FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 5, 1988

Lee D. Foreman, Esquire
Haddon, Morgan & Foreman, P.C.
1034 Logan Street
Denver, Colorado 80203

RE: MUR 2583
Keith Glaser and Dennis Walto

Dear Mr. Foreman:

Enclosed are witness fee and mileage allowance checks payable to your clients, Keith Glaser and Dennis Walto. Please forward the appropriate check to each gentleman.

If you have any questions, please contact Ms. Jacoby or Mr. Bernstein at (202) 376-5690.

Sincerely,

Lawrence M. Noble

Lawrence M. Noble
General Counsel

Encl.

9304353229

RECEIVED
FEDERAL ELECTION COMMISSION

88 DEC -9 AM 9:58

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 2583
Stuart Karl	)	
	)	

SENSITIVE

COMPREHENSIVE INVESTIGATIVE REPORT # 1

On March 1, 1988, the Commission found reason to believe that Stuart Karl violated 2 U.S.C. §§ 441a(a)(1)(A), 441a(3), 441b(a) and 441f. Since that date this Office has been investigating allegations that monies were illegally infused into the 1984 and 1988 Hart campaigns.

On December 5, 1988, Stuart Karl, the principal actor in the activities being investigated in MUR 2583, was sentenced by the U.S. District Court, Central District California. The sentence included a $60,000 fine and three years' probation on guilty pleas to two counts of the indictment. These counts were Count 1 conspiracy and Count 10 violations of 2 U.S.C. §§ 441(f) and 437(g)(d). Probation was conditioned on Mr. Karl's cooperation with the government's continuing investigation. The maximum penalties which could have been imposed under the plea agreement were a fine of $350,000 and probation up to six years.

According to the press reports of this sentencing hearing, indictments against Hart campaign officials are anticipated. A copy of the UPI article is attached.

Although not indicated in the press release, the plea agreement provided that the remaining ten counts of the indictment would be dismissed on sentencing. Presumably that

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occurred. In view of the criminal proceedings that had been pending, this Office deferred taking the deposition of and compelling the production of documents from Mr. Karl. A letter, however, was recently sent to Mr. Karl's counsel. That letter, in recognition of the changed circumstances, sought the production of documents. This Office will continue to seek cooperation and information from Mr. Karl to advance the investigation of MUR 2583.

12-8-88
Date

LM Noble (JB)
Lawrence M. Noble
General Counsel

Attachment
UPI article

Staff Assigned: C. Jacoby

9304353230 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JOSHUA MCFADDEN

DATE: DECEMBER 12, 1988

SUBJECT: MUR 2583
COMPREHENSIVE INVESTIGATIVE REPORT #1
SIGNED DECEMBER 8, 1988

The above-captioned report was received in the Secretariat at 9:57 a.m. on Friday, December 9, 1988 and circulated to the Commission on a 24-hour no-objection basis at 12:00 p.m. on Friday, December 9, 1988.

There were no objections to the report.

9304353023 02

86C1360

LAW OFFICES
WUNDER & DIEFENDERFER
1615 L STREET, N. W., SUITE 650
WASHINGTON, D. C. 20036
(202) 659-3005
TELECOPIER: 659-3010

December 12, 1988

HAND DELIVERED

Jonathan Bernstein, Esquire
Federal Election Commission
General Counsel's Office
999 E Street, N.W.
Washington, D.C. 20463

RE: Stuart Karl MUR 2583
Subpoena

Dear Mr. Bernstein:

Per our conversation last week, please find enclosed a letter which I received from Mr. Karl's counsel who handle the matters relating to the Justice Department investigation.

Should you have any questions, please contact me at your convenience.

Very truly yours,

Paul E. Sullivan

Enclosure

PES:tg

cc: Chariman Josefiak
Vice-Chairman McDonald
Commissioner Aikens
Commissioner Elliott
Commissioner McGarry
Commissioner Thomas

88 DEC 13 PM 4:41

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88 DEC 13 PM 4:41

LAW OFFICES

WILLIAMS & CONNOLLY

HILL BUILDING

839 SEVENTEENTH STREET, N.W.

WASHINGTON, D.C. 20006

AREA CODE 202
331-5000

EDWARD BENNETT WILLIAMS (1920-1988)
PAUL R. CONNOLLY (1922-1978)

VINCENT J. FULLER
RAYMOND W. BERGAN
STUART E. SEIGEL
JEREMIAH C. COLLINS
ROBERT L. WEINBERG
DAVID POVICH
STEVEN M. UMIN
JOHN W. VARDAMAN, JR.
PAUL MARTIN WOLFF
J. ALAN GALBRAITH
JOHN G. KESTER
WILLIAM E. McDANIELS
BRENDAN V. SULLIVAN, JR.
AUBREY M. DANIEL, III
RICHARD M. COOPER
GERALD A. FEFFER
ROBERT P. WATKINS
JERRY L. SHULMAN
LAWRENCE LUCCHINO
LEWIS H. FERGUSON, III
ROBERT B. BARNETT
DAVID E. KENDALL
JOHN J. BUCKLEY, JR.
TERRENCE O'DONNELL
DOUGLAS R. MARVIN
JOHN K. VILLA
BARRY S. SIMON
KEVIN T. BAINE
STEPHEN L. URBANCZYK
PHILIP J. WARD
ELLEN SEGAL HUVELLE
FREDERICK WHITTEN PETERS
PETER J. KAHN
JUDITH A. MILLER
LON S. BABBY
SCOTT BLAKE HARRIS
MICHAEL S. SUNDERMEYER
JAMES T. FULLER, III
DAVID D. AUFHAUSER
BRUCE R. GENDERSON
CAROLYN H. WILLIAMS
F. LANE HEARD, III
STEVEN R. KUNEY
JAMES A. BRUTON, III
ROBERT S. LITT
GERSON A. ZWEIFACH
SARAH HELENE DUGGIN
PAUL MOGIN
DANIELA WINKLER
JEFFREY B. KINDLER
HOWARD W. GUTMAN
NANCY F. PREISS
RICHARD S. HOFFMAN
P. MICHELE ELLISON
MARY G. CLARK
MARK S. LEVINSTEIN
DIANNE J. SMITH
CHERRY JOY BEYSSELANCE
GEORGE ELLARD
DANIEL F. KATZ
JEFFERSON M. GRAY
MANLEY W. ROBERTS
ELENI M. CONSTANTINE
NICOLE K. SELIGMAN
LAURA P. MASUROVSKY
ROBERT M. KRASNE
KATHLEEN L. BEGGS*
MAUREEN T. CANNON
WILLIAM R. MURRAY, JR.
EVA M. PETKO
CYNTHIA C. HOGAN
MARK J. HULKOWER
KAREN ZACHARIA
MATTHEW D. LERNER
STEPHEN D. RABER
DAVID C. KIERNAN
JOHN D. CLINE
CHRISTOPHER B. MEAD
BRENT J. GURNEY
CHRISTOPHER C. KEARNEY
JOHN P. MONAHAN, III*
CHARNA E. SHERMAN
THOMAS J. MURPHY
KEVIN J. HASSON*
JENNY A. DURKAN
MARIE T. REILLY
NANCY A. BARD*
HEIDI K. HUBBARD
PETER W. CHATFIELD*
EVAN J. ROTH
MARK A. SRERE
ROBIN E. JACOBSOHN*
PAUL BUTLER*
CHARLES A. SWEET
GREGORY A. BAER*
GLENN J. PFADENHAUER
WILLIAM K. LAYMAN

COUNSEL
CHARLES H. WILSON
LYMAN G. FRIEDMAN
DONALD E. SCHWARTZ

*NOT ADMITTED IN DC

December 9, 1988

9304355323304

Paul E. Sullivan, Esquire
Wunder & Diefenderfer
Suite 650
1615 L Street, N.W.
Washington, D.C. 20036

Re: Stuart Karl

Dear Paul:

This letter is to serve as a follow-up to our recent telephone conversation concerning the Federal Election Commission's subpoena to Stuart Karl for the production of documents in MUR2583.

As I told you, all documents in Mr. Karl's possession relating to this matter have been turned over to the Grand Jury sitting in the Central District of California. Those documents now fall under the protection of Rule 6(e) of the Federal Rules of Criminal Procedure. The Federal Election Commission must deal directly with the Grand Jury if it seeks those documents. Nancy Wieben Stock is the Assistant United States Attorney handling the matter before the Grand Jury.

If you have any additional questions please feel free to contact me.

Very truly yours,

P. J. Kahn

Peter J. Kahn

PJK:jln

cc: Nancy Wieben Stock, Assistant United States Attorney

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 18, 1989

Nancy Wieben Stock, Esquire
Assistant United States Attorney
601 United States Courthouse
751 West Santa Ana Boulevard
Santa Ana, California 92701

RE: MUR 2533
Stuart Karl

Dear Ms. Stock:

On March 3, 1988, the Federal Election Commission issued a subpoena for the production of documents to Stuart Karl. Counsel on behalf of Mr. Karl stated that all documents in Mr. Karl's possession relating to this matter have been delivered to the Grand Jury sitting in the Central District of California. See enclosed letter dated December 9, 1988.

In other requests for documents in this matter, your office or the Federal Bureau of Investigation has provided copies upon the assent of the appropriate individuals. We request that you likewise provide the documents from Mr. Karl sought in the Commission's subpoena. All documents received by the Commission during the pendency of its investigation will be held in confidence. See 2 U.S.C. § 437g(a)(12)(A).

We would appreciate your immediate response to this request. If you have any questions, please contact Mr. Bernstein or Ms. Jacoby at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosures

9304355323305

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of	)	
	)	
Janice Benlein, Catherine W. Bramnick	)	MUR 2583
Linda J. Cacia, Edward Hanlon, Gary	)	
Hunt, Linda Kinwald, Janis Klinger,	)	
Pierre E. Loubet, John J. Lutgens,	)	
Ellen-Jayne Oshins, Court Shannon	)	
and Karen Stewart	)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter originally came before the Federal Election Commission (the "Commission") on March 1, 1988. Subsequently, the Commission assessed the involvement and possible culpability of certain other individuals in the events which were the focus of this MUR. On June 14, 1988, the Commission found reason to believe that Janice Benlein, Catherine W. Bramnick, Linda J. Cacia, Edward Hanlon, Gary Hunt, Linda Kinwald, Janis Klinger, Pierre E. Loubet, John J. Lutgens, Ellen-Jayne Oshins, Court Shannon and Karen Stewart, among other persons, had made contributions to federal candidates which were subsequently reimbursed by their employer, Stuart Karl, in violation of 2 U.S.C. §441f. These named individuals are referred to herein as the "Respondents."

2304353230306

The Respondents have requested pre-probable cause conciliation in this matter.1/

II. ANALYSIS

Each of the Respondents made contributions to various federal candidates. The Respondents have admitted to permitting their names to be used to effect contributions in the name of another in violation of 2 U.S.C. §441f by receiving reimbursements for each contribution.2/ The Respondents have also agreed to cooperate with this Office in its investigation of this matter, and have requested pre-probable cause conciliation.

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1/ The Respondents requested pre-probable cause conciliation on the following dates:

Respondent	Date of Letter
Janice Benlein	July 14, 1988
Catherine W. Bramnick	July 14, 1988
Linda J. Cacia	July 06, 1988
Edward Hanlon	July 29, 1988
Gary Hunt	July 08, 1988
Linda Kinwald	July 14, 1988
Janis Klinger	July 29, 1988
Pierre E. Loubet	July 15, 1988
John J. Lutgens	July 14, 1988
Ellen-Jayne Oshins	Aug. 01, 1988
Court Shannon	July 16, 1988
Karen Stewart	July 14, 1988

2/ The contributions admittedly reimbursed were:

Contributor	Contribution	Date	Committee
Janice Benlein	$ 500	5/28/86	Carter
Catherine W. Bramnick	250	2/03/84	1984 Hart
	1000	5/27/86	Carter

(footnote continued)

Based on information uncovered during the investigation to date, this Office believes that entering into conciliation with certain of the Respondents is appropriate at this time. These individuals are Janice Benlein, Catherine W. Bramnick,

2/ (footnote continued)

Contributor	Contribution	Date	Committee
Linda J. Cacia	$ 250	2/06/84	1984 Hart
	500	5/28/86	Carter
	100	3/19/86	Kerry
Edward Hanlon	250	2/06/84	1984 Hart
Gary Hunt	1000	9/23/86	Townsend
	1000	5/29/86	Carter
Linda Kinwald	100	3/12/86	Kerry
	900	9/22/86	Townsend
Janis Klinger	250	2/06/84	1984 Hart
Pierre E. Loubet	500	2/06/84	1984 Hart
	500	11/26/84	Bradford
John J. Lutgens	2000	5/28/86	Carter
	1000	3/20/86	Kerry
Ellen-Jayne Oshins	1000	1/23/84	1984 Hart
Court Shannon	500	2/03/84	1984 Hart
	750	11/20/86	1988 Hart
	1000	5/27/86	Carter
	1000	11/06/84	Bradford
	2000	10/30/86	Wirth
	2000	3/26/86	Kerry
	500	10/11/84	Cranston
Karen Stewart	200	3/12/86	Kerry

The recipient committees were Americans With Hart, Inc. ("1984 Hart"), Friends of Gary Hart-1988, Inc. ("1988 Hart"), The Kerry Committee ("Kerry"), Dave Carter for Congress ("Carter"), Citizens for Townsend, Inc. ("Townsend"), Carol Ann Bradford for Congress ("Bradford"), Committee for Tim Wirth, Inc. ("Wirth"), and Cranston for President ("Cranston").

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Linda J. Cacia, Edward Hanlon, Gary Hunt, Linda Kinwald, Janis Klinger, Pierre E. Loubet, John J. Lutgens, Ellen-Jayne Oshins and Karen Stewart. From most of these individuals this Office has received declarations under penalty of perjury or sworn deposition which disclose and admit their roles and participation in the reimbursement of contributions scheme. This Office also believes that these individuals will provide little, if any, further information. Their individual roles were apparently limited to the acknowledged incidents.3/ No evidence has indicated that these persons participated in the other activities which were the bases for the reason to believe determinations. Accordingly, this Office recommends that the Commission enter into conciliation with these eleven individuals prior to a determination of probable cause.

This Office further recommends that the Commission decline to enter into conciliation at this time with Court Shannon. Mr. Shannon was a corporate officer of Karl Home Video, Inc. and of Karl-Lorimar Home Video, Inc., the entities on which this investigation has focussed. Mr. Shannon admits that he made seven contributions over a two-year span and received $7750 in reimbursements from Stuart Karl. In view of Mr. Shannon's position as a corporate officer and his apparent long, close

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3/ A couple of these individuals performed some ministerial acts (e.g., distributing name cards, writing corporate checks as part of their jobs and as directed) in connection with events held or attended by Mr. Karl. Many of these people also acknowledged attending some candidate events which Mr. Karl sponsored.

relationship with Mr. Karl, this Office believes that conciliation prior to the completion of the investigation would be inappropriate.

III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

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IV. RECOMMENDATIONS

1. Enter into conciliation with Janice Benlein, Catherine W. Bramnick, Linda J. Cacia, Edward Hanlon, Gary Hunt, Linda Kinwald, Janis Klinger, Pierre E. Loubet, John J. Lutgens, Ellen-Jayne Oshins and Karen Stewart prior to a finding of probable cause to believe.

2. Decline to enter into conciliation with Court Shannon prior to a finding of probable cause to believe.

3. Approve the attached proposed sample conciliation agreement, sample letter and letter concerning Court Shannon.

1/19/89
Date

Lawrence M. Noble
General Counsel

Attachments
1. Requests for conciliation
2. Proposed sample conciliation letter
3. Proposed sample conciliation agreement
4. Letter concerning Court Shannon

Staff Member: C.L. Jacoby

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JOSHUA MCFADDEN
COMMISSION SECRETARY

DATE: JANUARY 25, 1989

SUBJECT: OBJECTION TO MUR 2583 - General Counsel's Report
Signed January 19, 1989

The above-captioned document was circulated to the Commission on Monday, January 23, 1989 at 11:00 a.m.

Objection(s) have been received from the Commissioner(s) as indicated by the name(s) checked below:

Commissioner Aikens	
Commissioner Elliott	X
Commissioner Josefiak	
Commissioner McDonald	
Commissioner McGarry	
Commissioner Thomas	

This matter will be placed on the meeting agenda for January 31, 1989.

Please notify us who will represent your Division before the Commission on this matter.

2304355323112

BEFORE THE FEDERAL ELECTION COMMISSION

In the **Matter of**	)	
	)	
Janice Benlein, Catherine W. Bramnick,	)	
Linda J. Cacia, Edward Hanlon, Gary	)	
Hunt, Linda Kinwald, Janis Klinger,	)	MUR 2583
Pierre E. Loubet, John J. Lutgens,	)	
Ellen-Jayne Oshins, Court Shannon	)	
and Karen Stewart	)	

CERTIFICATION

I, Hilda Arnold, recording secretary for the Federal Election Commission executive session of January 31, 1989, do hereby certify that the Commission decided by a vote of 5-1 to take the following actions in MUR 2583:

1. Enter into conciliation with Janice Benlein, Catherine W. Bramnick, Linda J. Cacia, Edward Hanlon, Gary Hunt, Linda Kinwald, Janis Klinger, Pierre E. Loubet, John J. Lutgens, Ellen-Jayne Oshins and Karen Stewart prior to a finding of probable cause to believe.

2. Decline to enter into conciliation with Court Shannon prior to a finding of probable cause to believe.

3. **Approve** the proposed sample conciliation agreement, **sample** letter and letter concerning Court Shannon, as recommended in the General Counsel's Report dated January 19, 1989.

(continued)

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Commissioners Aikens, Josefiak, McDonald, McGarry and Thomas voted affirmatively for this decision. Commissioner Elliott dissented.

Attest:

February 1, 1989
Date

Hilda Arnold
Hilda Arnold
Administrative Assistant

2304353231 4

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

February 6, 1989

Jeffrey M. Ettinger, Esquire
2030 East University Drive
Carson, California 90220

RE: MUR 2583
Linda J. Cacia and Gary Hunt

Dear Mr. Ettinger:

On June 14, 1988, the Federal Election Commission found reason to believe that your clients, Linda J. Cacia and Gary Hunt, violated 2 U.S.C. § 441f. At your request, on January 31, 1989, the Commission determined to enter into negotiations directed towards reaching conciliation agreements 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 you agree with the provisions of the enclosed agreements, please sign and return them, 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 agreements, or if you wish to arrange a meeting in connection with mutually satisfactory conciliation agreements, please contact Celia Jacoby or Jonathan Bernstein, the attorneys assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreements

9304353315

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 6, 1989

Pierre E. Loubet
2334 Naples
Newport Beach, California 92660

RE: MUR 2583
Pierre E. Loubet

Dear Mr. Loubet:

On June 14, 1988, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441f. At your request, on January 31, 1989, the Commission determined 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 is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. 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 arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Celia Jacoby or Jonathan Bernstein, the attorneys assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

9304353231 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 6, 1989

James D. Henderson, Esquire
Shea & Gould
1800 Avenue of the Stars
Suite 500
Los Angeles, California 90067

RE: MUR 2583
Ellen-Jayne Oshins

Dear Mr. Henderson:

On June 14, 1988, the Federal Election Commission found reason to believe that your client, Ellen-Jayne Oshins, violated 2 U.S.C. § 441f. At your request, on January 31, 1989, the Commission determined 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 is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. 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 arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Celia Jacoby or Jonathan Bernstein, the attorneys assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

9304353231 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 6, 1989

David M. Satz, Jr., Esquire
Saiber, Schlesinger, Satz & Goldstein
One Gateway Center
Newark, New Jersey 07102-5311

RE: MUR 2583
Janis Klinger

Dear Mr. Satz:

On June 14, 1988, the Federal Election Commission found reason to believe that your client, Janis Klinger, violated 2 U.S.C. § 441f. At your request, on January 31, 1989, the Commission determined 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 is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. 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 arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Celia Jacoby or Jonathan Bernstein, the attorneys assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

9304353231 8

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

February 6, 1989

Edward Hanlon
23 Fallinstar
Irvine, California 92714

RE: MUR 2583
Edward Hanlon

Dear Mr. Hanlon:

On June 14, 1988, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441f. At your request, on January 31, 1989, the Commission determined 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 is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. 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 arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Celia Jacoby or Jonathan Bernstein, the attorneys assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

9304353231 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 6, 1989

John D. Vandevelde, Esquire
Talcott, Lightfoot, Vandevelde,
Woehrle & Sandowsky
Thirteenth Floor
655 South Hope Street
Los Angeles, CA 90017

RE: MUR 2583
Janice Benlein, Catherine W. Bramnick, Linda Kinwald, John J. Lutgens and Karen Stewart

Dear Mr. Vandevelde:

On June 14, 1988, the Federal Election Commission found reason to believe that your clients, Janice Benlein, Catherine W. Bramnick, Linda Kinwald, John J. Lutgens and Karen Stewart, violated 2 U.S.C. § 441f. At your request, on January 31, 1989, the Commission determined to enter into negotiations directed towards reaching conciliation agreements 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 you agree with the provisions of the enclosed agreements, please sign and return them, 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 agreements, or if you wish to arrange a meeting in connection with mutually satisfactory conciliation agreements, please contact Celia Jacoby or Jonathan Bernstein, the attorneys assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreements

9304353320

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 6, 1989

Jeffrey M. Ettinger, Esq.
2030 East University Drive
Carson, CA 90220

RE: MUR 2583
Court Shannon

Dear Mr. Ettinger:

On June 20, 1988, you were notified that the Federal Election Commission found reason to believe that your client, Court Shannon, violated 2 U.S.C. § 441f. On July 16, 1988, you submitted a request to enter into conciliation negotiations prior to a finding of probable cause to believe.

The Commission has considered your request and determined, because of the need to complete the investigation, to decline to enter into conciliation prior to a finding of probable cause to believe.

At such time when the investigation in this matter has been completed, the Commission will reconsider your request to enter into conciliation prior to a finding of probable cause to believe.

If you have any questions, please contact Ms. Jacoby or Mr. Bernstein, the attorneys assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

9304353232 1

OGC #1711

LAW OFFICES
WUNDER & DIEFENDERFER
1615 L STREET, N. W., SUITE 650
WASHINGTON, D. C. 20036
(202) 659-3005
TELECOPIER 659-3010

89 FEB -1 10:2 FEC

February 1, 1989

MUR 2583

Michael A. Dymersky, Esquire
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: Federal Election Commission v. David Franklyn Stein, No. CV 88-04345 PAR (Ex)

Dear Mr. Dymersky:

In compliance with Judge Rymer's January 17, 1989 order in the above captioned matter, please find enclosed the documents which are required to be produced.

Should you have any questions, please contact me at your convenience.

Very truly yours,

Paul E. Sullivan

Enclosure

cc: Edward M. Medvene, Esq.
Peter Bagatelos, Esq.
David F. Stein

9304353223222

STEIN BRIEF GROUP

May 22, 1984

Assemblyman Bruce Young
13710 Studebaker Road
Suite 202
Norwalk, CA 90650

Dear Bruce:

I am pleased to announce that Senator Gary Hart will be the guest of honor at a cocktail reception at my home in Laguna Beach on Thursday, May 31st, from 5 - 7 p.m.

Since you have been a leading supporter of Gary in Southern California, I would like to invite you to join us on the 31st as my guest.

For your information, attendance at this reception will be limited to only those loyal Orange County Hart supporters who have contributed the maximum amount to his presidential campaign as allowed by Federal law ... $1,000 per individual.

The campaign for a big win in California will be expensive. The Hart Campaign's media budget for this state is over $1 million. Thus, we need to turn our cocktail party into another strong Orange County fund-raiser for Gary.

I have therefore created a Host Committee for my reception on the 31st. Members of the Host Committee will be asked to recruit at least one new contributor at the maximum amount of $1,000. (Remember, the limit applies on an individual basis; therefore, spouses and relatives can each give up to $1,000 -- Gary will not accept PAC money).

The Host Committee will meet for breakfast on Thursday, May 24th at 8:00 a.m. at the Pacific Club, located at 4110 MacArthur Blvd., in Newport Beach. I would greatly appreciate your attendance at this meeting, and any assistance you could provide in recruiting $1,000 contributors.

RSVP with Chris Townsend at 859-6995.

Cordially,

David F. Stein

20682 Ivy Glenn, Laguna Niguel, CA 92677 • (714) 859-6995

STEIN-BRIEF GROUP

December 10, 1984

Ms. Charlotte Conway
320 North Larchmont Boulevard
Los Angeles, California 90004

Dear Charlotte:

On behalf of David Stein, enclosed please find a list of names, addresses and telephone numbers of people we sent invitations for the Senator Gary Hart reception on December 16.

Yours truly,

Chris Townsend
Director of Public Affairs

9304355323324

Senator Hart Reception
December 16, 1984

Howard Adler
ADLER/FISHMAN
505 N. Tustin Avenue
Suite 282
Santa Ana, CA. 92705
(714) 953-0960

Frank Barbaro
HORTON.BARBARO & REILLY
517 North Main Street
Santa Ana, CA. 92702
(714) 835-2122

Andrew & Neila Bernstein
32 Songsparrow
Irvine, CA. 92714
(714) 526-2267

Jerry Bloch
Attorney-at-Law
450 West Fourth Street
Santa Ana, CA. 92701
(714) 547-0041

Ron & Vickie DeFelice
25482 Bootstrap Place
Laguna Hills, CA. 92653
(714) 831-9871

Peter Herman
26515 Azuer
Mission Viejo, CA. 92675
(714)834-3550

Nilane Lee
MASON & LEE
801 Civic Center Drive West
Suite 302
Santa Ana, CA. 92701
(714) 834-1441

Rich Meyer
The Meyer Group
Post Office Box 7247
Newport Beach, CA. 92660
(714) 754-7655

Martha Newkirk
434 Via Lido Nord
Newport Beach, CA. 92663
(714) 675-6736

Dr. Dan Ninburg
1208 Rowan Street
Anaheim, CA. 92801
(714) 635-4838

Richard O'Neill
822 North Broadway
Santa Ana, CA. 92701
(714) 835-9171

Don & Lynn Osen
Balboa Bay Club
1221 West Coast Highway #503
Newport Beach, CA. 92663
(714) 646-1952

Michael Ray
J. RAY CONSTRUCTION
2699 White Road #150
Irvine, CA. 92714
(714) 660-8888

Mark Rosen
19782 MacArthur Boulevard
Suite 280
Irvine, CA. 92715
(714) 835-1005

Susan Shuff
6232 Sierra Palos
Irvine, CA. 92715
(714) 851-0476

Robert Smith
2004 Yacht Vigilante
Newport Beach, CA. 92660
(714) 760-6913

Mike Stockstill
THE IRVINE COMPANY
Post Office Box I
Newport Beach, CA. 92660
(714) 720-2329

John Campbell
2219 El Pacifico
Laguna Hills, CA. 92653
(714) 768-7661

9304353225

Senator Hart Reception
December 16, 1984

Bruce Sumner
315 Amethyst
Balboa Island, CA. 92662
(714) 760-9300

Martin & Elaine Weinberg
615 Civic Center Drive #230
Santa Ana, CA. 92701
(714) 835-2400

9304353233226

BERNARD E. SCHNEIDER

August 3, 1983

Chris Townsend
Stein-Brief Group
29982 Ivy Blenn
Laguna Niguel, CA 92677

Dear Chris:

We would like to invite you to join us for a special reception on Thursday, August 18th from six to eight p.m. honoring U.S. Senator Gary Hart, Democratic Presidential Candidate. The event will be at the home of Stuart and Deborah Karl, 1832 Marapata, Corona del Mar (Irvine Terrace).

Gary Hart's campaign needs your assistance now. The campaign has an important message to carry to the people of this country. Our nation is at an historical crossroad. Our environment, our industries, our children and our efforts for peace need dramatic and intelligent leadership for us to move forward as a civilized people. Gary Hart is the person who has the vision, the youth, the compassion, the understanding, and the experience to pull us together in an effort unparalleled in our recent history.

The Senator refuses to accept influential PAC money in order not to be encumbered by special interests. Consequently, he urgently needs money from us so that he can be heard.

The cost of our event is $100 per person or $150 per couple. In addition, we will also be sponsoring a dinner immediately following the reception. The dinner (including the reception) costs $250 a person or $450 per couple. Please help Gary Hart now by completing

888 TEMPLE HILLS DRIVE · LAGUNA BEACH, CALIFORNIA 92651

9304355323327

and returning the enclosed reply card. If you have already given the legal limit ($1,000 per person), please raise the money from your friends.

Very truly yours,

Bernie

B. E. Schneider, for the
Host Committee

Art and Paula Axelrod
Jeff and Linda Broker
Frank Conner
Tom Daly
Dennis deSnoo
Fred Droz
Harvey Englander
Denny Freidenrich
Lee Kathryn Handy
Peter Herman
Dan Miller
Mike Ray
Geoff Stack
David Stein
Dan Young

9304355323288

STEIN BROE GROUP

March 12, 1984

Messrs. Oliver Hinkel
and Douglas Rosen
Americans With Hart
507 Eighth Street, S.E.
Washington, D.C. 20003

Dear Pudge and Doug,

As you are well aware, Orange County has played a critical role in the Gary Hart Campaign. Stuart Karl, Bernie Schneider and I have been working more than a year to raise funds and build a support network in our county, which has the second-largest Democratic voter registration of any county in the state of California.

Now that the Hart Campaign has moved into high gear the level of activity in California and Orange County in particular has increased dramatically. In response to this changing situation and to eliminate confusion, I believe it is essential that we formalize our campaign organization in Orange County immediately.

Therefore, on behalf of Stuart Karl and Bernie Schneider, I request your approval of the following officers for the Orange County Hart Campaign:

Chairman:	David Stein
Vice Chairman:	Bernie Schneider
Finance Chairman:	Stuart Karl

We have discussed this matter with John Emerson and received his approval, and will coordinate with John to finalize the rest of our campaign organization.

Please accept my aploogies for being unable to attend the National Finance Committee Meeting today. I have asked Stuart Karl to deliver this letter to you personally in order to obtain your authorization.

29982 Ivy Glenn, Suite One Hundred • Laguna Niguel, CA 92677 • (714) 859-6995

Thanks for your time and consideration.

Yours truly,

David F. Stein

cc: John Emerson

Approved: _____
Oliver Hinkel

Approved: _____
Douglas Rosen

9304353233 0

STEIN BRIEF GROUP

MEMORANDUM

To: CT

From: David

Subject: DS Tape 5/22/84

Date: 5/22/84

CT put in request for Angel game

I should talk to Chris Townsend about taking the Hart people out to the ball game as soon as he can and talk about who he would like to take. It should include Sims, Steve, Dan and a couple of the other people.

Also, tell Chris his left tail light is out on his Mercedes.

Talk to Chris about having Doug Rosen attend our host committee meeting on Thursday - get him fired up for the event. Put that in the mailing that we are going to have the National Finance Chairman at the breakfast.

Tell Chris that we should have the attorney from Bernie's office that is responsible for the Hart campaign to be on our host list also.

We also should get out immediately a letter on Monarch Beach stationery to the individuals who are the maxed out people for Hart and tell him the time and place for the party. We also need to start working on the logistics, whether or not we are going to keep valet service there and use volunteers that like to see Gary Hart or whether we should request the parking lot from the school or the church and do the shuttle which I think is more appropriate. We should have our 8 person vehicle by then, the Brougham, so we could use that to shuttle people back and forth. We have to let them know where they should park. The letter should also be kind of a pep talk about what this June 5th primary really means in terms of Gary's effort and that they have already made a maximum investment, they should enhance their investment be getting other people to contribute.

Catered by Gerstein's Agent

18071 Fitch Avenue • Irvine, CA 92714 • (714) 641-4900

9304355323331

It should go out no later than Friday. Do a sample letter that they can send out to their friends trying to get money to get all the contributors to try to raise some money for Gary. I think I mentioned earlier that we should get Doug Rosen to attend the Thursday host committee event.

9304353233332

STEIN-BRIEF GROUP

October 3, 1984

Mr. Tim Connolly
Americans with Hart
311 Massachusetts Avenue N.E.
Washington, D. C. 20002

Dear Tim:

Per our conversation over the telephone today, I am enclosing a complete copy of the documents in our file relevant to the purchase and subsequent lease-back of the computer by the Stein-Brief Group to Americans with Hart, Inc.

The monthly lease payment is $710.33. Your payment for the month of June is past due and still outstanding. We will forgive the payments for the period of July, August and September since the computer was in our possession.

Please sign and return the enclosed copy of this letter along with a check for $710.33 to cover the June payment. Upon receipt of these materials, we will ship the computer C.O.D. to your office immediately.

Please contact me if you have any questions.

Yours truly,

Chris Townsend
Director of Public Affairs

AGREED TO AND ACCEPTED THIS _____ DAY OF OCTOBER, 1984

Americans with Hart

BY: _____

9304355323333

March 14, 1984

Mr. Doug Rosen
Americans With Hart, Inc.
507 8th Street S.E.
Washington D.C. 20003

Dear Doug:

RE: COMPUTER LEASE, DAVID STEIN

Many thanks for the package of documents. These have all been executed by David and I return to you copies of the Agreement, Purchase Option and Bill of Sale for your records.

I also enclose the original yellow copy lease agreement. This has been signed by David but I think it also requires signature on behalf of Americans With Hart. Could you arrange this and return the original to me (unless you have signed another Lessor copy for our records--which you did not send).

Could you confirm that you are insuring the equipment in accordance with the lease terms and will be mailing us a check for February 25th rental payment.

I have been trying to call you but the hot line is too hot. I hope the campaign continues to progress to your satisfaction!

Kind regards,

Simon Whitmey

Enclosures

-LYTON TO BACK - (illegible)

Could you thank the
sales tax element. Simon/

1989

FRIENDS OF GARY HART
510 C STREET, N.E.
WASHINGTON, D.C. 20002

3/21 19 84 15-4/540 10

PAY TO THE ORDER OF David Stein $ 1420 64

fourteen hundred + twenty + 64/100 DOLLARS

1ST AMERICAN
FIRST AMERICAN BANK, N.A. WASHINGTON, DC
NORTH CAPITOL AND E OFFICE 20005

FOR Feb + March computer lease pmts

⑈001989⑈ ⑆054000043⑆ 3 272 826⑈

REC'D ACCT'G DEPT.

MAR 26 1984

STEIN-BRIEF COMPANY

9304 5323335

AMERICANS WITH HART, INC.
507 - 8TH STREET, S.E.
WASHINGTON, D.C. 20003

1332

4/24 19 84

15-7
540

PAY TO THE ORDER OF David Stein

$ 710.33

seven hundred ten + 33/100 DOLLARS

THE NATIONAL BANK OF WASHINGTON
MAIN OFFICE WASHINGTON, D.C. 20006

FOR computer lease pmt

⑈001332⑈ ⑆054000072⑆ 260 25 ⑈

930435323

REC'D ACCT'G DEPT.
APR 30 1984
STEIN-BRIER COMPANY

AMERICANS WITH HART, INC.
507 - 8TH STREET, S.E.
WASHINGTON, D.C. 20003

1608

May 30 19 84

15-7/540

PAY TO THE ORDER OF David Stein $ 710.33

Seven hundred ten and 33/100 DOLLARS

THE NATIONAL BANK OF WASHINGTON

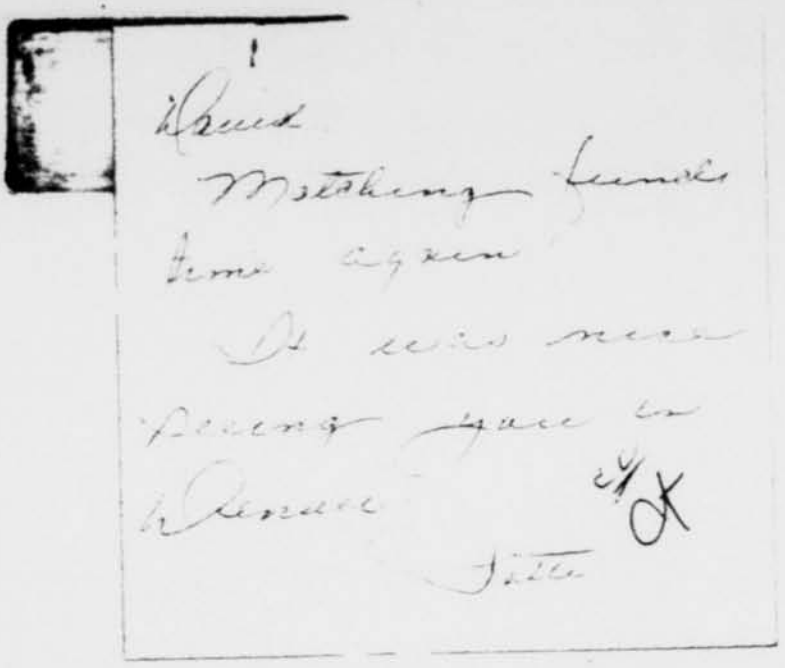
FOR payment Acct - computer lease

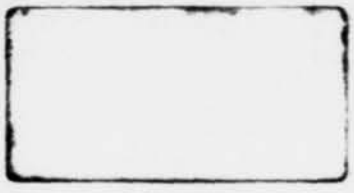
Carol S. Dickenson

⑈001608⑈ ⑆054000072⑆ 260 25 ⑈

2304353233

REC'D ACCT'G DEPT.
JUN 5 1984
STEIN-BRIEF COMPANY





9304355323338

FRIENDS OF
GARY
HART
1988

April 20, 1987

Mr. David F. Stein
29982 Ivy Glenn Dr.
Laguna Niguel, CA 92677

Dear Mr. Stein:

Under Chapter 96 of Title 26, United States Code, presidential primary candidates are entitled to receive federal funds from the Presidential Primary Matching Payment Account in an amount up to $250 from an individual contributor.

To ensure that only contributions which qualify as such are matched, the Federal Election Commission requires additional documentation regarding contributions submitted for matching which are signed by someone other than the accountholder identified on the face of the check.

A contribution
Check Amount: $250.00
Check Number: 2443
Check Date: January 21, 1987
Account: David F. Stein
identifies you as the accountholder, but is signed by someone other than yourself. It will qualify for matching only if the following statement is true, and, if so, verified by your signature. If you cannot verify the statement because of its inaccuracy, please provide a short explanation in order that the proper attribution of the contribution may be made.

Sincerely,

Patricia Main Sampers

Patricia Main Sampers
Assistant Treasurer

930435323339

FRIENDS OF
GARY
HART
1988

April 20, 1987

Mr. David F. Stein
29982 Ivy Glenn Dr.
Laguna Niguel, CA 92677

Dear Mr. Stein:

Under Chapter 96 of Title 26, United States Code, presidential primary candidates are entitled to receive federal funds from the Presidential Primary Matching Payment Account in an amount up to $250 from an individual contributor.

To ensure that only contributions which qualify as such are matched, the Federal Election Commission requires additional documentation regarding contributions submitted for matching which are signed by someone other than the accountholder identified on the face of the check.

A contribution
Check Amount: $250.00
Check Number: 2443
Check Date: January 21, 1987
Account: David F. Stein
identifies you as the accountholder, but is signed by someone other than yourself. It will qualify for matching only if the following statement is true, and, if so, verified by your signature. If you cannot verify the statement because of its inaccuracy, please provide a short explanation in order that the proper attribution of the contribution may be made.

Sincerely,

Patricia Main Sampers

Patricia Main Sampers
Assistant Treasurer

- -

This is to verify that the contribution described above represents my personal contribution and my signature appears below.

Account: David F. Stein
Mr. David F. Stein
29982 Ivy Glenn Dr.
Laguna Niguel, CA 92677

Check Amount: $250.00
Check Number: 2443
Check Date: January 21, 1987

Your signature: David F. Stein
(Please do not print) 02/02/87-004-15

1600 DOWNING STREET
DENVER, COLORADO 80218
(303) 894-1988

Paid for by Friends of Gary Hart 1988

GWH File

STEIN-BRIEF GROUP

April 23, 1987

Mr. Ervin Torell
74 Rockwood Court
San Francisco, CA 94127

Dear Erv:

On behalf of David Stein, enclosed please find his personal check made payable to Stark Aviation in the amount of $244.30 for a charter plane in Iowa.

Yours truly,

Christopher Townsend
Director of Public Affairs

CT/jes
Enclosure

9304355323411

29982 Ivy Glenn
Laguna Niguel, CA 92677
714-362-6995

DAVID F. STEIN
[redacted]
29982 IVY GLENN DRIVE
LAGUNA NIGUEL, CA 92677

2516

APRIL 23, 19 87 — 90-3848 / 1222

PAY TO THE ORDER OF STARK AVIATION $ $244.30**

**TWO HUNDRED FORTY FOUR AND 30/100---------- DOLLARS

PACIFIC NATIONAL BANK
4665 MACARTHUR COURT
NEWPORT BEACH, CALIFORNIA 92660

FOR PLANE RENTAL/CHARTER [redacted]

Charter Shareholder's Account
Judith Wyatt

Vender (Payee) Stark Aviation

REQUEST FOR DISBURSEMENT

Request Date 4/22/87

Nº 16866

Pay from Account: DS Personal

CO#	GL #	JOB #	COST CODE	LOT#	AMOUNT	COMMENTS
					$244.30	Plane Rental/Charter (Iowa)
			CHECK AMOUNT		$ 244.30	

Check Disposition: CT/Iowa

Check Requested By: CT

Approvals:

Marketing: _____ Operations: _____ G&A: _____

STB-103

Fik-GWH

STEIN-BRIEF GROUP

May 5, 1987

Pacific National Bank
4665 Mac Arthur Court
Newport Beach, CA 92660

Attention: Bookkeeping

Please use this as your authority to stop payment on the following check:

ACCOUNT NUMBER	10000070 06
ACCOUNT NAME	DAVID F. STEIN
AMOUNT	$244.30**
CHECK NUMBER	2516
CHECK DATE	4/23/87
PAYABLE TO	STARK AVIATION
WHO SIGNED CHECK	JUDITH WYATT
REASON FOR STOP PAYMENT	LOST IN MAIL

Thank you.

Sincerely

930435323433

GWH File

Jan
Ruckman

STEIN-BRIEF GROUP

May 6, 1987

Stark Aviation
Box 898
1442 Central Avenue
Fort Dodge, Iowa 50501

Attn: Jim

Dear Jim:

On behalf of David Stein, enclosed please find his personal check made payable to Stark Aviation in the amount of $244.30 for plane rental for Gary Hart.

Yours truly,

Christopher Townsend
Director of Public Affairs

CT/jes
Enclosure

9304355323344

DAVID F. STEIN

[redacted]
29982 IVY GLENN DRIVE
LAGUNA NIGUEL, CA 92677

2525

MAY 5, 19 87

90-3848
1222

PAY TO THE ORDER OF STARK AVIATION $ $244.30**

**TWO HUNDRED FORTY FOUR AND 30/100---------- DOLLARS

PACIFIC NATIONAL BANK
4665 MACARTHUR COURT
NEWPORT BEACH, CALIFORNIA 92660

Charter Shareholder's Account

FOR PLANE RENTAL/CHARTER [redacted]

930435532345

A MEMBER OF ARTHUR YOUNG INTERNATIONAL

Arthur Young

Suite 800
3200 Park Center Drive
P.O. Box 2410
Costa Mesa, California 92626
Telephone: 714/850-4600

Taxpayer ID No.:
13-5554208

February 28, 1987

Mr. David Stein
Stein Brief Group
29982 Ivy Glenn
Laguna Niguel, California 92677

930435532346

For services rendered in connection with the preparation of the 1988 Gary Hart Business Plan.

