 438(a)(4) or 11 C.F.R. § 104.5 (copies enclosed) prohibiting the use of contributors' names for solicitation or for other commercial purposes?

a. If the answer is yes, please enclose a copy of the appropriate statute and/or regulation?

9. Does the National Conservative Political Action Committee (NCPAC) file reports with your office?

a. If the answer is yes, when did NCPAC begin to file reports with your office?

b. Does NCPAC file one report or separate reports for state campaign activity and federal campaign activity?

i. If NCPAC's practice has changed from filing one combined state-federal report to filing separate reports, please state when this practice began.

c. Does NCPAC file on state reporting forms or on computer print-outs containing the required information?

i. If NCPAC has been filing on computer print-outs, please state when it began this practice and whether this practice is for both state and federal reports.

Enclosure

Statute and regulation sections

83040574851

2 U.S.C.

§438. Administrative provisions

(a) *Duties of Commission.* The Commission shall—

(4) within 48 hours after the time of the receipt by the Commission of reports and statements filed with it, make them available for public inspection, and copying, at the expense of the person requesting such copying, except that any information copied from such reports or statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee. A political committee may submit 10 pseudonyms on each report filed in order to protect against the illegal use of names and addresses of contributors, provided such committee attaches a list of such pseudonyms to the appropriate report. The Clerk, Secretary, or the Commission shall exclude these lists from the public record:

11 C.F.R.

§ 104.15 Sale or use restriction (2 U.S.C. 438(a)(4)).

(a) Any information copied, or otherwise obtained, from any report or statement, or any copy, reproduction, or publication thereof, filed with the Commission, Clerk of the House, Secretary of the Senate, or any Secretary of State or other equivalent State officer, shall not be sold or used by any person for the purpose of soliciting contributions or for any commercial purpose, except that the name and address of any political committee may be used to solicit contributions from such committee.

(b) For purposes of 11 CFR 104.15, "soliciting contributions" includes soliciting any type of contribution or donation, such as political or charitable contributions.

(c) The use of information, which is copied or otherwise obtained from reports filed under 11 CFR Part 104, in newspapers, magazines, books or other similar communications is permissible as long as the principal purpose of such communications is not to communicate any contributor information listed on such reports for the purpose of soliciting contributions or for other commercial purposes.

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expenditure. Any statement reporting a loan shall have attached to it a copy of the evidence of indebtedness. Expenditures in sums under fifty dollars need not be specifically accounted for by separate items in said statements, and receipts and contributions aggregating not more than ninety-nine dollars, from any one contributor need not be specifically accounted for by separate items in said statements, provided however, that such expenditures, receipts and contributions shall be subject to the other provisions of section 14-118 of this article.

2. *Notwithstanding the provisions of subdivision one hereof, if the expenditures made and liabilities incurred in any calendar year by any political committee for the purpose of aiding or promoting the success or defeat of one or more ballot proposals are less than five thousand dollars and less than fifty percent of all the expenditures made and liabilities incurred by such committee in such year, then such committee shall be required to report only those contributions which are made to such committee exclusively for the purpose of aiding or promoting the success or defeat of such proposal or proposals, but such committee shall be required to report all expenditures made and liabilities incurred for such purposes. Nothing contained in this subdivision shall be construed to relieve any political committee aiding or promoting the success or defeat of a candidate from any of the reporting requirements imposed by this article.*

[2.]3. The state board of elections shall promulgate regulations with respect to the accounting methods to be applied in preparing the statements required by the provisions of this article and shall provide forms suitable for such statements.

[Amended by chaps. 8 and 9, Laws of 1978. Old subd. 2 renumbered to be subd. 3 and new subd. 2 added by chap. 70, Laws of 1983.]

§ 14-104. Statements of campaign receipts, contributions, transfers and expenditures by and to candidates. Any candidate for election to public office, or for nomination for public office at a contested primary election or convention, or for election to a party position at a primary election, shall file statements sworn, or subscribed and bearing a form notice that false statements made therein are punishable as a class A misdemeanor pursuant to section 210.45 of the penal law, at the times prescribed by this article setting forth the particulars specified by section fourteen-one hundred two, as to all moneys or other valuable things, paid, given, expended or promised by him to aid his own nomination or election, or to promote the success or defeat of a political party, or to aid or influence the nomination or election or the defeat of any other candidate to be voted for at the election or primary election or at a convention, including contributions to political committees, officers, members or agents thereof, and transfers, receipts and contributions to him to be used for any of the purposes above specified, or in lieu thereof, any such candidate may file such a sworn statement at the first filing period, on a form prescribed by the state board of elections that such candidate has made no such expenditures and does not intend to make any such expenditures, except through a political committee authorized by such candidate pursuant to this article. A committee authorized by such a candidate may fulfill all of the filing requirements of this act on behalf of such candidate.

[Matter in italics is new; matter in brackets [] is old law to be omitted.]

§ 14-106. Political advertisements and literature. The statements required to be filed under the provisions of this article next succeeding a primary, general or special election shall be accompanied by a facsimile or copy of all advertisements, pamphlets, circulars, flyers, brochures, letterheads and other printed matter purchased or produced and a schedule of all radio or television time, and scripts used therein, purchased in connection with such election by or under the authority of the person filing the statement or the committee or the person on whose behalf it is filed, as the case may be. Such facsimiles, copies, schedules and scripts shall be preserved by the officer with whom or the board with which it is required to be filed for a period of one year from the date of filing thereof.

[Amended by chap. 8, Laws of 1978.]

§ 14-108. Time for filing statements. 1. The statements required by this article shall be filed at such times as the state board of elections, by rule or regulation, shall specify; provided, however, that in no event shall the board provide for fewer than three filings in the aggregate in connection with any primary, general or special election, or in connection with a question to be voted on and two of said filings shall be before any such election, including one such filing not less than thirty days nor more than forty-five days prior to such election and one such filing not less than eleven days nor more than fifteen days prior to such election. *In addition, the board shall provide that every political committee which has filed a statement of treasurer and depository shall make at least one filing every six months between the time such statement of treasurer and depository is filed and the time such committee goes out of business.* If any candidate or committee shall be required by the provisions of this section, or by rule or regulation hereunder, to effect two filings within a period of five days, the state board of elections may, by rule or regulation, waive the requirement of filing the earlier of such statements. If a statement filed by a candidate or committee after the election to which it pertains is not a final statement showing satisfaction of all liabilities and disposition of all assets, such candidate or committee shall file such additional statements as the board shall, by rule or regulation provide until such a final statement is filed.

[Subd. 1 amended by chap. 955, Laws of 1983; takes effect October 7, 1983.]

2. Each statement shall cover the period up to and including the fourth day next preceding the day specified for the filing thereof; provided, however, that any contribution in excess of one thousand dollars, if received after the close of the period to be covered in the last statement filed before any primary, general or special election but before such election, shall be reported, in the same manner as other contributions, within twenty-four hours after receipt.

3. Each statement shall be preserved by the officer with whom or the board with which it is required to be filed for a period of five years from the date of filing thereof.

4. Each statement shall constitute a part of the public records of such officer or board and shall be open to public inspection.

5. The state board of elections or other board of elections, as the case may be, shall notify each person required to file statements in accordance with this article of such person's failure to timely file. Such notice

[Matter in italics is new.]

Freedom of Information Law does not make all records of government generally available but, rather, provides that only certain enumerated categories are available. Sheehan v Binghamton (1977) 59 AD2d 808, 398 NYS2d 905.

Since all documents are not presumptively available for public inspection and copying under the Freedom of Information Law, in order for public access to be mandatory the requested document must be included in one of the nine enumerated categories in the Law. Sheehan v Binghamton (1977) 59 AD2d 808, 398 NYS2d 905.

Requested document or "complaint" of CB radio theft was a field officer's report and, as such, might well include hearsay, reports and names of confidential informants, suspicions or rumors; and since no reasonable definition of "police blotter," as enumerated in the Freedom of Information Law, would call for the inclusion of such information thereon, the requested document was not subject to disclosure under the Law, and its availability should have been denied. Sheehan v Binghamton (1977) 59 AD2d 808, 398 NYS2d 905.

Town Clerk's Records—Tape recorders—custody and control. 1. A tape recorder may be obtained by the town board to be used by the town clerk to record the proceedings at town board meetings so that minutes may be prepared therefrom but if a recorder is obtained the town clerk would be responsible for maintaining the tapes. 2. The tapes may not be maintained by any official other than the town clerk or his deputy. 3. It would be improper for the tapes to be sealed and to be opened only at town board meetings. 4. The town board may authorize other town officers to use the tape recorder and may direct who will have custody of the instrument. 1977 Op Atty Gen Nov 17.

Where malfeasance of a public officer is an issue, and the necessary confidentiality of criminal investigation will not be impaired thereby or national security threatened, maximum freedom of information must be provided whether the proceeding is criminal or civil. Montes v State (1978) 94 Misc 972, 406 NYS2d 664.

In actions against the State for false arrest and false imprisonment, based upon the alleged acts of a parole officer who was responsible for the arrests, those portions of his personnel records that concern complaints and incidents which may have occurred during his employment are not exempt from disclosure under the provision of the Freedom of Information Law (Public Officers Law, art 6) which exempts, as an unwarranted invasion of personal privacy, disclosure of employment, medical or credit histories or personal references of applicants for employment. Montes v State (1978) 94 Misc 2d 972, 406 NYS2d 664.

In actions against the State for false arrest and false imprisonment, based upon the alleged acts of a parole officer who was responsible for the arrests, his personnel records, except as to any

investigation, are subject to examination by the claimants, pursuant to the Freedom of Information Law which became effective January 1, 1977 (Public Officers Law, art 6, as added by L 1977, ch 933), and which permits access to all governmental records other than those specifically exempted. Montes v State (1978) 94 Misc 2d 972, 406 NYS2d 664.

A memorandum by the Budget Director of Oneida County to the Interim County Executive regarding the projected condition of the county general fund at the end of the year, which is not a statistical or factual tabulation within the meaning of the Freedom of Information Law (Public Officers Law, art 6), the Oneida County Freedom of Information Regulations, article 12 of the County Law, or § NYCRR 145.1 (a) (2), but rather contains opinions, policy options or recommendations, is not subject to public inspection. Bartlett v Nassar (1979) 100 Misc 2d 904, 420 NYS2d 265.

Defendants' request for disclosure and inspection of statistical data relating to the arrest and prosecution of persons for prostitution-related offenses, for the purpose of establishing their claim that the law under which they are charged (Penal Law, art 230) is unconstitutionally enforced by the District Attorney and city police, who allegedly routinely enforce section 230.00 of the Penal Law against female prostitutes while they do not enforce section 230.03 against their male patrons, is denied since it does not fit under the categories of discoverable material described in CPL 240.20 and 240.40, is not discoverable on the authority of Brady v Maryland (373 US '83), as it does not address the guilt or innocence of the defendants, and, moreover, the claim of discriminatory enforcement should not be treated as a defense to the criminal charge, but as an application to the court for a dismissal or quashing of the prosecution upon constitutional grounds; however, if defendants should seek and obtain the data under the Freedom of Information Law (Public Officers Law, art 6, §§ 85-90), the court will allow them to renew their motions for an evidentiary hearing and for dismissal of the accusatory instruments, if they should then decide that such motions would be appropriate. People v Nelson (1980) 103 Misc 2d 847, 427 NYS2d 194.

Assessment records are public information and the form of the records or the petitioner's purpose in seeking them does not alter their public character or petitioner's concomitant right to inspect and copy them. Therefore, it was improper for the county to deny petitioner's request for copies of the county's assessment rolls and computer tape format. Szikszay v Buelow (1981) 107 Misc 2d 886, 436 NYS2d 558.

Because no specific provision governs copies of tax maps filed in the county office of the director of real property tax services, the Freedom of Information Law applies, and since there is no fee "otherwise prescribed by law," the county may charge only the actual cost of reproduction for copies of tax maps, excluding operator salaries.

Moreover, the county under Real P Tax Law § 1534 has no authority to include in its charge for copying tax maps a levy for map maintenance expense. Szikszay v Buelow (1981) 107 Misc 2d 486, 436 NYS2d 558.

In an action by an inmate who had been denied release on parole to compel the Division of Parole to grant him access to psychiatric records contained in his parole case record file and certain letters written to the Parole Board by persons opposed to his release, the board would be required to make the letters available to the court for an in camera inspection since the letters were not exempt from the freedom of information disclosure requirements of the Pub O Law; however, the psychiatric reports would not be made available to the inmate, since they were exempt from disclosure as interagency reports or as materials prepared by another agency. Jordan v Hammock (1981) 109 Misc 2d 1052, 441 NYS2d 363.

Members of a county legislature are not required to comply with the Freedom of Information Law in order to gain access to certain public record where such public officers seek the information while acting in their capacity as a public officers and are requesting the information as representatives of government who have a need to know in

PUBLIC OFFICERS LAW

§ 89. General provisions relating to access to records; certain cases

The provisions of this section apply to access to all records, except as hereinafter specified:

1. (a) The committee on 'open government' is continued and shall consist of the lieutenant governor or the delegate of such officer, the secretary of state or the delegate of such officer, whose office shall act as secretariat for the committee, the commissioner of the office of general services or the delegate of such officer, the director of the budget or the delegate of such officer, and seven other persons, none of whom shall hold any other state or local public office except the representative of local governments as set forth herein, to be appointed as follows: five by the governor, at least two of whom are or have been representatives of the news media, one of whom shall be a representative of local government who, at the time of appointment, is serving as a duly elected officer of a local government, one by the temporary president of the senate, and one by the speaker of the assembly. The persons appointed by the temporary president of the senate and the speaker of the assembly shall be appointed to serve, respectively, until the expiration of the terms of office of the temporary president and the speaker to which the temporary president and speaker were elected. The four persons presently serving by appointment of the governor for fixed terms shall continue to serve until the expiration of their respective terms. Thereafter, their respective successors shall be appointed for terms of four years. The member representing local government shall be appointed for a term of four years, so long as such member shall remain a duly elected officer of a local government. The committee shall hold no less than four meetings annually. The members of the committee shall be entitled to reimbursement for actual expenses incurred in the discharge of their duties.

(b) The committee shall:
i. furnish to any agency advisory guidelines, opinions or other appropriate information regarding this article;

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ii. furnish to any person advisory opinions or other appropriate information regarding this article;

iii. promulgate rules and regulations with respect to the implementation of subdivision one and paragraph (c) of subdivision three of section eighty-seven of this article;

iv. request from any agency such assistance, services and information as will enable the committee to effectively carry out its powers and duties; and

v. report on its activities and findings regarding articles six and seven of this chapter, including recommendations for changes in the law, to the governor and the legislature annually, on or before December fifteenth.

2. (a) The committee on public access to records may promulgate guidelines regarding deletion of identifying details or withholding of records otherwise available under this article to prevent unwarranted invasions of personal privacy. In the absence of such guidelines, an agency may delete identifying details when it makes records available.

(b) An unwarranted invasion of personal privacy includes, but shall not be limited to:

i. disclosure of employment, medical or credit histories or personal references of applicants for employment;

ii. disclosure of items involving the medical or personal records of a client or patient in a medical facility;

iii. sale or release of lists of names and addresses if such lists would be used for commercial or fund-raising purposes;

iv. disclosure of information of a personal nature when disclosure would result in economic or personal hardship to the subject party and such information is not relevant to the work of the agency requesting or maintaining it; or

v. disclosure of information of a personal nature reported in confidence to an agency and not relevant to the ordinary work of such agency.

(c) Unless otherwise provided by this article, disclosure shall not be construed to constitute an unwarranted invasion of personal privacy pursuant to paragraphs (a) and (b) of this subdivision:

i. when identifying details are deleted;

ii. when the person to whom a record pertains consents in writing to disclosure;

iii. when upon presenting reasonable proof of identity, a person seeks access to records pertaining to him.

(Added, L 1983)

2-a. Nothing in this article shall permit disclosure which constitutes an unwarranted invasion of personal privacy as defined in subdivision two of this section if such disclosure is prohibited under section ninety-six of this chapter.

3. Each entity subject to the provisions of this article, within five business days of the receipt of a written request for a record reasonably described, shall make such record available to the person requesting it, deny such request in writing or furnish a written acknowledgement of the receipt of such request and a statement of the approximate date when such request will be granted or denied, including, where appropriate, a statement that access to the record will be determined in accordance with subdivision five of this section. Upon payment of, or offer to pay, the fee prescribed therefor, the entity shall provide a copy of such record and certify to the correctness of such copy if so requested, or as the case may be, shall certify that it does not have possession of such record or that such record cannot be found after diligent search. Nothing in this article shall be construed to require any entity to

prepare any record not possessed or maintained by such entity except the record specified in subdivision three of section eighty-seven and subdivision three of section eighty-eight.

4. (a) *Except as provided in subdivision five of this section, any person denied access to a record may within thirty days appeal in writing such denial to the head chief executive or governing body of the entity, or the person therefor designated by such head, chief executive, or governing body, who shall within seven business days of the receipt of such appeal fully explain in writing to the person requesting the record the reasons for further denial, or provide access to the record sought. In addition, each agency shall immediately forward to the committee on public access to records a copy of such appeal and the determination thereon.*

(b) *Except as provided in subdivision five of this section, a person denied access to a record in an appeal determination under the provisions of paragraph (a) of this subdivision may bring a proceeding for review of such denial pursuant to article seventy-eight of the civil practice law and rules. In the event that access to any record is denied pursuant to the provisions of subdivision two of section eighty-seven of this article, the agency involved shall have the burden of proving that such record falls within the provisions of such subdivision two.*

(Added, L 1982)

(c) The court in such a proceeding may assess, against such agency involved reasonable attorney's fees and other litigation costs reasonably incurred by such person in any case under the provisions of this section in which such person has substantially prevailed, provided, that such attorney's fees and litigation costs may be recovered only where the court finds that:

i. the record involved was, in fact, of clearly significant interest to the general public; and

ii. the agency lacked a reasonable basis in law for withholding the record.

(Added L 1981)

5. (a)(1) A person acting pursuant to law or regulation who, subsequent to the effective date of this subdivision, submits any information to any state agency may, at the time of submission, request that the agency except such information from disclosure under paragraph (d) of subdivision two of section eighty-seven of this article. Where the request itself contains information which if disclosed would defeat the purpose for which the exception is sought, such information shall also be excepted from disclosure.

(2) The request for an exception shall be in writing and state the reasons why the information should be excepted from disclosure.

(3) Information submitted as provided in subparagraph one of this paragraph shall be excepted from disclosure and be maintained apart by the agency from all other records until fifteen days after the entitlement to such exception has been finally determined or such further time as ordered by a court of competent jurisdiction.

(b) On the initiative of the agency at any time, or upon the request of any person for a record excepted from disclosure pursuant to this subdivision, the agency shall:

(1) inform the person who requested the exception of the agency's intention to determine whether such exception should be granted or continued;

(2) permit the person who requested the exception, within ten business days of receipt of notification from the agency, to submit a written statement of the necessity for the granting or continuation of such exception;

(3) within seven business days of receipt of such written statement, or within seven business days of the expiration of the period prescribed for submission of such

exception and stating the reasons therefor; copies of such determination shall be served upon the person, if any, requesting the record, the person who requested the exception, and the committee on public access to records.

(c) A denial of an exception from disclosure under paragraph (b) of this subdivision may be appealed by the person submitting the information and a denial of access to the record may be appealed by the person requesting the record in accordance with this subdivision:

(1) Within seven business days of receipt of written notice denying the request, the person may file a written appeal from the determination of the agency with the head of the agency, the chief executive officer or governing body or their designated representatives.

(2) The appeal shall be determined within ten business days of the receipt of the appeal. Written notice of the determination shall be served upon the person, if any, requesting the record, the person who requested the exception and the committee on public access to records. The notice shall contain a statement of the reasons for the determination.

(d) A proceeding to review an adverse determination pursuant to paragraph (c) of this subdivision may be commenced pursuant to article seventy-eight of the civil service law and rules. Such proceeding must be commenced within fifteen days of the service of the written notice containing the adverse determination provided for in subparagraph two of paragraph (c) of this subdivision.

(e) The person requesting an exception from disclosure pursuant to this subdivision shall in all proceedings have the burden of proving entitlement to the exception.

(f) Where the agency denies access to a record pursuant to paragraph (d) of subdivision two of section eighty-seven of this article, the agency shall have the burden of proving that the record falls within the provisions of such exception.

(g) Nothing in this subdivision shall be construed to deny any person access, pursuant to the remaining provisions of this article, to any record or part excepted from disclosure upon the express written consent of the person who had requested the exception.

(h) As used in this subdivision the term "agency" or "state agency" means only a state department, board, bureau, division, council or office and any public corporation the majority of whose members are appointed by the governor.

6. Nothing in this article shall be construed to limit or abridge any otherwise available right of access at law or in equity of any party to records.

(Added, L 1983)

7. Nothing in this article shall require the disclosure of the home address of an officer or employee, former officer or employee, or of a retiree of a public employees' retirement system; nor shall anything in this article require the disclosure of the name or home address of a beneficiary of a public employees' retirement system or of an applicant for appointment to public employment; provided however, that nothing in this subdivision shall limit or abridge the right of an employee organization, certified or recognized for any collective negotiating unit of an employer pursuant to article fourteen of the civil service law, to obtain the name or home address of any officer, employee or retiree of such employer, if such name or home address is otherwise available under this article.

HISTORY:

Add. L 1977, ch 933, eff Jan 1, 1978.

Former § 89, repealed, L 1977, ch 933, eff Jan 1, 1978.

Sub 1, par (a), amd. L 1981, ch 975, § 1, eff Jan 1, 1982. L 1983, ch 80, § 2, eff May 10, 1983.

The 1983 act deleted at fig 1 "public access to records".

Sub 1, par (b), subpar v, amd, L 1983, ch 80, § 2, eff May 10, 1983.

Sub 2-a, add, L 1983, ch 652, § 3, eff Sept 1, 1984.

Sub 3, amd, L 1981, ch 890, § 2, eff Jan 1, 1982, and applicable only to records submitted on or after such date.

Sub 4, amd, L 1981, ch 890, § 2, eff Jan 1, 1982, and applicable only to records submitted on or after such date.

The 1981 act deleted at figs 1 and 2 "Any".

Sub 4, par (c), add, L 1982, ch 73, § 2, eff Oct 15, 1982, applicable only to actions commenced on or after such date.

Sub 5, add, L 1981, ch 890, § 3, eff Jan 1, 1982, and applicable only to records submitted on or after such date.

Former sub 5, add, L 1977, ch 933, eff Jan 1, 1978, renumbered sub 6, L 1981, ch 890, § 3, eff Jan 1, 1982, and applicable only to records submitted on or after such date.

Sub 6, formerly sub 5, renumbered sub 6, L 1981, ch 890, § 3, eff Jan 1, 1982, and applicable only to records submitted on or after such date.

Sub 7, add, L 1983, ch 783, § 1, eff July 30, 1983. See 1983 note.

Laws 1980, ch 677, §§ 1-4, eff June 30, 1980, provides as follows:

Section 1. Legislative declaration. The legislature declares as follows:

(a) The right to personal privacy is a fundamental right guaranteed by the Constitution of the United States.

(b) The past decade has seen a massive increase in the number, size and complexity of data banks and information systems maintained by the agencies, departments, bureaus, and commissions of the state of New York.

(c) Many of these data banks and information systems contain information about individuals, including information of the most personal and sensitive nature.

(d) The existence of these data banks and information systems and the increasingly sophisticated technology that makes them possible pose a potential threat to the right of privacy.

(e) The legislature seeks to assess the extent, if any, to which such a threat now exists so as to determine what legislative action, if any, is necessary to regulate the creation, maintenance and use of these systems.

(f) In order to make such an assessment, the legislature needs to gather information on each system now in existence under the aegis of the state of New York.

§ 2. Definitions. (a) Agency. The term "agency" means any state board, bureau, commission, council, department, public authority, division, office or other governmental entity performing a governmental or proprietary function for the state of New York, except the judiciary, the state legislature or any unit of local government.

(b) Person. The term "person" means any individual about whom personal information has been collected by an agency.

(c) Personal information. The term "personal information" means any information concerning a person which, because of name, identifying number, symbol, mark or other identifying particular or combination of particulars, can be particularly associated with that person.

(d) Record. The term "record" means any information kept, held, filed, produced or reproduced by, with or for an agency, in any physical form whatsoever, including, but not limited to, reports, statements, examinations, memoranda, opinions, files, folders, books, manuals, pamphlets, forms, papers, designs, drawings, maps, photos, letters, microfilms, computer tapes or discs, rules, regulations or codes.

(e) System of records. The term "system of records" means any group of records pertaining to one or more persons from which personal information may be retrieved by use of the name or other identifying particular or combination of particulars of a person.

(f) Disclosure. The term "disclosure" means revealing, releasing, transferring,

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OFFICE OF THE
SECRETARY OF STATE



JOHN W. FAINTER, JR.
SECRETARY OF STATE

June 20, 1984

EXECUTIVE DIVISION
P.O. Box 12697
Austin, Texas 78711
512 475-2015

Publications
P.O. Box 13824
512 475-7886

ELECTIONS DIVISION
P.O. Box 12887
512 475-3091

Disclosure Filings Section
P.O. Box 12887
512 475-5619

DATA SERVICES
P.O. Box 12887
512 475-7881

SUPPORT SERVICES
DIVISION

Financial Management
P.O. Box 12887
512 475-0271

State Services
P.O. Box 12887
512 475-5775

STATUTORY FILINGS
DIVISION

Corporations
P.O. Box 13697
512 475-3551

Statutory Documents
P.O. Box 12887
512 475-3061

Uniform Commercial Code
P.O. Box 13193
512 475-3457

Business Opportunities
P.O. Box 13563
512 475-1769

Notary Public
P.O. Box 12079
512 475-2703

Trademarks
P.O. Box 12887
512 475-1362

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

Dear Mr. Gross:

Secretary of State John Fainter referred your letter of May 10, 1984 to me. I received this letter on May 14, 1984. The following information is submitted in response to your questions concerning the process by which the public may review or receive copies of political campaign reports filed in our office. I am setting out your questions and my answers in the order in which you asked the questions.

1. Do you keep files of reports of state and local election activity, (i.e., contributions and disbursements related to campaigns for local and state offices) separate from your files of reports of federal activities (i.e., contributions and disbursements for U.S. House, U.S. Senate, or President)?

Yes. Sworn statements of contributions and expenditures and designation of campaign treasurers for candidates and officeholders and certain political action committees involved in an election in this state are filed separately from files of reports for federal political campaign activities.

a. Please describe in detail how the federal reports are separated from the state and local reports e.g., by separate folder, separate cabinets, separate rooms.

FEC forms and state filings are filed in separate rooms in the Disclosure Filings Office.

b. Are there clear markings or other indications on the folders, cabinets, or in the rooms to indicate whether the reports contained therein are state or federal?

The rooms are not marked to indicate that they contain FEC or state files. However, the file cabinets and folders in each room are clearly labeled to identify FEC and state materials.

2. Do you require reports to be filed on state forms?

Reports of federal activities (i.e. contributions and disbursements for U.S. House, U.S. Senate, or President) are not required to be filed on state forms. Tex. Elec. Code Ann. art. 14.07(H) (7) requires candidates for offices created under laws of the United States to file copies of any reports required by federal laws with the secretary of state on the same date they file such reports with the appropriate federal authorities. A report filed under Chapter 14 by a state officeholder or candidate to a public office in this state or a political action committee involved in a state election must use the forms prescribed by the secretary of state.

a. Do you permit reports to be filed on computerized forms?

No. As mentioned above, the forms filed under Chapter 14 must be those prescribed by the secretary of state. However, this office allows the reporting entity to attach a computer printout of their records of contributors or expenditures to the sworn statements of contributions and expenditures.

b. When reports on federal activity are filed, must these reports be filed on state forms or may the reporting entity submit a copy of the report sent to the Federal Election Commission, the Clerk of the House, or the Secretary of the Senate?

As mentioned above, when reports on federal activity are filed, the reporting entity must submit to the Secretary of State copies of the report sent to federal authorities.

3. When a person comes to review a report, does he or she have to register at a desk and request specific copies or may he or she go to the appropriate file and pull out the report needed?

A person wishing to review a report filed in our office must register with a receptionist and request a specific

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file or files. The person requesting a file may not go directly into the file rooms or file cabinets. Once a person has a file, he or she may review any of the reports filed in the folder but may not remove any forms or files from the office. If the requested reports are on microfiche, staff members set up the film for the person making the inquiry.

4. When reports are reviewed by a requestor, does the requestor see the report in the form it was filed or on a computer printout with the same information?

If computer printouts are reviewed, do they indicate whether the information on the printout comes from the state or the federal reports?

The reports are filed as they are received and any person wishing to review a file would see the reports as they were originally filed. These records are available on microfiche or in hard copy depending on how old the records are.

5. When a requestor asks for copies of reports that he or she may retain are these copies sold (or given) to the requestor in the form of a copy of the actual report or as a computer printout?

Copies of reports are sold at 55¢ for the first page and 15¢ per page thereafter. For microfiched reports the copies are 75¢ for the first page and 25¢ per page thereafter. We have recently expanded our facilities and services, but computer printouts are not yet available from our office.

6. Is there any labeling or other designation on copies of the reports indicating whether they are for state or federal campaign activity?

Since the copies of reports are made from the original reports, these are clearly labeled as "State Election Forms" or FEC forms.

7. Does your office keep records of the names of persons who review or request reports and what reports they are reviewing or requesting?

Yes, these request forms are filed in our office and kept in chronological order. (See enclosed form.)

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8. Does your state have a statute or regulation similar to 2 U.S.C. § 438(a)(4) or 11 C.F.R. § 104.5 (copies enclosed) prohibiting the use of contributors' names for solicitation or for other commercial purposes?

No.

a. If the answer is yes, please enclose a copy of the appropriate statute and/or regulation?

N/A

9. Does the National Conservative Political Action Committee (NCPAC) file reports with your office?

Yes.

a. If the answer is yes, when did NCPAC begin to file reports with your office?

The NCPAC filed a designation of campaign treasurer for a state campaign general purpose political committee on May 26, 1978 and dissolved on October 31, 1978. We have no further record of NCPAC filing as a political action committee involved in state campaign activity.

The NCPAC has filed extensive reports on federal campaign activity with the secretary of state. These date as far back as 1977 on microfiche, and I have been unable to trace the earliest reports. Our oldest records are kept in the archives. Many of these files are presently being microfiched. I hope to have an answer for your office by the end of next week.

b. Does NCPAC file one report or separate reports for state campaign activity and federal campaign activity?

The NCPAC filed separate reports when it was a state political action committee. As a federal political action committee, it has filed only on FEC forms.

i. If NCPAC's practice has changed from filing one combined state-federal report to filing separate reports, please state when this practice began.

The only state reports we have found were separate from federal reports. Our review of the older FEC files may show a different result.

c. Does NCPAC file on state reporting forms or on computer print-outs containing the required information?

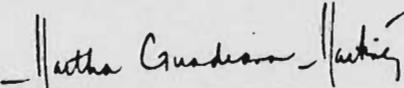
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i. If NCPAC has been filing on computer print-outs, please state when it began this practice and whether this practice is for both state and federal reports.

The files we have reviewed thus far show that NCPAC has filed reports using computer printouts as far back as 1977. We are reviewing older files and should soon have an answer about when it began this practice.

If you have any questions about these matters, please contact this office. We should have the answers to your questions on NCPAC soon.

Sincerely,


Martha G. Martinez
Assistant General Counsel
Elections Division

MGM:bl

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March Fong Eu
Secretary of State

1230 J Street
P.O. Box 1467
Sacramento, California 95807

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POLITICAL REFORM DIVISION
(916) 322-4880

July 3, 1984

Kenneth A. Gross
Associate General Counsel
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Gross:

I'm sorry to respond so slowly to your questions sent to me on May 10th. We had a primary election last month which creates a mildly chaotic atmosphere and I simply put your communication aside until the dust settled.

I have responded in red ink on the actual pages you mailed to me with the questions. I hope this kind of response is helpful. I am also enclosing a copy of our California POLITICAL REFORM ACT for your information. I call particular attention to which reads "no conditions whatsoever shall be imposed upon persons desiring to inspect or reproduce reports and statements filed under this title, nor shall any information or identification be required from such persons."

If I can provide you with any further information, please do not hesitate to let me know.

Most sincerely,

MARIAN ASH
Assistant Chief

Enclosures

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 10, 1984



Honorable Mari~~an~~ Ash
Political Reform Division
Office of the Secretary of State
Box 1467, 1230 J Street
Sacramento, California 95814

Dear Ms. Ash:

The Federal Election Commission, established in April 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code. In connection with an investigation being conducted by the Commission, the Commission's Office of General Counsel has attached questions addressing the process by which members of the public may review or receive copies of political campaign finance reports filed with your office.

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

Please submit this information within two weeks of your receipt of this letter. If you have any questions, please direct them to Jonathan Levin, the attorney handling this matter, at 202 523-4000.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Questions

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Questions to: Honorable Marian Ash
Political Reform Division

Below are questions aimed at discovering how your office sets up files for campaign finance reports received by candidate campaign committees, political party committees, political action committees, or other reporting entities.

1. Do you keep files of reports of state and local election activity, (i.e., contributions and disbursements related to campaigns for local and state offices) separate from your files of reports of federal activities (i.e., contributions and disbursements for U.S. House, U.S. Senate, or President)? YES.

a. Please describe in detail how the federal reports are separated from the state and local reports e.g., by separate folder, separate cabinets separate rooms.
IN A SEPARATE AREA.

b. Are there clear markings or other indications on the folders & cabinets, ~~or in the rooms~~ to indicate whether the reports contained therein are state or federal? YES.

2. Do you require reports to be filed on state forms? NO.

a. Do you permit reports to be filed on computerized forms? YES.

b. When reports on federal activity ^{NO.} are filed, must these reports be filed on state forms ~~or~~ may the reporting entity submit a copy of the report sent to the Federal Election Commission, the Clerk of the House, or the Secretary of the Senate? YES.

3. When a person comes to review a report, does he or she have ~~to register at a desk and request specific copies or may he or she go to the appropriate file and pull out the report needed?~~ YES

NO - THE PUBLIC HAS NO ACCESS TO ACTUAL FILES.

YES
MUST
REQUEST
AND WE
PROVIDE.

4. When reports are reviewed by a requestor, does the requestor see the report in the form it was filed or on a computer print-out with the same information? THEY SEE THE FORM FILED OR AN

exact copy (xerox)
If computer print-outs are reviewed, do they indicate whether the information on the print-out comes from the state or the federal reports?

5. When a requestor asks for copies of reports that he or she may retain are these copies sold (~~or given~~) to the requestor in the form of a copy of the actual report or ~~as a computer print-out?~~

Actual copy of report @ 30¢ per page.

6. Is there any labeling or other designation on copies of the reports indicating whether they are for state or federal campaign activity?

They are FEC FORMS, TOTALLY UNLIKE
STATE FORMS. NO LABEL IS NECESSARY.

REG NO
WE REQUIRE
NO INFO OR
IDENT AT ALL

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Questions to: Honorable Marian Ash
Political Reform Division

7. Does your office keep records of the names of persons who review or request reports and what reports they are reviewing or requesting? NO - STATE LAW PROHIBITS OUR REQUIRING ANY INFO OR IDENTIFICATION OR IMPOSING ANY CONDITIONS UPON SUCH PERSONS. § 81008 GOVT Code.

8. Does your state have a statute or regulation similar to 2 U.S.C. § 438(a)(4) or 11 C.F.R. § 104.5 (copies enclosed) prohibiting the use of contributors' names for solicitation or for other commercial purposes? NO.

a. If the answer is yes, please enclose a copy of the appropriate statute and/or regulation?

9. Does the National Conservative Political Action Committee (NCPAC) file reports with your office? YES

a. If the answer is yes, when did NCPAC begin to file reports with your office? EXISTING LOGS ONLY GO BACK TO 4/81, BUT MAY HAVE FILED PRIOR TO THAT.

b. Does NCPAC file one report or separate reports for state campaign activity and federal campaign activity? NCPAC HAS FILED SEPARATE STATE REPORTS SINCE 1978.

i. If NCPAC's practice has changed from filing one combined state-federal report to filing separate reports, please state when this practice began.

c. Does NCPAC file on state reporting forms or on computer print-outs containing the required information? FEC FORMS-1984

i. If NCPAC has been filing on computer print-outs, please state when it began this practice and whether this practice is for both state and federal reports.

WE RETAINED NO COPIES IN-HOUSE PRIOR TO 1984 BUT OUR ENCLOSEURE LOGS INDICATE NCPAC HAS BEEN FILING ON FEC Statute and regulation sections FORMS SINCE 4/81.

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GCC#4949

J. Levin

LAW OFFICES
PERAZICH & WATSON, P.C.

JOHN PERAZICH*
MATTHEW S. WATSON**
PATRICIA A. WYNN

SUITE 720
1825 K STREET, N.W.
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(202) 331-7530

OF COUNSEL
MARK PESTRONK
VIRGINIA COUNSEL
RICHARD M. WEXELL

* ALSO ADMITTED IN MARYLAND
** ALSO ADMITTED IN NEW YORK

October 2, 1984

HAND-DELIVERED

Kenneth A. Gross, Esq.
Associate General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 1542

Meyer T. Cohen
Thomas L. Mays
Victor K. Heyman
Working Names, Inc.
Heyman Consulting Group, Inc.

OCT 2 1984
PI2: 59

Dear Mr. Gross:

On behalf of the above-named respondents, this is to formally request preprobable-cause conciliation in the subject matter.

Sincerely,

Matthew S. Watson

Matthew S. Watson

MSW:dh

cc: Jonathan Levin, Esq.

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Julia H. Tashjian
Secretary of the State
Bernard P. Auger
Deputy Secretary of the State

Office of the Secretary of the State
State of Connecticut
30 Trinity Street
Hartford, Connecticut 06106

October 26, 1984

Attorney Kenneth A. Gross
Associate General Counsel
Federal Elections Commission
1325 K. Street N.W.
Washington D.C. 20463

84 NOV 2
AID: 52

RECEIVED
GENERAL INVESTIGATIVE
DIVISION

Dear Attorney Gross,

I hope this letter reaches you this time. Enclosed please find the answers to your questionnaire.

Very Truly Yours,

David L. Guay

David L. Guay
Campaign Finance Supervisor

88040574858

PHONE:

Answers to questions by: Kenneth A. Gross

Associate General Counsel

Below are answers to questions about how the Campaign Finance Section of the Office of the Secretary of the State of Connecticut files and maintains Campaign Finance disclosure statements.

Questions 1.- 1a. - 1b.

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All Federal disclosure statements are filed and maintained separately from state and local disclosure statements. Federal and State disclosure statements are filed and maintained in the Campaign Finance Section of the Elections Division of the Office of the Secretary of the State. A labeled set of file cabinets separate from those used for State files contain the Federal disclosure statements. A single file cabinet is kept in the Campaign Finance Section office, which contains those reports received for the current calendar year. Within that cabinet the reports are filed by committee type (Presidential, U.S. Senate, U.S. House, PACs). Within a committee type the reports are filed alphabetically by committee name in separate filed folders.

Prior years are maintained in a locked wire cage in the basement of the building which houses the Campaign Finance Section. In the wire cage PAC's are filed by Committee name alphabetically with all previous years filed together in one committee folder. Candidate Committees for the offices of U.S. Senate and U.S. House are filed by election year with candidate committees within an election year filed alphabetically within a district or office sought.

Questions 2. - 2a. - 2b.

Federal disclosure statements received in Connecticut are not required to be filed on state forms. In Connecticut we permit reports to be filed on computerized forms, provided the computerized versions contain all the required information in the required format. Federal disclosure reports filed in Connecticut are copies of reports filed with the Federal Election Commission in Washington, the Clerk of the House or the Secretary of the Senate. We do not require them to be submitted on state forms.

Question 3.

A person requesting to review a report must see a member of the Campaign Finance Section and request a specific Committee report or a series of Committee reports, which a staff member will retrieve. If a person is doing extensive research, free access to the files is granted on a case by case basis.

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Question 4.

Currently, when reports are reviewed by a requestor, the report is in the form it was filed, within six months all federal reports filed and maintained in Connecticut will be in microfilm form.

Question 5.

A requestor who asks for a copy of a report is given a photo copy of the original report at the rate of 10¢ per page if the number of pages copied exceeds ten pages and the requestor performs the copying. If a Campaign Finance staff member performs the copying, the charge is 10¢ for the first 50 pages and 15¢ per page for above 50 pages.

Question 6.

No specific labeling of copies is performed by the Campaign Finance Section. Distinction between a Federal report and a State report is by the type of report form (Federal or State). A Connecticut Statement of Receipts and Expenditures is easily identified as different from a Federal Statement.

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Question 7.

The Campaign Finance Section does not currently record the names of persons who review or request reports and what reports are reviewed or requested.

Question 8.

The State of Connecticut does not currently have a statute or regulation similar to 2 U.S.C. S/S 438(a)(4) or 11 C.F.R. S/S 104.5.

Question 9.

Yes, the National Conservative Political Action Committee (NCPAC) does file Federal Disclosure with this office. Our files indicate that they have been filing such reports since January 1981. NCPAC files only Federal reports for Federal for Federal campaign activity. NCPAC does not have a separate political committee which must be registered with this office to engage in state activity, thus does not file on any state forms. The federal NCPAC filings are partially on computer print-outs, the first of this type was received in this office in June of 1981.

33040574872



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 10, 1984

RECEIVED

MAY 14 1984

ELECTION DIVISION

Honorable Julie Tashjian
Secretary of State
30 Trinity Street
Hartford, Connecticut 06115

Dear Ms. Tashjian:

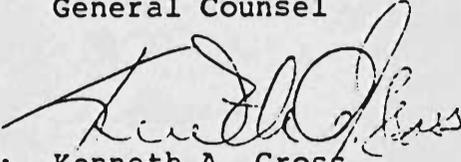
The Federal Election Commission, established in April 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code. In connection with an investigation being conducted by the Commission, the Commission's Office of General Counsel has attached questions addressing the process by which members of the public may review or receive copies of political campaign finance reports filed with your office.

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

Please submit this information within two weeks of your receipt of this letter. If you have any questions, please direct them to Jonathan Levin, the attorney handling this matter, at 202 523-4000.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosure
Questions

33040574873

Questions to: Honorable Julie Tashijan
Secretary of State

Below are questions aimed at discovering how your office sets up files for campaign finance reports received by candidate campaign committees, political party committees, political action committees, or other reporting entities.

1. Do you keep files of reports of state and local election activity, (i.e., contributions and disbursements related to campaigns for local and state offices) separate from your files of reports of federal activities (i.e., contributions and disbursements for U.S. House, U.S. Senate, or President)?

a. Please describe in detail how the federal reports are separated from the state and local reports e.g., by separate folder, separate cabinets, separate rooms.

b. Are there clear markings or other indications on the folders, cabinets, or in the rooms to indicate whether the reports contained therein are state or federal?

2. Do you require reports to be filed on state forms?

a. Do you permit reports to be filed on computerized forms?

b. When reports on federal activity are filed, must these reports be filed on state forms or may the reporting entity submit a copy of the report sent to the Federal Election Commission, the Clerk of the House, or the Secretary of the Senate?

3. When a person comes to review a report, does he or she have to register at a desk and request specific copies or may he or she go to the appropriate file and pull out the report needed?

4. When reports are reviewed by a requestor, does the requestor see the report in the form it was filed or on a computer print-out with the same information?

If computer print-outs are reviewed, do they indicate whether the information on the print-out comes from the state or the federal reports?

5. When a requestor asks for copies of reports that he or she may retain are these copies sold (or given) to the requestor in the form of a copy of the actual report or as a computer print-out?

6. Is there any labeling or other designation on copies of the reports indicating whether they are for state or federal campaign activity?

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Page 2

Questions to: Honorable Julie Tashijan
Secretary of State

7. Does your office keep records of the names of persons who review or request reports and what reports they are reviewing or requesting?

8. Does your state have a statute or regulation similar to 2 U.S.C. § 438(a)(4) or 11 C.F.R. § 104.5 (copies enclosed) prohibiting the use of contributors' names for solicitation or for other commercial purposes?

a. If the answer is yes, please enclose a copy of the appropriate statute and/or regulation?

9. Does the National Conservative Political Action Committee (NCPAC) file reports with your office?

a. If the answer is yes, when did NCPAC begin to file reports with your office?

b. Does NCPAC file one report or separate reports for state campaign activity and federal campaign activity?

i. If NCPAC's practice has changed from filing one combined state-federal report to filing separate reports, please state when this practice began.

c. Does NCPAC file on state reporting forms or on computer print-outs containing the required information?

i. If NCPAC has been filing on computer print-outs, please state when it began this practice and whether this practice is for both state and federal reports.

*Rec'd
June 27*

Enclosure

Statute and regulation sections

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2 U.S.C.

§438. Administrative provisions

(a) *Duties of Commission.* The Commission shall—

(4) within 48 hours after the time of the receipt by the Commission of reports and statements filed with it, make them available for public inspection, and copying, at the expense of the person requesting such copying, except that any information copied from such reports or statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee. A political committee may submit 10 pseudonyms on each report filed in order to protect against the illegal use of names and addresses of contributors, provided such committee attaches a list of such pseudonyms to the appropriate report. The Clerk, Secretary, or the Commission shall exclude these lists from the public record;

11 C.F.R.

§104.15 Sale or use restriction (2 U.S.C. 438(a)(4)).

(a) Any information copied, or otherwise obtained, from any report or statement, or any copy, reproduction, or publication thereof, filed with the Commission, Clerk of the House, Secretary of the Senate, or any Secretary of State or other equivalent State officer, shall not be sold or used by any person for the purpose of soliciting contributions or for any commercial purpose, except that the name and address of any political committee may be used to solicit contributions from such committee.

(b) For purposes of 11 CFR 104.15, "soliciting contributions" includes soliciting any type of contribution or donation, such as political or charitable contributions.

(c) The use of information, which is copied or otherwise obtained from reports filed under 11 CFR Part 104, in newspapers, magazines, books or other similar communications is permissible as long as the principal purpose of such communications is not to communicate any contributor information listed on such reports for the purpose of soliciting contributions or for other commercial purposes.

RECEIVED

MAY 14 1984

ELECTION DIVISION

33040574876

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Working Names, Inc.)	MUR 1542
Meyer T. Cohen)	
Heyman Consulting Group, Inc.)	
Victor K. Heyman)	
Thomas L. Mays)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 30, 1984, the Commission decided by a vote of 6-0 to take the following actions in MUR 1542:

1. Enter into conciliation with Working Names, Inc. and Meyer Cohen, Heyman Consulting Group, Inc. and Victor K. Heyman, and Thomas L. Mays.
2. Approve the proposed conciliation agreements submitted with the General Counsel's Report signed October 25, 1984.
3. Approve and send the letters attached to the General Counsel's Report signed October 25, 1984.

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

Attest:

10-31-84

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:	10-25-84, 4:09
Circulated on 48 hour tally basis:	10-26-84, 2:00

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In the Matter of)
)
Working Names, Inc.)
Meyer T. Cohen)
Heyman Consulting Group, Inc.) MUR 1542
Victor K. Heyman)
Thomas L. Mays)

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GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter involves complaints filed by the National Conservative Political Action Committee ("NCPAC") alleging violations of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.

On April 4, 1983, the General Counsel received a complaint from counsel for the National Conservative Political Action Committee ("NCPAC") stating that American Printing House for the Blind ("the Printing House") had sent a fundraising letter to one of the pseudonyms submitted by NCPAC to the Reports Analysis Division, and that violations of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15 had occurred. NCPAC stated that its own investigation revealed that a list containing the pseudonym was rented to the Printing House by Working Names, Inc. ("Working Names"). NCPAC further alleged that Meyer T. Cohen, an officer of Working Names, had admitted that Working Names rented the list to the Printing House. The complaint also stated that Mr. Cohen claimed that he was merely the broker for the list, but he refused to disclose the identities of the list owners. Finally, the complaint alleged that Mr. Cohen admitted that some of the names on the list came from filings with certain Secretaries of State. This complaint was subsequently numbered as MUR 1541.

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Also on April 4, this Office received a second complaint from NCPAC referencing the first complaint and stating that the Republican National Committee ("the RNC") had sent a fundraising letter to the same pseudonym. NCPAC alleged that the RNC received its list from Preferred Lists. The complaint further claimed that Preferred Lists stated that Working Names provided them with the list. This complaint was subsequently numbered as MUR 1542.

On July 15, 1983, the Commission found no reason to believe that the Printing House or the RNC violated 2 U.S.C. § 438(a)(4) or 11 C.F.R. § 104.15. The Commission, however, found that there was reason to believe Preferred Lists and Working Names violated those sections of the Act and Regulations. Interrogatories were sent to Preferred Lists and Working Names and also to Carol Enters List Company ("CELCO"), the list broker for the transaction involving the Printing House.

In a meeting with counsel for Working Names on August 3, 1983, */ and in a letter received from Meyer T. Cohen, President of Working Names, on August 12, 1983, it was revealed that the list owners are Victor K. Heyman and Heyman Consulting Group, Inc. ("Heyman Consulting") of Rockville, Maryland and Thomas L. Mays of Washington, D.C. Mr. Cohen's response indicated that the functions of the participants dealing with the list were divided as follows: Working Names advertises and markets the list and receives payment from the list users, Victor Heyman and Heyman

*/ The designation of counsel filed by Working Names indicated that Mr. Watson is counsel for Working Names, Thomas L. Mays and Heyman Consulting.

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Consulting perform computer processing of the list material, entering the names which they receive onto computer tapes and duplicating the tapes or producing mailing labels from the tape information, and Mays obtains the names themselves. According to oral representations by counsel and Meyer Cohen's written response, Mr. Mays travels to the various offices of the Secretaries of State and obtains the filings made for state and local elections and does not "knowingly" use any material required by federal law to be filed with a Secretary of State. In addition, in his written response, Mr. Cohen maintains that NCPAC filings are made on computer printouts and, if a NCPAC form were filed incorrectly by a Secretary of State, "it would not be immediately apparent that a restricted federal form had been obtained." Mr. Cohen's response further stated that, "[d]ue to the large volume of material handled, after entry of a name onto computer tape, the underlying document is not maintained," and, therefore, the source of the "alleged decoy" cannot be determined.

This Office contacted the Boards of Election in Virginia and Maryland and was told that reports for state committees and federal political committees are kept in separate files and segregated from one another. Based upon this information, this Office, with the Commission's approval, sent a letter, on October 3, 1983, to the complainant asking it if it had included the solicited pseudonym on any list or report other than the

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report of contributors submitted to the Commission. On October 18, NCPAC replied that the pseudonym "was not used by NCPAC on any report or list of names filed with any agency other than the Federal Election Commission."

On February 7, 1984, the Commission found reason to believe that Meyer Cohen, Thomas L. Mays, and Victor K. Heyman and the Heyman Consulting Group, Inc. violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.

On March 15, 1984, counsel for the respondents replied that the use of only one pseudonym was discovered and that this indicated that any violation by his client is not ongoing. Counsel also repeated his explanation that the use of any NCPAC names may have resulted from misfiling at the office of a secretary of state. In an affidavit submitted along with counsel's response, Mr. Mays listed the offices of the secretary of state in eight states as the sources of the list, "Truly Conservative Contributors."

On May 10, 1984, this Office sent questions to these eight offices inquiring as to the process by which members of the public may review or receive copies of political campaign finance reports and as to whether and how state reports are separated from federal reports. Procedures differ from state to state. All but one of the states separate state filings from federal filings. This is done by having a separate state office for the receipt of filings for state office, by separate filing rooms, or by separate, clearly marked cabinets. The Florida Secretary of State's office stated that it does not separate federal and state files in the above manner. It

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also stated that NCPAC files reports on computerized form and does not separate federal and state activity. On October 2, 1984, while this Office was preparing briefs in this matter, we received a letter from _____ counsel requesting pre-probable cause conciliation. (See Attachment 1).

II. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

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IV. RECOMMENDATIONS

1. Enter into conciliation with Working Names, Inc. and Meyer Cohen, Heyman Consulting Group, Inc. and Victor K. Heyman, and Thomas L. Mays.
2. Approve the attached proposed conciliation agreements.
3. Approve and send the attached letters.

Charles N. Steele
General Counsel

October 25, 1984
Date

By:

Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

Attachments

1. Letter from counsel, dated October 2, 1984.
2. Proposed letter to counsel for respondents.
3. Proposed conciliation agreements.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 1, 1984

Matthew S. Watson, Esquire
Kaswell, Perazich & Watson, P.C.
1825 K Street, N.W.
Suite 720
Washington, D.C. 20006

Re: MUR 1542
Working Names, Inc.
Meyer T. Cohen
Heyman Consulting Group, Inc.
Victor K. Heyman
Thomas L. Mays

Dear Mr. Watson:

On July 15, 1983, the Commission found reason to believe that Working Names, Inc. violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. On February 7, 1984, the Commission found reason to believe that Meyer T. Cohen, Thomas L. Mays, and Victor K. Heyman and the Heyman Consulting Group, Inc. violated those sections. At your request, the Commission determined on October 30, 1984, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed are conciliation agreements that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreements, please have them sign and return the agreements, along with the civil penalties to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If you have any questions or suggestions for changes in the agreement, or if you wish to

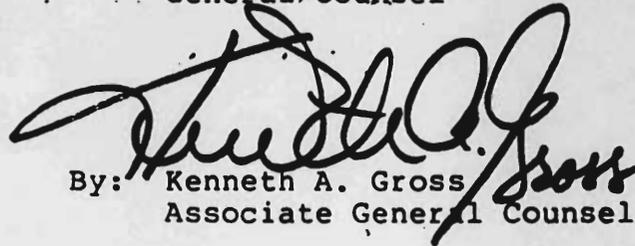
23040574887

Letter to Matthew S. Watson
Page 2

arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Jonathan Levin, the attorney assigned to this matter, at (202)523-4000.