$7,571

RECEIVED
MAR 02 1987
DAVID STEIN

TVC

THE MONARCH GROUP
29982 Ivy Glenn
Laguna Niguel, CA 92677

714/859-6995

June 25, 1987

Ms. Patti Sampers
THE VOLUNTEER COMMITTEE
c/o Arthur Young
707 17th St., Suite 3800
Denver, CO 80202

Dear Patti:

Per your request, enclosed please find a completed in-kind contribution form from David F. Stein for his personal contribution of $940.00 to The Monarch Group on behalf of The Volunteer Committee. Please contact me if you have any questions or need additional information.

Yours truly,

Christopher Townsend
President

CT/jes
Enclosure

9304353234 7

THE VOLUNTEER COMMITTEE
IN-KIND CONTRIBUTION RECORD

CONTRIBUTOR:

Name David F. Stein
Address 9 Lagunita
City Laguna Beach State CA Zip 92651
OPTIONAL: Phone (Business) 714/859-6995 (Home) _____
Occupation Real Estate Developer
Employer/Business:
Name Stein-Brief Group
Address 29982 Ivy Glenn Dr.
City Laguna Niguel State CA Zip 92677
Contribution amount $ 940.00 Date of contribution 6/25/87

DESCRIPTION (Attach documentation where available):

VALUE:

Amount: $_____ Basis for assigning value:

ACCOUNTING:

Income account __ - ____ Description _____
Expense account __ - ____ Description _____
Source code __ - __ - __ Description _____

2/83

93043532348

HOLD

STEIN-BRIEF GROUP

TO: Judy Wyatt
FROM: Christopher Townsend
SUBJECT: SCHEDULING FUNDRAISING MEETINGS FOR DAVID STEIN
DATE: March 31, 1987
cc: David Stein

9304353233449

The following is a list of individuals we need you to call and schedule personal meetings with David Stein to discuss Gary Hart:

Rich Meyer 754-7655

Name	Phone Number	Comments
Richard O'Neill	835-9171	Had meeting w/o 3/23/87
Frank Barbaro	835-2122	Scheduled for 4/8 @ 11:30 AM for lunch
Howard Adler	833-2445	Scheduled for 4/16 @ 8:30 AM for breakfast
Geoff Stack	476-8220	
Mark Lee	863-0124	Has already committed to help Bernie Schneider; scheduled for 4/15 for lunch
Jeff Elsten	531-2852	
Tom Hayden	213/451-5733 916/445-1676	
Howard Ecker	312/726-3330	
Lee Schleshinger	504/581-5005	
Bart Thomsen	857-4400	
Ray Verches	529-0770	

Tom Nielsen	720-2011	Mike Stockstill has committed for Gephardt
Walter Gerken	640-3011	
Harold Price	494-9826	
Steve Pauley	552-1111	
Tom Kelly	641-2100	Gave $250 to Hart but also a big Dekaukis fan from his Massachusetts background; he's available for lunch on the 13th, 14th and 17th of April and would be willing to host David at the Center Club; he is hosting Hart Cabinet Associates Meeting with the Mahdesians on April 2 at his office
Martha Newkirk	494-0045	
Leonard & Bill Shane	842-9333	Lunch together in a neutral location; not Pacific Club
Fred Droz	852-8057	Discuss advance in Texas and his lady friend interested in buying David's house; set up time for them to tour
Bill Pohlard (?)		He's from MN and Stein thinks his Dad is one of the owners of the MN Twins baseball team; CT needs to check out first
Gregory M. Lloyd	752-0501	Attorney; just joined the Foundation; met at the Chairs' Roast; was real interested in doing money for Hart. I think David can close him if he is willing to spend time doing that.
Surendra Patel	671-0770	An Indian who has done a lot of money for Gary on his own; discuss with CT
Bruce Lee	525-3261	
Wylie Aitken	834-1424	

David should be aware that all of these individuals have been sent invitations for the Marvin Davis $1,000 per person fundraiser on April 15.

/jes

9304355323560

STEIN BRIEU GROUP

February 24, 1984

Mr. John Emerson
Manatt, Phelps, Rothenberg & Tunney
11355 West Olympic Boulevard
Los Angeles, California 90064

Dear John:

Enclosed please find the following documents relevant to the fundraiser hosted by David Stein on behalf of Senator Gary Hart on Sunday, February 12, at the Pacific Club in Newport Beach:

-- Late check for $250 from Bernie Schneider

-- Contribution list and photocopies of the checks received at the reception. (Doug Rosen took the checks that evening)

-- Attendance register

-- Photocopy of news article in The Register about the reception.

We have also secured individual sponsors to pay for the costs of the reception (approximately $750), documentation of which I will forward to you shortly. At that time, I will also send you copies of thank you letters from David that are being sent to the contributors.

In the meantime, we are putting together a slate of Convention delegates from the five congressional districts in Orange County and will forward the completed forms to you as soon as possible.

Looking forward to victory in New Hampshire!

Yours truly,

Chris

Chris Townsend

CT/gs

enclosures

GARY HART RECEPTION
PACIFIC CLUB - FEBRUARY 12, 1984
ATTENDANCE REGISTER

		PHONE
Bart Thomsen	3 Cascade, Irvine	(714) 730-6000
Thomas Green	23221 South Pointe Drive, Suite 101, Laguna Hills, CA 92653	(714) 859-5977
Robert Stiens	6000 Garden Grove, Westminster	(714) 894-8326
Harold & Joyce Weitzberg	2023 Flamingo Drive, Costa Mesa	(714) 751-3948
Sharon Moskow	289 Linden Place, Yorktown Heights, N.Y. 10598	-----
Allen & Catherine Unvert	309 North Star Lane, Newport Beach 92660	(714) 631-1553
Thomas Pendry	12321 Ocean Park #5, Los Angeles, 90064	(213) 478-9437
John R. Hanna	517 N. Main, 2nd Floor, Santa Ana, CA 92714	(714) 754-6272
Rod Speer	The Register, 625 N. Grand, Santa Ana, CA 92714	(714) 754-6272
H. A. "Harvey" Englander	1 Newport Place-970, Newport Beach	(714) 833-8393
Lucille Kuehn	1831 Seadrift Drive, Corona del Mar, CA 92625	(714) 673-0685
Ken & Nancy Stuart	1758 Santa Ana Avenue, Costa Mesa 92627	(714) 631-2321
Kim Norton	1818 Abbey, Newport Beach, 92660	(714) 760-9009
Court Shannon	2006 Kewamee Drive, Corona del Mar, 92625	(714) 645-7053
Pierre E.Loubet	107 Abalone, Balboa Island 92662	(714) 673-4071
Carol Semenuk	427 Dahlia, Corona del Mar, 92625	-------
Tom Daly	425 N. West, Anaheim	(714) 991-4366
Tom Davis	32402 Via Antibes, So. Laguna, 92677	(714) 851-7711
Jim & Kathy Smith	33391 CockleShell, So. Laguna 92677	(714) 661-2218
Joseph Wm. Smith	33671 Shackleton Isle, Laguna Niguel 92677	(714) 496-2996
Connie Beethe David Stein Chris Townsend	29982 Ivy Glenn, #100, Laguna Niguel 92677	(714) 859-6995
Nancy Emerson		
Marcela Howell		
Dn & Beth Anne Haarer	25482 Hillsboro Drive, Laguna Niguel 92677	(714) 495-2067

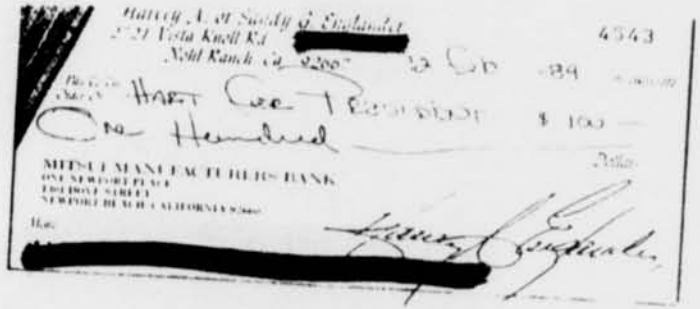
9304353232352

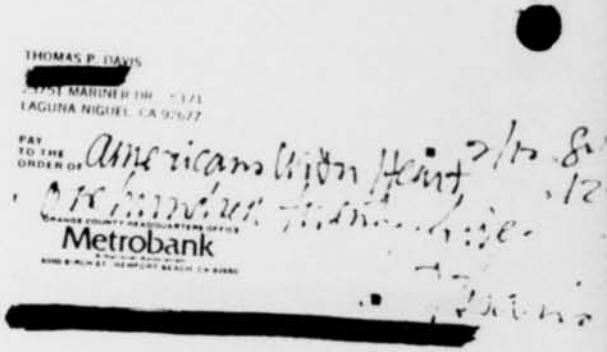
GARY HART RECEPTION
PACIFIC CLUB - FEBRUARY 12, 1984
CONTRIBUTION LIST

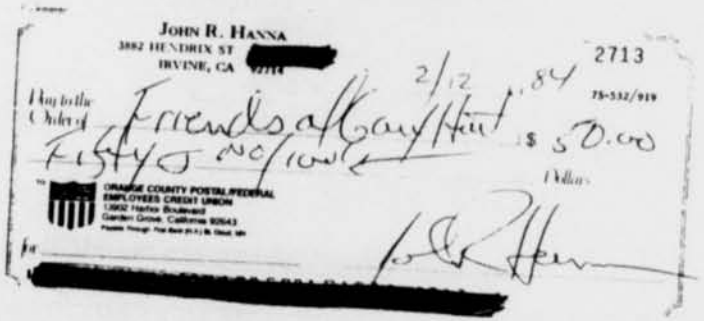
NAME	AMOUNT
Bernie Schneider	$ 250
Harvey Englander	100
John Hanna	50
Tom Daly	50
Tom Davis	125
Ken Stuart	250
Lucille Kuehn	25
Jim Smith	1,000
Tom Green	250
Barry Brief	1,000
Robert Stiens	100
	$3,200

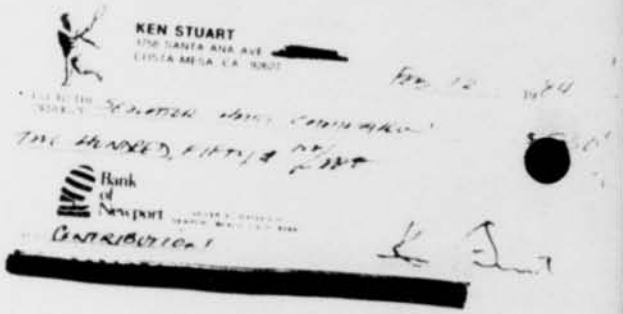
9304353253

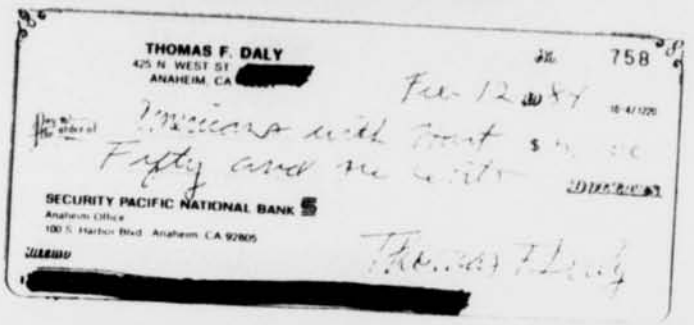
9304353235 4

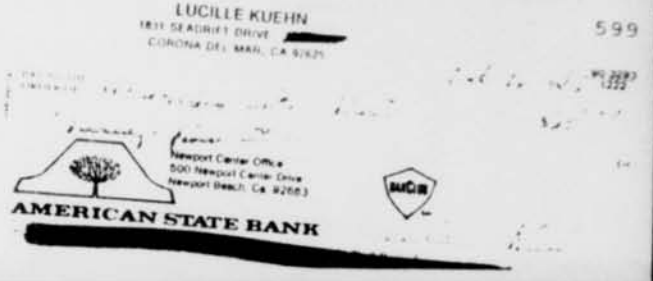












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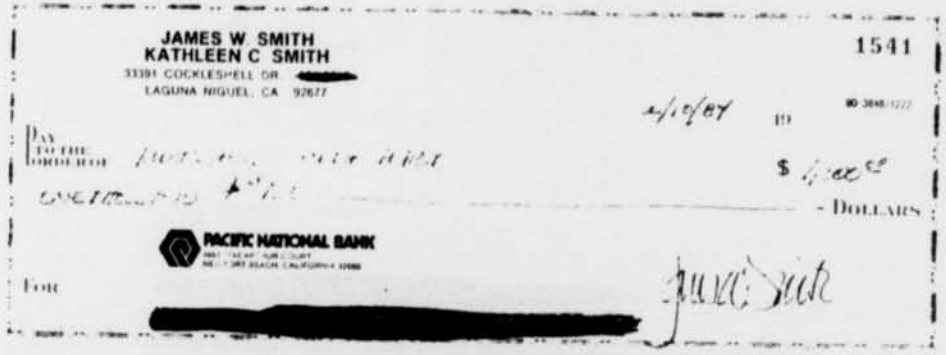
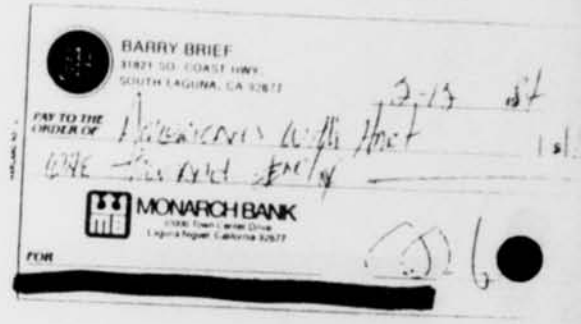
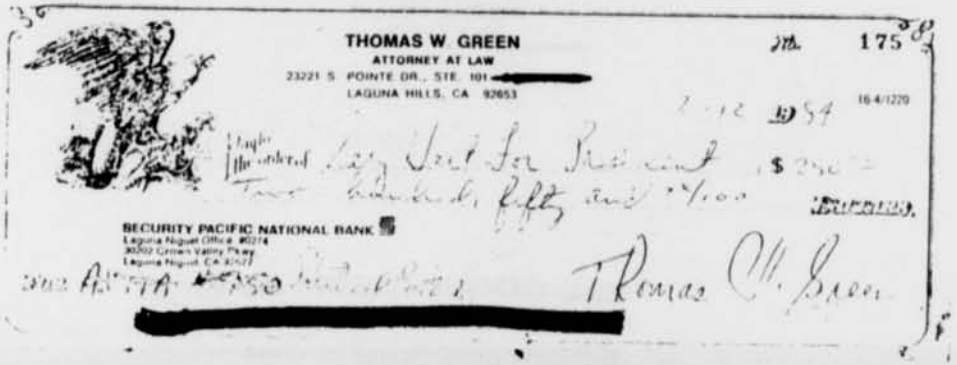
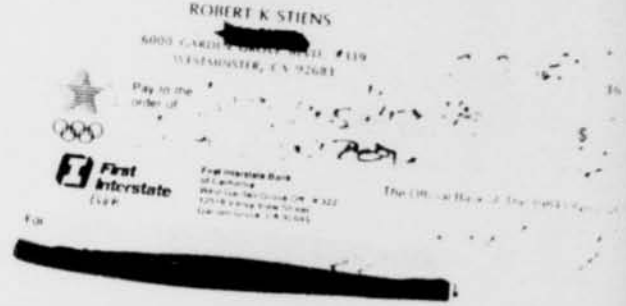

JAMES W. SMITH
KATHLEEN C. SMITH
33391 COCKLESHELL DR
LAGUNA NIGUEL, CA 92677
1541
PACIFIC NATIONAL BANK
- DOLLARS
For


BARRY BRIEF
31821 SO. COAST HWY
SOUTH LAGUNA, CA 92677
MONARCH BANK
FOR


THOMAS W. GREEN
ATTORNEY AT LAW
23221 S. POINTE DR., STE. 101
LAGUNA HILLS, CA 92653
175
SECURITY PACIFIC NATIONAL BANK
Laguna Niguel Office #0214
30702 Crown Valley Pkwy
Laguna Niguel, CA 92677
Thomas W. Green


ROBERT K. STIENS
First Interstate
FOR

BERNARD E. SCHNEIDER
P O BOX 4133
LAGUNA BEACH, CA 92651

EXPLANATION

90-3887
1222

0122

PAY Two Hundred Fifty and xx/100 DOLLARS

TO THE ORDER OF	DATE		CHECK NO.	CHECK AMOUNT
Americans w/ Hart	2-12-84	Political Contribution	0122	250.-

BERNARD E. SCHNEIDER

THE LAGUNA BANK, N.A.
305 FOREST AVENUE LAGUNA BEACH, CA 92651

[redacted]

930435323256

April 17, 1984

Mr. Doug Rosen
"Americans With Hart"
507 8th Street, S.E.
Washington, D.C. 20002

Dear Doug:

On behalf of Messrs. David Stein, Bernie Schneider and Stuart Karl of the Orange County Hart Campaign, enclosed please find a contribution schedule and photocopies of checks and in-kind contributions totalling $1,240.00 payable to "Americans With Hart". The checks were sent directly to your Denver office.

We request that the total amount be credited to the National Finance Committee account of Bernie Schneider (code #CAFC43).

Also enclosed is a bill from Lounge Car Tours totalling $1,693.96 for the buses used to transport 200 Orange County Hart supporters to the Carole King concert at the Dorothy Chandler Pavilion on March 24, 1984. Per our previous discussions, the prompt payment of this bill by the campaign directly to Lounge Car Tours would be greatly appreciated.

If you have any questions, or desire additional information, please feel free to contact me.

Yours truly,

Chris Townsend

Chris Townsend
Executive Assistant

Enclosures

cc:

INVOICE NO: 21355

L O U N G E C A R T O U R S

CHARTER DIVISION
8512 NATIONAL BLVD.
CULVER CITY, CA 90230
(213) 558-4477

DATE: 03/31/84

BILL TO:

AMERI AMERICANS WITH HART/D. ROSEN
[illegible] 4TH STREET S.E.
WASHINGTON, D.C. 20002

GROUP:

NAME: GARY HART
ORDERED BY: C. TOWNSEND
CHARTER #: [illegible]

SERVICE DATE	P/U TIME	DROP TIME	ELAPSED TIME	------CHARGES------ QTY @ RATE		EXT. $
03/24/84	1800	0115	7:15	HOURS	5 248.50	248.50
NEWPORT/MUSIC CENTER, L.A./NEWPORT				HOURS	2 48.50	97.00
21 PAX LOUNGECRUISER/BUS 1						
					TOTAL TRIP	345.50
03/24/84	1800	0100	7: 0	HOURS	5 248.50	248.50
SAME/21 PAX LOUNGECRUISER/BUS 2				HOURS	2 48.50	97.00
					TOTAL TRIP	345.50
03/24/84	1800	0100	7: 0	HOURS	5 248.50	248.50
SAME/53 PAX TOWNCRUISER/BUS 3				HOURS	2 48.50	97.00
					TOTAL TRIP	345.50
03/24/84	1800	0100	7: 0	HOURS	5 248.50	248.50
SAME/53 PAX TOWNCRUISER/BUS 4				HOURS	2 48.50	97.00
					TOTAL TRIP	345.50
03/24/84 1800						
SAME/46 PAX DELUXCRUISER/BUS 5/DROP 25:00						
MISCELLANEOUS CHARGE						
					TOTAL TRIP	0.00

MISC: [illegible] TOTAL FOR AS PER PO 291.00
[illegible] TAX 1,672.00
[illegible] 11.71
[illegible]

AMERICANS WITH HART

March 1, 1984

Dear Friend:

On February 28, 1984 something historic happened in American politics. Senator Gary Hart decisively defeated Walter Mondale by the largest margin of victory ever in the New Hampshire Democratic Presidential Primary. The result of New Hampshire is clear:

Gary Hart is not only the candidate for tomorrow:

Gary Hart is THE candidate for TODAY!

Yet while Gary's victory in New Hampshire and his emergence as a national candidate may have been a surprise to Mondale, the press, and the so-called political "experts," it was not a surprise to Gary and his supporters. He knows that given the opportunity to tell his story, he can win.

Gary's message is direct and responsive: there is an alternative to the old politics which brought the Democratic Party to its lowest point in years and threatens to keep it there--there can be a new era of Democratic politics--a "New Democracy." Gary's popularity will continue to rise as more Democrats realize that he is their true alternative to "politics as usual."

But in order to win the Democratic nomination, Gary needs our financial support today!

There is little time to savor the victory of New Hampshire as "Super Tuesday" looms on March 13th, when primaries and caucuses will be held in ten states, committing over delegates. Gary will need more than superb organization to deliver his messages to so many Democrats in so little time. He needs mass exposure over television, radio, and print media to bring his story home.

That is why we are asking you for your help.

By making a contribution to "Americans With Hart" you will help pay for media time that will make the difference on Super Tuesday. By mailing your check today payable to "Americans With Hart" you will help ensure the opportunity for Gary to tell his story--just like he did in New Hampshire--during the upcoming primary and caucus battles.

9304353523569

On behalf of everyone concerned about the future of our County and Country, we urge you to please send whatever amount you can afford to Gary in the return envelope provided. (The contribution limit is $1,000 per individual--corporate checks cannot be accepted.)

Please act now and join us in lifting Gary Hart to victory! We've got the momentum--help us keep it!!

Yours truly,

David Stein Bernie Schneider Stuart Karl

9304353236O

AMERICANS WITH HART

March 1, 1984

Dear Friend:

On February 28, 1984 something special happened in American politics. Senator Gary Hart defeated Walter Mondale by the largest margin of victory ever in the New Hampshire Democratic Presidential Primary. The result of New Hampshire is clear:

Gary Hart is not only the candidate for tomorrow --

Gary Hart is the candidate for TODAY!

While Gary's victory in New Hampshire and his emergence as a national candidate may have been a surprise to Mondale, the press, and the "political experts," it was not a surprise to Gary. He has been saying for more than a year, that given the opportunity to tell his story, he can win.

Gary's message is clear. There is an alternative to the old politics which brought the Democratic Party to its lowest point in years and threatens to keep it there. There can be a new era of Democratic politics -- a "New Democracy." Gary's popularity will continue to rise as more Democrats realize that he is the true alternative to "politics as usual."

However, in order to win the Democratic nomination, Gary needs our financial support today!

There is little time to savor the victory of new Hampshire as "Super Tuesday" looms on March 13th, when primaries and caucuses will be held in nine states, committing over 600 delegates. Gary will need more than superb organization to deliver his messages to so many Democrats in so little time. He needs mass exposure over the television, radio, and print media to bring his story home.

That is why we are asking you for your help.

By making a contribution to "Americans With Hart" you will help pay for media time that will make the difference on Super Tuesday and in the coming months. By mailing your check today payable to "Americans With Hart" you will help ensure the opportunity for Gary to tell his story -- just like he did in New Hampshire -- during the upcoming primary and caucus battles.

On behalf of many people concerned about the future of our County and Country, we urge you to please send whatever amount you can

9304353236 1

afford to Gary in the return envelope provided (The contribution limit is $1,000 per individual -- corporate checks cannot be accepted.)

Please act now and join us in lifing Gary Hart to victory! We've got the momentum -- help us keep it!!

Yours truly,

David Stein Bernie Schneider Stuart Karl

p.s. We wrote this letter before the Maine caucus. The message is clearer than ever. Hart won in Maine and he will win on Super Tuesday with our help.

9304353523662

Name:_____ Amt. $_____

Home Address:_____

City:_____ State:_____ Zip:_____

Ph: (h)_____ (o)_____

Employer:_____ Occupation:_____

Business Address:_____

_____

Please make checks payable to: AMERICANS WITH HART

Only two candidates can now make this statement:

"I am running to win the Democratic Nomination for President."

Gary Hart

Walter Mondale

"I believe my strong showing in the Iowa caucuses makes this election a two-person race between me and Walter Mondale.

But if you listen to the experts, you would think this nomination process is all over. Over, before a single vote is cast in New Hampshire.

I disagree. This race has just begun.

The voters of New Hampshire have a proud tradition of beginning and shaping our national debate. This tradition will not end in 1984.

The process of nominating a presidential candidate is the soul of democracy. At a time when the United States is faced with difficult challenges as well as great opportunities, open debate is the only way a free people can choose their future course.

1984 is not the time for symbolic gestures or "sending a message to Washington." The voters of this country need leadership and ideas, not symbols.

In my 10 years as U.S. Senator from Colorado, I have demonstrated my ability to anticipate the issues of the future and to provide important leadership on them. These issues include: acid rain; women's rights; the Senate fight to stop the MX; preservation of the school lunch program; opposition to apartheid in South Africa; banning the landfill disposal of toxic wastes; and energy conservation.

I am the *only* candidate for President who voted against every element of Ronald Reagan's supply-side "trickle-down" economic program, offering a comprehensive alternative instead.

I decided to campaign for the Presidency because I believed my ideas could improve the lives of people in the United States and around the world, lives that are increasingly threatened by the actions of the Reagan administration. In the last 3 years, we have had:

- a government whose foreign policy is so ill-defined that 300 Marines were killed in Lebanon and we don't even know why.
- a government that has run up the biggest budget deficit in history, committing our children to a kind of economic Vietnam to pay it off, while cynically claiming to endorse a "balanced budget" constitutional amendment.
- a government that gutted the social programs that help women and children while swearing that it supported the "strengthening" of the family.
- a government that put incompetents and perjurers in charge of the environmental programs that protect the quality of our air, our water, and our land.

And worst of all, we've had a government that for the first time in years isn't even talking with the Soviet Union about the most serious problem in the world: how to stop the insanity of the nuclear arms race and move the world away from the brink on which we are now poised.

I have offered clear, innovative, and constructive approaches to the multiple failures of the Reagan administration.

I have also fought to lead the Democratic party into the future. For America's sake, we must win back the White House in November. But if we are to win, we must offer solutions to tomorrow's problems, not simply embrace the past.

As President, I would pursue new ideas. I would freeze the production of plutonium. I would tax polluters and use the money to clean up hazardous waste. I would establish Individual Training Accounts to protect the jobs of American workers.

As a candidate I have worked hard to demonstrate why I am worthy of your support to be the next President of the United States. I want to bring these ideas to the rest of the American people.

Your vote for me on Tuesday will ensure that this vital debate about our nation's future will continue, and that a *real* choice can be made in November."

Gary Hart

Gary Hart

Gary Hart for President

Gary and Lee Hart

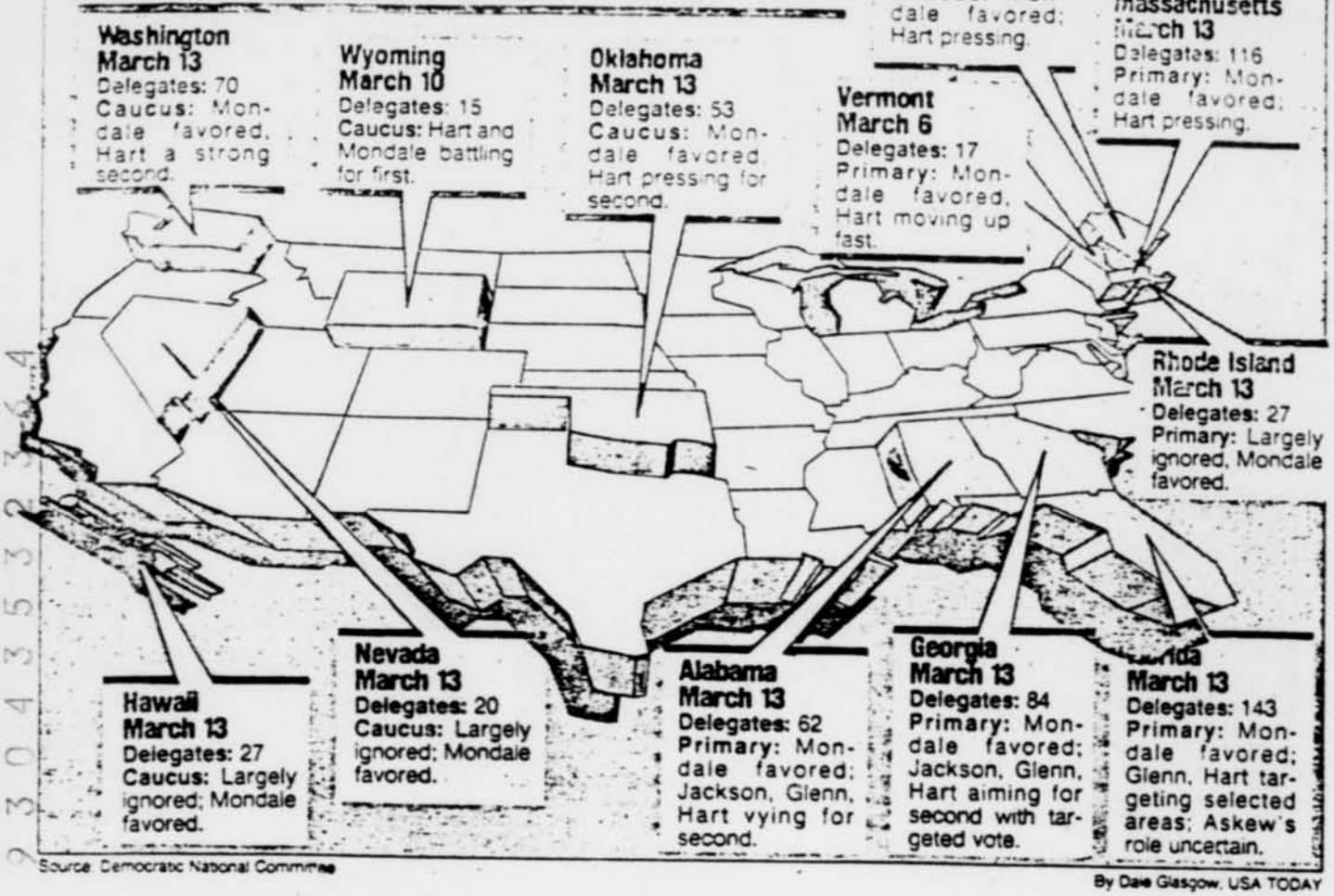
see over

9304335323663

And now. . . it's on to 'Super Tuesday'

With Tuesday's dramatic victory by Gary Hart in the New Hampshire primary, Walter Mondale faces unexpected competition in several of the 12 states holding primaries or caucuses leading up to and including Super Tuesday, March 13, when nine states select more than 600 delegates. Here is the early line:

Gary won!



Maine
March 4
Delegates: 27
Caucus: Mondale favored; Hart pressing.

Massachusetts
March 13
Delegates: 116
Primary: Mondale favored; Hart pressing.

Vermont
March 6
Delegates: 17
Primary: Mondale favored, Hart moving up fast.

Washington
March 13
Delegates: 70
Caucus: Mondale favored, Hart a strong second.

Wyoming
March 10
Delegates: 15
Caucus: Hart and Mondale battling for first.

Oklahoma
March 13
Delegates: 53
Caucus: Mondale favored, Hart pressing for second.

Rhode Island
March 13
Delegates: 27
Primary: Largely ignored, Mondale favored.

Hawaii
March 13
Delegates: 27
Caucus: Largely ignored; Mondale favored.

Nevada
March 13
Delegates: 20
Caucus: Largely ignored; Mondale favored.

Alabama
March 13
Delegates: 62
Primary: Mondale favored; Jackson, Glenn, Hart vying for second.

Georgia
March 13
Delegates: 84
Primary: Mondale favored; Jackson, Glenn, Hart aiming for second with targeted vote.

[illegible]orida
March 13
Delegates: 143
Primary: Mondale favored; Glenn, Hart targeting selected areas; Askew's role uncertain.

Source: Democratic National Committee

By Dale Glasgow, USA TODAY

9304353264

see over

STEIN BRIEF GROUP

February 24, 1984

9304353523655

Mr. Barry Brief
31821 South Coast Highway
Laguna Beach, California 92677

Dear Barry:

Thank you for attending the reception I hosted for Senator Gary Hart on February 12 at the Pacific Club and for your contribution of $1,000.

I am grateful for your help in making Gary's first event in Orange County in 1984 a success. Gary was very impressed and appreciative of our strong display of support for him, and he wants you to know that your contribution will help greatly in the upcoming presidential primaries.

Thanks again for your time and consideration.

Yours truly,

David Stein

DS:nss

cc: Gary Hart

29982 Ivy Glenn, Suite One Hundred • Laguna Niguel, CA 92677 • (714) 859-6995

February 24, 1984

Mr. Robert K. Stiens
6000 Garden Grove Boulevard, Suite 319
Westminster, California 92683

Dear Bob:

Thank you for attending the reception I hosted for Senator Gary Hart on February 12 at the Pacific Club and for your contribution of $100.

I am grateful for your help in making Gary's first event in Orange County in 1984 a success. Gary was very impressed and appreciative of our strong display of support for him, and he wants you to know that your contribution will help greatly in the upcoming presidential primaries.

Thanks again for your time and consideration.

Yours truly,

David Stein

DS:nss

cc: Gary Hart

29982 Ivy Glenn, Suite One Hundred • Laguna Niguel, CA 92677 • (714) 859-6995

9304353233666

STEIN BRIEF GROUP

February 24, 1984

Mr. Thomas W. Green
23221 S. Pointe Drive, Suite 101
Laguna Hills, California 92653

Dear Tom:

Thank you for attending the reception I hosted for Senator Gary Hart on February 12 at the Pacific Club and for your contribution of $250.

I am grateful for your help in making Gary's first event in Orange County in 1984 a success. Gary was very impressed and appreciative of our strong display of support for him, and he wants you to know that your contribution will help greatly in the upcoming presidential primaries.

Thanks again for your time and consideration.

Yours truly,

David Stein

DS:nss

cc: Gary Hart

29982 Ivy Glenn, Suite One Hundred • Laguna Niguel, CA 92677 • (714) 859-6995

9304353523367

9304353232368

February 24, 1984

Mr. James W. Smith
33391 Cockleshell Drive
Laguna Niguel, California 92677

Dear Jim:

Thank you for attending the reception I hosted for Senator Gary Hart on February 12 at the Pacific Club and for your contribution of $1,000.

I am grateful for your help in making Gary's first event in Orange County in 1984 a success. Gary was very impressed and appreciative of our strong display of support for him, and he wants you to know that your contribution will help greatly in the upcoming presidential primaries.

Thanks again for your time and consideration.

Yours truly,

David Stein

DS:nss

cc: Gary Hart

29982 Ivy Glenn, Suite One Hundred • Laguna Niguel, CA 92677 • (714) 859-6995

93043532369

February 24, 1984

Lucille Kuehn
1831 Seadrift Drive
Corona del Mar, California 92625

Dear Lucille:

Thank you for attending the reception I hosted for Senator Gary Hart on February 12 at the Pacific Club and for your contribution of $25.

I am grateful for your help in making Gary's first event in Orange County in 1984 a success. Gary was very impressed and appreciative of our strong display of support for him, and he wants you to know that your contribution will help greatly in the upcoming presidential primaries.

Thanks again for your time and consideration.

Yours truly,

David Stein

DS:nss

cc: Gary Hart

29982 Ivy Glenn, Suite One Hundred • Laguna Niguel, CA 92677 • (714) 859-6995

STEIN BRIEF GROUP

February 24, 1984

Mr. Ken Stuart
1758 Santa Ana Avenue
Costa Mesa, California 92627

Dear Ken:

Thank you for attending the reception I hosted for Senator Gary Hart on February 12 at the Pacific Club and for your contribution of $250.

I am grateful for your help in making Gary's first event in Orange County in 1984 a success. Gary was very impressed and appreciative of our strong display of support for him, and he wants you to know that your contribution will help greatly in the upcoming presidential primaries.

Thanks again for your time and consideration.

Yours truly,

David Stein

DS:nss

cc: Gary Hart

29982 Ivy Glenn, Suite One Hundred • Laguna Niguel, CA 92677 • (714) 859-6995

9304355323370

STEIN BRIEF GROUP

February 24, 1984

Mr. Thomas P. Davis
23751 Mariner Drive, #171
Laguna Niguel, California 92677

Dear Tom:

Thank you for attending the reception I hosted for Senator Gary Hart on February 12 at the Pacific Club and for your contribution of $125.

I am grateful for your help in making Gary's first event in Orange County in 1984 a success. Gary was very impressed and appreciative of our strong display of support for him, and he wants you to know that your contribution will help greatly in the upcoming presidential primaries.

Thanks again for your time and consideration.

Yours truly,

David Stein

DS:nss

cc: Gary Hart

29982 Ivy Glenn, Suite One Hundred • Laguna Niguel, CA 92677 • (714) 859-6995

9304353237 1

930435323372

February 24, 1984

Mr. Thomas F. Daly
425 N. West Street
Anaheim, California 92801

Dear Tom:

Thank you for attending the reception I hosted for Senator Gary Hart on February 12 at the Pacific Club and for your contribution of $50.

I am grateful for your help in making Gary's first event in Orange County in 1984 a success. Gary was very impressed and appreciative of our strong display of support for him, and he wants you to know that your contribution will help greatly in the upcoming presidential primaries.

Thanks again for your time and consideration.

Yours truly,

David Stein

DS:nss

cc: Gary Hart

29982 Ivy Glenn, Suite One Hundred • Laguna Niguel, CA 92677 • (714) 859-6995

9304355323773

February 24, 1984

Mr. John Hanna
3882 Hendrix Street
Irvine, California 92714

Dear John:

Thank you for attending the reception I hosted for Senator Gary Hart on February 12 at the Pacific Club and for your contribution of $50.

I am grateful for your help in making Gary's first event in Orange County in 1984 a success. Gary was very impressed and appreciative of our strong display of support for him, and he wants you to know that your contribution will help greatly in the upcoming presidential primaries.

Thanks again for your time and consideration.

Yours truly,

David Stein

DS:nss

cc: Gary Hart

29982 Ivy Glenn, Suite One Hundred • Laguna Niguel, CA 92677 • (714) 859-6995

93043532374

February 24, 1984

Mr. Harvey Englander
2721 Vista Knoll Road
Nohl Ranch, California 92667

Dear Harvey:

Thank you for attending the reception I hosted for Senator Gary Hart on February 12 at the Pacific Club and for your contribution of $100.

I am grateful for your help in making Gary's first event in Orange County in 1984 a success. Gary was very impressed and appreciative of our strong display of support for him, and he wants you to know that your contribution will help greatly in the upcoming presidential primaries.

Thanks again for your time and consideration.

Yours truly,

David Stein

DS:nss

cc: Gary Hart

29982 Ivy Glenn, Suite One Hundred • Laguna Niguel, CA 92677 • (714) 859-6995

STEIN BRIEF GROUP

February 24, 1984

930435323715

Mr. Bernie Schneider
P.O. Box 4133
Laguna Beach, California 92651

Dear Bernie:

Thank you for attending the reception I hosted for Senator Gary Hart on February 12 at the Pacific Club and for your contribution of $250.

I am grateful for your help in making Gary's first event in Orange County in 1984 a success. Gary was very impressed and appreciative of our strong display of support for him, and he wants you to know that your contribution will help greatly in the upcoming presidential primaries.

Thanks again for your time and consideration.

Yours truly,

David Stein

DS:nss

cc: Gary Hart

29982 Ivy Glenn, Suite One Hundred • Laguna Niguel, CA 92677 • (714) 859-6995

GARY HART

November 10, 1986

Dear Friend:

Next week, hundreds of supporters of Senator Gary Hart across the nation will be gathering to celebrate his 50th birthday. They will also be using this occasion to begin making plans in their congressional districts for a potential 1988 presidential campaign by Senator Hart.

Senator Hart is retiring from the Senate after twelve years of service. He will not, however, be retiring from the national scene. In all recent polls, Gary has stood at the top of the list for possible Democratic nominees for the presidency in 1988. Although Gary has not announced his intentions, an exploratory committee, "Friends of Gary Hart", has been established on his behalf.

Please join us and other Hart supporters in Orange County on Wednesday, November 19, at 7:00 PM at Tiny's Restaurant in Santa Ana as we celebrate Gary's birthday and discuss plans for the exploratory committee. Light hors d'oeuvres and a "no host" bar will be provided.

Tiny's Restaurant is located at 2660 N. Main St. in Santa Ana, just north of the Santa Ana Freeway. Please RSVP to Winnie Peterson or June Santee at (714) 859-6995.

We look forward to seeing you on the 19th!

David Stein Stuart Karl Bernie Schneider Chris Townsend

P.S. If you cannot attend the meeting but want to be involved with the exploratory committee, please call us!

9304355237 6

Paid for by AMERICANS WITH HART

FRIENDS OF
GARY HART
1988

RSVP yes. Ask how long meeting will be expected to last?

February 4, 1987

Mr. David Stein
Stein-Brief
29982 Ivy Glenn Drive
Laguna Niguel, California 92677

Dear David:

On February 12, Eli Segal, the National Finance Director of the Friends of Gary Hart 1988, will be in Los Angeles. Eli asked me to invite you to join a small group (approximately 10) of Gary's friends to discuss the national fundraising picture, and to plan the fundraising activities which will take place in southern California in connection with Hart's anticipated announcement of candidacy, now being considered for mid-April. The meeting will be at 8:00 p.m. at my office in Beverly Hills (a map is attached) and should last one and one-half hours. Dinner will be served.

We hope you can join us, to continue to provide the Campaign with your counsel, and particularly to move forward on our major kickoff event in April. Please RSVP to our Finance Coordinator, Shelia Davis, at (213) 826-6737, or to me at (213) 275-9700. Since this will be a working meeting, it would be helpful if you could bring your list of potential table buyers/sellers with you, so we can accurately evaluate our prospects for April.

Very truly yours,

Rick

C. Richard Allen

CRA:eh
Enclosure

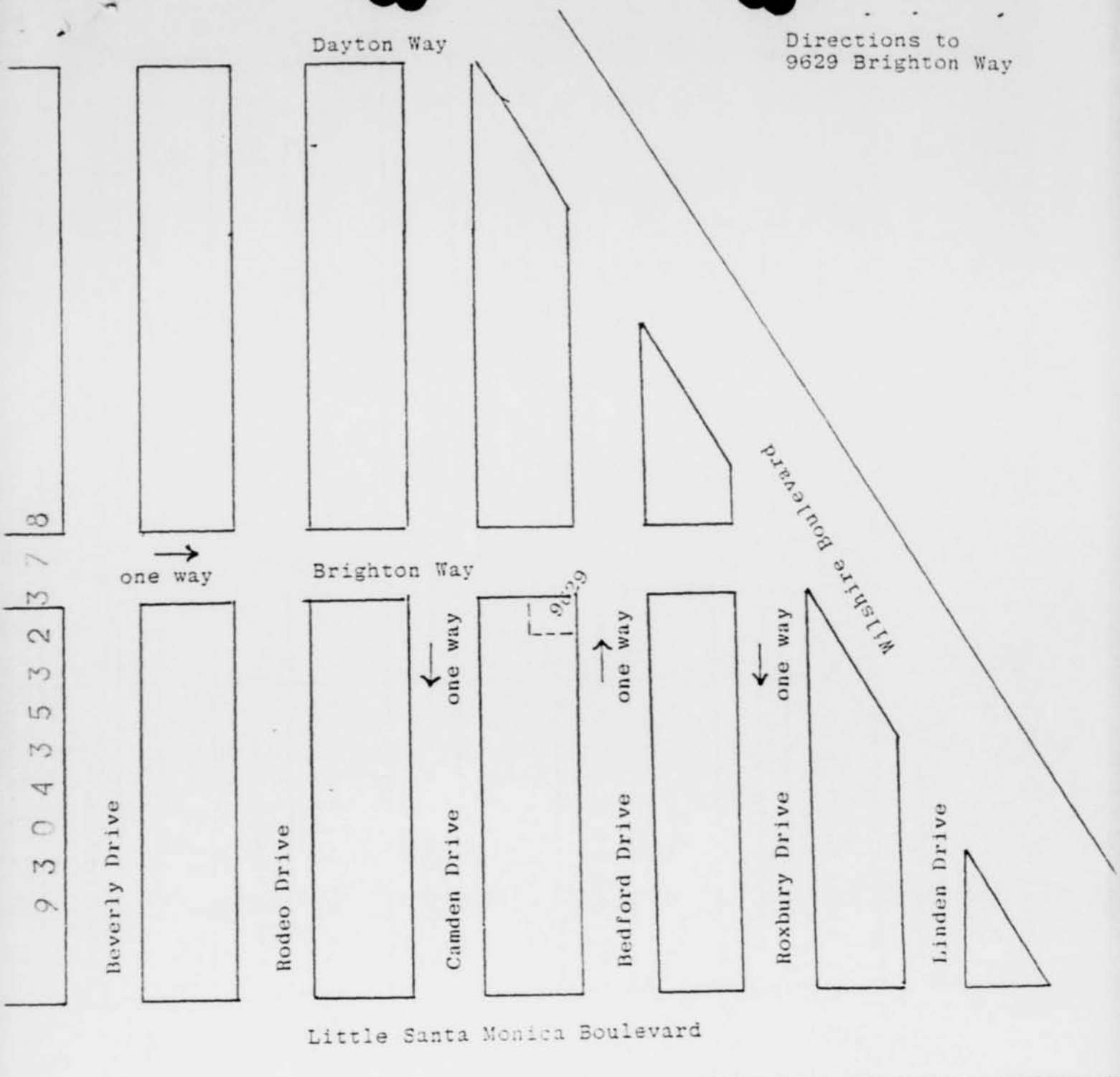
David— This was the letter I wanted to review w/ you. We hit a time crunch, so I just sent it out. Please call me, at your convenience.
Rick

RECEIVED
FEB 09 1987
DAVID STEIN

1600 DOWNING STREET
DENVER, COLORADO 80218
(303) 894-1988

Paid for by Friends of Gary Hart 1988

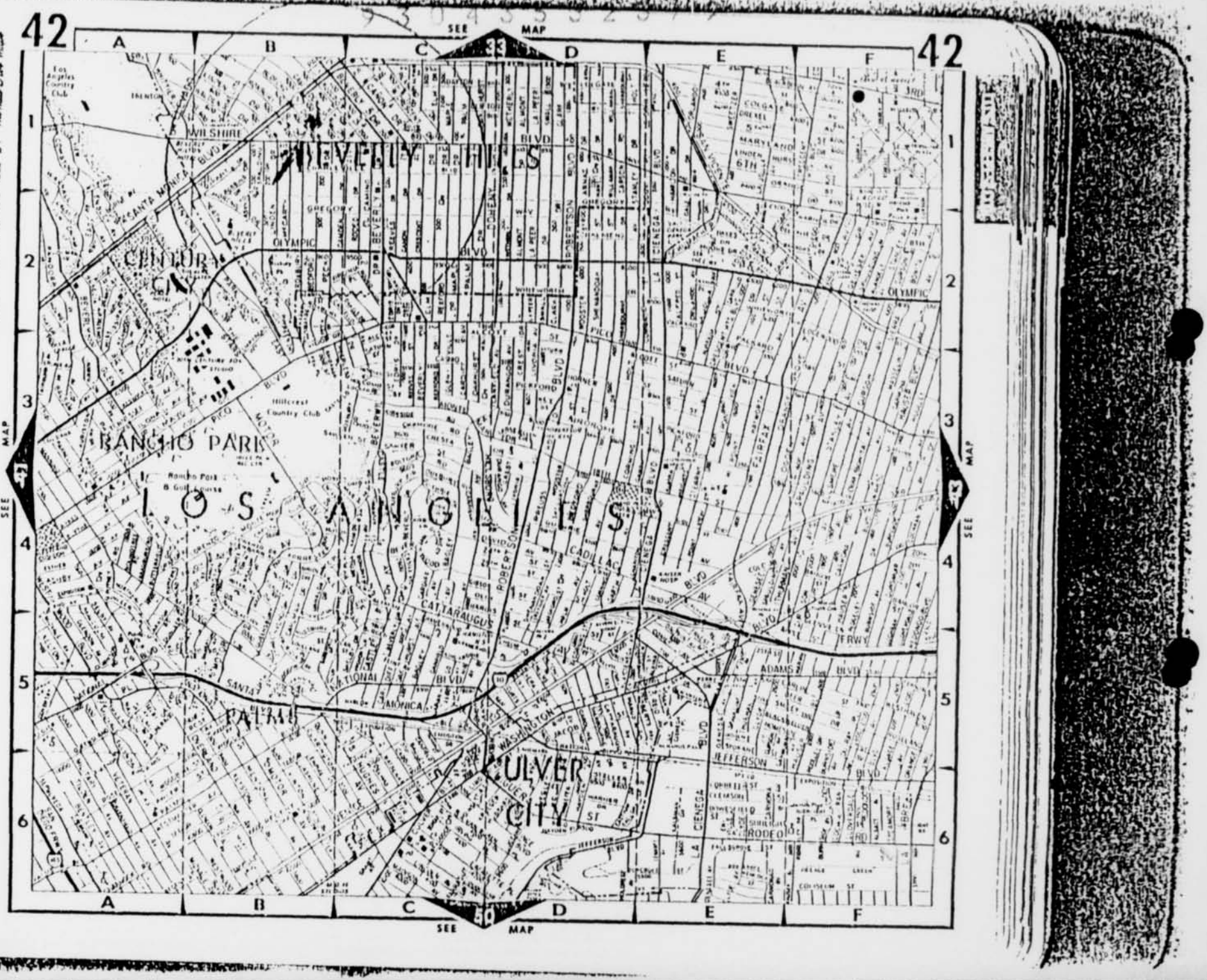
9304355323777



To get into the Parking Garage for 9629 Brighton Way:

Take Little Santa Monica to Bedford, turn toward Wilshire
Parking entrance is last driveway on left before
Brighton Way (enter under one-story red brick
building).

PTMC office is on second floor.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BEVERLY HILLS
CENTURY CITY
OLYMPIC BLVD
RANCHO PARK
LOS ANGELES
CATTARAUGUS
SANTA MONICA BLVD
PALMS
CULVER CITY
WASHINGTON BLVD
JEFFERSON BLVD
ADAMS BLVD
ROBERTSON BLVD
CADILLAC
LA CIENEGA BLVD
RODEO
COPYRIGHT © 1985 BY Thomas Bros. Maps

FRIENDS OF
GARY
HART
1988

February 27, 1987

Mr. David Stein
Stein-Brief
29982 Ivy Glenn Drive
Laguna Niguel, California 92677

Dear David:

Thank you for joining us for our recent meeting with Eli Segal, the National Finance Director of the Friends of Gary Hart. We've taken the suggestions advanced with regard to the April 15, 1987 Campaign kick off in Los Angeles, and have arranged the following events:

1. A reception at the home of Marvin Davis from 6:30 to 8:00 p.m.; ticket price: $1,000/person; co-hosted by Warren Beatty and most probably by Barbra Streisand; artificially limited to no more than 100 attendees (no comps); closed to the press.

2. A rally/reception in the Blossom Room of the Hollywood Roosevelt Hotel (scene of the first Academy Awards, which for this event will be decorated as a Convention Hall); 6:30 to 10:00 p.m.; $100 per couple; entertainment by a hot young comedian and by Billy and the Beaters (Los Angeles' hottest band, with a current number one record in the national Top 40); this event will be open to the press (because it is the first major event after announcement, we must anticipate significant national press coverage) and we must have 500 to 1,000 attendees.

Although I am obviously pleased by how things are developing, we clearly are really going to need your help. I've asked Shelia Davis, our Finance Coordinator, to call you early next week to determine how many attendees you think you'll be able to arrange for each of the events.

Now that Governor Cuomo and Senator Nunn have dropped out of the race, this Campaign is accelerating at a phenomenally rapid rate. It is so essential that we take maximum advantage of this important momentum to launch the national and California campaigns in the most successful manner.

I look forward to working with you on these events.

Very truly yours,

Dick

C. Richard Allen

CRA:scc

David -
This is the follow up
letter I mentioned.
R

RECEIVED
MAR 02 1987
DAVID STEIN

1600 DOWNING STREET
DENVER, COLORADO 80218
(303) 894-1988

Paid for by Friends of Gary Hart 1988

9304353523380

THE VOLUNTEER COMMITTEE

September 8, 1986

Mr. David Stein
Stein Brief Group
29982 Ivy Glenn
Laguna Niguel, CA 92677

Dear David,

You've probably heard from Gary regarding his Volunteer Committee, established to help candidates this year throughout the country. Already, thousands of Hart volunteers have been recruited to provide "people power" for 1986. Gary will be spending every weekend and the entire month of October campaigning in thirty states on behalf of seventy candidates seeking public office. Of course, this travel and assistance costs money. Gifts to Americans With Hart are being protected to retire the debt (so far we have gone from $4.8 to $2.6 million in a year and a half). Thus, funds cannot come from that source for 1986 activity.

We critically need to raise $30,000 in the next few weeks to meet all present needs. Gary has placed the same restrictions on these gifts as on Americans With Hart -- no PAC funds are accepted and contributions are limited to a thousand dollars per person (ie. one thousand from a husband and one thousand from a wife, etc.).

Can you help? If so, we would be most grateful.

Sincerely,

Michael P. Novelli
Chief Financial Officer

9304353238 1

RECEIVED
SEP 11 REC'D
DAVID STEIN

The Volunteer Committee, 122 C Street, NW, Suite 360 • Washington, DC 20001
202/879-7730

GARY HART
WASHINGTON, D.C.

September 26, 1986

Mr. David Stein
Stein Brief Group
29982 Ivy Glenn
Laguna Niguel, CA 92677

Dear David,

We want to ask for your help on one of the most important projects of the next two years. Within a few weeks, in mid-November, an exploratory committee for the 1988 Presidential race will be opened on Gary's behalf. With this committee we will be able to offer Gary the necessary tools needed to make an informed decision on 1988.

Should Gary decide to run, the exploratory committee will become the core of the campaign committee for a Hart 1988 Presidential campaign. The establishment of the exploratory committee could well be the first step on a road which ultimately leads to the White House.

Many here in Washington will view the committee as the nucleus of a Hart 1988 Presidential bid, and they will look closely at the amount of funds it raises in the days after its formation. It is in this area that we ask for your critical help.

On November 10th and 11th we will engage in a massive project to call 2,000 people and solicit them for funds to the exploratory committee. We ask you, as a trusted friend and long-time supporter, to join with us in this project. We will supply you with names to be called (your suggestions and additions are welcome) and with an organization to help your efforts. We need you, though, to make this project work.

If you are willing to commit two days for placing and completing 25 solicitation calls, this project will be a success. We know we are asking for considerable assistance. If you feel you do not have the time, tell us now. You have been there for Gary in the past, and we know you will help in the future.

We hope you will join us in this project. This is the critical beginning of the momentous steps to be taken in the next two years.

Sincerely,

Michael P. Novelli
Chief Financial Officer

William P. Dixon
Administrative Assistant

RECEIVED
OCT 1 REC'D
DAVID STEIN

P.O. Box 75356, Washington, D.C. 20013 • (202) 879-HART

9304353382

HOLD

STEIN-BRIEF GROUP

MEMORANDUM

To: David Stein, Rick Reiter

From: Chris Townsend

Subject: Conversation with Jim Barrett

Date: May 17, 1986

Jim Barrett called me to relay the following update to you on his efforts to retire the GWH debt by the end of summer.

To date Jim claims to have received approximately over $420,000 in fundraising pledges from the following individuals at responsibility of $30,000 per person:

BOB DECOTIIS
BILL BROADHURST
SMITH BAGLEY
BOB PATRICK
FRED LEVINE
JIM CALLOWAY
DON MONTGOMERY
JIM BARRETT
AL GERSTON
GARY ILER
BUDDY TEMPLE
CHUCK MANAT (90% Confirmed)
SIDNEY HAMM (90% Confirmed)
LUTHER HODGES ($10,000 only)
DOUG ROSEN (Soft)

Barrett says he will delay confirming your commitment to the program until your business situation is resolved. He sent his best wishes and remarked that GWH had asked him again if he could be sure to assist you in any way possible.

Barrett also wanted you to be aware of the following items:

9304353238383

20962 Ira Glenn
Laguna Niguel, CA 92677
714-659-6005

--GWH has secured a position in a Denver law firm that will sponsor him from January 1987 through January 1988. The same law firm will also sponsor Elsie Vance.

--Jim has secured a bank that will provide funding for the 1988 presidential campaign operation during 1987 and early 1988.

--A final retreat for debt retirement (specifically with regard to the Barrett program), will be held in Minnesota during the weekend of July 18, 19 and 20.

9304353233834

CT:1

JOHN B. EMERSON
1988 CENTURY PARK EAST
TWENTY FIRST FLOOR
LOS ANGELES, CALIFORNIA 90067
TELEPHONE (213) 556-5569

RECEIVED
MAY 25 1983
DAVID STEIN

May 19, 1983

Mr. David Stein
Stein-Brief Group
29982 Ivy Glen, Suite 100
Laguna Niguel, California 92677

Dear Dave:

I would like to invite you to join Mike Medavoy, Robert Foxworth, Donna Mills and many others at a cocktail reception on Wednesday, June 8 from six to eight p.m. honoring U.S. Senator Gary Hart, Democratic Presidential Candidate. The event will be at the home of Richard Trugman, 910 No. Crescent Drive, Beverly Hills.

Senator Hart's campaign needs your assistance now. This campaign has an extremely important message to carry to the people of this country. Our nation is at an historical crossroad. Our environment, our industries, our children and our efforts for peace need dramatic and intelligent leadership for us to move forward as a civilized people.

I support Gary Hart because he has no fear of the future. He knows we must move ahead rather than retreat. He is the person who has the vision, the youth, the compassion, the understanding and the practicality to pull us together in an effort unparalleled in our recent history.

In order to be successful in this effort, we need to raise substantial funds so that the American people will have the opportunity to hear Senator Hart.

The Senator refuses to accept influential PAC money from the special interest and corporate PAC's in order not to be obligated to anyone except the people. Because of this decision, he urgently needs money from us so that he can be heard.

The cost of this event is $500 per person. If you have already given the legal limit ($1000 per person) please raise the money from your friends.

9304355323385

Please R.S.V.P. to me at (213) 556-5569 and let me know that we can count on your support.

Very truly yours,

John B. Emerson
California Coordinator
Americans With Hart

JBE:veg

Dave -
We really need
help here - a big push
before the end of June.
Thanks - JE

9304335323886

RONALD C. LAZOF
C. BRENT SWANSON
THOMAS A. GRECO
JAMES H. CASELLO
TERRY R. DOWDALL
GARY B. ROSS
RICHARD M. BLUMENTHAL
RICHARD J. REYNOLDS
FREDERICK E. TURNER
PAULA C. MATOS
C. ROBERT JAMESON
MARK A. HILLER
EDWARD G. COSS
C. BRUCE TEETER
JOHN A. CONE, JR
ERIC P. LAMPEL
SHEILA PATTERSON
ROBERT J. MASON
KEITH A. ROSENBAUM
DEBRA H. LEWIS
WILSON B. HART
FELICIA S. KASSEL

LAZOF AND SWANSON
ATTORNEYS AT LAW
A PROFESSIONAL CORPORATION
P. O. BOX 15713
203 NORTH GOLDEN CIRCLE DRIVE
SECOND FLOOR
SANTA ANA, CALIFORNIA 92705
TELEPHONE (714) 973-1700

95 SOUTH MARKET STREET
SUITE 300
SAN JOSE, CALIFORNIA 95113
(408) 280-6565

1496 AVOCADO ROAD
OCEANSIDE, CALIFORNIA 92054
(619) 436-2055

TELECOPIER: (714) 973-6955

PLEASE REPLY TO SANTA ANA

OUR FILE NO._____

May 21, 1984

9304353238 7

Chris Townsend
David Stein
Stein-Brief Group
29982 Ivy Glenn Dr.
Laguna Niguel, CA 92677

Gentlemen:

I am sending my check in the amount of $1,000.00 payable to the campaign of Gary Hart for the Presidency of the United States.

I understand that there will be a gathering at David's home on the night of May 31 which Senator Hart will attend. Unfortunately, I will be out of town. I would like, however, to send Dan Miller in my place. His phone number is 834-3110.

Thank you.

Very truly yours,

Wilson B. Hart

Wilson B. Hart

WBH/eg
Enclosure

GARY HART
WASHINGTON, D.C.

August 28, 1985

Mr. David Stein
Stein / Brief Group
29982 Ivy Glen
Laguna Niguel, CA 92677

Dear David,

Once again, Senator Hart greatly appreciates your assistance with his Harriman fundraiser. It promises to be a splendid evening.

Although details have been discussed to some degree, the following information should be kept in mind:

1. Date: October 8th, 1985

2. Time: 7:30 PM

3. Place: The Harriman home, 3038 N Street, NW

4. Price: $500 per person
   $5,000 per table

5. Goal: $200,000

6. Checks may be made out to either:
'Americans with Hart, Inc.' or
'Hart for Senate Campaign Committee, Inc.'

Also, on September 11th, at noon, Senator Hart is hosting a luncheon for the dinner committee and a few friends at the Sheraton Grand Hotel in Washington. While the atmosphere will be casual, we are planning a few short presentations by the Senator and his staff. Stephen Bowman will be calling to provide further information and to take your reservation.

If you have any immediate questions, please do not hesitate to call. I hope that you will be able to join us.

Sincerely,

Michael P. Novelli
Chief Financial Officer

RECEIVED
[illegible]
DAVID STEIN

122 C Street, N.W., Suite 360, Washington, D.C. 20001 • (202) 879-HART

9304355323388

GARY HART
WASHINGTON, D.C.

August 27, 1985

Mr. David Stein
Stein / Brief Group
29982 Ivy Glen
Laguna Niguel, CA 92677

Dear David,

Your willingness to serve on tne dinner committee of my Harriman fundraiser is greatly appreciated. This will be my most important event of the year and your assistance will be essential.

Stephen Bowman is coordinating tne event for me and will call soon to offer nis services and answer any further questions you may nave.

Once again, I thank you.

Sincerely,

Gary Hart

RECEIVED
1985
DAVID STEIN

9304353239389

122 C Street, N.W., Suite 360, Washington, D.C. 20001 • (202) 879-HART

AMERICA WITH HART
122 C ST NW SUITE [redacted]
WASHINGTON DC 20001 23AM

Western Union Mailgram

1-0056124266 09/23/85 ICS IPMWGWC WSH SNAA
01636 MGM WASHINGTON DC 74 09-23 1051A EDT

MR. DAVID STEIN
STEIN BRIEF GROUP
29982 IVY GLEN
LAGUNA NIGUEL CA 92677

DEAR DAVID

AS YOU KNOW, THE HARRIMAN DINNER MIGHT BE THE MOST IMPORTANT WASHINGTON FUNDRAISING EVENT SINCE THE CAMPAIGN OF LAST YEAR. I REALLY NEED YOU TO PUSH HARD ON MY BEHALF. IN THE PRESENCE OF THE NATIONAL PARTY AND NATIONAL MEDIA, IT IS ESSENTIAL THAT WE MAKE A STRONG SHOWING.

ALL OF YOUR EFFORT ON THIS EVENT ARE DEEPLY APPRECIATED.

SINCERELY,

GARY

10:41 EST

MGMCOMP

|9304335323390|

5241 (R 7/82)

TO REPLY BY MAILGRAM MESSAGE, SEE REVERSE SIDE FOR WESTERN UNION'S TOLL - FREE PHONE NUMBERS

BLACK, MANAFORT, STONE, & KELLY
PUBLIC AFFAIRS COMPANY
324 NORTH FAIRFAX STREET
ALEXANDRIA, VIRGINIA 22314

(703) 683-6612

File: Hart Debt Retirement

September 16, 1985

Mr. David Stein
President
Stein-Brief Group, Inc.
29982 Ivy Glenn
Suite 100
Laguna Niguel, CA 92677

Dear David:

Gary Hart faces the double task of dealing with a sizeable Presidential deficit from 1984 and, if he should opt to seek reelection, funding a Senate Campaign in 1986. It is not a position which any of us would enjoy. To his credit, Gary is dealing with the situation with great determination.

I have joined with several of our mutual friends in an effort to deal with this difficult situation and enable Gary to deal with the future a bit more unfettered than today.

Hence, I ask that you join with us at a Dinner-Dance at the home of Governor and Pamela Harriman, 3038 N St., N.W., Washington, D.C. on Tuesday, October 8, 1985. Details are set forth in the enclosed invitation. I believe you will find dozens of good friends in a magnificent setting for a cause which we can all easily understand and support.

I will give you a call within the next two weeks.

Best regards.

Sincerely,

PETER G. KELLY

Enclosure

9304353239

GARY HART
WASHINGTON, D.C.

August 7, 1985

Mr. David Stein
Stein Brief Group
29982 Ivy Glenn
Lagvna Nigvel, LA 92677

Dear David,

Senator Hart is very pleased that you are willing to assist with his October 8th fundraiser at the Harriman home. We hope to make this our most successful event of 1985 and your assistance clearly will be invaluable.

We have arranged to have Stephen Bowman direct the event for us. He shall call in the near future to provide additional information and offer his services to you.

If you need anything from me, or wish to meet with the Senator privately before the event, please let me know.

Once again, thank you.

Respectfully,

Michael P. Novelli
Chief Financial Officer

P.S. Received your note. Thanks for everything. I'm sending you a list of California contributors that are potential hosts. Stay in touch

M.

RECEIVED

DAVID STEIN

122 C Street, N.W., Suite 360, Washington, D.C. 20001 • (202) 879-HART

9304355323922

File: Hart debt retirement

GARY HART
WASHINGTON, D.C.

July 30, 1985

Mr. David Stein
Stein Brief Group
29982 Ivy Glenn
Laguna Niguel, CA 92677

Dear David,

Some of us who met in Vail two weekends ago agreed to come to Wasnington for the purpose of formulating a plan to retire Gary's debt by the end of December. We will meet on Thursday, August 8th at 9:00 A.M. in the conference room of Ray Strother's office wnicn is located at 308 East Capitol Street, suite 800.

Although Gary will not be in Wasnington, he asked that I invite you and otner key people to join myself, Bill Dixon, Mike Novelli, and the finance staff as we explore new and alternative options for clearing the debt. At present, we are looking at four different programs, and we are asking you to adopt one of them to meet a commitment of $35,000 by December 31st.

I also would like you to bring a cneck (or checks) in the amount of $5,000 made payable to the Democratic National Committee. The Committee will, in turn, be asked to assist in reducing our outstanding liabilities. In the event that you cannot attend, please send your check to Mike Novelli at Americans with Hart. If we are unable to obtain this assistance from the DNC, your check will be returned to you.

Gary hopes that you will be able to come and give your support to getting over this hurdle before the beginning of 1986. We need your help, and want you to be a part of the team.

Sincerely,

Jim Barrett

Jim Barrett

P.S. Please RSVP to: Jim Barrett: 405/848-3531

9304353233933

GARY HART
COLORADO

UNITED STATES SENATE
WASHINGTON, D. C.

December 20, 1984

Mr. David Stein
Stein Brief Group
29982 Ivy Glenn Drive
Laguna Niguel, CA 92677

Dear David,

I want you to know how much I appreciate all the work you put in as a member of the Host Committee for our brunch last Sunday.

Debt retirement is neither the most glamorous nor the easiest form of fund-raising. Having good and loyal friends such as yourself, though, makes our task a great deal easier.

Lee and I hope the holidays bring you great joy and the New Year much success in your own projects. Again David, thanks for your friendship, your support and all your help.

Sincerely,

Gary Hart

SORRY TO HAVE MISSED YOU, DAVID. THANKS FOR EVERYTHING IN 84.

93043532394

AMERICANS WITH HART
311 MASSACHUSETTS AVE NW
WASHINGTON DC 20002 10AM

Western Union Mailgram

1-257029U284004 10/10/84 ICS WA16514 SNAA
01161 MLTN VA 10/09/84

DAVID STEIN
STEIN BRIEF GROUP
29982 IVY GLENN
LAGUNA NIGUEL CA 92677

DEAR DAVID,

I NEED YOUR HELP IN DEVELOPING AND IMPLEMENTING A STRATEGY TO ELIMINATE THE CAMPAIGN DEBT. WITH YOUR HELP I AM COMPLETELY CONFIDENT WE WILL SUCCEED. WE THEN CAN MOVE ON TO FUTURE ENDEVOURS.

I HOPE YOU WILL MEET WITH ME AND JIM BARRETT MY NATIONAL FINANCE CO-CHAIR ON OCTOBER 17TH FROM 5-7PM AT MIKE MEDAVOY'S HOME: 1451 NORTH AMALFI DRIVE, PACIFIC PALISADES. YOUR PARTICIPATION IS ESSENTIAL TO ME. I WILL BE FOREVER GRATEFUL FOR YOUR ASSISTANCE.

DOUG ROSEN WILL CALL YOU TODAY TO FIRM UP DETAILS. (212)759-4588

THANK YOU.

GARY HART

09795

09:00 EST

MGMCOMP

RECEIVED
OCT 1 1 84
DAVID STEIN

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GWH

STEIN-BRIEF GROUP

MEMORANDUM

To: David Stein

From: Christopher Townsend

Subject: GARY HART FINANCE COUNCIL CODE

Date: March 17, 1987

I spoke on the phone with Weston Frank, who handles the Finance Council accounts for Friends of Gary Hart in Denver, regarding your code. The Finance Council code for David Stein is:

FC CA 12

This code should be written in the lower corner (preferably on the memo entry line) of any and all checks that we submit. In addition, if the checks are collected in conjunction with an event we have organized, we should also include our event code which would be assigned to us at the time of the event.

If you have any questions, please contact me or Weston Frank directly at (303) 894-1988.

cc: Rick Reiter

9304353239 96

[illegible]

June 5, 1984

Mr. Doug Rosen
"Americans With Hart"
7265 Franklin Avenue
Los Angeles, CA 90046

Dear Doug:

On behalf of Mr. David Stein of the Orange County Hart Campaign, enclosed please find a schedule of contributions and checks totalling $1,215.00 payable to "Americans With Hart". Copies will also be sent to your Washington D.C. and Denver offices.

We request that the total amount be credited to the National Finance Committee account of David Stein (Code #CAFC02).

If you have any questions, or desire additional information, please feel free to contact me.

Yours truly,

Chris Townsend
Director of Public Affairs

CT:pt
Enclosures
cc: John Emerson

29082 Ivy Glenn, Laguna Niguel, CA 92677 • (714) 8500805

AMERICANS WITH HART
SCHEDULE OF CONTRIBUTIONS
RAISED IN ORANGE COUNTY
CREDIT TO DAVID STEIN
CODE #CAFC02

Name	Amount
Eugene & Mae Vitamanti	$ 15.00
Donald & Judy Solsby	200.00
B.J. Willits	1,000.00
TOTAL	$1,215.00

93043553239 8

DONALD L. SOLSBY
JUDY W. SOLSBY
[redacted]
3415 QUIET COVE
CORONA DEL MAR, CA 92625

CAFCO2 164

May 30 1984 16-2607/1222

PAY TO THE ORDER OF Americans With Hart $200.00

Two hundred + 00/100 DOLLARS

MITSUI MANUFACTURERS BANK
ONE NEWPORT PLACE
1301 DOVE STREET
NEWPORT BEACH, CALIFORNIA 92660

MEMO [redacted]

EUGENE VITAMANTI
R. MAE VITAMANTI
[redacted]
2113 N MOODY AVE.
FULLERTON, CA 92631

CAFCO2 1162

5-31-84 90-3175/1222

Pay to the Order of Americans with Hart $ 15.00

Fifteen and no/100 Dollars

TO California Teachers Federal Credit Union
1905 East 17th Street, Suite 101
Santa Ana, California 92701
PAYABLE THROUGH SOUTHWEST BANK, VISTA, CALIFORNIA 92083

[redacted] Eugene Vitamanti

B. J. WILLITS
1114 WHITE SAILS WAY [redacted]
CORONA DEL MAR, CA 92625

CAFCO2 302

June 4 1984 90-7101/3222

PAY TO THE ORDER OF Americans with Hart $1,000.00

One thousand and 00/100 DOLLARS

Great American Federal
SAVINGS AND LOAN ASSOCIATION
5 Corporate Plaza Dr.
Newport Beach, California 92660

MEMO [redacted] B.J. Willits

930435323999

STEIN BRIEF GROUP

June 1, 1984

Ms. Liza Mientus
"Americans With Hart"
507 8th Street, S.E.
Washington, D.C. 20002

Dear Liza:

On behalf of Messrs. David Stein, Bernie Schneider, and Stuart Karl of the Orange County Hart Campaign, enclosed please find a schedule of contributions and checks totalling $14,250.00 payable to "Americans With Hart". Copies will also be sent to your Denver office.

We request that the total amount be credited to the National Finance Committee account of David Stein (Code #CAFCO2).

Again, according to our records the campaign still has not made payment in the amount of $1,693.96 for bus transportation to the Carole King Concert. Please resolve this matter as soon as possible.

If you have any questions, or desire additional information, please feel free to contact me.

Yours truly,

Chris Townsend
Director of Public Affairs

CT:pt
Enclosures
cc: John Emerson
Doug Rosen

29082 Ivy Glenn, Laguna Niguel, CA 92677 • (714) 559-0965

AMERICANS WITH HART
SCHEDULE OF CONTRIBUTIONS
RAISED IN ORANGE COUNTY
CREDIT TO DAVID STEIN
CODE #CAFC02.

Name		Amount
Mert Wallen		$ 250.00
Richard & Winnifred Peterson		100.00
Courtland P. Paul		100.00
Tzuo & Lucia Su		100.00
Michael Ray		1,500.00
Gerald & Nadine Levinson		2,000.00
John & Dana Saxten		2,000.00
Shannon Dunnam		1,000.00
Daniel & Judy Griset		1,000.00
Audrey Bunnell		1,000.00
James & Jason McNeil		1,000.00
Gayle Bennett		1,000.00
Terry & Argie Cupples		1,000.00
Morris Skenderian		200.00
David Robinson		400.00
Shirlee Fonda		1,000.00
Edward Taub		500.00
Juan Avilla		100.00
	TOTAL	$14,250.00

2304353240 1

STEIN BRIEF GROUP

May 31, 1984

Ms. Liza Mientus
"Americans With Hart"
507 8th Street, S.E.
Washington, D.C. 20002

Dear Liza:

On behalf of David Stein, of the Orange County Hart Campaign, enclosed please find checks and photocopies totalling $10,000.00 payable to "Americans With Hart".

If you have any questions, or desire additional information, please feel free to contact me.

Yours truly,

Chris Townsend

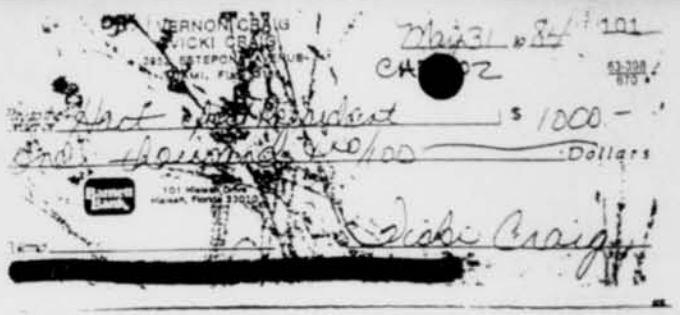
Chris Townsend
Director of Public Affairs

CT:pt
Enclosures
cc: John Emerson
Doug Rosen

ORANGE COUNTY
AMERICANS WITH HART
SCHEDULE OF CONTRIBUTIONS

Name	Amount
Tammy Turner	$ 1,000.00
Dawn White	1,000.00
Tom & Lynette Bennett	1,000.00
Alfred & Beverly Tretta	1,000.00
Claud & Joan Kelly	1,000.00
Jack & Angela Fritts	1,000.00
Dan Campbell	1,000.00
William & Florence Wise	1,000.00
Thomas Dionne	1,000.00
Vernon & Vicki Craig	1,000.00
TOTAL	$10,000.00

9304353240 3



VERNON CRAIG
VICKI CRAIG
101 Hialeah Drive
Hialeah, Florida 33010

May 31 84 101

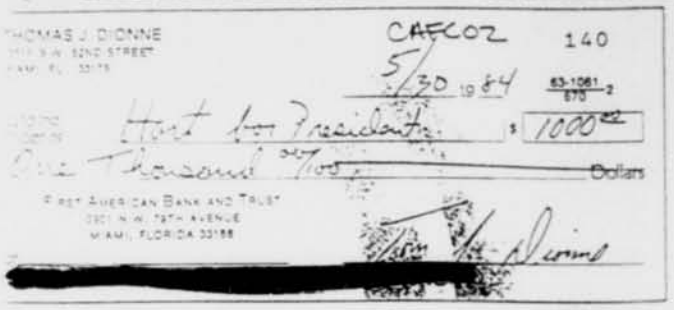
CAFCO2 63-208/670

Craig for President $ 1000 -

One thousand and no/100 Dollars

Vicki Craig

[redacted]



THOMAS J. DIONNE
[redacted] SW 92ND STREET
MIAMI, FL 33176

CAFCO2 140

5/30 1984 63-1061/670

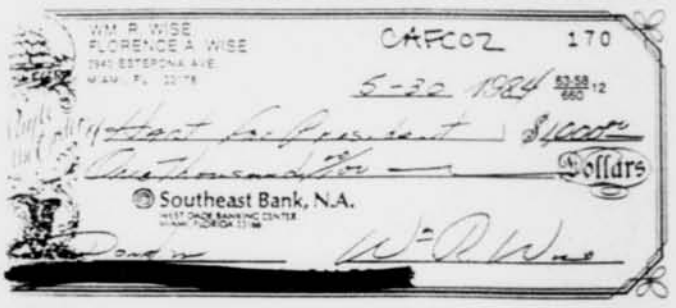
Hart for President $ 1000 00

One Thousand and no/100 Dollars

FIRST AMERICAN BANK AND TRUST
3501 N.W. 79TH AVENUE
MIAMI, FLORIDA 33166

Thomas J. Dionne

[redacted]



WM. R. WISE
FLORENCE A. WISE
7941 ESTEPONA AVE.
MIAMI, FL 33176

CAFCO2 170

5-22 1984 63-58/660

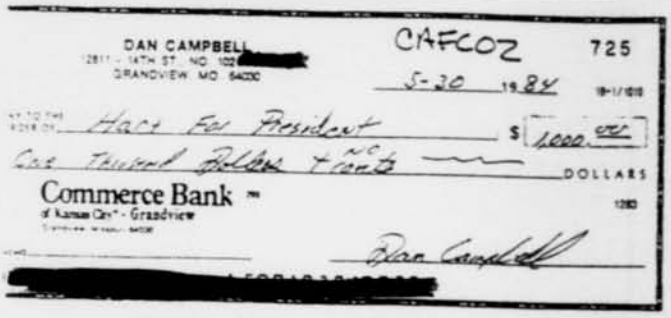
Hart for President $1000.00

One thousand and no Dollars

Southeast Bank, N.A.
FIRST UNION BANKING CENTER
MIAMI, FLORIDA 33131

Wm R Wise

[redacted]



DAN CAMPBELL
2811 - 14TH ST. NO. 102 [redacted]
GRANDVIEW, MO 64030

CAFCO2 725

5-30 1984 10-11/1010

Hart For President $ 1000.00

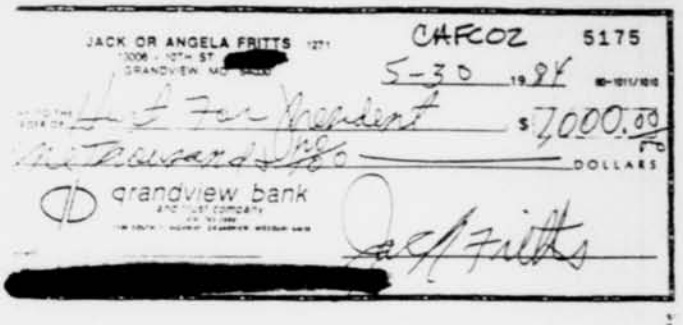
One Thousand Dollars and no/100 DOLLARS

Commerce Bank
of Kansas City - Grandview

1010

Dan Campbell

[redacted]



JACK OR ANGELA FRITTS
[redacted] 107th ST.
GRANDVIEW, MO [redacted]

CAFCO2 5175

5-30 1984 10-1011/1010

Hart For President $ 1,000.00

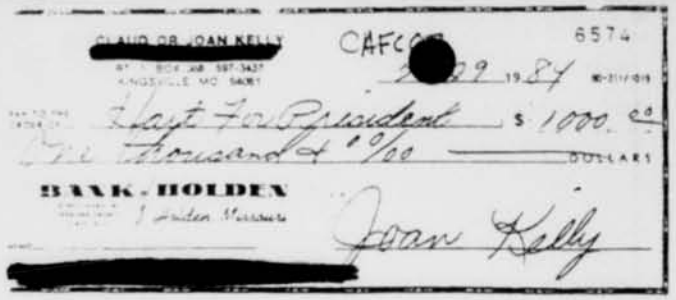
One Thousand and no/100 DOLLARS

grandview bank
AN FIRST COMPANY

Jack Fritts

[redacted]

9304353224 04



CLAUD OR JOAN KELLY
[redacted]
KINGSVILLE MO 64061

CAFCOZ 6574

2-29 1984

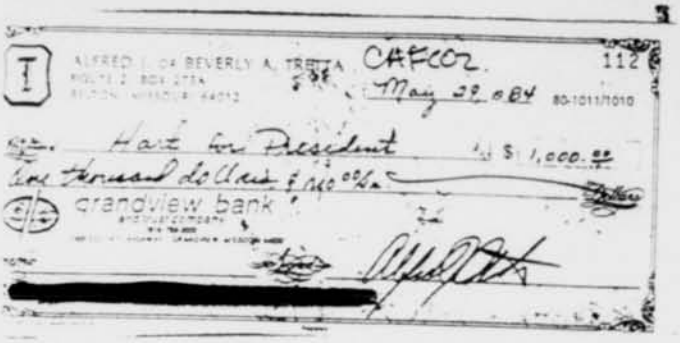
Hart For President $ 1000.00

One Thousand & 00/100 DOLLARS

BANK-HOLDEN

Joan Kelly

[redacted]



ALFRED [redacted] OR BEVERLY A. TRETTA
[redacted]
BELTON, MISSOURI 64012

CAFCOZ 112

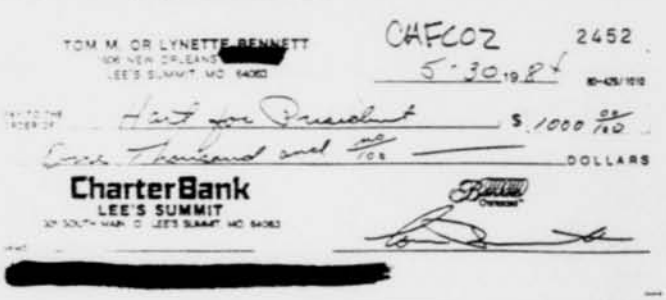
May 29 1984 80-1011/1010

Hart for President $ 1,000.00

One Thousand Dollars & 00/100

grandview bank
AND TRUST COMPANY

[redacted]



TOM M. OR LYNETTE [redacted] BENNETT
[redacted]
LEE'S SUMMIT, MO 64063

CAFCOZ 2452

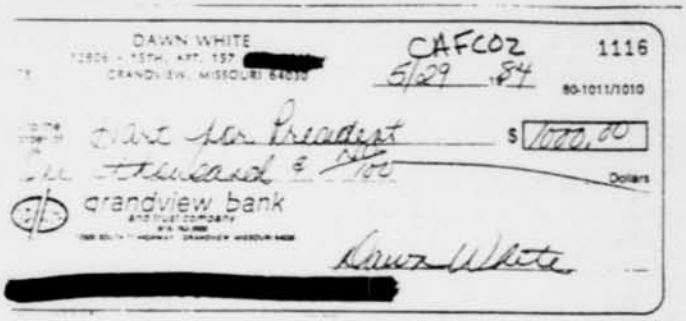
5-30 1984 80-425/1010

Hart for President $ 1000 00/100

One Thousand and no/100 DOLLARS

CharterBank
LEE'S SUMMIT
[redacted] LEE'S SUMMIT MO 64063

[redacted]



DAWN WHITE
12809 - 157TH APT. 157 [redacted]
GRANDVIEW, MISSOURI 64030

CAFCOZ 1116

5/29 1984 80-1011/1010

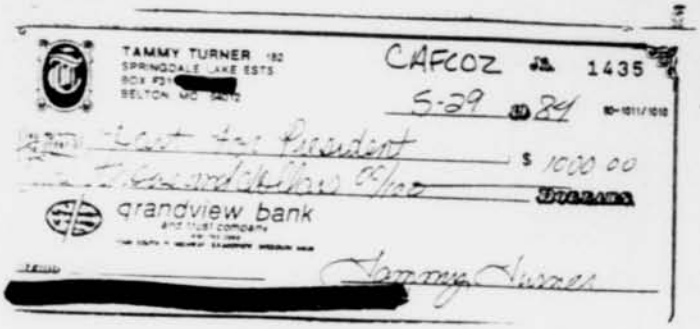
Hart for President $ 1000.00

One thousand & 00/100 Dollars

grandview bank
AND TRUST COMPANY

Dawn White

[redacted]



TAMMY TURNER [redacted]
SPRINGDALE LAKE ESTS
BOX [redacted]
BELTON, MO 64012

CAFCOZ 1435

5-29 1984 80-1011/1010

Hart for President $ 1000 00

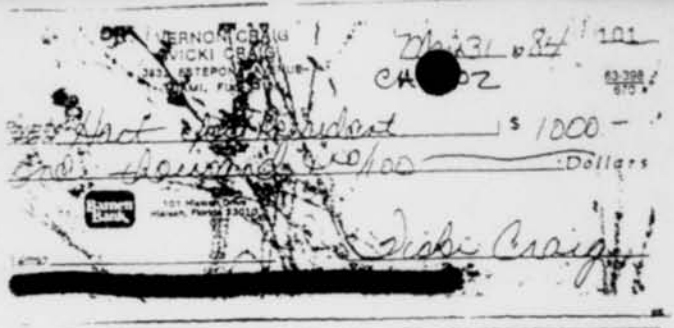
One thousand dollars 00/100 DOLLARS

grandview bank
AND TRUST COMPANY

Tammy Turner

[redacted]

930435532405



VERNON CRAIG
VICKI CRAIG
[redacted]
MIAMI, FL [redacted]

5/31 19 84 101

CAFCO2 63-398/870

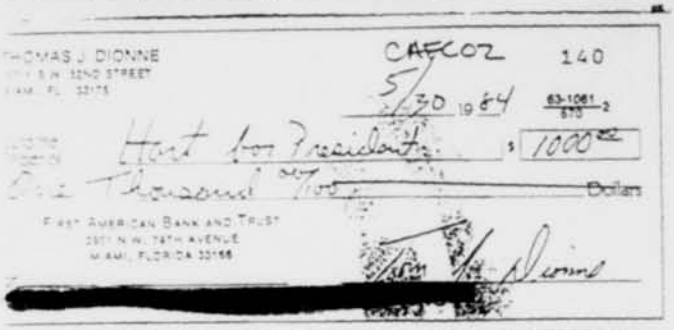
Pay to the order of Hart for President $ 1000 —