Sincerely,

Charles N. Steele
General Counsel



By: Kenneth A. Gross
Associate General Counsel

Enclosures

88040674885

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

In the Matter of)	
)	
Preferred Lists, Inc.)	
Working Names, Inc.)	
Meyer T. Cohen)	MUR 1542
Heyman Consulting Group, Inc.)	
Victor K. Heyman)	
Thomas L. Mays)	

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GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter involves two complaints filed by the National Conservative Political Action Committee ("NCPAC") alleging violations of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. These complaints alleged that the American Printing House for the Blind ("the Printing House") and the Republican National Committee ("the RNC") solicited contributions from a pseudonym submitted by NCPAC to the Reports Analysis Division pursuant to 2 U.S.C. § 438(a)(4). NCPAC stated further in these allegations that Working Names, Inc. and Meyer T. Cohen, an officer of Working Names, had rented the list containing the pseudonym to the solicitors, and that the RNC obtained the list from Preferred Lists, Inc., a list broker.

On July 15, 1983, the Commission found no reason to believe that the Printing House and the RNC violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. The Commission, however, found reason to believe that Working Names and Preferred Lists violated those sections of the Act and Regulations and sent questions to the respondents.

In response to the questions, counsel for Working Names disclosed both orally and in writing that the list owners are

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Victor K. Heyman and the Heyman Consulting Group, Inc. ("Heyman Consulting") and Thomas L. Mays. According to the responses, Mr. Mays went to various Secretaries of State's offices and performed the actual name-gathering while Mr. Heyman performed the computer processing of the names.

Preferred Lists maintained that it was "told [by Mr. Cohen] that the origin of the list was Secretary of State names obtained legally and legally available for fundraising purposes."

Preferred Lists claimed that it had done business with Working Names for at least three years and had "probably placed 100 list orders with Working Names, Inc." The respondent had stated prior to the RTB finding that it had acted "in good faith" with no knowledge of "any potential wrongdoing." Linda Fisher, president of Preferred Lists, asserted in a phone conversation with an OGC staff member that her firm never saw the list in question.

On February 7, 1984, the Commission found reason to believe that Meyer Cohen, Thomas L. Mays, and Victor K. Heyman and the Heyman Consulting Group, Inc. violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. The investigation proceeded further with replies from the new respondents and communications by this Office with the state offices visited by Mr. Mays. On October 2, 1984, this Office received a letter from respondents' counsel requesting pre-probable cause conciliation. On October 30, the Commission voted to approve entering into pre-probable cause conciliation and to approve draft conciliation proposals. After a meeting between respondents' counsel and OGC staff members,

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respondents' counsel sent in signed proposals which this Office received on November 30, 1984.

II. LEGAL ANALYSIS

A. Proposed Conciliation Agreement

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B. Preferred Lists, Inc.

Although Preferred Lists is a broker, active in the mailing list industry and was, in a technical sense, involved in the commercial use of a name obtained unlawfully, it is difficult to draw a legal conclusion that there is no probable cause to believe that Preferred Lists violated the Act. The responses of Preferred List, however, indicates that it had done business with Working Names for a number of years and did not have reason to suspect that the list was unlawful in origin. Furthermore, as is the usual case with brokers in the mailing list industry,

Preferred Lists never saw a copy of the list in question. Based on the evidence presented, the Office of the General Counsel recommends that the Commission take no further action with respect to Preferred Lists, Inc.

III. RECOMMENDATIONS

1. Approve the attached conciliation proposals.
2. Take no further action with respect to Preferred Lists, Inc.
3. Approve the attached letters.
4. Close the file in this matter.

Charles N. Steele
General Counsel

Dec. 20, 1984
Date

By: 
Kenneth A. Gross
Associate General Counsel

Attachments

1. Conciliation proposal signed by Thomas L. Mays
2. Conciliation proposal signed by Victor K. Heyman
3. Conciliation proposal signed by Meyer T. Cohen
4. Proposed letter to counsel for Mays, Heyman, and Cohen
5. Proposed letter to Preferred Lists, Inc.

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

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

DATE: DECEMBER 26, 1984

SUBJECT: OBJECTION - MUR 1542 General Counsel's
Report signed December 20, 1984

The above-named document was circulated to the
Commission on Friday, December 21, 1984 at 2:00.

Objections have been received from the Commissioners
as indicated by the name(s) checked:

Commissioner Aikens _____
Commissioner Elliott _____
Commissioner Harris _____
Commissioner McDonald _____
Commissioner McGarry _____
Commissioner Reiche X (comments attached)

This matter will be placed on the Executive Session
agenda for Tuesday, January 8, 1985.

33040574891

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Preferred Lists, Inc.)
Working Names, Inc.) MUR 1542
Meyer T. Cohen)
Heyman Consulting Group, Inc.)
Victor K. Heyman)
Thomas L. Mays)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of January 8, 1985, do hereby certify that the Commission took the following actions in MUR 1542:

1. Decided by a vote of 5-0 to amend the proposed conciliation agreements attached to the General Counsel's December 20, 1984 report as follows:

Commissioners Elliott, Harris, McDonald, McGarry, and Reiche voted affirmatively for the decision; Commissioner Aikens was not present at the time of the vote.

(continued)

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2. Decided by a vote of 5-0 to

- a) Approve the conciliation agreements attached to the General Counsel's report dated December 20, 1984, subject to amendment as noted above.
- b) Take no further action with respect to Preferred Lists, Inc.
- c) Direct the Office of General Counsel to send appropriate letters pursuant to these decisions.

Commissioners Elliott, Harris, McDonald, McGarry, and Reiche voted affirmatively for this decision; Commissioner Aikens was not present at the time of the vote.

Attest:

1-9-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 10, 1985

Linda L. Fisher, President
Preferred Lists, Inc.
499 South Capitol Street, S.W.
Suite 504
Washington, D.C. 20003

Re: MUR 1542
Preferred Lists, Inc.

Dear Ms. Fisher:

On July 15, 1983, the Federal Election Commission determined that there was reason to believe that your company, Preferred Lists, Inc., violated 2 U.S.C. § 438(a)(4), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), and 11 C.F.R. § 104.15, a provision of the Commission Regulations. Upon making this finding, the Commission instituted an investigation of this matter.

After considering the circumstances of this matter, the Commission has decided to take no further action and close its file in this matter. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that the sale or commercial use of contributor information filed with the Federal Election Commission is in violation of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. If you have any questions, please contact Jonathan Levin, the attorney assigned to this matter, at 202-523-4000.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
General Counsel's Report

89040574894



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 10, 1985

Matthew S. Watson, Esquire
1825 K Street, N.W.
Suite 720
Washington, D.C. 20006

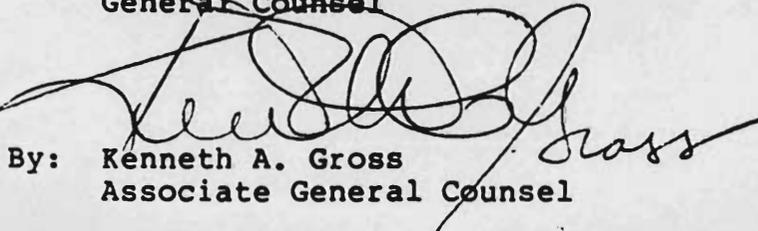
Re: MUR 1542

Dear Mr. Watson:

Pursuant to your conversation on January 8, 1985, with Jonathan Levin of the Office of General Counsel, we have enclosed conciliation proposals for the resolution of this matter.

Sincerely,

Charles N. Steele
General Counsel

A handwritten signature in cursive script, appearing to read "Kenneth A. Gross".

By: Kenneth A. Gross
Associate General Counsel

Enclosures
Conciliation proposals (3)

830440674895

LAW OFFICES OF
MATTHEW S. WATSON
SUITE 720
1825 K STREET, N.W.
WASHINGTON, D.C. 20006
(202) 331-7540

February 5, 1985

Jonathan Levin, Esq.
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20464

Re: Heyman Consulting
Group, Inc.
Victor K. Heyman
MUR 1542

Dear Mr. Levin:

Enclosed is the signed conciliation
agreement submitted on behalf of the above-
named parties.

Sincerely,



Matthew S. Watson

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ACC# 6287

EPSTEIN BECKER BORSODY & GREEN, P.C.

ATTORNEYS AT LAW

1140 19TH STREET, N.W.

WASHINGTON, D. C. 20036

(202) 861-0900

250 PARK AVENUE
NEW YORK, NEW YORK 10177
(212) 370-9800

MALICK TOWER
ONE SUMMIT AVENUE
FORT WORTH, TEXAS 76102[†]
(817) 334-0701

1875 CENTURY PARK EAST
LOS ANGELES, CALIFORNIA 90067[†]
(213) 556-8881

FOUR EMBARCADERO
SAN FRANCISCO, CALIFORNIA 94111[†]
(415) 398-5565

[†]P.C. IN NEW YORK AND
WASHINGTON, D.C. ONLY

February 27, 1985

Jonathan Levin, Esquire
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C.

Re: MUR 1542

Dear Mr. Levin: *Jonathan*

Enclosed please find Statements of Designation of
Counsel in MUR 1542 for Respondents Meyer Cohen, President
of Working Names, Inc., and Thomas Mays.

Very truly yours,



Leslie J. Kerman

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10:20
02:01

STATEMENT OF DESIGNATION OF COUNSEL - MUR 1542

NAME OF COUNSEL: Leslie J. Kerman, Esquire
William C. Oldaker, Esquire
Epstein Becker Borsody & Green, P.C.

ADDRESS: 1140 19th Street, N.W.
Suite 900
Washington, D.C. 20036

TELEPHONE: (202)-861-0900

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.

2-15-85
Date

Thomas Mays
Signature

NAME: Thomas Mays

ADDRESS: 1202 Potomac Street, N.W.
Washington, D.C. 20007

HOME PHONE:

BUSINESS PHONE: (202) 298-9206

83040674899

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
)	
Heyman Consulting Group, Inc.)	MUR 1542
Victor K. Heyman)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND AND ANALYSIS

On October 30, 1984, the Commission voted to approve entering into pre-probable cause conciliation with Thomas L. Mays, with Working Names, Inc. and Meyer T. Cohen, and with the Heyman Consulting Group, Inc. and Victor K. Heyman. After a meeting between respondents' counsel and OGC staff members, respondents' counsel sent in signed proposals which this office received on November 30, 1984.

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on February 5, 1985, respondents' counsel returned a conciliation proposal amended according to the Commission's determination and signed by Victor K. Heyman for himself and the Heyman Consulting Group, Inc. Thomas L. Mays and Working Names, Inc. and Meyer T. Cohen have decided not to sign the proposals pertaining to them. Therefore, this Office will proceed to the next enforcement stage with respect to the latter three respondents.

II. RECOMMENDATIONS

1. Approve the attached conciliation proposal.
2. Close the file with regard to the Heyman Consulting Group, Inc. and Victor K. Heyman.
3. Approve the attached letter.

Charles N. Steele
General Counsel

February 26, 1985
Date

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

Attachments

1. Conciliation proposal signed by Victor K. Heyman
2. Proposed letter to counsel for the Heyman Consulting Group, Inc. and Victor K. Heyman.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Heyman Consulting Group, Inc.) MUR 1542
Victor K. Heyman)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 1, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 1542:

1. Approve the conciliation proposal submitted with the General Counsel's Report signed February 26, 1985.
2. Close the file with regard to the Heyman Consulting Group, Inc. and Victor K. Heyman.
3. Approve the letter attached to the General Counsel's Report signed February 26, 1985.

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

Attest:

2-4-85
Date

Marjorie W Emmons
Marjorie W. Emmons
Secretary of the Commission

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

2-27-85, 12:21
2-27-85, 4:00

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 6, 1985

Matthew S. Watson, Esquire
1825 K Street, N.W.
Suite 720
Washington, D.C. 20006

RE: MUR 1542
Heyman Consulting Group, Inc.
Victor K. Heyman

Dear Mr. Watson:

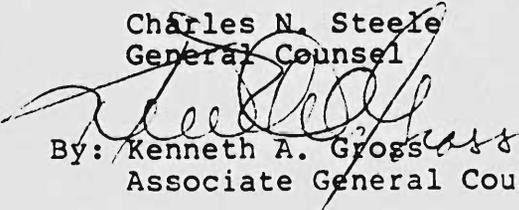
On March 1, 1985, the Commission accepted the conciliation agreement signed by Victor K. Heyman in settlement of a violation of 2 U.S.C. § 438(a)(4), a provision of the Federal Election Campaign Act of 1971, as amended, and 11 C.F.R. § 104.15, a provision of the Commission Regulations. Accordingly, the file has been closed in this matter as it pertains to Victor K. Heyman and the Heyman Consulting Group, Inc., and it will become a part of the public record within thirty days after this matter has been closed with respect to all other respondents involved. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing within 10 days.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

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

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
 Heyman Consulting Group, Inc.) MUR 1542
 Victor K. Heyman)

SEP 8 11:29

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by the National Conservative Political Action Committee. The Commission found reason to believe that Heyman Consulting Group, Inc. and Victor K. Heyman ("Respondents") violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15 by producing and offering commercially a list containing a name obtained from reports of contributions on file at the Federal Election Commission and an investigation was conducted.

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

I. The Commission has jurisdiction over the Respondents, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

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

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

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

1. Respondent Heyman Consulting Group, Inc. is a list owner and performs computer processing of list material,

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e.g. entering the names which it receives onto computer tapes and duplicating the tapes or producing mailing labels from the tape information.

2. Victor K. Heyman is president of Heyman Consulting Group, Inc.

3. Respondents are owners along with Thomas L. Mays of a mailing list known as "Truly Conservative Contributors."

4. "Truly Conservative Contributors" was advertised and marketed for the Respondents and Mr. Mays by Working Names, Inc. and Meyer T. Cohen. The list was advertised and marketed to organizations soliciting by mail for contributions.

5. Working Names, Inc. and Meyer T. Cohen rented portions of "Truly Conservative Contributors" to two organizations. Five thousand names were rented to one organization and twenty thousand names were rented to another organization.

6. The portions rented to the two organizations contained a single contributor's name and address listed in a report filed by NCPAC with the Commission. This name was also included on a pseudonym list filed by NCPAC with the Commission in order to protect against the illegal use of names and addresses of contributors.

7. The two organizations that rented the lists each solicited contributions from the contributor name referred to above in paragraph IV, 6.

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8. Section 438(a)(4) of Title 2, United States Code, and section 104.15 of Title II, Code of Federal Regulations, states that no information copied from reports or statements filed with the Federal Election Commission may be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

V. Respondents acknowledge that use for commercial purposes of a name copied from a report filed at the Federal Election Commission violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.

VI. Respondents collectively will pay a civil penalty to the Treasurer of the United States in the amount of One Thousand Dollars (\$1,000), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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

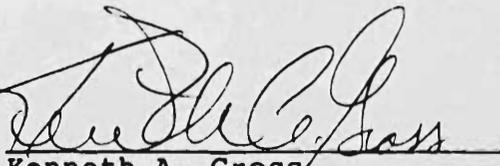
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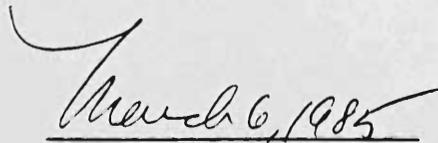
X. Respondents shall make a payment of \$500 of the civil penalty to the Treasurer of the United States within thirty (30) days of the effective date of the agreement. Respondents shall pay the remaining \$500 of the civil penalty to the Treasurer of the United States within sixty (60) days of the effective date of this agreement.

XI. This Conciliation Agreement constitutes the entire agreement between the Commission and Respondents on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by any party or by agents of any party to this written agreement that is not contained in this written agreement shall be valid.

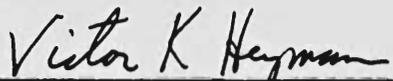
FOR THE COMMISSION:

Charles N. Steele
General Counsel

By: 
Kenneth A. Gross
Associate General Counsel


Date

FOR THE RESPONDENTS:


Victor K. Heyman, President
Heyman Consulting Group, Inc.

Feb 2, 1985
Date

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RECEIVED AT THE FEC

85 MAR 29 10:18

LAW OFFICES OF
MATTHEW S. WATSON
1914 SUNDERLAND PLACE, N.W.
WASHINGTON, D.C. 20036

ALSO ADMITTED IN NEW YORK

(202) 293-0224

March 28, 1985

Jonathan Levin, Esq.
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20464

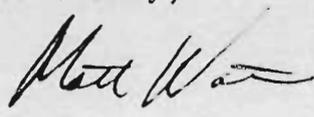
Re: Heyman Consulting Group, Inc.
Victor K. Heyman
MOR 1542

5 MAR 29 11:19

Dear Mr. Levin:

Enclosed on behalf of Heyman Consulting Group, Inc. and Victor K. Heyman is the corporation's check in the amount of \$500, representing the first payment pursuant to the conciliation agreement in the above matter.

Sincerely,



Matthew S. Watson

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SENSITIVE



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MAY 8 10:49

May 8, 1985

MEMORANDUM

TO : The Commission

FROM : Charles N. Steele
General Counsel *CNS*

SUBJECT: MUR 1542

Attached for the Commission's review are briefs stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of these briefs and a letter notifying the respondents' counsel of the General Counsel's intent to recommend to the Commission findings of probable cause to believe were mailed on May 8, 1985. Following receipt of the respondents' replies to these notices, this Office will make a further report to the Commission.

Attachments

1. Briefs
2. Letters to attorney for respondents

390406/4907



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 8, 1985

Leslie J. Kerman, Esquire
Epstein, Becker, Borsody and
Green, P.C.
1140 Nineteenth Street, N.W.
Washington, D.C. 20036

RE: MUR 1542
Working Names, Inc.
Meyer T. Cohen
Thomas L. Mays

Dear Ms. Kerman:

Based on complaints filed with the Commission on April 4, 1983, and information supplied by Meyer T. Cohen, the Commission determined, on July 12, 1983, that there was reason to believe that Working Names, Inc. violated 2 U.S.C. § 438(a)(4), a provision of the Federal Election Campaign Act of 1971, as amended, and 11 C.F.R. § 104.15, a provision of the Commission's Regulations, and instituted an investigation of this matter. Based on information received during the investigation, the Commission, on February 7, 1984, found reason to believe that Mr. Cohen and Thomas L. Mays also violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review are briefs stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the briefs of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel, if possible). The General Counsel's briefs and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

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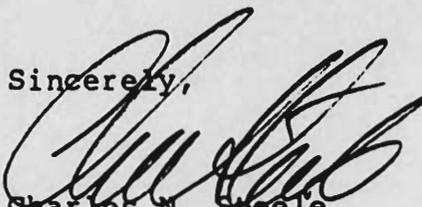
Leslie J. Kerman, Esquire
Page 2

If you are unable to file a responsive brief within fifteen days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond twenty days.

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than thirty, but not more than ninety, days to settle this matter through a conciliation agreement.

Should you have any questions, please contact Jonathan Levin, the attorney assigned to handle this matter, at (202) 523-4000.

Sincerely,



Charles W. Steele
General Counsel

Enclosure
Briefs (2)

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1542
Working Names, Inc.)
Meyer T. Cohen)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

This matter involves complaints filed by the National Conservative Political Action Committee ("NCPAC") alleging violations of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.

On April 4, 1983, the General Counsel received a complaint from counsel for the National Conservative Political Action Committee stating that American Printing House for the Blind ("the Printing House") had sent a fundraising letter to one of the pseudonyms submitted by NCPAC to the Reports Analysis Division, and that violations of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15 had occurred. NCPAC stated that its own investigation revealed that a list containing the pseudonym was rented to the Printing House by Working Names, Inc. ("Working Names"). NCPAC further alleged that Meyer T. Cohen, an officer of Working Names, had admitted that Working Names rented the list to the Printing House. The complaint also stated that Mr. Cohen claimed that he was merely the broker for the list, but he refused to disclose the identities of the list owners. Finally, the complaint alleged that Mr. Cohen admitted that some of the names on the list came from filings with certain Secretaries of State. This complaint was subsequently numbered as MUR 1541.

Attachment 1 - p. 1 of 13

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Also on April 4, this Office received a second complaint from NCPAC referencing the first complaint and stating that the Republican National Committee ("the RNC") had sent a fundraising letter to the same pseudonym. NCPAC alleged that the RNC received its list from Preferred Lists. The complaint further claimed that Preferred Lists stated that Working Names provided them with the list. This complaint was subsequently numbered as MUR 1542.

In response to the complaint, Meyer Cohen of Working Names admitted that his company has the pseudonym, and he sent us the portion of the list containing the pseudonym. He stated that Working Names is a list management company representing two owners of the list and that the two owners compiled the list in "a legally acceptable manner." Mr. Cohen proceeded to state that the pseudonym or "decoy" submitted by NCPAC may not be a "true decoy" in that it may be obtainable from some source other than reports filed with the Commission or with Secretaries of State.

Research of this Office revealed that the pseudonym was not the only example of a name from the list coinciding with NCPAC reports. The list portion sent to this Office by Mr. Cohen contained 212 names. After checking those names against a list of 1982 contributors to NCPAC, it appeared that approximately 14 percent of the names on the list portion submitted by Mr. Cohen also appeared on the NCPAC reports filed with the Commission for 1982.

1 - p. 2 of 13

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On July 12, 1983, the Commission found reason to believe that Working Names violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. The Commission also approved interrogatories to be sent to Working Names.

In a meeting with counsel for Working Names on August 3, 1983, and in a letter received from Meyer T. Cohen, President of Working Names, on August 12, 1983, it was revealed that the list owners are Victor K. Heyman and Heyman Consulting Group, Inc. ("Heyman Consulting") of Rockville, Maryland, and Thomas L. Mays of Washington, D.C. Mr. Cohen's response indicated that the functions of the participants dealing with the list were divided as follows: Working Names advertised and marketed the list and received payment from the list users. Victor Heyman and Heyman Consulting performed computer processing of the list material, entering the names which they received onto computer tapes and duplicating the tapes or producing mailing labels from the tape information. Mr. Mays obtained the names themselves. According to oral representations by counsel and Meyer Cohen's written response, Mr. Mays traveled to the various offices of the Secretaries of State and obtained the filings made for state and local elections and did not "knowingly" use any material required by federal law to be filed with a Secretary of State. In addition, in his written response, Mr. Cohen maintained that NCPAC filings were made on computer printouts and, if a NCPAC form were filed incorrectly by a Secretary of State, "it would not be immediately apparent that a restricted federal form had been

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1-p. 3 of 13

obtained." Mr. Cohen's response further stated that, "[d]ue to the large volume of material handled, after entry of a name onto computer tape, the underlying document is not maintained," and, therefore, the source of the "alleged decoy" cannot be determined.

This Office contacted the Boards of Election in Virginia and Maryland and was told that reports for state committees and federal political committees are kept in separate files and segregated from one another. Based upon this information, this Office, with the Commission's approval, sent a letter, on October 3, 1983, to the complainant asking it if it had included the solicited pseudonym on any list or report other than the report of contributors submitted to the Commission. On October 18, NCPAC replied that the pseudonym "was not used by NCPAC on any report or list of names filed with any agency other than the Federal Election Commission."

On February 7, 1984, the Commission found reason to believe that Meyer Cohen violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.

On March 15, 1984, counsel for the respondents replied that the use of only one pseudonym was discovered and that this indicated that any violation by his client is not ongoing. Counsel also repeated his explanation that the use of any NCPAC names may have resulted from misfiling at the office of a secretary of state. In an affidavit submitted along with counsel's response, Mr. Mays listed the offices of the secretary

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1-p. 4 of 13

of state in eight states as the sources of the list, "Truly Conservative Contributors."

On May 10, 1984, this Office sent questions to these eight offices inquiring as to the process by which members of the public may review or receive copies of political campaign finance reports and as to whether and how state reports are separated from federal reports. Procedures differ from state to state. All but one of the states separate state filings from federal filings. This is done by having a separate state office for the receipt of filings for state candidacies, by separate filing rooms, or by separate, clearly marked cabinets. The Florida Secretary of State's office stated that it does not separate federal and state files in the above manner. It also stated that NCPAC files reports in computerized form and does not separate federal and state activity.

II. LEGAL ANALYSIS

Section 438(a)(4) of Title 2 and section 104.15 of the Commission's Regulations provide that any information copied from filed reports may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of a political committee to solicit contributions from such committee. Section 104.15(a) includes reports filed with Secretaries of State within the prohibition.

The appearance of the pseudonym in the list offered by Working Names, Inc. and Meyer T. Cohen is strong evidence that the

1-p. 5 of 13

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list was compiled from prohibited sources. Furthermore, the responses of the state offices maintaining the reports from which the names were obtained reveal that sufficient care was not exercised in compiling the list. Two of the offices used, the Alaska Lieutenant Governor's Office and the Louisiana Secretary of State's Office, maintain reports only of federal candidates and committees. Respondents have posed the defense that they used only non-federal reports. It is apparent from the information as to the state offices used that sufficient care or sufficient regard for the provisions of the Act and Regulations was not exercised by Mr. Mays.

The responses of Mr. Mays and Mr. Heyman after the reason to believe finding against Mr. Cohen indicate that Mr. Mays was the only provider of names for the list in question and that this list was prepared for marketing as a result of a working relationship among Mr. Mays, Mr. Heyman, and Mr. Cohen. In a meeting with this Office in August, 1984, counsel for Working Names, Inc. and Mr. Cohen indicated that there is an ongoing working relationship among these three men. It appears, therefore, that Working Names, Inc. and Mr. Cohen were integrally involved in the activity which violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. Based on the foregoing analysis, the General Counsel recommends that the Commission find probable cause to believe that Working Names, Inc. and Meyer T. Cohen violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.

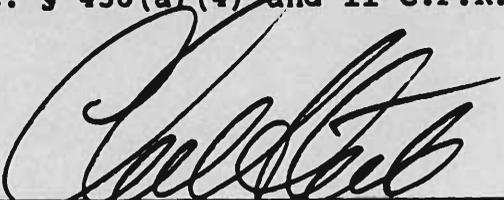
1 - p. 6 of 13

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III. RECOMMENDATION

Find probable cause to believe that Working Names, Inc. and Meyer T. Cohen violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.

4 May 1985
Date



Charles N. Steele
General Counsel

93040574918

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1542
Thomas L. Mays)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

This matter involves complaints filed by the National Conservative Political Action Committee ("NCPAC") alleging violations of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.

On April 4, 1983, the General Counsel received a complaint from counsel for the National Conservative Political Action Committee stating that American Printing House for the Blind ("the Printing House") had sent a fundraising letter to one of the pseudonyms submitted by NCPAC to the Reports Analysis Division, and that violations of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15 had occurred. NCPAC stated that its own investigation revealed that a list containing the pseudonym was rented to the Printing House by Working Names, Inc. ("Working Names"). NCPAC further alleged that Meyer T. Cohen, an officer of Working Names, had admitted that Working Names rented the list to the Printing House. The complaint also stated that Mr. Cohen claimed that he was merely the broker for the list, but he refused to disclose the identities of the list owners. Finally, the complaint alleged that Mr. Cohen admitted that some of the names on the list came from filings with certain Secretaries of State. This complaint was subsequently numbered as MUR 1541.

1 - p. 8 of 13

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Also on April 4, this Office received a second complaint from NCPAC referencing the first complaint and stating that the Republican National Committee ("the RNC") had sent a fundraising letter to the same pseudonym. NCPAC alleged that the RNC received its list from Preferred Lists. The complaint further claimed that Preferred Lists stated that Working Names provided them with the list. This complaint was subsequently numbered as MUR 1542.

In response to the complaint, Meyer Cohen of Working Names admitted that his company has the pseudonym, and he sent us the portion of the list containing the pseudonym. He stated that Working Names is a list management company representing two owners of the list and that the two owners compiled the list in "a legally acceptable manner." Mr. Cohen proceeded to state that the pseudonym or "decoy" submitted by NCPAC may not be a "true decoy" in that it may be obtainable from some source other than reports filed with the Commission or with Secretaries of State.

Research of this Office revealed that the pseudonym was not the only example of a name from the list coinciding with NCPAC reports. The list portion sent to this Office by Mr. Cohen contained 212 names. After checking those names against a list of 1982 contributors to NCPAC, it appeared that approximately 14 percent of the names on the list portion submitted by Mr. Cohen also appeared on the NCPAC reports filed with the Commission for 1982.

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1-p. 9 of 13

On July 12, 1983, the Commission found reason to believe that Working Names violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. The Commission also approved interrogatories to be sent to Working Names.

In a meeting with counsel for Working Names on August 3, 1983, and in a letter received from Meyer T. Cohen, President of Working Names, on August 12, 1983, it was revealed that the list owners are Victor K. Heyman and Heyman Consulting Group, Inc. ("Heyman Consulting") of Rockville, Maryland, and Thomas L. Mays of Washington, D.C. Mr. Cohen's response indicated that the functions of the participants dealing with the list were divided as follows: Working Names advertised and marketed the list and received payment from the list users. Victor Heyman and Heyman Consulting performed computer processing of the list material, entering the names which they received onto computer tapes and duplicating the tapes or producing mailing labels from the tape information. Mr. Mays obtained the names themselves. According to oral representations by counsel and Meyer Cohen's written response, Mr. Mays traveled to the various offices of the Secretaries of State and obtained the filings made for state and local elections and did not "knowingly" use any material required by federal law to be filed with a Secretary of State. In addition, in his written response, Mr. Cohen maintained that NCPAC filings were made on computer printouts and, if a NCPAC form were filed incorrectly by a Secretary of State, "it would not be immediately apparent that a restricted federal form had

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been obtained." Mr. Cohen's response further stated that, "[d]ue to the large volume of material handled, after entry of a name onto computer tape, the underlying document is not maintained," and, therefore, the source of the "alleged decoy" cannot be determined.

This Office contacted the Boards of Election in Virginia and Maryland and was told that reports for state committees and federal political committees are kept in separate files and segregated from one another. Based upon this information, this Office, with the Commission's approval, sent a letter, on October 3, 1983, to the complainant asking it if it had included the solicited pseudonym on any list or report other than the report of contributors submitted to the Commission. On October 18, NCPAC replied that the pseudonym "was not used by NCPAC on any report or list of names filed with any agency other than the Federal Election Commission."

On February 7, 1984, the Commission found reason to believe that Thomas L. Mays violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15 and approved interrogatories to be sent to Mr. Mays.

On March 15, 1984, counsel for Mr. Mays replied that the use of only one pseudonym was discovered and that this indicated that any violation by his client is not ongoing. Counsel also repeated his explanation that the use of any NCPAC names may have resulted from misfiling at the office of a secretary of state. In an affidavit submitted along with counsel's response, Mr. Mays listed the offices of the secretary of state in eight

1- p. 11 of 13

83040674922

states as the sources of the list, "Truly Conservative Contributors."

On May 10, 1984, this Office sent questions to these eight offices inquiring as to the process by which members of the public may review or receive copies of political campaign finance reports and as to whether and how state reports are separated from federal reports. Procedures differ from state to state. All but one of the states separate state filings from federal filings. This is done by having a separate state office for the receipt of filings for state office, by separate filing rooms, or by separate, clearly marked cabinets. The Florida Secretary of State's office stated that it does not separate federal and state files in the above manner. It also stated that NCPAC files reports on computerized form and does not separate federal and state activity.

II. LEGAL ANALYSIS

Section 438(a)(4) of Title 2 and section 104.15 of the Commission's Regulations provide that any information copied from filed reports may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of a political committee to solicit contributions from such committee. Section 104.15(a) includes reports filed with Secretaries of State within the prohibition.

The appearance of the pseudonym in the list offered by Working Names, Inc. and Meyer T. Cohen is strong evidence that

1 - p. 12 of 13

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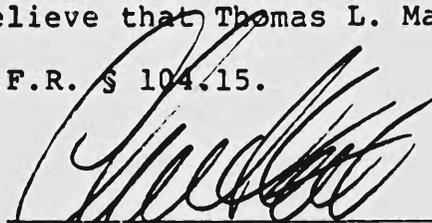
the list was compiled from prohibited sources. Furthermore, the responses of the state offices maintaining the reports from which the names were obtained reveal that sufficient care was not exercised in compiling the list. Two of the offices used, the Alaska Lieutenant Governor's Office and the Louisiana Secretary of State's Office, maintain reports only of federal candidates and committees. Mr. Mays has posed the defense that he used only non-federal reports. It is apparent from the information as to the state offices used that sufficient care or sufficient regard for the provisions of the Act and Regulations was not exercised by Mr. Mays.

Based on the foregoing analysis, the General Counsel recommends that the Commission find probable cause to believe that Thomas L. Mays violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.

III. RECOMMENDATION

Find probable cause to believe that Thomas L. Mays violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.

7 May 1965
Date



Charles N. Steele
General Counsel

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LAW OFFICES OF
MATTHEW S. WATSON
1514 SUNDERLAND PLACE, N.W.
WASHINGTON, D.C. 20036

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ALSO ADMITTED IN NEW YORK

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May 14, 1985

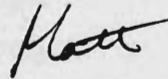
Jonathan Levin, Esq.
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20464

Re: Heyman Consulting Group, Inc.
Victor K. Heyman
MUR 1542

Dear Mr. Levin:

Enclosed on behalf of Heyman Consulting Group, Inc. and Victor K. Heyman is the corporations check in the amount of \$500, representing the final payment pursuant to the conciliation agreement in the above-matter.

Sincerely,



Matthew S. Watson

38040574925

GGC # 7576

EPSTEIN BECKER BORSODY & GREEN, P.C.
ATTORNEYS AT LAW

250 PARK AVENUE
NEW YORK, NEW YORK 10177
(212) 370-9800

1140 19TH STREET, N.W.
WASHINGTON, D. C. 20036
(202) 861-0900

1875 CENTURY PARK EAST
LOS ANGELES, CALIFORNIA 90067
(213) 586-8861

MALICK TOWER
ONE SUMMIT AVENUE
FORT WORTH, TEXAS 76102
(817) 334-0701

FOUR EMBARCADERO
SAN FRANCISCO, CALIFORNIA 94111
(415) 398-5566

P.C. IN NEW YORK AND
WASHINGTON, D.C. ONLY

May 24, 1985

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

RECEIVED
MAY 27 1985
P 4: 57

RE: Federal Election Commission - MUR 1542
Respondents - Working Names, Inc., Meyer T.
Cohen, and Thomas L. Mays

Dear Mr. Levin: *Jonathan*

As we discussed, our office received notification of the General Counsel's probable cause recommendation, along with its supporting brief, in the above-captioned matter on May 13, 1985. A reply brief is currently due to be filed with the Commission on May 31, 1985. See 11 C.F.R. § 111.2(a) and (c).

We hereby request a twenty day extension of time, from May 31, 1985 to June 20, 1985, in which to file our reply brief in this complaint. As new counsel to Respondents, this extension of time is necessary for us to be able to gather pertinent information and to fully and adequately brief our position. In particular, this additional time is required for us to be able to provide the Commission with significant, new information with respect to this matter.

If you have any questions regarding this request, please do not hesitate to contact me.

Sincerely,

Leslie

Leslie J. Kerman
Counsel for Respondents

LJK:ses

83040674926



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 30, 1985

Leslie J. Kerman, Esquire
Epstein, Becker, Borsody & Green, P.C.
1140 19th Street, N.W.
Washington, D.C. 20036

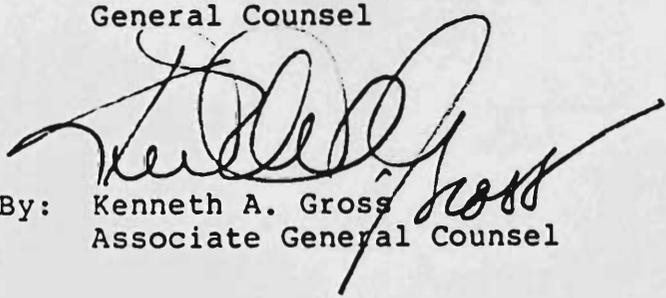
Re: MUR 1542
Thomas L. Mays
Working Names, Inc.
Meyer T. Cohen

Dear Ms. Kerman:

On May 24, 1985, this Office received your request for an extension of time in which to respond to the probable cause briefs in the above-captioned matter. This Office declines to grant any extension of time. The reply briefs in this matter are, therefore, due at the Commission on May 31, 1985.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

830405/4927

GC#742A

EPSTEIN BECKER BORSODY & GREEN, P.C.

ATTORNEYS AT LAW

1140 19TH STREET, N.W.

WASHINGTON, D. C. 20036

(202) 661-0900

250 PARK AVENUE
NEW YORK, NEW YORK 10177
(212) 370-11800

MALLICK TOWER
ONE SUMMIT AVENUE
FORT WORTH, TEXAS 76102
(817) 334-0701

1875 CENTURY PARK EAST
LOS ANGELES, CALIFORNIA 90067
(213) 556-8861

FOUR EMBARCADERO
SAN FRANCISCO, CALIFORNIA 94111
(415) 398-5565

P.C. IN NEW YORK AND
WASHINGTON, D.C. ONLY

June 6, 1985

Mr. John Warren McGarry, Chairman
Commission
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1542 - Respondents, Working Names, Inc.,
Meyer T. Cohen and Thomas L. Mays

Dear Commissioner McGarry:

This letter concerns our request for an extension of time in which to respond to the General Counsel's probable cause brief in the above-captioned matter. This request for a twenty-day extension, a copy of which is attached hereto, was filed with the Office of General Counsel on May 24, 1985. We received official notification from the General Counsel's Office that no extension of time would be granted on May 31, 1985, the date on which reply briefs were due.

As stated in our letter of May 24, 1985, this extension of time is required for us, as new counsel to Respondents, to be able to provide the Commission with significant, new facts with respect to this matter; facts which we were first made aware of on May 22, 1985, which we are currently in the process of verifying and documenting, and which may entail the revision of the answers to interrogatories previously proffered to the Commission by our clients.

Accordingly, we urge the Commission to grant our requested extension of time, allowing us until June 20, 1985 to respond to the General Counsel's brief in this matter. Under

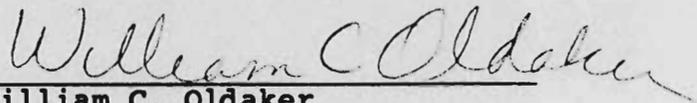
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Mr. John Warren McGarry, Chairman
June 6, 1985
Page Two

the circumstances, any probable cause determination rendered without consideration of the new and highly relevant facts which we are currently verifying would be extremely inequitable.

Sincerely,


William C. Oldaker
Counsel for Respondents


Leslie J. Kerman
Counsel for Respondents

WCO/LJK:ses

(Identical letters, dated June 6, '985,
to Commissioners Aikens, Reiche, Elliott
McDonald and Harris deleted from
Public Record file).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARY

05 JUN 14 A 9:46
June 14, 1985

SENSITIVE

MEMORANDUM TO: The Commission
FROM: Charles N. Steele
General Counsel
By: Kenneth A. Gross
Associate General Counsel
SUBJECT: Request for Extension
MUR 1542
Working Names, Inc.
Meyer T. Cohen
Thomas L. Mays

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By letter of May 24, 1985, counsel for Working Names, Inc., Meyer T. Cohen, and Thomas L. Mays requested an extension of twenty days in which to respond to the General Counsel's Brief in MUR 1542. (See Attachment 1). The letter states that, "[a]s new counsel to Respondents," counsel needed the extension "to be able to gather pertinent information and to fully and adequately brief [respondents'] position." Counsel maintains that more time was required to "provide the Commission with significant, new information" pertaining to the matter.

On May 30, 1985, this Office sent a letter to counsel denying any extension of time for a response. The reasons had been explained to counsel in a phone conversation on the previous day.

On June 6, counsel sent a letter to the Commissioners protesting the denial of an extension. (See Attachment 2). Counsel claims that she was "first made aware of" the new facts needed for a reply on May 22, 1985. Counsel claims that such facts need to be verified and documented and may necessitate revising respondents' answers to previous interrogatories sent by the Commission.

This Office recommends that no further extension be granted and intends to draft a General Counsel's Report immediately. This case has been open for over two years. After a prolonged pre-probable cause conciliation period

the respondents retained present counsel in late February, 1985. Counsel has known the position of this Office in a detailed manner for at

least two months. During conversations with this Office, held a number of weeks prior to the sending of briefs by this Office, counsel for the respondents referred to the "new" facts. As counsel has apparently known about the new information for some time, counsel's request for an extension based on such information does not appear to be justified.

Based on the foregoing, this Office recommends the denial of any further time for the filing of reply briefs by counsel for the respondents.

Recommendations

1. Deny counsel for Working Names, Inc., Meyer T. Cohen, and Thomas L. Mays the extension of any time in which to respond to the General Counsel's Briefs in MUR 1542.
2. Approve and send the attached letter.

Attachments

1. Request for extension
2. Letter to Commissioners protesting the denial of the extension
3. Letter to counsel for respondents

8 8 0 4 0 5 7 4 9 3 1

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Request for Extension) MUR 1542
Working Names, Inc.)
Meyer T. Cohen)
Thomas L. Mays)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 18, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 1542:

1. Deny counsel for Working Names, Inc., Meyer T. Cohen, and Thomas L. Mays the extension of any time in which to respond to the General Counsel's Briefs in MUR 1542.
2. Approve and send the letter attached to the General Counsel's Memorandum dated June 14, 1985.

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

Attest:

6-19-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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

6-14-85, 9:46
6-14-85, 2:00

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 20, 1985

Leslie Kerman, Esquire
Epstein, Becker, Borsody
& Green, P.C.
1140 19th Street, N.W.
Washington, D.C. 20036

Re: MUR 1542
Working Names, Inc.
Meyer T. Cohen
Thomas L. Mays

Dear Ms. Kerman:

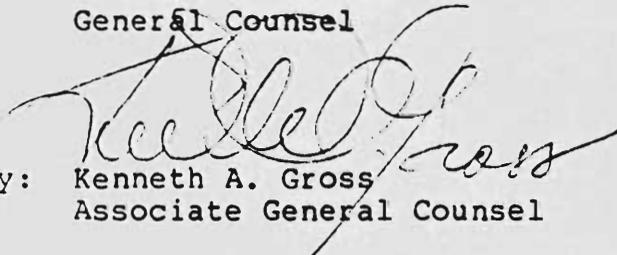
This is in reference to your letters dated May 24, and June 6, 1985, requesting an extension of twenty days until June 20, 1985, to respond to the General Counsel's Briefs in the above captioned matter.

Considering the Commission's responsibilities under 2 U.S.C. § 437g(a)(8)(A) to act expeditiously on complaints and the circumstances of this matter, we cannot agree to your request.

If you have any questions, please contact Jonathan Levin, the attorney handling this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

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SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

In the Matter of)
)
Thomas L. Mays)
Working Names, Inc.)
Meyer T. Cohen)

35 JUL 16 P 4: 05
MUR 1542

EXECUTIVE SESSION
JUL 23 1985

GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter involves two complaints filed by the National Conservative Political Action Committee ("NCPAC") alleging violations of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. These complaints alleged that the American Printing House for the Blind ("the Printing House") and the Republican National Committee ("the RNC") solicited contributions from a pseudonym submitted by NCPAC to the Reports Analysis Division pursuant to 2 U.S.C. § 438(a)(4). NCPAC stated further in these allegations that Working Names, Inc. and Meyer T. Cohen, an officer of Working Names, had rented the list containing the pseudonym to the solicitors, and that the RNC obtained the list from Preferred Lists, Inc., a list broker.

On July 15, 1983, the Commission found no reason to believe that the Printing House and the RNC violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. The Commission, however, found reason to believe that Working Names and Preferred Lists violated those sections of the Act and Regulations and sent questions to the respondents.

In response to the questions, counsel for Working Names disclosed both orally and in writing that the list owners are

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Victor K. Heyman and the Heyman Consulting Group, Inc. ("Heyman Consulting") and Thomas L. Mays. According to the responses, Mr. Mays went to various Secretaries of State's offices and performed the actual name-gathering while Mr. Heyman performed the computer processing of the names.

On February 7, 1984, the Commission found reason to believe that Meyer Cohen, Thomas L. Mays, and Victor K. Heyman and the Heyman Consulting Group, Inc. violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. The investigation proceeded further with replies from the new respondents and communications by this Office with the state offices visited by Mr. Mays. On October 2, 1984, this Office received a letter from respondents' counsel requesting pre-probable cause conciliation. On October 30, the Commission voted to approve entering into pre-probable cause conciliation and to approve draft conciliation proposals. After a meeting between respondents' counsel and OGC staff members, respondents' counsel sent in signed proposals which this Office received on November 30, 1984.

On January 8, 1985, the Commission voted to amend the proposals signed by the respondents and send them back to the respondents for their consideration. On that date, the Commission also voted to take no further action with respect to Preferred Lists, Inc. On March 1, 1985, the Commission voted to accept the amended proposal that was signed by Victor K. Heyman and the Heyman Consulting Group and close the file as to these

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two respondents. On May 8, 1985, this Office sent briefs to new counsel for Mr. Mays and Working Names and Mr. Cohen stating that the General Counsel was prepared to recommend that the Commission find probable cause to believe that the remaining respondents have violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. No reply briefs have been received from counsel.

II. LEGAL ANALYSIS

Reply briefs were not received from counsel. Hence, the General Counsel's legal analysis remains the same, and the Office of the General Counsel recommends that the Commission find probable cause to believe that Thomas L. Mays and Working Names, Inc. and Meyer T. Cohen violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. §§ 104.15.

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

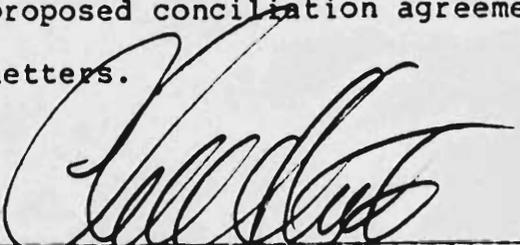
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IV. RECOMMENDATIONS

1. Find probable cause to believe that Thomas L. Mays violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.
2. Find probable cause to believe that Working Names, Inc. and Meyer T. Cohen violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.
3. Approve the attached proposed conciliation agreements.
4. Approve the attached letters.

15 July 1985
Date



Charles N. Steele
General Counsel

Attachments

1. Proposed conciliation agreements
2. Proposed letters to counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Thomas L. Mays) MUR 1542
Working Names, Inc.)
Meyer T. Cohen)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of July 23, 1985, do hereby certify that the Commission decided by a vote of 4-0 to take the following actions in MUR 1542:

1. Find probable cause to believe that Thomas L. Mays violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.
2. Find probable cause to believe that Working Names, Inc. and Meyer to Cohen violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.
3. Approve the proposed conciliation agreements attached to the General Counsel's report dated July 15, 1985.
4. Approve the letters attached to the General Counsel's report dated July 15, 1985.

Commissioners Elliott, Harris, McDonald, and McGarry voted affirmatively for the decision; Commissioners Aikens and Reiche were not present at the time of the vote.

Attest:

7/23/85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 30, 1985

Leslie J. Kerman, Esquire
Epstein, Becker, Borsody and
Green, P.C.
1140 Nineteenth Street, N.W.
Washington, D.C. 20036

RE: MUR 1542
Working Names, Inc.
Meyer T. Cohen
Thomas L. Mays

Dear Ms. Kerman:

On July 23, 1985, the Commission determined that there is probable cause to believe that your clients violated 2 U.S.C. § 438(a)(4), a provision of the Federal Election Campaign Act of 1971, as amended, and 11 C.F.R. § 104.15 a provision of the Commission Regulations, in connection with the commercial use of a name obtained from reports of contributions on file at the Federal Election Commission.

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

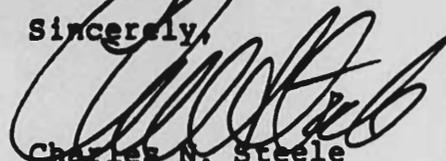
We enclose conciliation agreements that this Office is prepared to recommend to the Commission in settlement of this matter. If your clients agree with the provisions of the enclosed agreements, please have the agreements signed and returned along with the civil penalties to the Commission within ten days. I will then recommend that the Commission approve the agreements. The checks for the civil penalties should be made payable to the U.S. Treasurer.

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Letter to Leslie J. Kerman
Page 2

If you have any questions or suggestions for changes in the enclosed conciliation agreements, please contact Jonathan Levin, the attorney assigned to this matter, at (202) 523-4000.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Conciliation Agreements (2)

8 8 0 4 0 5 7 4 9 4 0



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 15, 1985

August 15, 1985

Leslie Kerman, Esquire
Epstein, Becker, Borsody
& Green
1140 19th Street, N.W.
Washington, D.C. 20036

Re: MUR 1542
Working Names, Inc.
Meyer T. Cohen
Thomas L. Mays

Dear Ms. Kerman:

On August 13, 1985, you indicated in a telephone conversation that you had not received the conciliation proposal concerning Working Names, Inc. and Meyer T. Cohen. According to our records, however, this proposal was mailed to you on July 30, 1985. Enclosed is a copy of the proposal for your convenience.

Sincerely,

Jonathan M. Levin

Jonathan M. Levin

Enclosure
Conciliation proposal

830440674941



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 28, 1985

Leslie Kerman, Esquire
Epstein, Becker, Borsody
& Green, P.C.
1140 19th Street, N.W.
Washington, D.C. 20036

Re: MUR 1542
Working Names, Inc.
Meyer T. Cohen
Thomas L. Mays

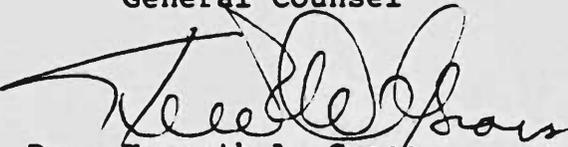
Dear Ms. Kerman:

On July 30, 1985, the Office of the General Counsel sent a letter notifying you that the Commission had found probable cause to believe that your clients had violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. This letter also referred to the enclosure of conciliation proposals and stated that the Commission has a duty to attempt for a period of thirty to ninety days to reach a conciliation agreement with the respondents. Thus far, this Office has received no response from you with respect to the proposals. If a substantive response, i.e., either agreement with the proposals or presentation of counterproposals, is not received by September 6, 1985, this Office will proceed to the next step in the enforcement process and recommend that the Commission file suit in this matter.

If you have any questions, please contact Jonathan Levin at 523-4000.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

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BEFORE THE FEDERAL ELECTION COMMISSION

SECRET

12
1985

In the Matter of
Working Names, Inc.
Meyer T. Cohen
Thomas L. Mays

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)

MUR 1542 P 13 P 3: 18

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On July 29, 1985, the Commission found probable cause to believe that Working Names, Inc., Meyer T. Cohen and Thomas L. Mays violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. §104.15 in connection with the commercial use of names of contributors filed with the Commission. The notification letter to counsel and the conciliation agreements were mailed on July 30, 1985.

During the month of August, this Office receive no substantive response from counsel for the respondents. On August 28, 1985, this Office sent a letter to counsel informing her that this Office had to receive counterproposals by September 6.

This Office received the counterproposals on September 6.

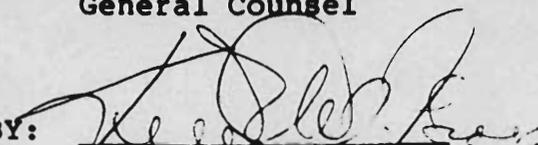
Based upon the foregoing, this Office believes that

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it is worthwhile to continue negotiations for an additional
thirty days.

Charles N. Steele
General Counsel

Sept. 12, 1935
Date

BY: 
Kenneth A. Gross
Associate General Counsel

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85 OCT 10 09:06

LAW OFFICES OF
MATTHEW S. WATSON
1914 SUNDERLAND PLACE, N.W.
WASHINGTON, D.C. 20036

(202) 293-0224

ALSO ADMITTED IN NEW YORK

October 7, 1985

Jonathan Levin, Esq.
Office of General Counsel
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Levin:

As we discussed on the telephone, enclosed is the Complaint, Answer, Counterclaim and Answer to Counterclaim in the Heyman Consulting Group suit against Working Names. In response to a Request for Production of Documents, Working Names indicated that payments were made to John Whitehead with regard to the lists owned by Heyman.

Please call if you require further information.