One thousand and 00/100 Dollars

101 Hialeah Drive
Hialeah, Florida 33010

Vicki Craig

[redacted]



THOMAS J DIONNE
[redacted] SW 32ND STREET
MIAMI, FL 33175

CAFCO2 140

5/30 19 84 63-1061/670

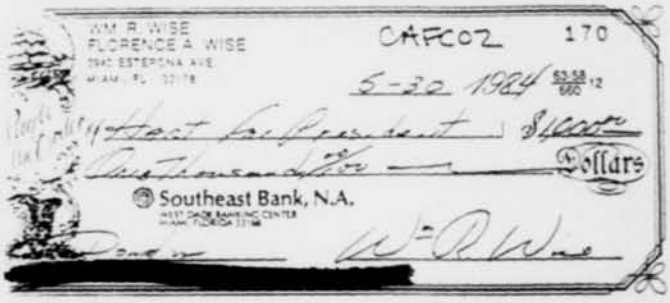
Pay to the order of Hart for President $ 1000 00

One Thousand and 00/100 Dollars

FIRST AMERICAN BANK AND TRUST
2911 N.W. 74TH AVENUE
MIAMI, FLORIDA 33166

[redacted]

Thomas J Dionne



WM R WISE
FLORENCE A WISE
3940 ESTEPONA AVE
MIAMI, FL 33178

CAFCO2 170

5-30 1984 63-58/660

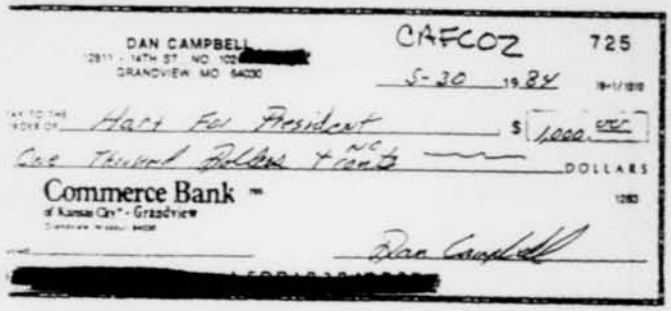
Pay to the order of Hart for President $1000.00

One thousand and 00/100 Dollars

Southeast Bank, N.A.
FIRST UNION BANKING CENTER
MIAMI, FLORIDA 33131

[redacted]

W R Wise



DAN CAMPBELL
12811 - 14TH ST NO 103
GRANDVIEW MO 64030

CAFCO2 725

5-30 1984 19-1/1010

PAY TO THE ORDER OF Hart For President $ 1000.00

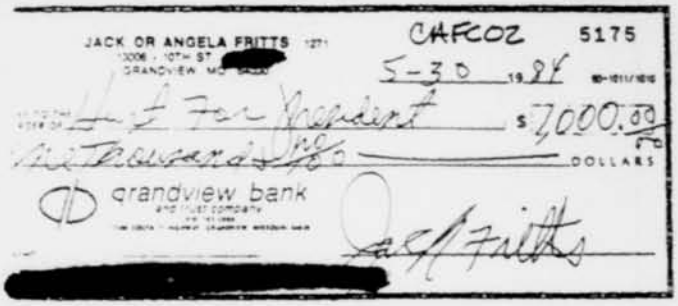
One Thousand Dollars & No Cents DOLLARS

Commerce Bank
of Kansas City - Grandview
GRANDVIEW, MISSOURI 64030

1283

[redacted]

Dan Campbell



JACK OR ANGELA FRITTS
[redacted] - 10TH ST
GRANDVIEW, MO [redacted]

CAFCO2 5175

5-30 1984 80-1011/1010

PAY TO THE ORDER OF Hart For President $ 7,000.00

Seven Thousand and 00/100 DOLLARS

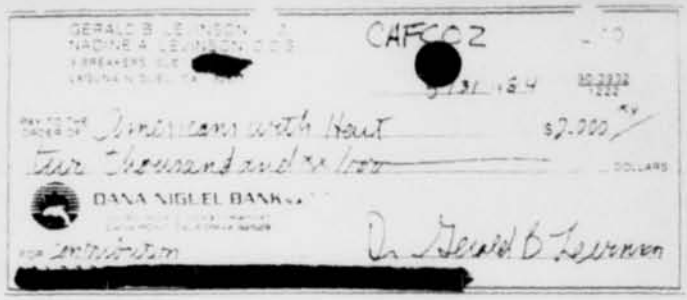
grandview bank
and trust company
GRANDVIEW, MISSOURI

[redacted]

Jack Fritts

930435324006

930435324007



GERALD B. LESSMAN, M.D.
NADINE A. LESSMAN, D.D.S.
[redacted]
LAGUNA NIGUEL, CA [redacted]

CAFCO2 [illegible]

5/31 19 84 [illegible]

PAY TO THE ORDER OF Americans with Heart $2,000 XX

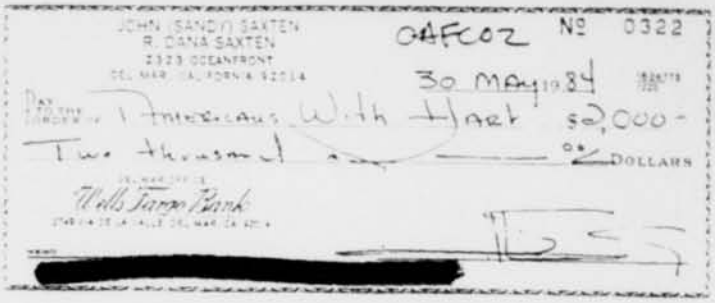
Two Thousand and no/100 DOLLARS

DANA NIGUEL BANK
[illegible]

FOR Donation

[redacted]

Dr. Gerald B. Lessman



JOHN (SANDY) SAXTEN
R. DANA SAXTEN
2323 OCEANFRONT
DEL MAR, CALIFORNIA 92014

CAFCO2 No. 0322

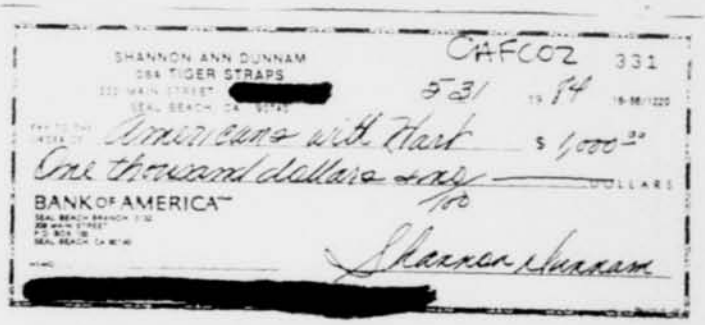
30 MAY 19 84 [illegible]

PAY TO THE ORDER OF Americans With Heart $2,000-

Two thousand and no/100 DOLLARS

DEL MAR OFFICE
Wells Fargo Bank
[illegible]

MEMO [redacted]



SHANNON ANN DUNNAM
264 TIGER STRAPS
[redacted]
SEAL BEACH, CA [illegible]

CAFCO2 331

5/31 19 84 [illegible]

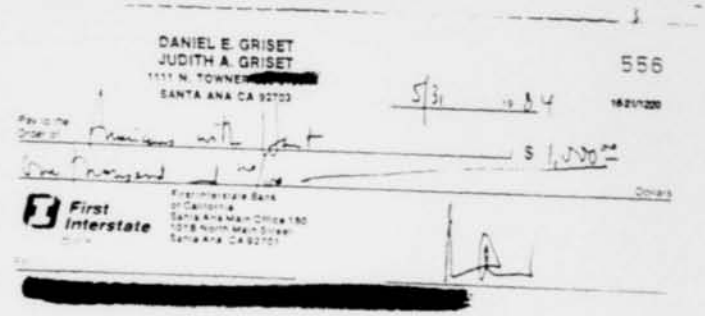
PAY TO THE ORDER OF Americans with Heart $1,000.00

One thousand dollars and no/100 DOLLARS

BANK OF AMERICA
SEAL BEACH BRANCH [illegible]
[illegible]
P.O. BOX [illegible]
SEAL BEACH, CA [illegible]

MEMO [redacted]

Shannon Dunnam



DANIEL E. GRISET
JUDITH A. GRISET
1111 N. TOWNE [redacted]
SANTA ANA CA 92703

556

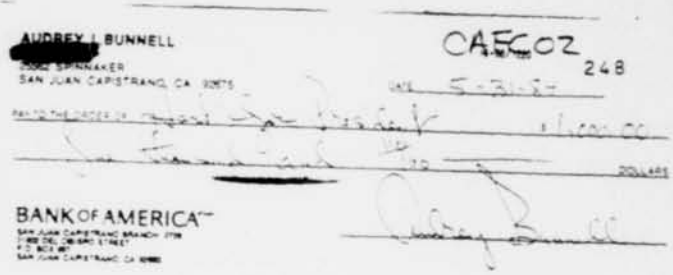
5/31 19 84 [illegible]

PAY TO THE ORDER OF Americans with Heart $ 1,000.00

One Thousand and no/100 Dollars

First Interstate
First Interstate Bank of California
Santa Ana Main Office 180
1018 North Main Street
Santa Ana, CA 92701

[redacted]



AUDREY J. BUNNELL
[redacted]
SAN JUAN CAPISTRANO, CA [illegible]

CAFCO2 248

DATE 5-31-84 [illegible]

PAY TO THE ORDER OF [illegible] $1,000.00

[illegible] DOLLARS

BANK OF AMERICA
SAN JUAN CAPISTRANO BRANCH [illegible]
[illegible]
P.O. BOX [illegible]
SAN JUAN CAPISTRANO, CA [illegible]

9304353524008

MERT WALLEN
[redacted]
BEVERLY HILLS, CA 90212

CAFC02 12 205
May 31 19 84
Pay to the order of American Way for HART $250.00
Two Hundred Fifty & 00/100 Dollars
MITSUI MANUFACTURERS BANK
8484 WILSHIRE BLVD.
BEVERLY HILLS, CALIFORNIA 90211
For [redacted]
Mert Wallen

RICHARD L. PETERSON
WINNIFRED E. PETERSON
[redacted]
LAGUNA NIGUEL, CA 92677

CAFC02 1055
January 1 19 84
Pay to the Order of [redacted] $ [redacted]
Dollars
MONARCH BANK
[redacted]
For [redacted]

COURTLAND P. PAUL
LANDSCAPE ARCHITECT
[redacted]
IRVINE, CA 92714

CAFC02 360
5/30 19 84
Pay to the Order of Americans for Hart $ 100.00
One Hundred & 00/100 Dollars
ORANGE CITY BANK
1535 MACARTHUR BLVD.
NEWPORT BEACH, CALIFORNIA 92660
For [redacted]
Courtland Paul

CAFC02
To the Order of Americans for Hart
One Hundred Dollars
BANK OF AMERICA
[redacted]

MICHAEL D. RAY
2699 WHITE RD., STE. 150
[redacted]
IRVINE, CA 92714

CAFC02 1923
5-31 19 84
Pay to the Order of Americans with Heart $ 7500
Fifteen Hundred & 00/100 Dollars
First Interstate Bank
First Interstate Bank of California
Corona Del Mar Office 185
3141 East Coast Highway
Corona Del Mar, CA 92625
For Contribution from Members
[redacted]

SHIRLEE A. FONDA
SPECIAL ACCOUNT

CAFC02

30 May 84

TO THE ER OF Americans With Hart $ 140.00

Wells Fargo Bank

[redacted] Shirlee A. Fonda

BEVERLY HILLS SAVINGS 14- 872234891 2

[redacted]

DATE MAY30-84

*********400 AND 00/100 DOLLARS

FOUR HUNDRED AND 00/100 DOLLARS

THE ****AMERICANS WITH HART****

RE:DAVID ROBINSON
CAFC-45

[redacted]

MORRIS M. SKENDERIAN & ASSOC., A.I.A.
ARCHITECTURE
[redacted]
LAGUNA BEACH, CA

CAFC02

JUNE 1 19 84

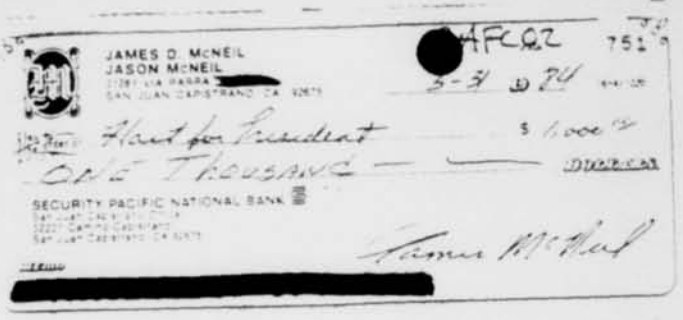
PAY TO THE ORDER OF GARY HART FOR PRES. $ 200.00

TWO Hundred & 00/100 DOLLARS

THE LAGUNA BANK, N.A.

[redacted]

930435324409


JAMES D. McNEIL
JASON McNEIL
[redacted]
SAN JUAN CAPISTRANO, CA 92675

CAFC02 751

5-3 19 84

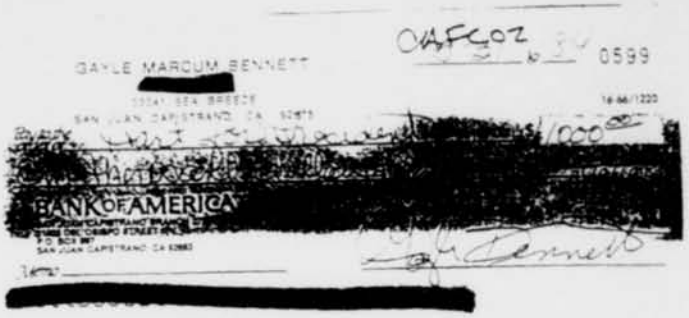
Hart for President $ 1,000 00

One Thousand DOLLARS

SECURITY PACIFIC NATIONAL BANK

James McNeil

[redacted]

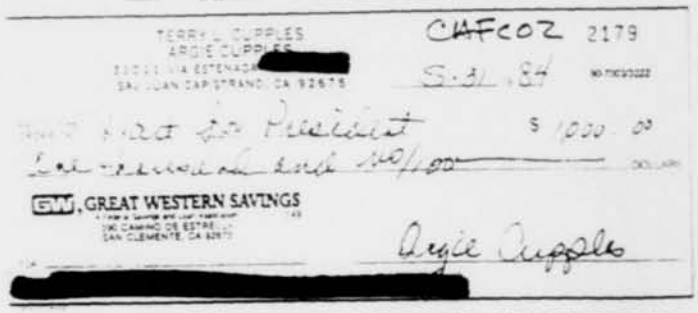

GAYLE MARCUM BENNETT
[redacted]
SAN JUAN CAPISTRANO, CA 92675

CAFC02 0599

Hart for President $1,000

BANK OF AMERICA

[redacted]


TERRY L. CUPPLES
ARDIE CUPPLES
[redacted]
SAN JUAN CAPISTRANO, CA 92675

CAFC02 2179

5-1 19 84

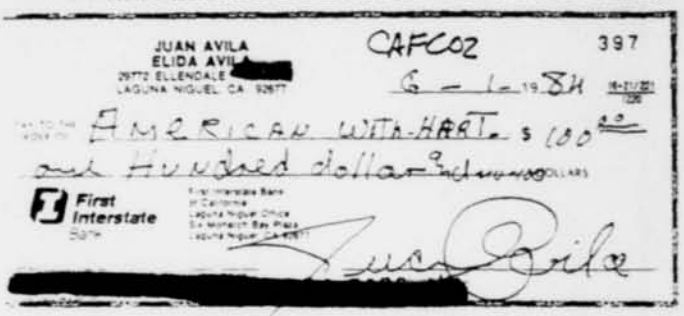
Hart for President $ 1000 00

One thousand and 00/100 DOLLARS

GW GREAT WESTERN SAVINGS

[redacted]

Ardie Cupples


JUAN AVILA
ELIDA AVILA
[redacted]
LAGUNA NIGUEL, CA 92677

CAFC02 397

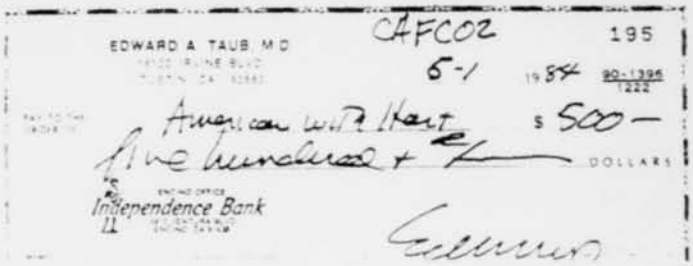
6 - 1 19 84

AMERICAN WITH HART $ 100 00

one Hundred dollar 3rd DOLLARS

First Interstate

[redacted]


EDWARD A. TAUB, M.D.
[redacted]
IRVINE, CA 92660

CAFC02 195

6-1 19 84 80-1396/1222

American with Hart $ 500—

five hundred + — DOLLARS

Independence Bank

[redacted]

93043532410

STEIN BROS. GROUP

May 30, 1984

Mr. Doug Rosen
"Americans With Hart"
507 8th Street., S.E.
Washington, D.C. 20002

Dear Doug:

On behalf of Messrs. David Stein, Bernie Schneider, and Stuart Karl of the Orange County Hart Campaign, enclosed please find checks and photocopies totaling $ 2,350 payable to "Americans With Hart". Copies will also be sent to your Denver office.

We request that the total amount be credited to the National Finance Committee account of David Stein (code #CAFC02).

Again, according to our records the campaign still has not made payment in the amount of $1,693.96 for bus transportation to the Carole King Concert. Please resolve this matter as soon as possible.

If you have any questions, or desire additional information, please feel free to contact me.

Yours truly,

Chris Townsend

Chris Townsend
Director of Public Affairs

CT:pt
Enclosures
cc: John Emerson
Doug Rosen (Denver office)

C20435532411

AMERICANS WITH HART

SCHEDULE OF CONTRIBUTIONS

RAISED IN ORANGE COUNTY

CREDIT TO DAVID STEIN

CODE #CAFC02

Name	Amount
Robert C. Mister	$ 250.00
Mary Ann Smith	100.00
J. Robert Thibaut	2,000.00
TOTAL	$2 350.00

9304353241 2

CAFCO2 1161

J ROBERT THIBAUT
[redacted]
LAHAINA MAUI HAWAII [redacted]

May 21 19 84 50-222/1211

PAY TO THE ORDER OF Americans with Heart $ 2,000.00

Two thousand and 00/100 - - -

May 29, 1984

Mr. Doug Rosen
"Americans With Hart"
507 8th Street, S.E.
Washington, D.C. 20002

Dear Doug:

On behalf of Messrs. David Stein, Bernie Schneider, and Stuart Karl of the Orange County Hart Campaign, enclosed please find checks and photocopies totaling $4,850.00 payable to "Americans With Hart". Copies will also be sent to your Denver office.

We request that the total amount be credited to the National Finance Committee account of David Stein (Code #CAFC02).

Again, according to our records the campaign still has not made payment in the amount of $1,693.96 for bus transportation to the Carole King Concert. Please resolve this matter as soon as possible.

If you have any questions, or desire additonal information, please feel free to contact me.

Yours truly,

Chris Townsend
Director of Public Affairs

CT:pt
Enclosures
cc: John Emerson

29982 Ivy Glenn, Laguna Niguel, CA 92677 • (714) 859-6095

AMERICANS WITH HART
SCHEDULE OF CONTRIBUTIONS
RAISED IN ORANGE COUNTY
CREDIT TO DAVID STEIN
CODE #CAFC02

Name		Amount
Raymond & Joanne Peloso		$ 500.00
Howard Englander		250.00
Dianne & Andrew Xitco		1,000.00
Wilson & Susan Hart		1,000.00
Cary Munson Garland		500.00
Edward Lohrbach		500.00
Julie Sandler		500.00
Jane Fonda		600.00
	TOTAL	$4,850.00

9304353241 5

93043532416

CA-FC-A

DIANNE XITCO
ANDREW XITCO
12971 GLENDA ST [redacted]
CERRITOS, CA [redacted]

780

5-25- 19 84

PAY TO THE ORDER OF Americans for Hart $ 100 00

One thousand and 00/100 DOLLARS

CROCKER NATIONAL BANK
LONG BEACH MAIN OFFICE
301 E. OCEAN BLVD., LONG BEACH, CALIFORNIA 90802

Dianne K. Xitco

MEMO [redacted]

WILSON B. HART
SUSAN B. HART
[redacted]
SANTA ANA, CA 92701

CAFC02

2895

19 May 19 84

16-24/602
1220(7)

PAY TO THE ORDER OF Gary Hart for President $ 1,000. 00

One thousand & 00/100 DOLLARS

SANTA ANA OFFICE
WELLS FARGO BANK
1222 NORTH BROADWAY, SANTA ANA, CA 92706

Wilson B. Hart

[redacted]

CARY MUNSON GARLAND
41 MONTPELIER
NEWPORT BEACH, CA [redacted]

CAFC02

8930

May 22 19 83

10-40/1222

PAY TO THE ORDER OF "AMERICANS FOR HART" $ 500.00

Five hundred dollars & 00/100 DOLLARS

CALIFORNIA FIRST BANK
HARBOR VIEW OFFICE
1444 San Miguel Drive
Newport Beach, California

Cary Munson Garland

MEMO [redacted]

EDWARD D. LOHRBACH
31866 CAMINO CAPISTRANO
SAN JUAN CAPISTRANO, CA 92675

CAFC02

1203

May 23 19 84

PAY TO THE ORDER OF Committee to Elect Hart $ 500 00

Five Hundred and 00/100

First Interstate Bank
First Interstate Bank of California
Orange County Airport Office
4667 MacArthur Boulevard
Newport Beach, CA 92660

Edward D. Lohrbach

[redacted]

WILSHIRE BLVD. SUITE 2110
[redacted]

90-3070/1222
THE BANK OF CALIFORNIA
BEVERLY HILLS OFFICE
9401 WILSHIRE BLVD.
BEVERLY HILLS, CA. 90212

SIX HUNDRED DOLLARS EXACTLY

$****600.00

AMERICANS WITH HART
C/O DAVID STEIN
29882 IVY GLEN
LAGUNA NIGEL, CA. 29677
ATTENTION: CHRIS TOWNSEND

:122230703 075-405015

[redacted]

MONARCH BANK
[redacted] CENTER DRIVE
[redacted] CALIFORNIA 92677

CAFCOZ 29840

MAY 23, 1984

.....AMERICANS WITH HART..... $600.00

CASHIER'S CHECK

Sandra Thurman

"029840" :122237968: 0199921647 19

RAYMOND S. YUSI
JOANNE PELOSO
[redacted] VIA RANCHO
SAN CLEMENTE, CA 92672

CAFCOZ 2038

5/24 1984 80-2738 1220

THE ORDER OF AMERICANS WITH HART $ 500.00

FIVE HUNDRED DOLLARS

MONARCH BANK
[redacted] Town Center Drive
Irvine, California 92677

Charter Account

[redacted]

HOWARD ENGLANDER CO.
[redacted]
LAGUNA BEACH, CA 92651

CAFCOZ 2003

5-25 1984 18-68 1220

Americans with Hart $ 250.00

Two hundred fifty + 00/100

BANK OF AMERICA

DOLLARS

[redacted]

930435324117

May 29, 1984

Mr. Rick Reiter
"Americans With Hart"
7265 Franklin Avenue
Los Angeles, CA 90046

Dear Rick:

On behalf of Mr. David Stein, enclosed please find a schedule of contributions and checks totalling $347.00 payable to "Americans With Hart".

These funds were raised in Orange County specifically to help cover the costs for the following national staff members currently stationed in Orange County:

Sims Hinds
Mark Blumenthal
Steve Pigeon
O.J. King
Elizabeth Braden

We hope these individuals can receive the benefits of these contributions.

Please feel free to contact me if you have any questions.

Yours truly,

Chris Townsend

Chris Townsend
Director of Public Affairs

CT:pt
Enclosures
cc: Doug Rosen
John Emerson

30982 Ivy Glenn, Laguna Niguel, CA 92677 • (714) 859-6905

AMERICANS WITH HART
SCHEDULE OF CONTRIBUTIONS
RAISED IN ORANGE COUNTY
CREDIT TO DAVID STEIN
CODE #CAFC02

Name		Amount
Alan & Darcy Kremen	$	20.00
R.F. & Sally Kreile		20.00
Thelma Bradshaw		20.00
John & Judy Pohold		20.00
Robert Scheldrup		10.00
Harris & Eilene Kremen		20.00
Eva Johnson		10.00
Sheryl Steindler		10.00
Jean Hofve		5.50
Tania Treeland		20.00
Simon Leopold		10.00
Albert Solot		10.00
Myron & Marina Hankins		50.00
Clyde & Ruth Baker		25.00
B.R. Horvath		10.00
Dana Ruth Sanger		5.00
Dorothy B. Callison		11.00
Michael J. Dotterer		11.00
Darryl & Shari Lieberman		16.50
Susan E. Nawa		11.00
Robert K. Stiens		11.00
Chris Norby		5.50
Michael J. Dotterer		5.50
Robert A. Hiatt		10.00
TOTAL	$	347.00

9304353241 9

9304353224220

ROBERT A. STIENS
[redacted]
CAFCO2 1529
5/4 19 84
16-21/1220
Pay to the order of [illegible] $ 11.00
Dollars
First Interstate
The Official Bank of The 1984 Olympics
[redacted]

CHRIS NORBY
[redacted]
FULLERTON, CA 92631
CAFCO2 1430
May 20 19 84 16-4/1220
Hurricane w/ Hart
Five & 50/100 $ 5 50
DOLLARS
SECURITY PACIFIC NATIONAL BANK
Fullerton Office
[redacted]
Chris Norby
[redacted]

MICHAEL J. DOTTERER
[redacted]
SANTA ANA, CA 92701
CAFCO2 252
5/13 19 84
Hurricane with Hart $ 5.50
Five dollars and 50/100 cents DOLLARS
BANK OF AMERICA
Michael Dotterer
[redacted]

ALAN KREMEN
DARCY P. KREMEN
[redacted]
IRVINE, CA 92680
CAFCO2 1371
9/14 19 84
Americano with Hart $ 20.00
Twenty and 00/100 DOLLARS
BANK OF AMERICA
[redacted]

R. F. KREILE
SALLY D. KREILE
1042 DORSETSHIRE LANE
[redacted]
SANTA ANA, CA 92705
CAFCO2 1679
4/23 1984 164-1220
Americano with Hart $ 20.00
Dollars
Telephone Employees Credit Union
[redacted]
Thanks for the [illegible]

ROBERT A HIATT, PHARM D
DAVIS PHARMACY
4450 CALIFORNIA PL. 423-5481
LONG BEACH, CA 90807
CAFCO2 4990
90-2760/1222
5-14 19 84
PAY TO THE ORDER OF Americano w/ Hart $ 10 00
TEN & NO/100 DOLLARS

9304355324211

1481 CAFCO2

Travelers Express Money Order 18 4151 360

TRAVELERS EXPRESS COMPANY INC
P.O. BOX 878 MINNEAPOLIS, MN 55480

DATE April 16, 1984

PAY TO THE ORDER OF Americans with Heart

ONE HUNDRED AND THREE HUNDRED U.S. DOLLARS

DOLLARS

SIGNATURE [signature] ADDRESS 201 JUNIPER SANTA ANA, CA.

92707

Simon A. Leopold 10-83
1812a W. 5th Street
Santa Ana, Ca. 92703

CAFCO2 3158

4-16 19 84

PAY TO THE ORDER OF Americans with Heart $ 10 XX

ten Dollars & no cents XXX DOLLARS

WORLD SAVINGS

Campaign Dorm. Simon A. Leopold

[redacted]

CAFCO2 80

DATE 4/16/84

PAY TO THE ORDER OF AMERICANS WITH HART $ 10.00

ten and 00/100 DOLLARS

NK OF AMERICA

Albert Solot

[redacted]

TON C. HANKINS
GINA O. HANKINS

[redacted] CATALPA #314
ORNA, CA 92801

PAY TO THE ORDER OF Citizens for Hart for President $ 50.00

fifty and NO/100 DOLLARS

NK OF AMERICA
ANAHEIM BRANCH 3673
CRESCENT AVENUE
SCN 4130
ANA, CA 92802

Myron D. Hankins

[redacted]

1644/1220 CAFCO2 2042

5-20 19 84

9304353224222

THELMA A. BRADSHAW
[redacted]
LAGUNA BEACH, CA 92651

CAFCO2 3484
April 19 84
PAY TO THE ORDER OF Five w/ Hart Eagle Game $ 20.00
Twenty NO/100 DOLLARS
Southwest Bank 800 Glenneyre
Thelma A. Bradshaw
[redacted]

JOHN W. POHLOD II
JUDY F. POHLOD
[redacted] BALBOA
[redacted] CA 92660

CAFCO2 1781
April 25, 84 16-58/1220
PAY TO THE ORDER OF Americans With Hart $ 20.00
Twenty and 00/100 DOLLARS
BANK OF AMERICA
[redacted] EAST HARBOR BLVD
[redacted] ANA, CA 92705
2T set 5 Judy F Pohlod
[redacted]

OBERT S. SCHELDRUP
[redacted]
72 S. PINE
RANGE, CA 92666

CAFCO2 477
April 16 19 84 16-58/1220
PAY TO THE ORDER OF Americans with Hearts $ 10.00
Ten and no/100 DOLLARS
BANK OF AMERICA
[redacted] Robert S. Scheldrup
[redacted]

HARRIS M. OR EILEEN KREMEN
3701 DOMINGO RD
FULLERTON, CA 92635

CAFCO2 5737
4/16 19 84 16-58/1220
PAY TO THE ORDER OF Americans With Hearts $ 20.00
[redacted] DOLLARS
BANK OF AMERICA
[redacted] Janice M Kremen
[redacted]

EVA V. JOHNSON
5922 SAWYER ST
[redacted]
LOS ANGELES, CA 90038

April 11 19 84 0725
CAFCO2 16-46/1220
Pay to the order of Americans with Hart $ 10.00
Ten Dollars 00 Dollars
BANK OF AMERICA
[redacted]
For Political Contrib. Eva V. Johnson
[redacted]

SANTA ANA OFFICE
2101 N. BROADWAY, SANTA ANA, CA 92706

Pay to the order of Americans with Hart 10.00
Ten dollars and 00/100
CHERYL STEINDLER
38 BEAR PARK, 67-D
IRVINE, CA 92714

Americans with Hart 10.00
Five and 50/100
First Interstate Bank of California
[redacted]
Newport Beach, CA 92660
For [redacted]

May 4, 1984

Mr. Doug Rosen
"Americans With Hart"
507 8th Street, S.E.
Washington, D.C. 20002

Dear Doug:

On behalf of Messrs. David Stein, Bernie Schneider and Stuart Karl of the Orange County Hart Campaign, enclosed please find a contribution schedule and photocopies of six checks totalling $1,276.00 payable to "Americans With Hart". The checks were sent directly to your Denver office.

We request that the total amount be credited to the National Finance Committee account of Bernie Schneider (code #CAFC43).

If you have any questions, or desire additional information, please feel free to contact me.

Yours truly,

Chris Townsend

Chris Townsend
Executive Assistant

CT:pt
Enclosures
cc: Pudge Henkel
John Emerson

29982 Ivy Glenn, Laguna Niguel, CA 92677 • (714) 859-6995

AMERICANS WITH HART
SCHEDULE OF CONTRIBUTIONS
RAISED IN ORANGE COUNTY
CREDITED TO BERNIE SCHNEIDER
CODE #CAFC43

Name		Amount
Jay Horton		$ 1,000.00
John Lehr		200.00
Tom Daly		50.00
Carolyn Pegg		20.00
Jeanne Mozingo		5.00
Lois Smith		1.00
	TOTAL	$ 1,276.00

93043532424

HORTON, BARBARO & REILLY 1-84
LAWYERS
517 N. MAIN ST., 2ND FL. [redacted]
SANTA ANA, CA 92701

CAFC43 Bernie 12882 Schneider

March 23 1984

90-2800/1222

PAY TO THE ORDER OF Americans with Hart $1,000.00

One Thousand and 00/100---------- DOLLARS

Sunwest Bank
Santa Ana Branch
Civic Center Plaza
600 Santa Ana Blvd.
Santa Ana, California 92701

[redacted]

930435325425

JOHN F. LEHR, JR.
[redacted]
17992 COWAN ST.
IRVINE, CA 92714

CAFC43 Bernie 569 Schneider

April 19 84

90-7003/3222

Pay to the Order of Americans with Hart $200 00

Two Hundred Dollars

GW, GREAT WESTERN SAVINGS
3200 PARK CENTER DRIVE 129
COSTA MESA, CA 92626

For [redacted]

John F. Lehr, Jr

RICHARD G. SMITH
LOIS E. SMITH
1716 PRELUDE DR [redacted]
ANAHEIM, CA 92807

CAFC43

May 2 1984 4840

16-66/1220

Pay to the order of American with Hart $ 1.00

One 00/100 Dollars

BANK OF AMERICA
YORBA LINDA BRANCH 0405
4802 SOUTH MAIN STREET
P.O. BOX 488
YORBA LINDA, CA 92686

Memo [redacted]

Lois E. Smith

[redacted] 1463

J. DAVID MOZINGO, D.D.S.
JEANNE MOZINGO
211 MONARCH BAY [redacted]
SOUTH LAGUNA, CA 92677

4-26 19 84 16-4/1220

PAY TO THE ORDER OF Americans With Hart $

Four and 00/100 DOLLARS

SECURITY PACIFIC NATIONAL BANK
Laguna Niguel Office #0274
30202 Crown Valley Pkwy
Laguna Niguel, CA 92677

MEMO [redacted]

Jean C Mozingo

[redacted]

CAFC43 154

Carolyn Pegg
709 Arcado Ave [redacted]
Corona Del Mar, Ca 92625

April 13 1984 16-4/1220

PAY TO THE ORDER OF Americans with Hart $ 20.00

Twenty and no/100 DOLLARS

SECURITY PACIFIC NATIONAL BANK
Newport Center Office #0169
550 Newport Center Drive
Newport Beach, CA 92660

MEMO political contribution Carolyn Pegg

[redacted]

930435324266

THOMAS F. DALY
425 N WEST ST. [redacted]
ANAHEIM, CA 92801

CAFC43 140

May 1 1984 16-4/1220

PAY TO THE ORDER OF Americans w/ Hart $ 50.00

Fifty DOLLARS

TO ORANGE COUNTY EMPLOYEES CREDIT UNION
808 North Rose St. • Santa Ana, CA 92701

FOR [redacted]

Thomas F Daly

April 17, 1984

Mr. Doug Rosen
"Americans With Hart"
507 8th Street, S.E.
Washington, D.C. 20002

Dear Doug:

On behalf of Messrs. David Stein, Bernie Schneider and Stuart Karl of the Orange County Hart Campaign, enclosed please find a contribution schedule and photocopies of checks and in-kind contributions totalling $1,240.00 payable to "Americans With Hart". The checks were sent directly to your Denver office.

We request that the total amount be credited to the National Finance Committee account of Bernie Schneider (code #CAFC43).

Also enclosed is a bill from Lounge Car Tours totalling $1,693.96 for the buses used to transport 200 Orange County Hart supporters to the Carole King concert at the Dorothy Chandler Pavilion on March 24, 1984. Per our previous discussions, the prompt payment of this bill by the campaign directly to Lounge Car Tours would be greatly appreciated.

If you have any questions, or desire additional information, please feel free to contact me.

Yours truly,

Chris Townsend

Chris Townsend
Executive Assistant

Enclosures

cc: Pudge Henkel
John Emerson

CT: [illegible]

AMERICANS WITH HART
SCHEDULE OF CONTRIBUTIONS
RAISED IN ORANGE COUNTY
CREDITED TO BERNIE SCHNEIDER
CODE #CAFC43

Direct Contributions:

John Black		$ 1,000.00
Al Levin		50.00
Randall Brown		50.00
Rose Carter		25.00
Dave Musgrove		15.00
	Subtotal:	$ 1,140.00

In-Kind Contributions:

Dennis McDonnel		100.00
	Subtotal:	$ 100.00
	GRAND TOTAL	$ 1,240.00

930435324288

DAVE MUSGROVE
600 LANGSDORF DR. NO D23[redacted]
FULLERTON, CA 92631

CAFC43 137

April 11 19 84 16-4/1220

PAY TO THE ORDER OF Americans With Hart $ 15.00

Fifteen and no/100 DOLLARS

SECURITY PACIFIC NATIONAL BANK
East Fullerton Office #0176
2518 E. Chapman Ave.
[redacted] 92631
[redacted]

Dave Musgrove

ROSE E. CARTER
685-C VIA ALHAMBRA [redacted]
LAGUNA HILLS, CA 92653

CAFC43 Bernie Schneider 2329

4-11 19 84 164/1220

Pay to the Order of Americans for Hart $ 25.00

Twenty five and no/100 Dollars

SECURITY PACIFIC NATIONAL BANK
Laguna Hills Office #0275
24211 Paseo de Valencia, Laguna Hills, CA 92653

Memo Elect Hart Brings Hope [redacted]

Rose E. Carter

930453532429

CAFC43 2974

JOHN W. BLACK
ATTORNEY AT LAW
1646 IRVINE AVENUE
NEWPORT BEACH, CA 92660

April 5 19 84 90-49/1222

PAY TO THE ORDER OF Americans With Hart $ 1000.00

One Thousand and no/100 DOLLARS

CALIFORNIA WESTCLIFF OFFICE
1501 Westcliff Drive
Newport Beach, California 92660

FIRST BANK

John W. Black

[redacted]

CAFC43 0505

RANDALL S. BROWN
2760 ASSOCIATED RD. APT. 17
FULLERTON, CA 92635

4-3 19 84 16-4/1220

Pay to the Order of Americans With Hart $ 50.00

Fifty & 00/100 Dollars

Hughes Aircraft Employees "The Paymaster"
Federal Credit Union
1440 Rosecrans Avenue, Manhattan Beach, CA 90266
PAYABLE THROUGH SECURITY PACIFIC NATIONAL BANK
HEADQUARTERS OFFICE C.B.S. 3-65, LOS ANGELES, CA 90071

Memo

Randall Brown

[redacted]

9304532435

ALVIN LEVIN
DOROTHY LEVIN [redacted]
9134 NO. MARINA PACIFICA DR.
LONG BEACH, CA 90803

April 3 19 84 7943

CAFC43

Pay to the order of AMERICANS WITH HART $ 50.00

*******FIFTY******************00/00 Dollars

First Interstate Bank
First Interstate Bank
of California
The Market Place Office
6439 Pacific Coast Hwy.
Long Beach, CA 90803

Memo

Alvin Levin

[redacted]

EXHIBIT 9-1

AMERICANS WITH HART
IN-KIND CONTRIBUTION RECORD

CONTRIBUTOR:

Name [illegible] R [illegible]
Address 16350 [illegible] # 1810
City [illegible] State CA Zip
OPTIONAL: Phone (Business) 456 5140 (Home) 832 3180
Occupation MANAGER
Employer/Business:
Name WARM ACCEPTANCE CORP
Address 1021 N. EUCLID
City ANAHEIM State CA Zip 92801
Contribution amount $ 100.00 Date of contribution 4-2-84

DESCRIPTION (Attach documentation where available):

POSTAGE STAMPS - ONE HUNDRED DOLLAR ROLL OF .20¢ STAMPS

VALUE:

Amount: $ 100.00 Basis for assigning value:
EXACT AMOUNT OF STAMPS - 100.00 ROLL

ACCOUNTING:

Income account __-____ Description
Expense account __-____ Description
Source code CA-EC-43 Description Bernie Schneider

2/82

9304353243 31

INVOICE NO: 21355

L O U N G E C A R T O U R S

CHARTER DIVISION
8512 NATIONAL BLVD.
CULVER CITY, CA 90230
(213) 558-4477

DATE: 03/31/84

BILL TO:

AMER7 AMERICANS WITH HART/D. ROSEN
[illegible] 8TH STREET S.E.
WASHINGTON, D.C. 20002

GROUP:

NAME: [illegible]
ORDERED BY: [illegible]TOWNSEND
CHARTER #: [illegible]166

SERVICE DATE	P/U TIME	DROP TIME	ELAPSED TIME	------CHARGES------ QTY @ RATE		EXT. $
03/24/84	1800	0115	7:15	HOURS	5 248.50	248.50
				HOURS	2 48.50	97.00
NEWPORT/MUSIC CENTER, L.A./NEWPORT						
21 PAX LOUNGECRUISER/BUS 1						
					TOTAL TRIP	345.50
03/24/84	1800	0100	7: 0	HOURS	5 248.50	248.50
				HOURS	2 48.50	97.00
SAME/21 PAX LOUNGECRUISER/BUS 2						
					TOTAL TRIP	345.50
03/24/84	1800	0100	7: 0	HOURS	5 248.50	248.50
				HOURS	2 48.50	97.00
SAME/53 PAX TOWNCRUISER/BUS 3						
					TOTAL TRIP	345.50
03/24/84	1800	0100	7: 0	HOURS	5 248.50	248.50
				HOURS	2 48.50	97.00
SAME/53 PAX TOWNCRUISER/BUS 4						
					TOTAL TRIP	345.50
03/24/84	1800					
SAME/46 PAX [illegible]XCRUISER/BUS 5/DROP 25:00						
MISCELLANEOUS CHARGE						
					TOTAL TRIP	0.00

MISC: [illegible] 21.00
[illegible] .00

April 2, 1984

Mr. Doug Rosen
"Americans With Hart"
507 8th Street, S.E.
Washington, D.C. 20002

Dear Doug:

On behalf of Messrs. David Stein, Bernie Schneider, and Stuart Karl of the Orange County Hart Campaign, enclosed please find a contribution schedule and photocopies of checks totalling $1,000.00 payable to "Americans With Hart". The checks were sent directly to your Denver office.

Also enclosed are copies of in-kind contributions totalling $1,115.72 collected by Mr. Stein to pay for the catering of the reception he held for Senator Hart at the Pacific Club in Newport Beach on February 12, 1984. This information has also been sent directly to your Denver office.

We request that the enclosed amount of direct and in-kind contributions (totalling $2,115.72) be credited to the National Finance Committee account of Bernie Schneider (code #CAFC43).

If you have any questions, or desire additional information, please feel free to contact me.

Yours truly,

Chris Townsend
Executive Assistant

CT:pt
Enclosures
cc: Pudge Henkel
John Emerson

29982 Ivy Glenn, Laguna Niguel, CA 92677 • (714) 859-0005

AMERICANS WITH HART

SCHEDULE OF CONTRIBUTIONS

RAISED IN ORANGE COUNTY

CREDITED TO BERNIE SCHNEIDER

CODE #CAFC43

Direct Contributions:

Frank Rossi		$ 400.00
Jerry Patterson		100.00
Theodore Caldwell		500.00
	Sub-total	$ 1,000.00

In-kind Contributions:

Ted Townsend		$ 1,000.00
Camilla Kocol		115.72
	Sub-total	$ 1,115.72
	GRAND TOTAL	$ 2,115.72

9304353243 4

CASHIER'S CHECK CAFC43 490990

PURCHASER FRANK ROSSI

MAR 28 1984

PAY TO THE ORDER OF AMERICANS FOR GARY HART

$400.00

EXCHANGE NAT'L BANK OF CHICAGO 400dol's00cts

THE EXCHANGE
National Bank of Chicago
Chicago, Illinois 60603

AUTHORIZED SIGNATURE

CASHIER

"0490990" 1:07100057" 6"020003"

HON. JERRY M. PATTERSON, M. C.