Sincerely,



Matthew S. Watson

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A10:10

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IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, MARYLAND

HEYMAN CONSULTING GROUP, INC.:
1706 Lorre Drive :
Rockville, Maryland 20852 :

Plaintiff, :

v. :

CAL _____

WORKING NAMES, INC. :
11600 Boiling Brook Place :
Rockville, Maryland 20852 :

[SERVE: Harriet Heyman :
Registered Agent :
10767 Debokeh Drive :
Potomac, MD 20834] :

Defendant. :

COMPLAINT

Heyman Consulting Group, Inc., Plaintiff, by John Perazich, Esq., its attorney, sues Working Names, Inc. for that:

1. Plaintiff, Heyman Consulting Group, Inc. is a Maryland corporation.
2. Defendant, Working Names, Inc., is a Maryland corporation.
3. Heyman Consulting Group, Inc. processes mailing list data in the State of Maryland and is the co-owner of various mailing lists.
4. Working Names, Inc. whose location is in the State of Maryland is a manager and lessor of mailing lists.
5. On or about July, 1982, Plaintiff and Defendant entered into an agreement in the State of Maryland whereby

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Heyman Consulting Group, Inc. would perform computer processing of lists owned by it and Working Names, Inc. would manage and lease said lists. Said agreement provided that Heyman Consulting Group, Inc. would receive Two Cents (2¢) for each name keypunched plus twenty-five percent (25%) of all revenue received by Working Names, Inc. from leasing the subject lists. Payment was due Heyman Consulting Group, Inc. upon receipt of revenue from the subject lists by Working Names, Inc.

COUNT I

(Breach of Contract)

6. Plaintiff incorporates and realleges paragraphs 1 through 5 above.

7. Since July 1982, Defendant has received revenue from leases of the subject lists and has failed to pay Plaintiff sums due and owing to it.

COUNT II

(Conversion)

8. Plaintiff incorporates and realleges paragraphs 1 through 5.

9. Since July 1982, Working Names, Inc., received funds for the account of Heyman Consulting Group, Inc. which it converted to its own use without right or authority.

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COUNT III

(Breach of Fiduciary Duty)

10. Plaintiff incorporates and realleges paragraphs 1 through 5 above.

11. Pursuant to the joint venture entered into by Heyman Consulting Group, Inc. and Working Names, Inc., defendant received funds on behalf of and as trustee for Heyman Consulting Group, Inc.

12. Working Names, Inc. has refused, despite requests from Heyman Consulting Group, Inc., to account for or disgorge funds it holds for Heyman Consulting Group, Inc., as trustee.

COUNT IV

(Fraud)

13. Plaintiff incorporates and realleges paragraphs 1 through 5 above.

14. Since July 1982, Working Names, Inc. has intentionally and with intent to deceive given inaccurate and knowingly false reports as to receipts from leases of mailing lists owned by Heyman Consulting Groups, Inc., as part of a scheme to deprive Heyman Consulting Group, Inc. of funds belonging to it.

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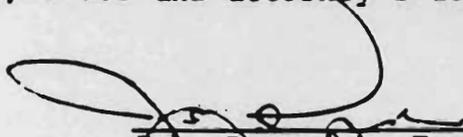
WHEREFORE, Plaintiff demands judgment against Defendants:

(1) For actual damages on Counts I through IV in the amount of \$40,000;

(2) For exemplary damages on Counts II through IV in the amount of \$120,000;

(3) For an accounting of all receipts of revenue from lists owned in whole or in part by plaintiff and managed and leased by defendant; and

(4) For such other amounts as the court deems just and proper, plus interest, costs and attorney's fees.



John Perazich, Esq.
PERAZICH AND WYNN
1914 Sunderland Place, N.W.
Washington, D.C. 20036
(202) 331-7530

STATE OF MARYLAND :

COUNTY OF MONTGOMERY: ss:

I, VICTOR K. HEYMAN, being first duly sworn on oath, state that I am President of the plaintiff corporation authorized to make this verification and the foregoing is a just

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and true statement of the amount owing by defendant to plaintiff exclusive of all set-offs and just grounds of defense.

VICTOR K. HEYMAN

Subscribed and sworn to before me this _____ day of _____, 1985.

Notary Public

My Commission expires: _____

OF COUNSEL:

Matthew S. Watson

Matthew S. Watson, Esq.
1914 Sunderland Place, N.W.
Washington, D.C. 20036
(202) 293-0224

88040574950

IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, MARYLAND

HEYMAN CONSULTING GROUP, INC. :
Plaintiff :
vs. : CAL: 6354
WORKING NAMES, INC. :
Defendant :

ANSWER TO COUNT I

Defendant, Working Names, Inc., by and through its attorney, ANDREW E. BEDERMAN, answers Count I of Plaintiff's Complaint, and states:

1. Defendant generally denies the allegations of Count I of the Complaint.
2. Count I of the Complaint fails to state a cause of action upon which relief can be granted.

WHEREFORE, having fully answered Count I of the Complaint, Defendant prays that Count I be dismissed with costs to the Plaintiff.

Respectfully submitted,

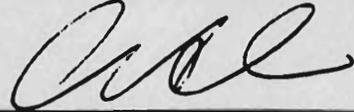


ANDREW E. BEDERMAN
Attorney for Defendant
8701 Georgia Ave., #600
Silver Spring, MD 20910
495-3131

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JURY DEMAND

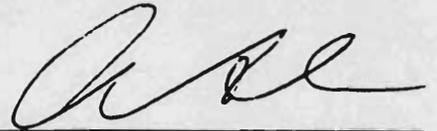
Defendant demands a trial by jury as to all issues.



ANDREW E. BEDERMAN

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that on this 24 day of May, 1985,
I mailed postage prepaid, a copy of the foregoing Answer to John
Perazich, Esquire, 1914 Sunderland Pl., NW, Washington, DC
20036; and to Matthew S. Watson, Esquire, 1914 Sunderland Pl.,
NW, Washington, DC 20036.



ANDREW E. BEDERMAN

88040574952

IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, MARYLAND

HEYMAN CONSULTING GROUP, INC. :
Plaintiff :
vs. : CAL: 6354
WORKING NAMES, INC. :
Defendant :

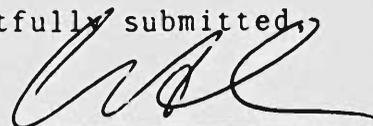
ANSWER TO COUNTS II, III & IV

Defendant, WORKING NAMES, INC., by and through its attorney, ANDREW E. BEDERMAN, answers Counts II, III and IV of Plaintiff's Complaint, and states:

1. Defendant generally denies the allegations of Counts II, III and IV of the Complaint.
2. Counts II, III and IV of the Complaint failed to state a cause of action upon which relief can be granted.
3. Counts II, III and IV of the Complaint are barred by the applicable statute of limitations.

WHEREFORE, having fully answered Counts II, III and IV of the Complaint, Defendant prays that Counts II, III and IV be dismissed with costs to the Plaintiff.

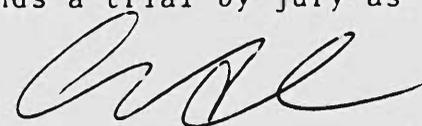
Respectfully submitted,



ANDREW E. BEDERMAN
Attorney for Defendant
8701 Georgia Avenue, Ste. 600
Silver Spring, MD 20910
301/495-3131

JURY DEMAND

Defendant/Counter-Plaintiff demands a trial by jury as to all issues.



ANDREW E. BEDERMAN

28040574955

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Answer to Counts II, III & IV was mailed, postage prepaid to John Perazich, 1914 Sunderland Place, NW, Washington, D.C. 20036 this 9 day of July 1985.



ANDREW E. BEDERMAN

980406/4954

IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, MARYLAND

HEYMAN CONSULTING GROUP, INC. :

Plaintiff/Counter-Defendant:

vs. : CAL: 6354

WORKING NAMES, INC. :

Defendant/Counter-Plaintiff:

COUNTERCLAIM

Defendant and Counter-Plaintiff, Working Names, Inc., by and through its attorney, ANDREW E. BEDERMAN, counterclaims against Plaintiff and Counter-Defendant, Heyman Consulting Group, Inc., and states:

COUNT I
(Breach of Contract)

1. On or about September 1, 1982, Defendant/Counter-Plaintiff and Plaintiff/Counter-Defendant executed the attached contract for exclusive management and rental by Defendant/Counter-Plaintiff of certain mailing lists owned by Plaintiff/Counter-Defendant and known as TRULY CONSERVATIVE CONTRIBUTORS, NICE CONSERVATIVE CONTRIBUTORS, AND COMMITTED LIBERALS.

2. The contract provided, inter alia, that Plaintiff/Counter-Defendant was sole owner of the lists; that the lists had not been obtained by any improper or illegal means; that Plaintiff/Counter-Defendant would indemnify

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Defendant/Counter-Plaintiff with respect to any claim brought on grounds of alleged improper use of the lists or any of the names contained therein, including reasonable attorney's fees; that in the event of termination of the contract, Plaintiff/Counter-Defendant would pay Defendant/Counter-Plaintiff twenty percent (20%) of any rental fees earned by Plaintiff/Counter-Defendant within five (5) years after the termination; and that Defendant/Counter-Plaintiff would receive fifty percent (50%) of all rental fees paid as a result of rental of the lists to any user.

3. Plaintiff/Counter-Defendant breached the contract because Defendant/Counter-Plaintiff discovered on or before January 31, 1985, that the lists contained names which Plaintiff/Counter-Defendant did not own.

4. As a direct and proximate result of Plaintiff/Counter-Defendant's breach of the contract, Defendant/Counter-Plaintiff was required to terminate the contract on or about January 31, 1985; was required to defend a claim made by the Federal Elections Commission for alleged rental of lists containing names not owned by Plaintiff/Counter-Defendant; and lost and will continue to lose monies which Defendant/Counter-Plaintiff reasonably expected to earn pursuant to the contract.

WHEREFORE, Defendant/Counter-Plaintiff demands judgement against Plaintiff/Counter-Defendant for Two Hundred Thousand Dollars (\$200,000.00) plus costs.

290405 / 4956

COUNT II
(Breach of Contract)

5. Defendant/Counter-Plaintiff incorporates the allegations of Count I in this Count II.

6. On or about February, 1984, Plaintiff/Counter-Defendant and Defendant/Counter-Plaintiff agreed that Defendant/Counter-Plaintiff would become exclusive rental manager of another mailing list owned by Plaintiff/Counter-Defendant known as PAID SUBSCRIBERS.

7. Although no written contract was executed, Plaintiff/Counter-Defendant and Defendant/Counter-Plaintiff agreed that their relationship would be governed by and subject to the same terms and conditions set forth in the contract between the parties dated September 1, 1982, which is more fully described in Count I hereof.

8. Plaintiff/Counter-Defendant breached the contract on or before June 13, 1984, when Plaintiff/Counter-Defendant provided the list to another person or entity for rental management.

9. As a direct and proximate result of Plaintiff/Counter-Defendant's breach, Defendant/Counter-Plaintiff was required to terminate the contract on or about June 13, 1984; Defendant/Counter-Plaintiff has lost and will continue to lose monies which it could reasonably have expected to earn pursuant to the contract; and sustained other damages.

WHEREFORE, Defendant, Counter-Plaintiff demands judgement against Plaintiff/Counter-Defendant for Two Hundred Thousand Dollars (\$200,000.00) plus costs.

880405 / 9957

COUNT III
(Fraud)

10. Defendant/Counter-Plaintiff incorporates the allegations of Counts I and II in this Count III.

11. When the parties entered into the contract described in Counts I and II herein, Plaintiff/Counter-Defendant, acting with actual malice, falsely represented to Defendant/Counter-Plaintiff, that Plaintiff/Counter-Defendant was the sole owner of the lists and that Defendant/Counter-Plaintiff would be exclusive manager of the lists.

12. At the time these representations were made, Plaintiff/Counter-Defendant knew that the representations were false in that Plaintiff/Counter-Defendant knew that the TRULY CONSERVATIVE CONTRIBUTORS list contained unowned names and that Plaintiff/Counter-Defendant intended to violate the exclusivity agreement by providing the PAID SUBSCRIBERS list to another rental manager.

13. Plaintiff/Counter-Defendant made the aforesaid false representations to defraud Defendant/Counter-Plaintiff.

14. Defendant/Counter-Plaintiff reasonably relied upon the aforesaid fraudulent representations.

15. As a direct and proximate result of Plaintiff/Counter-Defendant's fraudulent representations and Defendant/Counter-Plaintiff's reasonable reliance thereon, Defendant/Counter-Plaintiff sustained damages in that Defendant/Counter-Plaintiff was required to defend a claim made by the Federal Elections Commission; was prevented from taking

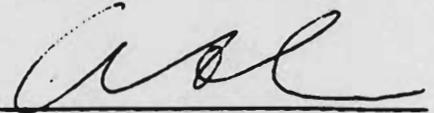
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advantage of other legitimate business opportunities; was required to terminate the aforesaid contracts; lost and will continue to lose monies which it reasonably could have expected to earn pursuant to the contracts; and sustained other damages.

WHEREFORE, Defendant/Counter-Plaintiff demands judgement against Plaintiff/Counter-Defendant for Two Hundred Thousand Dollars (\$200,000.00) in compensatory damages and Two Hundred Fifty Thousand Dollars (\$250,000.00) in punitive damages.

Respectfully submitted,



ANDREW E. BEDERMAN
Attorney for Defendant/
Counter-Plaintiff
8701 Georgia Ave., #600
Silver Spring, MD 20910
495-3131

JURY DEMAND

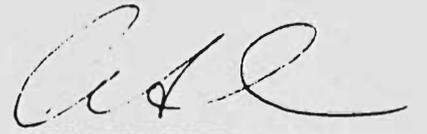
Defendant/Counter-Plaintiff demands a trial by jury as to all issues.



ANDREW E. BEDERMAN

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that on this 24 day of May, 1985, I mailed postage prepaid, a copy of the foregoing Counterclaim to John Perasich, Esquire, and Matthew Watson, Esquire, 1914 Sunderland Pl., NW, Washington, DC 20036.



ANDREW E. BEDERMAN

11

THIS AGREEMENT made this 1 day of September, 1982 by and between Victor Heyman, (hereinafter referred to as the "Owner") and Working Names, Inc., (hereinafter referred to as "Working Names").

W I T N E S S E T H :

WHEREAS Owner represents that it has a mailing list (hereinafter referred to as "the List") up to 100,000 names of conservative and liberal contributors, and

WHEREAS Owner is desirous of making the List available to third parties (hereinafter referred to as "Users"), and

WHEREAS Owner desires to employ Working Names to manage the rental of the List to potential Users.

NOW, THEREFORE, the parties hereto agree as follows:

1. The names of the lists shall be TRULY CONSERVATIVE CONTRIBUTORS, NICE CONSERVATIVE CONTRIBUTORS, COMMITTED LIBERALS, said names shall not be used or referred to by Owner at any time in the future except with prior written consent of Working Names.

2. Working Names agrees to use its best efforts to manage and promote the List and to rent same to Users at a price of \$50.00/M for TRULY CONSERVATIVE CONTRIBUTORS AND NICE CONSERVATIVE CONTRIBUTORS and \$45.00/M for COMMITTED LIBERALS,

3. As compensation for managing the Lists, Working Names shall be entitled to FIFTY percent (50%) of all rental fees received by Working Names as a result of the rental of the Lists to any User.

4. During the term of this Agreement, Working Names shall be solely responsible for and shall hold Owner harmless from any and all fees or comission due from either Working Names or Owner to any broker retained or employed by any User to obtain use of the list.

5. During the term of this Agreement, Owner shall be solely responsible for and shall hold Working Names harmless from any and all fees or costs due to any computer house or service bureau employed by Owner to program, maintain, forward or fulfill any orders concerning the List.

6. Working Names shall not rent the List to any User deemed unacceptable by Owner. Upon receipt of any order for rental of the List, Working Names shall notify Owner in writing of the identity of the proposed User and shall not rent the List to the proposed User until notification has been received from the Owner of the acceptability of the proposed User. Owner shall notify Working Names within thirty (30) days of the date of this Agreement of all known Users of similar lists who would constitute acceptable Users of the List during the term of this Agreement. Owner further agrees to process all orders for the List on a timely basis after being notified of the order by Working Names.

7. During the term of this Agreement, Working Names shall have the exclusive right to manage, rent, sell, or exchange the List. However, Owner shall be entitled to exclusive use of the List for any seven day period provided that written notice is given to Working Names by Owner of its intent to use the List at least sixty (60) days in advance of the first day of the proposed seven day exclusive use period. Working Names shall not be entitled to any portion of any fees received by Owner during any such seven day period so long as Owner does not rent or sell the List during the period to any User introduced to or discovered by Owner through the services of Working Names.

8. Owner affirms that he has free and clear title to the ownership of the List and has not obtained the List or any of the names included therein by any wrongful, improper or illegal means and agrees to be solely responsible for and to hold Working Names and its employees and agents harmless from any and all liability or expense arising out of any approved usage of the List by Working Names including but not limited to all reasonable attorney's fees and costs incurred in defending any action brought by an person or entity which alleges any wrongful, improper or illegal dissemination of the List or any of the names included therein.

9. It is understood and agreed that the above mentioned lists are owned jointly by the owner named herein, as well as Thomas May, Jr., and this contract and that signed by Thomas May, Jr., represents the full management agreement with Working Names, Inc. for the management of said lists.

10. The term of this Agreement shall be one (1) year from the date of its execution. The Agreement shall be automatically renewed under the same terms and conditions unless either party gives written notificatin of termination to the other party at least thirty (30) days in advance of the expiration of the term of this Agreement. In the event that Owner elects to terminate this Agreement at the end of its original term or any renewal

thereof, Owner agrees to pay to Working Names a commission of twenty percent (20%) of any fees recoverable by Owner for any sale or rental of the List within five (5) years of the termination of the final term of this Agreement.

IN WITNESS WHEREOF we sign and acknowledge this Agreement this 1 day of September 1982

WITNESS

Victor K. Heyman
OWNER

WITNESS

Mary A. Cole
WORKING NAMES, INC., by its
Authorized Agent

83040674962

IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, MARYLAND

HEYMAN CONSULTING GROUP, INC. :

Plaintiff :

v. : CAL: 6354

WORKING NAMES, INC. :

Defendant :

ANSWER TO COUNTERCLAIM

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Counterclaim Defendant, HEYMAN CONSULTING GROUP, INC. by and through its attorney, JOHN PERAZICH, answers the Counterclaim of Counterclaim Plaintiff, and states:

1. it admits the allegations of paragraph 1.

2. that paragraph 2 contains conclusions to which the Counterclaim Defendant is not required to answer and that the contract speaks for itself.

3. denies the allegations of paragraph 3.

4. denies the allegations of paragraph 4.

5. restates its answers to paragraphs 1 through 4.

6. denies the allegations of paragraph 5.

7. denies the allegations of paragraph 6.

8. denies the allegations of paragraph 7.

9. denies the allegations of paragraph 8.

10. denies the allegations of paragraph 9.

11. restates its answers to paragraphs 1 through 9.

12. denies the allegations of paragraph 11.

13. denies the allegations of paragraph 12.

14. denies the allegations of paragraph 13.

15. denies the allegations of paragraph 14.

16. denies the allegations of paragraph 15.

17. Counts I through III of the Counterclaim fail to state a cause of action upon which relief can be granted.

WHEREFORE, having fully answered the allegations of the Counterclaim, Counterclaim defendant prays that it be dismissed in its entirety with costs to Counterclaim defendant.

Respectfully submitted,

JOHN PERAZICH
Attorney for Counterclaim Defendant
1914 Sunderland Place, N.W.
Washington, D.C. 20036
331-7530

Of Counsel:

MATTHEW S. WATSON
1914 Sunderland Place, N.W.
Washington, D.C. 20036
293-0224

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CCC# 8839
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IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, MARYLAND

RECEIVED
GENERAL COUNSEL

HEYMAN CONSULTING GROUP, INC.:

Plaintiff,

v.

WORKING NAMES, INC.

Defendant.

: OCT 31 P 4: 23
:
: CAL 6354
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:
:
:

PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS FROM DEFENDANT WORKING NAMES, INC.

The following Request for Production of Documents is addressed to Working Names, Inc. pursuant to Rule 2-422 of the Revised Maryland Rules of Procedure. Said defendant is required to serve a copy of its reponse upon Plaintiff's attorney within thirty (30) days after the Request for Production of Documents is served.

DEFINITIONS

A. "Document" means any writing or recording known to defendant Working Names, Inc., it employees, agents or attorneys, of any type or description, including but not limited to, originals (or if defendant lacks the originals, whatever type of copy it has) of correspondence, letters, agreements, telegrams, memoranda, reports, notes, notebooks, diaries, minutes, photographs, microfilm, tape recordings, account cards and books, computer tapes, cards and printouts

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and all other documentary material, including any non-identical copy (whether different from the original because of any alterations, notes, comments, or other material contained therein or attached thereto or otherwise), whether it is a draft or a final version.

B. "HEYMAN LISTS," include, but are not limited to lists known as "Truly Conservative Contributions", "Nice Conservative Contributors", "Committed Liberals" and "Paid Subscribers" and any other list in which Heyman Consulting Group, Inc. has an interest in whole or in part.

INSTRUCTIONS

A. Where a document is identified by name, production is requested of all identical, similar, or related documents bearing or known by a different name or names.

B. If any document which is requested to be produced was, but no longer is, in your present possession or subject to your control or is no longer in existence, state whether any such document is:

1. missing or lost;
2. destroyed;
3. transferred to others; or
4. otherwise disposed of;

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and, if any such instance, set forth the surrounding circumstances and any authorization for such disposition and state the approximate date of any such disposition and, if known, state also the present location and custodian of such document.

C. If you deem confidential or privileged any documents that are responsive to this request, for each such please supply the following:

1. date;
2. author;
3. recipient;
4. topics discussed;
5. identity of all persons who have a copy of the document; and
6. reasons for withholding production and identification of document (e.g., attorney-client privilege).

D. If you determine that disclosure of any document pursuant to this request would contravene one or more federal laws or state laws protecting the privacy of individuals, you are nevertheless requested to produce the document after deleting or obscuring the identity of the individual and individuals named therein. In such instances, plaintiffs request

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that each individual be assigned a number, letter or other symbol, such that his identity will be later retrievable. In the alternative, the parties may stipulate to a protective order that ensures the privacy of the individuals identified in the documents requested by plaintiffs.

E. You are requested not to destroy or to transfer out of your possession, custody or control any documents requested to be identified by the accompanying Plaintiffs' Request For Production Of Documents during the pendency of this litigation, standard operating procedures for the periodic destruction of documents or records notwithstanding.

REQUESTS

1. Copies of all listing authorizations filed with Standard Rate and Data Service, Inc. and all similar listing organizations with regard to Heyman Lists or any one of them.

2. Copies of all printed or otherwise mechanically duplicated material of whatever sort referring too or referencing Heyman Lists or any one of them.

3. Copies of all rate cards referring to or referencing Heyman Lists or any one of them.

4. Copies of all marketing ddocuments referring to Heyman Lists or any one of them.

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5. Copies of all order forms received by Working Names, Inc. referencing or referring to Heyman Lists or any one of them.

6. Copies of all memoranda of orders taken by Working Names, Inc. referring to or referencing Heyman Lists or any one of them.

7. Copies of all Order Fulfillment Instructions referencing or referring to Heyman Lists or any one of them.

8. Copies of all receipts and memorandum of receipts of Working Names, Inc. for sales of Heyman Lists or any one of them.

9. Copies of all Payments Advices and other memorandum of payment to Heyman Consulting Group, Inc. referencing or referring to Heyman Lists or any one of them.

10. Copies of all Payment Advices and other memorandum of payment to Thomas Mays referencing or referring to Heyman Lists or any one of them.

11. Copies of all Payment Advices and other memorandum of payment to John Whitehead referencing or referring to Heyman Lists or any one of them.

12. All correspondence referencing or referring directly or indirectly to Heyman Lists or any one of them either addressed to or received from Heyman Consulting Group, Inc., Victor Heyman, Thomas Mays or John Whitehead.

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13. All accounting records and ledgers or other documents showing financial transactions or otherwise involving Heyman Lists or any one of them.

14. All financial statements showing accounts payable to Heyman Consulting Group, Inc. Thomas Mays or John Whitehead.

15. Any list of names and addresses of brokers interested in or involved in any transaction involving Heyman Lists or any one of them.

16. Copies of all agreements between Working Names, Inc. and Thomas Mays.

17. Copies of all agreements between Working Names, Inc. and John Whitehead.

18. Copies of all Internal Revenue Service 1099 forms issued by Working Names, Inc. to Heyman Consulting Group, Inc., Thomas Mays or John Whitehead.

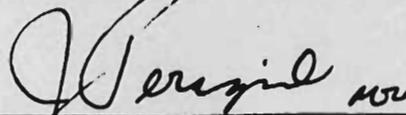
19. Copies or the description of all lists or data bases maintained by Working Names, Inc. including in whole or in part names obtained from the National Aeronautics and Space Administration.

20. Copies or the description of all lists or data bases maintained by Working Names, Inc. including in whole or in part names obtained from the Department of Energy.

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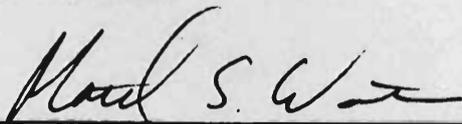
21. Any document upon which Working Names, Inc. intends to rely in this law suit.

Respectfully submitted,



John Perazich, Esq.
PERAZICH AND WYNN
1914 Sunderland Place, N.W.
Washington, D.C. 20036
(202) 331-7530

OF COUNSEL:



Matthew S. Watson, Esq.
1914 Sunderland Place, N.W.
Washington, D.C. 20036
(202) 293-0224

88040674971

IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, MARYLAND

HEYMAN CONSULTING GROUP, INC. :
Plaintiff :
vs. : CAL 6354
WORKING NAMES, INC. :
Defendant :

DEFENDANT'S RESPONSE TO PLAINTIFF'S
REQUEST FOR PRODUCTION OF DOCUMENTS

Defendant, Working Names, Inc., by and through its attorney, ANDREW E. BEDERMAN, responds to Plaintiff's Request for Production of Documents, as follows:

1. REQUEST NO. 1: See documents attached hereto as Exhibit 1.
2. REQUEST NO. 2: See all documents attached hereto in response to this Request for Production of Documents.
3. REQUEST NO. 3: See documents attached hereto as Exhibit 2.
4. REQUEST NO. 4: See documents attached hereto as Exhibit 1.
5. REQUEST NO. 5: See documents attached hereto as Exhibit 3.
6. REQUEST NO. 6: See documents attached hereto as Exhibit 3.
7. REQUEST NO. 7: See documents attached hereto as

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Exhibit 4.

8. REQUEST NO. 8: See documents attached hereto as Exhibits 3 and 4.

9. REQUEST NO. 9: See documents attached hereto as Exhibit 5.

10. REQUEST NO. 10: See documents attached hereto as Exhibit 6.

11. REQUEST NO. 11: See documents attached hereto as Exhibit 7.

12. REQUEST NO. 12: See documents attached hereto as Exhibit 8.

13. REQUEST NO. 13: See documents attached hereto as Exhibit 9.

14. REQUEST NO. 14: See documents attached hereto as Exhibit 10.

15. REQUEST NO. 15: See all documents attached hereto in response to this Request for Production.

16. REQUEST NO. 16: See documents attached hereto as Exhibit 11.

17. REQUEST NO. 17: None.

18. REQUEST NO. 18: None.

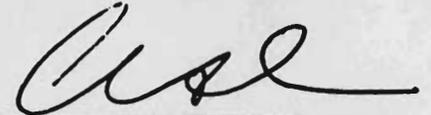
19. REQUEST NO. 19: Upon the advice of counsel, Defendant objects to this request and refuses to produce the documents requested. This request is overbroad and seeks information irrelevant to the issues in this case.

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20. REQUEST NO. 20: See Response to Request No. 19, which is incorporated herein by reference.

21. REQUEST NO. 21: Upon the advice of counsel, Defendant objects to this request for production. The request is overbroad and seeks documents which are protected by the Work Product Privilege. Nevertheless, without waiving its objection, Defendant responds that it intends to rely on the documents attached hereto as Exhibit 12 and all the other documents attached hereto in response to this Request for Production.

Respectfully submitted,



ANDREW E. BEDERMAN
Attorney for Defendant
8701 Georgia Ave., #600
Silver Spring, MD 20910
495-3131

I HEREBY CERTIFY, that on this 11 day of SEPT., 1985,
I mailed postage prepaid, a copy of the foregoing Response to
Matthew S. Watson, Esquire, 1914 Sunderland Pl., NW, Washington,
DC 20036.



ANDREW E. BEDERMAN

83040574974



(301) (301) 686-5163

3/11/83

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C. 20009

A/P - LIST RENTAL ORDER 302-045

Date 2/24/83

Mailer: Moral Majority

Maildate: 3/6/83

5/M TRULY @ \$12.50/M Commission \$ 62.50

Less:

2,500 names @ 1.5¢/each for
initial keypunching costs to
Heyman Consulting Group

(37.50)

TOTAL DUE THIS INVOICE. \$ 25.00

98040574975

RECEIVED APR 28 1983



(301) (301) 696-5163

② 3/11/83

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C. 20009

A/P - LIST RENTAL ORDER 302-027

Date 2/18/83

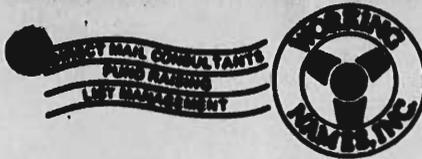
Mailer: Am. Family Assoc. Maildate: 4/11/83

5/M TRULY @ \$12.50/M Commission \$ 62.50

Less 2,500 names @ 1.5¢/each for
initial keypunching costs to
Heyman Consulting Group (37.50)

TOTAL DUE THIS INVOICE. \$ 25.00

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(301) (301) 686-5100

Ⓟ 2/26/83

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C. 20009

A/P - LIST RENTAL ORDER 301-050

Date 1/31/83

Mailer: RNC

Maildate: 2/28/83

5,100 TRULY @ \$12.50/M Commission \$ 63.75

Less 2,500 names @ 1.5¢/each for
initial keypunching costs to
Heyman Consulting Group

(37.50)

TOTAL DUE THIS INVOICE

\$ 26.25

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RECEIVED APR 22 1983

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



(301) (301) 686-5163

Ⓡ 1/31/83

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C. 20009

A/P - LIST RENTAL ORDER 301-034

Date 1/19/83

Mailer: Project Hopes Maildate: 3/21/83

5/M Truly @ \$12.50/M Commission \$ 62.50

Less 2,500 names @ 1.5¢/each for
initial keypunching costs to
Heyman Consulting Group (37.50)

TOTAL COMMISSION DUE. \$ 25.00

RECEIVED APR 11 1983

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(301) (301) 888-8103

Ⓚ 1/31/83

John Whitehead
2006 Columbia Road, Apt. 20
Washington D.C. 20009

A/P- LIST RENTAL ORDER #301-043

Date 1/24/83

Mailer: Covenant House Maildate: 4/4/83

5,100 Truly @ \$12.50/M Commission \$ 63.75

Less 2,500 names @ 1.5¢/each for
initial keypunching costs to
Heyman Consulting Group (37.50)

TOTAL DUE THIS INVOICE. \$ 26.25

88040574979

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(301) (301) 626-5163

① 1/18/83

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C.

A/P - LIST RENTAL ORDER 301-005

Date 1/4/83

Mailer: American Printing House f/t Blind

Maildate: 2/14/83

10,200 TRULY @ \$12.50/M Commission \$ 127.50

Less 5,000 names @ 1.5¢/each for
initial keypunching costs to

Heyman Consulting Group (75.00)

TOTAL COMMISSION DUE. \$ 52.50

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RECEIVED APR 4 1983

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



(301) (301) 688-5103

① 1/18/83

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C.

A/P - LIST RENTAL ORDER 301-014

Date 1/7/83

Mailer: St. Labre

Maildate: 3/14/83

5,140 TRULY @ \$12.50/M Commission \$ 64.25

Less 2,500 names @ 1.5¢/each for
initial keypunching costs to
Heyman Consulting Group

(37.50)

TOTAL COMMISSION DUE. \$ 26.75

RECEIVED APR 11 1983

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(301) (301) 688-5103

② 2/26/83

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C. 20009

A/P - LIST RENTAL ORDER 301-046

Date 1/27/83
Mailer: NRTW-LDF Maildate: 3/21/83

5,100 TRULY @ \$12.50/M Commission \$ 63.75

Less 2,500 names @ 1.50 each for ^{2¢}
initial keypunching costs to
Heyman Consulting Group (37.50)

TOTAL DUE THIS INVOICE. \$ 26.25

CMH/Correct CUGS - 5/31/83 < 12.50 >
\$ 13.75

RECEIVED JUN 23 1983

\$ 367.50
8/15/83 ck # 8268

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Research of this Office revealed that the pseudonym was not the only example of a name from the list coinciding with NCPAC reports. The list portion sent to this Office by Mr. Cohen contained 212 names. After checking those names against a list of 1982 contributors to NCPAC, it appeared that approximately 14 percent of the names on the list portion submitted by Mr. Cohen also appeared on the NCPAC reports filed with the Commission for 1982.

On July 12, 1983, the Commission found reason to believe that Working Names violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. The Commission also approved interrogatories to be sent to Working Names.

In a meeting with counsel for Working Names on August 3, 1983, and in a letter received from Meyer T. Cohen, President of Working Names, on August 12, 1983, this Office was informed of other persons involved in this transaction. In response to a written interrogatory asking him to state the owners of the list, Mr. Cohen stated that the owners are Victor K. Heyman and Heyman Consulting Group, Inc. ("Heyman Consulting") of Rockville, Maryland and Thomas L. Mays of Washington, D.C. Mr. Cohen's response indicated that the functions of the participants dealing with the list were divided as follows: Working Names advertised and marketed the list and received payment from the list users. Victor Heyman and Heyman Consulting performed computer processing of the list material, entering the names which they received onto computer tapes and duplicating the tapes or producing mailing labels from the tape information. Mr. Mays obtained the names themselves. According to oral representations by counsel and

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Meyer Cohen's written response, Mr. Mays traveled to the various offices of the Secretaries of State and obtained the filings made for state and local elections and did not "knowingly" use any material required by federal law to be filed with a Secretary of State.

On October 3, 1983, this Office, with the Commission's approval, sent a letter to the complainant asking whether NCPAC had included the solicited pseudonym on any list or report other than the report of contributors submitted to the Commission. On October 18, NCPAC replied that the pseudonym "was not used by NCPAC on any report or list of names filed with any agency other than the Federal Election Commission."

On February 7, 1984, the Commission found reason to believe that Meyer Cohen and Thomas L. Mays violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. The response of counsel for the respondents included an affidavit from Mr. Mays listing the offices of the Secretaries of State in eight states as the sources of the list, "Truly Conservative Contributors."

On May 10, 1984, this Office sent questions to these eight offices inquiring as to the process by which members of the public may review or receive copies of political campaign finance reports and as to whether and how state reports are separated from federal reports. Procedures differ from state to state. All but one of the states separate state filings from federal filings. This is done by having a separate state office for the receipt of filings for state candidacies, by separate filing rooms, or by separate, clearly marked cabinets. The Florida Secretary of State's Office stated that it does not separate

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federal and state files in the above manner. It also stated that NCPAC files reports in computerized form and does not separate federal and state activity.

In response to a request from counsel, the Commission, on October 30, 1984, voted to approve entering into pre-probable cause conciliation with Mr. Mays, Mr. Cohen and Working Names, and Mr. Heyman and Heyman Consulting. After a meeting between respondents' counsel and OGC staff members, respondents' counsel sent in signed proposals which this Office received on November 30, 1984.

On January 8, 1985, the Commission voted to amend the proposals signed by the respondents and to send them back to the respondents for their consideration. On March 1, 1985, the Commission voted to accept the amended proposal that was signed by Victor K. Heyman and the Heyman Consulting Group and to close the file as to these two respondents.

On May 8, 1985, this Office sent briefs to the new counsel for Mr. Mays and Working Names and Mr. Cohen, stating that the General Counsel was prepared to recommend that the Commission find probable cause to believe that the remaining respondents violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. No reply briefs were received from counsel.

On July 23, 1985, the Commission found probable cause to believe that Thomas Mays, Working Names, Inc. and Meyer T. Cohen violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15 and voted to commence conciliation negotiations.

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This Office and counsel for the respondents were unable to reach an agreement. In early October, just prior to being informed by respondents' counsel that the respondents would not sign a modified proposal offered by this Office, the former counsel for the respondents called this Office. He is representing Heyman Consulting Group in a state court suit against Working Names for payments allegedly owed by Working Names. During the discovery process in this litigation, Working Names sent certain documents to Heyman Consulting Group. These documents included "Payment Advices," i.e., memoranda of payments, on Working Names stationery listing John Whitehead, a businessman actively involved in the mailing list industry, as the payee. (See Attachment 1). The Payment Advices were for the Truly Conservative Contributors list. Each document included the billing date, the "maildate," the "mailer," i.e., the organization purchasing the use of the names, the amount of names from the list being used, the amount of the commission per thousand names, and a deduction for the amount of money being paid to the Heyman Consulting Group. One of these Payment Advices referred to 5,100 names from Truly Conservative Contributors going to the RNC with a maildate of February 28, 1983. Another Payment Advice referred to 10,200 names from Truly Conservative Contributors going to the American Printing House for the Blind with a maildate of February 14, 1983. The dates indicate that these mailings may be the mailings referred to in the complaints initiating this matter.

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Mr. Whitehead has responded to a set of Commission interrogatories in a previous matter involving 2 U.S.C. § 438(a)(4), MUR 1549. It appears that he conducts his business through John Whitehead and Associates.

II. LEGAL ANALYSIS

Section 438(a)(4) of Title 2 and section 104.15 of the Commission's Regulations provide that any information copied from filed reports may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of a political committee to solicit contributions from such committee. Section 104.15(a) includes reports filed with Secretaries of State within the prohibition.

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The appearance of the pseudonym in the list offered by the respondents is strong evidence that the list was compiled from prohibited sources. Furthermore, the responses of the state offices maintaining the reports from which the names were obtained reveal that sufficient care was not exercised in compiling the list. Two of the offices used, the Alaska Lieutenant Governor's Office and the Louisiana Secretary of State's Office, maintain reports only of federal candidates and committees. The defense has been posed that only non-federal sources were used. It is apparent from the information as to the state offices used that there was insufficient regard for the provisions of the Act and Regulations in the compilation of this list.

The evidence presented indicates that there may have been another owner of the list besides Victor Heyman and the Heyman

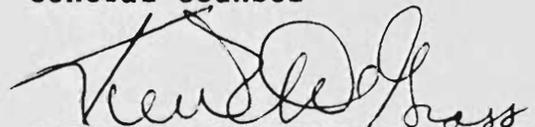
Consulting Group and Thomas Mays. This Office, therefore, wishes to withhold the recommendation of Commission authorization to file a civil suit in this matter until the issue of the involvement of Mr. Whitehead and his company is resolved. As a possible co-owner of the list or as a major participant in a transaction involving the use of reported names of contributors to federal candidates, Mr. Whitehead and his company may have violated the Act.

Based on the foregoing analysis, this Office recommends that the Commission find reason to believe that John L. Whitehead and John Whitehead and Associates violated 2 U.S.C. 438(a)(4) and 11 C.F.R § 104.15. In order to clarify the remaining areas of inquiry in this matter, this Office recommends that the Commission approve a subpoena for documents and testimony from Mr. Whitehead.

III. RECOMMENDATIONS

1. Find reason to believe that John L. Whitehead and John Whitehead and Associates violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.
2. Approve the attached subpoena for documents and deposition.
3. Approve the attached letter and factual and legal analysis.

Charles N. Steele
General Counsel



By: Kenneth A. Gross
Associate General Counsel

November 26, 1985
Date

Attachments

1. Documents received from former counsel for Meyer Cohen, Working Names, and Thomas Mays
2. Letter, subpoena, and factual and legal analysis for John Whitehead.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Thomas L. Mays) MUR 1542
Working Names, Inc.)
Meyer T. Cohen)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on December 4, 1985, the Commission decided by a vote of 5-0 to take the following actions in MUR 1542:

1. Find reason to believe that John L. Whitehead and John Whitehead and Associates violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.
2. Approve the subpoena for documents and deposition attached to the General Counsel's Report signed November 26, 1985.
3. Approve the letter and factual and legal analysis attached to the General Counsel's Report signed November 26, 1985.

Commissioners Aikens, Elliott, Harris, Josefiak and McGarry voted affirmatively for this decision; Commissioner McDonald did not cast a vote.

Attest:

12-4-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary: Fri., 11-29-85, 12:20
Circulated on 48 hour tally basis: Mon., 12-2-85, 11:00
Deadline for vote: Wed., 12-4-85, 11:00

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1985

John L. Whitehead
John Whitehead and Associates
2006 Columbia Road, N.W. #20
Washington, D.C. 20009

RE: MUR 1542
John L. Whitehead
John Whitehead and Associates

Dear Mr. Whitehead:

On December 4, 1985, the Federal Election Commission determined that there is reason to believe that you and your company violated 2 U.S.C. § 438(a)(4), a provision of the Federal Election Act of 1971, as amended ("the Act"), and 11 C.F.R. § 104.15, a provision of the Commission Regulations. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and your company. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit such materials along with your production of documents in response to the enclosed subpoena. It is required that you submit the information under oath and that you do so within ten days of your receipt of this letter.

You may consult with an attorney and have an attorney assist you in the preparation of your responses and in the production of documents. You may also have an attorney present with you at the deposition. If you intend to be represented by counsel, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel and authorizing such counsel to receive any notifications or other communications from the Commission.

In the absence of any additional information which demonstrates that no further action should be taken against you and your company, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire.

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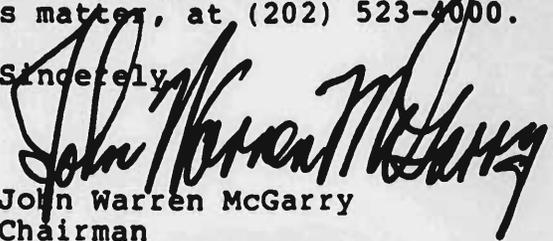
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John L. Whitehead & John Whitehead and Associates
Page 2

The investigation now being conducted will be 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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jonathan Levin, the attorney assigned to this matter, at (202) 523-4000.

Sincerely,


John Warren McGarry
Chairman

Enclosures
General Counsel's Factual and Legal Analysis
Subpoena
Procedures
Designation of Counsel Form

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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)
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MUR 1542

SUBPOENA

To: John L. Whitehead
John Whitehead and Associates
2006 Columbia Road, N.W. #20
Washington, D.C. 20009

Pursuant to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-styled matter, the Federal Election Commission hereby subpoenas you to appear for deposition with regard to a possible violation of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. Notice is hereby given that the deposition is to be taken on January 22, 1986 at the Office of the General Counsel, Federal Election Commission, 1325 K Street, N.W., beginning at 10 a.m. and continuing each day thereafter as necessary.

Further pursuant to section 437d of Title 2, United States Code, you are hereby subpoenaed to produce on January 2, 1986, at the above stated location:

any and all documents pertaining to any transactions from October 1982 through April 1983, involving the names that became the list called "Truly Conservative Contributors" between you (i.e., John L. Whitehead and/or John Whitehead and Associates and

- (a) Thomas L. Mays,
- (b) Working Names, Inc. and/or Meyer Cohen,
- (c) Heyman Consulting Group, Inc. and/or Victor K. Heyman.

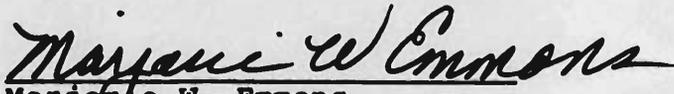
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WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand at Washington, D.C., this 18th,
day of *December*, 1985.


John Warren McGarry
Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission

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GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 1542

RESPONDENTS: John L. Whitehead
John Whitehead and Associates

SUMMARY OF ALLEGATIONS

This matter involves an allegation that John L. Whitehead and John Whitehead and Associates violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15 by using for commercial purposes names of contributors filed with the Commission.

FACTUAL BASIS AND LEGAL ANALYSIS

Two complaints were filed by the National Conservative Political Action Committee alleging violations of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. These complaints alleged that the American Printing House for the Blind and the Republican National Committee solicited contributions from a pseudonym submitted by NCPAC to the Reports Analysis Division pursuant to 2 U.S.C. § 438(a)(4). NCPAC stated further in these allegations that Working Names, Inc. and Meyer T. Cohen, an officer of Working Names, had rented the list containing the pseudonym to the solicitors.

In response to the complaint, Meyer Cohen of Working Names admitted that his company has the pseudonym, and he sent us the portion of the list containing the pseudonym. He stated that Working Names is a list management company representing two owners of the list and that the two owners compiled the list in "a legally acceptable manner." Mr. Cohen proceeded to state that

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the pseudonym or "decoy" submitted by NCPAC may not be a "true decoy" in that it may be obtainable from some source other than reports filed with the Commission or with Secretaries of State.

Research of this Office revealed that the pseudonym was not the only example of a name from the list coinciding with NCPAC reports. The list portion sent to this Office by Mr. Cohen contained 212 names. After checking those names against a list of 1982 contributors to NCPAC, it appeared that approximately 14 percent of the names on the list portion submitted by Mr. Cohen also appeared on the NCPAC reports filed with the Commission for 1982.

In a meeting with counsel for Working Names on August 3, 1983, and in a letter received from Meyer T. Cohen, President of Working Names, on August 12, 1983, this Office was informed of other persons involved in this transaction. In response to a written interrogatory asking him to state the owners of the list, Mr. Cohen stated that the owners are Victor K. Heyman and Heyman Consulting Group, Inc. ("Heyman Consulting") of Rockville, Maryland and Thomas L. Mays of Washington, D.C. Mr. Cohen filed written statements that the functions of the participants dealing with the list were divided as follows: Working Names advertised and marketed the list and received payment from the list users. Victor Heyman and Heyman Consulting performed computer processing of the list materials, entering the names which they received onto computer tapes and duplicating the tapes or producing mailing labels from the tape information. Mr. Mays obtained the names themselves. According to oral representations by counsel

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and Meyer Cohen's written response, Mr. Mays traveled to the various offices of the Secretaries of State and obtained the filings made for state and local elections and did not "knowingly" use any material required.

On October 3, 1983, this Office, with the Commission's approval, sent a letter to the complainant asking it if it had included the solicited pseudonym on any list or report other than the report of contributors submitted to the Commission. On October 18, NCPAC replied that the pseudonym "was not used by NCPAC on any report or list of names filed with any agency other than the Federal Election Commission."

Mr. Mays sent an affidavit to this Office listing the offices of the Secretaries of State in eight states as the sources of the list, "Truly Conservative Contributors."

On May 10, 1984, this Office sent questions to these eight offices inquiring as to the process by which members of the public may review or receive copies of political campaign finance reports and as to whether and how state reports are separated from federal reports. Procedures differ from state to state. All but one of the states separate state filings from federal filings. This is done by having a separate state office for the receipt of filings for state candidacies, by separate filing rooms, or by separate, clearly marked cabinets. The Florida Secretary of State's office stated that it does not separate federal and state files in the above manner. It also stated that NCPAC files reports in computerized form and does not separate federal and state activity.

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In early October 1985, the former counsel for the respondents called this Office. He is representing Heyman Consulting Group in a state court suit against Working Names for payments allegedly owed by Working Names. During the discovery process in this litigation, Working Names sent certain documents to Heyman Consulting Group. These documents included "Payment Advices," i.e., memoranda of payments, on Working Names stationery listing John Whitehead, a businessman actively involved in the mailing list industry, as the payee. The Payment Advices were for the list "Truly Conservative Contributors." Each document includes the billing date, the "maildate," the "mailer," i.e., the organization purchasing the use of the names, the amount of names from the list being used, the amount of the commission per thousand names, and a deduction for the amount of money being paid to the Heyman Consulting Group. One of these Payment Advices referred to 5,100 names from Truly Conservative Contributors going to the RNC with a maildate of February 28, 1983. Another Payment Advice referred to 10,200 names from Truly Conservative Contributors going to the American Printing House for the Blind with a maildate of February 14, 1983. The dates indicate that these mailings may be the mailings referred to in the complaints initiating this matter.

Mr. Whitehead has responded to a set of Commission interrogatories in a previous matters involving 2 U.S.C. § 438(a)(4), MUR 1549. It appears that he conducts his business through John Whitehead and Associates.

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Section 438(a)(4) of Title 2 and section 104.15 of the Commission's Regulations provided that any information copied from filed reports may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of a political committee to solicit contributions from such committee. Section 104.15(a) includes reports filed with Secretaries of State within the prohibition.

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The appearance of the pseudonym in the list offered by the respondents is strong evidence that the list was compiled from prohibited sources. Furthermore, the responses of the state offices maintaining the reports from which the names were obtained reveal that sufficient care was not exercised in compiling the list. Two of the offices used, the Alaska Lieutenant Governor's Office and the Louisiana Secretary of State's Office, maintain reports only of federal candidates and committees. The defense has been posed that only non-federal sources were used. It is apparent from the information as to the state offices used that there was insufficient regard for the provisions of the Act and Regulations in the compilation of this list.

The evidence presented indicates that there may have been another owner of the list besides Victor Heyman and the Heyman

Consulting Group and Thomas Mays. As a possible co-owner of the list or as a major participant in a transaction involving the use of reported names of contributors to federal candidates, Mr. Whitehead and his company may have violated the Act.

Based on the foregoing analysis, this Office recommends that the Commission find reason to believe that John L. Whitehead and John Whitehead and Associates violated 2 U.S.C. 438(a)(4) and 11 C.F.R. § 104.15.

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LAW OFFICES
SILVER, FREEDMAN & TAFF
(A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS)

1735 EYE STREET, N. W.
ELEVENTH FLOOR
WASHINGTON, D. C. 20006
(202) 429-6100
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BARRY P. TAFF
JEAN ROSEN
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DAVID B. MYATT
JAMES S. FLEISCHER
JEFFREY M. WERTHAN
LOIS G. JACOBS
KIP A. WEISSMAN •
EARL L. METHENY •
CHERYL R. FRANK •
STEPHEN J. O'CONNOR
DAVID M. KOSS
ILSA K. BUSH
DIANA M. SAVIT
LAWRENCE H. KIRSCH •
JOHN J. SPIDI •
MARTIN L. MEYROWITZ
CATHERINE H. EIKLAND •

*Put into
computer at
GCM 9357*

COUNSEL
ROBERT N. LEVIN
SUSAN BIRO
GCC# 9357
WRITER'S DIRECT DIAL NUMBER
(202) 429-

January 9, 1986

• NOT ADMITTED IN D.C.

HAND DELIVERED

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RECEIVED
GENERAL COUNSEL

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

Re: John L. Whitehead
MUR 1542

Dear Mr. Levin:

Please be advised that I have been retained to represent Mr. Whitehead in regard to the captioned matter. Confirming our earlier telephone conversations, please find enclosed Mr. Whitehead's response to the subpoena issued December 18, 1985 in this matter. I am sorry that we are several days late, but we are new in the case and it took a while to figure things out.

As I informed you on the phone on January 9, 1986, the materials supplied are as follows:

1. There are two ledger sheets maintained by Thomas Mays showing receipts arising from rentals of the Truly Conservative list. The dates go beyond the days called for by the subpoena, but appear to be generally responsive as "pertaining" to the transactions wherein the raw names were supplied.

2. A stack of 30 checks from Mr. Whitehead to Mr. Mays. I believe there are several instances where checks were paid to third parties on Mr. Mays' behalf by Mr. Whitehead. Essentially the checks represent the division of proceeds from the rentals on a 50/50 basis. As I understand it a number of the checks from Working Names Inc. were written to Mr. Whitehead who in turn would write a check to Mr. Mays for 50% thereof.

3. A stack consisting of 66 forms entitled "Fulfillment Instruction Order." As I understand it when Working Names would receive an order they would issue one of these documents to the list owners.

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Jonathan Levin, Esq.
January 9, 1986
Page Two

4. A stack consisting of 18 forms generally entitled "A/P Payment Advice." In most instances the payment advices do not make life simple by identifying "Truly Conservatives". I suppose it might be possible by going through the serial numbers to tie these forms back into the Fulfillment Instruction Orders. (See Item 3 above) I suspect that the majority of the forms produced under this heading go beyond the subpoena, but I have not done the matching to determine that.

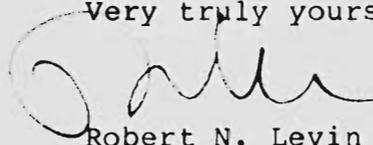
5. Letter dated June 21, 1984 from Working Names, Inc. to Messrs. Heyman and Mays.

6. A stack of documents which were provided to me by counsel in the Circuit Court action. I suspect that there is a substantial overlap between these documents and the documents referred to above. Again I have not sat down and tried to line them up to eliminate duplications.

Per our discussion on the 9th I would very much appreciate it if the Commission could make it possible to have the originals back as promptly as possible.

I very much appreciate your willingness to discuss this matter and reciprocally if there are any questions you might have prior to the deposition, I would be pleased to attempt to get them answered.

Very truly yours,



Robert N. Levin

RNL:mf
Enclosures

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NAME John L. Whitehead 5-15-84 N 15-7
540

PAY TO THE ORDER OF Thomas L. Mays Jr. \$ 300.00
three hundred dollars & 00/100 DOLLARS

 THE NATIONAL BANK OF WASHINGTON
 WASHINGTON, D.C. 20008

John L. Whitehead

280

JOHN L. WHITEHEAD
 2008 COLUMBIA RD., N.W., NO. 20
 WASHINGTON, D.C. 20008

April 30 19 83 15-7
3406

PAY TO THE ORDER OF Thomas L. Mays Jr. \$ 550.00
five hundred fifty dollars & 00/100 DOLLARS

 THE NATIONAL BANK OF WASHINGTON
 WASHINGTON, D.C. 20008

John L. Whitehead

1459

 JOHN L. WHITEHEAD
 2008 COLUMBIA ROAD, NW., NO. 20
 WASHINGTON, D.C. 20008

9-13-84 15-3
5408

PAY TO THE ORDER OF Thomas Mays Jr. \$ 515.00
five hundred fifteen dollars & 00/100 DOLLARS

The RIGGS NATIONAL BANK
 of WASHINGTON, D.C.
 UNIVERSAL OFFICE
 CONNECTICUT AVENUE AND T STREET, N.W.

John Whitehead

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JOHN L. WHITEHEAD
 2008 COLUMBIA ROAD, NW., NO. 20
 WASHINGTON, D.C. 20008

3-17-83 995

Pay to the order of Thomas L. Mays \$ 2000.00
Two thousand dollars & 00/100

The RIGGS NATIONAL BANK
 of WASHINGTON, D.C.
 UNIVERSAL OFFICE
 CONNECTICUT AVENUE AND T STREET, N. W.

John L. Whitehead

JOHN L. WHITEHEAD
 2008 COLUMBIA ROAD, NW., NO. 20
 WASHINGTON, D.C. 20008

5-11-83 998

Pay to the order of Thomas L. Mays Jr. \$ 50.35/100
Fifty dollars & 35/100

The RIGGS NATIONAL BANK
 of WASHINGTON, D.C.
 UNIVERSAL OFFICE
 CONNECTICUT AVENUE AND T STREET, N. W.

John L. Whitehead

JOHN L. WHITEHEAD
 2008 COLUMBIA ROAD, NW., NO. 20
 WASHINGTON, D.C. 20008

6-7-84 1376

Pay to the order of Thomas L. Mays Jr. \$ 700.00
Seven hundred dollars & 00/100

The RIGGS NATIONAL BANK
 of WASHINGTON, D.C.
 UNIVERSAL OFFICE
 CONNECTICUT AVENUE AND T STREET, N. W.

John L. Whitehead

JOHN L. WHITEHEAD
2008 COLUMBIA RD., N.W., NO. 20
WASHINGTON, D.C. 20008

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540

PAY TO THE
ORDER OF

Thomas L. Mays Jr.

\$ 378.76/100

three hundred seventy eight and 76/100

DOLLARS

THE NATIONAL BANK
OF WASHINGTON

UNIVERSAL OFFICE WASHINGTON, D.C. 20008

John L. Whitehead

JOHN L. WHITEHEAD
2008 COLUMBIA ROAD, NW., NO. 20
WASHINGTON, D.C. 20008

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15-3
540

Thomas L. Mays Jr.

\$ 500.00

five hundred dollars + 00/100

The RIGGS NATIONAL BANK

of WASHINGTON, D.C.
UNIVERSAL OFFICE
CONNECTICUT AVENUE AND T STREET, N. W.

John L. Whitehead

JOHN L. WHITEHEAD
2008 COLUMBIA ROAD, NW., NO. 20
WASHINGTON, D.C. 20008

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540

Thomas L. Mays Jr.

\$ 500.00

five hundred dollars + 00/100

The RIGGS NATIONAL BANK

of WASHINGTON, D.C.
UNIVERSAL OFFICE
CONNECTICUT AVENUE AND T STREET, N. W.

John L. Whitehead

88040575005

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JOHN L. WHITEHEAD
2008 COLUMBIA ROAD, NW., NO. 20
WASHINGTON, D.C. 20009

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1/30/85

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5408

PAY TO THE ORDER OF Thomas L. Mays \$ 700.00

Seven Hundred Dollars & 00/100

The RIGGS NATIONAL BANK
of WASHINGTON, D.C.
UNIVERSAL OFFICE
CONNECTICUT AVENUE AND T STREET, N. W.

John L. Whitehead

JOHN L. WHITEHEAD
2008 COLUMBIA ROAD, NW., NO. 20
WASHINGTON, D.C. 20009

1346

12-4-85

15-3
5408

PAY TO THE ORDER OF Thomas L. Mays Jr. \$ 1000.00

One Thousand Dollars & 00/100

The RIGGS NATIONAL BANK
of WASHINGTON, D.C.
UNIVERSAL OFFICE
CONNECTICUT AVENUE AND T STREET, N. W.

John L. Whitehead

JOHN L. WHITEHEAD
2022 COLUMBIA RD., N.W., NO. 105
WASHINGTON, D.C. 20009

189

3-7 1985

15-7
5407

PAY TO THE ORDER OF Thomas L. Mays Jr. \$ 500.00

Five Hundred & 00/100 DOLLARS

THE NATIONAL BANK OF WASHINGTON
UNIVERSAL OFFICE, WASHINGTON, D.C. 20007

John L. Whitehead

JOHN L. WHITEHEAD
2008 COLUMBIA RD., N.W., NO. 20
WASHINGTON, D.C. 20008

539

5-14 19 84 ¹⁵⁻⁷/₅₄₀

PAY TO THE ORDER OF

Thomas L. Mays Jr. \$ 800.00
Eight hundred dollars 00/100 DOLLARS

 THE NATIONAL BANK
OF WASHINGTON

UNIVERSAL OFFICE WASHINGTON, D.C. 20007

John L. Whitehead

MEMO

98040675007

JOHN L. WHITEHEAD
2008 COLUMBIA ROAD, N.W., NO. 20
WASHINGTON, D.C. 20008

1413

10/21 84 ¹⁵⁻³/₅₄₀

Thomas L. Mays Jr. \$ 1000.00
One thousand dollars 00/100 DOLLARS

The RIGGS NATIONAL BANK

of WASHINGTON, D.C.
UNIVERSAL OFFICE

CONNECTICUT AVENUE AND T STREET, N.W.

John L. Whitehead

JOHN L. WHITEHEAD
2008 COLUMBIA ROAD, N.W., NO. 20
WASHINGTON, D.C. 20008

1283

5-24 83 ¹⁵⁻³/₅₄₀

Thomas L. Mays Jr. \$ 440.00
four hundred forty dollars 00/100 DOLLARS

The RIGGS NATIONAL BANK

CONNECTICUT AVENUE AND T STREET, N.W.

John L. Whitehead

83040675008

JOHN L. WHITEHEAD
2008 COLUMBIA ROAD, NW., NO. 20
WASHINGTON, D.C. 20008

1364
6-29-84 15-3
5408

To: Tom Mays \$ 800.00
Eight Hundred Dollars

The RIGGS NATIONAL BANK
of WASHINGTON, D.C.
UNIVERSAL OFFICE
CONNECTICUT AVENUE AND T STREET, N. W.

John L. Whitehead

JOHN L. WHITEHEAD
2008 COLUMBIA ROAD, NW., NO. 20
WASHINGTON, D.C. 20008

1371
7-20-84 15-3
5408

To: Thomas L. Mays \$ 400.00
Four Hundred Dollars

The RIGGS NATIONAL BANK
of WASHINGTON, D.C.
UNIVERSAL OFFICE
CONNECTICUT AVENUE AND T STREET, N. W.

John L. Whitehead

JOHN L. WHITEHEAD
2008 COLUMBIA ROAD, NW., NO. 20
WASHINGTON, D.C. 20008

1677
Dec. 2 - 84 15-3
5408

To: Thomas L. Mays Jr. \$ 530.00
Five hundred thirty dollars

The RIGGS NATIONAL BANK
of WASHINGTON, D.C.
UNIVERSAL OFFICE
CONNECTICUT AVENUE AND T STREET, N. W.

John L. Whitehead

88040675009

JOHN L. WHITEHEAD
2008 COLUMBIA RD., N.W., NO. 20
WASHINGTON, D.C. 20008

619
9-14 1984 15-3
340

PAY TO THE ORDER OF Thomas L. Mays, Jr. \$ 500.00
five hundred dollars + 00/100 DOLLARS

 THE NATIONAL BANK OF WASHINGTON
UNIVERSAL OFFICE WASHINGTON, D.C. 20008

MEMO _____

John L. Whitehead

JOHN L. WHITEHEAD
2008 COLUMBIA ROAD, NW., NO. 20
WASHINGTON, D.C. 20008

1336
12-14-84 15-3
5408

PAY TO THE ORDER OF Thomas L. Mays, Jr. \$ 250.00
two hundred fifty dollars + 00/100 DOLLARS

The RIGGS NATIONAL BANK
of WASHINGTON, D.C.
UNIVERSAL OFFICE
CONNECTICUT AVENUE AND T STREET, N.W.

John L. Whitehead

JOHN L. WHITEHEAD
2008 COLUMBIA ROAD, NW., NO. 20
WASHINGTON, D.C. 20008

1482
12/31/84 15-3
5408

PAY TO THE ORDER OF Thomas L. Mays, Jr. \$ 70.00
seventy dollars + 00/100 DOLLARS

The RIGGS NATIONAL BANK
of WASHINGTON, D.C.
UNIVERSAL OFFICE
CONNECTICUT AVENUE AND T STREET, N.W.

John L. Whitehead

88040675010

1479

JOHN L. WHITEHEAD
2008 COLUMBIA ROAD, NW., NO. 20
WASHINGTON, D.C. 20008

12-K-84

15-3
5408

Thomas L. Mays Jr. \$ 500.00
Five hundred dollars & 00/100

The RIGGS NATIONAL BANK
of WASHINGTON, D.C.
UNIVERSAL OFFICE
CONNECTICUT AVENUE AND T STREET, N. W.

John L. Whitehead

1244

JOHN L. WHITEHEAD
2008 COLUMBIA ROAD, NW., NO. 20
WASHINGTON, D.C. 20008

2-4-83

15-1
540

Thomas L. Mays Jr. \$ 430.00
four hundred thirty dollars & 00/100

The RIGGS NATIONAL BANK
of WASHINGTON, D.C.
UNIVERSAL OFFICE
CONNECTICUT AVENUE AND T STREET, N. W.

John L. Whitehead

297242

266

JOHN L. WHITEHEAD
2008 COLUMBIA RD., N.W., NO. 20
WASHINGTON, D.C. 20008

12-1-83

15-7
540

PAY TO THE ORDER OF Thomas L. Mays Jr. \$ 100.00
one hundred dollars & 00/100 DOLLARS

THE NATIONAL BANK
OF WASHINGTON
WASHINGTON, D. C. 20008

John L. Whitehead

83040675011

JOHN L. WHITEHEAD
 2008 COLUMBIA ROAD, N.W., NO. 20
 WASHINGTON, D.C. 20008

1359

6-22-84 15-3
5408

PAY TO THE ORDER OF Thomas L. Mays Jr. \$ 1000.00
One Thousand Dollars & 00/100

The RIGGS NATIONAL BANK
 of WASHINGTON, D.C.
 UNIVERSAL OFFICE
 CONNECTICUT AVENUE AND T STREET, N. W.

John L. Whitehead

JOHN L. WHITEHEAD
 2008 COLUMBIA RD., N.W., NO. 20
 WASHINGTON, D.C. 20008

273

2-11-1984 1576
5406

PAY TO THE ORDER OF Ray Burnette Vol Rourquin \$ 5077.00
five thousand seventy seven & 00/100 DOLLARS

THE NATIONAL BANK
 OF WASHINGTON
 WASHINGTON, D. C. 20008

John L. Whitehead

JOHN L. WHITEHEAD
 2008 COLUMBIA RD., N.W., NO. 20
 WASHINGTON, D.C. 20008

165

7-18-1983 1576
5406

PAY TO THE ORDER OF Thomas L. Mays Jr. \$ 643.00
Six hundred forty three & 00/100 DOLLARS

THE NATIONAL BANK
 OF WASHINGTON
 WASHINGTON, D. C. 20008

John L. Whitehead

33040675012

1-22-1983 No.

JOHN L. WHITEHEAD

Pay to the order of Thomas L. Mays Jr. \$ 100.00
One hundred Dollars & 00/100 Dollars

 THE NATIONAL BANK OF WASHINGTON
Washington, D.C.

Memo: _____ John L. Whitehead

1-24-1983 No.

JOHN L. WHITEHEAD

Pay to the order of Thomas Mays \$ 2000.00
two thousand Dollars & 00/100 Dollars

 THE NATIONAL BANK OF WASHINGTON
Washington, D.C.

Memo: _____ John L. Whitehead

108
1576
5406

JOHN L. WHITEHEAD
2008 COLUMBIA RD., N.W., NO. 20
WASHINGTON, D.C. 20009

5-6-1983

PAY TO THE ORDER OF Thomas L. Mays Jr. \$ 317.00
three hundred seventeen Dollars & 00/100 DOLLARS

 THE NATIONAL BANK OF WASHINGTON
WASHINGTON, D.C. 20008

Memo: car- John L. Whitehead

88040675013

EXHIBIT 7



WORKING NAMES, INC.
 4421A East-West Highway
 Bethesda, Maryland 20014
 (301) 658-5103

④ 11/15/82

John Whitehead
 2006 Columbia Road, Apt. 20
 Washington, D.C. 2

A/P - LIST RENTAL ORDER 209-054

Date 9/28/82
 Mailer: USO

5/M names @ \$11.25/M commission \$56.25

Less 2,500 names @ 1.5¢/each for
 initial keypunching costs to
 Heyman Consulting Group (37.50)

TOTAL COMMISSION DUE. \$18.75

88040675014

CK# 2983
 3/30/83
 \$123.49

RECEIVED MAR 14 1983



WORKING NAMES, INC.
4421A East-West Highway
Bethesda, Maryland 20014
(301) 656-5103

③ 11/15/82

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C.

A/P-LIST RENTAL ORDER 210-024

Date 10/22/82
Mailer: NRTW-LDF

5/M names @ \$11.25/M commission \$56.25

Less 2,500/names @ 1.5¢/each for
initial keypunching costs to
Heyman Consulting Group. (37.50)

TOTAL COMMISSION DUE \$18.75

88040675015

RECEIVED FEB 7 1983



WORKING NAMES, INC.

4421A East-West Highway
Bethesda, Maryland 20014

(301) 656-5103

② 12/23/82

John Whitehead
2006 Columbia Road, Apt, 20
Washington, D.C.

LIST RENTAL ORDER #211-027/ACCOUNTS PAYABLE

Date 11/15/82

Mailer: Covenant House Maildate: 1/17/83

5,310 names @ \$11.25/M commission \$ 59.74

Less 2,500 names @ 1.5¢/each for
initial keypunching costs to
Heyman Consulting Group (37.50)

TOTAL COMMISSION DUE. \$ 22.24

88040575016

2983
3/30/83
\$ 23.49
=

RECEIVED FEB 23 1983



(301) (301) 688-5163

Ⓟ 2/26/83

John Whitehead
2006 Columbia Raod, Apt 20
Washington, D.C. 20009

A/P - LIST RENTAL ORDER 302-005

Date 2/4/83

Mailer: AD PAC

Maildate: 2/11/83

5/M COMMITTED @ \$11.25/M Commission \$ 56.25

Telemetering @ \$ 3.75/M " 18.75

Less 2,500 names @ 1.5¢/each for
initial keypunching costs to
Heyman Consulting Group (37.50)

TOTAL DUE THIS INVOICE. \$ 37.50

repayment rec'd 2/24/83

98040675017



(301) (301) 888-8183

② 1/31/83

John Whitehead
2006 Columbia Road, Apt. 20
Washington D.C. 20009

A/P- LIST RENTAL ORDER #301-043

Date 1/24/83

Mailer: Covenant House Maildate: 4/4/83

5,100 Truly @ \$12.50/M Commission \$ 63.75

Less 2,500 names @ 1.5¢/each for
initial keypunching costs to
Heyman Consulting Group (37.50)

TOTAL DUE THIS INVOICE. \$ 26.25

88040675018

RECEIVED MAR 15 1983



WORKING NAMES, INC.
4421A East-West Highway
Bethesda, Maryland 20014
(301) 656-5103

Ⓟ 12/23/82

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C.

LIST RENTAL ORDER #212-005/ACCOUNTS PAYABLE

Date 12/1/82
Mailer: MADD Maildate: 1/17/83

10,680 names @ \$11.25/M Commission	\$ 120.15
Less 5,000 names @ 1.5¢/each for initial keypunching costs to Heyman Consulting Group	(<u>75.00</u>)
TOTAL COMMISSION DUE.	\$ 45.15

88040575019

CK# 3088
5/23/83
\$308.77



(301) (301) 688-6100

① 1/18/83

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C.

A/P - LIST RENTAL ORDER 301-005

Date 1/4/83

Mailer: American Printing House f/t Blind

Maildate: 2/14/83

10,200 TRULY @ \$12.50/M Commission \$ 127.50

Less 5,000 names @ 1.5¢/each for
initial keypunching costs to
Heyman Consulting Group (75.00)

TOTAL COMMISSION DUE: \$ 52.50

88040675020

RECEIVED APR 4 1983



(301) (301) 688-8163

① 1/18/83

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C.

A/P - LIST RENTAL ORDER 301-014

Date 1/7/83

Mailer: St. Labre

Maildate: 3/14/83

5,140 TRULY @ \$12.50/M Commission \$ 64.25

Less 2,500 names @ 1.5¢/each for
initial keypunching costs to
Heyman Consulting Group (37.50)

TOTAL COMMISSION DUE. \$ 26.75

88040575021

RECEIVED APR 11 1983



(301) (301) 626-6103

Ⓜ 1/18/83

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C.

A/P - LIST RENTAL ORDER 301-015

Date 1/7/83

Mailer: St. Labre

Maildate: 3/14/83

5,340 NICE @ \$11.25/M Commission \$ 60.08

Less 2,500 names @ 1.5¢/each for
initial keypunching costs to
Heyman Consulting Group (37.50)

TOTAL COMMISSION DUE. \$ 22.58

RECEIVED APR 11 1983

RECEIVED APR 11 1983

88040575022



(301) (301) 698-8103

② 1/31/83

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C. 20009

A/P - LIST RENTAL ORDER 301-016

Date 1/7/83

Mailer: St. Labre Maildate: 3/14/83

5,140 Committed @ \$11.25/M Commission
\$57.83

Less 2,500 names @ 1.5¢/each for
initial keypunching costs to
Heyman Consulting Group (37.50)

TOTAL COMMISSION DUE. \$20.33

83040575023

RECEIVED APR 11 1983



(301) (301) 688-5163

② 1/31/83

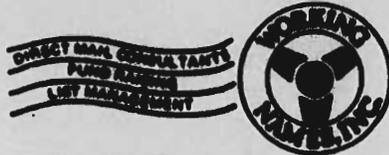
John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C. 20009

A/P - LIST RENTAL ORDER 301-034

Date 1/19/83
Mailer: Project Hopes Maildate: 3/21/83
5/M Truly @ \$12.50/M Commission \$ 62.50
Less 2,500 names @ 1.5¢/each for
initial keypunching costs to
Heyman Consulting Group (37.50)
TOTAL COMMISSION DUE. \$ 25.00

RECEIVED APR 11 1983

8 3 0 4 0 5 7 5 0 2 4



(301) (301) 888-8103

Ⓟ 1/31 /83

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C. 20009

A/P - LIST RENTAL ORDER #301-040

Date 1/21/83

Mailer: RNC

Maildate: 2/21/83

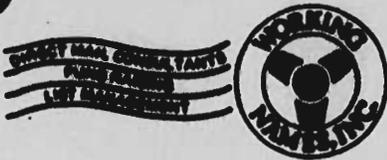
5,100 Nice @ \$11.25/M Commission \$ 57.38

Less 2,500 names @ 1.5¢/each
for initial keypunching costs to
Heyman Consulting Group (37.50)

TOTAL COMMISSION DUE. \$ 19.88

RECEIVED APR 22 1983

88040675025



(301) (301) 686-8100

Ⓟ 2/26/83

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C. 20009

A/P - LIST RENTAL ORDER 301-050

Date 1/31/83

Mailer: RNC

Maildate: 2/28/83

5,100 TRULY @ \$12.50/M Commission \$ 63.75

Less 2,500 names @ 1.5¢/each for
initial keypunching costs to

Heyman Consulting Group

(37.50)

TOTAL DUE THIS INVOICE

\$ 26.25

88040675020

RECEIVED APR 22 1983

SECRET MAIL GENERAL SERVICE
FUND RAISING
LIST MANAGEMENT



(201) (201) 698-8103

② 3/11/83

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C. 20009

A/P - LIST RENTAL ORDER 302-027

Date 2/18/83

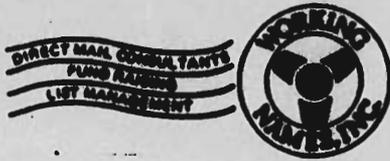
Mailer: Am. Family Assoc. Maildate: 4/11/83

5/M TRULY @ \$12.50/M Commission \$ 62.50

Less 2,500 names @ 1.5¢/each for
initial keypunching costs to
Heyman Consulting Group (37.50)

TOTAL DUE THIS INVOICE. \$ 25.00

89040575027



(301) (301) 686-6103

3/11/83

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C. 20009

A/P - LIST RENTAL ORDER 302-045

Date 2/24/83
Mailer: Moral Majority Maildate: 3/6/83

5/M TRULY @ \$12.50/M Commission	\$ 62.50
Less:	
2,500 names @ 1.5¢/each for initial keypunching costs to Heyman Consulting Group	(37.50)

TOTAL DUE THIS INVOICE. \$ 25.00

88040675028

RECEIVED APR 28 1983



(301) (301) 686-6100

② 3/11/83

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C. 20009

A/P - LIST RENTAL ORDER 302-058

Date 2/28/83
Mailer: Moral Majority Maildate: 3/21/83
5,140 NICE @ \$11.25/M Commission \$ 57.83
Less 2,500 names @ 1.5¢/each for
initial keypunching costs to
Heyman Consulting Group (37.50)
TOTAL DUE THIS INVOICE. \$ 20.33

88040675029

RECEIVED APR 28 1983



(301) (301) 688-5100

④ January 18, 1983

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C.

A/P - LIST RENTAL ORDER 212-031

Date 12/21/82

Mailer: USO

Maildate: 1/10/83

5,241 TRULY @ \$12.50/M Commission \$ 65.51

Less 2,500 names @ 1.5¢²⁴ each for
initial keypunching costs to
Heyman Consulting Group

(37.50)

TOTAL COMMISSION DUE. \$ 28.01

CMH/CORRECT CHGS - 5/3/83 < 12.50 >

\$ 15.51

88040575030

pd. \$307.50
Ch. #3268 8/15/83

RECEIVED MAY 12 1983



(301) (301) 888-5103

Ⓟ 1/31/83

John Whitehead
2006 Columbi Road, Apt. 20
Washington, D.C. 20009

A/P - LIST RENTAL ORDER 301-038

Date 1/24/83

Mailer: PVA Maildate: 2/21/83

10,080 Nice @ \$11.25/M Commission \$ 113.40

Less 5/M names @ 1.5¢/each for ^{2¢}
initial keypunching costs to
Heyman Consulting Group (75.00)

TOTAL COMMISSION DUE. \$ 38.40

CAM/Correct CHGS - 5/21/83 < 25.- >

~~25~~ 13.40

RECEIVED JUN 13 1983

PO # 307.50
Ch # 3068 8/15/83

88040675031



(301) (301) 698-5103

Ⓟ 2/26/83

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C. 20009

A/P - LIST RENTAL ORDER 301-046

Date 1/27/83

Mailer: NRTW-LDF

Maildate: 3/21/83

5,100 TRULY @ \$12.50/M Commission \$ 63.75

Less 2,500 names @ 1.50^{2¢} each for
initial keypunching costs to
Heyman Consulting Group (37.50)

TOTAL DUE THIS INVOICE. \$ 26.25

CM/ correct CUGS - 5/31/83 < 12.50 >
\$ 13.75

RECEIVED JUN 23 1983

\$ 367.50
8/15/83 ck # 8268

88040575032



(301) (301) 898-8103

③ 2/26/83

John Whitehead
2006 Columbia Road, Apt 20
Washington, D.C. 20009

A/P LIST RENTAL ORDER 302-017

Date 2/8/83

Mailer: POW-MIA

Maildate: 3/28/83

5,065 NICE @ \$11.25/M Commission \$ 56.98

Less 2,500 names @ 1.5¢ each for
initial keypunching costs to
Heyman Consulting Group

37.50

TOTAL DUE THIS INVOICE. \$ 19.48

CRM/CORRECT CHGS - 5/21/83 <12.50>
\$ 6.98

RECEIVED JUN 1 1983

pd. \$307.50
Chk # 3208 8/15/83

89040575033



(301) (301) 688-5103

① 3/11/83

John Whitehead
2006 Columbia Rd., Apt. 20
Washington, D.C. 20009

A/P - LIST RENTAL ORDER 302-018

Date 2/8/83

Mailer: POW-MIA

Maildate: 3/21/83

5,100 TRULY @ \$12.50/M Commission \$ 63.75

Less 2,500 names @ 1.5¢^{2¢} each for
initial keypunching costs to
Heyman Consulting Group (37.50)

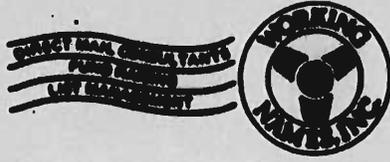
TOTAL DUE THIS INVOICE. \$ 26.25

CRM/ CORRECT CHGS - 5/31/83 < 12.50 >
\$ 13.75

PO # 30750
CH # 3268 8/15/83

RECEIVED MAR 23 1983

88040575034



(301) (301) 686-5103

Ⓟ 2/26/83

John Whitehead
2006 Columbia Road, Apt 20
Washington, D.C. 20009

A/P - LIST RENTAL ORDER 302-019

Date	2/8/83	
Mailer:	3/28/83	Maildate: 3/28/83
5/M TRULY @ \$12.50/M Commission		\$ 62.50
Less 2,500 names @ 1.5¢ each for initial keypunching costs to Heyman Consulting Group		(37.50)
TOTAL DUE THIS INVOICE.		\$ 25.00

CRM/Correct charges - 5/31/83 <12.50>
\$12.50

RECEIVED JUN 7 1983

pd. \$367.50 Ch. #3268
8/15/83

8 9 0 4 0 6 7 5 0 3 5



(301) (301) 688-8183

① 3/31/83

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C. 20009

A/P - LIST RENTAL ORDER 302-040

Date 2/24/83

Mailer: ADPAC

Maildate: 3/2/83

5,100 COMMITTED @ \$11.25/M Commission \$ 57.38

Telemetering @ \$3.75/M Commission 19.13

Less 2,500 names @ 1.50^{2¢} each for
initial keypunching costs to
Heyman Consulting Group

(37.50)

TOTAL DUE THIS INVOICE. \$ 39.01

C.M./CORRECT CHGS - 5/31/82 < 12.50 >

\$ 26.51

88040675036

40 \$367.50 Chk #3218
8/15/83

RECEIVED JUN 14 1983



(301) (301) 698-6183

② 3/11/83

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C. 20009

A/P - LIST RENTAL ORDER 302-044

Date 2/24/83
Mailer: NRSC

*Maildate: 4/4/83

5,140 NICE @ \$11.25/M Commission \$ 57.83

Less 2,500 names @ 1.5¢^{2¢} each for
initial keypunching costs to
Heyman Consulting Group (37.50)

TOTAL DUE THIS INVOICE. \$ 20.33

CRM/CORRECT CHANGES - 5/21/83 < 12.50 >
AB 7.83

*Maildate changed from original order.

88040675037

RECEIVED MAY 25 1983

cpd. \$367.50
ck. # 3268
8/15/83



(301) (301) 698-6108

3/31/83

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C. 20009

A/P - LIST RENTAL ORDER 303-025

Date 3/17/83

Mailer: ADPAC

Maildate: 3/16/83

5/M COMMITTED @ \$11.25/M Commission \$ 56.25

Telemetering @ \$3.75/M Commission 18.75

TOTAL DUE THIS INVOICE. \$ 75.00

CRM/APPLY O/P DUE TO
CHANGE IN KEY PUNCHING
RATE FROM 1.54/NAME
TO 2¢/NAME

< 37.11 >

Balance Due

\$ 37.89

Ypl. \$367.50
Chk # 3568
8/15/83

RECEIVED JUN 14 1983

88040675038



(301) (301) 698-5163

Ⓟ 03/31/83

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C. 20009

A/P - LIST RENTAL ORDER #303-026

Date: 3/17/83
Mailer: Mem.Sloan-Kettering Maildate: 5 /16/83

5,100 TRULY @ \$12.50/M Commission \$ 63.75

TOTAL DUE THIS INVOICE. \$ 63.75

RECEIVED JUN 24 1983

RECEIVED JUN 24 1983

*PO. \$367.50
@ # 3068
8/15/83*

88040675039



(301) (301) 688-5103

① 3/31/83

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C. 20009

A/P - LIST RENTAL ORDER 303-027

Date 3/17/83

Mailer: Mem.Sloan-Kettering

Maildate: 5/16/83

5,070 NICE @ \$11.25/M Commission

\$ 57.04

TOTAL DUE THIS INVOICE. \$ 57.04

RECEIVED JUN 24 1983

*YPO \$367.50
Ch. #3268
8/15/83*

8 8 0 4 0 5 7 5 0 4 0



(301) (301) 696-6103

Ⓟ 3/31/83

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C. 20009

A/P - LIST RENTAL ORDER 303-029

Date 3/17/83

Mailer: Mem.Sloan-Kettering Maildate: 5/16/83

5,100 COMMITTED @ \$11.25/M Commission \$ 57.38

TOTAL DUE THIS INVOICE \$ 57.38

RECEIVED JUN 24 1983

pd. \$ 367.50
ck. # 3068
8/15/83

88040575041



(301) (301) 696-6103

April 29, 1983

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C. 20009

A/P - LIST RENTAL ORDER 303-038

Date 3/25/83

Mailer: RNC

Maildate 4/25/83

30,330 NICE @ \$11.25/M Commission \$ 341.21

15,000 names @ 1.5¢/each for
initial keypunching costs to
Heyman Consulting Group (225.00)

TOTAL DUE THIS INVOICE. \$ 116.21

CRM/CORRECT CHGS - 5/31/83 < 75.00 >
\$ 41.21

RECEIVED JUN 23 1983

JPC \$367.50
Ch. # 3268
8/15/83

89040575042

Whitehead

5,003 Committed @ \$11.25/M Comm = \$56.95
Selling @ \$3.75/M

18.98
75.93

Ortal

#308-008
8/9/83
ADPAC

RECEIVED AUG 8 1983
8/9/83

Whitehead
10/28/83
Ch # 3418
003
75.93 +
78.00 +
163.49 +
317.42

(P) 8/18/83

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WORK
4421A E
Bohards

INSTRUCTION ORDER

PLEASE FILL OUT AND MAIL THIS CARD ON
COMPLETION OF ADDRESSING.

DATE:

308-001 MAILER ADPAC

MAILER

CL KEY

SHIPPED 8/22/83 VIA UPS

5200 Shpg. Chgs: 1.50

COMPANY MCG BY VKH

WORKING NAMES IN AD-
FILLMENT OF ANY VARIA-
ES, OR ADDITIONAL COSTS
ED ON THIS ORDER.

representative cross section of the

"Nth" name selection of the entire

as indicated below.

used form, please send WN a State

names supplied.

Please omit names previously used on

KEEP A RECORD OF NAMES SUPPLIED TO AVOID
DUPLICATION ON FUTURE ORDERS. Address USA names
only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is.,
Canada & Foreign unless specified. PLEASE USE
SHIPPING LABELS ENCLOSED WHEN SHIPPING AD-
DRESSED MATERIAL. Fill in and return postal card enclos-
ed upon completion of this order ALL NAMES MUST BE
IN ZIP CODE NUMERICAL SEQUENCE. Maintain cor-
rect sequence of list when packing for shipment PLEASE
NUMBER CARTONS ACCORDINGLY. Mailer name, order
number, key, list name and quantity to appear on all
packages

In accepting this order, it is acknowledged that
WN is an agent of the mailer/broker/owner and
is not liable for uncollected accounts.

FURNIS
NAMES

SHIP BY:

MUST BE RECEIVED BY:

FOR MAILING ON:

SHIP VIA:

SHIP
TO

QUANTITY

LIST

KEY

PER M

88040575044

#308-001

Myanmar: 11.25
5,200 @ \$11.25/M = \$58.50
TELEMARKETING @ \$3.75/M = 19.50
P.S. LABELS @ \$10/M = 52.00
S & H 7.50
Total \$137.50

RECEIVED AUG 22 1983

8/31/83

Whitehead:
5,200 @ \$11.25/M = \$58.50
TELEMARKETING @ \$3.75/M = 19.50
TOTAL \$78.00

FOR ALL QUESTIONS ON THIS ORDER CALL

(301) 656-5103

WORKING NAI
4421A East-West H
Bethesda, Maryland

CTION ORDER

DATE: 309-034 ADPAC

MAILER: CL
9/19
10900
HCG V.K.H.

IG NAMES IN AD-
T OF ANY VARIA-
TIONAL COSTS
S ORDER.

FURNISH
NAMES ON:

SHIP BY:

MUST BE RECEIVED BY:

FOR MAILING ON:

SHIP VIA:

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TO

Please omit names previously used on

KEEP A RECORD OF NAMES SUPPLIED TO AVOID
DUPLICATION ON FUTURE ORDERS. Address USA names
only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is.
Canada & Foreign unless specified. PLEASE USE
SHIPPING LABELS ENCLOSED WHEN SHIPPING AD-
DRESSED MATERIAL. Fill in and return postal card enclos-
ed upon completion of the order. ALL NAMES MUST BE
IN ZIP CODE NUMERICAL SEQUENCE. Maintain cor-
rect sequence of list when packing for shipment. PLEASE
NUMBER CARTONS ACCORDINGLY. Mailing name, order
number, key, list name and quantity to appear on all
packages.

In accepting this order, it is acknowledged that
WN is an agent of the mailer/broker/owner and
is not liable for uncollected accounts.

83040575045

QUANTITY LIST KEY PER M

RECEIVED SEP 21 1983

#309-034 9/19/83 (P) 9/19/83

Myman:
10,900 CL @ \$11.25/M COMM = \$122.62
Telemarketing @ \$3.75/M 40.81
PRESSURE SENSITIVE LABELS @ \$10/M 109.00
TOTAL \$ 272.44

10,900 @ \$4.15/M = \$450.50
Telemarketing @ \$1.5/M 163.50
P.S. Labels @ \$10/M 109.00
TOTAL \$723.00

Whitehead:
10,900 CL @ \$11.25/M COMM = \$122.62
TELEMARKETING @ \$3.75/M 40.81

Less credit balance on <24.10>
Net
Bal Due \$ 738.90

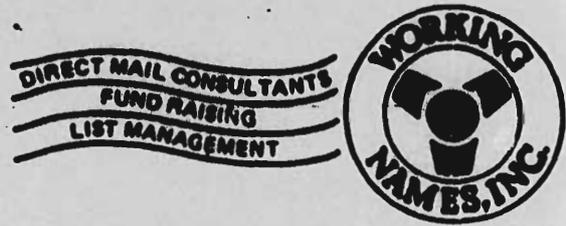
TOTAL \$ 163.49 FOR ALL QUESTIONS ON THIS ORDER CALL

(301) 656-5103

WORKING NAMES, INC.

11600 Bolling Brook Place
Rockville, Maryland 20852

301/231-8001



April 3, 1984

John Whitehead
2006 Columbia Road, N.W.
Apt. #20
Washington, D.C. 20009

A/P - PAYMENT ADVICE

Check #3982
Amount: \$1,030.15

88040575046

<u>LRO#</u>	<u>AMOUNT</u>
307-042	\$ 63.75
307-043	57.37
307-050	61.96
307-055	63.75
307-058	63.75
307-063	63.75
308-001	57.37
308-005	129.66
308-006	135.77
309-026	59.34
309-028	17.57
307-030	63.75
307-046	63.75
308-018	64.86
308-019	<u>63.75</u>

TOTAL COMMISSION DUE \$1,030.15

WORKING NAMES, INC.

11000 Bolling Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



May 10, 1984

John Whitehead
2006 Columbia Road, N.W.
Apt. #20
Washington, D.C. 20009

A/P - PAYMENT ADVICE

Check #4109
Amount: \$2,804.16

8 8 0 4 0 6 7 5 0 4 7

<u>LRO#</u>	<u>AMOUNT</u>
308-024	\$127.50
308-025	65.25
308-027	63.75
308-028	64.25
308-029	63.75
308-030	127.36
308-032	75.00
308-033	77.62
308-038	57.37
308-042	315.00
308-043	63.75
308-048	95.25
308-050	63.75
308-051	63.75
308-053	63.75
308-054	189.37
308-065	127.43
308-066	63.75
308-079	63.75
308-080	127.50
308-081	127.50
308-082	405.00
308-094	62.50
308-103	63.65
308-105	65.96
308-106	58.03
308-107	64.60
	<u>\$2,806.14</u>

LESS: Net Name Adjustment for
#307-025, paid 1/20/84,
check #3731 - 1.98
TOTAL COMMISSION DUE.....\$2,804.16

WORKING NAMES, INC.

11600 Bolling-Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



June 28, 1984

John Whitehead
2006 Columbia Road, N.W.
Apt. #20
Washington, D.C. 20009

A/P - PAYMENT ADVICE

Check #4281
Amount: \$2,047.84

88040675048

<u>LRO#</u>	<u>AMOUNT</u>
308-016	\$ 57.37
308-108	64.06
308-109	62.50
308-113	63.61
308-124	127.50
309-001	544.73
309-004	63.75
309-009	63.92
309-017	443.11
309-021	63.87
309-031	126.58
309-038	531.37
309-041	64.43
309-042	64.41
309-043	131.25
309-049	58.60
309-070	63.75
310-002	131.25
310-004	63.78
TOTAL.....	\$2,789.84

LESS: LEGAL FEES.....- 242.00*
COMPUTER CHARGES...- 500.00**

BALANCE DUE.....\$2,047.84

*1/3 of payment sent to Kaswell, Perazich & Watson on 6/12/84
(see attached) (CK#4241)

**Partial payment to Heyman Consulting Group for computer services.

WORKING NAMES, INC.

11600 Bolling Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



August 7, 1984

John Whitehead
2006 Columbia Road, N.W.
Apt. #20
Washington, D.C. 20009

A/P - PAYMENT ADVICE

Check #4417
Amount: \$2,037.67

83040675049

<u>LRO#</u>	<u>AMOUNT</u>
306-006	\$317.50
306-047	57.38
307-035	240.97
307-048	32.61
307-049	32.61
308-057	267.75
309-040	128.66
309-069	57.37
310-018	710.75
310-039	64.54
310-040	63.78
310-042	<u>63.75</u>

TOTAL COMMISSION DUE.....\$2,037.67

WORKING NAMES, INC.

11000 Bolling Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



September 10, 1984

John Whitehead
2006 Columbia Road, N.W.
Apt. #20
Washington, D.C. 20009

A/P - PAYMENT ADVICE

Check #4524
Amount: \$1,515.52

8 3 0 4 0 6 7 5 0 5 0

<u>LRO#</u>	<u>AMOUNT</u>
310-011	\$137.03
310-014	319.87*
310-020	64.10
310-021	64.45
310-045	63.75
310-064	64.61
310-065	62.96
310-066	64.80
310-068	63.75
311-002	65.83
311-003	64.81
311-005	130.81
311-006	63.05
311-014	56.98
311-015	63.75
311-028	107.60
311-029	<u>57.37</u>

TOTAL COMMISSION DUE..\$1,515.52

*Invoice #310-014-adjusted for net name billing.

WORKING NAMES, INC.

11600 Bolling Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



October 11, 1984

John Whitehead
2006 Columbia Road, N.W.
Apt. #20
Washington, D.C. 20009

A/P - PAYMENT ADVICE

Check #4616
Amount: \$2,034.40

<u>LRO#</u>	<u>AMOUNT</u>
311-020	\$402.75
311-025	377.62
311-026	315.00
311-037	<u>939.03*</u>
TOTAL COMMISSION DUE	\$2,034.40

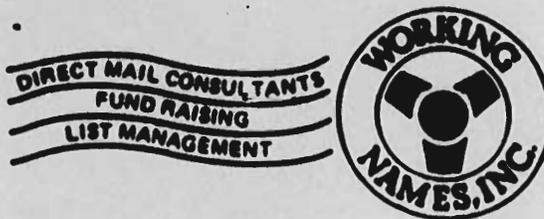
*Invoice #311-037 adjusted for net name billing.

88040675051

WORKING NAMES, INC.

11600 Bolling Brook Place
Rockville, Maryland 20852

301/231-8001



November 1, 1984

John Whitehead
2006 Columbia Road, N.W.
Apt. #20
Washington, D.C. 20009

A/P - PAYMENT ADVICE

Check #4689
Amount: \$3,010.02

<u>LRO#</u>	<u>AMOUNT</u>
311-085	\$882.83*
312-002	430.31*
401-017	843.55
401-058	<u>853.33*</u>

TOTAL COMMISSION...\$3,010.02

*These invoices were adjusted for net name billing.

83040575052

WORKING NAMES, INC.

11600 Bolling Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



November 30, 1984

John Whitehead
2006 Columbia Road, N.W.
Apt. #20
Washington, D.C. 20009

A/P - PAYMENT ADVICE

Check #4790
Amount: \$2,152.64

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<u>LRO#</u>	<u>AMOUNT</u>
311-008	\$ 63.75
311-010	63.92
311-022	64.10
311-023	63.75
311-031	114.41
311-040	126.36
311-041	125.00
311-045	64.14
311-049	95.25
311-050	95.25
311-061	18.26
311-079	64.40
312-007	127.50
312-008	336.09
312-009	566.18
312-012	63.75
312-013	64.40
312-014	63.75
312-015	127.50
312-021	76.51
312-030	141.25
312-032	127.12
TOTAL.....	\$2,652.64
LESS: COMPUTER CHARGES	
PAID TO HEYMAN CONSULTING	
GROUP, CK#4773, 11/26/84 -	500.00
BALANCE DUE.....	\$2,152.64

WORKING NAMES, INC.

11600 Bolling Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



January 4, 1985

John Whitehead
2006 Columbia Road, N.W.
Apt. #20
Washington, D.C. 20009

A/P - PAYMENT ADVICE

CHECK #4905
AMOUNT: \$2,119.68

3 3 0 4 0 6 7 5 0 5 4

<u>LRO#</u>	<u>AMOUNT</u>
307-037	\$ 63.75
306-005	75.75
308-039	63.75
308-058	63.75
308-098	63.75
308-100	18.31
309-013	71.40
309-015	76.36
309-024	63.75
309-025	64.12
309-067	600.00
310-005	59.47
401-005	18.89
401-009	63.75
401-019	63.75
401-020	63.75
401-035	608.54
401-030	63.75
401-041	76.51
401-045	63.75
401-046	63.92
401-047	64.46
401-050	56.95
401-055	127.50
TOTAL COMMISSION DUE.....	\$2,619.68
LESS: COMPUTER CHARGES PAID	
TO HEYMAN CONSULTING GROUP....	500.00
BALANCE DUE.....	\$2,119.68

WORKING NAMES, INC.

11800 Bolling Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



January 29, 1985

John Whitehead
2006 Columbia Road, N.W.
Apt. #20
Washington, D.C. 20009

A/P - PAYMENT ADVICE

Check #5006
Amount: \$2,115.30

88040675052

<u>LRO#</u>	<u>AMOUNT</u>
310-015	\$ 57.37
312-042	63.75
312-048	127.50
312-052	69.70
312-053	64.20
312-055	59.49
312-061	63.75
312-063	63.30
312-064	57.37
401-006	872.50
401-007	427.62
401-064	188.75
TOTAL COMMISSION DUE.....	\$2,115.30

TR 8 9 0 4 0 3 / 5 1 0 5 0 R V T I V E S

Model	Month/Year	Quantity	Unit Price	WN #	DATE PAID	check #	AMOUNT RECEIVED
Memorial Kettering Center	1/2/84	25,000	12.50	311-006	10/11/84	4214	315.00
American Bible Society	10/17/83	5,000	2.50	301-030	4/15/84	3982	63.75
Natl League Now	11/17/83	10,000		308-005	4/15/84	3982	127.46
Save the Children Education	7/26/83	5,000		306-106	10/18/84	4201	64.06
Moral Majority	10/11/83	10,000		309-001	10/18/84	4201	126.58
Diabetes Trust Fund	11/14/83	5,000		309-004	10/18/84	4201	63.75
Coronary Heart Disease	10/26/83	80,000	3.75	310-018	8/17/84	4407	710.75
Johns Hopkins BoysTown	10/28/83	5,000	12.50	307-049	8/17/84	4417	39.01
NRW	10/17/83	25,000		308-057	8/17/84	4417	467.75
the Shavano Institute	10/10/83	10,000		301-040	8/17/84	4417	139.40
MEDIA Institute	7/4/83	25,000		304-006	8/17/84	4417	372.50
USO	2/20/84	20,000		312-008	11/30/84	4178	334.09
NRSC	7/26/84	5,000		308-108	5/10/84	4109	63.65
Bob Hope Heart Research	10/5/83	10,000		308-090	5/10/84	4109	127.50
Dull Knife Mem. College	10/31/83	10,000		308-005	5/10/84	4109	127.43
American Foundation for the Blind	11/7/83	15,000		308-054	5/10/84	4109	187.37
Deafness Research Foundation	10/24/83	5,000		308-007	5/10/84	4109	43.75
American Bible Society	4/22/85	20,000		300-087			
Colonial Williamsburg	4/1/85	15,000		301-212			
R. Reagan Scholarship	3/25/85	5,000		303-213			
NRSC	2/11/85	7,500		301-203			
Alzheimer Disease	2/13/85	9,000		301-211			
Memorial Sloan Kettering	3/4/85	25,000		304-204			
Coalition for Freedom	5/6/85	5,000		304-204			
Covenant House	4/4/83	5,000		301-215			
American Union of CA Canceled	2/19/85	5,000		301-			
Amer. Ind. for the Blind	4/1/83	5,000		300-024			
Media Institute	3/28/83	5,000		303-018			
NRSC	4/18/83	7,500		303-022			
Nat'l Right to Life	5/11/83	5,000		303-008			
NRSC	10/10/83	5,000		309-004			
Conservative Against Lib. League	11/21/83	5,000		310-021			
Fund for a Conservative Majority	11/21/83	10,000		310-011			
Council for Inter Amer. Security	10/31/83	5,000		312-045			
Jackson Edge Fund	7/10/84	5,000		312-053	11/21/85	5000	69.20
Colonial Williamsburg	2/6/84	5,000		312-042	1/16/85	5000	65.75
POW/MIA	retaining	all		121			

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TRULY CONSERVATIVE #/PC# 0 6 7 5 0 5 7

Master	Mail Date	Quantity	Per / M \$	WN #	DATE PAID	Check #	Amount Received
Natl Republican Senatorial Comm	2/10/84	15,000	12.50	401-055			
Am. Natl. For the Blind	3/5/84	10,000	"	401-069	8/14/85	5000	127.50
Natl Republican Senatorial Comm	2/10/84	71,000	"	401-006	1/27/85	5000	272.50
World Vision	3/12/84	19,000	"	401-084	3/23/85	3000	112.50
Peoples Medical Society	2/10/84	5,000	"	401-019			
Republican National Comm.	4/2/84	5,000	"	403-019			
Diabetes Research Foundation	4/30/84	5,000	"	403-011			
Diabetes Trust Fund	4/9/84	19,000	"	402-079	4/29/85	5305	316.75
Natl Republican Senatorial Comm.	3/19/84	58,000	"	402-044	2/24/85	5105	734.93
American Bible Society	9/25/84	5,000	"	402-021	4/20/85	5105	51.00
Young Americans for Freedom	4/9/84	5,000	"	403-045	3/21/85	5200	62.75
Americares Foundation	3/31/84	5,000	"	403-022	3/20/85	5200	63.75
St. Labre	6/25/84	15,000	"	403-062	4/29/85	5305	191.25
DIABETES Trust Fund	6/10/84	20,000	"	404-040			
NCPAC	5/21/84	3,000	"	404-065			
NCPAC	5/21/84	3,000	"	404-066			
NCPAC	5/21/84	3,000	"	404-067			
Bob Hope Heart Institute	5/28/84	25,000	"	404-068	6/6/85	5441	318.75
American Tax Reduction Movement	6/12/84	5,000	"	404-076			
Amer. Foundation for the Blind	9/10/84	10,000	"	406-002			
Coalition for Freedom	8/2/84	5,000	"	409-012			
Citizens for America	8/27/84	5,000	"	409-011			
American Christian Heritage	8/27/84	5,000	"	408-002			
Palmer, Margaret's Boys Team	10/31/84	50,000	"	409-004			
USO	7/23/84	10,000	"	406-000			
Anderson Cancer Research Inst.	10/1/84	10,000	"	407-007			
Alliance for Senior Citizens	8/6/84	82,000	"	407-002			
NRSC	9/17/84	82,000	"	409-010			
Campaign for Prosperity	10/1/84	5,000	"	408-020			
BEREA College	4/20/83	5,000	"	305-018	1/24/85	3576	13.99
NRSC	5/16/83	7,000	"	305-009	1/24/85	3576	112.50
Coronary Heart Disease	6/27/83	5,000	"	305-013	1/24/85	3576	12.88
American Lung Assoc Foundation	7/5/83	5,000	"	306-004	1/24/85	3576	45.09
Natl Foundation for Cancer Research	7/25/83	10,000	"	306-008	1/24/85	3576	64.51
Moral Majority	5/30/83	48,000	"	304-004	1/24/85	3576	160.50
Guiding Eyes for the Blind	4/11/83	15,000	"	303-015	11/24/85	3700	47.65
GOVERNMENT HOUSE	10/10/83	25,000	"	507-051	1/20/85	3701	57.50
USO	9/5/83	45,000	"	307-005	1/20/85	3701	57.50
Instructors Against Liberal Legis.	1/18/83	5,000	"	306-003	2/14/85	3705	46.75

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WORKING NAMES, INC.

4421A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 1/07/83

WN ORDER NO.: 301-014

BROKERS NUMBER: D8830 ~ 1

MAILER: ST LABRE INDIAN SCHOOL OFFER: FUNDRAISING

HEYMAN CONSULTING GROUP, INC.
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

FURNISH NAMES ON: Magnetic Tape 9TK 1600 BPI
Supply Dump & Layout

SHIP BY: 01/13/83

MUST BE RECEIVED BY: 01/17/83

FOR MAILING ON: 03/14/83

SHIP VIA: UPS

SATURN CORPORATION
4701 LYDELL ROAD
CHEVERLY, MD 20781

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

LIST

- Please address a representative cross section of the entire list
- Please address an Nth name selection of the entire list
- Please address as indicated below
- Using the enclosed form, please send WN a State count of names supplied
- Please omit names previously used on

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key list name and quantity to appear on all packages.

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

QUANTITY	LIST	KEY	PER M
5000	TRULY CONSERVATIVE DONORS		12.50

PLEASE NOTE THAT TAPE MUST BE RECEIVED BY 1/24/83 AT THE LATEST TO MEET PRICE/PURGE DEADLINE.