CAFC43 No C

2238 HOUSE OFFICE BUILDING
WASHINGTON, D.C. 20515

15-121
540

Washington D.C. March 24 1984

Pay to the order of Americans with Hart $100 00/100

One hundred and Zero Dollars

The Sergeant at Arms
House of Representatives, U.S.

Jerry M Patterson

THEODORE W. CALDWELL

239 SAN JOAQUIN
LAGUNA BEACH, CA 92651

CAFC43 1334

1 April 19 84

16-66/1220

PAY TO THE ORDER OF Americans with Hart $ 500

Five Hundred Dollars

DOLLARS

BANK OF AMERICA

LAGUNA BEACH BRANCH 0097
299 OCEAN AVENUE
P.O. BOX 957
LAGUNA BEACH, CA 92652

MEMO

Theodore W. Caldwell

EXHIBIT 9-1

AMERICANS WITH HART
IN-KIND CONTRIBUTION RECORD

CONTRIBUTOR:

Name Mr. Ted Townsend
Address 275 Clipper Way
City Seal Beach State CA Zip 90740
OPTIONAL: Phone (Business) (213)598-4431 (Home) (213)431-6158
Occupation Marriage, Family & Child Counselor
Employer/Business:
Name self-employed
Address 10861 Cherry St.
City Los Alamitos State CA Zip 90720
Contribution amount $1,000.00 Date of contribution 4/1/84

DESCRIPTION (Attach documentation where available):

Paid for portion of catering bill for reception held at The Pacific Club in Newport Beach, CA on February 12, 1984 on behalf of Gary Hart.

VALUE:

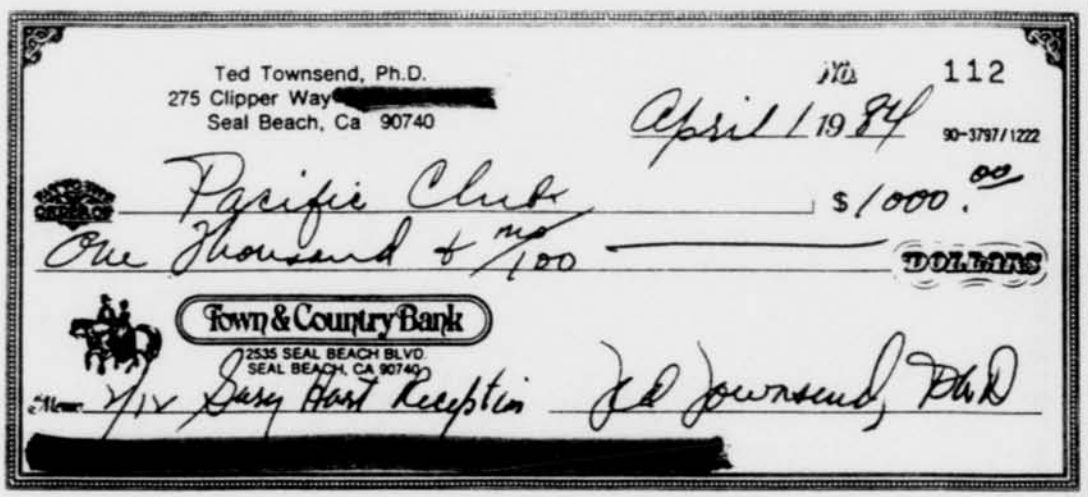
Amount: $1,000.00 Basis for assigning value:
Mr. Ted Townsend paid $1,000.00 towards bill
Ms. Camilla Kocol paid the remainder

ACCOUNTING:

Income account __ - ____ Description
Expense account __ - ____ Description
Source code CA - FC - 43 Description Bernie Schneider

2/83

93043532436



Ted Townsend, Ph.D.
275 Clipper Way [redacted]
Seal Beach, Ca 90740

No. 112

April 1 19 84

90-3797/1222

Pay to the order of Pacific Club $ 1000.00

One Thousand + no/100 DOLLARS

Town & Country Bank
2535 SEAL BEACH BLVD.
SEAL BEACH, CA 90740

For 7/1x Gary Hart Reception J.D. Townsend, Ph.D.

[redacted]

930495324337

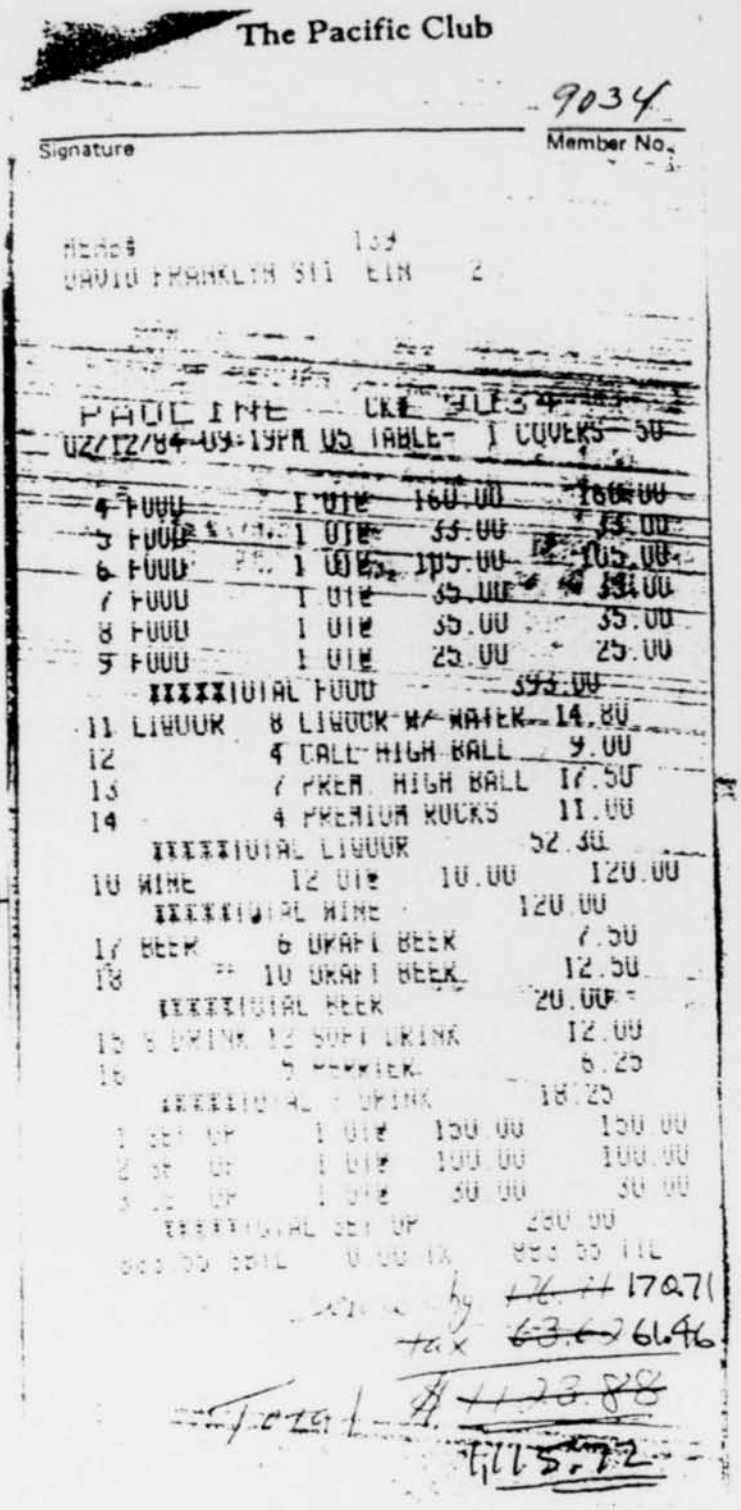
Mr. Townsend,

Enclose is a copy of your bill for Feb. 12, 1984 banquet, as you have requested.

Sincerely,

Jon Shaffer
Administrative Assistant

The Pacific Club


The Pacific Club

9034
Member No.
Signature

HEAD# 139
DAVID FRANKLIN SIT EIN 2

PAID IN FULL
02/12/84 09:19PM 05 TABLE 1 COVERS 50

4 FOOD	1 DIE	160.00		160.00
5 FOOD	1 DIE	55.00		55.00
6 FOOD	1 DIE	105.00		105.00
7 FOOD	1 DIE	55.00		55.00
8 FOOD	1 DIE	55.00		55.00
9 FOOD	1 DIE	25.00		25.00
TOTAL FOOD				505.00
11 LIQUOR	8 LIQUOR W/ WATER			14.80
12	4 CALL HIGH BALL			9.00
13	7 PREM. HIGH BALL			17.50
14	4 PREMIUM ROCKS			11.00
TOTAL LIQUOR				52.30
16 WINE	12 DIE	10.00		120.00
TOTAL WINE				120.00
17 BEER	6 DRAFT BEER			7.50
18	10 DRAFT BEER			12.50
TOTAL BEER				20.00
19 SOFT DRINK	12 SOFT DRINK			12.00
20	5 PERRIER			6.25
TOTAL SOFT DRINK				18.25
1 SPECIAL	1 DIE	150.00		150.00
2 SPECIAL	1 DIE	100.00		100.00
3 SPECIAL	1 DIE	50.00		50.00
TOTAL SPECIAL				230.00
SUB TOTAL	0.00 TAX			955.55 TTL

by ~~17.71~~ 17.71
tax ~~63.67~~ 61.46
Total ~~1123.88~~
1115.72

9304 3532 4838

STEIN BRIEF GROUP

February 24, 1984

Mr. John Emerson
Manatt, Phelps, Rothenberg & Tunney
11355 West Olympic Boulevard
Los Angeles, California 90064

Dear John:

Enclosed please find the following documents relevant to the fundraiser hosted by David Stein on behalf of Senator Gary Hart on Sunday, February 12, at the Pacific Club in Newport Beach:

-- Late check for $250 from Bernie Schneider

-- Contribution list and photocopies of the checks received at the reception. (Doug Rosen took the checks that evening)

-- Attendance register

-- Photocopy of news article in The Register about the reception.

We have also secured individual sponsors to pay for the costs of the reception (approximately $750), documentation of which I will forward to you shortly. At that time, I will also send you copies of thank you letters from David that are being sent to the contributors.

In the meantime, we are putting together a slate of Convention delegates from the five congressional districts in Orange County and will forward the completed forms to you as soon as possible.

Looking forward to victory in New Hampshire!

Yours truly,

Chris

Chris Townsend

CT/gs

enclosures

EXHIBIT 9-1

AMERICANS WITH HART

IN-KIND CONTRIBUTION RECORD

CONTRIBUTOR:

Name Camilla Kocol

Address 2019 W. 35th St.

City San Pedro State CA Zip 90732

OPTIONAL: Phone (Business) (213)625-6653 (Home) (213)519-7011

Occupation Academic Supervisor, Adult Education

Employer/Business:

Name Los Angeles Unified School District

Address Adult Education
1320 W. 3rd St.

City Los Angeles State CA Zip 90017

Contribution amount $ 115.72 Date of contribution 4/1/84

DESCRIPTION (Attach documentation where available):

Paid for portion of catering bill for reception held at The Pacific Club in Newport Beach, CA on Feburary 12, 1984 on behalf of Gary Hart.

VALUE:

Amount: $ 115.72 Basis for assigning value:

Total bill was $1,115.72

Mr. Ted Townsend paid $1,000.00 towards bill
Ms. Camilla Kocol paid the remainder

ACCOUNTING:

Income account __ - ____ Description

Expense account __ - ____ Description

Source code CA - FC - 43 Description Bernie Schneider

2/83

93043532440

Mr. Townsend,

Enclose is a copy of your bill for Feb. 12, 1984 banquet, as you have requested.

Sincerely,

Jon Shaffer
Administrative Assistant

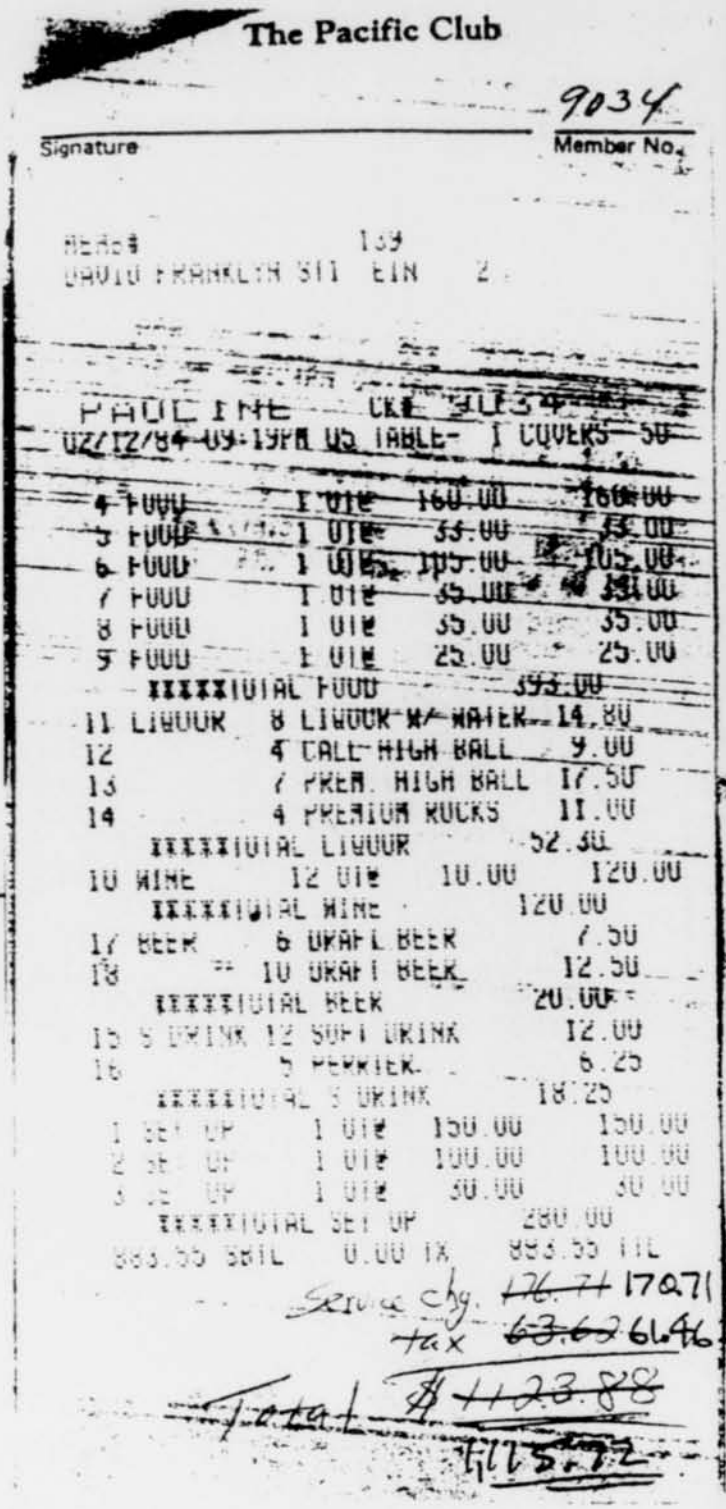
The Pacific Club

9304 5324 4-1

The Pacific Club

9034

Signature _____ Member No.



STEIN BRUCE GROUP

February 24, 1984

Mr. John Emerson
Manatt, Phelps, Rothenberg & Tunney
11355 West Olympic Boulevard
Los Angeles, California 90064

Dear John:

Enclosed please find the following documents relevant to the fundraiser hosted by David Stein on behalf of Senator Gary Hart on Sunday, February 12, at the Pacific Club in Newport Beach:

-- Late check for $250 from Bernie Schneider

-- Contribution list and photocopies of the checks received at the reception. (Doug Rosen took the checks that evening)

-- Attendance register

-- Photocopy of news article in The Register about the reception.

We have also secured individual sponsors to pay for the costs of the reception (approximately $750), documentation of which I will forward to you shortly. At that time, I will also send you copies of thank you letters from David that are being sent to the contributors.

In the meantime, we are putting together a slate of Convention delegates from the five congressional districts in Orange County and will forward the completed forms to you as soon as possible.

Looking forward to victory in New Hampshire!

Yours truly,

Chris

Chris Townsend

CT/gs

enclosures

CAMILLA KOCOL
EUGENE KOCOL
2019 W. 35TH ST.
SAN PEDRO, CA 90732

868

4-1 19 84

16-4/1220

Pay to the order of The Pacific Club $115.72

One Hundred Fifteen and 72/100 Dollars

TO LATCU LOS ANGELES TEACHERS CREDIT UNION

For Feb-12 Day Hart Camilla Kocol

[redacted]

9304532443

STEIN BRIEF GROUP

March 28, 1984

Mr. Doug Rosen
"Americans With Hart"
507 8th Street, S.E.
Washington, D.C. 20003

Dear Doug:

On behalf of Mssrs. David Stein, Bernie Schneider, and Stuart Karl of the Orange County Hart Campaign enclosed please find a contribution schedule and photocopies of checks totaling $5,346.00 payable to "Americans With Hart". This information was sent to your Denver office.

Per my conversation with Liza Mientus, it is my understanding that the following National Finance Committee account codes have been established for these gentlemen:

David Stein	CAFC02
Stuart Karl	CAFC03
Bernie Schneider	CAFC43

In addition, we have requested that a fourth National Finance Committee account code be established for Mr. Harvey Englander of Orange County. Ms. Mientus has determined that CAFC45 will be the code number for Mr. Englander.

Our objective is to achieve balances in all four of these accounts in excess of the $25,000.00 threshold level. Since Mr. Stein has already exceeded this level, we are asking that the enclosed contributions be credited to the account of Mr. Schneider. (Mr. Schneider's code has been written on each of the checks.)

If you have any questions, or desire additional information, please feel free to contact me.

Yours truly,

Chris Townsend

Chris Townsend
Executive Assistant

cc:pt
Enclosures
cc: Pudge Benkel
John Emerson

AMERICANS WITH HART

SCHEDULE OF CONTRIBUTIONS

RAISED IN ORANGE COUNTY

CREDITED TO BERNIE SCHNEIDER

CODE #CAFC43

Pam Tanner	$ 21.00
Jeffrey A. Schuntz	100.00
Brad McGirr	100.00
Catherine Beilock	200.00
Maria Stokes	50.00
Beverly Cohen	25.00
Laurie Newby	20.00
Laurie Marine	25.00
Jeanne Mozingo	25.00
Ann Louise Haley	50.00
Barbara Healy	25.00
Steve Epstein	100.00
James G. Corey	100.00
Howard Siegel	1,000.00*
Roger Torriero	500.00
Phillip Petty	25.00
Daniel Rasmus	50.00
Dan Kessler	10.00
Mary Parker	100.00
Donald Drozd	100.00
Jack Adelman	1,000.00*
Dorthy Callison	10.00
Dan Miller	300.00
Pamela McSweeney	75.00
Christy Leth	25.00
Jay Young	100.00
Darlene Hibbs	100.00
Michael Davis	100.00
Frieda Werner	10.00
Laurie Marine	50.00
Kim Carrasco	25.00

9304353245

Dale Bohls		$ 25.00
Willie Spears		25.00
Shirley Demedenko		25.00
Mary M. Kunz		25.00
James G. Corey		400.00*
Lisa Mark		100.00
Kurt Hanfelner		50.00
Dennis DeSnoo		100.00
Laurie Holmstedt		50.00
Camille Drey		125.00
	TOTAL	$ 5,346.00

*Individual has reached contribution limit.

9304353246

CAFC43 2968

[redacted] 13,84

[redacted] FOR HARTS 25 NO

TWENTY-FIVE AND 100

PACIFIC NATIONAL BANK

[redacted] Laurie G. Marvin

[redacted]

CAFC43 1404

J. DAVID MOZINGO, D.D.S.
JEANNE MOZINGO
[redacted]

[redacted] 3-2-19 [redacted]

[redacted] Hart $25-

[redacted] DOLLARS

SECURITY PACIFIC NATIONAL BANK

[redacted]

[redacted]

CAFC43 1272

ANN LOUISE HALEY
PAUL A. LOOP
[redacted]

[redacted] March, 1984

[redacted] 30 30

[redacted] DOLLARS

BANK OF AMERICA

[redacted]

[redacted]

CAFC43 1975

BARBARA E. HEALY
[redacted]

3/14/1984

[redacted] Hart $25 00/100

[redacted] DOLLARS

WELLS FARGO BANK

Barbara E Healy

[redacted]

9304353244 7

MILTON M. BEILOCK
CATHERINE L. BEILOCK
[redacted]
ORANGE, CA

CAFC43 1974
3-19 , 84
18-55/1220

PAY TO THE ORDER OF Americans with Heart 200.00
Two Hundred and 00/100 DOLLARS

BANK OF AMERICA
ORANGE HILLS BRANCH
[redacted]
ORANGE, CA

Catherine L Beilock

[redacted]

MARIA STOKES
[redacted]
YORBA LINDA, CA 92686

CAFC43 231
3-19 1984
184/1220

PAY TO THE ORDER OF Americans with Heart $ 50.00xx
Fifty and 00xx DOLLARS

SECURITY PACIFIC NATIONAL BANK
Yorba Linda Office
19601 Yorba Linda Boulevard
Yorba Linda, CA 92686

FOR [redacted]

Maria Stokes

JACK M. COHEN
BEVERLY COHEN
[redacted]
FOUNTAIN VALLEY, CA 92708

CAFC43 2055
3-19 1984
16-3428/1220

PAY TO THE ORDER OF American Heart $ 25.00
Twenty-five and 00/100 DOLLARS

TOKAI BANK
OF CALIFORNIA

Beverly Cohen

MEMO [redacted]

LAURIE F NEWBY
[redacted]
CORONA, CA 91720

CAFC43 0423
Mar 19 1984
16-66/1220

PAY TO THE ORDER OF American Heart/Christmas 20.00
DOLLARS

BANK OF AMERICA
NEWPORT BRANCH
[redacted]
NEWPORT BEACH, CA

Laurie F Newby

9304353244 8

SEAL BEACH, CA 90740

Americans w/ Hart 100.00
One Hundred and 00/100 ——

VALENCIA BANK ALPHA 24
Campaign contribution

[redacted]

STEVE K. EPSTEIN
202 RUBY ST
BALBOA ISLAND, CA 92662

CAFC43 226

3/21 19 84

PAY TO THE ORDER OF Americans w/ Hart $ 100.00

One Hundred Dollars

Great American Federal
A Corporate Place Dr
Newport Beach, California 92660

Kelly Campaign 2 Tickets

[redacted]

COREY & SCHROEDER ENT
17338 SAN RAFAEL
FOUNTAIN VALLEY, CA 92728

Sharon Advertising Execution

CAFC43 1004
Bernie Schneider

3/19 19 84

PAY TO THE ORDER OF Americans With Hart $ 100.00

One Hundred DOLLARS

IRVINE HOUSE
FOUNTAIN VALLEY OFFICE
17572 MAGNOLIA AVENUE
FOUNTAIN VALLEY, CA 92708

FOR Campaign Cont.

Sharon Schneider

[redacted]

HOWARD A. SIEGEL
[redacted]
65 BELCOURT DRIVE NORTH
NEWPORT BEACH, CA 92660

CAFC43 2112
Bernie Schneider
3/21 19 84

Pay to the order of AMERICANS WITH HART $ 100.00

ONE THOUSAND

WESTERN EMPIRE

For

[redacted]

First Interstate
Newport Center Office
Newport Beach, CA 92660

AMERICANS FOR HART

[redacted]

CAFC43
Bernie Schneider
3/21/84
$100.00

930435324449

DONALD L. DRO...
ATTORNEY AT LAW

CAFC43 Bernie Schneider

ONE HUNDRED AND ...

...84 AMERICANS WITH HART

LOAN - CONTRIBUTION

Donald L. Dro...

MARY L. PARKER

CAFC43 Bernie Schneider
1085
3-19-84

$ 100.00

F&M BANK

DAN KESSLER
582 FRANKLIN
MONTEREY, CA 93940

CAFC43
Bernie Schneider 227
3-21-84 11-35/1210

...Hart $20.00

BANK OF AMERICA

Wells Fargo Bank
TORRANCE-DEL AMO OFFICE
21323 HAWTHORNE BLVD., TORRANCE, CA 90503

CAFC43 ...
16-24/60
12207
...

Americans with Hart
Dollars

...0589 0605

JUDGE PHILLIP A. PETTY OR
JOAN S. PETTY

CAFC43 Bernie Schneider
1828
3-20-84

...th Hart $25.00

...no/00 DOLLARS

FIDELITY FEDERAL

93043532450

93043532451

PAMELA M. McSWEENEY
[redacted]
31013 GANADA
RANCHO PALOS VERDES, CA 90274

CAFC43 Bernie Schneider 163

PAY TO THE ORDER OF AMERICANS W. TH HART $ 75.00

Seventy-five and 00/100 DOLLARS

SECURITY PACIFIC NATIONAL BANK
Eastview Office #0238
29227 S. Western Ave. San Pedro, CA 90732

FOR [redacted]

[redacted]

CHRISTY LETH
[redacted]
[redacted] VERONA ST.
SAN DIEGO, CA 92109

CAFC43 [redacted]

PAY AMERICANS W TH HART

TWENTY-FIVE DOLLARS

SECURITY PACIFIC NATIONAL BANK
Office #0420
San Diego, CA 92109

First Interstate Bank

First Interstate Bank of California
Santa Ana Main Office
1518 North Main Street
Santa Ana, CA 92701

CAFC43 [redacted] 2486
3-20 84 Bernie Schneider

Pay to the Order of Americans with Heart $ 300.00

Three Hundred and no/100 Dollars

Daniel T. Miller
2219 N. Baker
Santa Ana, Ca 92706

[redacted]

DOROTHY B. CALLISON
[redacted]
1101 N. RAYMOND AVE.
FULLERTON, CA 92631

CAFC43 Bernie Schneider 2597
March 12, 19 84

PAY TO THE ORDER OF Americans with Heart $ 75.00

Seventy-five and no/100 DOLLARS

SECURITY PACIFIC NATIONAL BANK
East Fullerton Office
2518 E. Chapman Ave. Fullerton, CA 92631

Dorothy B. Callison

[redacted]

JACK ADELMAN
25820 TERRA BELLA
LAGUNA HILLS, CA 92653

CAFC43 Bernie Schneider 1549
March 20, 84

PAY TO THE ORDER OF Americans with Heart $4,000.00

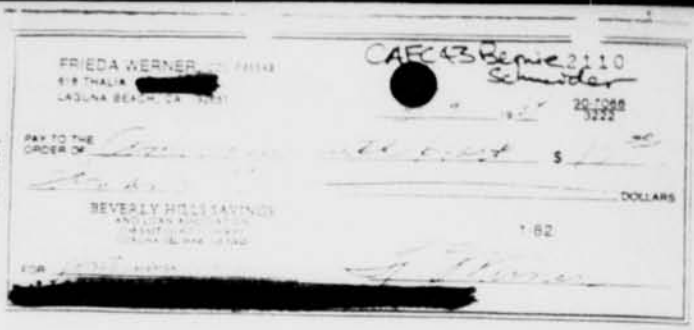
Four-Thousand and no/100 DOLLARS

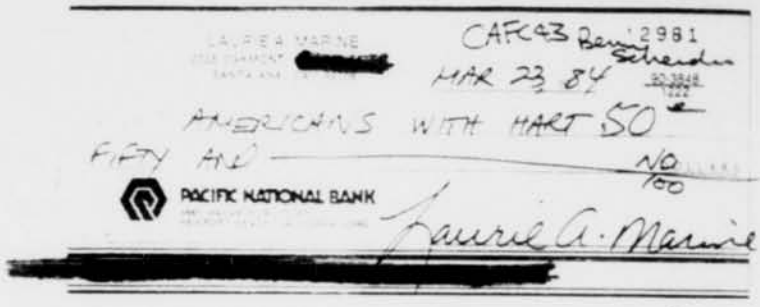
THE LAGUNA BANK N.A.

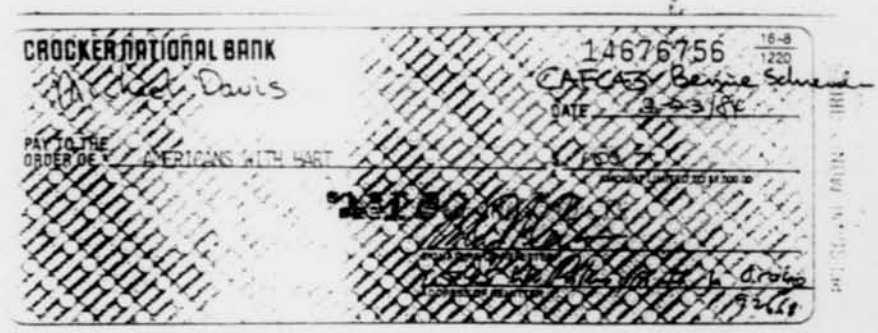
FOR Political Donation

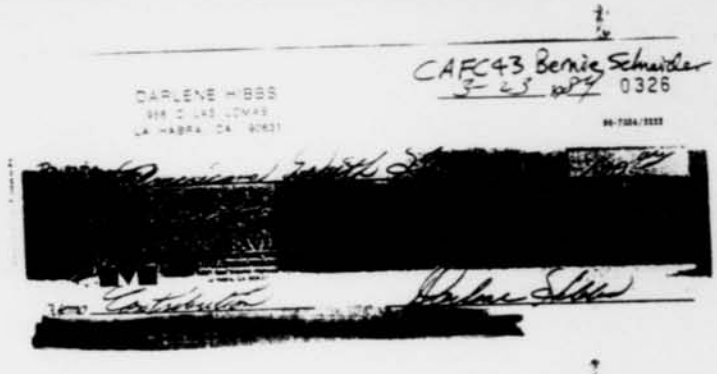
Jack Adelman

[redacted]

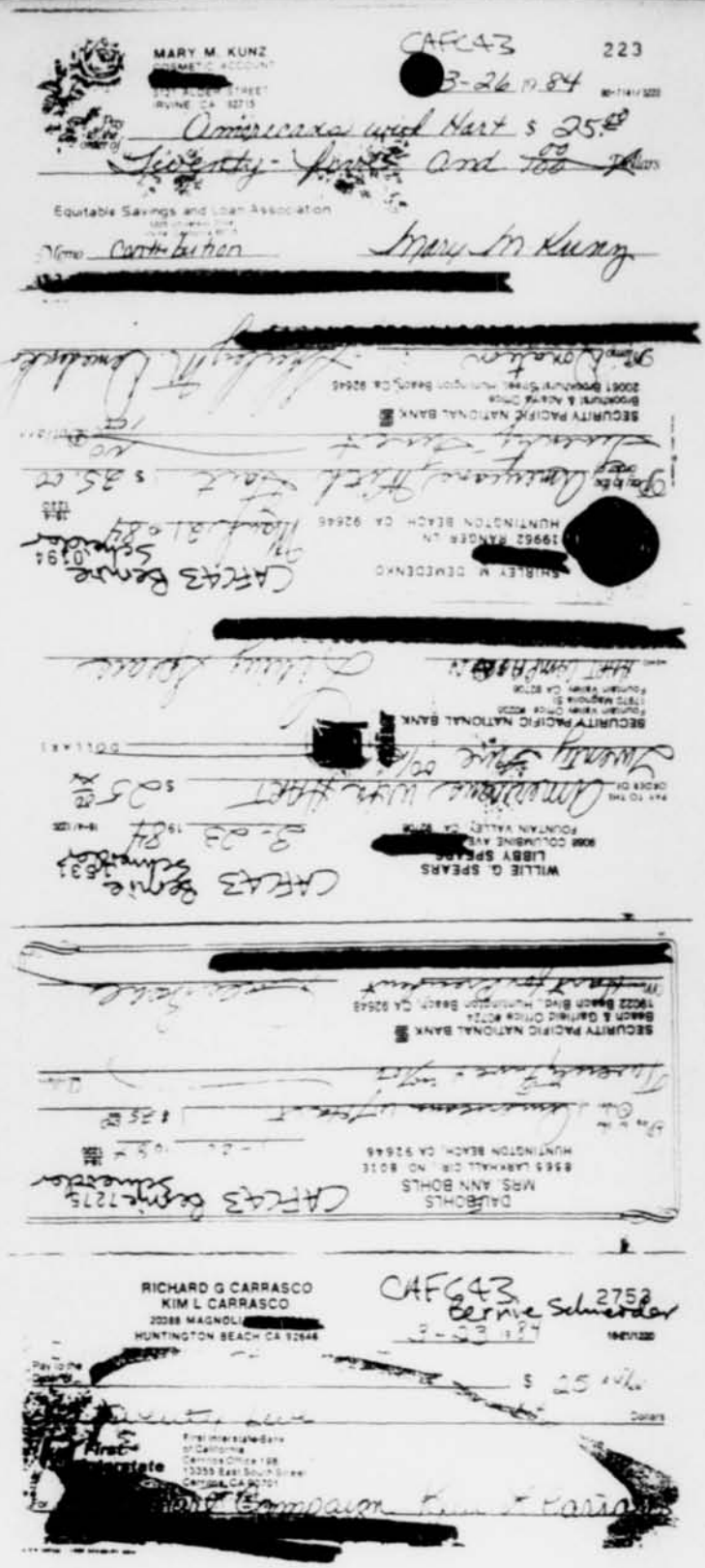








9304353245 52



MARY M. KUNZ
[redacted]
IRVINE CA 92715

CAFC43 223
3-26 1984

America's Wild Heart $ 25.00
Twenty-five and 00/100 Dollars

Equitable Savings and Loan Association

Memo Contribution

Mary M Kunz

[redacted]

SECURITY PACIFIC NATIONAL BANK
Brookhurst & Adams Office
20061 Brookhurst Street, Huntington Beach, CA 92646

CAFC43 Bernie Schneider 0194

SHIRLEY M DEMODENKO
19962 RANGER LN
HUNTINGTON BEACH CA 92646

SECURITY PACIFIC NATIONAL BANK

CAFC43 Bernie Schneider 1831

WILLIE G. SPEARS
LIBBY SPEARS
[redacted] COLUMBINE AVE
FOUNTAIN VALLEY, CA [redacted]

SECURITY PACIFIC NATIONAL BANK
Beach & Garfield Office #0724
19022 Beach Blvd., Huntington Beach, CA 92648

CAFC43 Bernie Schneider 1275

DALE BOHLS
MRS. ANN BOHLS
8565 LARKHALL CIR. NO. 8016
HUNTINGTON BEACH, CA 92646

RICHARD G CARRASCO
KIM L CARRASCO
20288 MAGNOLIA [redacted]
HUNTINGTON BEACH CA 92646

CAFC43 Bernie Schneider 2752

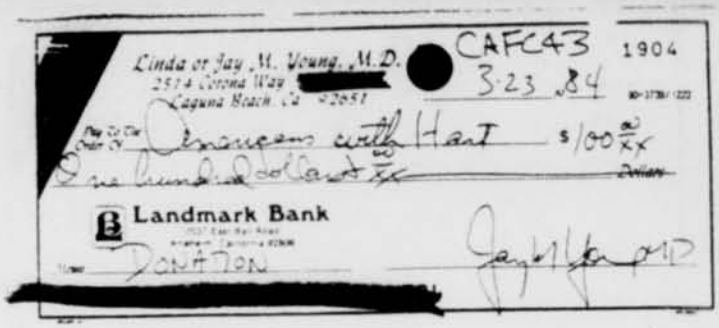
$ 25 00/100 Dollars

First Interstate Bank of California
Service Office 198
13355 East South Street
Cerritos, CA 90701

For Campaign

9304353532453

9304353245 54



Linda or Jay M. Young, M.D.
2514 Corona Way
Laguna Beach, Ca 92651

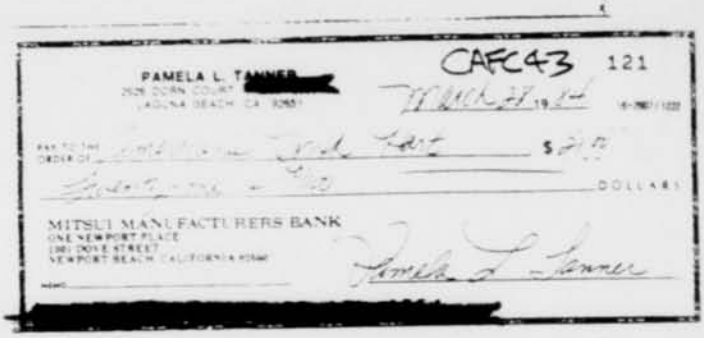
CAFC43 1904
3-23 84

Pay to the Order of Americans with Heart $100 00/xx
One hundred dollars xx Dollars

Landmark Bank
Newport Beach California 92660

Memo DONATION

Jay M Young MD



PAMELA L. TANNER
2626 DORN COURT
LAGUNA BEACH, CA 92651

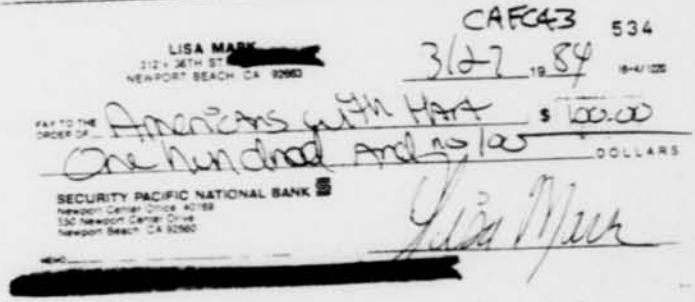
CAFC43 121
March 27 1984

Pay to the Order of [illegible] $2[illegible]
[illegible] Dollars

MITSUI MANUFACTURERS BANK
ONE NEWPORT PLACE
1301 DOVE STREET
NEWPORT BEACH, CALIFORNIA 92660

Memo [illegible]

Pamela L Tanner



LISA MARK
312 36TH ST
NEWPORT BEACH, CA 92663

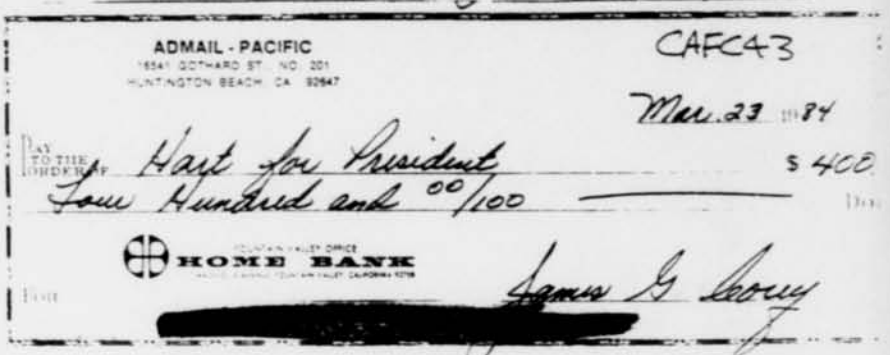
CAFC43 534
3/27 1984

Pay to the Order of Americans with Heart $100.00
One hundred and 00/100 Dollars

SECURITY PACIFIC NATIONAL BANK
Newport Center Office 40169
150 Newport Center Drive
Newport Beach, CA 92660

Memo [illegible]

Lisa Mark



ADMAIL - PACIFIC
16541 GOTHARD ST. NO. 201
HUNTINGTON BEACH, CA 92647

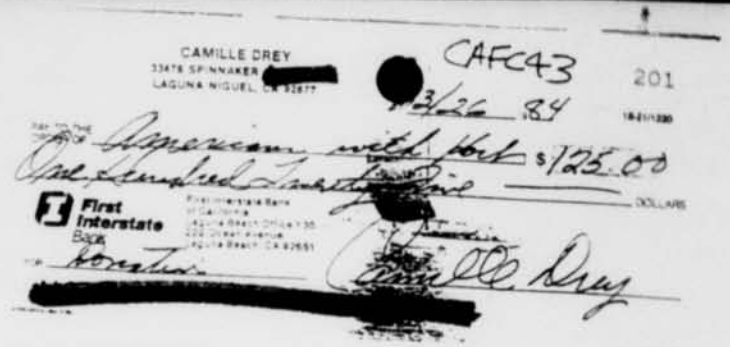
CAFC43
Mar. 23 1984

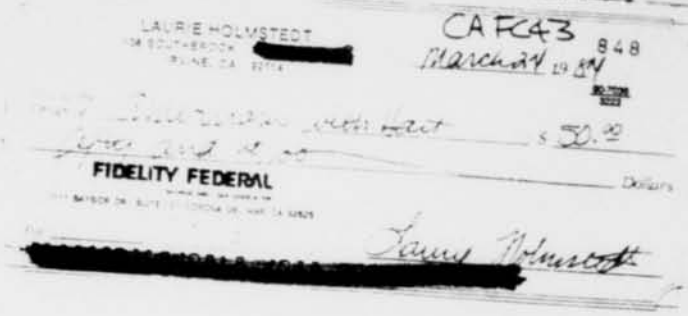
Pay to the Order of Hart for President $400
Four Hundred and 00/100

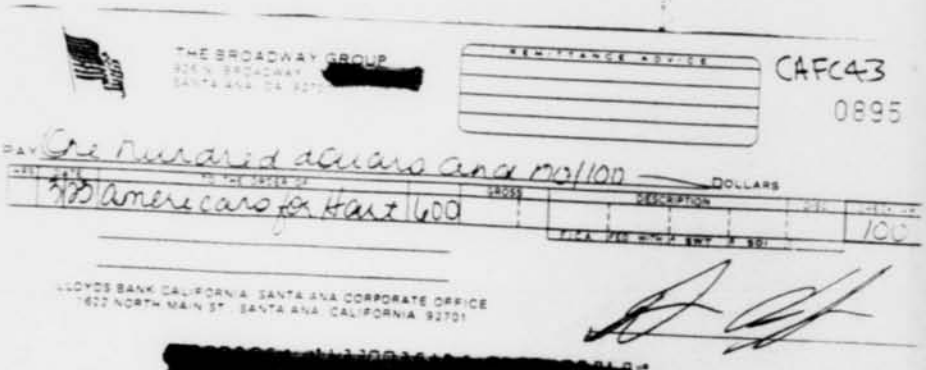
HOME BANK
Fountain Valley Office
Fountain Valley, California 92708

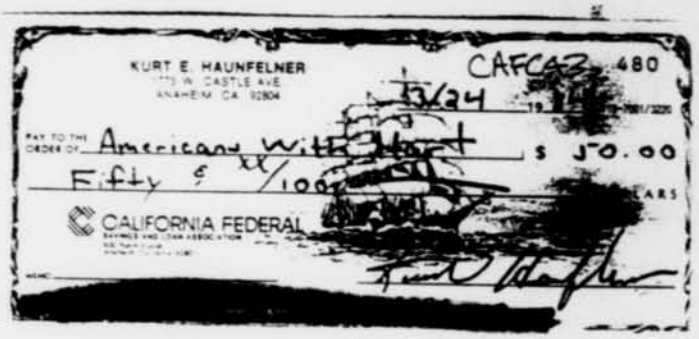
For [illegible]

James G Young


CAMILLE DREY
[redacted]
CAFC43 201
3/26 84
Americans with Hart $125.00
One Hundred Twenty-Five
First Interstate Bank
Camille Drey
[redacted]


LAURIE HOLMSTEDT
[redacted]
CAFC43 848
March 24 19 84
$ 50.00
FIDELITY FEDERAL
[redacted]


THE BROADWAY GROUP
[redacted]
REMITTANCE ADVICE
CAFC43
0895
PAY One Hundred dollars and no/100 DOLLARS
Americans for Hart 100
LLOYDS BANK CALIFORNIA SANTA ANA CORPORATE OFFICE
1600 NORTH MAIN ST. SANTA ANA, CALIFORNIA 92701
[redacted]


KURT E. HAUNFELNER
[redacted]
CAFC43 480
3/24
PAY TO THE ORDER OF Americans With Hart $ 50.00
Fifty & xx/100
CALIFORNIA FEDERAL
[redacted]

9304355324555

STEIN BRIEF GROUP

March 19, 1984

Mr. Doug Rosen
"Americans With Hart"
507 8th Street, S.E.
Washington, D.C. 20003

Dear Doug:

On behalf of Mr. David Stein, enclosed please find photo copies of checks totaling $1,235.00 payable to "Americans With Hart" and a schedule of contributions raised in Orange County by David Stein. This information was sent to your Denver office.