FOR ALL QUESTIONS ON THIS ORDER CALL

(301) 656-5103



WORKING NAMES, INC.
11600 Bolling Brook Place
Rockville, Maryland 20852

FULFILLMENT INSTRUCTION ORDER

DATE: 02/25/85

WN ORDER NO: 302-037

BROKERS NUMBER

MAILER: AMERICAN BIBLE SOCIETY

OFFER: G. P. #2/85

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

ASTECH CORPORATION
1621 CONNECTICUT AVE., N.W.
WASHINGTON, D.C. 20009-1076
ATTN: STUART E. CLAYMAN

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State count of names supplied.
- Please omit names previously used on

FURNISH NAMES ON: Magnetic Tape 9TK 1600 BPI
Supply Dump & Layout

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

SHIP BY: 02/12/85

MUST BE RECEIVED BY: 02/15/85

FOR MAILING ON: 04/22/85

SHIP VIA: UPS BLUE

SHIP TO: MARKET DEVELOPMENT CORP
41 KIHLER
HAZELWOOD, MD 63043D
JAY JOB#3002

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

QUANTITY	LIST	KEY	PER M
----------	------	-----	-------

20000 TELLY CONSERVATIVE DONORS

PLEASE MARK TAPE AND PACKAGE KEY 089674/JOB # 3002
SALT INITIALS

FOR ALL QUESTIONS ON THIS ORDER CALL

(301) 291-8001



WORKING NAMES, INC.
11600 Boiling Brook Place
Rockville, Maryland 20852

FULFILLMENT INSTRUCTION ORDER

DATE: 01/28/85

WN ORDER NO: 501-212

BROKERS NUMBER: 01

MAILER: COLVIN ENGINEERING

OFFER: FR

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP
1706 LITTLE BLVD
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

FURNISH NAMES ON: Supply Dump & Layout

- LIST
- Please address a representative cross section of the entire list.
 - Please address an "Nth" name selection of the entire list.
 - Please address as indicated below
 - Using the enclosed form, please send WN a State court of names supplied.
 - Please omit names previously used on:

SHIP BY: 01/31/85
MUST BE RECEIVED BY: 02/04/85
FOR MAILING ON: 01/31/85
SHIP VIA: AIR MAIL

SHIP TO: VEDVA AND ASSOCIATES
1101 INTERNATIONAL PARKWAY
FALLS CHURCH, VA 22041
0014 0001

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only — Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is. Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

QUANTITY LIST KEY PER M

***PLEASE OMIT IF POSSIBLE AND FOR USE OF...
LEFT INITIALS
CONFIRMATION OF A TELEPHONE ORDER. PLEASE TO...



WORKING NAMES, INC.
 11600 Bolling Brook Place
 Rockville, Maryland 20852



FULFILLMENT INSTRUCTION ORDER

DATE: ^{MAY} ~~APRIL~~ 1, 1985

WN ORDER NO.: WN 121

BROKERS NUMBER:

MAILER: ~~BIXENBEEK~~
 POW MIA

OFFER: fundraising

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

Aztech Corp
 1621 Connecticut Ave NW
 Washington DC 20009

Attn: Stuart Clayman

FURNISH NAMES ON: mag tape 1600 BPI
 dump and layout

SHIP BY: ASAP

MUST BE RECEIVED BY:

FOR MAILING ON: for telematching

SHIP VIA: UPS

SHIP TO: CCK
 130 Industrial Blvd
 Conway Arkansas 72032
 a ttn: Laura Middlecoff

- LIST
- Please address a representative cross section of the entire list.
 - Please address an "Nth" name selection of the entire list.
 - Please address as indicated below
 - Using the enclosed form, please send WN a State count of names supplied.
 - Please omit names previously used on

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is, Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

1
6
5
7
0
6
5
4
0
3
0
4
3

QUANTITY	LIST	KEY	PER M
ALL	ELITE CONSERVATIVE LEADERS		
ALL	HIGH CONSERVATIVE DONORS		
ALL	SOLID AMERICANS		

Please mark package for telematch. re: WN 121

FOR ALL QUESTIONS ON THIS ORDER CALL HARRIET HEYMAN
 (301) 231-8001



WORKING NAMES, INC.
11600 Bolling Brook Place
Rockville, Maryland 20852

CONFIRMATION

FULFILLMENT INSTRUCTION ORDER

DATE: 03/06/85 ORDER NO 503-013

BROKERS NUMBER

MAILER: RONALD REAGAN SCHOLARSHIP FUND
FR

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

AZTECH CORPORATION
1621 CONNECTICUT AVE., N.W.
WASHINGTON, D.C. 20009-1076
ATTN: STUART E. CLAMAN

FURNISH NAMES ON:

Magnetic Tape 9TR 1600 BPI
Supply Dump & Layout

SHIP BY:

MUST BE RECEIVED BY: 03/08/85

FOR MAILING ON: 03/11/85

SHIP VIA: 03/25/85

UPS

SHIP TO

COMPUTER COMMUNICATIONS
8330 OLD COURTHOUSE RD STE 120
VIENNA, VA 22180

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State count of names supplied.
- Please omit names previously used on.

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only — Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

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QUANTITY

LIST

KEY

PER M

5000 JULY CONSERVATIVE DONORS

1105

12.50

PLEASE KEY SHIPPING LABEL "NN05" ONLY.

SALT INITIALS

CONFIRMATION OF A TELEPHONE ORDER. PLEASE DO NOT DUPLICATE.



WORKING NAMES, INC.
 11600 Boiling Brook Place
 Rockville, Maryland 20852

FULFILLMENT INSTRUCTION ORDER

DATE: 01/02/85

WN ORDER NO: 501-203

BROKERS NUMBER: 2105

MAILER: RSC

OFFER: FR

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP
 1706 LORRE DRIVE
 ROCKVILLE, MD 20852
 ATTN: VICTOR HEYMAN

FURNISH NAMES ON: Magnetic Tape 9TK 1600 BPI
 Supply Dump & Layout

- LIST
- Please address a representative cross section of the entire list.
 - Please address an "Nth" name selection of the entire list.
 - Please address as indicated below.
 - Using the enclosed form, please send WN a State court of names supplied.
 - Please omit names previously used on:

SHIP BY: 01/16/85

MUST BE RECEIVED BY: 01/21/85

FOR MAILING ON: 02/11/85

SHIP VIA: SCS

SHIP TO: DRAWER COMMUNICATIONS
 2100 OLD COURTHOUSE RD. #120
 WASHINGTON, VA 22206

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only — Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

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QUANTITY LIST KEY PER M

PLEASE PRINT NAME AND ADDRESS OF MAILER/BROKER/OWNER.
 NAME AND ADDRESS OF MAILER/BROKER/OWNER.
 INITIALS

FOR ALL QUESTIONS ON THIS ORDER CALL



WORKING NAMES, INC.
 11600 Boiling Brook Place
 Rockville, Maryland 20852

FULFILLMENT INSTRUCTION ORDER

DATE: 01/22/85 WN ORDER NO: 501-211

BROKERS NUMBER: 164

MAILER: ALZHEIMER'S DISEASE OFFER: FR

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP
 1706 LORRE DRIVE
 ROCKVILLE, MD 20852
 ATTN: VICTOR HEYMAN

FURNISH NAMES ON: Magnetic Tape 9TK 1600 BPI
 Supply Dump & Layout

- LIST
- Please address a representative cross section of the entire list.
 - Please address an "Nth" name selection of the entire list.
 - Please address as indicated below
 - Using the enclosed form, please send WN a State count of names supplied.
 - Please omit names previously used on

SHIP BY: 01/30/85

MUST BE RECEIVED BY: 02/04/85

FOR MAILING ON: 02/15/85

SHIP VIA: UPS

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only — Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

SHIP TO: COMPUTER TASK GROUP
 3095 UNION ROAD
 ORCHARD PARK, NY 14127
 ATTN: RENT ROEBACH

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

QUANTITY LIST KEY PER M

5000 JULY CONSERVATIVE DONORS

SALT INITIALS

FOR ALL QUESTIONS ON THIS ORDER CALL



WORKING NAMES, INC.
 11600 Bolling Brook Place
 Rockville, Maryland 20852

FULFILLMENT INSTRUCTION ORDER

DATE: 04/22/85 WN ORDER NO.: 504-034
 MAILER: COALITION FOR FREEDOM OFFER: FR

BROKERS NUMBER: 337-04

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

AZTECH CORPORATION
 1621 CONNECTICUT AVE., N.W.
 WASHINGTON, D.C. 20009-1076
 ATTN: STUART E. CLAYMAN

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State count of names supplied.
- Please omit names previously used on

FURNISH NAMES ON: Magnetic Tape 9TK 1600 BPI
 Supply Dump & Layout

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is. Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

83040675060

SHIP BY: 04/22/85
 MUST BE RECEIVED BY: 04/25/85
 FOR MAILING ON: 05/06/85
 SHIP VIA: UPS OR BEST WAY

SHIP TO: COMPUTER COMMUNICATIONS
 8330 OLD COURTHOUSE BL., #120
 VIENNA, VA 22180
 ATTN:

QUANTITY LIST KEY PER M

1000 CONSERVATIVE DONORS

***BANK INITIALS: ***

FOR ALL QUESTIONS ON THIS ORDER CALL

Burbus Vargas
 (301) 261-0001

WORKING NAMES, INC.
4421A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 01/24/83

WN ORDER NO.: 301-043

BROKERS NUMBER: E1425J ~ 1

MAILER: COVENANT HOUSE

OFFER: FUNDRAISING

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP, INC.
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State count of names supplied.
- Please omit names previously used on:

FURNISH NAMES ON:

Magnetic Tape 9TK 1600 BPI
Supply Dump & Layout

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only — Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

SHIP BY:

02/07/83

MUST BE RECEIVED BY:

02/14/83

FOR MAILING ON:

04/04/83

SHIP VIA:

UPS

SHIP TO

METRO MAIL
11 EISENHOWER LANE SOUTH
LOMBARD, IL 60148
PAT ECKSTROM, #CV607

QUANTITY

LIST

KEY

PER M

5000 TRULY CONSERVATIVE DONORS

AMES

12.00

PLEASE MARK TAPE REEL LABEL WITH "CV607"

FOR ALL QUESTIONS ON THIS ORDER CALL

(301) 698-5103

WORKING NAMES, INC.

4421A East-West Highway
Bethesda, Maryland 20814

Confirmation

FULFILLMENT INSTRUCTION ORDER

DATE: 01/14/83

WN ORDER NO.: 301-030

BROKERS NUMBER: 11142

MAILER: AM CANCER OF CA

OFFER: FUNDRAISING

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP, INC.
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

FURNISH NAMES ON: Magnetic Tape 9TK 1600 BPI
Supply Dump & Layout

- LIST
- Please address a representative cross section of the entire list.
 - Please address an "Nth" name selection of the entire list.
 - Please address as indicated below.
 - Using the enclosed form, please send WN a State court of names supplied.
 - Please omit names previously used on:

SHIP BY: 01/19/83

MUST BE RECEIVED BY: 01/21/83

FOR MAILING ON: 02/14/83

SHIP VIA: UPS 2ND DAY AIR

SHIP TO: TRIPLEX DIRECT MARKETING
3135 KERNER BLVD
SAN RAFAEL, CA 94901
SHEILA MARTIN

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE... Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

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QUANTITY	LIST	KEY	PER M
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0 FULLY CONSERVATIVE DONORS

11.20

PLEASE SELECT NAMES FROM THE STATE OF CA ONLY

ORDER CANCELLED W/O PEN CHARGES - NAMES NOT AVAILABLE AT THIS TIME.

WORKING NAMES, INC.

4421A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 02/28/83

WN ORDER NO.: 302-056

BROKERS NUMBER: 22003J

MAILER: AM FND P/T BLIND

OFFER: FR

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP, INC.
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

FURNISH NAMES ON: Magnetic Tape 9TK 1600 BPI
Supply Dump & Layout

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State count of names supplied.
- Please omit names previously used on:

SHIP BY: 03/14/83

MUST BE RECEIVED BY: 03/16/83

FOR MAILING ON: 04/11/83

SHIP VIA: UPS

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. . . . Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

SHIP TO
PERSONALIZED MAILING SERVICE
200 STONEHEDGE LANE
CARLE PLACE, NY 11514
MS ELEANOR HARGIE

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

QUANTITY	LIST	KEY	PER M
5000	TRULY CONSERVATIVE DONORS	8301	12.50

PLEASE MARK REEL W/LIST NAME & ACTUAL QUANTITY

FOR ALL QUESTIONS ON THIS ORDER CALL

(301) 952-5193

WORKING NAMES, INC.

4421A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 3/10/83

WN ORDER NO.: 303-018

BROKERS NUMBER: 7

MAILER: MEDIA INSTITUTE

OFFER: FR

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP, INC.
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

FURNISH NAMES ON: 4-UP, Cheshire Labels

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State count of names supplied.
- Please omit names previously used on:

SHIP BY: 03/17/83

MUST BE RECEIVED BY: 03/21/83

FOR MAILING ON: 03/28/83

SHIP VIA: UPS

SHIP TO: ANN E. W. STONE & ASSOC., INC.
104-A S. COLUMBUS STREET
ALEXANDRIA, VA 22314

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only — Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

QUANTITY

LIST

KEY

PER M

2000 BILLY CONSERVATIVE DONORS

P118

11.00

PLEASE KEYCODE LABELS "P118"
SALT INITIALS:

FOR ALL QUESTIONS ON THIS ORDER CALL

(201) 856-6103

WORKING NAMES, INC.

4421A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 3/15/83

WN ORDER NO. 303-022

BROKERS NUMBER 3840 - 5

MAILER: NRSC

OFFER: FR

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP, INC.

1706 LOBRE DRIVE
ROCKVILLE, MD 20852

ATTN: VICTOR HEYMAN

FURNISH NAMES ON: Magnetic Tape 9IX 1600 EPI
Supply Dump & Layout

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State count of names supplied.
- Please omit names previously used on:

SHIP BY: 03/24/83

MUST BE RECEIVED BY: 03/28/83

FOR MAILING ON: 04/18/83

SHIP VIA: UPS

SHIP TO: PREFERRED LISTS INC
499 SOUTH CAPITOL ST, SW #504
WASHINGTON, DC 20003
CATHERINE GUERARD

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only — Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

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QUANTITY	LIST	KEY	PER M
----------	------	-----	-------

7500 TRULY CONSERVATIVE DONORS

10.00

SALT INITIALS:

PLEASE SHIP VIA UPS EXPRESS IF NECESSARY TO MEET REC'D. BY DATE.

FOR ALL ORDERS ON THIS ORDER CALL:

(301) 658-5103

WORKING NAMES, INC.

4421A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 03/07/83

WN ORDER NO.: 303-008

BROKERS NUMBER:

MAILER: NRTL COMMITTEE

OFFER: FR

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP, INC.
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State court of names supplied.
- Please omit names previously used on:

FURNISH NAMES ON: 4-UP Cheshire labels

SHIP BY: 03/30/83

MUST BE RECEIVED BY: 04/01/83

FOR MAILING ON: 05/01/83

SHIP VIA: UPS

SHIP TO: ENVELOPES UNLIMITED
655 N. HORNERS LANE
ROCKVILLE, MD 20850
BRUCE WACKEY

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only — Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

QUANTITY	LIST	KEY	PER M
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5000	ONLY CONSERVATIVE DONORS	732	12.50
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PLEASE KEY LABELS "732"

SALT INITIALS:

RETURN RECEIPT REQUESTED FOR UPS TO: MAIL RIGHT TO LIFE, 1102 N. LAFAYETTE BLVD, SOUTH BEND, IN 46617, ATT: DONNA

WORKING NAMES, INC.

4127A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 09/12/83

WN ORDER NO.: 309-024

BROKERS NUMBER: -

MAILER: NRSC

OFFER: FR

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

FURNISH NAMES ON **=4-UP CHESHIRE LABELS**

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State count of names supplied.
- Please omit names previously used on:

SHIP BY: 09/26/83

MUST BE RECEIVED BY: 09/28/83

FOR MAILING ON: 10/10/83

SHIP VIA: UPS

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only — Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

SHIP TO ONE DIRECT MAIL SERVICES
117 INDUSTRIAL BLVD.
KEARNEYSVILLE, WV 25430

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

QUANTITY	LIST	KEY	PER M
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5000 BUILT CONSERVATIVE ECLORS

PLEASE KEY EACH LABEL WITH "RL69". PLEASE OBTAIN LABELS ON ORDER #306-103.

SALT INITIALS:

FOR ALL QUESTIONS ON THIS ORDER CALL

Cynthia Taylor
1-800-424-1000

WORKING NAMES, INC.

4877 East West Highway
Baltimore, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 10/12/83

WN ORDER NO.: 310-021

BROKERS NUMBER: 505 57

MAILER: CONSERV AGAINST LIBERAL ^{OFFER} LEGISFR

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State count of names supplied.
- Please omit names previously used on:

FURNISH NAMES ON: =4-UP CHESHIRE LABELS

SHIP BY: 11/02/83

MUST BE RECEIVED BY: 11/04/83

FOR MAILING ON: 11/21/83

SHIP VIA: UPS

SHIP TO
DIVERSIFIED MAILING SERVICES
WALDORF INDUST PK, ACTON LANE
WALDORF, MD 20601

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

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QUANTITY	LIST	KEY	PER M
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5000 ONLY CONSERVATIVE DONORS

FE25

10.00

PLEASE KEY EACH LABEL WITH "FE25". **PLEASE OMIT NAMES USED ON ORDER #306-043**

SALT INITIALS:

Cynthia Taylor

WORKING NAMES, INC.

4427A West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 10/11/83 WN ORDER NO.: 310-011

BROKERS NUMBER: 570-07

MAILER: FUND F/A CONSERVATIVE MAJORITY OFFER: FR

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

- LIST
- Please address a representative cross section of the entire list.
 - Please address an "Nth" name selection of the entire list.
 - Please address as indicated below.
 - Using the enclosed form, please send WN a State count of names supplied.
 - Please omit names previously used on:

FURNISH NAMES ON: 4-UP CHESHIRE LABELS

SHIP BY: MUST BE RECEIVED BY: 10/20/83

FOR MAILING ON: 10/24/83

SHIP VIA: 11/21/83

UPS

SHIP TO: NAIL BAG
5005 JACKSON PLACE
HYATTSVILLE, MD 20781
ATTN: NICK SLAUGHTER

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

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QUANTITY	LIST	KEY	PER M
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10000 - FULLY CONSERVATIVE DONORS AS19A, AS19B 12:50

PLEASE SPLIT INTO 2 UNDUPLICATED GROUPS OF 5,000 EACH.
KEYCODE: 5,000 NTH NAME CODE AS19A
5,000 NTH NAME CODE AS19B
SALT INITIALS:

FOR ALL QUESTIONS ON THIS ORDER CALL

Amelia Taylor

WORKING NAMES, INC.

4427A Elm West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 10/20/83 WN ORDER NO.: 310-045

BROKERS NUMBER: 393-7

MAILER: COUNCIL P/INTER-AM SECURITY FR OFFER:

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

FURNISH NAMES ON: Magnetic Tape 9TK 1600 BPI
Supply Dump & Layout

- LIST
- Please address a representative cross section of the entire list.
 - Please address an "Nth" name selection of the entire list.
 - Please address as indicated below.
 - Using the enclosed form, please send WN a State count of names supplied.
 - Please omit names previously used on:

SHIP BY: 10/21/83
MUST BE RECEIVED BY: 10/24/83
FOR MAILING ON: 10/31/83
SHIP VIA: OVERNITE

SHIP TO THE VIGUERIE COMPANY
7777 LEESBURG PIKE
FALLS CHURCH, VA 22043
ATTN: RON BROOKS

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign . . . unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE . . . Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

QUANTITY LIST KEY PER M

5000 TRULY CONSERVATIVE DONORS

SALT INITIALS:

[Handwritten signature]

[Handwritten signature]

FEDERAL BUREAU OF INVESTIGATION

DATE

NAME

ADDRESS

38040675077

Thomas ~~4624367~~

WORKING NAMES, INC.

~~4427A East-West Highway~~
~~5916322 Maryland 20814~~

FULFILLMENT INSTRUCTION ORDER

DATE: 12/22/83

WN ORDER NO. 312-053

BROKERS NUMBER: 97

MAILER: JEFFERSON EDUCATIONAL FOUNDATION

HEYMAN CONSULTING GROUP
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

FURNISH NAMES ON: -4-UP CHESHIRE LABELS

SHIP BY: 01/04/84

MUST BE RECEIVED BY: 01/09/84

FOR MAILING ON: 01/16/84

SHIP VIA: UPS

SHIP TO DIRECT MAILING MARKETING INC.
CALVERT COUNTY INDUSTRIAL PARK
PRINCE FREDERICK, MD 20678
ATTN: BOB SALTA

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State count of names supplied.
- Please omit names previously used on:

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

QUANTITY LIST KEY PER M

5000 DAILY CONSERVATIVE DONORS J4 10.50

PLEASE OMIT NAMES FROM SCFS 500-528
PLEASE KEY EACH LABEL WITH "J4".
SALT INITIALS:

FOR ALL QUESTIONS ON THIS ORDER CALL

Cynthia Taylor

WORKING NAMES, INC.

4461A East West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 12/19/83 WN ORDER NO312-042

BROKERS NUMBER: 1

MAILER: COLONIAL WILLIAMSBURG OFFERER

HEYMAN CONSULTING GROUP
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State court of names supplied.
- Please omit names previously used on:

FURNISH NAMES ON: Magnetic Tape-9TK 1600 BPI
Supply Dump & Layout

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. . . . Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

SHIP BY: 01/02/84

MUST BE RECEIVED BY: 01/04/84

FOR MAILING ON: 02/06/84

SHIP VIA: UPS BLUE

SHIP TO: WILAND & ASSOC.
1101 INTERNATL PKWY, POB 5445
FREDERICKSBURG, VA 22401
ATT: HELEN SHEEHAN

QUANTITY LIST KEY PER M

5000 TRULY CONSERVATIVE DONORS

12.50

SALT INITIALS:

FOR ALL QUESTIONS ON THIS ORDER CALL

Amelia Taylor
(301) 992-2102

WORKING NAMES, INC.

4421A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 09/17/84

WN ORDER NO.: 409-205

BROKERS NUMBER: 0875-77

MAILER: BOB HOPE INSTITUTE

OFFER: FR

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

FURNISH
NAMES ON:

Magnetic Tape 9TK 1600 BPI
Supply Dump & Layout

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State court of names supplied.
- Please omit names previously used on:

SHIP BY: 09/25/84

MUST BE RECEIVED BY: 09/27/84

FOR MAILING ON: 10/29/84

SHIP VIA: OVERNIGHT

SHIP TO THE REGENCY GROUP
80 S. LAKE AVENUE, SUITE 600
PASADENA, CA 91101
ATTN: DIANE LOSIE

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only — Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign . . . unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE . . . Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

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QUANTITY LIST KEY PER M

10000 FULLY CONSERVATIVE DONORS

12.50

PLEASE MARK SHIPPING LABEL "BHF3728" AND TAPE WITH DATE LIST.
SALT INITIALS

FOR ALL QUESTIONS ON THIS ORDER CALL

[Handwritten Signature]
(301) 658-5103

WORKING NAMES, INC.

4421A East-West Highway -
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 08/17/84

WN ORDER NO.: 408-211

BROKERS NUMBER 03

MAILER: MORAL MAJORITY

OFFER: FR

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

FURNISH NAMES ON: =4-UP CHESHIRE LABELS

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State count of names supplied.
- Please omit names previously used on:

SHIP BY: 08/24/84

MUST BE RECEIVED BY: 08/29/84

FOR MAILING ON: 09/03/84

SHIP VIA: UPS BLUE

SHIP TO
OLD-TIME GOSPEL HOUR
2220 LANGHORNE ROAD
LYNCHBURG, VA 24515
ATTN:ODELL JARVIS

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

QUANTITY LIST KEY PER M

10000 POLY CONSERVATIVE DONORS

PLEASE KEY EACH AND EVERY LABEL "Y486D".
SALT INITIALS

FOR ALL QUESTIONS

[Handwritten Signature]
1-800-8103

4421A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 09/19/84 WN ORDER NO.: 409-208
MAILER: USO OFFER: FR

BROKERS NUMBER: 13355-01

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEWAN CONSULTING GROUP
1705 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEWAN

FURNISH NAMES ON: Magnetic Taps 9TK 1600 BPI
Supply Disp & Layout

- LIST
- Please address a representative cross section of the entire list.
 - Please address an "NB" name selection of the entire list.
 - Please address as indicated below.
 - Using the enclosed form, please send WN a State count of names supplied.
 - Please print names previously used on...

SHIP BY: 09/27/84
MUST BE RECEIVED BY: 10/01/84
FOR MAILING ON: 11/26/84
SHIP VIA: UPS BLUE

SHIP TO: SATURN CORPORATION
4701 LYDELL ROAD
CHEVERLY, MD 20781
ATTN: JANE BARRELL

KEEP A RECORD OF NAMES SUPPLIED, TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only — Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign . . . unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. . . . Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

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QUANTITY LIST KEY PER M

ALL AVAILABLE

82000 TRULY CONSERVATIVE DONORS X29 12.50

PLEASE KEY SHIPPING LABEL "X29" ONLY. PLEASE OMIT SCF'S ON ATTACHED SHEET.
SALT INITIALS

WORKING NAMES, INC.

4481A East West Highway
Baltimore, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 01/20/84 W.N. ORDER NO.: 401-065

BROKERS NUMBER: 9088 1

MAILER: AM FND F/T BLIND OFFER: FR

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

- LIST
- Please address a representative cross section of the entire list.
 - Please address an "Nth" name selection of the entire list.
 - Please address as indicated below.
 - Using the enclosed form, please send WN a State court of names supplied.
 - Please omit names previously used on:

FURNISH NAMES ON: Magnetic Tape 9TR 1600 BPI
Supply Dump & Layout

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only — Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign . . . unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE . . . Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

SHIP BY: 02/03/84

MUST BE RECEIVED BY: 02/06/84

FOR MAILING ON: 03/05/84

SHIP VIA: UPS BLUE

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

SHIP TO: WILAND & ASSOC., INC.
1101 IVERNIL PKWY, POB 5445
FREDERICKSBURG, VA 22401
ATTN: JOANNE DIEHL

JOB# 50474

QUANTITY LIST KEY PER M

10000 TRULY CONSERVATIVE DONORS 5354 12.50

PLEASE OMIT NAMES USED ON ORDER #308-054 & #302-056
PLEASE KEY SHIPPING LABEL ONLY.
SALT INITIALS:

FOR ALL QUESTIONS ON THIS ORDER CALL

Cynthia Taylor
804-552-5303

WORKING NAMES, INC.

4427A EISENHOWER Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 01/04/84

WN ORDER NO.: 401-006

BROKERS NUMBER: 1225-57

MAILER: NRSC

OFFER: FR

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

PUBLISH NAMES ON: Magnetic Tape 9TK 1600 BPI
Supply Dump & Layout

SHIP BY: 01/18/84

MUST BE RECEIVED BY: 01/20/84

FOR MAILING ON: 02/06/84

SHIP VIA: UPS

SHIP TO
WILAND & ASSOCIATES
1101 INTERNATIONAL PARKWAY
FREDERICKSBURG, VA 22041
ATTN: GEORGE HIYAMA

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State count of names supplied.
- Please omit names previously used on:

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign . . . unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE . . . Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

QUANTITY LIST KEY PER M

77000 TRULY CONSERVATIVE DONORS 12.50

PLEASE OMIT NAMES USED ON ORDER #308-103
SALT INITIALS:

FOR ALL QUESTIONS ON THIS ORDER CALL

Angela Taylor
(301) 251-5143

WORKING NAMES, INC.

4421A East West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 01/09/83

WN ORDER NO.: 401-019

BROKERS NUMBER: 28088-54

MAILER: PEOPLE'S MEDICAL SOCIETY OFFER: MEMBERSHIP

HEYMAN CONSULTING GROUP
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State count of names supplied.
- Please omit names previously used on:

FURNISH NAMES ON: Magnetic Tape 9TK 1600 BPI
Supply, Dump & Layout

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only — Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

SHIP BY: 01/19/84

MUST BE RECEIVED BY: 01/23/84

FOR MAILING ON: 02/20/84

SHIP VIA: ~~UPS BLUE~~ AIR FREIGHT

SHIP TO: TRIPLEX DIRECT MARKETING
3135 KERNER BLVD
SAN RAFAEL, CA 94901
ATTN: SHEILA MARTIN

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

QUANTITY	LIST	KEY	PER M
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5000 TRULY CONSERVATIVE DONORS

12.50

SALT INITIALS:

FOR ALL

WORKING NAMES, INC.

4421A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 03/08/84

WN ORDER NO.: 403-019

BROKERS NUMBER: 5

MAILER: ENC

OFFER: FR

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP
1706 LOFRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

FURNISH NAMES ON:

Magnetic Tape 9TK 1600 BPT
Supply Dump & Layout

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN-a-State count of names supplied.
- Please omit names previously used on:

SHIP BY:

03/22/84

MUST BE RECEIVED BY:

03/26/84

FOR MAILING ON:

04/09/84

SHIP VIA:

UPS

SHIP TO

PREFERRED LISTS, INC.
499 SC. CAPITOL ST., SW, #104
WASHINGTON, D.C. 20003
ATTN: ELLEN KRONMAN

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

QUANTITY

LIST

KEY

PER M

1000 GREEN CONSERVATION DONORS

LIST NUMBER:

FOR ALL QUESTIONS ON THIS ORDER CALL

Angela Taylor

(301) 986-0103

WORKING NAMES, INC.

4431A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 03/06/84 WN ORDER NO.: 403-011

BROKERS NUMBER: 10-47

MAILER: DEAFNESS RESEARCH FOUNDATION FR

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State court of names supplied.
- Please omit names previously used on:

FURNISH NAMES ON: Magnetic Tape 9TK 1600 BPI
Supply Dump & Layout

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

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SHIP BY: 03/09/84
MUST BE RECEIVED BY: 03/12/84
FOR MAILING ON: 04/30/84
SHIP VIA: UPS

SHIP TO: WILAND & ASSOCIATES INC.
1101 INTERNATL PKWY, POB 5445
FREDERICKSBURG, VA 22401
JOB #50903

QUANTITY	LIST	KEY	PER M
5000	TRULY CONSERVATIVE LCIOPS		

CALT INITIALS:

Thank! *Alexia Taylor*
(301) 650-6100

FOR ALL QUESTIONS ON THIS ORDER CALL

WORKING NAMES, INC.

4421A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 01/20/84 WN ORDER NO.: 401-055
MAILER: NRSC OFFER: FR

BROKERS NUMBER:

HEXMAN CONSULTING GROUP
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEXMAN

FURNISH NAMES ON: Magnetic Tape 9TK 1600 DPI
Supply Dump & Layout

SHIP BY: 02/03/84

MUST BE RECEIVED BY: 02/06/84

FOR MAILING ON: 02/27/84

SHIP VIA: UPS

SHIP TO: PREFERRED LISTS, INC.
499 S. CAPITOL ST, SW, #104
WASHINGTON, D.C. 20003
CATHERINE GUERARD

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State count of names supplied.
- Please omit names previously used on:

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

QUANTITY LIST KEY PER M

10000 FULLY CONSERVATIVE DONORS 6425 10.50

PLEASE USE SHIPPING LABEL ONLY.
SALT INITIALS:

FOR ALL QUESTIONS ON THIS ORDER CALL

Cynthia Yankin
(301) 688-4105

WORKING NAMES, INC.
4421A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 06/25/84 WN ORDER NO.: 406-040

BROKERS NUMBER: 11753-1

MAILER: MEMORIAL SLOW LETTERING OFFER: FR

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEMAN CONSULTING GROUP
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEMAN

- LIST
- Please address a representative cross section of the entire list.
 - Please address an "Nth" name selection of the entire list.
 - Please address as indicated below.
 - Using the enclosed form, please send WN a State count of names supplied.
 - Please omit names previously used on:

FURNISH NAMES ON: Magnetic Tapes 9TK 1600 EPT
Supply Dump & Layout

SHIP BY: 07/05/84

MUST BE RECEIVED BY: 07/09/84

FOR MAILING ON: 09/10/84

SHIP VIA: UPS BLUE

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

SHIP TO
WILAND & ASSOCIATES
1101 INTERNATIONAL PKWY, ROB 5445
FREDERICKSBURG, VA 22401
ATTN: DON HILL

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

QUANTITY LIST KEY PER M

25000 TRULY CONSERVATIVE DONORS

PLEASE OMIT NAMES ON ORDER 311-026. **PLEASE OMIT 3015-300 THRU 918.** SALT INITIALS:

FOR ALL QUESTIONS CALL (301) 656-5203
Donna Taylor

WORKING NAMES, INC.
4421A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 06/28/84 WN ORDER NO.: 406-043

BROKERS NUMBER: 1

MAILER: COLONIAL WILLIAMSBURG OFFER, INC.

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

SHIP TO: Magnetic Tape, STX 1600 BPT
Supply Dump & Layout

- LIST
- Please address a representative cross section of the entire list.
 - Please address an "Nth" name selection of the entire list.
 - Please address as indicated below.
 - Using this list, please send WN a State count of names supplied.
 - Please omit names previously used on:

SHIP BY: 07/05/84

MUST BE RECEIVED BY: 07/09/84

FOR MAILING ON: 09/17/84

SHIP VIA: UPS BLUE

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only — Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign, unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

SHIP TO: WILAND & ASSOCIATES, INC.
1101 INTERNATIONAL PKWY, BOX 5445
FREDERICKSBURG, VA 22401
ATTN: HELEN SHEEHAN

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

QUANTITY	LIST	KEY	PER M
5000	LEFT CONSERVATIVE DONORS		12.50

PLEASE OMIT NAMES USED ON #312-042, IF POSSIBLE.

SALT INITIALS:

Taylor

WORKING NAMES, INC.

4421A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 09/25/84

WN ORDER NO.: 409-211

BROKERS NUMBER: 5513-25

MAILER: FATHER FLANEGAN'S BOYS TOWN FR
OFFER:

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

FURNISH NAMES ON: Magnetic Tape 9TK 1600 BPI
Supply Dump & Layout

- LIST
- Please address a representative cross section of the entire list.
 - Please address an "Nth" name selection of the entire list.
 - Please address as indicated below.
 - Using the enclosed form, please send WN a State count of names supplied.
 - Please omit names previously used on:

SHIP BY: 10/03/84

MUST BE RECEIVED BY: 10/05/84

FOR MAILING ON: 01/07/85

SHIP VIA: UPS

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

SHIP TO: FATHER FLANAGANS C/O ALREY CO
SYSTEM DUPLI MATCH DIV
41 KIMLER DRIVE
HAZELWOOD, MD 63043

QUANTITY	LIST	KEY	PER M
25000	FULL CONSERVATIVE DONORS		

FOR ALL QUESTIONS ON THIS ORDER CALL

Joseph P. Kelly
(301) 656-1133

WORKING NAMES, INC.

4421A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 07/25/83 WN ORDER NO.: 307-051

BROKERS NUMBER: 57

MAILER: COVENANT HOUSE

OFFER: FR

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State count of names supplied.
- Please omit names previously used on

FURNISH NAMES ON: Magnetic Tape 9TK 1600 BPI
Supply Dump & Layout

SHIP BY: 08/08/83

MUST BE RECEIVED BY: 08/10/83

FOR MAILING ON: 10/10/83

SHIP VIA: UPS BLUE

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

SHIP TO: METRO MAIL
11 EISENHOWER LANE SOUTH
LOMBARD, ILLINOIS 60148
ATTN: PAT ECKSTROM

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

QUANTITY LIST KEY PER M

25000 FULLY CONSERVATIVE DONORS

PLEASE USE SHIPPING LABEL ONLY.

SALT INITIALS:

FOR ALL QUESTIONS ON THIS ORDER CALL

(301) 656-5103

WORKING NAMES, INC.
4421A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 07/18/83 WN ORDER NO307-025

BROKERS NUMBER: 377

MAILER: USO OFFERFR

HEYMAN CONSULTING GROUP
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State count of names supplied.
- Please omit names previously used on:

FURNISH NAMES ON: Magnetic Tape 9TK 1600 BPI
Supply Data & Layout

SHIP BY: 08/08/83

MUST BE RECEIVED BY: 08/10/83

FOR MAILING ON: 09/05/83

SHIP VIA: UPS

SHIP TO: SATURN CORP
4701 LYDELL RD
CHEVERLY, MD 20781
FIELDING YOST

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only — Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

In accepting this order, it is acknowledged that WN is an agent of the maker/broker/owner and is not liable for uncollected accounts.

QUANTITY	LIST	KEY	PER M
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45000 FULLY CONSERVATIVE DONORS

PLEASE OMIT PREVIOUS ORDER 212-031.
PLEASE OMIT SCFS ON ATTACHED SHEET.
PLEASE MARK TAPE REEL LABEL W/"977"
CALT INITIALS:

WORLDWIDE MAILING, INC.
4421A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 02/24/83 ORDER NO.: 302-045

BROKERS NUMBER:

MAILER: MORAL MAJORS OFFER: ER

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

LIST

- Please address a representative cross section of the entire list.
- Please address an "NN" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State count of names supplied.
- Please omit names previously used on:

4-UP Cheshire Labels

02/28/83

03/02/83

03/06/83

UPS

HUNTSINGER & JEFFER
809 BROOKHILL CIRCLE
RICHMOND, VA 23227
ATTN: PAUL

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign, unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

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QUANTITY	LIST	KEY	PER M
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5000	TRULY CONSERVATIVE DONORS	Y488A	12.50
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PLEASE OMIT PREVIOUS ORDER 301-014
THIS IS A CONFIRMATION OF A PHONE-IN ORDER BY HARRIS,
PLEASE DON'T DUPLICATE.
PLEASE KEY LABELS "Y488A"

WORKING NAMES, INC.

4421A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 2/18/83

WN ORDER NO: 302-027

BROKERS NUMBER: 94

MAILER: FAMILY ASSOC

OFFER:

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP, INC.
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State count of names supplied.
- Please omit names previously used on:

FURNISH NAMES ON: 4-UP Cheshire Labels

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only — Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign . . . unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE . . . Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

SHIP BY: 02/23/83

MUST BE RECEIVED BY: 02/24/83

FOR MAILING ON: 02/28/83

SHIP VIA: UPS

SHIP TO
DIRECT MAIL MANAGEMENT
RT 2-CALVERT INDUSTRIAL PARK
PRINCE FREDERICK, MD 20768
DON BROWN

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

QUANTITY	LIST	KEY	PER M
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SCFS 200-205, 220-225, KEY LABELS "C33" 12.50

PLEASE OMIT SCFS 200-205, 220-225, KEY LABELS "C33"
SALT INITIALS:
MAILER CAN USE ASAP, HOWEVER, IF MORE TIME IS REQUIRED ORDER
CAN BE SHIPPED 2/24 REGULAR UPS. THANKS.

WORKING NAMES, INC.

4421A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 10/25/84 WN ORDER NO.: 410-206

BROKERS NUMBER: 01

MAILER: COVENANT HOUSE OFFER: FR

HEIMAN CONSULTING GROUP
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEIMAN

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State count of names supplied.
- Please omit names previously used on:

FURNISH Magnetic Tape 9TK 1600 BPI
NAMES ON: Supply-Dump & Layout

SHIP BY: 11/01/84

MUST BE RECEIVED BY: 11/05/84

FOR MAILING ON: 01/14/85

SHIP VIA: URS BLUE

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign . . . unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE . . . Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

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SHIP TO
METRO MAIL
11 EISENHOWER LAWE SOUTH
LOMBARD, IL 60148
ATTN: TAPE LIBRARIAN

QUANTITY LIST KEY PER M

20000 FULL CONSERVATIVE DUCKS

12.00

***PLEASE KEY SHIPPING LABEL "AHEB" CALL ***
SALT INITIALS

FOR ALL QUESTIONS ON THIS ORDER CALL

Jay A. Gahan
800 836-0103

WORKING NAMES, INC.
 4421A East-West Highway
 Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 1/27/83

WN ORDER NO 01-046

BROKERS NUMBER 668 - 5

MAILER NRIW-LDF

OFFER FUNDRAISING

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP, INC.
 1706 LORRE DRIVE
 ROCKVILLE, MD 20852
 ATTN: VICTOR HEYMAN

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State count of names supplied.
- Please omit names previously used on:

FURNISH NAMES ON: Magnetic Tape 9TK 1600 BPI
 Supply Dump & Layout

SHIP BY: 02/10/83

MUST BE RECEIVED BY: 02/14/83

FOR MAILING ON: 03/21/83

SHIP VIA: UPS

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only — Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign . . . unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE . . . Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

SHIP TO NRIW-LDF
 8001 BRADDOCK RD, SUITE 600
 SPRINGFIELD, VA 22160
 SUSAN WAGNER

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

QUANTITY	LIST	KEY	PER M
5000	TRULY CONSERVATIVE DONORS	CACT	12.00

PLEASE USE ONLY RECENTLY ADDED NAMES AS DISCUSSED WITH US. THIS ORDER WILL BE USED DURING A 2 WEEK PERIOD IN WHICH ALL OF THE TRULY FILE (35/M) IS IN USE. THE INITIAL 21/2 NAMES ARE ALREADY IN USE FOR THIS PERIOD. MARK "CACT" ON LABEL.

FOR ALL QUESTIONS ON THIS ORDER CALL

(301) 656-5103

WORKING NAMES, INC.

4421A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 02/08/83

WN ORDER NO.: 302-018

BROKERS NUMBER: 2047 - 2

MAILER: NATL LEAGUE POW-MIA FAMILIES OFFER: FR

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP, INC.
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

FURNISH NAMES ON: 4-UP Cheshire Labels

- LIST
- Please address a representative cross section of the entire list.
 - Please address an "Nth" name selection of the entire list.
 - Please address as indicated below.
 - Using the enclosed form, please send WN a State count of names supplied.
 - Please omit names previously used on:

SHIP BY: 02/28/83

MUST BE RECEIVED BY: 03/07/83

FOR MAILING ON: 03/21/83

SHIP VIA: UPS

SHIP TO VALLEY MAILING SERVICE
101 VALLEY DRIVE
ALLENSVILLE, PA 17002

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

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QUANTITY	LIST	KEY	PER M
5000	TRULY CONSERVATIVE DONORS	W539	12.00

PLEASE OMIT CTS 206-219, 270-289, 900-912
PLEASE KEY LABELS "W539"

FOR ALL QUESTIONS ON THIS ORDER CALL

(301)-958-5103

WORKING NAMES, INC.

4421A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 02/08/83

WN ORDER NO.: 302-019

BROKERS NUMBER: 2065 - 1

MAILER: BLINDED VETERANS ASSOC

OFFER: FR

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP, INC.
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

FURNISH NAMES ON: 4-UP Cheshire Labels

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State count of names supplied.
- Please omit names previously used on:

SHIP BY: 02/16/83

MUST BE RECEIVED BY: 02/21/83

FOR MAILING ON: 03/28/83

SHIP VIA: UPS

SHIP TO: VALLEY MAILING SERVICE
101 VALLEY DRIVE
ALLENSVILLE, PA 17002

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only — Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

QUANTITY

LIST

KEY

PER M

5000 TRULY CONSERVATIVE DONORS

K243

12.50

PLEASE OMIT STATES OF PA, VA, AND SCPS 900-918
PLEASE KEY LABELS "K243"

WORKING NAMES, INC.

4421A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE 3/17/83

WN ORDER 803-026

BROKERS NUMBER 8298J - 1

MAILER: MEM SLOAN KETTERING CANCER CIR OFFER: FR

HEYMAN CONSULTING GROUP, INC.
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

FURNISH NAMES ON: Magnetic Tape 9TR-1600-BPI
Supply Dump & Layout

SHIP BY: 03/28/83

MUST BE RECEIVED BY: 03/30/83

FOR MAILING ON: 05/16/83

SHIP VIA: UPS

SHIP TO WILAND & ASSOC., INC.
1101 INVNL. PKWY., PO BOX 5445
FREDERICKSBURG, VA 22401

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State count of names supplied.
- Please omit names previously used on:

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

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QUANTITY	LIST	KEY	PER M
5000	TRULY CONSERVATIVE DONORS		12.50

UNIT SCFS 900 THRU 918
SALT INITIALS:

FOR ALL QUESTIONS ON THIS ORDER CALL

(301) 252-5100

WORLDWIDE BOOKS, INC.
487A East West Highway
Bethesda, Maryland 20814

FULLFILLMENT INSTRUCTION ORDER

DATE: 02/27/84 WN ORDER NO.: 402-079

BROKERS NUMBER: 10043-1

MAILER: DIABETES TRUST FUND OFFER: FR

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULLFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

- LIST
- Please address a representative cross section of the entire list.
 - Please address an "Nth" name selection of the entire list.
 - Please address as indicated below.
 - Using the enclosed form, please send WN a State count of names supplied.
 - Please omit names previously used on:

FURNISH NAMES ON: Magnetic Tape 9TK 1600 BPI
Supply Dump & Layout

SHIP BY: 03/01/84

MUST BE RECEIVED BY: 03/05/84

FOR MAILING ON: 04/09/84

SHIP VIA: UPS BLUE

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only — Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

SHIP TO: DIABETES TRUST FUND
1808-7TH AVE. SO., ROOM 433
BIRMINGHAM, AL 35294
ATT: HERMINIA COFFEE

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

0
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3
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5
1
0

QUANTITY LIST KEY PER M

10000 TULLY CONSERVATIVE DONORS AP9 12.50

**PLEASE OMIT NAMES USED ON #309-004. **PLEASE ALSO OMIT NAMES IN SCFS 900-918; 941. **KEY EACH LABEL WITH "AP9". ** SALT INITIALS:

SHIPPING LABEL ONLY

Mark *Annita Taylor*

FOR ALL QUESTIONS ON THIS ORDER CALL

(301) 600-0100

COMPUTER COMMUNICATIONS, INC.
 2091A Eastland Highway
 Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 02/14/84

WN ORDER NO.: 402-044

BROKERS NUMBER: 007420-4

MAILER: NRSC

OFFER: FR

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP
 1706 LORRE DRIVE
 ROCKVILLE, MD 20852
 ATTN: VICTOR HEYMAN

- LIST
- Please address a representative cross section of the entire list.
 - Please address an "Nth" name selection of the entire list.
 - Please address as indicated below.
 - Using the enclosed form, please send WN a State count of names supplied.
 - Please omit names previously used on:

FURNISH NAMES ON: Magnetic Tape 9TK 1600 BRT
 Supply Dump & Layout

SHIP BY: 02/21/84

MUST BE RECEIVED BY: 02/23/84

FOR MAILING ON: 03/19/84

SHIP VIA: UPS/DELIVERY (BEST METHOD TO MEET DUE DATE)

SHIP TO: COMPUTER COMMUNICATIONS INC.
 8330 OLD COURTHOUSE RD., #120
 VIENNA, VA 22180
 ATTN: NORA DAVIS

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

QUANTITY	LIST	KEY	PER M
58000	TRILE CONSERVATIVE DONORS	NRSC	12.00

PLEASE OMIT NAMES USED ON #309-024 *FROM BALANCE*
 SALT INITIALS:

FOR ALL QUESTIONS ON THIS ORDER CALL *Shirley Taylor*

WORKING NAMES, INC.

4481A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 02/08/84 WN ORDER NO.: 402-021

BROKERS NUMBER: 21

MAILER: AMERICAN BIBLE SOCIETY OFFER: APPEAL

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State count of names supplied.
- Please omit names previously used on:

FURNISH NAMES ON: Magnetic Tape 9TK 1600 BPI
Supply Dump & Layout

SHIP BY: 02/20/84

MUST BE RECEIVED BY: 02/22/84

FOR MAILING ON: 04/25/84

SHIP VIA: UPS BLUE

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

SHIP TO: MARKET DEVELOPMENT CORP
41 KINLER DRIVE
HAZELWOOD, MO 63043
J. ANSELMO JOB #2513

QUANTITY	LIST	KEY	PER M
5000	EVANG CONSERVATIVE DONORS		12.50 \$10.70

SEE THE LISTEN NAMES FROM THE FOLLOWING STATES: WV; NC; IN; IA; MN; SD; ID; MT; KS; NE. COMPLETE THE SHIPPING LABEL ONLY. SPECIAL ONE-TIME ONLY PRICE: \$8.00/100. SALT INITIALS:

FOR ALL QUESTIONS ON THIS ORDER CALL

Cynthia Taylor
(301) 680-5100

WORKING NAMES, INC.

4431A-EastWest Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 03/20/84

WN ORDER NO.: 403-045

BROKERS NUMBER: 007463-4

MAILER: YOUNG AMERICANS FOR FREEDOM, JR

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP
1705 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

- LIST
- Please address a representative cross section of the entire list.
 - Please address an "Nth" name selection of the entire list.
 - Please address as indicated below.
 - Using the enclosed form, please send WN a State court of names supplied.
 - Please omit names previously used on

FURNISH NAMES ON: 4-UP CHESHIRE LABELS

SHIP BY: 03/29/84

MUST BE RECEIVED BY: 04/02/84

FOR MAILING ON: 04/09/84

SHIP VIA: UPS

SHIP TO: OMNI DIRECT MAIL SERVICES
117 INDUSTRIAL BLVD
KEARNEYSVILLE, WV 25430

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name, and quantity to appear on all packages.

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QUANTITY LIST KEY PER M

5000 TRULY CONSERVATIVE DONORS RF69 20.00

**PLEASE OMIT SCFS: 200-209, 220-223. **PLEASE KEY EACH LABEL WITH "RF69". **SALT INITIALS:

Victor Heyman

WORKING NAMES, INC.

4421A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 03/15/84 WN ORDER NO.: 403-022 BROKERS NUMBER: H8542-65

MAILER: AMERICANS FOUNDATION FR

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a Stat count of names supplied.
- Please omit names previously used on

FURNISH NAMES ON: =4-UP CHESHIRE LABELS

SHIP BY: 03/20/84

MUST BE RECEIVED BY: 03/22/84

FOR MAILING ON: 03/31/84

SHIP VIA: UPS NEXT DAY

SHIP TO
WORLDWIDE DIRECT MKTG.
776 WEST LANCASTER AVENUE
WAYNE, PA 19087
ATTN: MIKE SMITH

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign... unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE... Maintain correct sequence of list when packing for shipment. PLEASE: NUMBER CARTONS ACCORDINGLY. Master name, order number, key, list name, and quantity to appear on a package.

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

QUANTITY	LIST	KEY	PER M
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5000 TRULY CONSERVATIVE DONORS 50

****PLEASE KEY EACH & EVERY LABEL WITH #60.****
SALT INITIALS:

FOR ALL QUESTIONS OR INFORMATION

WORKING NAMES, INC.
4421A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 03/22/84

WN ORDER NO.: 403-062

BROKERS NUMBER: 1108-93

MAILER: ST. LABRE

OFFER: FR

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

FORWARD
NAMES ON:

Magnetic Tape 9TK 1600 BPI
Supply Dump & Layout

SHIP BY: 04/04/84

MUST BE RECEIVED BY: 04/09/84

FOR MAILING ON: 06/25/84

SHIP VIA: UPS

SHIP TO
SATURN CORPORATION
4701 LYDELL ROAD
CHEVERLY, MD 20781
HEATHER MASCHLER

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State count of names supplied.
- Please omit names previously used on:

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QUANTITY

LIST

KEY

PER M

15000 - TRULY CONSERVATIVE DOGURS

**PLEASE GIVE 4 LINE ADDRESSES. **PLEASE ALSO GIVE PHONE NO. ON #301-014, IF POSSIBLE. ** SALT INITIALS:

FOR ALL QUESTIONS ON THIS ORDER CALL

Cynthia Taylor
1-800-650-9108

WORKING NAMES, INC.

4421A-EastWest Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 04/19/84 WN ORDER NO.: 404-040

BROKERS NUMBER: 1150 37 01

MAILER: DIABETES TRUST FUND OFFER: FR

HEYMAN CONSULTING GROUP
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

FURNISH: Magnetic Tape 99K 1500 SET
Supply Dump & Layout

SHIP BY: 05/02/84

MUST BE RECEIVED BY: 05/07/84

FOR MAILING ON: 06/25/84

SHIP VIA: UPS

SHIP TO: DIABETES TRUST FUND
1808 7TH AVENUE SO.
BIRMINGHAM, AL 35294
MS. HERMINIA COFFEE

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
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QUANTITY LIST KEY PER M

20000 RUGLY CONSERVATIVE DONORS J14 12.50

PLEASE OMIT NAMES USED ON 309-004PLEASE OMIT SGT'S COO
THRU 918 AND 941**PLEASE KEY SHIPPING LABEL ONLY**SAMP
INITIALS **

WORKING NAMES, INC.
4421A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 04/30/84 WN ORDER NO.: 404-065 BROKERS NUMBER: 2383-97
MAILER: NCFAC OFFER: FR

HEYMAN CONSULTING GROUP
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

- LIST
- Please address a representative cross section of the entire list.
 - Please address an "Nth" name selection of the entire list.
 - Please address as indicated below.
 - Using the enclosed form, please send WN a State count of names supplied.
 - Please omit names previously used on:

FURNISH NAMES ON:

~~UP CUSHION LABELS~~
Pressure Sensitive Labels

SHIP BY: 05/10/84
MUST BE RECEIVED BY: 05/14/84
FOR MAILING ON: 05/21/84
SHIP VIA: UPS GROUND

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only — Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign . . . unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE . . . Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

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SHIP TO

SHAWATT MAILING SERVICES
10200 BACON DRIVE
BELTSVILLE, MD 20785
DAVE SHAWATT

QUANTITY	LIST	KEY	PER M
3000	TULLY CONSERVATIVE DONORS	5911	12.50

PLEASE PROVIDE NAMES ON PRESSURE SENSITIVE LABELS PLEASE KEY EACH LABEL **SALT INITIALS **

WORKING NAMES, INC.
 4421A East-West Highway
 Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 04/30/84 WN ORDER NO 404-066

BROKERS NUMBER: 97

MAILER: NCPAC OFFERER

HEYMAN CONSULTING GROUP
 1705 LORRE DRIVE
 ROCKVILLE, MD 20852
 ATTN: VICTOR HEYMAN

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

- LIST
- Please address a representative cross section of the entire list.
 - Please address an "Nth" name selection of the entire list.
 - Please address as indicated below.
 - Using the enclosed form, please send WN a State count of names supplied.
 - Please omit names previously used on:

FURNISH NAMES ON: -4-UP CHESHIRE LABELS

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only — Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

SHIP BY: 05/10/84
 MUST BE RECEIVED BY: 05/14/84
 FOR MAILING ON: 05/21/84
 SHIP VIA: UPS GROUND

SHIP TO
 LEWIS ADVERTISING
 325 EAST BACON STREET
 BALTIMORE, MD 21202
 JAN MCDONOUGH

QUANTITY	LIST	KEY	PER M
----------	------	-----	-------

0000	TRULY CONSERVATIVE DONORS	5913	12.00
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PLEASE KEY EACH LABELSALT INITIALS **

WORKING NAMES, INC.

4421A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 04/30/84

WN ORDER NO.: 404-067

BROKERS NUMBER: 57

MAILER: MCPAC

OFFER: FR

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State count of names supplied.
- Please omit names previously used on:

FURNISH NAMES ON: =4-UP CHESHIRE LABELS

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only — Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE... Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

SHIP BY: 05/10/84

MUST BE RECEIVED BY: 05/14/84

FOR MAILING ON: 05/21/84

SHIP VIA: UPS GROUND

SHIP TO
LEWIS ADVERTISING
325 EAST BACON STREET
BALTIMORE, MD 21202
JIM MCDONOUGH

QUANTITY	LIST	KEY	PER M
3000	LIBERAL CONSERVATIVE DONORS	5012	12.00

PLEASE GET EACH LABELSALT IMPRES**

WORKING NAMES, INC.
 4421A East-West Highway
 Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 04/30/84 WN ORDER NO.: 404-068

BROKERS NUMBER: 3735 17

MAILER: BOB HOPE HEART INSTITUTE OFFER: FR

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP
 1706 LORRE DRIVE
 ROCKVILLE, MD 20852
 ATTN: VICTOR HEYMAN

FURNISH NAMES ON: Magnetic Tape 9TK 1600 BPI
 Supply Dump & Layout

SHIP BY: 05/08/84

MUST BE RECEIVED BY: 05/14/84

FOR MAILING ON: 05/28/84

SHIP VIA: OVERTITE

SHIP TO THE REGENCY GROUP
 80 S. LAKE AVE., STE# 600
 PASADENA, CA 91101
 DIANE LOSIE

- LIST
- Please address a representative cross section of the entire list.
 - Please address an "Nth" name selection of the entire list.
 - Please address as indicated below.
 - Using the enclosed form, please send WN a State count of names supplied.
 - Please omit names previously used on:

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only — Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

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QUANTITY LIST KEY PER M

25000 EARLY CONSERVATIVE DONORS

PLEASE PERFORM A/B/C/D/E/ SPLITPLEASE PROVIDE EARLY DONORS ON A SEPARATE TAPE WITH A QUANTITY OF 5000 EACH**PLEASE INITIALS **

FOR ALL QUESTIONS ON THIS ORDER CALL

(301) 688-6100

WORKING NAMES, INC.

4421A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 04/30/84

WN ORDER NO. 404-076

BROKERS NUMBER: 16

MAILER: AMERICAN TAX REDUCTION MOVIER

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

FURNISH NAMES ON: * Magnetic Tape 9TK 1600 BPI
Supply Dump & Layout

SHIP BY: 05/09/84

MUST BE RECEIVED BY: 05/14/84

FOR MAILING ON: 06/18/84

SHIP VIA: UPS BLUE LABEL

BUTCHER-FORDE CONSULTING
840 NEWPORT CENTER DR. STE#550
NEWPORT BEACH, CA 92660
CATHERINE YOST

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State count of names supplied.
- Please omit names previously used on:

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only — Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign . . . unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE . . . Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

QUANTITY	LIST	KEY	PER M
5000	BILLY CONSERVATIVE DONORS		11.00

PLEASE OMIT ALL CA NAMESSALT INITIALS **

WORKING NAMES, INC.

4421A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 06/04/84

WN ORDER NO.: 406-002

BROKERS NUMBER: 11402-1

MAILER: AM END F/T BLIND

OFFER: FR

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

FURNISH NAMES ON: Magnetic Tape 9TK 1600-BPI
Supply Dump & Layout

SHIP BY: 06/21/84

MUST BE RECEIVED BY: 06/25/84

FOR MAILING ON: 09/10/84

SHIP VIA: UPS BLUE

SHIP TO: WILAND AND ASSOCIATES
1101 INTERNATIONAL PKWY, BOX 5445
FREDERICKSBURG, VA 22401
ATTN: HELEN SHEEHAN

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State count of names supplied.
- Please omit names previously used on:

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

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QUANTITY	LIST	KEY	PER M
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10000 1981 CONSERVATIVE HONORS

PLEASE OMIT NAMES USED ON #401-065.
PLEASE KEY SHIPPING LABEL ONLY.

FOR ALL QUESTIONS ON THIS ORDER CALL

Cynthia Taylor
(301) 890-0100

WORKING NAMES, INC.

4421A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 07/25/84

WN ORDER NO.: 407-212

BROKERS NUMBER: 2652 97

MAILER: COALITION FOR FREEDOM OFFER: FR

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

FURNISH NAMES ON: Magnetic Tape 9TK 1600 BPI
Supply Dump & Layout

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State count of names supplied.
- Please omit names previously used on:

SHIP BY: 07/26/84

MUST BE RECEIVED BY: 07/30/84

FOR MAILING ON: 08/20/84

SHIP VIA: UPS NEXT DAY

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

SHIP TO: JEFFERSON MARKETING
3825 BARRETT DRIVE
RALEIGH, NC 27619
TO: PEGGY UNDERWOOD

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

QUANTITY	LIST	KEY	PER M
5000	PEOPLE CONSERVATIVE HONORS	4330	12.00

PLEASE KEY SHIPPING LABEL ONLY. CONFIRMATION OF ORDER-PLEASE DO NOT DUPLICATE!

Handwritten signature: Mark Cynthia Taylor

FOR ALL QUESTIONS ON THIS ORDER CALL

(301) 988-6108

WORKING NAMES, INC.

4421A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 07/23/84

WN ORDER NO.: 407-211

BROKERS NUMBER 97

MAILER: CITIZENS FOR AMERICA OFFER: FR

HEYMAN CONSULTING GROUP
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

FURNISH NAMES ON: Magnetic Tape 9TK 1500 BPI
Supply Dump & Layout

SHIP BY: 07/31/84

MUST BE RECEIVED BY: 08/06/84

FOR MAILING ON: 08/27/84

SHIP VIA: JES GROUND

SHIP TO: KUPF VOLKE, INC.
1755 BOSTON POST ROAD
MELROD, CT 06460
ATTN: KUPF VOLKE

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

LIST

- Please address a representative cross section of the entire list.
- Please address an "nth" name selection of the entire list.
- Please address as indicated below.
- If using the enclosed form, please send WN a State count of names supplied.
- Please omit names previously used on:

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. . . . Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

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QUANTITY

LIST

KEY

PER M

5000 LIBERAL CONSERVATIVE LEADERS

PLEASE USE SHIPPING LABEL ONLY.

INITIALS:

Thank!
Charles Taylor

FOR ALL QUESTIONS ON THIS ORDER CALL:

WORKING NAMES, INC.

4421A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 08/02/84

WN ORDER NO. 408-202

BROKERS NUMBER: V 72

MAILER: AMERICAN CHRISTIAN HERITAGE FID
OFFER FR

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State count of names supplied.
- Please omit names previously used on:

FURNISH NAMES ON:

Magnetic Tape 9TK 1600 BPI
Supply Dump & Layout

SHIP BY:

MUST BE RECEIVED BY: 08/10/84

FOR MAILING ON: 08/14/84

SHIP VIA: 08/27/84

UPS

SHIP TO

TIMES JOURNAL COMPANY
6883 COMMERCIAL DRIVE
SPRINGFIELD, VA 22159
ATTN: TARA BENSON

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only — Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is. Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

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QUANTITY

LIST

KEY

PER M

5000 R EADY CONSERVATIVE DONORS

NAAMES WILL BE USED FOR TELEMARKETING.

FOR ALL QUESTIONS ON THIS ORDER CALL

Mark C. Taylor
(301) 992-5109

WORKING NAMES, INC.

4421A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 08/05/84

WN ORDER NO.: 408-204

BROKERS NUMBER: 4872-35

MAILER: FATHER FLANAGAN'S BOYS TOWN FR
OFFER:

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

- LIST
- Please address a representative cross section of the entire list.
 - Please address an "Nth" name selection of the entire list.
 - Please address as indicated below.
 - Using the enclosed form, please send WN a State count of names supplied.
 - Please omit names previously used on:

FURNISH NAMES ON: Magnetic Tape 9TK 1600 BPT
Supply Dump & Layout

SHIP BY: 08/13/84

MUST BE RECEIVED BY: 08/17/84

FOR MAILING ON: 10/31/84

SHIP VIA: UPS

SHIP TO: FATHER FLANAGAN'S
41 KIMLER DRIVE
HAZELWOOD, MD 63043

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign . . . unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE . . . Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

QUANTITY LIST KEY PER M

50000 LUDY CONSERVATIVE DONORS

" 85% NET NAME \$7.50/M RUN CHARGES APPROVED PER NTC "
SALT INITIALS

FOR ALL QUESTIONS ON THIS ORDER CALL

[Signature]
201-222-5100

WORKING NAMES, INC.

4421A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 06/11/84

WN ORDER NO.: 406-006

BROKERS NUMBER: 1157-1

MAILER: USO

OFFER: FR

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

FURNISH NAMES ON: Magnetic Tape 9TK 1600 BPI
Supply Dump & Layout

SHIP BY: 06/19/84

MUST BE RECEIVED BY: 06/20/84

FOR MAILING ON: 07/23/84

SHIP VIA: UPS

SHIP TO: SAUVIN CORPORATION
4701 LYELL ROAD
CHEVERLY, MD 20781
ATTN: JANE BARREL

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State count of names supplied.
- Please omit names previously used on:

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only — Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

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QUANTITY	LIST	KEY	PER M
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10000 TRULY CONSERVATIVE DONORS

710

12.50

**PLEASE OMIT NAMES USED ON #312-003. PLEASE ALSO REFER TO Q1 ATTACHED SHEET. **KEY SHIPPING LABEL ONLY.
SALT INITIALS:

FOR ALL QUESTIONS ON THIS ORDER CALL

Keris Cynthia Taylor
(301) 984-6103

WORKING NAMES, INC.
 4421A East-West Highway
 Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 07/13/84 WBL ORDER NO.: 497-207 BROKERS NUMBER: 3 - 1

MAILER: MD ANDERSON CANCER RES GROUP FR

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP
 1706 LORRE DRIVE
 ROCKVILLE, MD 20852
 ATTN: VICTOR HEYMAN

- LIST
- Please address a representative cross section of the entire list.
 - Please address an "Nth" name selection of the entire list.
 - Please address as indicated below.
 - Using the enclosed form, please send WN a State count of names supplied.
 - Please omit names previously used on:

FURNISH NAMES ON: Magnetic Tape 9TK 1600 BPI
 Supply Dump & Layout

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign . . . unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE . . . Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

SHIP BY: 07/19/84
 MUST BE RECEIVED BY: 07/23/84
 FOR MAILING ON: 10/01/84
 SHIP VIA: UPS BLUE

SHIP TO: TABS
 10620 ROCKLEY RD, #500
 HOUSTON, TX 77099
 ATTN: ALICE THOMAS

QUANTITY	LIST	KEY	PER M
10000	TRULY CONSERVATIVE DONORS		12.50

PLEASE SELECT NAMES IN THE STATE OF TEXAS ONLY.
 SMT INITIALS:

Mark's [Signature]

WORKING NAMES, INC.
 4421A East-West Highway
 Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 07/02/84

WN ORDER NO: 407-202

BROKERS NUMBER: 10000

MAILER: ALLIANCE FOR SENIOR CITIZENS FR

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP
 1706 LORRE DRIVE
 ROCKVILLE, MD 20852
 ATTN: VICTOR HEYMAN

- LIST
- Please address a representative cross section of the entire list.
 - Please address an "Nth" name selection of the entire list.
 - Please address as indicated below.
 - Using the enclosed form, please send WN a State court of names supplied.
 - Please omit names previously used on:

FURNISH NAMES ON: Magnetic Tape 9TK 1600 BPI
 Supply Dump & Layout

SHIP BY: 5
 07/09/84

MUST BE RECEIVED BY: 6
 07/23/84

FOR MAILING ON: 08/06/84

SHIP VIA: DELIVER/ UPS - TO BE HAND DELIVERED TO
 CLCO BY M. COHEN ON 7/9/84

SHIP TO: WORKING NAMES INC.
 11600 BOILING BROOK PLACE
 ROCKVILLE, MD 20852

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. . . Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

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QUANTITY	LIST	KEY	PER M
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02002 NIXIES CONSERVATIVE DONORS

PLEASE PROVIDE ALL AVAILABLE NAMES. FOR LIST CLEANED BY ALLIANCE FOR SENIOR CITIZENS LEGISLATIVE FUNDING (ALCF). BE SURE TO PUT KEY LINE FOR EASIER CLEANING.

LIST WILL BE CLEANED BY MAILER WITH THE FOLLOWING UNDERSTANDING: MAILER TO PAY ALL COSTS FOR PACKAGE OUT. IF RESPONSE RATE OF 1.75% IS REACHED, MAILER WILL PAY FOR FIRST 5% NIXIES AND GUARANTEES RE-USE OF LIST AT FULL RENTAL PRICE. IN JANUARY. IF LESS THAN 1.5% RESPONSE IS RECEIVED, MAILER WILL PAY \$10/M.

FOR ALL ORDERS ON THIS ORDER CALL

Angela Taylor

WORKING NAMES, INC.
4421A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 08/13/84 WN ORDER NO.: 408-210
MAILER: NRSC OFFER: FR

BROKERS NUMBER: 7.65 04

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEIMAN CONSULTING GROUP
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEIMAN

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State court of names supplied.
- Please omit names previously used on:

FURNISH NAMES ON: Magnetic Tape 9TK 1600 BPI
Supply Dump & Layout

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only — Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign . . . unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE . . . Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

SHIP BY: 08/17/84
MUST BE RECEIVED BY: 08/21/84
FOR MAILING ON: 09/17/84
SHIP VIA: UPS OVERNIGHT
SHIP TO: COMPUTER COMMUNICATIONS
8330 OLD COURTHOUSE ROAD #120
VIENNA, VA 22180

QUANTITY LIST KEY PER M

82000 TRULY CONSERVATIVE DONORS

OS37

12.00

PLEASE KEY SHIPPING LABEL "OS37" ONLY. PLEASE SHIP TO SCF'S 200-225,*
SALT INITIALS

FOR ALL QUESTIONS ON THIS ORDER CALL

John A. [Signature]
800-421-5104

4427A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: August 30, 1984 WIRE ORDER NO: 408-220

BROKERS NUMBER: 2835-97

MAILER: Campaign For Prosperity OFFER: FR

Hayman Consulting Group
1706 Lorre Drive
Rockville, MD 20852
Attn: Victor Hayman

FURNISH NAMES ON: 4-Up Chesire Labels

SHIP BY: 09/13/84

MUST BE RECEIVED BY: 09/17/84

FOR MAILING ON: 10/01/84

SHIP VIA: UPS Ground

SHIP TO Washington Intelligence Bureau
2727 Merrilee Drive
Fairfax, VA 22031
Attn: John Neitzey

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

LIST

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- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
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- Please omit names previously used on:

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In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

QUANTITY	LIST	KEY	PER M
5,000	Truly Conservative Donors	78	

Please key each and every label "78" only.
Salt Initials

WORKING NAMES, INC.

4421A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 01/19/83

WN ORDER NO.: 301-034

BROKERS NUMBER: E1344 - 1

MAILER: PROJECT HOPE

OFFER: FUNDRAISING

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP, INC.
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State count of names supplied.
- Please omit names previously used on...

FURNISH NAMES ON: Magnetic Tape 9TK 1600 BPI
Supply Dump & Layout

SHIP BY: 01/27/83

MUST BE RECEIVED BY: 01/28/83

FOR MAILING ON: 03/21/83

SHIP VIA: UPS EXPRESS

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE... Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

SHIP TO: MARKETING ELECTRONICS CORP
11 EISENHOWER LANE SOUTH
LOMBARD, IL 60148
JOB #PH 619

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

QUANTITY	LIST	KEY	PER M
----------	------	-----	-------

5000	HELVY CONSERVATIVE DONORS	459	12.50
------	---------------------------	-----	-------

PLEASE OMIT SCFS 900 THRU 918
PLEASE USE UPS NEXT DAY AIR DELIVERY
PLEASE NOTE THAT MAILER CANNOT USE ORDERS REC'D LATER THAN 1/31/83.

WORKING NAMES, INC.

4421A East-West Highway
Bethesda, Maryland 20814

FULFILLMENT INSTRUCTION ORDER

DATE: 01/31/83

WN ORDER NO.: 301-050

BROKERS NUMBER: 13699 - 5

MAILER: RNC

OFFER: FUNDRAISING

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP, INC.
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

LIST

- Please address a representative cross section of the entire list.
- Please address an "Nth" name selection of the entire list.
- Please address as indicated below.
- Using the enclosed form, please send WN a State count of names supplied.
- Please omit names previously used on:

FURNISH NAMES ON:

Magnetic Tape 9TK 1600 BPI
Supply Dump & Layout

SHIP BY: 02/10/83

MUST BE RECEIVED BY: 02/14/83

FOR MAILING ON: 02/28/83

SHIP VIA: UPS

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE. Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

SHIP TO: PREFERRED LISTS, INC
499 S. CAPITOL ST, SW #504
WASHINGTON, DC 20003
ELLEN KRONMAN

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

QUANTITY	LIST	KEY	PER M
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5000	TRULY CONSERVATIVE DONORS		
------	---------------------------	--	--

12.50

WORKING NAMES, INC.

11600 Boiling Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



June 21, 1984

Victor Heyman
Tom Mays, Jr.
1706 Lorre Drive
Rockville, MD 20852

Dear Victor and Tom:

I had a very long working session with one of our bigger broker clients and went over every list usage on TRULY, NICE, SOLID, MATCHED MULTI, COMMITTED LIBERALS and CIVIL RIGHTS \$25+ lists.

The results of the usage are mixed ranging from very good to bad (if not horrible).

The future usage therefore was the thrust of our conversation.

In most respects the earlier names out perform the later names. We will therefore, for the first time, begin filling orders with the earlier names.

To get the later names to become more productive we suggest cleaning (ACR, not Data Bank) the whole list.

I can structure the following deal at these guessed-at costs:

Mailer to receive full runs of NICE, TRULY, SOLID. The 3 separate runs in zip sequence on mag tape. More specific instructions will be issued.

Mailer will absorb the costs of the first 2-3% of nixies.

Your partnership will pay the balance of the nixies.

Nixies cost \$.25 per envelope.

The partnership will bear the costs of key-punching and updating.

8 9 0 4 0 5 7 5 1 2 5

Victor Heyman
Tom Mays, Jr.
June 21, 1984
Page Two

Costs - based on 200,000 universe:

12-13% nixies rate = 26,000 pieces
we pay on 10% = 20,800 pieces
at \$.25/each = \$5,200.00

Keying 26,000 nixies and removing/updating
addresses @\$25/M 650.00
\$5,850.00

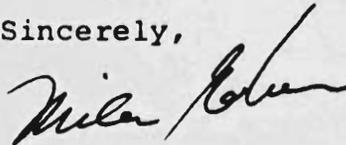
This breaks down to a guessed cost to each half of the
partnership of approximately \$2,925.00.

Tom, your half of the partnership owes Victor's approximately
\$3,750.00 for the keypunching costs from 150,000 to the current
level.

If you both approve, I will start putting the machinery in
motion. In order to get the deal we would have to move fast, so
that it can be done by 1985 testings.

Please let me know.

Sincerely,



Mike Cohen

88040675126

WORKING NAMES, INC.

11600 Boiling Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



September 10, 1984

John Whitehead
2006 Columbia Road, N.W.
Apt. #20
Washington, D.C. 20009

A/P - PAYMENT ADVICE

Check #4524
Amount: \$1,515.52

<u>LRO#</u>	<u>AMOUNT</u>
310-011	\$137.03
310-014	319.87*
310-020	64.10
310-021	64.45
310-045	63.75
310-064	64.61
310-065	62.96
310-066	64.80
310-068	63.75
311-002	65.83
311-003	64.81
311-005	130.81
311-006	63.05
311-014	56.98
311-015	63.75
311-028	107.60
311-029	57.37

TOTAL COMMISSION DUE..\$1,515.52

*Invoice #310-014-adjusted for net name billing.

8 9 0 4 0 6 7 5 1 2 7

WORKING NAMES, INC.

11600 Boiling Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



January 29, 1985

John Whitehead
2006 Columbia Road, N.W.
Apt. #20
Washington, D.C. 20009

A/P - PAYMENT ADVICE

Check #5006
Amount: \$2,115.30

88040675128

<u>LRO#</u>	<u>AMOUNT</u>
310-015	\$ 57.37
312-042✓	63.75✓
312-048✓	127.50✓
312-052✓	69.70✓
312-053✓	64.20✓
312-055✓	59.49✓
312-061✓	63.75✓
312-063✓	63.30✓
312-064✓	57.37✓
401-006✓	872.50✓
401-007	427.62✓
401-064✓	188.75✓
TOTAL COMMISSION DUE.....	\$2,115.30

WORKING NAMES, INC.

11600 Boiling Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



July 2, 1985

John Whitehead
2006 Columbia Road, N.W.
Apt #20
Washington, D.C. 20009

A/P - PAYMENT ADVICE

Check # *1068*
Amount: \$2,035.19

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<u>LRO#</u>	<u>AMOUNT</u>
403-080 ✓	\$ 63.75 ✓
404-033	127.50
405-012 ✓	292.50 ✓
405-021 ✓	255.00 ✓
405-030 ✓	482.96 ✓
406-013	127.50
406-038	127.50
406-043	63.75
407-208 ✓	57.36 ✓
408-203 ✓	312.50 ✓
408-206 ✓	67.91 ✓
412-208 ✓	56.96 ✓

TOTAL COMMISSION DUE.....\$2,035.19

WORKING NAMES, INC.

11600 Boiling Brook Place
Rockville, Maryland 20852

301/231-8001



June 6, 1985

John Whitehead
2006 Columbia Road, N.W.
Apt. #20
Washington, D.C. 20009

A/P - PAYMENT ADVICE

Check#5441
Amount: \$2,012.19

38040575130

<u>LRO#</u>	<u>AMOUNT</u>
403-006	\$ 63.75
403-076✓	63.75✓
403-078✓	63.75✓
403-079✓	63.75✓
403-085✓	531.38✓
404-005✓	63.75✓
404-006✓	127.50✓
404-007✓	127.50✓
404-035✓	59.93✓
404-051✓	63.75✓
404-053✓	63.75✓
404-057✓	44.63✓
404-063✓	37.50✓
404-068✓	318.75✓
404-069✓	318.75✓

TOTAL COMMISSION DUE.....\$2,012.19

WORKING NAMES, INC.

11600 Bolling Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



April 29, 1985

John Whitehead
2006 Columbia Road, N.W.
Apt. #20
Washington, D.C. 20009

A/P - PAYMENT ADVICE

Check #5305
Amount: \$2,008.31

9 8 0 4 0 5 7 5 1 3 1

<u>LRO#</u>	<u>AMOUNT</u>
401-025	\$ 63.75
401-089✓	62.50✓
402-038✓	64.35✓
402-048	63.75
402-063	63.75
402-066✓	103.21✓
402-073 ✓	64.87✓
402-079✓	316.75✓
402-084✓	64.47✓
402-085✓	64.36✓
402-097	63.75
402-098✓	63.75✓
403-008	63.11
403-010	66.05
403-011	63.75
403-014	63.75
403-043	63.75
403-054✓	63.75✓
403-061	191.25
403-062✓	191.25✓
403-066	63.75
403-072✓	54.89✓
403-081✓	63.75✓
TOTAL COMMISSION DUE.....\$2,008.31	

WORKING NAMES, INC.

11600 Boiling Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



March 28, 1985

John Whitehead
2006 Columbia Road, N.W.
Apt. #20
Washington, D.C. 20009

A/P - PAYMENT ADVICE

Check #5200
Amount: \$ 2,039.03

8 9 0 4 0 6 7 5 1 3 2

<u>LRO#</u>	<u>AMOUNT</u>
401-065✓	\$127.50✓
401-068	63.75
401-070✓	63.75✓
401-075✓	64.10✓
401-080✓	114.75✓
401-084✓	112.50✓
401-085✓	112.50✓
402-074✓	63.75✓
402-081	63.75
402-092	63.75
402-095	63.75
403-002	22.88
403-019	63.75
403-022✓	63.75✓
403-030✓	444.00✓
403-045✓	63.75✓
403-048✓	63.75✓
403-050✓	63.75✓
404-029✓	56.96✓
404-043✓	63.75✓
404-070✓	63.75✓
406-011	63.75
406-012	56.25
406-044	157.59
407-209✓	127.50✓
TOTAL COMMISSION DUE.....	<u>\$2,289.03</u>
LESS: LEGAL FEES FOR CASE WITH THE FEDERAL ELECTION COMMISSION.....	250.00
BALANCE DUE.....	<u>\$2,039.03</u>

WORKING NAMES, INC.

11600 Bolling Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



December 19, 1983

Tom Mays, Jr.
2006 Columbia Road, N.W.
Apt. #20
Washington, D.C. 20009

A/P - PAYMENT ADVICE

Check #3624
Amount: \$1,029.33
Payable To: Tom Mays, Jr.

83040675133

LIST RENTAL ORDER#

AMOUNT DUE

305-029 ✓	\$ 346.50
306-020 ✓	60.08
306-021 ✓	58.29
306-029 ✓	58.21
306-036 ✓	506.25

TOTAL DUE \$ 1,029.33

WORKING NAMES, INC.

11600 Bolling Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



November 29, 1983

Tom Mays, Jr.
2006 Columbia Road, N.W.
Apt. #20
Washington, D.C. 20009

Sample.

A/P - PAYMENT ADVICE

Check #3576
\$400.40
Payable to: Tom Mays, Jr.

8 8 0 4 0 5 7 5 1 3 4

<u>LIST RENTAL ORDER #</u>	<u>AMOUNT DUE</u>
302-004 ✓	\$ 26.18
303-013 ✓	14.75
303-015 ✓	47.63
304-024 ✓	150.38
304-030 ✓	32.15
305-009 ✓	112.50
305-013 ✓	12.88
305-018 ✓	13.49
305-021 ✓	7.22
305-024 ✓	18.51
306-004 ✓	63.09
306-008 ✓	64.31
307-059 ✓	18.26
310-028 ✓	76.53
310-061 ✓	90.97
311-035 ✓	76.89
TOTAL:	\$ 825.74

LESS: 1/3 Legal Fees Paid
to Kaswell, Perazich & Watson, P.C.
Check #3562

- 425.34
BALANCE DUE \$ 400.40

WORKING NAMES, INC.

11600 Bolling Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



November 30, 1984



John Whitehead
2006 Columbia Road, N.W.
Apt. #20
Washington, D.C. 20009

A/P - PAYMENT ADVICE

Check #4790
Amount: \$2,152.64

38040675135

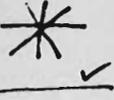
<u>LRO#</u>	<u>AMOUNT</u>
311-008 ✓	\$ 63.75
311-010 ✓	63.92
311-022 ✓	64.10
311-023 ✓	63.75
311-031 ✓	114.41
311-040 ✓	126.36
311-041 ✓	125.00
311-045 ✓	64.14
311-049 ✓	95.25
311-050 ✓	95.25
311-061 ✓	18.26
311-079 ✓	64.40
312-007 ✓	127.50
312-008 ✓	336.09
312-009 ✓	566.18
312-012 ✓	63.75
312-013 ✓	64.40
312-014 ✓	63.75
312-015 ✓	127.50
312-021 ✓	76.51
312-030 ✓	141.25
312-032 ✓	127.12
TOTAL.....	\$2,652.64
LESS: COMPUTER CHARGES	
PAID TO HEYMAN CONSULTING	
GROUP, CK#4773, 11/26/84	- 500.00
BALANCE DUE.....	\$2,152.64

WORKING NAMES, INC.

11600 Boiling Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



October 11, 1984

John Whitehead
2006 Columbia Road, N.W.
Apt. #20
Washington, D.C. 20009

A/P - PAYMENT ADVICE

Check #4616
Amount: \$2,034.40

<u>LRO#</u>	<u>AMOUNT</u>
311-020 ✓	\$402.75
311-025 ✓	377.62
311-026 ✓	315.00
311-037 ✓	<u>939.03*</u>
TOTAL COMMISSION DUE	\$2,034.40

*Invoice #311-037 adjusted for net name billing.

88040675136

WORKING NAMES, INC.

11600 Boiling Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



August 2, 1984

John Whitehead
2006 Columbia Road, N.W.
Apt. #20
Washington, D.C. 20009

A/P - PAYMENT ADVICE

Check #4417
Amount: \$2,037.67

88040575137

<u>LRO#</u>	<u>AMOUNT</u>
306-006 ✓	\$317.50
306-047 ✓	57.38
307-035 ✓	240.97
307-048 ✓	32.61
307-049 ✓	32.61
308-057 ✓	267.75
309-040 ✓	128.66
309-069 ✓	57.37
310-018 ✓	710.75
310-039	64.54
310-040 ✓	63.78
310-042 ✓	63.75

TOTAL COMMISSION DUE.....\$2,037.67

for Neil Burns

1. Copy 1979 tax return
2. loan org. fee rep. check

83040675138

WORKING NAMES, INC.

11600 Bolling Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



June 28, 1984



John Whitehead
2006 Columbia Road, N.W.
Apt. #20
Washington, D.C. 20009

A/P - PAYMENT ADVICE

Check #4281
Amount: \$2,047.84

380406/5139

<u>LRO#</u>	<u>AMOUNT</u>
308-016 ✓	\$ 57.37
308-108 ✓	64.06
308-109 ✓	62.50
308-113 ✓	63.61
308-124 ✓	127.50
309-001 ✓	544.73
309-004 ✓	63.75
309-009 ✓	63.92
309-017 ✓	443.11
309-021 ✓	63.87
309-031 ✓	126.58
309-038 ✓	531.37
309-041 ✓	64.43
309-042 ✓	64.41
309-043 ✓	131.25
309-049 ✓	58.60
309-070 ✓	63.75
310-002 ✓	131.25
310-004 ✓	63.78
TOTAL.....	\$2,789.84

LESS: LEGAL FEES.....- 242.00*
COMPUTER CHARGES...- 500.00**

BALANCE DUE.....\$2,047.84

*1/3 of payment sent to Kaswell, Perazich & Watson on 6/12/84
(see attached)

**Partial payment to Heyman Consulting Group for computer
services.

WORKING NAMES, INC.

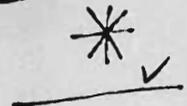
11600 Bolling Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



May 10, 1984



John Whitehead
2006 Columbia Road, N.W.
Apt. #20
Washington, D.C. 20009

A/P - PAYMENT ADVICE

Check #4109
Amount: \$2,804.16

83040575140

<u>LRO#</u>	<u>AMOUNT</u>
308-024 ✓	\$127.50
308-025 ✓	65.25
308-027 ✓	63.75
308-028 ✓	64.25
308-029 ✓	63.75
<u>308-030</u>	127.36
308-032 ✓	75.00
308-033 ✓	77.62
308-038 ✓	57.37
308-042 ✓	315.00
308-043 ✓	63.75
308-048 ✓	95.25
308-050 ✓	63.75
308-051 ✓	63.75
308-053 ✓	63.75
308-054 ✓	189.37
308-065 ✓	127.43
308-066 ✓	63.75
308-079 ✓	63.75
308-080 ✓	127.50
308-081 ✓	127.50
308-082 ✓	405.00
308-094 ✓	62.50
308-103 ✓	63.65
308-105 ✓	65.96
308-106 ✓	58.03
308-107 ✓	64.60
	<u>\$2,806.14</u>

LESS: Net Name Adjustment for
#307-025, paid 1/20/84,
check #3731 - 1.98
TOTAL COMMISSION DUE.....\$2,804.16

WORKING NAMES, INC.

11600 Bolling Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



April 3, 1984



John Whitehead
2006 Columbia Road, N.W.
Apt. #20
Washington, D.C. 20009

A/P - PAYMENT ADVICE

Check #3982
Amount: \$1,030.15

83040675141

<u>LRO#</u>	<u>AMOUNT</u>
307-042 ✓	\$ 63.75
307-043 ✓	57.37
307-050 ✓	61.96
307-055 ✓	63.75
307-058 ✓	63.75
307-063 ✓	63.75
308-001 ✓	57.37
308-005 ✓	129.66
308-006 ✓	135.77
309-026	59.34
309-028	17.57
307-030 ✓	63.75
307-046 ✓	63.75
308-018 ✓	64.86
308-019 ✓	63.75

TOTAL COMMISSION DUE \$1,030.15

WORKING NAMES, INC.

11600 Bolling Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



February 14, 1984

Thomas Mays, Jr.
2006 Columbia Road, N.W.
Apt. #20
Washington, D.C. 20009

A/P - PAYMENT ADVICE

Check #3815
Amount: \$998.17

R 8 0 4 0 6 7 5 1 4 2

<u>LIST RENTAL ORDER#</u>	<u>AMOUNT</u>
306-007✓	\$ 58.22
306-043✓	63.75
306-044✓	168.75
306-046✓	57.57
307-001✓	193.88
307-002✓	75.00
307-027✓	381.00
TOTAL PAYMENT DUE.....	\$ 998.17

WORKING NAMES, INC.

11600 Bolling Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



January 20, 1984

Tom Mays, Jr.
2006 Columbia Road, N.W.
Apt. #20
Washington, D.C. 20009

A/P - PAYMENT ADVICE

Check #3731
Amount: \$883.73

8 3 0 4 0 6 7 5 1 4 3

<u>LIST RENTAL ORDER#</u>	<u>AMOUNT</u>
307-025 ✓	\$ 574.50
307-051 ✓	<u>309.23</u>
TOTAL COMMISSION PAYMENT.....	\$ 883.73

WORKING NAMES, INC.

11600 Bolling Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



February 26, 1985

John Whitehead
2006 Columbia Road, N.W.
Apt. #20
Washington, D.C. 20009

A/P - PAYMENT ADVICE

Check #5105
Amount: \$2,039.49

88040575144

LRO#	AMOUNT
B-1272	\$ 50.62
402-013✓	76.50✓
402-017✓	63.75✓
402-019✓	63.85✓
402-021✓	51.00✓
402-022✓	63.75✓
402-024✓	126.00✓
402-027✓	77.29✓
402-031✓	63.75✓
402-033✓	64.12✓
402-044✓	734.43✓
402-045✓	541.10-
402-059✓	63.33✓

TOTAL COMMISSION DUE.....\$2,039.49

WORKING NAMES, INC.

11600 Bolling Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



November 1, 1984

John Whitehead
2006 Columbia Road, N.W.
Apt. #20
Washington, D.C. 20009

A/P - PAYMENT ADVICE

Check #4689
Amount: \$3,010.02

8 3 0 4 0 5 7 5 1 4 5

<u>LRO#</u>	<u>AMOUNT</u>
311-085	\$882.83*
312-002	430.31*
401-017	843.55
401-058	<u>853.33*</u>

TOTAL COMMISSION...\$3,010.02

*These invoices were adjusted for net name billing.

LAW OFFICES
SILVER, FREEDMAN & TAFF

(A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS)

1735 EYE STREET, N. W.

ELEVENTH FLOOR

WASHINGTON, D. C. 20006

(202) 429-6100

TELECOPIER (202) 833-3295

SIDNEY J. SILVER
ROBERT L. FREEDMAN
BARRY P. TAFF
JEAN ROSEN
HOWARD J. ROSS
DAVID B. MYATT
JAMES S. FLEISCHER
JEFFREY M. WERTHAN
LOIS G. JACOBS
KIP A. WEISSMAN •
EARL L. METHENY •
CHERYL R. FRANK •
STEPHEN J. O'CONNOR
DAVID M. KOSS
ILSA K. BUSH
DIANA M. SAVIT
LAWRENCE H. KIRSCH •
JOHN J. SPIDI
MARTIN L. MEYROWITZ
CATHERINE H. EIKLAND •

• NOT ADMITTED IN D.C.

FEC
GOC#9557
06 JAN 27 09:37
OF COUNSEL
ROBERT N. LEVIN
SUSAN BIRO

WRITER'S DIRECT DIAL NUMBER
(202) 429-

January 20, 1986

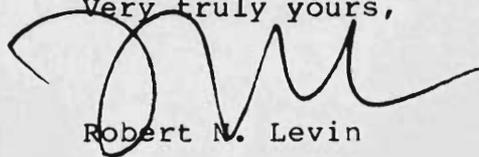
Jonathan Levin, Esq.
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: John L. Whitehead
MUR 1542

Dear Mr. Levin:

Please find enclosed Statement of Designation of Counsel.

Very truly yours,



Robert N. Levin

RNL:mf
Enclosure

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
06 JAN 27 P 2:34

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STATEMENT OF DESIGNATION OF COUNSEL

06 JAN 27 9:37

MUR 1542

NAME OF COUNSEL: Robert N. Levin, Esq.

ADDRESS: 1735 Eye Street, N.W., 11th Floor
Washington, D.C. 20006

TELEPHONE: (202) 429-6100

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.

January 18, 1986
Date


Signature John Whitehead

RESPONDENT'S NAME: John Whitehead

ADDRESS: 2006 Columbia Rd. NW #20
Washington DC 20009

HOME PHONE: (202) 234-7716

BUSINESS PHONE: (202) 298-9206

88040675147

ORIGINAL

J. Levin

CCC# 9664

36 FEB 6 11:28

1
COMMUNICATIONS SECTION

FEDERAL ELECTION COMMISSION

----- x

In Re:

JOHN WHITEHEAD &

MUR 1542

JOHN WHITEHEAD AND ASSOCIATES

----- x

Thursday, January 23, 1985

Washington, D.C.

Deposition of:

JOHN L. WHITEHEAD,

a witness, was called for examination by counsel for the plaintiff, pursuant to Notice and agreement of the parties as to time and place, beginning at approximately 10:05 a.m., in Room 651, the Federal Election Commission, 999 E Street, Northwest, Washington, D.C. 20463, before Patricia Anne Minson, a Notary Public in and for the District of Columbia, when were present on behalf of the respective parties:

8804035148

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C O N T E N T S

EXAMINATION BY COUNSEL FOR THE

WITNESS

COMMISSION

RESPONDENT

John L. Whitehead

By Mr. Levin and
Ms. Lerner

3

By Mr. R. Levin

61

By Mr. Levin and
Ms. Lerner

64

E X H I B I T S

NUMBER

FOR IDENTIFICATION

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2	38
3	42
4	51
5	54

38040675149

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1 APPEARANCES:

2 On behalf of the Federal Election Commission:

3 JONATHAN LEVIN, Esq.
4 999 E Street, Northwest
Washington, D.C. 20463

5 On behalf of John L. Whitehead and John Whitehead
6 and Associates:

7 ROBERT N. LEVIN, Esq.
8 1735 Eye Street, Northwest
Washington, D.C.

9 ALSO PRESENT:

10 LOIS LERNER, Esq.
11 Assistant General Counsel
Federal Election Commission

12 PATTY REILEY, Esq.
13 Federal Election Commission

14 -0-0-0-
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88040575150

1 Thereupon,

2 JOHN L. WHITEHEAD,

3 a witness, was called for examination by counsel for the
4 Federal Elections Commission and, having been first duly sworn
5 by the Notary Public, was examined and testified as follows:

6 EXAMINATION BY COUNSEL FOR THE FEDERAL ELECTION

7 COMMISSION:

8 BY MR. LEVIN:

9 Q Would you state your full name please?

10 A John L. Whitehead.

11 Q And the name of your business?

12 A John L. Whitehead and Associates.

13 Q What is the working address of John L. Whitehead and
14 Associates?

15 A It is 2006 Columbia Road, Northwest, No. 20,
16 Washington, D. C. 20009.

17 Q I am going to ask you a series of questions. If at
18 any time you don't understand the questions, just tell me and
19 I will try to reword the question in a way you will understand.
20 Is that clear?

21 A That's clear.

22 Q Are you represented by counsel today?

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1 A Yes, I am.

2 MR. LEVIN: For the record, my name is Robert Levin,
3 and I represent Mr. Whitehead in this matter.

4 BY MR. LEVIN:

5 Q Is he representing you personally?

6 A Yes.

7 Q Is he also representing the company?

8 MR. R. LEVIN: For the record, there isn't a company.
9 It is a sole proprietorship. It is Mr. Whitehead.

10 BY MR. LEVIN:

11 Q Have you ever had your deposition taken before?

12 A Yes.

13 Q Then you are aware that the court reporter is taking
14 down everything we say, and it would be difficult for her to
15 record gestures, so it is necessary that you answer verbally.

16 A Yes.

17 Q Since receiving the subpoena in this matter, have you
18 spoken with anyone about this deposition, or the answers you
19 will give today?

20 A Yes.

21 Q To whom have you spoken?

22 A I spoke to my counsel, and then I spoke to Mike Cohen

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1 of Working Names.

2 Q What did you say to Mike Cohen?

3 A I asked him if he could provide me with any informa-
4 tion that would be helpful to refresh my memory, going back to
5 early '82, due to the fact that I had no records in my
6 possession.

7 Q What did he say to you?

8 A He said that he would provide the needed records and
9 documents.

10 Q Anything else?

11 A Good luck.

12 Q The documents that you presented to us right before
13 the deposition, are those the documents that you are referring
14 to?

15 A Those are copies of those, right.

16 Q Did he present you with any other documents?

17 A No.

18 I'm sorry, he also provided me with copies of
19 interrogatories, Mike Cohen did, in this particular matter that
20 he had answered.

21 Q Are these interrogatories from the Commission that
22 you are referring to -- answers to interrogatories?

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1 A Yes, I think so.

2 Q Do you know how many sets of interrogatories there
3 were?

4 A No. I think it was just one.

5 MR. R. LEVIN: For the record, I think that it was
6 Mr. Whitehead's own answers to interrogatories. I don't want
7 to swear to it, but I think that it was your Matter 1549, if I
8 remember the caption.

9 MR. J. LEVIN: So it is not this matter.

10 MR. R. LEVIN: I don't think so. It had nothing to
11 do with this subject.

12 THE WITNESS: I am sorry, it was the Ernie Halter
13 matter which he was involved with. I am sorry, and I apologize,
14 it was the Ernie Halter matter.

15 MR. R. LEVIN: Also for the record, I obtained from
16 counsel for Mr. Cohen, who is involved in some litigation in
17 the Circuit Court for Montgomery County, an exhibit which I
18 assume is a a deposition which was one of the documents which
19 we supplied to the Commission earlier.

20 BY MR. J. LEVIN:

21 Q Have you, Mr. Whitehead, read anything in preparation
22 for this deposition?

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1 A I tried to reconstruct dates, various dates for what
2 states that I had visited and what names would have comprised
3 the various lists that were put together.

4 Q Are those in documents that this office, the Office
5 of General Counsel, has now?

6 A Yes.

7 Q You explained that John Whitehead and Associates is a
8 sole proprietorship.

9 A Yes.

10 Q What is the business of John Whitehead and
11 Associates?

12 A Basically to compile mailing lists and to give advice
13 to other people in the industry on the usage of various mailing
14 lists for various clients. It is a direct mail consulting
15 industry.

16 Q As a sole proprietorship right now, I assume you have
17 no partners.

18 A That's correct.

19 Q Have you ever had any partner?

20 A Officially, no.

21 Q Could you clarify, "officially"?

22 A As far as partners per se, no.

8 3 0 4 0 6 3 5 1 5 5

1 Q Have you ever had any employees?

2 A I had someone working for me parttime.

3 A When was that?

4 A That was approximately in early 1982.

5 Q Who was that?

6 A Thomas Mays, Jr.

7 Q What did he do in his capacity as working for you
8 parttime?

9 A He assisted me in going to various states and helping
10 me put together the mailing list on the state level, and bring-
11 ing the mailing list back to Washington, sorting them out,
12 editing, and then taking them over to the various people who
13 purchased the lists.

14 Q When he assisted you, did he go to the state offices?

15 A Yes.

16 Q With you?

17 A Both.

18 Q Sometimes on his own, and sometimes with you.

19 A That's correct.

20 Q Did you also write letters to some of the state
21 offices, those that you did not go to, or even some that you
22 did go to?

3 3 0 4 0 5 1 5 6

1 A Yes, primarily phone calls, but some letters were
2 written.

3 Q Did Mr. Mays also write letters?

4 A Some letters possibly, but mostly all phone calls.

5 Q Did you review all of Mr. Mays's work?

6 A At the start, I would say, yes, completely. He was
7 new in the business and had absolutely no background in the
8 business. Further on, yes, I did.

9 Q At what point did you not review Mr. Mays's work,
10 either in terms of his relation of telephone conversations to
11 you, or a copy of a letter that he would have written?

12 A I would say, in almost all cases, I did review his
13 work when he was working for me.

14 Q What dates did you say that he worked for you?

15 A I think we said the starting date was early 1982,
16 let's say, March 1982, through possibly early 1983.

17 Q March of 1983, or as late as April 1983?

18 A Probably April of '83, yes.

19 Q I am going to ask you a series of questions dealing
20 more specifically with what the company does. You state that
21 you go around to various offices of secretaries of state or,
22 I presume, lieutenant governors; is that correct?

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1 MR. R. LEVIN: May I interrupt for one second?
2 Are you still doing that for Whitehead and
3 Associates?

4 THE WITNESS: No.

5 MR. R. LEVIN: I didn't mean to interrupt, but I
6 thought we should clear that up.

7 BY MR. J. LEVIN:

8 Q When did that cease to be active?

9 A The major activity, I would say, ceased in like April
10 of 1982.

11 Q So you no longer engage in list compilation.

12 A I do list consulting, but not compilation, or on rare
13 occasions I do list compilation for the company that I am
14 employed by, List America.

15 Q You are now employed by List America.

16 A That is correct.

17 Q What do you do as a list consultant, then?

18 A I would advise people on the type of list that various
19 organizations would use for their fund raising solicitations.

20 Q Do you do any list brokering?

21 A No, I do not.

22 Q Do you engage in list mailing, let's say, with the

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1 company that was mailing out a list for solicitation?

2 A No. My function would be described as list management.

3 Q Something along the lines of what Meyer Cohen in
4 Working Names does?

5 A No, it's not.

6 Q When you were in the list compilation business, from
7 where did you obtain the names?

8 A Various state agencies. In almost every state, it
9 could be the board of ethics, or the board of elections. In
10 most cases, I think they are connected with the various
11 secretaries of state, but they are known as various agencies
12 within a state.

13 Q These are agencies that have as their function the
14 disclosure of reports of candidates and political committees?

15 A That's correct.

16 Q Did you obtain any names from the Federal Election
17 Commission at 1325 K Street?

18 A No.

19 MR. R. LEVIN: When?

20 BY MR. J. LEVIN:

21 Q During the time that you were engaged in list
22 compilation?

8 3 0 4 0 5 5 1 5 9

1 MR. R. LEVIN: That is over 20 years.

2 The question is, John, did you ever get names of any
3 kind from the Federal Election Commission?

4 BY MR. J. LEVIN:

5 Q When was that?

6 A Back when I was probably working for Richard Vigurie
7 or Steve Winchell, I would get informational reports for them.
8 They would take on particular clients, and these people were
9 involved in fund raising themselves, and they would need to
10 know how much their opponent had spent in the previous election
11 on advertising and things like that to map out the campaign.

12 Q Were these for purposes of compiling lists?

13 A No.

14 Q When you go to the state agencies, what procedure do
15 you go through?

16 A Most of it is different in each state. Some, you
17 call them on the phone and you give them a list of what reports
18 you would like to have, and they will have a copy waiting for
19 you when you get there and you pay them. Other states, you
20 have to actually go to the files and extract them, run a
21 photo-copying machine or use theirs, if there is one available,
22 and pay for them, and they are yours. You purchase them.

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1 Almost every jurisdiction has various rules.

2 Q Do you specify what kind of reports you want, other
3 than -- Let me strike that.

4 Do you specify what kinds of reports you want?

5 A Yes.

6 Q What kind of specifics do you state to them?

7 A It is usually based on the office that the candidate
8 ran for, major candidates, i.e., governor, lieutenant governor,
9 attorney general, party reports, Republican, state, central
10 committees in the state.

11 Q Do you ever ask for reports for Federal candidates?

12 A No.

13 Q When you ask for reports for party committees, do you
14 state what account of that party committee you want?

15 A Usually the state committee report.

16 Q Do you ever not do that?

17 A No.

18 Q In other words, you always specify that you want the
19 state account.

20 A Right, and certain states do not have a state account,
21 or it is not required to be filed with that office, therefore,
22 I would get the candidate for governor or lieutenant governor.

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1 Q And you would not get the report that does not
2 distinguish between the state and the Federal accounts.

3 A That's correct.

4 Q Are there any states where you have the opportunity to
5 go into the files and look for whatever reports you want,
6 without having to ask for a specific report first from someone
7 at the desk or someone in authority at whatever record room
8 they have?

9 A In a rare instance, that may be a possibility. I
10 can't say that in the past it has not occurred, but it is not
11 the usual procedure at all. Usually you give a written form
12 requesting candidates and the time period in which the report
13 took place, then they would give you the reports.

14 Q And you take only state reports.

15 A Yes.

16 Q When you see a report that might have state and
17 Federal candidates, do you decide not to take that report off
18 the shelf, as they say?

19 A In most instances, the Federal candidates are listed
20 separately. They will have a list of state candidates, and
21 then they will have a list of Federal candidates in almost all
22 procedures.

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1 Q Have you ever taken reports from the National
2 Conservative Political Action Committee?

3 A No.

4 Q Why is that?

5 A The NCPAC reports?

6 Q Yes.

7 A Basically, as far as I understand, they are a Federal
8 committee which falls under the FEC prohibition to obtain. I am
9 also familiar with the procedures NCPAC uses, and I know the
10 people fairly well.

11 Q When you compile the reports, what is the next step?
12 How are they useful to you? I am sorry, compile the list of
13 names.

14 A We ship them back. They would be shipped back to the
15 office.

16 MR. R. LEVIN: What is being shipped back to the
17 office?

18 THE WITNESS: The raw data, photocopies of the actual
19 reports that have been filed with various state agencies. At
20 that point, Tom Mays and myself would sort them out by candi-
21 dates based on political ideology, party, whether they ran for
22 a local office, or whether they ran for a statewide office,

8 3 0 4 0 6 5 1 6 3

1 whether they had any strong stands on gun control, or pro-life,
2 or any other category, pro-family issues. We would, at that
3 time, do some editing. Editing means going through and mark
4 out corporations, political action PACs that give to campaigns,
5 and incomplete addresses. We would batch them up, usually in
6 two or three hundred pages per batch, and Tom would transport
7 them over to Working Names.

8 BY MR. J. LEVIN:

9 Q To your knowledge, what does Working Names do with
10 these?

11 MR. R. LEVIN: Counsel, you keep using the present
12 tense. You understand that we are talking about '82 and '83.

13 BY MR. J. LEVIN:

14 Q During that time period. When I use the phrase,
15 "during that time period," we will restrict it to the time
16 period of '82 and '83 previously specified at the beginning of
17 this deposition.

18 A At that point, my involvement was over.

19 Q To your knowledge, what did Working Names do with
20 them?

21 A I understood that he would have them keypunched and
22 various lists would be created from this material, using these

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1 names and other names which he had in his possession.

2 Q When you did batch them and sent them over to Working
3 Names, did you send them the reports themselves, or did you send
4 them the lists of names that you had compiled?

5 A We would send the various names that we had purchased
6 from the various state agencies.

7 Q In other words, did you send them the report copies,
8 or did you send them lists of names under the categories that
9 you have noted?

10 A No, we would send them the reports themselves.

11 MR. R. LEVIN: How would Mr. Cohen and his associates
12 know the names were conservative, Republican, or even Democrats?
13 When you did the editing, how did that information get commu-
14 cated to them?

15 THE WITNESS: The boxes would be marked, Republicans,
16 Moderate Republicans, Liberal Democrats, Jewish Donors, et
17 cetera.

18 BY MR. J. LEVIN:

19 Q Was it your understanding that Mr. Cohen would add or
20 subtract names from the list that you gave him?

21 A Most definitely, yes.

22 Q Do you know from what sources he would take names?

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1 A He is in a similar type of operation in which he
2 acquires mailing lists from various sources. These names would
3 be merged with existing names to create a mailing list, and
4 owner income would be distributed on a percentage basis. If I
5 gave him 25,000 names, and he had 100,000 names, then I would
6 have a percent of that list, the total list.

7 Q So that Mr. Cohen would possibly add 75,000 names to
8 a list to compile a list under a name such as Truly Conservative
9 Contributors.

10 A Sure.

11 MR. R. LEVIN: For the record, Counsel, you asked him
12 what happened to the lists he sent them. For the record, let
13 me be clear, Mr. Whitehead did not supply lists, but Xerox
14 copies of Schedule As.

15 MR. J. LEVIN: Correct. Thank you.

16 THE WITNESS: Various states have different names,
17 but Schedule A is prominent.

18 BY MR. J. LEVIN:

19 Q Do you have any knowledge of where Mr. Cohen obtained
20 his names?

21 A No.

22 Q You have no knowledge as to whether or not he went

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1 through the same thought processes that you did, or the same
2 actions in terms of asking for state reports?

3 A No, but probably not. If he was going through the
4 same procedure, then he would not have needed me. So he was
5 getting his from other sources, and the sources I do not know.

6 Q I wanted a clarification of "probably not."

7 A Yes, I did not mean, "probably not," but it would not
8 have made sense if he was getting them from the same sources I
9 would because there would be a duplication. He was getting
10 them from other sources. In the industry, it is very common
11 to make agreements with Congressmen and Senators to manage their
12 files. A lot of Congressmen's and Senators' files are managed,
13 and Working Names manages quite a few various Members of
14 Congress's files.