These checks were mailed via Federal Express at 6:00 p.m. on Tuesday, March 20 and should be received in Denver on Wednesday, March 21.

Yours truly,

Chris Townsend

Chris Townsend
Executive Assistant

CT:pt
Enclosures
cc: John Emerson
Pudge Hinkel

29982 Ivy Glenn, Suite One Hundred • Laguna Niguel, CA 92677 • (714) 859-6995

AMERICANS WITH HART

SCHEDULE OF CONTRIBUTIONS

RAISED IN ORANGE COUNTY

BY DAVID STEIN

3/16/84	Thelma Bradshaw		$ 25.00
	Gladys Hanes		50.00
	Emily Harrison		25.00
	Joseph Cordero		200.00
	John Hanna		100.00
	Jeffrey Baird		75.00
	Jimm Bacin		20.00
	Tom Stephenson		400.00
	Robert Scheldrup		50.00
	Charles E. Burt		40.00
	Robert Lawson		50.00
	Gladys Hanes		200.00
		TOTAL	$1,235.00

9304353245 57

THOMAS E. HANES
GLADYS P. HANES
22351 FIRST AVE.,
SOUTH LAGUNA, CA 92677

CAFCOZ David Stein 541
March 19 84
16-21/1220

Pay to the order of Americans for Hart $200.00/100
Two Hundred 00/100 Dollars

First Interstate Bank
First Interstate Bank of California
Laguna Niguel Office # 221
Six Monarch Bay Plaza
South Laguna, CA 92677

The Official Bank of The 1984 Olympics

For [redacted] Gladys P. Hanes

CAFCOZ David Stein
3456

THELMA A. BRADSHAW
620-A THALIA ST.
LAGUNA BEACH, CA 92651

Mar 12 1984
90-3175/1222 32

PAY TO THE ORDER OF AMERICANS WITH HART $ 25 00/100
TWENTY-FIVE DOLLARS

Southwest Bank
800 Glenneyre
Laguna Beach, California 92652

MEMO [redacted] Thelma A. Bradshaw

930435324558

JIMM F. BACIN
291 SPINNAKER
ORANGE, CA 92668

CAFCOZ David Stein
1111

10 Mar 1984
16-24/833
1220(7)

Pay to the Order of [redacted] W. th Hart $ 20.00
Twenty and no/100's Dollars

ORANGE PLAZA OFFICE
WELLS FARGO BANK
NATIONAL ASSOCIATION
301 E. CHAPMAN AVENUE
ORANGE, CALIFORNIA 92668

[redacted]

CHARLES E. BURK
[redacted]
47015 E. FLORIDA AVE.
HEMET, CA 92343

CAFCOZ David Stein 1786
March 15 1984
16-CC/1220

Pay to the order of Americans With Hart $ 40.00
Forty dollars & 00/100 Dollars

BANK OF AMERICA
HEMET BRANCH 1065
1687 EAST FLORIDA AVENUE
P. O. BOX 1406
HEMET, CA 92343

Charles Burk

ROBERT J. SCHELDRUP
[redacted]
372 S. PINE
ORANGE, CA 92666

CAFCO2 David Stein 454
March 15 19 84 16-66/1220

PAY TO THE ORDER OF Americans with Hart $ 50.00
fifty and no/100 DOLLARS

BANK OF AMERICA
ORANGE MAIN OFFICE 233
348 EAST CHAPMAN AVENUE
P. O. BOX 40
ORANGE, CA 92669

benefit concert

Robert J. Scheldrup

[redacted]

THOMAS E. HANES
GLADYS P. HANES
22351 FIRST AVE. [redacted]
SOUTH LAGUNA, CA 92677

CAFCO2 David Stein 524
March 8 19 84 16-21/1220

Pay to the order of Americans With Hart $ 50. 00/100
Fifty Dollars and 00/100 Dollars

First Interstate Bank
First Interstate Bank of California
Laguna Niguel Office # 221
Six Monarch Bay Plaza
South Laguna, CA 92677

The Official Bank of The 1984 Olympics

For Gladys P. Hanes

[redacted]

9300435324559

JEFFREY S. BAIRD
JANET S. LONG-BAIRD
7170-A MELROSE [redacted]
BUENA PARK CA 90621

CAFCO2 David Stein 1342
March 3 19 84 16-21/1220

Pay to the Order of Gary Hart for President $ 75.00
seventy five and 00/100 Dollars

First Interstate Bank
First Interstate Bank of California
Buena Park Office 205
7501 Commonwealth Avenue
Buena Park, CA 90621

For Jeff Baird

[redacted]

EMILY HARRISON
[redacted]
2601 N. GRAND AVE. NO 206
SANTA ANA, CA 92701

CAFCO2 David Stein 641
MARCH 9 19 84 16-7000/3220

PAY TO THE ORDER OF AMERICANS WITH HART $ -25 00-
TWENTY-FIVE AND NO/100 DOLLARS

HOME SAVINGS OF AMERICA
[redacted] ORANGE OFFICE 125
[redacted] N TUSTIN AVE. ORANGE, CA 92667

MEMO

Emily Harrison

[redacted]
KATHLEEN STEPHENSON
24696 MENDOCINO CT. [redacted]
LAGUNA HILLS, CALIFORNIA 92653

3-13 19 84 16-21/339 1220

PAY TO THE ORDER OF Americans With Hart $ 400 —

Four Hundred DOLLARS

First Interstate Bank

First Interstate Bank of California
Culver & Walnut Office
14468 Culver Drive
Irvine, CA 92714

MEMO donation

Jon Stephenson

[redacted]

JOHN R. HANNA
3882 HENDRIX ST [redacted]
IRVINE, CA 92714

CAFCO2 David Stein 2773

3/10 19 84 75-532/919

Pay to the Order of Americans with Hart $ 100.00

One Hundred and no/100 Dollars

TO ORANGE COUNTY POSTAL/FEDERAL EMPLOYEES CREDIT UNION
13902 Harbor Boulevard
Garden Grove, California 92643
Payable Through First Bank (N.A.) St. Cloud, MN

for _____

[redacted]

Merrill Lynch Cash Management Account

CAFCO2 David Stein 660

JOSEPH R. CORDERO
LINDA M. CORDERO
18020 MARK LANE
YORBA LINDA, CA 92686

March 9, 1984 25-80 440

Pay to the order of Americans With Hart $ 100.00

One Hundred Dollars

BANK ONE.
BANK ONE OF COLUMBUS, N.A.
Columbus, Ohio 43271

For _____

⑈044000804⑈ 30[redacted]29⑈ 0660

Merrill Lynch Cash Management Account

CAFCO2 David Stein 661

JOSEPH R. CORDERO
LINDA M. CORDERO
18020 MARK LANE
YORBA LINDA, CA 92686

March 9, 1984 25-80 440

Pay to the order of Americans with Hart $ 100.00

One Hundred Dollars

BANK ONE.
BANK ONE OF COLUMBUS, N.A.
Columbus, Ohio 43271

For _____

⑈044000804⑈ 30[redacted]29⑈ 0661

930435324600

robert lawson, structural engineers
312 OCEAN AVENUE · LAGUNA BEACH, CA 92651 · (714) 494-0776

CAFCO2 3441
David Stein

CITY NATIONAL BANK
LIDO VILLAGE OFFICE 3388 VIA LIDO
NEWPORT BEACH, CALIFORNIA 92663

16-1606
1220

PAY Fifty and 00/100 DOLLARS

TO THE ORDER OF Stay Hart for President committee

DATE	CHECK NO.	AMOUNT
3/14/84	3441	50 00

AUTHORIZED SIGNATURE

[redacted]

[redacted]

930435324611

STEIN BRIEF GROUP

March 9, 1984

Mr. Doug Rosen
"Americans With Hart"
507 8th Street, S.E.
Washington, D.C. 20003

Dear Doug:

On behalf of Mr. David Stein, enclosed please find photo copies of checks totaling $3,275.00 payable to "Americans With Hart" and a schedule of contributions raised in Orange County by David Stein. This information was sent to your Denver office.

These checks were mailed via Federal Express at 6:00 p.m. on Friday, March 9 and should be received in Denver on Saturday, March 10.

Yours truly,

Chris Townsend

Chris Townsend
Executive Assistant

CT:pt
Enclosures
cc: John Emerson
Pudge Hinkel

29982 Ivy Glenn, Suite One Hundred • Laguna Niguel, CA 92677 • (714) 859-6995

AMERICANS WITH HART
SCHEDULE OF CONTRIBUTIONS
RAISED IN ORANGE COUNTY
BY DAVID STEIN

3/9/84	Hardy Blackman		$ 25.00
	Joanne Yusi		500.00
	Ava Stein		1,000.00
	Paul Cohen		250.00
	Carrie Garland		500.00
	Jean Harrington		200.00
	David Cohen		100.00
	Susi Vinsel		100.00
	Patricia Hood		50.00
	Kathy Clark		25.00
	Lee Weider		50.00
	Ron Edwards		25.00
	Mark Hoagland		50.00
	Jean Smith		25.00
	Phil Beukema		100.00
	Carl Husbands		250.00
	Lucille Grothe		25.00
		Total	$3,275.00

9304353246463

YEISER-GARLAND & ASSOCIATES
3187 H AIRWAY AVENUE
COSTA MESA, CALIFORNIA 92626
(714) 754-0241

REMITTANCE ADVICE

1667
CAFCOZ David Stein

PAY THE SUM 500 00 DOLLARS

DATE		CHECK NO.	NET AMOUNT
3/84	CHECK FOR FIRST	1667	500

BASEOPS

FIRST LOS ANGELES BANK Orange County Regional Office
4685 MacARTHUR COURT NEWPORT BEACH, CALIFORNIA 92660

[redacted]

930453532464

PHIL BEUKEMA
30801 PACIFIC COAST HWY. NO. 36
LAGUNA BEACH, CA 92651

CAFCOZ David stein 110

3-4 1984 164/1220

PAY TO THE ORDER OF Americans for Hart $ 100.00

One hundred and 00/100 DOLLARS

SECURITY PACIFIC NATIONAL BANK
South Laguna Office
30812 Coast Hwy., South Laguna, CA 92677

FOR Campaign Contrib. Phil Beukema

[redacted]

LUCILLE GROTHE
11872 FALLINGLEAF CIR.
GARDEN GROVE, CA [redacted]

CAFCOZ David stein 1528

March 5 1984 16-4/1220

PAY TO THE ORDER OF Americans for Hart $ 25.00/100

Twenty-five and 00/100 DOLLARS

SECURITY PACIFIC NATIONAL BANK
City Centre Office #0155
Two City Blvd. East
Orange, CA 92668

MEMO Lucille Grothe

[redacted]

[redacted] [redacted]

33855 Olinda Dr. [redacted]
Dana Point Ca 92629

Stein 214

3/7 19 84 16-21/130 1220

Pay to the Order of AMERICANS FOR HART $ 250.00

two-hundred and fifty ——— Dollars

First Interstate Bank

First Interstate Bank of California
Laguna Beach Office
222 Ocean Avenue
Laguna Beach, CA 92651

Carl B. Hoagland

[redacted]

WILLIAM G. SMITH
JEAN M. SMITH
13481 FAIRFIELD LN. [redacted]
SEAL BEACH CA 90740

CAFCOZ David Stein 165

March 19 84 16-21/1220

Pay to the Order of Americans With Hart $ 25.00

Twenty-five and no/100 ——— Dollars

First Interstate Bank

First Interstate Bank of California
Seal Bch. Leisure World Office 110
13916 Seal Beach Boulevard
Seal Beach, CA 90740

For

Jean M. Smith

[redacted]

MARK S. HOAGLAND
8 NORTH WIND COURT [redacted]
NEWPORT BEACH, CA 92663

CAFCOZ David Stein 124

3/4 19 84 90-7035/3222

PAY TO THE ORDER OF Americans With Hart $ 50.00

Fifty Dollars and no cents DOLLARS

DOWNEY SAVINGS AND LOAN ASSOCIATION

COSTA MESA OFFICE
360 E. 17TH STREET
COSTA MESA, CALIFORNIA 92627

Campaign Contribution Mark S. Hoagland

[redacted]

LELAND E. WIEDER
DIANE WIEDER
17082 PLEASANT CIRCLE [redacted]
HUNTINGTON BEACH, CA 92649

CAFCOZ David Stein 1498

3-3 84 90-7054/3222

PAY TO THE ORDER OF AMERICANS WITH HART $ 50.00

FIFTY & xx/00 DOLLARS

MERCURY SAVINGS

EXECUTIVE OFFICES
7812 Edinger Avenue
Huntington Beach, CA 92647

L E Wieder

[redacted]

930435324655

MICHAEL P. CLARK
KATHERINE W. CLARK
5711 SIERRA CIELO
IRVINE, CA 92715

CAFCO2 David Stein 310

Date March 6 1984 90-7001/3222

Pay to the order of Americano with Hard $25.00

Twenty five and no/100 Dollars

Irvine Office
4543 Campus Drive
Irvine, CA
HOME FEDERAL 92715

Memo Signature Katherine W. Clark

[redacted]

RON EDWARDS
EDWARDS ENTERPRISES
P. O. BOX 855
LAGUNA BEACH, CA 92652
PHONE (714) 497-2020

CAFCO2
David Stein

7282

BANK OF AMERICA NT & SA
LAGUNA BEACH OFFICE
[redacted] OCEAN AVE. LAGUNA BEACH, CA 92651

1666
1220

PAY Twenty five & no/100 DOLLARS

DATE	CHECK NO.	AMOUNT
7282	7282	25 00

TO THE ORDER OF Gary Hart for President Campaign Fund.

Ronald Edwards
AUTHORIZED SIGNATURE

[redacted]

9304353246666

RAYMOND S. YUSI
JOANNE PELOSO
239 VIA RANCHO [redacted]
SAN CLEMENTE, CA 92672

CAFCO2 1878
DAVID STEIN

3-6- 19 84 90-3796 1222

PAY TO THE ORDER OF Americans with Hart $500 00 xx

Five Hundred & no/100 DOLLARS

MONARCH BANK
[redacted]
Laguna Niguel, California

Charter Account

FOR Hart Campaign

[redacted]

CAFCOZ
390 David Stein

HARDY BLACKMAN
12952 CIVIC CTR DR
GARDEN GROVE, CAL
92640

DATE 3-2-87

16-66/1220

PAY TO THE ORDER OF [redacted] DOLLARS

BANK OF AMERICA
LONG BEACH PACIFICA BRANCH
650 BELLFLOWER BLVD. LONG BEACH, CA 90814

[redacted]

9304353244667

FROM THE ACCOUNT OF

JAMES L. HOOD
PATRICIA A. HOOD
2224 E. LA PALMA AVE.
ANAHEIM, CA 92806

CAFCOZ David Stein
[redacted]
2226

16-24/667
1220(7)

3-5- 19 87

PAY TO THE ORDER OF [redacted] $ 50.00

Fifty & no/100 DOLLARS

STATE COLLEGE OFFICE
220 S. STATE COLLEGE BLVD., ANAHEIM, CA 92806
WELLS FARGO BANK
NATIONAL ASSOCIATION

Pat Hood
Not valid unless signed

[redacted]

CAFCOZ David Stein

SUSI K. VINSEL
[redacted]
8322 ARTISTA DR.
HUNTINGTON BEACH, CA 92646

3-1 19 87 0225

90-7181/3223

PAY TO THE ORDER OF [redacted] $ 100.00

[redacted] Dollars

HUNTINGTON SAVINGS

[redacted]

Susi (Vinsel)

[redacted]

CAFCO2
David Stein

EH-

MARCH 2 , 84

AMERICANS WITH HEART

* * * *

DAVID PAUL COHEN

[redacted] SANTA FE NEW MEXICO 87501

[redacted]

CAFCO2 David Stein
342

JEAN E. HARRINGTON 0982
2007 HIGHLAND DR.
[redacted]
NEWPORT BEACH, CA 92660

3-2 19 84 90-7148 / 3222

PAY TO THE ORDER OF Jane Hart Election Campaign $ 200.00

Two Hundred and 00/100 DOLLARS

NEWPORT BALBOA Savings
Westcliff Plaza
1100 Irvine Avenue
Newport Beach,
California 92663

FOR [redacted]

Jean Harrington

[redacted]

CAFCO2 David Stein 1747

2/ 10 84 11-35/1210

Pay to the Order of Americans with Heart $1000.00

One Thousand Dollars

BANK OF AMERICA
TAHOE CITY BRANCH 0609
215 NORTH LAKE BOULEVARD
P.O. BOX 11
TAHOE CITY, CA 95730

Signed [redacted]

[redacted]

930435324688

PAUL COHEN
[redacted]
274 CLIFF DRIVE
LAGUNA BEACH, CA 92651

CAFC02 David Stein
161

3/2 19 84

90-3848
1222

PAY TO THE ORDER OF Senator Hart $ 250.00

Two hundred fifty only DOLLARS

PACIFIC NATIONAL BANK
4665 MACARTHUR COURT
NEWPORT BEACH, CALIFORNIA 92660

FOR Campaign Contribution [redacted] Paul Cohen

⑈161⑈ ⑆122203848⑆ 93 0435 24469

STEIN BRIEF GROUP

March 2, 1984

Mr. Doug Rosen
Americans With Hart
507 Eighth Street S.E.
Washington, D.C. 20003

Dear Doug:

I want to take this opportunity to report on the status of events surrounding the Gary Hart campaign in Orange County.

First, I would like to update you on our fundraising efforts in Orange County since my return from New Hampshire on Wednesday afternoon. On Wednesday, February 29, at 5:00 p.m., we sent via overnight mail five checks totalling $5,990 to your office in Denver, Colorado. On Thursday, March 1, at 5:00 p.m. we sent via overnight mail 11 checks totalling $9,500 to your Denver office. Today we are sending via overnight mail 35 checks totalling $14,535 to your Denver office. Please see the enclosed contribution schedule and copies of checks for reference.

As a result of our 48-hour effort upon my return to Orange County, I am pleased to announce that we raised a grand total of $30,025 in contributions to Gary Hart.

Moving on to other matters, on the return trip from Manchester to Boston Tuesday evening, I met your Harvard University coordinator, Suzanne Windle. She asked me if I knew Congressman Tony Coehlo and I advised her that I did. She said that Tony had a young aide, George Petrolakus in Modesto, that wanted to take a leave of absence in order to participate in Gary's campaign. Suzanne asked me if I would help get approval for such a move from Tony because George would be a significant addition to the campaign effort.

29982 Ivy Glenn, Suite One Hundred • Laguna Niguel, CA 92677 • (714) 859-6995

I called Tony's office on my return to California and in his absence, I spoke to Michael Mahdesian. The request for George's leave of absence gave me the chance to open a strong dialogue with Tony (so far through Michael) regarding the Hart campaign. I have an effective rapport with Coehlo.

Michael advised me that although Tony would love to help me, Tony was supporting Mondale and that if George was good enough to recruit, then Tony would be hurting Mondale. Michael felt Tony, having committed to Mondale, would not want to do anything counterproductive. However, I gave him a list of reasons why it was important for Tony to cooperate, explained what I was doing for Hart and what I intended for Tony later on this year. He called back today and advised me that Tony said he would give me a firm answer tomorrow but his preliminary indication was that he would let George take a leave of absence to work for Hart.

Michael Mahdesian advised me that he had raised, through the Armenian community, $90,000 for Mondale and I talked to him about getting that support switched as soon as they realize that Mondale couldn't beat Reagan and Hart could. I got the point across that campaign promises from an unelectable nominee doesn't do anyone any good. And, of course, I reminded Michael that because Jimmy Carter's vice-president could bring down a lot of Democratic congressional candidates, that Tony had a responsibility as Chairman of the Democratic Congressional Campaign Committee to join Gary's campaign effort.

The bottom line for us is that in terms of the Armenian support and the Coehlo support, I believe as momentum builds for Gary we will have the ability to move them onto our team. I will attempt to achieve that on an ongoing basis.

I have also spoken to Bob Harmon. In the past, Bob has raised substantial amounts of money for Ted Kennedy in Northern California. Bob decided that, with Kennedy out of the race, he was going to take the year off politically, however, he still raised thousands of dollars for Alan Cranston as a favor to our mutual friend, John Tunney.

I had an effective discussion with Bob about what is happening with the Hart campaign and how excited I am about Gary. By the end of the conversation he was also excited and said he would give the topic serious consideration. I am scheduled to talk to him in ten days. I am tentatively planning to get Bob on the campaign plane following Super Tuesday.

9304353247 1

After talking to John Emerson at length last night, we planned out our short-term strategies. I am going to call John Tunney to help with the effort to recruit him onto the campaign, although I am aware that Gary needs to call John directly.

I am also trying to contact Jane Fonda, a close, personal friend, to get her to support Gary. She also has a strong influence with Barbara Streisand. I understand that Mike Medavoy is working on that. I would like to play a role in getting Streisand's support but don't want to conflict with anything that Mike is doing with her. I also could help with Ed Asner; however, until I hear otherwise, I assume that it would not be advantageous to pursue that at this point.

I sat next to an executive in the electronic/computer industry (a Boston Republican) and told him the Democrats in his industry should support Gary in the Massachusetts primary. He suggested calling the executive director of the "Massachusetts High Tech Council", Kevin Foley, in Boston. He said the two key issues were: 1) the unitary sales tax which would prevent the U.S. electronics industry from competing internationally, and 2) the replacement of D.I.S.C. (Domestic Investment Sales Corp.) with F.S.K., which has something to do with deferring income for tax reasons. If appropriate, you might want someone in Boston to follow through with Foley.

Lastly, we have received dozens of phone calls here at the office and put on temporary help to return the inquiries. We are planning to establish a Hart office within our building and are working with John Emerson to coordinate the details. I had a strategy meeting with a group of young, enthusiastic Hart supporters who are politically hardened and experienced. They are already beginning to organize support, collect local endorsements and raise money. I think their combination of knowledge and enthusiasm will give us an effective grassroots team here in Orange County.

I will be out of the state through next week. However, I will be in constant contact with my office. My executive assistant, Chris Townsend, has been working diligently for the past 15 months on Gary's behalf. He will be coordinating our Orange County activities with John Emerson in my absence. In the event that you need to contact me, please call Chris at my office (714) 859-6995 or at his home (714) 495-4698.

Best regards from California's "Hartland" - Orange County, the bastian of right-wing Republicanism! John Birch, eat your Hart out!

Yours truly,

David Stein

David F. Stein

(CT)

cc: Pudge Hinkel
John Emerson

9304353247 2

AMERICANS WITH HART
SCHEDULE OF CONTRIBUTIONS
RAISED IN ORANGE COUNTY
BY DAVID STEIN

	2/29/84	Dick Schmidt	$ 1,000.00	*
		Chris Townsend	890.00	*
		Phyllis Snyder	100.00	
		Mr. & Mrs. Judith Wyatt	2,000.00	**
		Mr. & Mrs. Nate Stein	2,000.00	**
		Wednesday Sub-Total	$ 5,990.00	
9	3/01/84	Mr. & Mrs. Jim Stout	$ 2,000.00	**
3		Joe Belden	100.00	
0		Gloria Zigner	1,000.00	*
4		Eric Adams	100.00	
3		Daryl Heinly	100.00	
5		Mr. & Mrs. Joe Smith	2,000.00	**
3		Mr. & Mrs. Simon Whitmey	2,000.00	**
2		Mr. & Mrs. Barry Brief	1,000.00	**
4		Mr. & Mrs. Jim Smith	1,000.00	**
7		Sharon Ikemoto	100.00	
3		Denise Waite	100.00	
		Thursday Sub-Total	$ 9,500.00	
9	3/02/84	Joan Westberg	$ 100.00	
3		Dennis DeSnoo	125.00	
0		John Hanna	100.00	
4		Robert Unetic	35.00	
		Kurt Haunfelner	100.00	
		Ken Goldman	500.00	
		Ross Stein	1,000.00	*
		Winnie Peterson	100.00	
		Geoffrey Cahoon	500.00	
		Mike Meyer	500.00	
		Alfreud Wannamater	100.00	
		Gary Wescombe	100.00	
		Peter Capobianco	100.00	
		Jack Oldham	100.00	
		Stan Solomon	100.00	
		Paul Pfeiffer	100.00	
		Ed Lohrbach	500.00	
		Mr. & Mrs. Jerry Brief	2,000.00	**

3/02/84	J. Paul Bowintel	150.00	
	Howard Brief	1,000.00	*
	Bart Thomsen	250.00	
	Lelaine Bushey	1,000.00	*
	Jo Anna Lloyd	250.00	
	Mr. & Mrs. C.K. Knickerbocker	2,000.00	**
	Robert DeLiema	250.00	
	Bernard Feldman	250.00	
	Lee Harrington	250.00	
	Joe Winhelm	250.00	
	Mr. & Mrs. Harvey Englander	1,250.00	**
	Michael Weinberg	250.00	
	James G. Corey	500.00	
	Mary Ann Smith	25.00	
	R.C. Armstrong	100.00	
	Julie Sandler	500.00	
	Juan Avila	100.00	
	Friday Sub-Total	$14,535.00	
	GRAND TOTAL	$30,025.00	

9304353247474

* Individual has reached contribution limit

** Married couple has reached contribution limit

CAFCO2 David Stein
1552

JAMES W SMITH
KATHLEEN C SMITH
33391 COCKLESHELL DR [redacted]
LAGUNA NIGUEL, CA [redacted]

90-3848/1222

19

PAY TO THE ORDER OF

$

DOLLARS

PACIFIC NATIONAL BANK
4965 MACARTHUR COURT
NEWPORT BEACH, CA [redacted]

FOR [redacted]

James W Smith

David Stein
CAFCO2 355

SHARON IKEMOTO
31842 IVY LANE [redacted]
SOUTH LAGUNA, CA 92677

31 1984

90-3293
1222

PAY TO THE ORDER OF Americans for Hart

$ 100.00

One Hundred Dollars

DOLLARS

Newport Center Office
500 Newport Center Drive
Newport Beach, Ca. 92660

AMERICAN STATE BANK

FOR [redacted]

Sharon Ikemoto

David Stein
CAFCO2
1866

D. M. WAITE
[redacted]
3580 SANTA ANA NO E
COSTA MESA CA 92627

19 84

16-4/1220

PAY TO THE ORDER OF Committee with Hart

$ 100.00

One Hundred

DOLLARS

SECURITY PACIFIC NATIONAL BANK
Irvine Office
18622 MacArthur [redacted]

[redacted]

930435324775

RICHARD W. SCHMIDT
[redacted]
34114 SELVA RD., NO. 320
LAGUNA NIGUEL, CA 92677

WITH HA
& NO/100

PACIFIC NATIONAL BANK

ID# C0015251

For [redacted]

DAVID STEIN

CHRIS TOWNSEND
29642 CORAL COVE [redacted]
LAGUNA NIGUEL, CA 92677

183

Feb 29, 19 84

16-4/1220

PAY TO THE ORDER OF Americans With Hart $ 890.00

Eight hundred and ninety and No/100 DOLLARS

SECURITY PACIFIC NATIONAL BANK
Laguna Niguel Office •0274
30202 Crown Valley Parkway, Laguna Niguel, CA 92677

FOR ID# C 0015925 1

Chris Townsend

[redacted]

930435324776

PHYLLIS M. SNYDER
ATTORNEY AT LAW
[redacted] GLENNEYRE 497-5715
LAGUNA BEACH, CA 92651

1611

Feb. 29, 1984 90-7032/3222

Americans With Hart $ 100.00/xx

— One Hundred ——— 00/xx DOLLARS

Santa Barbara Savings
AN ITEL AN ASSOCIATION
[redacted] PACIFIC COAST HIGHWAY
SOUTH LAGUNA, CA 92677

ID# C0015925| Phyllis M. Snyder

[redacted]

930435324777

DAVID STEIN

JUDITH WYATT
29982 IVY GLENN [redacted]
LAGUNA NIGUEL, CA 92677

214

2-21 1984 90-3796/1222

PAY TO THE ORDER OF Americans with Hart $ 2,000.00

Two Thousand 00/100 DOLLARS

MONARCH BANK
30000 Town Center Drive
Laguna Niguel, California 92677

NEW OUTLOOKS CLUB

FOR [redacted] ID#C0015925| Judith Wyatt

[redacted]

DAVID STEIN

NATE STEIN •

108

FEB 21 1984 90-3796/1222

Pay To The Order Of AMERICANS WITH HART $ 2000.00

TWO THOUSAND Dollars

MONARCH BANK

FOR NATE STEIN Nate Stein

[redacted]

ID# C0015925|

JAMES D. STOUT
[redacted]

CAFCO2 David Stein
1251

3-1 84

PAY TO THE ORDER OF Americans for Hart $ 2,000.00

Two Thousand and no/100---------- DOLLARS

PACIFIC NATIONAL BANK
[redacted]
NEWPORT BEACH, CALIFORNIA 92660

FOR [redacted] Norma J. Stout

1:1220247 8 1:3 2 3 5 1 0 1 3 0

JOSIAH G. BELDEN
CERTIFIED PUBLIC ACCOUNTANT
4000 WESTERLY PLACE SUITE 215
NEWPORT BEACH, CA 92660
[redacted]

DATE	INVOICE	AMOUNT

CAFCO2 David Stein
5145

PAY One Hundred and 00/100 DOLLARS

HRS	DATE	TO THE ORDER OF	GROSS	DESCRIPTION	DISC	NET AMT
	3/1/84	Americans With Hart				100.00

J. G. Belden

[redacted]

CAFCOZ David Stein

GLORIA F. ZIGNER

[redacted]

No. 673

March 1, 19 84 90-3851/1222

$ 1,000.00

MARINE NATIONAL BANK

[redacted]

CAFCOZ David Stein

199

ERIC ADAMS

[redacted]

22231 WOOD ISLAND LANE
HUNTINGTON BEACH, CA 92646

March 1 1984 90-7141/3222

ERICANS With Hart $ 100.00

One hundred and No/100 Dollars

[redacted] Savings and Loan Association

[redacted] Beach, CA 92646

[redacted] CONTRIBUTION

[redacted]

930435324779

CAFCOZ David Stein

1102

DARYL HEINLY & COMPANY

[redacted]

Mar 1 84 16-2607/1222

PAY TO THE ORDER OF [redacted] $ 100.00

[redacted]

[redacted]

CAFCOZ 2095

JOSEPH WM. SMITH

First Interstate

[redacted]

CAFCOZ 15-24/982
David Stein 1220(7)

SIMON J. WHITMEY
ROXANNE F. HOUGH WHITMEY
23882 DANZIG BAY [redacted]
LAGUNA NIGUEL, CA 92677

3226

Mar 1st 19 84

Pay to the order of Americans with Hart $ 2000 xx/100

Two thousand xx/00 _____ Dollars

Wells Fargo Bank, NA
LAGUNA NIGUEL OFFICE
30180 TOWN CENTER DR. LAGUNA NIGUEL, [redacted]

[redacted]

CAFCOZ David Stein
459

BARRY BRIEF

[redacted]

30-3796
1222

PAY TO THE ORDER OF $1,000.00

DOLLARS

M.M. MARSHALL BANK, N.A.

[redacted]

9304355324800

MARY ANN [redacted] SMITH
31344 W. NINE DR.
LAGUNA NIGUEL, CA 92677

1121

March 1 1984 16-4/1220

PAY TO THE ORDER OF Americans with Hart $ 25.00

Twenty-five and 00/100 DOLLARS

SECURITY PACIFIC NATIONAL BANK
Laguna Niguel Office #0274
30202 Crown Valley Pkwy.
Laguna Niguel, CA 92677

MEMO Hart campaign 1984 Mary Ann Smith

[redacted]

JO ANNA LLOYD
40 BROOKMONT [redacted]
IRVINE, CA 92714

CAFCOZ David Stein
966

Mar 2 1984 90-3152 / 1222

PAY TO THE ORDER OF Hart for President $ 250.00

Two hundred fifty and 00/100 DOLLARS

ELDORADO BANK
17752 SEVENTEENTH STREET
TUSTIN, CALIFORNIA 92680

FOR [redacted]

C. K. KNICKERBOCKER
4001 BIRCH STREET, SUITE A
NEWPORT BEACH, CA 92660

CAFCOZ David Stein
830

3-1 1984 90-3848 / 1222

PAY TO THE ORDER OF Americans With Hart $ 2000 00

Two Thousand and no/100 DOLLARS

PACIFIC NATIONAL BANK
4665 MACARTHUR COURT
NEWPORT BEACH, CALIFORNIA 92660

FOR [redacted]

LELAINE M. BUSHEY
[redacted]
127-A LISA LANE
COSTA MESA, CA 92627

CAFCOZ David Stein
125

March 2 1984 16-66/1220

Pay to the order of Gary Hart $ 1,000.00

One thousand only Dollars

BANK OF AMERICA
WESTCLIFF PLAZA BRANCH 0987
1018 IRVINE AVENUE
P.O. BOX 1697
NEWPORT BEACH, CA 92660

Memo ID C00159231 Lelaine M. Bushey

[redacted]

[redacted] T THOMSEN
3 CASCADE [redacted]
IRVINE, CA 92714

3/2 19 84 30-3848 1222

Pay to the Order of Americans with Hart $ 250.00

Two hundred fifty & 00/100 XX Dollars

PACIFIC NATIONAL BANK

For [redacted] Bart Thomsen

CAFCO2 David Stein

HOWARD BRIEF
ATTORNEY AT LAW
222 MAIN ST. [redacted]
SEAL BEACH, CA 90740

1081

3-2 19 84 16-66/1220

Pay to the Order of Americans For Hart $ 1,000 -

One thousand Dollars Dollars

BANK OF AMERICA
SEAL BEACH BRANCH 0132
208 MAIN STREET
P.O. BOX 100
SEAL BEACH, CA 90740

GENERAL ACCOUNT

For [redacted]

930435323 2 4 8 2

J. PAUL BOWINKEL
[redacted]
33894 CAPE COVE
LAGUNA NIGUEL, CA 92677

CAFCO2 David Stein
775

March 1 19 84 16-24/643 1220(7)

PAY TO THE ORDER OF AMERICAN with HART $ 150.00

One hundred fifty no/00 DOLLARS

NEWPORT FINANCIAL CENTER OFFICE
Wells Fargo Bank
660 NEWPORT CTR. DR., NEWPORT BEACH, CA 92660

FOR [redacted]

LILYAN BRIEF 1-81
JERRY J. BRIEF
8815-1104C YUBA CIRCLE
HUNTINGTON BEACH, CA 92646

CAFCO2 David Stein 935

March 2 19 84 30-7035/3222

PAY TO THE ORDER OF AMERICANS WITH HART $ 2.00

Two THOUSAND DOLLARS

DOWNEY SAVINGS AND LOAN ASSOCIATION
HUNTINGTON BEACH OFFICE
20002 BROOKHURST STREET
HUNTINGTON BEACH, CALIFORNIA 92646

[redacted]

EDWARD D. LOHRBACH
31866 CAMINO CAPISTRANO [redacted]
SAN JUAN CAPISTRANO, CA 92675

CAFCO2 David Stein 1068

Mar 2 19 84

16-21/233
1220

PAY TO THE ORDER OF Americans With Hart $ 500.00

Five hundred dollars and 00/100---------- DOLLARS

First Interstate Bank

First Interstate Bank
of California
Orange County Airport Office
4667 MacArthur Boulevard
Newport Beach, CA 92660

FOR [redacted]

Edward D. Lohrbach

FROM THE ACCOUNT OF

PAUL W. PFEIFFER CAFCO2
500 CAGNEY LN., #205 [redacted] David Stein
NEWPORT BEACH, CA 92663

16-24/643
1220(7)

920

3-1 1984

PAY TO THE ORDER OF Americans For Hart $ 100 00

One Hundred and 00/100 DOLLARS

NEWPORT FINANCIAL CENTER OFFICE
660 NEWPORT CT[redacted] BEACH, CA 92660

WELLS FARGO BANK
NATIONAL ASSOCIATION

Paul W. Pfeiffer

[redacted]

2304353248833

STANLEY A. SOLOMON
FRANCINE M. SOLOMON
16 MORRO BAY DRIVE
CORONA DEL MAR, CALIFORNIA 92625

CAFCOZ David Stein 3172

March 19 84 18-77/1220

Pay to the Order of Gary Hart For President

One Hundred $ 100.00

Dollars

South Orange County Regional Office
Union Bank
610 Newport Center Drive, Newport Beach, Calif. 92660

Stanley A. Solomon

930435324884

FROM THE ACCOUNT OF

JACK H. OLDHAM
CHERYL A. OLDHAM
4355 WINTERSWEET WAY
IRVINE, CA 92715

CAFCOZ David Stein

16-24/643
1220(7)

March 1 19 84 2087

PAY TO THE ORDER OF Americans for Hart

One Hundred $ 100.00

DOLLARS

NEWPORT FINANCIAL CENTER OFFICE
660 NEWPORT CTR DR, NEWPORT BEACH, CA 92660
WELLS FARGO BANK
NATIONAL ASSOCIATION

David 1715
Stein

March 1 1984

Pay to the order of Americans with Hart $100 00/100

One hundred ——— Dollars

PETER T. CAPOBIANCO
TAMARA S. CAPOBIANCO
27111 PINARIO
MISSION VIEJO, CA 92692

[redacted]

[redacted]

Hutton

CAFCO2 David Stein
308

GARY T WESCOMBE
PATRICIA J WESCOMBE
13151 COTTONWOOD DR
SANTA ANA CA 92705

March 1, 1984 3-5/310

PAY TO THE ORDER OF Americans for Hart $ 100.00

One Hundred and 00/100 ——— DOLLARS

PROVIDENT NATIONAL BANK
17th & CHESTNUT STREETS
PHILADELPHIA, PA 19101

Asset Management Account

[redacted]

930435324835

Memo:

ALFRED J. WANAMAKER CAFCO2 David Stein
660 NEWPORT CENTER DR., STE. 850
NEWPORT BEACH, CA 92660

16-24/643
1220(7)

440

March 1 1984

Pay to THE ORDER OF Americans With Hart $100 00

One hundred ——— Dollars

Wells Fargo Bank N.A.
NEWPORT FINANCIAL CENTER OFFICE
660 NEWPORT CTR. DR., NEWPORT BEACH, CA 92660

[redacted]

CAFCO2 David Stein 2818

MICHAEL L. MEYER
660 NEWPORT CTR. DR., STE. 850
NEWPORT BEACH, CA 92660

[redacted]

March 4 19 84

16-24/643
1220(7)

PAY TO THE ORDER OF Americans with Hart $ 100.00

One hundred and 00/100 ——— DOLLARS

NEWPORT CENTER OFFICE
WELLS FARGO BANK
NATIONAL ASSOCIATION
660 NEWPORT CENTER DRIVE
NEWPORT BEACH, CALIFORNIA 92660

[redacted]

GEOFFREY CAHOON
CDL N730635 [redacted]
31555 FIRST STREET
SOUTH LAGUNA, CA 92677

400

3/2 19 84

90-3848
1222

Pay to the Order of Americans With Heart $ 500.00

Five Hundred and no/100 Dollars

PACIFIC NATIONAL BANK
4665 MACARTHUR COURT
NEWPORT BEACH, CALIFORNIA 92660

For ID# C00159251 Geoffrey Cahoon

[redacted]

RICHARD L. PETERSON
WINNIFRED E. PETERSON
31674 WEST NINE DR. [redacted]
LAGUNA NIGUEL, CA 92677

CAFCOZ David Stein 965

March 2 19 84

90-3796
1222

Pay to the Order of Americans With Heart $ 100 00

One Hundred and no/100 Dollars

MONARCH BANK
30000 Town Center Drive
Laguna Niguel, California 92677

Winnifred E Peterson

For [redacted]

©HARLAND 1980 MET 9

ROSS L. STEIN [redacted]
2135 CATALINA ST.
LAGUNA BEACH, CA 92651

3.1 19 84 2082
CAFCOZ David Stein

16-66/1220

Pay to the order of American with Heart $ 1000 —

one Thousand and no/100 Dollars

BANK OF AMERICA
LAGUNA BEACH BRANCH 0097
299 OCEAN AVENUE
P. O. BOX 857
LAGUNA BEACH CA 92653

Memo Donation

Ross Stein

[redacted]

KENNETH GOLDMAN
LORI GOLDMAN [redacted]
208 MC CARTY DRIVE
BEVERLY HILLS, CALIF 90212

CAFCOZ David Stein 4650

March 2 19 84

16-1606/1220

PAY TO THE ORDER OF Americans With Heart $ 500 00

Five hundred DOLLARS

HEAD OFFICE
CITY NATIONAL BANK
400 NO. ROXBURY DRIVE
BEVERLY HILLS, CALIFORNIA 90210

MEMO

[redacted]

9 3 0 4 3 5 3 2 4 8 6

KURT E. HAUNFELNER
1775 W. CASTLE AVE
ANAHEIM, CA 92804

CAFCO2 David Stein

March 2 19 84 16-7001/3220

PAY TO THE ORDER OF Americans With Hart $ 100.00

One-Hundred and 00/100 DOLLARS

CALIFORNIA FEDERAL
SAVINGS AND LOAN ASSOCIATION
500 North Euclid
Anaheim, California 92801

MEMO

[redacted]

ROBERT UNETIC
283 SENTOUS [redacted]
WEST COVINA, CA 91792

CAFCO2 David Stein
1446

March 1 19 84 16-4/1220

PAY TO THE ORDER OF Americans With Hart $ 35.00

Thirty-five and 00/100 DOLLARS

SECURITY PACIFIC NATIONAL BANK
Santa Ana Main Office #0023
890 North Main Street
Santa Ana, CA 92701

MEMO

[redacted]

JOHN R. HANNA
3882 HENDRIX ST [redacted]
IRVINE, CA 92714

CAFCO2 David Stein
2763

3/1 1084 75-532/919

Pay to the Order of Americans with Heart $ 100.00

One Hundred and NO/100's Dollars

ORANGE COUNTY POSTAL/FEDERAL
EMPLOYEES CREDIT UNION
13902 Harbor Boulevard
Garden Grove, California 92643
Payable Through First Bank (N.A.) St. Cloud, MN

FOR [redacted]

930435324887

[redacted]
826 N. BROADWAY
SANTA ANA, CA 92701

[redacted]
1345 CABRILLO MC 08
SANTA ANA
S/E

0748

ONE HUNDRED TWENTY FIVE _____ DOLLARS

RS	DATE	TO THE ORDER OF		GROSS	DESCRIPTION	DISC	CHECK AMOUNT
	3/2/84	AMERICANS WITH HART			FICA FED WITH SWT SDI		125 —

LLOYDS BANK CALIFORNIA SANTA ANA CORPORATE OFFICE
1622 NORTH MAIN ST., SANTA ANA, CALIFORNIA 92701

[redacted]

[redacted]

BEVERLY HILLS SAVINGS
AND LOAN ASSOCIATION

CAFCOZ Davidstein
09- 872230368 5
87EE303685 009 04

DATE MARCH-84

[redacted]

**********$100 AND 00/100 DOLLARS **********100.00
ONE HUNDRED AND 00/100 DOLLARS

DRAWER BEVERLY HILLS SAVINGS AND LOAN ASSOCIATION

PAY TO THE ORDER OF ***AMERICANS WITH HART ***

RE: JOAN WESTBERG

AUTHORIZED SIGNATURE

TWO SIGNATURES REQUIRED OVER $

[redacted]

930435324888

Harvey A. or Sandy G. Englander
2721 Vista Knoll Rd. [redacted]
Nohl Ranch, Ca 92667

4633

2 March 84

16-2507/1222

Pay To The Order Of Hart for President $ 1250 —

One Thousand two hundred fifty — Dollars

MITSUI MANUFACTURERS BANK
ONE NEWPORT PLACE
1301 DOVE STREET
NEWPORT BEACH, CALIFORNIA 92660

Memo

Harvey A. Englander

[redacted]

[redacted] [redacted]

AIRTIME RESEARCH ASSOCIATES

1159

Mar. 1 19 84

90-2887/1
1222

PAY TO THE ORDER OF Hart for President $ 250.00

Two Hundred Fifty & 00/100 DOLLARS

Westlands Bank
ORANGE COUNTY REGIONAL OFFICE
2900 S. HARBOR BLVD. SANTA ANA, CA 92704

MEMO donation

Joe B. Wachsberger

[redacted]

LEE R. HARRINGTON
330 E. BISHOP [redacted]
SANTA ANA, CA 92701

1372

March 2 19 84

16-351/15
1220

PAY TO THE ORDER OF Hart for President $ 250.00

Two hundred fifty and no/100 DOLLARS

Lloyds Bank California
TUSTIN OFFICE
701 E. FIRST STREET
TUSTIN, CA 92680

MEMO

Lee R. Harrington

[redacted]

930435324889

CAP 002 Part 1 210

BERNARD W. FELDMAN
NINA W. FELDMAN
17811 CARRANZA LN. [redacted]
HUNTINGTON BEACH, CA 92647

No. 390

Mar 2 19 84

16-2887/1222

Pay to the order of Hart for President $ 250.00

Two hundred & fifty 00/100 DOLLARS

MITSUI MANUFACTURERS BANK
ONE NEWPORT PLACE
1301 DOVE STREET
NEWPORT BEACH, CALIFORNIA 92660

MEMO

Bernard W. Feldman

[redacted]

[redacted] DeLIEMA
KATHY L. DeLIEMA
26245 BUSCADOR
MISSION VIEJO, CA 92692

146

3-2 1984 16-2607/1222

PAY TO THE ORDER OF Hart For President $ 250.00

Two hundred fifty and no/100 DOLLARS

MITSUI MANUFACTURERS BANK
ONE NEWPORT PLACE
1301 DOVE STREET
NEWPORT BEACH, CALIFORNIA 92660

MEMO

[redacted] Robert DeLiema

[redacted] 20 153

ADMAIL - PACIFIC
~~10541 GOTHARD ST., NO. 204~~ 16582 BURKE LANE
HUNTINGTON BEACH, CA 92647 [redacted]

284

Mar 2 1984 90-2881/1222

PAY TO THE ORDER OF Hart for President $ 500.00

Five Hundred and 00/100 DOLLARS

FOUNTAIN VALLEY OFFICE
HOME BANK
17010 MAGNOLIA AVENUE, FOUNTAIN VALLEY, CALIFORNIA 92708

FOR [redacted] James G. Geary

[redacted]

[redacted]

[redacted]

Hart for President

Two hundred fifty and 00/100 DOLLARS $ 250.00

3-1 1984 90-3966/1222

MICHAEL R. WEINBERG, C.P.A.
12304 SANTA MONICA BLVD., STE. 116
LOS ANGELES, CA 90025 [redacted]

779

Corporate National Bank
2161 N. GRAND AVE. SANTA ANA, CALIF. 92705

[redacted] JUAN AVILA
ELIDA AVILA
29772 ELLENDALE [redacted]
LAGUNA NIGUEL, CA 92677

3-2-1984

16-21/221
1220

PAY TO THE ORDER OF AMERICANS WITH HART $100 00
One Hundred dollar and no/100 DOLLARS

First Interstate
Bank

First Interstate Bank
of California
Laguna Niguel Office
Six Monarch Bay Plaza
Laguna Niguel, CA 92677

[redacted]

DAVIDSTEIN ~~Julie Sandler~~ - CAFCO2

Julie Sandler
MONARCH BANK
30000 TOWN CENTER DRIVE
LAGUNA NIGUEL, CALIFORNIA 92677

№ 26407

MARCH 2 19 84

90-3796
1222

Pay to the order of ******AMERICANS WITH HART ********** $ ***500.00****

[redacted] Dollars

CASHIER'S CHECK

Mary Cannington
AUTHORIZED SIGNATURE

[redacted]

CAFCO2 DavidStein
895

R. C. ARMSTRONG
BUSINESS ACCOUNT
[redacted]

March 2 19 84

90-7036
3222

PAY TO THE ORDER OF Americans with Hart $ 100.00

One Hundred & 00/100 DOLLARS

FIDELITY FEDERAL
SAVINGS AND LOAN ASSOCIATION

310 GLENNEYRE STREET, LAGUNA BEACH, CA 92651

FOR [redacted]

[redacted]

930435324971

9304353224922

March 1, 1984

Mr. Doug Rosen
Americans With Hart
507 8th Street, S.E.
Washington D.C. 20003

Dear Doug:

On behalf of Mr. David Stein, enclosed please find photo copies of checks totaling $9,500 payable to "Americans" With Hart" that were sent to your Denver office.