15 Q So that he would take the names from their actual
16 private lists, perhaps, as opposed to a list that would be on
17 file in any state agency.

18 A I hesitate to say that. I have no knowledge of his
19 workings.

20 Q My only question is whether or not you have any
21 knowledge of whether he goes through the same restrictions that
22 you say you put yourself through.

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1 A As far as I know, I have never discussed with him his
2 list gathering procedures.

3 Q What happened to the names that you have given to Mr.
4 Cohen? Do they then become a list?

5 A Several lists are created. If he has a lot of
6 requests for very conservative Republicans, my conservative
7 Republicans, or the box that I have marked "Very Conservative
8 Republicans," would probably have been added to that existing
9 list to give it greater volume, and then it would be marketed as
10 a Very Conservative or under a different name.

11 Q How then are you paid for what you do, or what were
12 you paid during this time period?

13 A It was an understanding between Working Names that I
14 would be paid a percent due to the number of names which were
15 added to an existing file. A percent would be determined as
16 to what percent my names involve the total list.

17 Q And Mr. Mays would pay you? Excuse me, Mr. Cohen
18 would pay you?

19 A At one point, Mr. Cohen was paying Tom Mays totally.
20 At the time at which I gave the list over to Tom, it became
21 Tom's income solely.

22 Q Did Tom Mays pay you any percentage of the income?

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1 A Probably, but very, very small. I had advanced Tom
2 some money. Up to a certain point, Tom was getting all of the
3 money, and at the time that I loaned him money to buy a car,
4 then the checks started to be put in my name, and I gave Tom
5 some additional income. There wasn't a lot of income generated
6 up to a certain point.

7 Q So you are saying that the money that Tom Mays paid
8 to you was due to the money that you loaned him for the car.
9 Is that what you are saying?

10 A That is correct, but he also gave me, from time to
11 time, some additional money for expenses.

12 Q Did Tom Mays consider you to have an interest in the
13 list until the payment of the car was made?

14 A We had discussed the potential income, and we had
15 come to a conclusion that there would be very little money to
16 be distributed.

17 Q Did you ever charge Mr. Mays for the list which he
18 gave, or when he gave the list to you?

19 Did you ever charge Mr. Mays for the list when you
20 gave to him?

21 A Which list are we talking about?

22 MR. R. LEVIN: The record, I think, is really very

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1 confused. I think that it might be helpful just to take him
2 through the chronology instead of hopping in and out.

3 MR. J. LEVIN: I will do that very shortly. I want
4 to get a general sense of how things operated during that time.

5 MS. LERNER: Could I ask a couple of questions?

6 MR. J. LEVIN: Sure.

7 BY MS. LERNER:

8 Q You indicated that at some point, you gave a list to
9 Mr. Mays.

10 A That is correct.

11 Q At that time, you did not think that the list was
12 going to generate very much income. Is that right?

13 A That's right.

14 Q At some later point, you made a loan to Mr. Mays.

15 A That's correct.

16 Q And as part of his repayment to you of the loan, he
17 was giving you a percentage of funds that he was obtaining by
18 the list. Is that right?

19 A It originally started out that he would pay me from
20 his salary. He obtained a full-time job in the meantime. He
21 no longer was in the list gathering business. He obtained a
22 full-time job, and at that point he was going to pay me back a

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1 certain amount of money from his salary. But as the list
2 started generating income, he then said, "John, why don't I --
3 rather than pay you from my salary, why don't I give you the
4 money that is coming in from Working Names and pay it off like
5 that.

6 Q At the time when you gave him the list, was there any
7 arrangement whatsoever for you to receive payment that was
8 generated from that list?

9 A No.

10 BY MR. J. LEVIN:

11 Q Are we talking about the list "Truly Conservative
12 Contributors" now?

13 A Mr. Levin, at the time, the lists were unnamed. The
14 source material was unnamed. It was almost a year later until
15 Tom Mays started getting checks with statements that we actually
16 knew that there was a list out there called "Truly Conservatives."

17 Q When you say, "a year later," what time are we
18 talking about then?

19 A Probably early 1983.

20 BY MS. LERNER:

21 Q So actually you did not give Mr. Mays a list. You
22 did not give him a compiled list.

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1 A No.

2 Q You gave him the names that you had gathered from the
3 secretaries of state.

4 MR. R. LEVIN: I think what he is saying is that he
5 gave him his interest in those names, and the names had already
6 been physically conveyed somewhere else.

7 BY MS. LERNER:

8 Q It is not the list after the list was made up. You
9 are talking about interest in the same things that you had
10 gathered from the secretaries of state.

11 A Yes.

12 BY MR. J. LEVIN:

13 Q Do you know of the list "Truly Conservative
14 Contributors"?

15 A Yes.

16 Q Who owns this list to your knowledge?

17 A As far as my knowledge, it is partnership now with
18 Working Names, Mike Cohen, Harriet Heyman, who are partners in
19 Working Names, Victor Heyman of Heyman Consulting, and Tom
20 Mays, Jr.

21 Q Could you repeat that list again?

22 A Working Names owns -- This is my understanding.

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1 Working Names owns 50 percent. Working names is a partnership
2 of Mike Cohen and Harriet Heyman. Victor Heyman of Heyman
3 Consulting owns 25 percent, and Tom Mays owns 25 percent.

4 Q Do you have any interest in that list?

5 A Of that list in particular, no.

6 MR. R. LEVIN: Do you continue to get income off of
7 that list?

8 THE WITNESS: No. There has been no income generated
9 off of that list as far as I know in six months. It is an old
10 list. In the industry, a list is good for, let's say, two or
11 three years. In other words, the life of that particular file
12 is pretty much over with. It is a closed book.

13 BY MR. J. LEVIN:

14 Q At some point, you did obtain income from that list?

15 A That's correct.

16 Q What point was that?

17 A Again going back, it would probably be in early
18 1983.

19 Q Mr. Mays was still working with you at the time.

20 A Yes. Working with me, but not working with me any
21 more.

22 Q Who compiled the names that went on this list?

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1 A What list?

2 Q Truly Conservative Contributors.

3 Let me ask you this. Do you know the source of the
4 names for Truly Conservative Contributors, or sources?

5 A I know a partial input.

6 Q What was that partial input?

7 A That was the input that Tom Mays and myself compiled
8 and gave to Mike Cohen, but it was a portion of it. All of
9 these lists were or groups of names were pulled from computer
10 sources to make one list.

11 Q Could you explain? What computer sources?

12 A When they were keypunched. Heyman of Heyman Consult-
13 ing did the keypunch work for all of the lists. Let me explain.
14 Mike Cohen manages 150 lists, all with various names, Truly,
15 Active, Good, Nice, that type of names. It is very common in
16 the list business to compile -- various portions of one file
17 will be included in another file, so the same 5,000 names that
18 went in to make Truly might also have been in Golden Conser-
19 vatives because that particular file called for California
20 Conservatives only. Therefore, they would take 5,000 of the
21 Truly Conservatives and put them into the Golden Conservatives.

22 Q Do you remember specifically when Mr. Mays -- Did

8 3 0 4 0 5 7 5 1 7 4

1 you say that you had compiled that list as well -- compiled the
2 names as well?

3 A I worked with Tom. Tom did the compiling, yes.

4 Q Do you remember specifically when these names had
5 been compiled?

6 A These names, the names that we are talking about, are
7 for Truly?

8 Q Truly Conservative Contributors.

9 A I can only give you an answer as to our particular
10 input into that, or Tom Mays's input into that. It was in
11 approximately March or April '82, but the income was not
12 generated for almost one year because it takes approximately
13 five months to keypunch them and get them in order, and put
14 them out, and then the money starts coming back. It is about
15 nine months from the date that you put your list on the market
16 that any income is generated from the file.

17 Q Can you recall what states you and Mr. Mays obtained
18 these names from?

19 A I can give you a general list, it would not be a
20 complete list, from memory: Texas, Ohio, California, Florida,
21 Louisiana -- Did I say, Ohio?

22 Q Yes.

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1 A Virginia, Georgia, and North Carolina, also possibly
2 New York.

3 Q Alaska?

4 A Alaska, we would not travel to Alaska because of the
5 location, we would just write and ask for the reports. One of
6 the state agencies up there has the reports. I am not sure
7 which office has it, but Alaska is one of the states.

8 MR. R. LEVIN: The question is whether you obtained
9 names from Alaska for this compilation?

10 THE WITNESS: I believe Alaskan names were included.
11 I can't say for sure about Alaska.

12 BY MR. J. LEVIN:

13 Q I am going to ask you about some more states and see
14 if it would comport with what you are saying.

15 A Okay.

16 Q Pennsylvania.

17 A Again, we are talking about several years. I can't
18 say that Pennsylvania was included. I can't say if it was
19 included, no.

20 Q Delaware.

21 A Probably not.

22 Q Maryland.

8 8 0 4 0 5 3 5 1 7 6

1 A Maryland, yes.

2 Q Mississippi.

3 A Yes.

4 Q Georgia.

5 A Yes.

6 Q Connecticut.

7 A I am not sure.

8 Q Michigan.

9 A I don't believe so. I am not sure on that one either.

10 Q West Virginia.

11 A Yes.

12 Q When you went to the offices that you went to, or
13 that Mr. Mays went to, did you make inquiry -- What sort of
14 inquiries did you make as to these contributor reports for
15 Truly Conservative Contributors?

16 A I never went out ---

17 MR. R. LEVIN: Objection. Counsel, that is not what
18 he testified to. He testified that there was no such thing as
19 Truly Conservative at the time he was doing this.

20 MR. J. LEVIN: At the end of my question, I added,
21 for the list that became Truly Conservative Contributors in
22 order to clarify that.

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1 THE WITNESS: Do you want me to go over the general
2 procedure as far as how they obtained the list?

3 BY MR. J. LEVIN:

4 Q Yes.

5 A If it was a state in which you could call ahead and
6 ask them to pull the files for you, and even do the copying
7 for you, such as Florida would do that for you and Texas --
8 Procedures in the various states change from administration to
9 administration. The office under one administration will be
10 organized totally differently. I would give them a list of the
11 candidates that I would like to see the reports on, who have
12 reports and, depending on the procedures in the office itself,
13 I would make the copies myself or Tom Mays would make copies,
14 or they would make the copies for us. So it strictly depended
15 upon the various jurisdictions that we were in.

16 Q Did you make inquiry as to whether these were contri-
17 butors to state or federal candidates?

18 A I knew that already. I keep up with politics and I
19 have a list of all of the state candidates. The first thing I
20 did when I went into a state, I would ask to see the election
21 p primary and the general election candidates, the certified
22 ballot candidates. Then I would make up my list from the

8 3 0 4 0 5 7 5 1 7 8

1 people who were on the ballot on the primary and the general
2 election.

3 Q These did not include NCPAC contributors.

4 A No, these would be candidates for office. PACs and
5 committees are filed in various states separately, in most
6 states.

7 Q Did you go to those offices for the PAC contributions
8 or did Mr. Mays go to those offices for the PAC contributions?

9 A No, unless the PAC contributors were in the same
10 office. He or I would not make a special trip to an office in
11 the secretary of state's office or anything to look at PAC
12 contributors, because I am not interested in PAC donors.

13 Q Did you make inquiries as to the PAC donors, as to
14 whether these PACS were contributing to Federal versus state
15 candidates, or did Mr. Mays, to your knowledge, do the same?

16 A He did not. Most states have state PACs which are
17 legal to obtain in the same manner that I described. We would
18 not be interested in the Federal PACs, and NCPAC being a
19 Federal PAC, it would be excluded.

20 MR. J. LEVIN: I am handing a document to the reporter
21 to be marked FEC Exhibit No. 1, and I am showing the document
22 to Respondent and counsel.

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1 (The document referred to
2 was marked FEC Exhibit
3 No. 1 for identification.)

4 BY MR. J. LEVIN:

5 Q Have you this document before, FEC Exhibit No. 1?

6 A Yes.

7 Q Can you identify the document for the record?

8 A It's a list order fulfillment form which Working
9 Names generated for their client, the American Bible Society.

10 Q What is the purpose of this fulfillment form?

11 A That is a form, which the broker and the manager,
12 in this case Mike Cohen's Working Names, would have generated
13 to fulfill an order for his various lists, this one in
14 particular, Truly, for his client, American Bible Society.

15 Q Is this a bill of any sort?

16 A No. This is a copy of an order which Mike Cohen
17 generates. It is an internal record. This is actually telling
18 the computer house, in this case, Heyman Consulting, to run
19 5,000 names from the Truly Conservatives and ship them to
20 American Bible Society. This is an internal part, and this is
21 not affecting the list owner. In other words, this is a form
22 between Heyman Consulting and Mike Cohen.

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1 Q I am going to refer you to the bottom half of FEC
2 Exhibit No. 1.

3 A Okay.

4 Q As to the states referred to there, do you have a
5 sense of how many other states were involved in compiling Truly
6 Conservative Contributors?

7 A You see the problem -- I have no knowledge, but if
8 you were compiling something in, let's say, the State of
9 California, you would have names from -- A better example is
10 Texas. When Bill Clements ran for Governor of Texas, for
11 instance, he might have gotten contributions from all 50 states.
12 So, therefore, if you never go, for instance, to Montana or
13 Kansas and Nebraska, which I probably didn't do because of the
14 distance and the difficulty of acquiring names, he might still
15 have Kansas names in the file, and he might have all states in
16 his file.

17 In other words, any names obtained, let's say, from
18 seven states probably would have some from all 50 states due to
19 the fact that people in Kansas might be giving to a candidate
20 in Texas or especially a popular figure, let's say, like
21 astronauts running for governor, or sports figures running,
22 they may do nationwide fund raising.

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1 If they had a nationwide fund raiser, i.e., Vigurie or
2 Steven Winchell, then names would be solicited from all over the
3 country on behalf of a candidate running in Indiana or Wisconsin.

4 Q Let me ask you this: What went into your considera-
5 tion in compiling the names that eventually became Truly
6 Conservative Contributors? What went into your consideration
7 as to what states you would either go to or write to?

8 A Due to the limited budget that Mike Cohen wanted to
9 spend on compiling these particular segments of the lists,
10 because these were untested -- Mike Cohen is identified basic-
11 ally in the industry with liberal and Democratic files -- I
12 would not -- I selected only the names that were readily
13 available and inexpensive, and easy to edit. For instance,
14 there might be names in Pennsylvania, but they might have been
15 handwritten and unzipped, I would not have bothered with those.

16 Q You mentioned that you had written to Alaska. Are
17 there any other states that instead of going to, you wrote or
18 Mr. Mays wrote?

19 A I don't know about Mr. Mays.

20 MR. R. LEVIN: I am not trying to be obstructive, but
21 he testified three times that there were more phone calls than
22 letters. I am not trying to be obstructive, but I want the

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1 record to be clear. I don't think that he was ever asked:
2 Did you write to Alaska, or was it a telephone call to Alaska?
3 I would like the record to stay clear.

4 MR. J. LEVIN: The question is directed at his know-
5 ledge. If he can only recall to a certain extent, then that
6 will be satisfactory.

7 MR. R. LEVIN: The thing is, I don't know that it is
8 of record whether he wrote to Alaska or telephoned Alaska.

9 MS. LERNER: He indicated that they did write request-
10 ing things from some states. Let's go back and ask, first of
11 all, if he recalls whether he wrote to Alaska; and, second of
12 a ll, does he recall writing to any other states.

13 MR. R. LEVIN: That's fine.

14 THE WITNESS: I don't recall if it was either phone
15 or writing. I did write to certain states, and phone calls were
16 made, I cannot say that I wrote to Alaska or called Alaska, it
17 has been too long ago.

18 BY MR. J. LEVIN:

19 Q Do you have any idea how many states?

20 A For this particular project?

21 Q Yes, for this particular project.

22 A No, I don't.

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1 Q Okay.

2 I am going to refer you to the last line on this
3 document, the reference is to "salt" initials, and it says,
4 What is the significance of that?

5 A In the industry, every order that is generated by a
6 list manager, in order to protect the list and make sure that,
7 in this instance, American Bible Society was not using the list
8 twice, they will put a "salt," or a fictitious name in there,
9 and that helps to track the use of the file. That is done by
10 the list manager. But it is commonly done by all.

11 Q So Mr. Cohen was the one who decided on this.

12 A Yes.

13 Q We discussed before your arrangement with Mr. Mays as
14 far as receiving the payment, and the payment also for the car,
15 but I never put this question directly to you. Did you have or
16 ever have an ownership in the list itself, in Truly Conservative
17 Contributors, an ownership interest?

18 A Not the list Truly Conservatives. I did not know that
19 the list Truly Conservatives existed until payment was received
20 a year later, after the things had been compiled.

21 Q Did you have an ownership interest in the names
22 themselves?

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1 A I had interest in names that Mike Cohen had. In
2 other words, he was taking my names and forming 25 different
3 mailing lists. I held interest in names, and currently have
4 interest in a list that Mike has.

5 Q Did you have any interest in the names that you gave
6 to Mr. Mays after you gave him those names?

7 A No, at that time, I had decided that the list was not
8 going to make money, and I was busy with so many other projects,
9 I told him that if he could make anything with it, if he wanted
10 to work on it full-time, he was welcome to it. It was like
11 giving him everything of nothing at the time.

12 Q So the money that you would get from that was not out
13 of a proprietary interest, it was out of the fact that Mr. Mays
14 -- It was not as if you had some kind of a lien on names, it was
15 just agreed that Mr. Mays would pay you the money that he got
16 from those names because of what he owed you on the car. That
17 is what I am trying to establish.

18 MR. R. LEVIN: May I ask, did there come a time,
19 John, after you had given your interest in the names to Tom
20 Mays, where you once again had an interest in the income off of
21 those names?

22 THE WITNESS: Yes.

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1 BY MR. J. LEVIN:

2 Q What time was that?

3 A It would be approximately, I would say, probably April
4 or May of 1983, at the time at which I had loaned him the money
5 for the car, at that point the interest being, in fact, that he
6 would pay me back from the income that was being generated. At
7 that time, the names had taken off quite well. We sat down and
8 we agreed that we would, from hereon, after the loan was paid
9 back, we would split it 50-50.

10 MR. R. LEVIN: John was making a point that perhaps
11 should be on the record.

12 THE WITNESS: The user, American Bible Society, has
13 requested names from these particular states, and the list
14 manager gives the computer house instructions. There may not
15 be any in the states, but if there are any in the states, they
16 include them.

17 In other words, like for South Dakota, I would almost
18 say that there are probably no South Dakota names in that Truly
19 Conservative file, but the owner is saying, if you have them,
20 provide these states for me. That is all he is telling the
21 computer operator. It is like, if they are there, I want them.

22 MR. J. LEVIN: I am handing the reporter documents to

3 3 0 4 0 5 3 5 1 8 6

1 be marked as FEC Exhibit No. 2, and I am handing FEC Exhibit
2 No. 2 to counsel for the respondent.

3 (The document referred to was
4 marked FEC Exhibit No. 2 for
5 identification.)

6 MR. R. LEVIN: Counsel, we will stipulate, if it will
7 save any time, that what has been marked as Exhibit No. 2 are,
8 in fact, accurate Xerox copies of checks from Mr. Whitehead to
9 Mr. Mays, and these are part of the documents that we turned
10 over in response to the subpoena.

11 BY MR. J. LEVIN:

12 Q These documents are checks. What do these checks
13 represent? Take your time to look at them.

14 A These represent checks with which I gave Mr. Mays
15 money for work that he performed for me.

16 MR. R. LEVIN: If I may, turning your attention, Mr.
17 Whitehead, to page 1, the first check dated 5/6/83, what was
18 that check for?

19 THE WITNESS: That was a trip which we took and he
20 used his car, and I reimbursed him for the expenses, the mileage,
21 et cetera.

22 MR. R. LEVIN: The next check down, Check dated

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1 1/24/83, for \$2,000, what was that for?

2 THE WITNESS: That was a check which I gave to Tom.
3 His mother needed a loan to buy something, and it was subse-
4 quently paid.

5 MR. R. LEVIN: The check for 1/22/83.

6 THE WITNESS: That was probably for miscellaneous
7 expenses.

8 MR. R. LEVIN: The second page --

9 MS. LERNER: I think that we can probably cut through
10 this a little. Would you look through the checks and indicate
11 whether any of the checks relate to payments concerning the
12 names that ultimately went into the list Truly Conservative
13 Contributors.

14 THE WITNESS: I could not say that. I could not say
15 that because these represent payments for him doing various
16 projects for me which would involve numerous lists.

17 BY MS. LERNER:

18 Q There is nothing specific that you can recall with
19 regard to the particular names that we are talking about.

20 A No.

21 Q Some of these checks, however, may have represented
22 payments for his work in gathering names for you; is that

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1 true?

2 A Gathering names for me, but not necessarily in this
3 particular project. It could have been other list gathering
4 endeavors.

5 MR. R. LEVIN: Mr. Whitehead, do any of these checks
6 represent payments from you, a sharing by you with Mr. Mays of
7 funds received from Working Names, Inc., or Mike Cohen?

8 THE WITNESS: Yes.

9 MR. R. LEVIN: Would you tell us which checks are
10 those?

11 THE WITNESS: I could not say, but I would have to
12 say the checks on the last page.

13 BY MR. J. LEVIN:

14 Q Which check is that?

15 A The last two checks, I am sure, would represent that.
16 They would represent a share. If Mike Cohen had made the
17 entire check out to me, then that would have been probably 50
18 percent of, or a share of it.

19 Again, it is hard to say. I think, on the second
20 page, the bottom check definitely was.

21 BY MS. LERNER:

22 Q You stated that you had given Mr. Mays the names, or

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1 the interest in the names that we are talking about during this
2 period. Now you are indicating that Mr. Cohen would make checks
3 out to you, rather than to Mr. Mays for the monies that came in
4 based on those names. Was that the regular practice?

5 A Remember, the major bulk of the income that Mr. Cohen
6 was paying me was for other lists. I helped create New York,
7 New York, Jewish Donors, and things like that, so I was still
8 getting income from Mr. Cohen for those other lists.

9 The lists which Tom had an interest in, Truly and Nice,
10 were to the point of making very little money, so he would
11 include Tom's income in the check to me.

12 Q Are you aware of any situations where he wrote a check
13 to Mr. Mays which would include the monies that came in from
14 his interest, rather than writing you a check?

15 A I don't think I understand that.

16 Q You indicated that Mr. Cohen's checks covered monies
17 owed to you from names that you had given him, including, but
18 not limited to, the names that Mr. Mays had received from you.

19 A Yes.

20 Q Do you know if Mr. Cohen ever gave Mr. Mays checks
21 representing payment just related to the names that you had
22 given Mr. Mays?

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1 A I do not know that.

2 MR. J. LEVIN: I am handing the reporter documents to
3 be marked as FEC Exhibit No. 3, and I am handing copies of that
4 document to respondent and his counsel.

5 (The document referred to was
6 marked FEC Exhibit No. 3 for
7 identification.)

8 BY MR. J. LEVIN:

9 Q Have you ever seen Exhibit No. 3?

10 MR. R. LEVINE: As an exhibit, or simply the
11 documents?

12 BY MR. J. LEVIN:

13 Q The documents contained in Exhibit No. 3.

14 A I'm sure I have.

15 Q Do you know when you would have seen those documents
16 contained in Exhibit No. 3?

17 A I saw them when Mike Cohen supplied me some informa-
18 tion approximately a month ago, or after I received the
19 request.

20 Q Can you describe what these documents are?

21 A These are the manager's records of the income split.

22 Q Do these represent payments to you or from you to

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1 Working Names?

2 A These would represent payments to me, or to Tom Mays.

3 Q Why did Working Names send the invoice to you rather
4 than Thomas Mays?

5 A Because Tom was living in my apartment at the time, at
6 my address. Mike would send almost all of the correspondence to
7 me, it was directed to my address.

8 Q Did Mr. Cohen treat you as the person responsible for
9 the names on these lists?

10 A What lists?

11 Q The list that became Truly Conservative Contributors.

12 A I can't answer that, I don't know.

13 Q These payments that are on these documents, Exhibit
14 No. 3, do they reflect a percentage of any interest in these
15 names on either your part or Mr. Mays's, in other words, an
16 ownership interest?

17 MR. R. LEVIN: I object. The documents state what
18 they are, and they say what they say.

19 THE WITNESS: This is Working Names' records.

20 BY MR. J. LEVIN:

21 Q If you can't recall.

22 A I can't recall. I have no knowledge.

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1 Q If you cannot recall --

2 MR. R. LEVIN: The question was: Do these show a
3 percentage interest, and the answer is that they speak for
4 themselves.

5 MR. J. LEVIN: No.

6 MR. R. LEVIN: That was your question, Counsel.

7 MR. J. LEVIN: The question was, do they reflect.

8 MS. LERNER: He did not say percentage interest, but
9 ownership interest.

10 MR. J. LEVIN: If he can't recall.

11 BY MR. J. LEVIN:

12 Q Have you worked with Victor Heyman or the Heyman
13 Consulting Group in the past?

14 A No.

15 Q Did you have any contact with them -- any contact,
16 not necessarily working them -- pertaining to the names that
17 became Truly Conservative Contributors?

18 A I can't say that I ever did. I can't say I did.

19 Q Have you had any business contact with them at all in
20 the past few years, let's say, three years?

21 A With Heyman, no, other than I have seen him. I met
22 him with other people, but I have never entered into any

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1 agreement with him, no.

2 Q Do you have any knowledge as to whether or not he
3 could have added names to the list Truly Conservative
4 Contributors?

5 A I have no proof that he did.

6 Q Do you have any reason to believe that he did?

7 A Yes.

8 Q What is that reason based upon?

9 A The amount of names that I assisted Tom in acquiring
10 for these various mailing lists numbered no more than 100,000
11 maximum, and after Tom started receiving income checks, I made
12 some inquiries of Tom as to -- The income was too great for the
13 number of names on the mailing list. Tom was informed by Mike
14 Cohen and Victor Heyman that, in fact, there were approximately
15 380,000 in the file at this point. The income generated would
16 reflect the higher number rather than the lower number.

17 Q What is the source of your information?

18 A Mike Cohen.

19 Q Anyone else?

20 A Just Mike Cohen.

21 Q Thomas Mays as well?

22 A Thomas Mays was told by Mike Cohen also of the total

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1 numbers.

2 Q Have you worked with Meyer Cohen and Working Names in
3 the past?

4 A Yes.

5 Q When was that?

6 A I probably had my first business dealings with Meyer
7 Cohen, or Mike Cohen, in possibly 1979.

8 Q Have you been working with him consistently since
9 then, or how would you characterize it?

10 A Not consistently. Probably several requests to help
11 him compile mailing lists for various clients, but not on a
12 regular basis.

13 Q When you do business with Mike Cohen -- You said that
14 you stopped the list compilation in 1983. Until that time, was
15 your function list compiling and his the list management?

16 A Yes, but I was only one of many suppliers that Mike
17 would have had. I would not have been his chief supplier even.

18 Q I understand.

19 A Also, I was a consultant.

20 Q Since April of 1983, the cut-off date that you
21 mentioned before, have you done business with Mike Cohen?

22 A Yes, on small lists.

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1 Q What do you do in that?

2 A I gave him some advice on where to obtain some donors
3 to black candidates, and various other files.

4 Q What functions did Mike Cohen perform with respect to
5 the names that became Truly Conservative Contributors?

6 A The way I understand it, Mike's function was to be
7 manager, and his function would include advertising the names,
8 taking the orders for the names, cutting the orders which is
9 this right here.

10 Q You are referring to Exhibit 1.

11 A Yes, Exhibit 1, and collecting the monies for the
12 lists from the users.

13 Q Did he add or subtract names to Truly Conservative
14 Contributors?

15 A He would have the right as the marketing agent to,
16 if he considered the list to be doing poorly, for example, he
17 might take and add more California names and subtract some of
18 the New York names because it is known in the industry that
19 California donor names respond better than New York, state
20 donor names. It would be his function to make the list work
21 as effectively as it could. He has 50 percent ownership in
22 the list, so it would be to his benefit.

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1 BY MS. LERNER:

2 Q Let me ask a question about that. If you had given
3 him 100,000 names, and he had compiled a list that contained
4 200,000 names, but ultimately only used 25,000 of the ones that
5 you had given him, would you get paid for 25,000 names or for
6 100,000 names when the list started making money?

7 A I would be getting paid for the number of names that
8 he actually used. He would show me a computer verification.
9 In other cases, he has shown me computer verifications that
10 7,000 names went into this list, and 20,000 into this one, and
11 he said, "John, I can't use North Dakota. They are in too bad
12 a shape. They are too old. They are low dollar. So we didn't
13 use those, and I threw those out."

14 BY MR. J. LEVIN:

15 Q To your knowledge, did Victor Heyman provide any
16 names to Mike Cohen with respect to Truly Conservative
17 Contributors?

18 A I did not witness, or I have no proof that he did.
19 It is all hearsay.

20 BY MS. LERNER:

21 Q Where does the hearsay come from?

22 A Mike Cohen had a conversation with Victor Heyman and

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1 Ernie Halter, and at that point Heyman admitted that Halter did
2 in fact provide some names to boost the list.

3 MR. R. LEVIN: Who told you that?

4 THE WITNESS: Mike Cohen. I never talked to Victor
5 Heyman or Ernie Halter. It wasn't said to me, but said by
6 Mike.

7 BY MR. J. LEVIN:

8 Q When was this said to you?

9 A The week after I received the subpoena.

10 Q Accompanying the reasons for the modification.

11 A Yes.

12 Q Am I correct in assuming, and correct me if I am
13 wrong, in connection with the list Truly Conservative
14 Contributors, when Mays received the names, did he send them to
15 Heyman for computer coding, labeling -- Victor Heyman.

16 MS. LERNER: Let me ask the question.

17 BY MS. LERNER:

18 Q You mentioned that in a conversation with Mr. Cohen,
19 he told you that Mr. Heyman had told him that names from Ernest
20 Halter had been added to the list, as well as the other names.

21 A Yes.

22 Q Do you know if Mr. Heyman added those names on his

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1 own, or did they go through Mr. Cohen, who then said to Mr.
2 Heyman, "Please add this to the computerized list"?

3 A I do not know. I don't know his procedure.

4 Q Under the ordinary circumstances, would the names
5 for a list that were supposed to be put on a computer printout
6 come from Mr. Cohen to Mr. Heyman, and Mr. Heyman would only
7 put them on the computer, or would he have other people who were
8 also sending him names, and they would all end up on one big
9 list?

10 A I really can't answer. To my knowledge, or the way
11 I understand the procedure worked would be that Mike Cohen
12 would gather from several sources source material which would
13 be taken to Heyman, and then the list would be created at that
14 point.

15 Q You don't know in this particular instance whether
16 had gotten the names from Mr. Halter, and then sent them on to
17 him, or whether Heyman got them himself?

18 A No, I don't know.

19 BY MR. J. LEVIN:

20 Q Going back a bit, when you and Mr. Mays were com-
21 piling the names that became Truly Conservative Donors, of
22 those parts of the work that Mr. Mays did that you did not

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1 review, did Mr. Mays make any representations to you as to the
2 source of these names?

3 A Yes, always.

4 Q What were those representations?

5 A That they were acquired from the state agencies
6 where I had told him that they were available to be acquired
7 from. He usually showed me before they were boxed up, and he
8 made mistakes from time to time, but he usually showed me what
9 he had in each box and how he had marked them, whether they
10 were liberal Democrats, or whatever.

11 Q Did you catch those mistakes?

12 A Yes. There were a few older names that were
13 included that should not have been included, several pages were
14 blurred, and things like that. They were small mistakes.

15 MR. LEVIN: I am now handing the reporter documents
16 that are to be marked FEC Exhibit No. 4, and I am handing a
17 copy of that to respondent and counsel.

18 (The documents referred to were
19 marked FEC Exhibit No. 4 for
20 identification.)

21 BY MR. J. LEVIN:

22 Q Have you seen Exhibit 4 before? Have you seen the

8 3 0 4 0 5 5 2 0 0

1 documents in Exhibit 4 before?

2 A I did not see the letter, but I was told of the
3 results.

4 Q What do you mean, you were told of the results?

5 A Tom Mays, after he received the letter, told me of
6 the content of the letter, but I did not see it. He had got a
7 hold of it.

8 Q If you can answer these questions, I refer you to
9 paragraph 4, with respect to the reference to "earlier names,"
10 what is that a reference to, if you can answer?

11 MR. R. LEVIN: You are asking for his understanding
12 of it.

13 MR. J. LEVIN: Exactly.

14 THE WITNESS: I am reading this letter in front of me,
15 and I would say that he is saying that his earlier names happen
16 to be better than his later names. I don't know what time frame
17 he is talking about, so I couldn't begin to answer that.

18 BY MR. J. LEVIN:

19 Q Are these names that Mr. Mays compiled?

20 A I don't know.

21 Q Do you know if these are names that you compiled?

22 A I don't know. He is mentioning the particular names

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1 up here, and I did compile civil rights, committed liberals, and
2 solid, or I helped to compile them. I am not sure what he is
3 talking about.

4 Q One more question. What is a "nixie"?

5 A A nixie is a bad address, moved, not forwardable,
6 deceased, unable to deliver, addressee unknown.

7 Q Whose obligation is it to clean up those nixies?

8 A The manager.

9 Q Mr. Cohen?

10 A The manager usually works out some agreement with the
11 owner, and owner income will be taken. He will not pay the
12 owner for particular orders in order to cover the cost of the
13 cleaning.

14 Q Do you recall any agreement being worked out with
15 respect to the nixies referred to in this letter?

16 A Mr. Cohen would have to --

17 MR. R. LEVIN: The answer is yes or no, do you recall?

18 THE WITNESS: No, I don't.

19 MR. J. LEVIN: I am handing the reporter documents to
20 be marked as FEC Exhibit No. 5, and I am handing the documents
21 in FEC Exhibit No. 5 to respondent and counsel.

22 ---

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1 (The documents referred to were
2 marked FEC Exhibit No. 5 for
3 identification.)

4 BY MR. J. LEVIN:

5 Q Have you seen the documents in Exhibit No. 5 before?

6 A Yes.

7 Q When did you see those?

8 A Tom Mays was living at my apartment, so Tom would have,
9 when he received them, shown them to me.

10 Q Can you identify these documents, what they are?

11 A They are a form generated by Working Names as to the
12 breakdown in payments for various lists.

13 Q These are payments owed by Working Names to Tom Mays?

14 A Right.

15 Q I am referring now to the third, fourth, fifth, and
16 sixth pages of the Exhibit No. 5.

17 A Yes.

18 Q At the top, why at this point in 1984 are you being
19 billed as opposed to Tom Mays -- Why are you being given a
20 payment advice as opposed to Tom Mays?

21 A At that time I had written Tom a check for the car,
22 and I was taking all of the income that was derived until the

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1 \$5,000-plus was paid back.

2 Q When did you tell Meyer Cohen or anyone at Working
3 Names that this was the procedure to be followed?

4 A I have no knowledge as to the exact date, but I would
5 say that it was probably several weeks after I had written the
6 check for Tom's car.

7 Q Are we referring to the check in FEC Exhibit No. 2 on
8 page 2 of that exhibit, written on February 11, 1984?

9 A Yes.

10 Q I am going to refer you to FEC Exhibit No. 3, if you
11 would take a look at it, I am going to ask you questions with
12 reference to it.

13 A Yes.

14 Q You have just stated that the payments were made to
15 you after the check for the car, dated February 11, 1984,
16 appearing on Exhibit No. 2. On Exhibit No. 3 there are payment
17 advices sent to you in early 1983. List rental order, excuse
18 me.

19 Why was this mailed to you prior to that car
20 transaction, rather than to Thomas Mays?

21 A At the time -- I do not know why this was done.
22 This was Mike's deal. These were not mailed out. These

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1 statements are not mailed. These statements would come when
2 the bill was paid. He would give you a formal statement when
3 the bill was paid. The check probably would have been six to
4 eight months later, and I would have seen this, or Tom would
5 have seen this. In other words, these are Cohen's internal
6 documents, and I would not have known.

7 Mike explained to me when I asked him why it was in
8 my name, it was because all the lists had been in my name
9 previous to Tom coming into the picture, and the bookkeeper had
10 kept the account set up in my name. That is how Mike explained
11 it to me.

12 Q I am going to refer you back to FEC Exhibit No. 5,
13 the first two pages, the payment advices are addressed to Tom
14 Mays. Why would they have switched back to Tom Mays? In
15 other words, the list rental orders being sent to John Whitehead
16 and the payment advices for November 29 and December 19, 1983,
17 referring to Tom Mays.

18 A The check was sent out to Tom Mays at that address,
19 and it was returned because Tom's name was not on the mailbox.
20 At that point, that is what Mike told me, that the bookkeeper
21 had changed it to Tom Mays, and the check had been returned
22 because he was not living in the building, his name was not on

Q 8040575205

1 the mailbox. At that point, Mike told me that the bookkeeper
2 changed it.

3 BY MS. LERNER:

4 Q I think we are confusing two different things. On
5 Exhibit 3 is an internal document of Working Names, they are
6 listing your name as the person who owns the names.

7 A And they should not have.

8 Q Because at that time Mr. Mays was dealing with those
9 names.

10 A Right.

11 Q Exhibit 5, which is a payment advice statement sent
12 out after Exhibit 3 -- Exhibit 3 is in February, and this
13 Exhibit 5 is in November -- the name being used there is Thomas
14 Mays.

15 A I don't know why they switched back and forth. I
16 don't know why Mike Cohen's bookkeeper did that. When I
17 received the check for the full amount, like I said, I would
18 then write Tom a check for one half of it. I paid taxes on it.
19 At the time, when it was sent to me, if the check was sent to me
20 in my name fully, I would then write a check out to Tom, which
21 you see some of these examples here, for one half.

22 BY MR. J. LEVIN:

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1 Q One more question on Exhibit No. 5. You will notice,
2 at the bottom of the first sheet in Exhibit No. 5, the third
3 sheet in Exhibit No. 5, and the fifth and the sixth sheets of
4 Exhibit No. 5 there are references to the legal fees for a case
5 with the Federal Election Commission.

6 MR. R. LEVIN: I don't see that. I see legal fees.

7 MR. J. LEVIN: On the fifth and the sixth sheets, the
8 first sheet merely refers to legal fees.

9 BY MR. J. LEVIN:

10 Q Why were they deducting a portion of the payment for
11 the legal fees?

12 A At that time, they had switched and they were sending
13 all the checks to me in my name. Therefore --

14 MR. R. LEVIN: Listen to the question. The question
15 is, why were they charging you for the legal fees in a case that
16 they had before the FEC?

17 THE WITNESS: I do not know.

18 BY MR. J. LEVIN:

19 Q Was Mr. Mays still living at the same residence at
20 the time?

21 A Yes.

22 Q Did Mr. Mays still have any interest in the names

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1 going into the list at that time, Truly Conservative
2 Contributors, at the time that the payment advices were sent?

3 MR. R. LEVIN: There were no more names going in.

4 THE WITNESS: It was a dead list. It was a stagnant
5 list, so he would not have been providing names, no .

6 BY MS. LERNER:

7 Q At the time these payment advices were sent out, did
8 Mr. Mays have an interest in the receipts that were coming in
9 from the names that had been placed in the Truly Conservative
10 list?

11 A Yes. He would have had one half-interest, or one-half
12 of one-fourth.

13 BY MR. J. LEVIN:

14 Q Who held the other interest in that?

15 A Mike Cohen and Richard Heyman.

16 Q Do you have anything to add on the reason that you
17 have as far as believing Ernest Halter had involvement in the
18 Truly Conservatives List?

19 A I know of Mr. Halter's reputation in the industry.

20 BY MS. LERNER:

21 Q What is that?

22 A He is known as a wheeler-dealer operator, and he

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1 specializes in using computers to match various records to
2 eliminate salted names.

3 Q Would that include names that had come from the Federal
4 Election Commission reports, by reputation, I am asking you?

5 A By reputation, I have heard that. I have never had
6 a conversation with him to that effect.

7 BY MR. J. LEVIN:

8 Q From whom have you heard that information?

9 A Other people in the industry.

10 Q Anyone specifically?

11 A Mike Cohen.

12 Q Anyone not involved in this matter?

13 A Yes, but again, it was pure speculation.

14 Q Who was that?

15 A John Hvasta.

16 Q Anyone else?

17 A People I work with at the office.

18 Q At List America?

19 A Yes.

20 Q What does John Hvasta do, is he a list broker, or a
21 list compiler, or a list owner?

22 A He is a list owner.

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1 MR. J. LEVIN: Counsel, I have no further questions
2 at this time.

3 EXAMINATION BY COUNSEL FOR RESPONDENT

4 BY MR. R. LEVIN:

5 Q Mr. Whitehead, did you go to the offices of the
6 Federal Election Commission at any time and obtained copies of
7 lists of donors which were filed by NCPAC?

8 A No.

9 Q Did you ever instruct anyone to do that?

10 A No.

11 Q To your knowledge, did Mr. Mays do that?

12 A No, never.

13 Q As one who is familiar with the industry, would you
14 recognize the NCPAC donor list?

15 A Definitely.

16 Q Did you ever see in any -- In the matter that we are
17 here for this morning, did you ever see copies of NCPAC names?

18 A Yes.

19 Q In connection with this matter?

20 A No, but I have seen NCPAC names. In this matter, no.

21 Q Did you ever instruct Mr. Mays how to spot NCPAC
22 names, or names of other well-known fund raising organizations?

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1 A Yes.

2 Q Did that include how to spot a NCPAC list?

3 A Correct.

4 Q What instructions, if any, did you give him in connec-
5 tion with dealing with such lists, including NCPAC?

6 A When he was first trained, I took him down to the FEC,
7 showed him what the Republican Committee filed. I gave him a
8 list, basically, of the Federal PACs, and I gave him a lesson as
9 to the separation of the Federal and the State, and I also gave
10 him a file of various states in which it is illegal to obtain
11 state files to use for these purposes, such as Iowa, and so
12 forth.

13 So I gave him, I guess, a pretty thorough background
14 as to what names to avoid. I worked with Wyatt Stewart in
15 setting up a particular file at one time for the Republican
16 Congressional Campaign Committee, and I know, if there was any
17 possibility of wanting to make a fast dollar or something like
18 that, going down and getting NCPAC names and Republican
19 Committee names, I would tell anybody to stay away from those
20 particular reports.

21 I know those people. I work for those people. I deal
22 with those people on the phone almost every day. That is not

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1 the way to compile a mailing list. You are going to get caught
2 and you are going to get caught real fast.

3 Q Mr. Whitehead, to your knowledge, subsequent to the
4 filing by NCPAC of a complaint about misuse of its names in
5 this case, did NCPAC continue to rent this list?

6 A Most definitely.

7 MS. LERNER: I am sorry, but did you mean NCPAC?

8 MR. R. LEVIN: Yes, I meant NCPAC. They have
9 continued to be renters of this list.

10 MS. LERNER: They were renting. I was thinking that
11 they were renting it to other people.

12 BY MR. LEVIN:

13 Q And the list is Truly Conservative; is that right?

14 A Yes.

15 Q How long have you been in the business?

16 A Since 1966.

17 Q In those 20-some years, have you ever been named as
18 a respondent in any proceeding before the Federal Election
19 Commission?

20 A No.

21 Q Have you ever been named as a respondent before any
22 agency tasked with the responsibility of enforcing statutes

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1 BY MS. LERNER:

2 Q Let me clarify something. You indicated that for
3 someone who is in the business, it was easy to recognize a
4 NCPAC report; is that right?

5 A Yes.

6 Q I believe you testified that when you sent names to
7 Meyer Cohen, what you sent him were copies of the pages from
8 the reports that you had obtained from the various sectors of
9 the state.

10 A Yes.

11 Q Would it be correct, then, to say that Mr. Cohen would
12 have been able to recognize a NCPAC report in those papers as
13 well?

14 MR. R. LEVIN: Objection. I don't think you can ask
15 him what would somebody else recognize.

16 THE WITNESS: I don't know.

17 BY MS. LERNER:

18 Q Do you know how long Mr. Cohen has been in this
19 business?

20 A To my knowledge, I recall him being in the business
21 from, say, at least 1975. Basically, Mike Cohen started out
22 not in the Republican or Conservative fund raising field, which

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1 I was in, but in the United Negro College Fund. His major
2 client is the NAACP, and the United Negro College Fund. Those
3 are his two big clients right now.

4 I had always known of Mike Cohen in that capacity, but
5 not in the capacity of the Conservative and Republican fund
6 raiser. It is more lucrative to be in the Republican and
7 Conservative field, and that is why he switched over, I am sure.

8 BY MR. J. LEVIN:

9 Q Pertaining to your discussion of Ernest Halter, do
10 you have any reason to believe that Ernest Halter did business
11 with Victor Heyman in dealing with the names on the Truly
12 Conservative Contributors?

13 A Other than what Mike Cohen told me, no. Mike Cohen
14 told me that both Ernie Halter and Victor Heyman, both verified
15 that Halter had supplied names for all of the Conservative lists.

16 Q Did Heyman obtain names on his own, or do you have any
17 reason to believe that?

18 A I have no knowledge of that. I can't say he did. I
19 know he was hungry for names. He called me many, many times,
20 and he would say, "We have sales of X number," and he talked
21 with Tom several times, and he said, "I have to have more names.
22 I have to have more names." I said, "I'm too busy, and Tom

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1 doesn't have the money to do it.

2 Q Let me clarify this. There may be some reason to
3 believe on your part that Halter would have or may have obtained
4 names which Heyman then put on the computer, generating the
5 labels, which was his function.

6 A It would have been the fastest way for someone hungry
7 for names to obtain them.

8 Q So this is something you have reason to believe
9 occurred.

10 A But I have no knowledge of it.

11 BY MS. LERNER:

12 Q The hierarchy here seems to be, there are people out
13 there who compile lists, they send their lists to someone like
14 Mr. Cohen -- is he the broker, is that what he would be called?

15 A The manager and broker, I think, but primarily the
16 manager.

17 Q He then takes the raw data that everybody provides
18 him and sends it to a computer programming house, to put this
19 together, and then he markets the list.

20 A Yes.

21 Q In the ordinary situation, would the computer house
22 be involved in going out and obtaining names to add to these

3 8 0 4 0 3 7 5 2 1 6

1 lists, who would they receive them from the manager/broker?

2 A In most cases, no, but in most cases, the computer
3 house would not be involved in ownership of the list. The
4 ownership -- Heyman's ownership in this particular list came
5 from the standpoint that Mike Cohen did not want to put up the
6 money, or did not have the money to pay for keypunching services.
7 Heyman, his part of the partnership was to provide keypunching
8 services to get the list ready to be rented.

9 In a normal situation, you would not have a computer
10 house involved in other than just running your labels and
11 shipping them out. This was an unusual case because Heyman is
12 also the cousin of Harriet Heyman who is Mike Cohen's fiance.

13 MR. LEVIN: I have nothing further.

14 THE WITNESS: May I say something?

15 MR. R. LEVIN: If you want to say something, go ahead.

16 THE WITNESS: I have built a reputation on getting a
17 lot of good names and making a lot of money for other people and
18 for myself in the list industry. I have had lots of offers to
19 take part in some list deals which I totally rejected, knowing
20 that a lot of money could be made, because I was very leary of
21 the source. That is how I first encountered Ernie Halter in
22 this business. He was peddling a million donor names, supposedly,

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1 at one time. Someone said, "I know someone who has a million
2 donor names." He got in touch with me through someone else, and
3 I took one look at it and I said, "I wouldn't touch it."

4 He said, "Give me some leads on who would be interested
5 in buying these names," and I said, "I would suggest no one,
6 absolutely no one that I know that would buy these names."

7 BY MR. J. LEVIN:

8 Q Was it your concern that these names would have been
9 obtained contrary to FEC statutes?

10 A Most definitely, yes.

11 MR. J. LEVIN: We will be sending you your witness
12 check. This deposition is adjourned, not officially dismissed.
13 Thank you very much.

14 MR. R. LEVIN: We will waive signature.

15 (Whereupon, at 11:45 a.m., the taking of the
16 deposition ceased.)

17 (Signature was waived.)
18
19
20
21
22

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CERTIFICATE OF REPORTER/NOTARY PUBLIC

1
2 I, Patricia Anne Minson, a Notary Public in and for
3 the District of Columbia, before whom the foregoing deposition
4 was taken, do hereby certify that the witness whose testimony
5 appears in the foregoing deposition was duly sworn by me; that
6 the testimony of said witness was taken by me hereof and there-
7 after reduced by typewriter under my supervision; that said
8 deposition is a true and accurate record of the testimony given
9 by said witness; that I am neither counsel for, related to, nor
10 employed by any of the parties to the action in which this
11 deposition was taken; and, further, that I am not a relative or
12 employee of any counsel or attorney employed by the parties
13 hereto, nor financial or otherwise interested in the outcome of
14 this action.
15

16 

17 Patricia Anne Minson

18 My commission expires: March 14, 1990.
19
20
21
22

88040575219

WORKING NAMES, INC.

447A East-West Highway
Bethesda, Maryland 20814

98
FULFILLMENT INSTRUCTION ORDER

DATE: 02/08/84 WN ORDER NO.: 402-021

BROKERS NUMBER: 21

MAILER: AMERICAN BIBLE SOCIETY OFFER: APPEAL

PLEASE NOTIFY WORKING NAMES IN ADVANCE OF FULFILLMENT OF ANY VARIATIONS, CHANGES, OR ADDITIONAL COSTS NOT REFLECTED ON THIS ORDER.

HEYMAN CONSULTING GROUP
1706 LORRE DRIVE
ROCKVILLE, MD 20852
ATTN: VICTOR HEYMAN

FURNISH NAMES ON: Magnetic Tape 9TK 1600 LPI
Supply Dump & Layout

SHIP BY: 02/20/84

MUST BE RECEIVED BY: 02/22/84

FOR MAILING ON: 04/25/84

SHIP VIA:

SHIP TO: AMERICAN BIBLE SOCIETY
1706 LORRE DRIVE
ROCKVILLE, MD 20852

- LIST
- Please address a representative cross section of the entire list.
 - Please address an "Nth" name selection of the entire list.
 - Please address as indicated below.
 - Using the enclosed form, please send WN a State count of names supplied.
 - Please omit names previously used on:

KEEP A RECORD OF NAMES SUPPLIED TO AVOID DUPLICATION ON FUTURE ORDERS. Address USA names only - Omit Military, Hawaii, Alaska, Puerto Rico, Virgin Is., Canada & Foreign unless specified. PLEASE USE SHIPPING LABELS ENCLOSED WHEN SHIPPING ADDRESSED MATERIAL. Fill in and return postal card enclosed upon completion of this order. ALL NAMES MUST BE IN ZIP CODE NUMERICAL SEQUENCE... Maintain correct sequence of list when packing for shipment. PLEASE NUMBER CARTONS ACCORDINGLY. Mailer name, order number, key, list name and quantity to appear on all packages.

In accepting this order, it is acknowledged that WN is an agent of the mailer/broker/owner and is not liable for uncollected accounts.

QUANTITY LIST KEY PER M

5000 TRULY CONSERVATIVE DOXORS GE ~~12.50~~ \$10.00

**PLEASE SELECT NAMES FROM THE FOLLOWING STATES ONLY: PA; VA; WV; NC; TN; LA; MS; SD; ND; WI; KS; NE. **PLEASE KEY SHIPPING LABEL ONLY. SPECIAL ONE-TIME ONLY PRICE: \$4.00/N. SALT INITIALS: D.Q.

FOR ALL QUESTIONS ON THIS ORDER CALL

Cynthia Taylor
(301) 656-5103

[Exhibit 1] [copy]

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8

88040575221

JOHN L. WHITEHEAD
2008 COLUMBIA RD., N.W., NO. 20
WASHINGTON, D.C. 20009

108

5-6-1983 No. ~~126~~ ¹²⁶

PAY TO THE ORDER OF

Thomas L. Mays Jr. \$ 317.02
Three hundred seventeen dollars & 02/100 DOLLARS

 THE NATIONAL BANK OF WASHINGTON
WASHINGTON, D.C. 20005

MEMO

car -

John L. Whitehead

JOHN L. WHITEHEAD

1-24-1983 No.

~~126~~ ¹²⁶

Pay to the order of

Thomas Mays \$ 2000.00
two thousand dollars & 00/100 Dollars

 THE NATIONAL BANK OF WASHINGTON
Washington, D.C.

MEMO

John L. Whitehead

JOHN L. WHITEHEAD

1-22-1983 No.

~~126~~ ¹²⁶

Pay to the order of

Thomas L. Mays Jr. \$ 100.00
ONE hundred dollars & 00/100 Dollars

 THE NATIONAL BANK OF WASHINGTON
Washington, D.C.

MEMO

John L. Whitehead

FEC Exh. #2

83040575222

JOHN L. WHITEHEAD
 2008 COLUMBIA ROAD, N.W., NO. 20
 WASHINGTON, D.C. 20009

1359

6-22-84

15-3
840 E

PAY TO THE ORDER OF Thomas L. Mays Jr. \$ 1000.00
One Thousand Dollars & 00/100

THE RIGGS NATIONAL BANK
 of WASHINGTON, D.C.
 UNIVERSAL OFFICE
 CONNECTICUT AVENUE AND T STREET, N.W.

John L. Whitehead

JOHN L. WHITEHEAD
 2008 COLUMBIA RD., N.W., NO. 20
 WASHINGTON, D.C. 20009

273

2-11-1984

1576
540 B

PAY TO THE ORDER OF Ray Burnette Vol Kourgen \$ 5077.00
five thousand seventy seven & 00/100

THE NATIONAL BANK
 OF WASHINGTON
 WASHINGTON, D.C. 20009

John L. Whitehead

JOHN L. WHITEHEAD
 2008 COLUMBIA RD., N.W., NO. 20
 WASHINGTON, D.C. 20009

165

7-18-1983

1576
540 B

PAY TO THE ORDER OF Thomas L. Mays Jr. \$ 643.00
Six hundred forty three & 00/100 DOLLAR:

THE NATIONAL BANK
 OF WASHINGTON
 WASHINGTON, D.C. 20009

John L. Whitehead

297242

JOHN L. WHITEHEAD
2008 COLUMBIA RD., N.W., NO. 20
WASHINGTON, D.C. 20008

266
12-1-19 83 126

PAY TO THE ORDER OF Thomas L. Map Jr. \$ 100.00
one hundred dollars & 00/100 DOLLARS

 THE NATIONAL BANK OF WASHINGTON
WASHINGTON, D.C. 20008

John L. Whitehead

JOHN L. WHITEHEAD
2008 COLUMBIA ROAD, NW., NO: 20
WASHINGTON, D.C. 20008

1244
2-4-83 126

PAY TO THE ORDER OF Thomas L. Map Jr. \$ 430.00
four hundred thirty dollars & 00/100 DOLLARS

 THE RIGGS NATIONAL BANK
of WASHINGTON, D.C.
UNIVERSAL OFFICE
CONNECTICUT AVENUE AND T STREET, N. W.

John L. Whitehead

JOHN L. WHITEHEAD
2008 COLUMBIA ROAD, NW., NO. 20
WASHINGTON, D.C. 20008

1479
12-11-84 15-3 8408

PAY TO THE ORDER OF Thomas L. Map Jr. \$ 500.00
five hundred dollars & 00/100 DOLLARS

 THE RIGGS NATIONAL BANK
of WASHINGTON, D.C.
UNIVERSAL OFFICE
CONNECTICUT AVENUE AND T STREET, N. W.

John L. Whitehead

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539

JOHN L. WHITEHEAD
2006 COLUMBIA RD., N.W., NO. 20
WASHINGTON, D.C. 20008

5-14 1984 ¹²⁷/₁₀₀

PAY TO THE ORDER OF Thomas L. Mays Jr. \$ 800.00
Eight hundred dollars 00/100 DOLLAR

 THE NATIONAL BANK OF WASHINGTON
UNIVERSAL OFFICE WASHINGTON, D.C. 20007

John L. Whitehead

1410

JOHN L. WHITEHEAD
2006 COLUMBIA ROAD, NW., NO. 20
WASHINGTON, D.C. 20008

10/21 84 ¹⁵/₁₀₀

PAY TO THE ORDER OF Thomas L. Mays \$ 1000.00
One thousand dollars 00/100 DOLLAR

The RIGGS NATIONAL BANK
of WASHINGTON, D.C.
UNIVERSAL OFFICE
CONNECTICUT AVENUE AND T STREET, N. W.

John L. Whitehead

1283

JOHN L. WHITEHEAD
2006 COLUMBIA ROAD, NW., NO. 20
WASHINGTON, D.C. 20008

5-24 83 ¹⁵/₁₀₀

PAY TO THE ORDER OF Thomas L. Mays Jr. \$ 440.00
four hundred forty dollars 00/100 DOLLAR

The RIGGS NATIONAL BANK
of WASHINGTON, D.C.
UNIVERSAL OFFICE
CONNECTICUT AVENUE AND T STREET, N. W.

John L. Whitehead

88040575225

JOHN L. WHITEHEAD
2008 COLUMBIA ROAD, NW., NO. 20
WASHINGTON, D.C. 20008

995

3-17-83

Pay to the order of Thomas L. Mays \$ 2000.00
Two thousand dollars & 00/100

The RIGGS NATIONAL BANK
of WASHINGTON, D.C.
UNIVERSAL OFFICE
CONNECTICUT AVENUE AND T STREET, N. W.

John L. Whitehead

JOHN L. WHITEHEAD
2008 COLUMBIA ROAD, NW., NO. 20
WASHINGTON, D.C. 20008

998

5-11-83

Pay to the order of Thomas L. Mays Jr. \$ 50.35/k
Fifty dollars & 35/100

The RIGGS NATIONAL BANK
of WASHINGTON, D.C.
UNIVERSAL OFFICE
CONNECTICUT AVENUE AND T STREET, N. W.

John L. Whitehead

JOHN L. WHITEHEAD
2008 COLUMBIA ROAD, NW., NO. 20
WASHINGTON, D.C. 20008

1376

6-7-84

Pay to the order of Thomas L. Mays Jr. \$ 700.00
Seven hundred dollars & 00/100

The RIGGS NATIONAL BANK
of WASHINGTON, D.C.
UNIVERSAL OFFICE
CONNECTICUT AVENUE AND T STREET, N. W.

John L. Whitehead

NAME John L. Whitehead # 297292 099
 \$ 15 19 84 N $\frac{15-7}{340}$
 PAY TO THE ORDER OF Thomas L. Mays Jr. \$ 3000.00
three thousand 00/100 DOLLARS
 THE NATIONAL BANK OF WASHINGTON
 WASHINGTON, D.C. 20008
 John L. Whitehead

JOHN L. WHITEHEAD 280
 2006 COLUMBIA RD., N.W., NO. 20
 WASHINGTON, D.C. 20009
 April 30 19 83 $\frac{15-7}{340} 6$
 PAY TO THE ORDER OF Thomas L. Mays Jr. \$ 550.00
five hundred fifty 00/100 DOLLARS
 THE NATIONAL BANK OF WASHINGTON
 WASHINGTON, D.C. 20008
 John L. Whitehead

JOHN L. WHITEHEAD 1459
 2006 COLUMBIA ROAD, NW., NO. 20
 WASHINGTON, D.C. 20009
 9-13-84 $\frac{15-3}{340} 8$
 PAY TO THE ORDER OF Thomas Mays Jr. \$ 515.00
five hundred fifteen 00/100 DOLLARS
 The RIGGS NATIONAL BANK
 of WASHINGTON, D.C.
 UNIVERSAL OFFICE
 CONNECTICUT AVENUE AND T STREET, N. W.
 John Whitehead

83040675226

UNITED STATES GOVERNMENT
FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D.C. 20535



(301) (301) 688-6108

Ⓟ 2/26/83

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C. 20009

A/P - LIST RENTAL ORDER 301-050

Date 1/31/83

Mailer: RNC

Maildate: 2/28/83

5,100 TRULY @ \$12.50/M Commission \$ 63.75

Less 2,500 names @ 1.5¢/each for
initial keypunching costs to
Heyman Consulting Group

(37.50)

TOTAL DUE THIS INVOICE

\$ 26.25

88040675227

RECEIVED APR 22 1983

FEC Exh. #3



(301) (301) 626-5100

Ⓜ 1/31/83

John Whitehead
2006 Columbia Road, Apt. 20
Washington D.C. 20009

A/P- LIST RENTAL ORDER #301-043

Date 1/24/83

Mailer: Covenant House Maildate: 4/4/83

5,100 Truly @ \$12.50/M Commission \$ 63.75

Less 2,500 names @ 1.5¢/each for
initial keypunching costs to
Heyman Consulting Group (37.50)

TOTAL DUE THIS INVOICE. \$ 26.25

83040375228

RECEIVED MAR 15 1983



(301) (301) 688-5103

① 1/18/83

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C.

A/P - LIST RENTAL ORDER 301-005

Date 1/4/83
Mailer: American Printing House f/t Blind
Maildate: 2/14/83

10,200 TRULY @ \$12.50/M Commission	\$ 127.50
Less 5,000 names @ 1.5¢/each for initial keypunching costs to Heyman Consulting Group	(<u>75.00</u>)
TOTAL COMMISSION DUE.	\$ 52.50

8 8 0 4 0 6 7 5 2 2 9

RECEIVED APR 4 1983



(201) (201) 000-4100

1/18/83

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C.

A/P - LIST RENTAL ORDER 301-014

Date 1/7/83

Mailer: St. Labre

Maildate: 3/14/83

5,140 TRULY @ \$12.50/M Commission \$ 64.25

Less 2,500 names @ 1.5¢/each for
initial keypunching costs to
Heyman Consulting Group (37.50)

TOTAL COMMISSION DUE. \$ 26.75

83040875230

RECEIVED APR 1 1 1983



(301) (301) 688-6100

② 1/31/83

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C. 20009

A/P - LIST RENTAL ORDER 301-034

Date 1/19/83

Mailer: Project Hopes Maildate: 3/21/83

5/M Truly @ \$12.50/M Commission \$ 62.50

Less 2,500 names @ 1.5¢/each for
initial keypunching costs to
Heyman Consulting Group (37.50)

TOTAL COMMISSION DUE. \$ 25.00

38040675231

RECEIVED APR 1 1 1983



24

(301) (301) 688-5100

Ⓟ 2/26/83

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C. 20009

A/P - LIST RENTAL ORDER 301-050

Date 1/31/83

Mailer: RNC

Maildate: 2/28/83

5,100 TRULY @ \$12.50/M Commission \$ 63.75

Less 2,500 names @ 1.5¢/each for
initial keypunching costs to
Heyman Consulting Group

(37.50)

TOTAL DUE THIS INVOICE

\$ 26.25

880403752329

RECEIVED APR 22 1983



(201) (201) 688-6108

② 3/11/83

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C. 20009

A/P - LIST RENTAL ORDER 302-027

Date 2/18/83

Mailer: Am. Family Assoc. Maildate: 4/11/83

5/M TRULY @ \$12.50/M Commission \$ 62.50

Less 2,500 names @ 1.5¢/each for
initial keypunching costs to
Heyman Consulting Group (37.50)

TOTAL DUE THIS INVOICE. \$ 25.00

88040675233



(301) (301) 622-5100

② 3/11/83

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C. 20009

A/P - LIST RENTAL ORDER 302-045

Date 2/24/83
Mailer: Moral Majority Maildate: 3/6/83

5/M TRULY @ \$12.50/M Commission	\$ 62.50
Less:	
2,500 names @ 1.5¢/each for initial keypunching costs to Heyman Consulting Group	(37.50)
TOTAL DUE THIS INVOICE.	\$ 25.00

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RECEIVED APR 28 1983



(301) (301) 000-0100

④ January 18, 1983

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C.

A/P - LIST RENTAL ORDER 212-031

Date 12/21/82
Mailer: USO

Maildate: 1/10/83

5,241 TRULY @ \$12.50/M Commission \$ 65.51

Less 2,500 names @ 1.50²⁴ each for
initial keypunching costs to
Heyman Consulting Group (37.50)

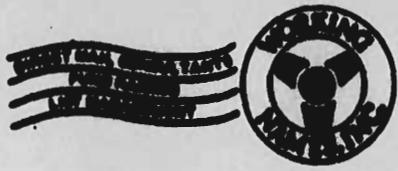
TOTAL COMMISSION DUE. \$ 28.01

CM/CORRECT COSTS - 5/31/83 < 12.50 >
\$ 15.51

88040675235

pd. \$367.50
Ch. #3268 8/15/83

RECEIVED MAY 12 1983



(301) (301) 000-0100

Ⓟ 2/26/83

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C. 20009

A/P - LIST RENTAL ORDER 301-046

Date 1/27/83
Mailer: NRTW-LDF Maildate: 3/21/83

5,100 TRULY @ \$12.50/M Commission \$ 63.75
Less 2,500 names @ 1.50^{2¢} each for
initial keypunching costs to
Heyman Consulting Group (37.50)

TOTAL DUE THIS INVOICE. \$ 26.25

CMH/CONCEPT CHGS - 5/31/83 < 12.50 >
\$ 13.75

RECEIVED JUN 23 1983

\$ 367.50
8/15/83 ck # 8268

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(301) (301) 688-6188

① 3/11/83

John Whitehead
2006 Columbia Rd., Apt. 20
Washington, D.C. 20009

A/P - LIST RENTAL ORDER 302-018

Date 2/8/83

Mailer: POW-MIA

Maildate: 3/21/83

5,100 TRULY @ \$12.50/M Commission \$ 63.75

Less 2,500 names @ 1.5¢^{2¢} each for
initial keypunching costs to
Heyman Consulting Group (37.50)

TOTAL DUE THIS INVOICE. \$ 26.25

DEM/ correct rates - 5/31/83 < 12.50 >
\$ 13.75

PO # 30750
OI # 3268 8/15/83

RECEIVED MAR 23 1983

88040's / 5237



(301) (301) 622-6100

Ⓟ 2/26/83

John Whitehead
2006 Columbia Road, Apt 20
Washington, D.C. 20009

A/P - LIST RENTAL ORDER 302-019

Date 2/8/83

Mailer: 3/28/83

Maildate: 3/28/83

5/M TRULY @ \$12.50/M Commission \$ 62.50

Less 2,500 names @ 1.50^{2x} each for
initial keypunching costs to
Heyman Consulting Group (37.50)

TOTAL DUE THIS INVOICE. \$ 25.00

CRN/Correct charges -
5/31/83 <12.50>
\$12.50

RECEIVED JUN 7 1983

pd. \$367.50 Ch. #3268
8/15/83

88040675238



(301) (301) 688-6100

Ⓟ 03/31/83

John Whitehead
2006 Columbia Road, Apt. 20
Washington, D.C. 20009

A/P - LIST RENTAL ORDER #303-026

Date: 3/17/83

Mailer: Mem.Sloan-Kettering

Maildate: 5 /16/83

5,100 TRULY @ \$12.50/M Commission

\$ 63.75

TOTAL DUE THIS INVOICE. \$ 63.75

RECEIVED JUN 24 1983

RECEIVED JUN 24 1983

Ⓟ \$367.50
Ch# 3068
8/15/83

88040675239

WORKING NAMES, INC.

11600 Bolling Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



100

June 21, 1984

Victor Heyman
Tom Mays, Jr.
1706 Lorre Drive
Rockville, MD 20852

Dear Victor and Tom:

I had a very long working session with one of our bigger broker clients and went over every list usage on TRULY, NICE, SOLID, MATCHED MULTI, COMMITTED LIBERALS and CIVIL RIGHTS \$25+ lists.

The results of the usage are mixed ranging from very good to bad (if not horrible).

The future usage therefore was the thrust of our conversation.

In most respects the earlier names out perform the later names. We will therefore, for the first time, begin filling orders with the earlier names.

To get the later names to become more productive we suggest cleaning (ACR, not Data Bank) the whole list.

I can structure the following deal at these guessed-at costs:

Mailer to receive full runs of NICE, TRULY, SOLID. The 3 separate runs in zip sequence on mag tape. More specific instructions will be issued.

Mailer will absorb the costs of the first 2-3% of nixies.

Your partnership will pay the balance of the nixies.

Nixies cost \$.25 per envelope.

The partnership will bear the costs of key-punching and updating.

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FEC Exh. #4

Victor Heyman
Tom Mays, Jr.
June 21, 1984
Page Two

Costs - based on 200,000 universe:

12-13% nixies rate	=	26,000 pieces
we pay on 10%	=	20,800 pieces
at \$.25/each	=	\$5,200.00

Keying 26,000 nixies and removing/updating addresses @\$25/M		<u>650.00</u>
		\$5,850.00

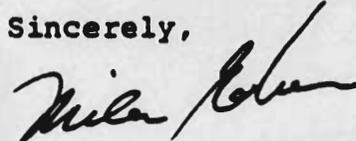
This breaks down to a guessed cost to each half of the partnership of approximately \$2,925.00.

Tom, your half of the partnership owes Victor's approximately \$3,750.00 for the keypunching costs from 150,000 to the current level.

If you both approve, I will start putting the machinery in motion. In order to get the deal we would have to move fast, so that it can be done by 1985 testings.

Please let me know.

Sincerely,



Mike Cohen

33040675241

WORKING NAMES, INC.

11800 Bolling Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



131



November 29, 1983

Tom Mays, Jr.
2006 Columbia Road, N.W.
Apt. #20
Washington, D.C. 20009

Sample.

A/P - PAYMENT ADVICE

Check #3576
\$400.40
Payable to: Tom Mays, Jr.

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<u>LIST RENTAL ORDER #</u>	<u>AMOUNT DUE</u>
302-004	\$ 26.18
303-013	14.75
303-015	47.63
304-024	150.38
304-030	32.15
305-009	112.50
305-013	12.88
305-018	13.49
305-021	7.22
305-024	18.51
306-004	63.09
306-008	64.31
307-059	18.26
310-028	76.53
310-061	90.97
311-035	76.89
TOTAL:	\$ 825.74

LESS: 1/3 Legal Fees Paid
to Kaswell, Perazich & Watson, P.C.
Check #3562

- 425.34
BALANCE DUE \$ 400.40

FEC Exh #5

WORKING NAMES, INC.

11600 Bolling Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



13



December 19, 1983

Tom Mays, Jr.
2006 Columbia Road, N.W.
Apt. #20
Washington, D.C. 20009

A/P - PAYMENT ADVICE

Check #3624
Amount: \$1,029.33
Payable To: Tom Mays, Jr.

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LIST RENTAL ORDER#

AMOUNT DUE

305-029 ✓	\$ 346.50
306-020 ✓	60.08
306-021 ✓	58.29
306-029 ✓	58.21
306-036 ✓	506.25

TOTAL DUE \$ 1,029.33

WORKING NAMES, INC.

11600 Bolling-Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



June 28, 1984

John Whitehead
2006 Columbia Road, N.W.
Apt. #20
Washington, D.C. 20009

A/P - PAYMENT ADVICE

Check #4281
Amount: \$2,047.84

88040575244

<u>LRO#</u>	<u>AMOUNT</u>
308-016	\$ 57.37
308-108	64.06
308-109	62.50
308-113	63.61
308-124	127.50
309-001	544.73
309-004	63.75
309-009	63.92
309-017	443.11
309-021	63.87
309-031	126.58
309-038	531.37
309-041	64.43
309-042	64.41
309-043	131.25
309-049	58.60
309-070	63.75
310-002	131.25
310-004	63.78
TOTAL.....	\$2,789.84

LESS: LEGAL FEES.....- 242.00*
COMPUTER CHARGES...- 500.00**

BALANCE DUE.....\$2,047.84

*1/3 of payment sent to Kaswell, Perazich & Watson on 6/12/84
(see attached) (CK#4241)

**Partial payment to Heyman Consulting Group for computer services.

WORKING NAMES, INC.

11600 Bolling Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



51

November 30, 1984

John Whitehead
2006 Columbia Road, N.W.
Apt. #20
Washington, D.C. 20009

A/P - PAYMENT ADVICE

Check #4790
Amount: \$2,152.64

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<u>LRO#</u>	<u>AMOUNT</u>
311-008	\$ 63.75
311-010	63.92
311-022	64.10
311-023	63.75
311-031	114.41
311-040	126.36
311-041	125.00
311-045	64.14
311-049	95.25
311-050	95.25
311-061	18.26
311-079	64.40
312-007	127.50
312-008	336.09
312-009	566.18
312-012	63.75
312-013	64.40
312-014	63.75
312-015	127.50
312-021	76.51
312-030	141.25
312-032	127.12
TOTAL.....	\$2,652.64
LESS: COMPUTER CHARGES	
PAID TO HEYMAN CONSULTING	
GROUP, CK#4773, 11/26/84	- 500.00
BALANCE DUE.....	\$2,152.64

WORKING NAMES, INC.

11600 Bolling Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



129

March 28, 1985

John Whitehead
2006 Columbia Road, N.W.
Apt. #20
Washington, D.C. 20009

A/P - PAYMENT ADVICE

Check #5200
Amount: \$ 2,039.03

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<u>LRO#</u>	<u>AMOUNT</u>
401-065✓	\$127.50✓
401-068	63.75
401-070✓	63.75✓
401-075✓	64.10✓
401-080✓	114.75✓
401-084✓	112.50✓
401-085✓	112.50✓
402-074✓	63.75✓
402-081	63.75
402-092	63.75
402-095	63.75
403-002	22.88
403-019	63.75
403-022✓	63.75✓
403-030✓	444.00✓
403-045✓	63.75✓
403-048✓	63.75✓
403-050✓	63.75✓
404-029✓	56.96✓
404-043✓	63.75✓
404-070✓	63.75✓
406-011	63.75
406-012	56.25
406-044	157.59
407-209✓	127.50✓
TOTAL COMMISSION DUE.....	\$2,289.03
LESS: LEGAL FEES FOR CASE WITH THE FEDERAL ELECTION COMMISSION.....	250.00
BALANCE DUE.....	\$2,039.03

WORKING NAMES, INC.

11800 Boiling Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



129

March 28, 1985

John Whitehead
2006 Columbia Road, N.W.
Apt. #20
Washington, D.C. 20009

A/P - PAYMENT ADVICE

Check #5200
Amount: \$ 2,039.03

8 8 0 4 0 5 7 5 2 4 7

<u>LRO#</u>	<u>AMOUNT</u>
401-065✓	\$127.50✓
401-068	63.75
401-070✓	63.75✓
401-075✓	64.10✓
401-080✓	114.75✓
401-084✓	112.50✓
401-085✓	112.50✓
402-074✓	63.75✓
402-081	63.75
402-092	63.75
402-095	63.75
403-002	22.88
403-019	63.75
403-022✓	63.75✓
403-030✓	444.00✓
403-045✓	63.75✓
403-048✓	63.75✓
403-050✓	63.75✓
404-029✓	56.96✓
404-043✓	63.75✓
404-070✓	63.75✓
406-011	63.75
406-012	56.25
406-044	157.59
407-209✓	127.50✓
TOTAL COMMISSION DUE.....	\$2,289.03
LESS: LEGAL FEES FOR CASE WITH THE FEDERAL ELECTION COMMISSION.....	250.00
BALANCE DUE.....	\$2,039.03

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

BY
EXECUTIVE SESSION

In the Matter of)
)
Thomas L. Mays)
Working Names, Inc.)
Meyer T. Cohen)
John L. Whitehead)
John Whitehead and Associates)

00 JUN 4 P 1: 49
MUR 1542
JUN 10 1986

GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter involves two complaints filed by the National Conservative Political Action Committee alleging violations of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. These complaints alleged that the American Printing House for the Blind and the Republican National Committee solicited contributions from a pseudonym submitted by NCPAC to the Reports Analysis Division pursuant to 2 U.S.C. § 438(a)(4). NCPAC stated further in these allegations that Working Names, Inc. and Meyer T. Cohen, an officer of Working Names, had rented the list containing the pseudonym to the solicitors.

In response to the complaint, Meyer Cohen of Working Names admitted that his company has the pseudonym, and he sent us the portion of the list containing the pseudonym. He stated that Working Names is a list management company representing two owners of the list and that the two owners compiled the list in "a legally acceptable manner." Mr. Cohen proceeded to state that the pseudonym or "decoy" submitted by NCPAC may not be a "true decoy" in that it may be obtainable from some source other than reports filed with the Commission or with Secretaries of State.

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Research of this Office revealed that the pseudonym was not the only example of a name from the list coinciding with NCPAC reports. The list portion sent to this Office by Mr. Cohen contained 212 names. After checking those names against a list of 1982 contributors to NCPAC, it appeared that approximately 14 percent of the names on the list portion submitted by Mr. Cohen also appeared on the NCPAC reports filed with the Commission for 1982.

On July 12, 1983, the Commission found reason to believe that Working Names violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. The Commission also approved interrogatories to be sent to Working Names.

In a meeting with counsel for Working Names on August 3, 1983, and in a letter received from Meyer T. Cohen, President of Working Names, on August 12, 1983, this Office was informed of other persons involved in this transaction. In response to a written interrogatory asking him to state the owners of the list, Mr. Cohen stated that the owners are Victor K. Heyman and Heyman Consulting Group, Inc. ("Heyman Consulting") of Rockville, Maryland and Thomas L. Mays of Washington, D.C. Mr. Cohen's response indicated that the functions of the participants dealing with the list were divided as follows: Working Names advertised and marketed the list and received payment from the list users. Victor Heyman and Heyman Consulting performed computer processing of the list material, entering the names which they received onto computer tapes and duplicating the tapes or producing mailing labels from the tape information. Mr. Mays obtained the names themselves. According to oral representations by counsel and

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Meyer Cohen's written response, Mr. Mays traveled to the various offices of the Secretaries of State and obtained the filings made for state and local elections and did not "knowingly" use any material required by federal law to be filed with a Secretary of State.

On October 3, 1983, this Office, with the Commission's approval, sent a letter to the complainant asking whether NCPAC had included the solicited pseudonym on any list or report other than the report of contributors submitted to the Commission. On October 18, NCPAC replied that the pseudonym "was not used by NCPAC on any report or list of names filed with any agency other than the Federal Election Commission."

On February 7, 1984, the Commission found reason to believe that Meyer Cohen and Thomas L. Mays violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. The response of counsel for the respondents included an affidavit from Mr. Mays listing the offices of the Secretaries of State in eight states as the sources of the list, "Truly Conservative Contributors."

On May 10, 1984, this Office sent questions to these eight offices inquiring as to the process by which members of the public may review or receive copies of political campaign finance reports and as to whether and how state reports are separated from federal reports. Procedures differ from state to state. All but one of the states separate state filings from federal filings. This is done by having a separate state office for the receipt of filings for state candidacies, by separate filing rooms, or by separate, clearly marked cabinets. The Florida Secretary of State's Office stated that it does not separate

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federal and state files in the above manner. It also stated that NCPAC files reports in computerized form and does not separate federal and state activity.

In response to a request from counsel, the Commission, on October 30, 1984, voted to approve entering into pre-probable cause conciliation with Mr. Mays, Mr. Cohen and Working Names, and Mr. Heyman and Heyman Consulting. After a meeting between respondents' counsel and OGC staff members, respondents' counsel sent in signed proposals which this Office received on November 30, 1984.

On January 8, 1985, the Commission voted to amend the proposals signed by the respondents and to send them back to the respondents for their consideration. On March 1, 1985, the Commission voted to accept the amended proposal that was signed by Victor K. Heyman and the Heyman Consulting Group and to close the file as to these two respondents.

On May 8, 1985, this Office sent briefs to the new counsel for Mr. Mays and Working Names and Mr. Cohen, stating that the General Counsel was prepared to recommend that the Commission find probable cause to believe that the remaining respondents violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. No reply briefs were received from counsel.

On July 23, 1985, the Commission found probable cause to believe that Thomas Mays, Working Names, Inc. and Meyer T. Cohen violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15 and voted to commence conciliation negotiations.

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This Office and counsel for the respondents were unable to reach an agreement. In early October, just prior to being informed by respondents' counsel that the respondents would not sign a modified proposal offered by this Office, the former counsel for the respondents called this Office. He is representing Heyman Consulting Group in a state court suit against Working Names for payments allegedly owed by Working Names. During the discovery process in this litigation, Working Names sent certain documents to Heyman Consulting Group. These documents included "Payment Advices," i.e., memoranda of payments, on Working Names stationery listing John Whitehead, a businessman actively involved in the mailing list industry, as the payee. (See Attachment 1). The Payment Advices were for the Truly Conservative Contributors list. Each document included the billing date, the "maildate," the "mailer," i.e., the organization purchasing the use of the names, the amount of names from the list being used, the amount of the commission per thousand names, and a deduction for the amount of money being paid to the Heyman Consulting Group. One of these Payment Advices referred to 5,100 names from Truly Conservative Contributors going to the RNC with a maildate of February 28, 1983. Another Payment Advice referred to 10,200 names from Truly Conservative Contributors going to the American Printing House for the Blind with a maildate of February 14, 1983. The dates indicate that these mailings may be the mailings referred to in the complaints initiating this matter.

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On December 4, 1985, the Commission found reason to believe that John L. Whitehead and his company, John Whitehead and Associates, violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. On that date, the Commission also approved a subpoena for documents and deposition to be sent to Mr. Whitehead. Due to the office move, the notification and subpoena were not mailed until December 23, 1985. Mr. Whitehead was deposed by attorneys of this Office on January 23, 1985. During the deposition, Mr. Whitehead proceeded to explain why he is listed as the payee for the aforementioned payment advices.

Mr. Whitehead's testimony indicates that the names that were used for the list "Truly Conservative Contributors" were one-quarter owned by Thomas Mays, one-quarter owned by Victor Heyman, and one-half owned by Working Names, of which Meyer Cohen is the president. Mr. Mays compiled the names for Mr. Whitehead and Mr. Whitehead gave the list to Mr. Mays in early 1982, approximately one year before the complaint was filed. During early 1983, when the list started generating income and Mr. Mays owed money to Mr. Whitehead for loans and transactions unrelated to mailing list activities, Mr. Mays and Mr. Whitehead decided to split Mr. Mays' share of the income from the list on a 50-50 basis until the loans were repaid.

Mr. Whitehead indicated that Mr. Cohen would make out checks to Mr. Whitehead, rather than Mr. Mays, in payment for the use of names, because most of the money sent by Mr. Cohen to Mr. Whitehead was not for "Truly Conservative Contributors", but rather, was for lists which were owned by Mr. Whitehead. Mr. Whitehead indicated that payment advices for Truly Conservative

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Contributors were addressed to him, rather than to Mr. Mays, because Mr. Mays was living with him at the time. Furthermore, he stated that he had asked Mr. Cohen why Mr. Cohen's documents would display his name rather than Mr. Mays' name and that Mr. Cohen informed him that this was "because all the lists had been in [Mr. Whitehead's] name previous to Tom [Mays] coming into picture, and [Mr. Cohen's] bookkeeper had kept the account set up in [Mr. Whitehead's] name."

II. LEGAL ANALYSIS

Section 438(a)(4) of Title 2 and section 104.15 of the Commission's Regulations provide that any contributor information copied from reports filed with the Commission may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of a political committee to solicit contributions from such committee. Section 104.15(a) includes reports filed with Secretaries of State within the prohibition.

The testimony of Mr. Whitehead does not contradict the evidence used as a basis for the probable cause findings made with respect to Working Names, Inc., Meyer T. Cohen, and Thomas Mays. Because conciliation has already concluded with a failure to reach an agreement with Working Names, Mr. Cohen, and Mr. Mays, this Office recommends that the Commission authorize the Office of the General Counsel to file suit against these respondents in United States District Court.

Although it appears that Mr. Whitehead gave the list to Mr. Mays who used it for commercial purposes, this Office recommends

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the Commission take no further action with regard to Mr. Whitehead. Mr. Whitehead gave the list to Mr. Mays for personal rather than pecuniary reasons. Although he received monies originating from the proceeds of the sale of the list, those payments represented repayments of private debts owed by Mr. Mays to Mr. Whitehead. Based on the foregoing, therefore, this Office recommends that the Commission take no further action with respect to the allegation that John L. Whitehead and John Whitehead and Associates violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.

III. RECOMMENDATIONS

1. Authorize the Office of General Counsel to file suit in United States District Court against Working Names, Inc., Meyer T. Cohen, and Thomas L. Mays.

2. Take no further action against John L. Whitehead and John Whitehead and Associates, and close the file as to these respondents.

3. Approve the attached letters.

4 June 1946
Date


Charles N. Steele
General Counsel

Attachments

1. Proposed letter to counsel for Working Names, Inc., Meyer T. Cohen, and Thomas L. Mays.
2. Proposed letter to counsel for John L. Whitehead and John Whitehead and Associates.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Thomas L. Mays)
Working Names, Inc.) MUR 1542
Meyer T. Cohen)
John L. Whitehead)
John Whitehead and Associates)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of June 10, 1986, do hereby certify that the Commission took the following actions in MUR 1542:

1. Decided by a vote of 4-2 to take no further action against John L. Whitehead and John Whitehead and Associates, and close the file as to these respondents.

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

2. Decided by a vote of 6-0 to:
 - a) Authorize the Office of General Counsel to file suit in United States District Court against Working Names, Inc., Meyer T. Cohen, and Thomas L. Mays.

(continued)

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Federal Election Commission
Certification for MUR 1542
June 10, 1986

Page 2

- b) Approve the letters attached to the
General Counsel's report dated June 4,
1986.

Commissioners Aikens, Elliott, Harris, Josefiak,
McDonald, and McGarry voted affirmatively for
the decision.

Attest:

6-11-86

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 18, 1986

Robert N. Levin, Esquire
Silver, Freedman & Taff
1735 Eye Street, N.W.
Washington, D.C. 20036

Re: MUR 1542
John L. Whitehead
John Whitehead and
Associates

Dear Mr. Levin:

On December 4, 1985, the Commission found reason to believe that your clients, John L. Whitehead and John Whitehead, violated 2 U.S.C. § 438(a)(4), a provision of the Federal Election Campaign Act of 1971, as amended, ("the Act") and 11 C.F.R. § 104.15, a provision of the Commission Regulations, in connection with the above referenced MUR.

After a review of information supplied by you and after consideration of the circumstances of this matter, the Commission has decided to take no further action with respect to your clients. Accordingly, the file has been closed in this matter as it pertains to your clients, and it will become a part of the public record within thirty days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to become part of the public record, please do so within 10 days of your receipt of this letter.

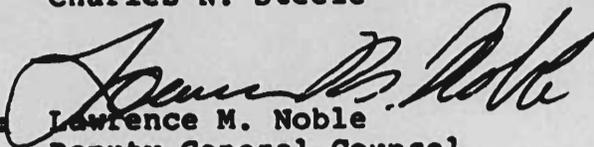
The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

The Commission also reminds you that the sale or commercial use of contributor information filed with the Federal Election Commission is in violation of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. You should take immediate steps to insure that this activity does not occur in the future.

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If you have any questions, please contact Jonathan Levin at 376-5690.

Sincerely,
Charles N. Steele


BY: Lawrence M. Noble
Deputy General Counsel

88040575259



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 18, 1986

Leslie Kerman, Esquire
Epstein, Becker, Borsody & Green, P.C.
1140 19th Street, N.W.
Washington, D.C. 20036

Re: MUR 1542
Working Names, Inc.
Meyer T. Cohen
Thomas L. Mays

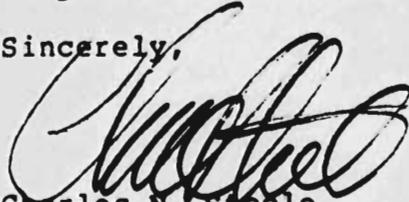
Dear Ms. Kerman:

You were previously notified that on July 30, 1985, the Federal Election Commission found probable cause to believe that your clients, Working Names, Inc., Meyer T. Cohen, and Thomas L. Mays, violated 2 U.S.C. § 438(a)(4), a provision of the Federal Election Campaign Act of 1971, as amended, and 11 C.F.R. § 104.15, a provision of the Commission Regulations, in connection with the captioned matter.

As a result of our inability to settle this matter through conciliation within the allowable time period, the Commission has authorized the institution of a civil action for relief in the U.S. District Court.

Should you have any questions, or should you wish to settle this matter prior to suit, please contact Ivan Rivera at (202) 376-8200 within ten days of your receipt of this letter.

Sincerely,


Charles N. Steele
General Counsel

83040575260

RECEIVED AT THE FEC
ACC# 798
86 JUN 25 P12:05

LAW OFFICES
SILVER, FREEDMAN & TAFF
(A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS)
1735 EYE STREET, N. W.
ELEVENTH FLOOR
WASHINGTON, D. C. 20006
(202) 429-6100
TELECOPIER (202) 833-3295

OF COUNSEL
ROBERT N. LEVIN
SUSAN BIRO

WRITER'S DIRECT DIAL NUMBER
(202) 429-

SIDNEY J. SILVER
ROBERT L. FREEDMAN, P. C.
BARRY P. TAFF, P. C.
JEAN ROSEN
HOWARD J. ROSS, P. C.
DAVID B. MYATT
JAMES S. FLEISCHER
JEFFREY M. WERTHAN, P. C.
LOIS G. JACOBS
KIP A. WEISSMAN*
EARL L. METHENY, P. C.*
CHERYL R. FRANK*
STEPHEN J. O'CONNOR
ILSA K. BUSH
DIANA M. SAVIT
JOHN J. SPIDI
MARTIN L. MEYROWITZ
CATHERINE H. EIKLAND*

* NOT ADMITTED IN D.C.

June 23, 1986

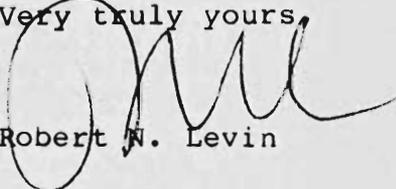
Lawrence M. Noble, Esq.
Deputy General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 1542
John L. Whitehead
John Whitehead and
Associates

Dear Mr. Noble:

Thank you for your letter of June 18, 1986 informing me that the Commission's decision to take no further action in the captioned. I must assume that the warning contained in the last paragraph of the first page was not intended to be directed to me, but rather was intended for my client. I know that Mr. Whitehead is aware of his responsibilities under the Act.

Thank you.

Very truly yours,

Robert N. Levin

RNL:mf

3 3 0 4 0 3 7 5 2 6 1

86 JUN 25 P4:09
STANDARD
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000# 8483

EPSTEIN BECKER BORSODY & GREEN, P.C.

ATTORNEYS AT LAW
1140 19TH STREET, N.W.
WASHINGTON, D. C. 20036
(202) 861-0900

250 PARK AVENUE
NEW YORK, NEW YORK 10177
(212) 370-9800

MALICK TOWER
ONE SUMMIT AVENUE
FORT WORTH, TEXAS 76102
(817) 334-0701

1875 CENTURY PARK EAST
LOS ANGELES, CALIFORNIA 90067
(213) 556-8861

FOUR EMBARCADERO
SAN FRANCISCO, CALIFORNIA 94111
(415) 398-8565

P.C. IN NEW YORK AND
WASHINGTON, D.C. ONLY

SEP 6 5:48
RECEIVED
FEDERAL ELECTION COMMISSION

September 6, 1985

83040575262

Jonathan Levin, Esquire
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20005

Re: Federal Election Commission MUR 1542

Dear Jonathan:

As discussed, enclosed please find two proposed Conciliation Agreements in the above-captioned matter.

I will be in touch with you on Monday regarding this complaint.

Very truly yours,

Leslie J. Kerman (ms)

Leslie J. Kerman

LJK:ms
Enclosures

GCC # 1444

WORKING NAMES, INC.

11600 Bolling Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



RECEIVED
GENERAL COUNSEL
SEP 9 PR: 47

September 9, 1986

Miss Lisa E. Klein
Federal Election Commission
999 E Street, 6th Floor, N.W.
Washington, D.C. 20463

RE: MUR 1542

Dear Miss Klein:

Enclosed are the signed conciliation agreements for Working Names, Inc., Meyer T. Cohen, and Thomas L. Mays.

I trust this concludes the matter satisfactorily, and that you will send me copies for my file, once Mr. Noble has signed them.

Sincerely,

Meyer T. Cohen
President

33040575263

MTC:bv
ENCLOSURES

WORKING NAMES, INC.

11600 Bolling Brook Place
Rockville, Maryland 20852

301/231-8001

DIRECT MAIL CONSULTANTS
FUND RAISING
LIST MANAGEMENT



RECEIVED AT THE FEC
OCT 15 1986
SEP 12 2:13

September 12, 1986

Miss Lisa E. Klein
Federal Election Commission
999 E Street, N.W.
6th Floor
Washington, D.C. 20463

RE: MUR 1542

Dear Miss Klein:

I am forwarding to you a signed copy, authorizing Mike Cohen to act on behalf of Thomas Mays, regarding this current matter.

Please do not hesitate to contact us if you have any questions.

Sincerely,

Cynthia Taylor

Cynthia Taylor
Office Manager

8 9 0 4 0 6 7 5 2 5 4

CT:bv
ENCLOSURE

SEP 16 3:43
GENERAL INVESTIGATIVE
DIVISION

To Whom it may concern:

I Thomas L. Mays.Jr. hereby authorized Mike Cohen to act
on my behalf with the Federal Election Commission business
at hand.

Sign:

Date:

Thomas L. Mays Jr.
September 10, 1981

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065 Backer

BEFORE THE FEDERAL ELECTION COMMISSION

COMM

AD
REC
CLERK

In the Matter of
Working Names, Inc.
Meyer T. Cohen
Thomas L. Mays

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)

MUR 1542 CP 13 P 3: 18

GENERAL COUNSEL'S REPORT

SEARCHED
SERIALIZED
INDEXED
FILED

I. BACKGROUND

On July 29, 1985, the Commission found probable cause to believe that Working Names, Inc., Meyer T. Cohen and Thomas L. Mays violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. §104.15 in connection with the commercial use of names of contributors filed with the Commission. The notification letter to counsel and the conciliation agreements were mailed on July 30, 1985.

During the month of August, this Office receive no substantive response from counsel for the respondents. On August 28, 1985, this Office sent a letter to counsel informing her that this Office had to receive counterproposals by September 6.

This Office received the counterproposals on September 6.

Based upon the foregoing, this Office believes that

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it is worthwhile to continue negotiations for an additional
thirty days.

Charles N. Steele
General Counsel

Sept. 12, 1935
Date

BY: 
Kenneth A. Gross
Associate General Counsel

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SENSITIVE



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

08 SEP 19 4:01

September 19, 1986

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele *CNS*
General Counsel

SUBJECT: Conciliation Recommendation in Federal Election Commission v. Working Names, Inc., Meyer T. Cohen, and Thomas L. Mays (Pre-Litigation) (Formerly MUR 1542)

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On June 10, 1986, the Commission authorized the Office of the General Counsel to file civil suit in federal district court against Working Names, Inc., Meyer T. Cohen and Thomas L. Mays for violations of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. Prior to the filing of the Commission's complaint, respondents initiated settlement negotiations. After lengthy negotiations, respondents have submitted signed conciliation proposals for the Commission's consideration. Attachment 1. As discussed below, the Office of the General Counsel recommends that the Commission accept the proposed conciliation agreements in settlement of this matter and approve the proposed notification letters. Attachment 2.

BACKGROUND

On October 30, 1984, the Commission voted to enter into pre-probable cause conciliation with respondents in MUR 1542. On the same date, the Commission also approved proposed conciliation agreements

Memorandum to The Commission
Conciliation Recommendation
FEC v. Working Names, Inc., et al.
Page 2

R 8 0 4 0 5 7 5 2 6 9

II. DISCUSSION

Memorandum to The Commission
Conciliation Recommendation
FEC v. Working Names, Inc., et al.
Page 3

For the foregoing reasons, the Office of the General Counsel recommends that the Commission accept the signed conciliation agreements submitted by respondents in settlement of this matter and approve the proposed notification letters.

RECOMMENDATIONS

1. Accept the signed conciliation agreement submitted by Meyer T. Cohen and Working Names, Inc., and the signed conciliation agreement submitted on behalf of Thomas L. Mays.
2. Close the file.
3. Approve the attached notification letters.

Attachments

1. Conciliation Agreements submitted by Meyer T. Cohen and Working Names, Inc., and Thomas L. Mays.
2. Proposed Notification Letters.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Federal Election Commission v.) (Formerly MUR 1542)
Working Names, Inc., Meyer T.)
Cohen, and Thomas L. Mays)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 24, 1986, the Commission decided by a vote of 6-0 to take the following actions in the above-captioned matter:

1. Accept the signed conciliation agreement submitted by Meyer T. Cohen and Working Names, Inc., and the signed conciliation agreement submitted on behalf of Thomas L. Mays, as recommended in the Memorandum to the Commission dated September 19, 1986.
2. Close the file.
3. Approve the notification letters, as recommended in the Memorandum to the Commission dated September 19, 1986.

Commissioners Aikens, Elliott, Harris, Josefiak, McDonald and McGarry voted affirmatively for this decision.

Attest:

9-24-86

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary: Fri., 9-19-86, 4:01
Circulated on 48 hour tally basis: Mon., 9-22-86, 4:00
Deadline for vote: Wed., 9-24-86, 4:00

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 29, 1986

Meyer T. Cohen, President
Working Names, Inc.
11600 Boiling Brook Place
Rockville, Maryland 20852

Re: Federal Election Commission v.
Working Names, Inc., et al.,
Mur 1542

Dear Mr. Cohen:

This is to notify you that on September 24, 1986, the Federal Election Commission accepted your signed conciliation agreement in settlement of the above-referenced matter. Accordingly, the file in MUR 1542 has been closed and will become part of the public record within 30 days.

A copy of the conciliation agreement, which has been executed on behalf of the Commission, is enclosed for your records.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lisa E. Klein".

Lisa E. Klein
Attorney

Enclosure

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Working Names, Inc.) MUR 1542
Meyer T. Cohen)

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by the National Conservative Political Action Committee. An investigation was conducted, and the Commission found probable cause to believe that Working Names, Inc. and Meyer T. Cohen ("Respondents") violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15 by renting to two organizations a list containing a name obtained from reports of contributions on file at the Federal Election Commission.

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

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

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

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

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

A. Respondent Working Names, Inc. is a company which provides mailing list services in the form of list management and maintenance and rents lists to various organizations through a list broker.

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B. Respondent Meyer T. Cohen is President of Working Names, Inc.

C. Respondents rented to two organizations portions of a list known as "Truly Conservative Contributors" which was owned and compiled by Heyman Consulting Group, Inc., Victor K. Heyman and Thomas L. Mays. Respondents rented 5,000 names to one organization and 20,000 names to another organization.

D. The portions rented to the two organizations contained a contributor's name and address listed in a report filed by NCPAC with the Commission. This name was also included on a pseudonym list filed by NCPAC with the Commission in order to protect against the illegal use of names and addresses of contributors.

E. The two organizations that rented the lists each solicited contributions from the contributor name referred to above in paragraph IV, 4.

F. Section 438(a)(4) of Title 2, United States Code, and section 104.15 of Title II, Code of Federal Regulations, states that no information copied from reports or statements filed with the Federal Election Commission may be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

V. Respondents' use of a name copied from a report filed with the Federal Election Commission for commercial purposes

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constituted a violation of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.

VI. Respondents contend that:

A. Respondents did not know that the portion of the list rented to the two organizations contained names of contributors taken from reports filed with the Commission.

B. Respondents had agreed to manage the list known as "Truly Conservative Contributors" based upon the list owners' representation that the list and the names included therein were not obtained by any wrongful, improper or illegal means.

C. Respondents contend that the violation was not knowing or willful.

VII. Respondents collectively will pay a civil penalty to the Treasurer of the United States in the amount of Two Thousand Dollars (\$2,000), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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

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X. Respondents shall make an initial civil penalty payment of \$1,000 to the Treasurer of the United States within thirty (30) days of the effective date of this agreement. Respondents shall pay the remaining \$1,000 of the civil penalty to the Treasurer of the United States within sixty (60) days of the effective date of this agreement.

XI. This Conciliation Agreement constitutes the entire agreement between the Commission and Respondents on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by any party or by agents of any party to this written agreement, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION:

Charles N. Steele
General Counsel

By: Lawrence M. Noble (ENC)
Lawrence M. Noble
Deputy General Counsel

9/29/86
Date

FOR THE RESPONDENTS:

Meyer T. Cohen
Meyer T. Cohen, President
Working Names, Inc.

9.9.86
Date

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 29, 1986

Thomas L. Mays
c/o Working Names, Inc.
11600 Boiling Brook Place
Rockville, Maryland 20852

Re: Federal Election Commission v.
Working Names, Inc., et al.,
Mur 1542

Dear Mr. Mays:

This is to notify you that on September 24, 1986, the Federal Election Commission accepted your signed conciliation agreement in settlement of the above-referenced matter. Accordingly, the file in MUR 1542 has been closed and will become part of the public record within 30 days.

A copy of the conciliation agreement, which has been executed on behalf of the Commission, is enclosed for your records.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lisa E. Klein".

Lisa E. Klein
Attorney

Enclosure

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2. Respondent is an owner, along with Heyman Consulting Group, Inc. and Victor K. Heyman, of a mailing list known as "Truly Conservative Contributors."

3. "Truly Conservative Contributors" was advertised and marketed for Respondent and the other co-owners by Working Names, Inc. and Meyer T. Cohen. The list was advertised and marketed to organizations soliciting by mail for contributions.

4. Working Names, Inc. and Meyer T. Cohen rented portions of "Truly Conservative Contributors" to two organizations. Five thousand names were rented to one organization and twenty thousand names were rented to another organization.

5. The portions rented to the two organizations contained a contributor's name and address listed in a report filed by NCPAC with the Commission. This name was also included on a pseudonym list filed by NCPAC with the Commission in order to protect against the illegal use of names and addresses of contributors.

6. The two organizations that rented the lists each solicited contributions from the contributor name referred to above in paragraph IV, 5.

7. Section 438(a)(4) of Title 2, United States Code, and section 104.15 of Title II, Code of Federal Regulations, states that no information copied from reports or statements filed with the Federal Election Commission may be sold or used by any person for the purpose of soliciting contributions

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or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

V. Respondent's use of a name copied from a report filed with the Federal Election Commission for commercial purposes constituted a violation of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. Respondent contends, however, that the violation was not knowing and willful.

VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of Two Thousand Dollars (\$2,000) pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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

IX. Respondent shall make an initial civil penalty payment of \$1,000 to the Treasurer of the United States within thirty (30) days of the effective date of the agreement. Respondent shall pay the remaining \$1,000 of the civil penalty

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to the Treasurer of the United States within sixty (60) days of the effective date of this agreement.

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party that is not contained in this written agreement shall be valid.

FOR THE COMMISSION:

Charles N. Steele
General Counsel

By: Lawrence M. Noble (L.M.N.)
Lawrence M. Noble
Deputy General Counsel

9/29/86
Date

FOR THE RESPONDENT:

Thomas L. Mays
Thomas L. Mays
TLC

9-8-86
Date

89040575281

Levin



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 29, 1986

Robert N. Levin, Esquire
Silver, Freedman & Taff
1735 Eye Street, N.W.
Washington, D.C. 20036

RE: MUR 1542
John L. Whitehead
John Whitehead and Associates

Dear Mr. Levin:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within 10 days.

Should you have any questions, contact Jonathan Levin, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Charles N. Steele
General Counsel

By: Lois G. Lerner
Associate General Counsel

830405/5282

Levin



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 29, 1986

Linda L. Fisher, President
Preferred Lists, Inc.
499 South Capitol Street, S.W.
Suite 504
Washington, D.C. 20003

RE: MUR 1542
Preferred Lists, Inc.

Dear Ms. Fisher:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within 10 days.

Should you have any questions, contact Jonathan Levin, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Charles N. Steele
General Counsel

By: Lois G. Lerner
Associate General Counsel

83040575283

Levin



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

December 29, 1986

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

RE: MUR 1542
Republican National Committee

Dear Mr. Braden:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within 10 days.

Should you have any questions, contact Jonathan Levin, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Charles V. Steele
General Counsel

By: Lois G. Lerner
Associate General Counsel

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Levin



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 29, 1986

Carson Y. Nolan, Ph.D.
President
American Printing House for the Blind, Inc.
P.O. Box 6085
Louisville, Kentucky 40206

RE: MUR 1542
American Printing House for
the Blind

Dear Dr. Nolan:

This is to advise you that the entire file in this matter, formerly captioned as MUR 1541, has now been closed and will become part of the public record within thirty days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within 10 days.

Should you have any questions, contact Jonathan Levin, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Charles N. Steele
General Counsel

By: Lois G. Lerner
Associate General Counsel

33040675285

Levin



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 29, 1986

Matthew S. Watson, Esquire
1914 Sunderland Place, N.W.
Washington, D.C. 20036

RE: MUR 1542
Victor K. Heyman
Heyman Consulting Group, Inc.

Dear Mr. Watson:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within 10 days.

Should you have any questions, contact Jonathan Levin, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Charles N. Steele
General Counsel

A handwritten signature in cursive script, appearing to read "Lois G. Lerner".

By: Lois G. Lerner
Associate General Counsel

83040675286

Levin



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 29, 1986

Robert R. Sparks, Jr., Esquire
Herge, Sparks, Christopher & Biondi
8201 Greensboro Drive
Suite 200
McLean, VA 22102

RE: MUR 1542

Dear Mr. Sparks:

This is in reference to the complaints you filed with the Commission on April 4, 1983, concerning alleged violations of 2 U.S.C. §438(a)(4) and 11 C.F.R. § 104.15.

The entire file in this matter has been closed. After conducting an investigation, the Commission made a number of determinations in this matter. In addition, conciliation agreements have been signed by a number of the respondents in this matter. Copies of these agreements and General Counsel's Reports pertaining to other determinations in this matter are enclosed.

Sincerely,

Charles N. Steele
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

Enclosures
Conciliation Agreements
General Counsel's Reports

83040675287



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 12, 1987

Robert N. Levin, Esquire
Silver, Freedman & Taff
1735 Eye Street, N.W.
Washington, D.C. 20036

Re: MUR 1542

Dear Mr. Levin:

Pursuant to your request, this Office is returning the originals of the documents submitted by you in connection with the above-captioned matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Anne A. Weissenborn".

Anne A. Weissenborn
Acting Assistant
General Counsel

Enclosures

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 1542

DATE FILMED 3/14/88 CAMERA NO. 2

CAMERAMAN GPC

88040575289