These checks were mailed via Federal Express at 6:00 p.m. on Thursday, March 1 and should be received in Denver on Friday, March 2.

Yours truly,

Chris Townsend

Chris Townsend
Executive Assistant

CT:nss

Enclosures

29982 Ivy Glenn, Suite One Hundred • Laguna Niguel, CA 92677 • (714) 859-6995

JAMES D. STOUT
17992 COWAN [redacted]
IRVINE, CA 92714

CAFCOZ ~~David Stein~~

1251

3-1 19 84 90-3848 1222

PAY TO THE ORDER OF Americans for Hart $ 2,000.00

Two Thousand and no/100---------- DOLLARS

PACIFIC NATIONAL BANK
4665 MACARTHUR COURT
NEWPORT BEACH, CALIFORNIA 92660

FOR [redacted] Howard J. Lauer

JOSIAH G. BELDEN
CERTIFIED PUBLIC ACCOUNTANT
4000 WESTERLY PLACE SUITE 210
NEWPORT BEACH, CA 92660
[redacted]

DATE	INVOICE	AMOUNT

CAFCOZ David Stein
90-3848
1222

5145

PAY One Hundred and 00/100 DOLLARS

HRS	DATE	TO THE ORDER OF	GROSS	DESCRIPTION	DISC	CHECK AMOUNT
	3/1/84	Americans With Hart				100.00
				FICA FED WITH SWT SDI		

FIRST AMERICAN BANK & TRUST CO. NA
[illegible] BROADWAY, LAGUNA BEACH, CA 92651

[redacted] Josiah Belden

CAFCOZ David Stein

GLORIA E. ZIGNER
[redacted]
328 N. NEWPORT BLVD.
NEWPORT BEACH, CA 92663

673

March 1, 84

90-3851/1222

Pay to the order of Americans with Hart

$ 1,000.00

One thousand dollars and no/100* * * * * * * * * * * Dollars

MARINE NATIONAL BANK
3310 NO. HARBOR BLVD. • SANTA ANA, CA 92704

[redacted]

CAFCOZ David Stein

199

ERIC ADAMS
[redacted]
22231 WOOD ISLAND LANE
TINGTON BEACH, CA 92646

March 1 1984

90-7141
3222

ERICANS With HART $ 100.00

Hundred and no/100 Dollars

and Loan

BOTTOM

930435324924

CAFCOZ David Stein

1102

DARYL HEINLY & COMPANY
3151 AIRWAY AVE., BLDG. F-206
COSTA MESA, CA 92626

Mar 1 1984

16-2607
1222

PAY TO THE ORDER OF Americans for Hart

$ 100.00

One hundred + no/100 DOLLARS

MITSUI MANUFACTURERS BANK
ONE NEWPORT PLACE
1301 DOVE STREET
NEWPORT BEACH, CALIFORNIA 92660

[redacted]

CAFCOZ 2095

JOSEPH WM. SMITH
33671 SHACKLETON ISLE
LAGUNA NIGUEL, CA 92677

16-21/221
1220

Americans with Hart
Two Thousand and 00/100

First Interstate Bank

First Interstate Bank
of California
Laguna Niguel Office
Six Monarch Bay Plaza
Laguna Niguel, CA 92677

[redacted]

930435324955

SIMON J. WHITMEY
ROXANNE F. HOUGH WHITMEY
23882 DANZIG BAY [redacted]
LAGUNA NIGUEL, CA 92677

CAFCOZ 16-24/982
David Stein 1220(7)

3226

Mar 1st 19 84

Pay to THE ORDER OF Americans with Hart $ 2000 xx/100

Two thousand xx/100 Dollars

Wells Fargo Bank N.A.
LAGUNA NIGUEL OFFICE
30160 TOWN CENTER DR., LAGUNA NIGUEL, CA 92677

[redacted]

CAFCOZ David Stein
459

BARRY BRIEF
31821 SO. COAST HWY.
SOUTH LAGUNA, CA 92677

2-29 19 84

90-3796
1222

PAY TO THE ORDER OF Americans With Hart $ 1,000 00

One Thousand & no/xx DOLLARS

MONARCH BANK
[redacted] Town Center Drive
Laguna Niguel, California [redacted]

FOR

[redacted]

JAMES W SMITH
KATHLEEN C SMITH
33391 COCKLESHELL DR [redacted]
LAGUNA NIGUEL, CA 92677

CAFCO2 David Stein
1552

90-3848/1222

19

PAY TO THE ORDER OF

$

DOLLARS

PACIFIC NATIONAL BANK
4665 MACARTHUR COURT
NEWPORT BEACH, CALIFORNIA 92660

FOR

[redacted]

David Stein
CAFCO2 355

SHARON IKEMOTO
31842 IVY LANE [redacted]
SOUTH LAGUNA, CA 92677

31 84

90-3293
1222

PAY TO THE ORDER OF Americans for Hart $ 100.00

One Hundred Dollars DOLLARS

Newport Center Office
100 Newport Center Drive
Newport Beach, Ca. 92660

AMERICAN STATE BANK

FOR Sharon Ikemoto

[redacted]

David Stein
CAFCO2
1866

D. M. WAITE
[redacted]
2680 SANTA ANA, NO. E
COSTA MESA, CA 92627

19 84

16-4/1220

PAY TO THE ORDER OF Committee with Hart $ 100.00

One Hundred + 00/100 DOLLARS

SECURITY PACIFIC NATIONAL BANK
Irvine Office
18622 MacArthur Blvd., Irvine, CA 92715

[redacted]

9300435324996

STEIN BRIEF GROUP

March 1, 1984

Mr. Doug Rosen
Americans With Hart
507 8th Street, S.E.
Washington, D.C. 20003

Dear Doug:

On behalf of Mr. David Stein, enclosed please find photo copies of checks totaling $5,990 payable to "Americans With Hart" that were sent to your Denver office.

These checks were mailed via Federal Express at 6:00 p.m. on Wednesday, February 29 and should be received in Denver on Thursday, March 1.

Yours truly,

Chris Townsend

Chris Townsend
Executive Assistant

CT/dw

29982 Ivy Glenn, Suite One Hundred • Laguna Niguel, CA 92677 • (714) 859-6995

RICHARD W. SCHMIDT
[redacted]
34114 SELVA RD., NO. 320
LAGUNA NIGUEL, CA 92677

418

19

Pay to the Order of [illegible] WITH HART $

ONE THOUSAND & NO/100 Dollars

PACIFIC NATIONAL BANK
[illegible] MACARTHUR COURT
NEWPORT BEACH, CALIFORNIA 92660

ID# C0015925 1

For [illegible] CONTRIBUTION

Richard W Schmidt

[redacted]

DAVID STEIN

CHRIS TOWNSEND
29642 CORAL COVE [redacted]
LAGUNA NIGUEL, CA 92677

183

Feb 29 19 84

16-4/1220

PAY TO THE ORDER OF American With Heart $ 890.00

Eight hundred and ninety and NO/100 DOLLARS

SECURITY PACIFIC NATIONAL BANK
Laguna Niguel Office #0274
30202 Crown Valley Parkway, Laguna Niguel, CA 92677

FOR ID# C 0015925 1

Chris Townsend

[redacted]

930435324998

DAVID STEIN

PHYLLIS M. SNYDER
ATTORNEY AT LAW
2282 GLENNEYRE [redacted]
LAGUNA BEACH, CA 92651 •

1611

Feb. 29, 1984 90-7032/3222

PAY TO THE ORDER OF Americans With Hart $ 100 no/xx

— one Hundred ——— no/xx DOLLARS

Santa Barbara Savings
AND LOAN ASSOCIATION
30804 PACIFIC COAST HIGHWAY
SOUTH LAGUNA, CA 92677

MEMO ID# C0015925 Phyllis M. Snyder

[redacted]

930435324999

DAVID STEIN

JUDITH WYATT
29982 IVY GLENN [redacted]
LAGUNA NIGUEL, CA 92677

214

2-24 1984 90-3796 1222

PAY TO THE ORDER OF Americans With Hart $ 2,000.00

Two Thousand 00/100 DOLLARS

MONARCH BANK
30000 Town Center Drive
Laguna Niguel, California 92677

NEW OUTLOOKS CLUB

FOR [redacted] ID# C0015925 Judith Wyatt

[redacted]

DAVID STEIN

NATE STEIN •

108

FEB 28 1984 90-3796 1222

Pay To The Order Of AMERICANS WITH HART $ 2000.00

Two thousand [redacted] Dollars

MONARCH BANK
30000 Town Center Drive
Laguna Niguel, California 92677

For NATE + NEIL STEIN

[redacted]

ID# C0015925

December 5, 1985

STEIN-BRIEF GROUP

Mr. Richard Wagner
AMERICANS WITH HART
122 "C" St., N.W., Ste. 360
Washington, D.C. 20001

Dear Richard:

On behalf of David Stein, enclosed please find the following checks made payable to "Americans With Hart" and "Hart for Senate":

Americans With Hart

Thomas S. Byrnes	$1,000
James McDermott	$1,000
Morry Waksberg	$1,000

Hart for Senate

Tom Hayden	$2,000
Jane Fonda	$2,000
Total	$7,000

These checks complete David's pledge for the Harriman Dinner. Please contact me if you have any questions or need additional information.

Yours truly,

Chris Townsend
Director of Public Affairs

CT:l
cc: Bill Dixon
Enclosures

9304335325500

VENDOR INFORMATION
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW (IF NOT CORRECT, E.&O.E.)

INV DATE	INV#	DESCRIPTION	PAYMENT	DISC	DISTRIBUTION
11-19-85	4643		1,000.00		

EMPLOYEE

TOTAL EARNINGS	FED INC TAX	F I C A	STATE INC TAX	S D			NET PAY

CONTROL NO 303784 DETACH AND RETAIN THIS STATEMENT

TOM HAYDEN
C/O BRESLAUER, JACOBSON & RUTMAN
0880 WILSHIRE BLVD. SUITE 2110
OS ANGELES, CA. 90024 213-470-1266

DATE 11-19-85 CHECK NO 1959

90-3070/1222
THE BANK OF CALIFORNIA
BEVERLY HILLS OFFICE
9401 WILSHIRE BLVD
BEVERLY HILLS, CA. 90212

NE THOUSAND DOLLARS EXACTLY

***$1,000.00

PAY TO THE ORDER OF HART FOR SENATE (PRIMARY ELECTION)

22230703 075-405143

[redacted]

[redacted]

9304353250 1

VENDOR INFORMATION
THE ATTACHED CHECK IS IN PAYMENT OF AS DESCRIBED BELOW (IF NOT CORRECT PLE-

FOR INTERNAL USE ONLY
IF YOU HAVE QUESTIONS PLEASE CALL

INV DATE	INV#	DESCRIPTION	PAYMENT	CODE	DISTRIBUTION
11-19-85	4642		1,000.00	7125-002	1,000.00

EMPLOYEE

TOTAL EARNINGS	FED INC TAX	F I C A	STATE INC TAX	S.D.			NET PAY

CONTROL NO 303783 DETACH AND RETAIN THIS STATEMENT

TOM HAYDEN
C/O BRESLAUER, JACOBSON & RUTMAN
0880 WILSHIRE BLVD. SUITE 2110
OS ANGELES, CA. 90024 213-470-1266

DATE 11-19-85 CHECK NO 1958

90-3070/1222
THE BANK OF CALIFORNIA
BEVERLY HILLS OFFICE
9401 WILSHIRE BLVD.
BEVERLY HILLS, CA. 90212

NE THOUSAND DOLLARS EXACTLY

***$1,000.00

PAY TO THE ORDER OF HART FOR SENATE (GENERAL ELECTION)

122230703 075-405143

[redacted]

[redacted]

9304353250 2

VENDOR INFORMATION
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW. IF NOT CORRECT PLEASE ADVISE IMMEDIATELY.

INV DATE	INV#	DESCRIPTION	PAYMENT
11-19-85	4652		1,000.00

FOR INTERNAL USE ONLY
IF PAYMENT IS NOT MADE AT THIS TIME

CODE	DISTRIBUTION
7125-001	1,000.00

EMPLOYEE

TOTAL EARNINGS	FED INC TAX	F I C A	STATE INC TAX	S D I			NET PAY

CONTROL NO 303807 DETACH AND RETAIN THIS STATEMENT

ANE FONDA
C/O BRESLAUER, JACOBSON & RUTMAN
0880 WILSHIRE BLVD. SUITE 2110
OS ANGELES, CA. 90024 213-470-1266

DATE 11-19-85 CHECK NO 3636

90-3070/1222
THE BANK OF CALIFORNIA
BEVERLY HILLS OFFICE
9401 WILSHIRE BLVD.
BEVERLY HILLS, CA. 90212

NE THOUSAND DOLLARS EXACTLY

PAY TO THE ORDER OF HART FOR SENATE
(PRIMARY ELECTION)

***$1,000.00

122230703 075-405015

[redacted]

[redacted]

23043553253 03

VENDOR INFORMATION
THE ATTACHED CHECK IS IN PAYMENT OF | DESCRIBED BELOW. IF NOT CORRECT PLEA... | FOR INTERNAL USE ONLY

INV DATE	INV#	DESCRIPTION	PAYMENT	CODE	DISTRIBUTION
11-19-85	4651		1,000.00	7125-001	1,000.00

EMPLOYEE

TOTAL EARNINGS	FED INC TAX	F.I.C.A.	STATE INC TAX	S.D.I.			NET PAY

CONTROL NO 303806 DETACH AND RETAIN THIS STATEMENT

JANE FONDA
C/O BRESLAUER, JACOBSON & RUTMAN
10880 WILSHIRE BLVD. SUITE 2110
LOS ANGELES, CA. 90024 213-470-1266

DATE 11-19-85 CHECK NO 3635

90-3070/1222
THE BANK OF CALIFORNIA
BEVERLY HILLS OFFICE
9401 WILSHIRE BLVD.
BEVERLY HILLS, CA. 90212

NE THOUSAND DOLLARS EXACTLY

PAY TO THE ORDER OF HART FOR SENATE (GENERAL ELECTION)

***$1,000.00

122230703 075-405015

[redacted]

[redacted]

930435325504

[redacted] 124

Pay To The Order Of Americans with Heart $ 1,000 00

ONE THOUSAND ** Dollars

First Los Angeles Bank

Memo Contribution [redacted]

JAMES A. McDERMOTT, JR. 2052

1217 HUGHLE AVE., NO. 14
LOS ANGELES, CA 90026

Nov. 25 19 82

Pay To The Order Of Hart for President Committee $ 1000.00

One thousand dollars

Bank of Los Angeles

Memo [redacted]

MORRY WAKSBERG, M.D.
DIPLOMATE AMERICAN BOARD OF [redacted]
9735 WILSHIRE BLVD. SUITE 240
BEVERLY HILLS, CALIFORNIA 90212

EXPLANATION

1566

PAY ONE THOUSAND AND NO/100 DOLLARS

DATE	TO THE ORDER OF		CHECK NO	NET AMOUNT
10/11/82	AMERICANS WITH HEART c/o DAVID STEIN [redacted] LAGUNA NIGUEL CA 92677	DONATION DESCRIPTION	1566	1,000 00

MITSUI MANUFACTURERS BANK Beverly Hills Office
9701 WILSHIRE BOULEVARD BEVERLY HILLS, CALIFORNIA 90212

[redacted]

2304355325505

P-5[redacted]927 030

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED

NOT FOR INTERNATIONAL MAIL

Ms. Charlotte Conway
CONWAY/LEVY & ASSOCIATES
9935 Santa Monica Blvd.
Beverly Hills, CA 90212

Postage	.22
Certified Fee	.70
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	.75
TOTAL Postage and Fees	1.67
Postmark or Date	

PS Form 3800, June 1985

[redacted]

[redacted]

930435325006

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fee and check box(es) for additional service(s) requested.

1. ☐ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery

3. Article Addressed to:

Ms. Charlotte Conway
CONWAY/LEVY & ASSOCIATES
9935 Santa Monica Blvd.
Beverly Hills, CA 90212

Article Number
P-505 927 036

Type of Service:
☐ Registered ☐ Insured
☐ Certified ☐ COD
☐ Express Mail

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature – Addressee
X Liza Gallan

8. Addressee's Address (ONLY if requested and fee paid)

6. Signature – Agent
X

7. Date of Delivery

PS Form 3811, Feb. 1986 DOMESTIC RETURN RECEIPT

9304353253507

GWH - NFC File

STEIN-BRIEF GROUP

April 23, 1987

Ms. Charlotte Conway
CONWAY/LEVY & ASSOCIATES
9935 Santa Monica Blvd.
Beverly Hills, CA 90212

Dear Charlotte:

On behalf of David Stein, enclosed please find the following checks made payable to Americans With Hart for the Marvin Davis Reception on April 15:

Richard Mahdesian	$1,000
Gloria Mahdesian	1,000
Michael Mahdesian	1,000
Natalie Mahdesian	1,000
TOTAL:	$4,000

We are proud and honored to support your great efforts on behalf of Gary Hart.

Yours truly,

Christopher Townsend
Director of Public Affairs

CT/jes
Enclosures (4)

29082 Ivy Glenn
Laguna Niguel, CA 92677
714-359-6995

9304355325508

GLORIA OR RICH[redacted] MAHDESIAN
13075 BLAIRWOOD DR.
STUDIO CITY, CA 91604

107

4/17 19 87

90-7011/3222

PAY TO THE ORDER OF American With HART $ 1000 00

One Thousand and no/100 DOLLARS

SHERMAN OAKS BRANCH
LINCOLN SAVINGS
13701 Riverside Drive / Sherman Oaks, CA 91403

MEMO FCCA 12 (mm) Richard Mahdesian

[redacted]

GLORIA OR RICHARD MAHDESIAN
[redacted]
13075 BLAIRWOOD DR.
STUDIO CITY, CA 91604

106

4/17 19 87

90-7011/3222

PAY TO THE ORDER OF American with HART $ 1,000 00

One Thousand and no/100 DOLLARS

SHERMAN OAKS BRANCH
LINCOLN SAVINGS
13701 Riverside Drive / Sherman Oaks, CA 91403

MEMO FCCA 12 (mm) Gloria Mahdesian

[redacted]

NATALIE M. MAHDESIAN
MICHAEL N. MAHDESIAN
[redacted]
8636 WONDERLAND AVE.
LOS ANGELES, CA 90046

2149

4-15 19 87

164/1220

PAY TO THE ORDER OF American's Wife HART $ 1000 00/100

One thousand and no/100 DOLLARS

SECURITY PACIFIC NATIONAL BANK
Studio City Office #0074
12155 Ventura Blvd., Studio City, CA 91604

FOR FCCA 12 (mm) Michael Mahdesian

[redacted]

ECONOMY SAFETYLINE © BANKPRINT 1982

NATALIE M. MAHDESIAN
MICHAEL N. MAHDESIAN
[redacted]
8636 WONDERLAND AVE.
LOS ANGELES, CA 90046

2148

4-15 19 87

164/1220

PAY TO THE ORDER OF American' Wife HART $ 1000 00/100

One thousand and no/100 DOLLARS

SECURITY PACIFIC NATIONAL BANK
Studio City Office #0074
12155 Ventura Blvd., Studio City, CA 91604

FOR FCCA 12 (mm) Natalie Mahdesian

[redacted]

ECONOMY SAFETYLINE © BANKPRINT 1982

930435325509

GWH (DS Finance Council)

STEIN-BRIEF GROUP

May 15, 1987

Ms. Patti Sampers
525 Milwaukee
Denver, CO 80206

Dear Patti:

On behalf of David Stein, enclosed please find checks from the Hollywood Palace Event made payable to Friends of Gary Hart totalling $260.00. I am sending them directly to you per our discussion in Denver last week.

Please give me a call if you have any questions or need additional information.

Yours truly,

Christopher Townsend
Director of Public Affairs

CT/jcs
Enclosures (5)

C0435325510

Allen Garfield
8033 Sunset Blvd., Suite 1103
Los Angeles, Ca 90046

4-15- 87 1075

16-24/863
1220(7)

Pay To The Order Of Friends of Gary Hart 1988 $ 50.00

FIFTY-DOLLARS Dollars

BEVERLY - FAIRFAX OFFICE
WELLS FARGO BANK
137 NORTH FAIRFAX AVENUE, LOS ANGELES, CA 90036

[redacted] Allen Garfield

FCCA12

JOSEPH WM. SMITH
33671 SHACKLETON ISLE
LAGUNA NIGUEL, CALIFORNIA 92677

3263

April 15, 1987

16-21/221
1220

Pay to the Order of Friends of Gary Hart $ 50 00

Fifty and 00/100 Dollars

First Interstate Bank
of California
Laguna Niguel Office
Six Monarch Bay Plaza
South Laguna, CA 92677

For FCCA12

[redacted] Joseph Wm. Smith

THOMAS A. PENDRY
124 N. FLORES
LOS ANGELES, CA 90048

375

4/20 19 87

16-21/1220

Pay to the order of Friends of Gary Hart '88 $ 100.00

One hundred and no/100 Dollars

First Interstate Bank
of California #154
5353 Wilshire Boulevard
P.O. Box 36936
Los Angeles, CA 90036

For FCCA12/TP

Thos A Pendry

[redacted]

Rocky Mountain Bank Note

NORM BALDWIN
[redacted]
575 S. BARRINGTON AVE., NO. 116
LOS ANGELES, CA 90049

0424
16 4/1220

April 15, 1987

PAY TO THE ORDER OF Friends of Gary Hart 1988 $ 35.00

Thirty-five 00/100 DOLLARS

SECURITY PACIFIC NATIONAL BANK
Long Beach Marina Office #0215
5430 E. Second St. Long Beach, CA 90803

FOR FEC A12 Campaign contribution Norm Baldwin

[redacted]

BANKPRINT

ROBERT K. STIENS
[redacted]
6000 GARDEN GROVE BLVD. #302
WESTMINSTER, CA 92683

4/15 1987 2446
16-21/1220

Pay to the Order of Friends of Gary Hart 1988 $ 25.00

Twenty Five 00/100 Dollars

First Interstate Bank
First Interstate Bank of California # 322
12518 Valley View Street
P.O. Box 5307
Garden Grove, CA 92645-0307

For FEC A12

[redacted]

[redacted] 0043532512

HOLD

STEIN-BRIEF GROUP

January 29, 1987

Mr. Richard Wagner
AMERICANS WITH HART
P. O. Box 75356
Washington, D.C. 20013

Dear Richard:

On behalf of David Stein, enclosed please find the following personal checks made payable to Friends of Gary Hart in conjunction with the January 29 dinner in Los Angeles:

David Stein	$250.00
Christopher Townsend	250.00
Camilla Kocol	250.00
Tom Pendry	250.00
Tom Kelley	250.00
	$1,250.00

Occupation and employer information have been written on the face of each check. Please contact me if you have any questions or need additional information.

Yours truly,

Christopher Townsend
Director of Public Affairs

CT/jes
Enclosures (5)

9304353253513

29982 Ivy Glenn
Laguna Niguel, CA 92677
714-859-6995

TVC

STEIN-BRIEF GROUP

March 20, 1987

Mr. Eli Segal
THE VOLUNTEER COMMITTEE
c/o Friends of Gary Hart
1600 Downing Street
Denver, CO 80218

Dear Eli:

On behalf of David Stein, enclosed please find a personal check from Barry Brief in the amount of $1,000.00 made payable to The Volunteer Committee

We are proud and honored to support your debt reduction efforts on behalf of the Committee.

Yours truly,

Christopher Townsend
Director of Public Affairs

CT/jes
Enclosure

9304353251 4

BARRY BRIEF
29982 IVY GLENN [redacted]
LAGUNA NIGUEL, CA 92677

3224

90-3848/1222

MARCH 20, 19 87

PAY TO THE ORDER OF THE VOLUNTEER COMMITTEE $ $1,000.00**

**ONE THOUSAND AND NO/100---------- DOLLARS

PACIFIC NATIONAL BANK
4665 MACARTHUR COURT
NEWPORT BEACH, CALIFORNIA 92660

FOR POLITICAL CONTRIBUTION

Judith Wyatt

[redacted]

Vender (Payee)

REQUEST FOR DISBURSEMENT

Request Date 3/17/87

№ 17337

The Volunteer Committee

Pay from Account: ~~BB~~ Personal

CO#	GL #	JOB #	COST CODE	LOT#	AMOUNT	COMMENTS
					$1,000.00	Political Contribution
						yes.
						per my discussion w/ BB
			CHECK AMOUNT		$1,000.00	

Check Disposition: Check - Jane

Check Requested By:

Approvals:

Marketing:_____ Operations:_____ G&A:_____

STB-103

Hart

STEIN-BRIEF GROUP

April 9, 1987

Mr. Westin Frank
FRIENDS OF GARY HART
1600 Downing Street
Denver, CO 80218

Dear Westin:

I recently had an opportunity to review your computer print out of contributors from California to the Friends of Gary Hart, Inc., (run dated March 5, 1987, 4:37 PM). I have noted the following discrepancies that I think should be clarified relative to credit to the National Finance Account for David Stein (Account Number FC CA 12):

- The report fails to include a $750.00 contribution that David Stein made to Friends of Gary Hart on December 15, 1986, that should be credited to his account FC CA 12. (A copy of the check contribution and cover letter is enclosed for your reference.)

- My personal $750.00 contribution to Friends of Gary Hart on December 18, 1986, has incorrectly been credited to Finance Account FCC09. It should be credited to the finance account of David Stein, FC CA 12.

- The $250.00 contribution from Mr. Michael Michaels dated February 18, 1987, for the Gersten event does not include our finance code FC CA 12.

I appreciate your consideration to clarify these records. Please feel free to contact me if you have any questions or need additional information.

Yours truly,

Christopher Townsend
Director of Public Affairs

CT/jes
Enclosures (2)

9304353251 6

Hart

STEIN BRIEF GROUP

December 12, 1986

Friends of Gary Hart
122 C St., NW - Suite 360
Washington, D.C. 20001

Attn: Richard Wagner

Dear Gary:

On behalf of David Stein, enclosed please find his personal check in the amount of $750.00 made payable to Friends of Gary Hart.

We are proud and honored to enjoy your friendship and support your presidential exploratory committee.

Yours truly,

Chris Townsend
Director of Public Affairs

CT/jes
Enclosure

29082 Ivy Glenn
Laguna Niguel, CA 92677
714-859-6005

9304353251 7

DAVID F. STE..

[redacted]
LAGUNA NIGUEL, CA 92677

2413

DECEMBER 15 19 86 90-3848 / 1222

PAY TO THE ORDER OF FRIENDS OF GARY HART $ $750.00**

**SEVEN HUNDRED FIFTY AND NO/100---------- DOLLARS

PACIFIC NATIONAL BANK
4665 MACARTHUR COURT
NEWPORT BEACH, CALIFORNIA 92660

Charter Shareholder's Account

FOR POLITICAL CONTRIBUTION [redacted]

930435325518

EMPLOYEE CONTRIBUTIONS TO GARY HART

Stein-Brief Group, Inc.

David Stein		$ 1,000.00
Jim Smith		2,000.00
Joe Smith		2,000.00
Judy Wyatt		2,000.00
Simon Whitney		2,000.00
Dick Schmidt		1,000.00
Chris Townsend		1,000.00
Denise Waite		100.00
Barry Brief		2,000.00
Sharon Ikemoto		100.00
Eric Adams		100.00
Winnie Petersen (Lou)		100.00
Grace Watts		
Nancy		
Geoff Cahoon		500.00
Chris Downey		
Bob Armstrong		100.00
	Total	$14,000.00

Hemingway's Tavern by the Sea

Phil Beukema		$ 100.00
Carl Husbands		250.00
	Total	$ 350.00

9304355325519

3/8/84

ACCOUNTS PAYABLE VOUCHER

ATTN: Chris Townsend
Requestor

OK TO PAY _____
Requestor Signature

Date Issued: 1/8/86

Vendor No. _____

Vendor: Postmaster: US POST OFFICE
Laguna Niguel, CA 92677

Pay from Account:
David Stein's Account: Loan

_____ _____
Entity Name of Bank Account

GL ACCT	PROJECT	DEPT	AMOUNT
			$ 260.00
			260.00

TOTAL $ _____

Invoice Date: N/A

Invoice No. N/A

Amount $ 260.00

P.O. No. N/A

Contract No. _____

Insurance _____ YES _____ N/A

Pay Schedule _____ YES _____ N/A

Bonds Required _____ YES _____ N/A

Approval _____

Special Instructions: (i.e. Hand Deliver, Return to Requestor, Separate Checks, Special Terms, etc.)

For: HART NATIONAL CABINET
Special Post Office Box #1986

FORM NO. 78425 WHITE - ACCOUNTING CANARY - ORIGINATING DEPT. PINK - ACCOUNTING

9304353252 0

Box # 6908

ON FEB 11, '86, I transferred our calling service over to a P.O. Box. A REBATE of _____ was not made, payable to David Stein.

Rich

Vender (Pa, . .

QUEST FOR DISBURSEMENT

Request Date _____

№ 26629

POSTMASTER
U.S. POST OFFICE
LAGUNA NIGUEL, CA 92677

Pay from Account:
Loan from
David Stein's Account

CO#	GL #	JOB #	COST CODE	LOT#	AMOUNT	COMMENTS
					260.00	Special Post Office Box 1986
			CHECK AMOUNT		$ 260.00	

Check Disposition:

—

Check Requested By: CHRIS TOWNSEND
FOR Rick Reiter
Hart National Cabinet

Approvals:

Marketing: _____ Operations: _____ G&A: _____

STR-103

9304353

THE PACIFIC CLUB

4110 MacArthur Boulevard
Newport Beach, California 92660

INVOICE

PHONE (714) 955-1151
ON ANY QUESTIONS
REGARDING THIS STATEMENT

000139

DATE 01/31/86

DAVID FRANKLYN STEIN
STEIN-BRIEF GROUP
29982 IVY GLENN, #100
LAGUNA NIGEL, CA 92677

AMOUNT ENCLOSED $ _____

PLEASE RETURN THIS PORTION OF STATEMENT WITH YOUR REMITTANCE

DATE	DESCRIPTION	CHARGE/CREDIT	SERVICE CHARGE	SALES TAX	TOTAL CHARGE/CREDIT	CURRENT BALANCE
	BALANCE FWRD:					1580.07
01/12	020930 BANQUETS Barry Hart	1037.50	192.50	69.30	1299.30	2879.37
01/21	080000 BANQUETS Ben's - Sea Fan	92.00	18.40	6.62	117.02	2996.39
01/31	070160 DINING ROOM Embassy	2.50	.50	.18	3.18	2999.57
01/31	000961 CREDIT MEMO	50.00-			50.00-	2949.57
01/31	001017 TELEPHONE 09	7.40			7.40	2956.97
01/31	MEMBERSHIP DUES	125.00			125.00	3081.97
01/31	MINIMUM SPENDING	50.00			50.00	3131.97
01/31	LATE CHARGE	22.95			22.95	3154.92
	TOTAL SALES TAX:			76.10		

CURRENT	PAST DUE		TOTAL
1624.85	1530.07	PLEASE PAY THIS AMOUNT →	3154.92

In accordance with Article XI, Section 3 of the By-Laws, all dues and other indebtedness of each Member shall be payable in the month in which they are billed and shall become delinquent if not paid on or before the last day of that month. A late charge in the amount of one and one-half (1½%) percent of the delinquent amount shall be added to amounts remaining unpaid for each month or partial month that charges are delinquent.

PAY LAST AMOUNT IN THIS COLUMN

THE PACIFIC CLUB

930435325222

STEIN-BRIEF GROUP

MEMORANDUM

To: David Stein

From: Christopher Townsend

Subject: Friends of Gary Hart Reimbursement to The Monarch Group

Date: September 10, 1987

Attached for your reference is a copy of a letter sent by The Monarch Group to Friends of Gary Hart requesting reimbursement for expenses incurred by the Monarch Group totalling $18,692.50 on behalf of major donor development via the Hart National Cabinet.

The letter was sent in response to a conversation I had with Patti Sampers on August 29th. She informed me that the Friends of Gary Hart committee was still expecting to receive the $30,000 garnished from the event at The Palace on March 15th and the $100,000 C.D. that was attached by one of the AWH Hart creditors. At this time they have only accounted for about $80,000 in outstanding bills to be payed by these funds; therefore, there could be a surplus left to pay off our debt. She asked me to submit the invoice as soon as possible since it was just a matter of legal proceedings before the money would be received, which could be any day soon.

9304353252523

2482 Ivy Glenn
Laguna Niguel, CA 92677
714-362-8005

THE MONARCH GROUP

29982 Ivy Glenn Drive
Laguna Niguel, CA 92677

September 10, 1987

Patti Sampers
525 Milwaukee
Denver, CO 80206

Dear Patti:

Enclosed please find an invoice with itemized receipts from The Monarch Group in the amount of $18,692.50 for direct expenses incurred by The Monarch Group on behalf of a major donor recruitment program for The Friends of Gary Hart committee.

We would appreciate prompt remittance of the amount as soon as possible. If you have any questions or need additional information, please contact me at (714) 859-6995.

Yours Truly,

Christopher Townsend
President

CT/jh

9304353252 4

April 10. 1986

Dear

As a fellow supporter of Senator Gary Hart. I know you will be excited about the enclosed information regarding a new program for key members of the Hart organization: The Hart Cabinet.

The Cabinet is a special program for Hart supporters with a specific goal to retire Gary's 1984 presidential campaign debt before the end of 1986. In order to help accomplish this goal. membership in the Cabinet requires an individual to make a financial contribution of $1.000 to Americans With Hart after January 1. 1986.

A Key element to the success of the Cabinet is the ability of members to finance the $1.000 contribution. Through a special loan program. members can finance their contribution over a period of one or two years at low monthly payments of $88.85 and $47.08. respectively. Refer to the enclosed materials for further details.

Please complete and return the enclosed forms immediately so that you can begin to enjoy benefits of the Cabinet and help Gary reduce his debt. Contact me if you have any questions or need additional information.

In the meantime. please accept my thanks in advance for your continued support for Gary and the common vision we share for our country. I look forward to hearing from you soon.

Yours truly.

Chris Townsend

CT:I

CC: David Stein
Rick Rider
Chron
HNC

9304355325525

PO Box 4008 · Mission Viejo, CA 92677 · 714 581 1946

April 10, 1996
Hart National Central
Letter Sent To the Following:

Mr. Jack Baldwin
#6 Moonshadow
Irvine, CA 92714

Ms. Sherry Baum
915 Catalina Ave.
Seal Beach, CA 90740

Ms. Sally Bellevue
400 El Bacque
Laguna Beach, CA 92651

Ms. Sara Cano
1806 N. Ferryview, Apt. F
Santa Ana, CA 92701
714-554-7406 res.
714-554-7425 bus.

Mr. Paul Cohen
274 Cliff Drive, Apt. 1
Laguna Beach, CA 92651
714-494-6087 res.

BPC/BPF

Mr. and Mrs. Tom Daly
732 North Clementine
Anaheim, CA 92805
714-991-4366 res.
714-804-3440 bus.

Ms. Diane Dillon
3201 Yorba Linda Blvd., #251
Fullerton, CA 92601

Mr. Steve Epstein
2003 West Balboa Blvd., #247
Newport Beach, CA 92663-4093

Mrs. Jane Guerin
BUCHALTER, NEMER, FIELDS,
CHRYSTIE & YOUNGER
610 Newport Center Dr., #1000
Newport Beach, CA 92660
714-760-1121

LM (Yes) - via BS sponsor

Mr. John R. Hanna
HORTON, BARBARO & REIL
200 North Main, 2nd Floor
Santa Ana, CA 92701

(Yes) (Get info over the phone)

Mr. Kurt Haunfelner
134 - 5th Street, #2B
Seal Beach, CA 90740
213-596-5218 res.
213-620-2560 bus.

Mr. Brad Krevoy, Senior V.P.
CONCORDE/CINEMA GROUP
11600 San Vicente Blvd.
Los Angeles, CA 90049
213-470-2030 res.
213-820-6733 bus.

Ms. Linda Moulton
9125 Caladium Ave.
Fountain Valley, CA 92708
714-850-1905 res.

Mr. Dan Rasmus
3410 S. Main St., #E1 (NO)
Santa Ana, CA 92707
714-546-7892 bus.

Mr. Bernie Schneider
BUCHALTER, NEMER, FIELDS,
CHRYSTIE & YOUNGER
610 Newport Center Dr., #1000
Newport Beach, CA 92660
714-760-1121 res

Mr. Jeff Su
c/o Kate Clark
5711 Sierra Cielo
Irvine, CA 92715
714-854-7406 res.

Ms. Janet Verga
16921 Park Avenue
Sunset Beach, CA 90742

Mr. Alan Wood
12109 Sylvan River, #126
Fountain Valley, CA 92708
714-839-0543 res.
213-478-8241 bus.

Mr. Earl Wooden
1422 River Lane
Santa Ana, CA 92706
714-541-8659 res.
714-771-8532 bus.

9304352527

Ms. Joanne Yuen
SOUTHCOAST ESCROW COMPANY
30100 Crown Valley Parkway
Laguna Niguel, CA 92677
714-831-2051 ous.

93043532528

STEIN-BRIEF GROUP

MEMORANDUM

To: Richard Wagner

From: Chris Townsend

Subject: Hart Cabinet Program

Date: 11-4-85

Per our meeting today with David Stein, the following is a list of items you need to collect and forward to our office as soon as possible:

1. List of state coordinators for Hart.

2. List of Hart National Finance Committee members and Executive Committee members.

3. List of contributors to American With Hart divided into the following categories: $1,000; $500 - $1,000; and $250 - $500.

4. List of contributors to the fundraising dinner hosted by Steve Moses in Los Angeles on November 2.

5. List of potential state chairs for Hart Cabinet (at least two candidates per state for all 50 states).

6. List of potential Board of Directors for the key states (California, Florida, New York, Texas, Colorado).

7. List of names prepared for David Stein by Billy Shore.

8. List of potential Founders of the Hart Cabinet on a national level.

9. List of contributors to the Hart for Senate '86 Campaign Committee.

cc: Bill Dixon
David Stein

9304353252529

HOLD

THE MONARCH GROUP
29982 Ivy Glenn
Laguna Niguel, CA 92677

714/859-6995

January 22, 1987

Mr. Richard Wagner
AMERICANS WITH HART
P. O. Box 75356
Washington, D.C. 20013

Dear Richard:

On behalf of David Stein and Rick Reiter, attached please find an accounting of all monies raised via the Hart National Cabinet since September 23, 1986.

Enclosed you will find checks and a schedule totaling $3,520.00. Per our understanding of the 20% agreement, the amount due to The Monarch Group for this batch of checks is $704.00.

Also enclosed is a copy of our invoice dated September 23, 1986, in the amount of $940.00. We would appreciate your remittance of the combined total of $1,644.00 due to The Monarch Group as soon as possible.

Please feel free to contact me if you have any questions or need additional information.

Yours truly,

Christopher Townsend

CT/jes
Enclosures

cc: Mike Novelli
David Stein
Rick Reiter

9304353253O

CONTRIBUTIONS RECEIVED VIA HART NATIONAL CABINET

(9/22/86 - 1/22/87)

Howard L. Ecker		$1,000.00
Robert Leslie Haken		500.00
Mary Reese Green		1,000.00
E. Evan Shaffer, III		20.00
Barbara J. Braswell		750.00
Barbara J. Braswell		250.00
	TOTAL:	$3,520.00

2304335325311

HOWARD L. ECKER
640 W. WEBSTER
CHICAGO, ILL. 60614

4080

SEPT 29 1986

2-100
710

PAY TO THE ORDER OF AMERICANS WITH HART $ 1000.00

ONE THOUSAND DOLLARS + 00/100 DOLLARS

MARINA BANK
CHICAGO, ILLINOIS 60601

FOR CONTRIBUTION

Howard L. Ecker

[redacted]

⑈930435325332

HART NATIONAL CABINET
MEMBERSHIP APPLICATION

Name HOWARD L. ECKER

Mailing Address 400 North State Street, Chicago, Il. 60610
Home ( ) Office (X)

Zip

Home Phone 472-4819 Work Phone 726-3330

SPONSOR David Stein STATE CA.

Age 42 Congressional District 7th

Occupation Commercial Real Estate Broker Employer Self (Howard Ecker & Co.)

Birthdate 6/10/44

POLICY CONCERNS:

National Security ( ) Economic & Social Justice (✓)

Human Investment & Economic Modernization/Competitiveness ( )

Energy and Environment ( )

FINANCE COMMITMENT:

Check (✓)

Financing ( )

Signature Howard L. Ecker Date 10-3-84

HART NATIONAL CABINET
P.O. BOX 6908
MONARCH BEACH, CA 92677
(714) 581-1986

9304353253533

Howard Ecker & Co./Real Estate
400 North State Street • Chicago, Illinois 60610 • (312) 726-3330

October 20, 1986

Mr. David F. Stein
Chairman
Hart National Cabinet
P.O. Box 6908
Monarch Beach, California 92677

Dear David:

As a follow-up to your recent letter and my donation to the Gary Hart Cabinet, I wanted to indicate that I was at a breakfast hosted by Scott Hodes for Gary last week.

Furthermore, I indicated to Scott that I would be a contributor for Gary and I was hoping that the contribution that I have already made could be in some way credited to Scott's "account".

Very truly yours,

HOWARD ECKER & CO.

Howard L. Ecker
President

:pab
Encl.

cc: Scott Hodes

9304353253534

930435312535

ROBERT LESLIE HAKEN
1321 HOPKINS AVENUE
PALO ALTO, CA 94301

1273

OCTOBER 15, 1986

90-2067/1211

PAY TO THE ORDER OF AMERICANS WITH HART $ 500.00

Five hundred and NO/100 DOLLARS

CENTRAL BANK
STEVENS CREEK OFFICE
3290 STEVENS CREEK BLVD. SAN JOSE, CALIFORNIA 95117

MEMO

Robert L. Haken

[redacted]

ROBERT LESLIE HAKEN
1321 HOPKINS AVENUE
PALO ALTO, CA 94301

1273

OCTOBER 15, 1986

90-2067/1211

PAY TO THE ORDER OF AMERICANS WITH HART $ 500.00

Five hundred and NO/100 DOLLARS

CENTRAL BANK
STEVENS CREEK OFFICE
3290 STEVENS CREEK BLVD. SAN JOSE, CALIFORNIA 95117

MEMO

Robert L. Haken

[redacted]

DONALD ROSS GREEN
MARY REESE GREEN
[redacted]
P.O. BOX 3284
MONTEREY, CA 93940

2036

10/20 1986

90-162/1211

PAY TO THE ORDER OF Americans With Hart $ 1,000.00

One-thousand and no/100 DOLLARS

COUNTY BANK AND TRUST
CARMEL OFFICE
Phone No. 624-8033
Dolores Street Between 7th & 8th Avenues
Carmel-by-the-Sea, California 93921

MEMO Cabinet

Mary Reese Green

[redacted]

930435325336

February 13, 1989

Mr. Jonathan Bernstein
Federal Election Commission
999 E Street NW
Washington, D.C. 20463

RE: MUR 2583 (Pierre E. Loubet)

Dear Mr. Bernstein:

As per our phone conversation, I am writting to explain why I did listen to Mr. Karl and the reasons for my violations--and to ask for leniency.

As stated: My Karl was rather persistant in his solicitation for contributions--even while I was on the road working; to the point that I felt I may experience a lateral career shift if I did not follow his word.

Obviously I should have known (common sense) that something was wrong.

I truely believed that Mr. Karl was using our names to create a roster of democratic support for Mr. Hart--a show that Mr. Karl could gather support, for Democrats, in Orange CO. (a stricly republican strong hold).

In turn, I believed that this roster would gain him recognition, for these people would show a swing towards democratic positioning. I thought that the true test would come when these people voted republican--like me. I felt that if he wanted to create this false gathering to higthen his awareness, that it was just part of his insecurities.

I in no way knew that the issue was money! Because he solicited so many in such a visable manner.

Sir, I wish to make restitution! However, the whole Lorimar "scandle" (Mr. Karl. Mr. Hunt, Mr. Shannon breach of ethics, and the campaign contribution publicity) caused many, including myself to lose our job. It fact it has proven very difficult to gain consistant work. Sir, it is for that reason that I ask for leniency. I have not received a regular income for four months; money is very tight for me.

I know that the F.E.C. views this whole matter as a major issue--I appreciate their stand! I have learned and suffered long enought.

2304355325537

Sincerely,

Pierre E. Loubet

enlcosure:

Pierre E. Loubet
2334 Naples
Newport Beach, CA 92660
714-721-8923
714-759-7704

9304353253538

06C1951

RECEIVED
FEDERAL ELECTION COMMISSION
ADMINISTRATIVE DIVISION

89 FEB 27 AM 9:13

LAW OFFICES
TALCOTT, LIGHTFOOT, VANDEVELDE
WOEHRLE & SADOWSKY
THIRTEENTH FLOOR
655 SOUTH HOPE STREET
LOS ANGELES, CALIFORNIA 90017

ROBERT M. TALCOTT
MICHAEL J. LIGHTFOOT
JOHN D. VANDEVELDE
CARLA M. WOEHRLE
STEPHEN B. SADOWSKY
MARIA E. STRATTON
JOHN S. CROUCHLEY

AREA CODE 213
622-4750

TELECOPIER
622-2690

February 21, 1989

89 FEB 27 AM 9:13

Lawrence M. Noble
General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 2583
Linda Kinwald

Dear Mr. Noble:

I received your letter dated February 6, 1983 with a proposed conciliation agreement for Ms. Kinwald. Unfortunately, last week I was advised that Ms. Kinwald died on Tuesday, February 14, 1989, as a result of injuries she sustained in a terrible traffic accident. I have not troubled her family for a Certificate of Death or other documents to verify that fact. If such documentation is necessary for you to close this matter as to Ms. Kinwald, please let me know.

Responses will be forthcoming as to the other four individuals for whom you have proposed conciliation agreements.

Yours very truly,

TALCOTT, LIGHTFOOT, VANDEVELDE
WOEHRLE & SADOWSKY

John D. Vandevelde

JOHN D. VANDEVELDE

JDV:idr

cc: Michael Berman

2304353253539

DOC 1998

RECEIVED
FEDERAL ELECTION COMMISSION
ADMINISTRATIVE DIVISION
89 FEB 27 AM 11:01

SAIBER SCHLESINGER SATZ & GOLDSTEIN
ATTORNEYS AT LAW
ONE GATEWAY CENTER
NEWARK, N.J. 07102-5311

(201) 622-3333
TELECOPIER: (201) 622-3349

NORMAN E. SCHLESINGER
DAVID M. SATZ, JR.
GERALD P. SEID
BRUCE I. GOLDSTEIN+
WILLIAM F. MADERER+
DAVID J. D'ALOIA*
JAMES H. AIBEL

SAMUEL S. SAIBER
OF COUNSEL

STEVEN S. GOLDENBERG
SEAN R. KELLY
ROBIN B. HORN
DAVID J. SATZ
JOAN M. SCHWAB
NANCY SIVILLI
ROBERT B. WEINSTOCK
LOUIS H. MIRON
MARY FRAN FARLEY
ROBERT B. NUSSBAUM

+ CERTIFIED CIVIL AND CRIMINAL TRIAL ATTORNEY
* CERTIFIED CIVIL TRIAL ATTORNEY

February 24, 1989

89 MAR -1 PM 3:40

Celia Jacoby, Esquire
Federal Election Commission
999 E Street NW
Washington, D.C. 20468

Re: Janis Klinger - MUR 2583

Dear Ms. Jacoby:

Pursuant to our telephone conversation, I am furnishing you with the executed Conciliation Agreement and a check in the amount of $125, in conformity with the settlement of the above matter. Would you please return a fully executed copy of the Agreement for our files.

Thank you for your attention.

Sincerely,

DAVID M. SATZ, JR.

DMS:mp

cc: Mrs. Richard Klinger

2304353254O

GARY HART
FOR PRESIDENT

OAC 2134
Mur 2583

March 5, 1989

Mr. Lawrence M. Noble
General Counsel
Federal Election Commission
999 E Street NW
Washington, DC 20463

Reference: Committee #C00159251
Americans with Hart, Inc.

Dear Mr. Noble:

Please be advised that Mr. Kenton Granger has submitted his resignation as Treasurer of Americans with Hart, Inc. I have accepted the position of Treasurer, effective immediately.

Please address any future correspondence regarding this Committee to

Mr. Bernard E. Schneider
660 Newport Center Drive, Suite 1400
Newport Beach, CA 92660

with a copy to

Americans with Hart, Inc.
c/o Generation Plus
1325 South Colorado Blvd. Suite 504
Denver, CO 80222

Very truly yours,

Bernard E. Schneider

89 MAR 13 PM 1:04

RECEIVED
FEDERAL ELECTION COMMISSION
ADMINISTRATION DIVISION

89 MAR 13 AM 9:01

23043532541

Paid By Americans With Hart, Inc.

06C2358

RECEIVED
FEDERAL ELECTION COMMISSION
ADMINISTRATIVE DIVISION

89 APR -3 AM 11:05

LAW OFFICES
WUNDER & DIEFENDERFER
1615 L STREET, N. W., SUITE 650
WASHINGTON, D. C. 20036
(202) 659-3005
TELECOPIER 659-3010

89 APR -3 PM 3:25

March 31, 1989

Jonathan Bernstein, Esq.
Office of the General Counsel
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

RE: MUR 2583

Dear Mr. Bernstein:

Attached hereto for your information and review is a letter which I received this date from Peter Kahn, Esquire regarding the production of the documents which the Federal Election Commission has subpoenaed in MUR 2583.

I trust this is responsive to your telephone inquiry of March 29, 1989.

Very truly yours,

Paul E. Sullivan

cc: Peter Kahn

9304353254 2

LAW OFFICES

WILLIAMS & CONNOLLY

HILL BUILDING

839 SEVENTEENTH STREET, N.W.

WASHINGTON, D.C. 20006

AREA CODE 202

331-5000

EDWARD BENNETT WILLIAMS (1920-1988)
PAUL R. CONNOLLY (1922-1978)

VINCENT J. FULLER
RAYMOND W. BERGAN
STUART E. SEIGEL
JEREMIAH C. COLLINS
ROBERT L. WEINBERG
DAVID POVICH
STEVEN M. UMIN
JOHN W. VARDAMAN, JR.
PAUL MARTIN WOLFF
J. ALAN GALBRAITH
JOHN G. KESTER
WILLIAM E. McDANIELS
BRENDAN V. SULLIVAN, JR.
AUBREY M. DANIEL, III
RICHARD M. COOPER
GERALD A. FEFFER
ROBERT P. WATKINS
JERRY L. SHULMAN
LAWRENCE LUCCHINO
LEWIS H. FERGUSON, III
ROBERT B. BARNETT
DAVID E. KENDALL
GREGORY B. CRAIG
JOHN J. BUCKLEY, JR.
TERRENCE O'DONNELL
DOUGLAS R. MARVIN

JOHN K. VILLA
BARRY S. SIMON
KEVIN T. BAINE
STEPHEN L. URBANCZYK
PHILIP J. WARD
ELLEN SEGAL HUVELLE
FREDERICK WHITTEN PETERS
PETER J. KAHN
JUDITH A. MILLER
LON S. BABBY
SCOTT BLAKE HARRIS
MICHAEL S. SUNDERMEYER
JAMES T. FULLER, III
DAVID O. AUFHAUSER
BRUCE R. GENDERSON
CAROLYN N. WILLIAMS
F. LANE HEARD, III
STEVEN R. KUNEY
JAMES A. BRUTON, III
ROBERT S. LITT
GERSON A. ZWEIFACH
SARAH HELENE DUGGIN
PAUL HOGIN
DANIELA WINKLER
JEFFREY B. KINDLER
HOWARD W. GUTMAN

NANCY F. PREISS
RICHARD S. HOFFMAN
P. MICHELE ELLISON
STEVEN A. STEINBACH
MARY G. CLARK
MARK S. LEVINSTEIN
DIANNE J. SMITH
CHERRY JOY BEYSSELANCE
VICTORIA L. RADD
GEORGE ELLARD
DANIEL F. KATZ
JEFFERSON M. GRAY
MANLEY W. ROBERTS
ELENI M. CONSTANTINE
NICOLE K. SELIGMAN
LAURA P. MASUROVSKY
ROBERT M. KRASNE
KATHLEEN L. BEGGS
MAUREEN T. CANNON
WILLIAM R. MURRAY, JR.
EVA M. PETKO
CYNTHIA C. HOGAN
MARK J. HULKOWER
KAREN ZACHARIA
BRUCE S. OLIVER
MATTHEW D. LERNER
STEPHEN D. RABER
DAVID C. KIERNAN
JOHN D. CLINE
CHRISTOPHER B. MEAD

BRENT J. GURNEY
CHRISTOPHER C. KEARNEY
JOHN P. MONAHAN, III
THOMAS J. MURPHY
KEVIN J. HASSON
JENNY A. DURKAN
MARIE T. REILLY
NANCY A. BARD*
HEIDI K. HUBBARD
PETER W. CHATFIELD*
EVAN J. ROTH
MARK A. SREBE
ROBIN E. JACOBSOHN
PAUL BUTLER*
CHARLES A. SWEET
GREGORY A. BAER*
GLENN J. PFADENHAUER
WILLIAM K. LAYMAN
GEORGE A. BORDEN*
ROBERT J. SHAUGHNESSY*
NANCY TORRESEN*
JONATHAN P. GRAHAM*
DAVID N. WECHT*
J. LEIB DODELL*
WILLIAM M. WILTSHIRE*
ELISABETH A. BRESEE*
DEMETRA LAMBROS*
BARBARA A. MACK*
J. ROGER WILLIAMS, JR.*

COUNSEL
CHARLES H. WILSON
LYMAN G. FRIEDMAN

*NOT ADMITTED IN DC

March 30, 1989

Paul E. Sullivan, Esquire
Wunder & Diefenderfer
Suite 650
1615 L Street, N.W.
Washington, D.C. 20036

Re: G. Stuart Karl

Dear Paul:

This letter is in response to your telephone call yesterday relaying the Federal Election Commission's query concerning Stuart Karl's compliance with the Commission's subpoena for the production of documents in MUR 2583.

As I wrote you on December 9, 1988 all documents in Mr. Karl's possession relating to this matter were turned over some time ago to the grand jury sitting in the Central District of California. Those documents have not been returned and therefore, as the documents are not in Mr. Karl's custody or control, he is not in a position to respond to the subpoena at this time other than to say he does not have the documents called for.

If you have any additional questions please feel free to contact me.

Very truly yours,

Peter J. Kahn

PJK:jln

9304355325543

OGC 2943

LAW OFFICES OF
BAGATELOS & FADEM
THE INTERNATIONAL BUILDING
601 CALIFORNIA STREET
SUITE 1801
SAN FRANCISCO, CALIFORNIA 94108

BARRY FADEM
PETER A. BAGATELOS
WES VAN WINKLE

TELEPHONE
(415) 982-7100
FAX
(415) 982-1085

FEDERAL ELECTION COMMISSION
ADMINISTRATIVE DIVISION
89 JUN -5 PM 12:36

May 24, 1989

Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Attn: Jonathan Bernstein, Esq.

Dear Mr. Bernstein:

A Statement of Designation of Counsel, dated April 7, 1988, was submitted by respondent Stuart Karl, designating Peter Bagatelos as counsel with respect to MUR 2583.

This is to advise you that I have withdrawn as counsel for Stuart Karl and am no longer representing him with respect to MUR 2583. The aforedescribed Statement of Designation of Counsel should therefore be considered void and of no effect as of June 1, 1989.

Please contact me if you have any questions as to this matter.

Very truly yours,

Peter A. Bagatelos

Peter A. Bagatelos

PAB/mlq

cc: Stuart Karl

89 JUN -6 AM 8:17

2304353254

06C2969

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2583

NAME OF COUNSEL: John W. Vardaman, Jr.
Peter J. Kahn

ADDRESS: Williams & Connolly
839 - 17th Street, N.W.
Washington, D.C. 20006

TELEPHONE: (202) 331-5000

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

5/30/89
Date

Stuart Karl
Signature

RESPONDENT'S NAME: G. Stuart Karl

ADDRESS:

HOME PHONE:

BUSINESS PHONE:

9304335325545

RECEIVED FEDERAL ELECTION COMMISSION 89 JUN -7 PM 3:39

FEDERAL RECEIVED

BEFORE THE FEDERAL ELECTION COMMISSION

99 JUL -6 PM 2:28

In the Matter of	)	
	)	
Edward Hanlon	)	MUR 2583
Ellen-Jayne Oshins	)	
Pierre E. Loubet	)	
Janis S. Klinger, et. al.	)	

SENSITIVE

GENERAL COUNSEL'S REPORT

I. CONCILIATION PROPOSALS

Attached for Commission approval are proposed conciliation agreements submitted on behalf of four individual respondents in the above-captioned matter.

2304355325546

II. NO FURTHER ACTION RECOMMENDATION

It has come to the attention of this Office that respondent Linda Kinwald died recently. (Attachment One) Under this circumstance, this Office recommends that the Commission take no further action in this matter and close the file as to this respondent.

III. RECOMMENDATION

1. Take no further action as to Linda Kinwald, and close the file as to this respondent.

2. Accept the attached proposed conciliation agreements of Edward Hanlon, Janis S. Klinger, Ellen-Jayne Oshins, and Pierre Loubet.

3. Close the file as to these respondents.

4. Approve the attached letters.

June 5, 1989
Date

Lawrence M. Noble
General Counsel

Attachments
1. Kinwald Letter
2. Hanlon Conciliation Agreement
3. Oshins Conciliation Agreement
4. Klinger Conciliation Agreement
5. Loubet Conciliation Agreement
6. Proposed Letters (5)

Staff Persons: Patty Reilly and Jonathan Bernstein

9304353254 7

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Edward Hanlon	)	
Ellen-Jayne Oshins	)	MUR 2583
Pierre E. Loubet	)	
Janis S. Klinger, et al.	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 16, 1989, the Commission decided by a vote of 5-1 to take the following actions in MUR 2583:

1. Take no further action as to Linda Kinwald, and close the file as to this respondent.

2. Accept the proposed conciliation agreements of Edward Hanlon, Janis S. Klinger, Ellen-Jayne Oshins, and Pierre Loubet, as recommended in the General Counsel's Report signed June 5, 1989.

3. Close the file as to these respondents.

4. Approve the letters, as recommended in the General Counsel's Report signed June 5, 1989.

Commissioners Aikens, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision, Commissioner Elliott dissented.

Attest:

6-19-89
Date

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

Received in the Office of Commission Secretary: Tues., 6-06-89, 2:28
Circulated on 48 hour tally basis: Tues., 6-06-89, 4:00
Deadline for vote: Fri., 0-16-89, 4:00

cmj

9304435325548

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 23, 1989

James D. Henderson, Esquire
Shea & Gould
1800 Avenue of the Stars
Suite 600
Los Angeles, CA 90067

RE: MUR 2583
Ellen-Jayne Oshins

Dear Mr. Henderson:

On June 16, 1989, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your client's behalf in settlement of a violation of 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter. This matter will become a part of the public record within 30 days after it has been closed with respect to all other respondents involved. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

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 copy of the fully executed conciliation agreement for your files. If you have any

9304353254 9

questions, please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

9304355325550

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Ellen-Jayne Oshins) MUR 2583

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (the "Commission") pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Ellen-Jayne Oshins (the "Respondent") violated 2 U.S.C. § 441f.

NOW, THEREFORE, the Commission and the Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent 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. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

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

1. Respondent is a former employee of Karl Home Video, Inc. and of Karl-Lorimar Home Video, Inc., companies organized under the laws of California. Stuart Karl was the president of these companies.

2. Respondent was asked by her employer, Mr. Karl, or at his direction to make a contribution by writing a check for $1,000.00 to Americans With Hart, Inc.

9304335325551

3. Respondent made the solicited contribution and thereafter accepted reimbursement in cash for that contribution from her employer, Mr. Karl.

V. Respondent allowed her name to be used to effect contributions by her employer in violation of 2 U.S.C. § 441f.

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of Two Hundred Fifty Dollars ($250.00) 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.

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

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and

9304353255 2

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 enforceable.

FOR THE COMMISSION:

/s/
Lawrence M. Noble
General Counsel

Date

FOR THE RESPONDENT:

Ellen-Jayne Oshins
Ellen-Jayne Oshins

3/1/89
Date

9304355325553

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 23, 1989

David M. Satz, Jr.
Saiber, Schlesinger, Satz, & Goldstein
One Gateway Center
Newark, NJ 07102-5311

RE: MUR 2583
Janis Klinger

Dear Mr. Satz:

On June 16, 1989, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your client's behalf in settlement of a violation of 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter. This matter will become a part of the public record within 30 days after it has been closed with respect to all other respondents involved. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

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 copy of the fully executed conciliation agreement for your files. If you have any

9304335325554

questions, please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

2304335325555

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Janis Klinger) MUR 2583

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (the "Commission") pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Janis Klinger (the "Respondent") violated 2 U.S.C. § 441f.

NOW, THEREFORE, the Commission and the Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent 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. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

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

1. Respondent is a former employee of Karl Record Corp., a company organized under the laws of California. Stuart Karl was the president of Karl Record Corp.

2. Respondent was asked by her employer, Mr. Karl, or at his direction to make a contribution by writing a check for $250.00 to Americans With Hart, Inc.

9304353255 6

3. Respondent made the solicited contributions and thereafter accepted reimbursement in cash for those contributions from her employer, Mr. Karl.

V. Respondent allowed her name to be used to effect a contribution by her employer in violation of 2 U.S.C. § 441f.

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of One Hundred Twenty-five Dollars ($125.00) 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.

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

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

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oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

/s/
Lawrence M. Noble
General Counsel

Date

FOR THE RESPONDENT:

Janis Klinger

Janis Klinger

2/22/89
Date

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 23, 1989

Pierre E. Loubet
2334 Naples
Newport Beach, CA 92600

RE: MUR 2583
Pierre E. Loubet

Dear Mr. Loubet:

On June 16, 1989, the Federal Election Commission accepted the signed conciliation agreement and civil penalty you submitted in settlement of a violation of 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter. This matter will become a part of the public record within 30 days after it has been closed with respect to all other respondents involved. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

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 copy of the fully executed conciliation agreement for your files. If you have any questions

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please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Pierre E. Loubet) MUR 2583

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (the "Commission") pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Pierre E. Loubet (the "Respondent") violated 2 U.S.C. § 441f.

NOW, THEREFORE, the Commission and the Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent 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. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

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

1. Respondent is a former employee of Karl Home Video, Inc. and of Karl-Lorimar Home Video, Inc., companies organized under the laws of California. Stuart Karl was the president of these companies.

2. Respondent was asked by his employer, Mr. Karl, or at his direction to make contributions by writing checks for $500.00 to Americans With Hart, Inc. and for $500.00 to Carol Ann Bradford for Congress.

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3. Respondent made the solicited contributions and thereafter accepted reimbursement in cash for these contributions from his employer, Mr. Karl.

V. Respondent allowed his name to be used to effect contributions by his employer in violation of 2 U.S.C. § 441f.

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of Three Hundred Dollars ($300.00) 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.

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

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and

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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 enforceable.

FOR THE COMMISSION:

/s/

Lawrence M. Noble
General Counsel

Date

FOR THE RESPONDENT:

Pierre E. Loubet

Pierre E. Loubet

2-13-89

Date

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 23, 1989

Edward Hanlon
23 Fallinstar
Irvine CA, 92714

RE: MUR 2583
Edward Hanlon

Dear Mr. Hanlon:

On June 16, 1989, the Federal Election Commission accepted the signed conciliation agreement you submitted in settlement of a violation of 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter. This matter will become a part of the public record within 30 days after it has been closed with respect to all other respondents involved. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

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 copy of the fully executed conciliation agreement for your files. Please note that your civil penalty is due thirty days from the date the Commission signs this agreement. If you have any questions please

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contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

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FEDERAL ELECTION COMMISSION
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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Edward Hanlon	)	MUR 2583
	)	
	)	

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (the "Commission") pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Edward Hanlon (the "Respondent") violated 2 U.S.C. § 441f.

NOW, THEREFORE, the Commission and the Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent 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. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

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

1. Respondent is a former employee of Karl Home Video, Inc. and of Karl-Lorimar Home Video, Inc., companies organized under the laws of California. Stuart Karl was the president of these companies.

2. Respondent was asked by his employer, Mr. Karl, or at his direction to make a contribution by writing a check for $250.00 to Americans With Hart, Inc.

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3. Respondent made the solicited contribution and thereafter accepted reimbursement in cash for that contribution from his employer, Mr. Karl.

V. Respondent allowed his name to be used to effect contributions by his employer in violation of 2 U.S.C. § 441f.

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of One Hundred Twenty-Five Dollars ($125.00) 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 have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and

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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 enforceable.

FOR THE COMMISSION:

/s/
Lawrence M. Noble
General Counsel

Date

FOR THE RESPONDENT:

Edward Hanlon

3/10/87
Date

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 23, 1989

John D. Vandevelde, Esquire
Talcott, Lightfoot, Vandevelde,
Woehrle, & Sadowsky
655 South Hope Street
Los Angeles, CA 90017

RE: MUR 2583
Linda Kinwald

Dear Mr. Vandevelde:

The Office of the General Counsel is in receipt of your letter regarding the recent death of Linda Kinwald. In view of this circumstance, the Commission determined to take no further action and closed the file as to Ms. Kinwald.

If you have any questions, please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

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FEDERAL ELECTION COMMISSION
89 JUN -6 PM 2:28

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2583
Richard Klinger and George Unwin)

GENERAL COUNSEL'S REPORT

SENSITIVE

I. BACKGROUND

This matter originally came before the Federal Election Commission (the "Commission") on March 1, 1988. At that time the Commission found reason to believe that certain individuals had made political contributions which were subsequently reimbursed by their employer, Stuart Karl or Karl Home Video, Inc. ("KHV").1/ This Office believed that in light of the allegations each contribution by a KHV employee was suspect. However, reason to believe determinations were limited at that time to those individuals who had publicly acknowledged participating in a check-swapping scheme.

An investigation was commenced in this matter. During that investigation it was determined that contributions to federal candidates had been repaid to the contributors by Mr. Karl. On June 14, 1988, the Commission found reason to believe that certain individuals employed by or associated with Mr. Karl had exchanged contribution checks for cash at Mr. Karl's behest. Notification of this determination and interrogatories were sent to each individual. The responses received disclosed that Richard Klinger and George Unwin had apparently accepted

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1/ The assets of KHV were acquired by Lorimar Telepictures Corporation, and the company name changed to Karl-Lorimar Home Video, Inc. KHV is herein used to denote the company as originally named and as renamed.

reimbursement for their political contributions. Accordingly, it appears that Richard Klinger and George Unwin participated in this check-swapping scheme contrary to the Federal Election Campaign Act of 1971, as amended.

According to a response received from Janis Klinger, her spouse was requested to make a contribution to Americans With Hart, Inc. (referred to in the response as "the Friends of Gary Hart"). This contribution was for $250 and Mr. Klinger is said to have been reimbursed for this contribution. (Attachment One at pages 2-3)

It also appears George Unwin made a contribution to the Carter for Congress Committee ("Carter Committee") that was reimbursed by Stuart Karl. On March 31, 1988, the Carter Committee requested an advisory opinion from the Commission regarding its refund obligations of contributions believed to have been made in the name of another, including a contribution purportedly made by Mr. Unwin. Correspondence from the Carter Committee indicates that it contacted Mr. Unwin requesting whether his contribution was reimbursed by "Stuart Karl, or from Karl/Lorimar, or from any other entity..." (Attachment Two at page 5) The Carter Committee stated that if a reimbursement had been made "this campaign does not wish to retain this money." Id. In reply, Mr. Unwin returned the Carter letter with the notation "PLEASE RETURN CONTRIBUTION!!" It is the opinion of the

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Carter Committee that, although not entirely clear, Mr. Unwin was reimbursed by Stuart Karl. This conclusion is further supported by the sworn testimony of Rama L. Middel, Stuart Karl's former secretary, who also believes that Mr. Unwin was reimbursed for contributions made to the Hart campaign. (Middel Deposition at pages 104-106)

II. FACTUAL AND LEGAL ANALYSIS

Section 441f of Title 2, United States Code makes it unlawful for any person to make a contribution in the name of another or for any person to knowingly permit his or her name to be used for that purpose. Numerous employees of Stuart Karl or of KHV and others associated with Mr. Karl apparently made contributions to various political committees at his request. Afterwards those individuals were reimbursed in cash for the contributions made. Thus, by drafting a check to a political committee, the payer was the apparent contributor. However, by accepting reimbursement for such contribution, the payer has disguised the true origin of the funds contributed.

The evidence obtained strongly suggests that Messrs. Klinger and Unwin may have permitted their names to be used to make contributions for which they were later reimbursed in violation of 2 U.S.C. § 441f.2/

2/ Mr. Klinger contributed $250 to Americans With Hart, Inc. on February 6, 1984. Mr. Unwin's contributions were $1000 each to Americans With Hart, Inc. on 6-1-84; to Dave Carter for Congress on 5-28-84; and to Citizens for Townsend, Inc. on 9-23-86.

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Accordingly, this Office recommends that the Commission find reason to believe that Richard Klinger and George Unwin violated 2 U.S.C. § 441f. To continue the investigation into these matters, this Office also requests the Commission's approval of written questions. These questions are identical to the ones previously approved by the Commission for the other individual contributors in this matter.

At this juncture there continues to be no allegations or information that the Carter and the Townsend Committees, the recipients of Mr. Unwin's apparently reimbursed contributions, knew at that time of the reimbursement that the contributions were made in the name of another. Should the investigation disclose knowing receipt or other participation by these recipient committees, this Office will make further recommendations to the Commission.

III. **RECOMMENDATIONS**

1. Find reason to believe that Richard Klinger and George Unwin violated 2 U.S.C. § 441f.

2. Approve the attached letters, Factual and Legal Analyses and questions.

June 5, 1989
Date

LM Noble (GJZ)
Lawrence M. Noble
General Counsel

Attachments
1. Janis Klinger Response
2. Carter Committee Correspondence
3. Proposed Questions
4. Factual and Legal Analyses (2)
5. Proposed Letters

Staff Members: P. Reilly
J. Bernstein

9304353257 3

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Richard Klinger and George Unwin) MUR 2583

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 16, 1989, the Commission decided by a vote of 6-0 to take the following actions in MUR 2583:

1. Find reason to believe that Richard Klinger and George Unwin violated 2 U.S.C. § 441f.

2. Approve the letters, Factual and Legal Analyses and questions, as recommended in the General Counsel's report signed June 5, 1989.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

June 16, 1989
Date

Hilda Arnold
for Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Tues., 6-6-89, 2:28
Circulated on 48 hour tally basis: Tues., 6-6-89, 4:00
Deadline for vote: Fri., 6-16-89, 4:00

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 23, 1989

Richard Klinger
4446 Stern Avenue
Sherman Oaks, CA 91423

RE: MUR 2583
Richard Klinger

Dear Mr. Klinger:

On June 16, 1989, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The 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. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office, along with answers to the enclosed questions, within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

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Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 authorizing such counsel to receive any notifications and other communications from the Commission.

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 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 Patty Reilly the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Danny L. McDonald

Danny L. McDonald
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form
Questions

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Richard Klinger MUR 2583

Section 441f of Title 2, United States Code makes it unlawful for any person to make a contribution in the name of another or for any person to knowingly permit his or her name to be used for such purpose.

Various employees of Stuart Karl or his company, as well as other persons associated with Mr. Karl, made contributions to political committees at his request. Afterwards, those individuals were reimbursed in cash for the contribution made. Thus, by drafting a check to a political committee, the payer was the apparent contributor. However, by accepting reimbursement for such contribution, the payer has disguised the true origin of the contributed funds. Richard Klinger permitted his name to be used to make a contribution to Americans With Hart, Inc. which contribution was apparently reimbursed through corporate funds or the personal funds of Stuart Karl. Therefore, there is reason to believe Richard Klinger violated 2 U.S.C. § 441f.

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BEFORE THE FEDERAL ELECTION COMMISSION

MUR 2583
Questions To: Richard Klinger

1. Please state your name, address and current employment.

2. Please state whether you are now or ever have been been employed by Stuart Karl, or Karl Video Corporation, or Karl Home Video or Karl-Lorimar Home Video, Inc., or Lorimar Home Video, Inc. If yes,

   a. Please identify which employer(s).

   b. Please state all positions or titles you held, together with the period of time you occupied each position or had such title.

   c. Please describe your duties and responsibilities for each position or title you held.

3. Please state whether you made a contribution to or expenditure on behalf of:

   a. Gary W. Hart,
   b. Americans With Hart, Inc.,
   c. Friends of Gary Hart - 1988, Inc.,
   d. Kathleen Kennedy Townsend,
   e. Citizens For Townsend, Inc.,
   f. Dave Carter,
   g. Dave Carter for Congress,
   h. John Kerry,
   i. The Kerry Committee,
   j. Carol Ann Bradford,
   k. Carol Ann Bradford for Congress,
   l. Tim Wirth,
   m. Committee for Tim Wirth, Inc., or
   n. Any other federal candidate or committee from 1984 through 1988.

4. With respect to each contribution indicated in question 3, please state:

   a. The amount and date of such contribution.

   b. Whether your contribution was made as a result of a solicitation. If yes, state by whom and when the solicitation was made.

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c. Whether your contribution was made by check or other written instrument. If yes, please provide a copy (both sides) of such check or other written instrument. If there is no written instrument, please state the source of the funds used to make the contribution.

d. How you delivered this contribution and to whom.

e. Whether this contribution was for a particular fundraising event. If yes, please state when and where the event was held, who sponsored the event, and whether you attended.

f. Whether anyone offered to reimburse you for such contribution. If yes, please identify such person and describe in detail all circumstances involved.

g. Whether you received funds or other benefit from or reimbursement from any person, corporation or other entity for the purpose of making such contribution. If yes, please identify such person, corporation or other entity, and describe in detail all circumstances involved.

5. With respect to each expenditure indicated in question 3, please state:

a. The amount and date of such expenditure.

b. Whether anyone requested that you make such expenditure. If yes, please identify who made that request, when and the purpose of the expenditure.

c. Whether your expenditure was made by check or other written instrument. If yes, please provide a copy (both sides) of such check or other written instrument. If no written instrument was used, please state the source of the funds used to make the expenditure.

d. Whether this expenditure was for a particular fundraising event. If yes, please state when and where the event was held, who sponsored the event, and whether you attended.

e. Whether anyone offered to reimburse you for such expenditure. If yes, please identify such person and describe in detail all circumstances involved.

f. Whether you received funds or other benefit from or reimbursement from any person, corporation or other entity for the purpose of making such expenditure. If yes, please identify such person, corporation or other entity, and describe in detail all circumstances involved.

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6. Please state whether you know any other person or entity who made a contribution to or expenditure on behalf of any or all of the candidates or political committees listed in question 3 above. If yes,

a. Please identify each such person or entity and the recipient candidate or committee.

b. If you know, state whether such contribution or expenditure was made by written instrument or in cash.

c. If you know, state whether such persons were reimbursed by anyone for such contribution or expenditure. If so, identify by whom, when and the method of reimbursement.

d. Please explain in detail how you acquired this information.

e. Please describe the nature of your relationship to each person or entity identified in your response to this question.

7. To the best of your knowledge and belief, state whether any officials, employees or agents of:

a. Americans With Hart, Inc.,
b. Friends of Gary Hart-1988, Inc.,
c. Citizens for Townsend, Inc.
d. Dave Carter for Congress,
e. The Kerry Committee,
f. Carol Ann Bradford for Congress,
g. Committee for Tim Wirth, Inc., or
h. Any other federal political committee,

were aware that any contribution or expenditure to or on behalf of such federal candidate or committee had been reimbursed. If yes, please identify each such committee official, employee or agent, and state how your knowledge or belief was acquired.

8. Please state whether you worked on, planned, prepared, arranged, attended or otherwise participated in any fundraiser held for the benefit of any candidate or political committee referenced in question 7 above. If yes,

a. Please identify each fundraiser, including the sponsor, date and location.

b. State, to the best of your knowledge, the number of hours you worked on any such preparations or arrangements.

c. Of the hours listed, please state the number of hours worked during what would otherwise have been your regular work period during calendar years 1984 through 1988, inclusive.

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d. Please state your hourly wages or salary, whether you were expected as part of your duties and responsibilities on behalf of your employer(s) from 1984 through 1988, inclusive, to work a particular number of hours per pay period and what that number of hours was.

e. Please state whether you were authorized by Stuart Karl or your employer(s) from 1984 through 1988, inclusive,

(i) to work on such preparations or arrangements, or

(ii) to solicit contributions or attendance by employees.

If yes, please identify by whom you were so authorized and state the number of times and the manner in which you were authorized to conduct the solicitations. Identify all employees you solicited.

9. Please identify any person (other than counsel) who was counsulted or assisted in the preparation of answers to these questions.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 23, 1989

George Unwin
177F Riverside
Newport Beach, CA 92663

RE: MUR 2583
George Unwin

Dear Mr. Unwin:

On June 16, 1989, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The 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. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office, along with answers to the enclosed questions, within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

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Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 authorizing such counsel to receive any notifications and other communications from the Commission.

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 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 Patty Reilly the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Danny L. McDonald

Danny L. McDonald
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form
Questions

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: George Unwin MUR 2583

Section 441f of Title 2, United States Code makes it unlawful for any person to make a contribution in the name of another or for any person to knowingly permit his or her name to be used for such purpose.

Various employees of Stuart Karl or his company, as well as other persons associated with Mr. Karl, made contributions to political committees at his request. Afterwards, those individuals were reimbursed in cash for the contribution made. Thus, by drafting a check to a political committee, the payer was the apparent contributor. However, by accepting reimbursement for such contribution, the payer has disguised the true origin of the contributed funds. George Unwin permitted his name to be used to make contributions to Americans With Hart, Inc., the Dave Carter for Congress Committee and Citizens for Townsend, Inc., which contributions were apparently reimbursed through corporate funds or the personal funds of Stuart Karl. Therefore, there is reason to believe George Unwin violated 2 U.S.C. § 441f.

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BEFORE THE FEDERAL ELECTION COMMISSION

MUR 2583
Questions To: George Unwin

1. Please state your name, address and current employment.

2. Please state whether you are now or ever have been been employed by Stuart Karl, or Karl Video Corporation, or Karl Home Video or Karl-Lorimar Home Video, Inc., or Lorimar Home Video, Inc. If yes,

   a. Please identify which employer(s).

   b. Please state all positions or titles you held, together with the period of time you occupied each position or had such title.

   c. Please describe your duties and responsibilities for each position or title you held.

3. Please state whether you made a contribution to or expenditure on behalf of:

   a. Gary W. Hart,
   b. Americans With Hart, Inc.,
   c. Friends of Gary Hart - 1988, Inc.,
   d. Kathleen Kennedy Townsend,
   e. Citizens For Townsend, Inc.,
   f. Dave Carter,
   g. Dave Carter for Congress,
   h. John Kerry,
   i. The Kerry Committee,
   j. Carol Ann Bradford,
   k. Carol Ann Bradford for Congress,
   l. Tim Wirth,
   m. Committee for Tim Wirth, Inc., or
   n. Any other federal candidate or committee from 1984 through 1988.

4. With respect to each contribution indicated in question 3, please state:

   a. The amount and date of such contribution.

   b. Whether your contribution was made as a result of a solicitation. If yes, state by whom and when the solicitation was made.

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c. Whether your contribution was made by check or other written instrument. If yes, please provide a copy (both sides) of such check or other written instrument. If there is no written instrument, please state the source of the funds used to make the contribution.

d. How you delivered this contribution and to whom.

e. Whether this contribution was for a particular fundraising event. If yes, please state when and where the event was held, who sponsored the event, and whether you attended.

f. Whether anyone offered to reimburse you for such contribution. If yes, please identify such person and describe in detail all circumstances involved.

g. Whether you received funds or other benefit from or reimbursement from any person, corporation or other entity for the purpose of making such contribution. If yes, please identify such person, corporation or other entity, and describe in detail all circumstances involved.

5. With respect to each expenditure indicated in question 3, please state:

a. The amount and date of such expenditure.

b. Whether anyone requested that you make such expenditure. If yes, please identify who made that request, when and the purpose of the expenditure.

c. Whether your expenditure was made by check or other written instrument. If yes, please provide a copy (both sides) of such check or other written instrument. If no written instrument was used, please state the source of the funds used to make the expenditure.

d. Whether this expenditure was for a particular fundraising event. If yes, please state when and where the event was held, who sponsored the event, and whether you attended.

e. Whether anyone offered to reimburse you for such expenditure. If yes, please identify such person and describe in detail all circumstances involved.

f. Whether you received funds or other benefit from or reimbursement from any person, corporation or other entity for the purpose of making such expenditure. If yes, please identify such person, corporation or other entity, and describe in detail all circumstances involved.

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6. Please state whether you know any other person or entity who made a contribution to or expenditure on behalf of any or all of the candidates or political committees listed in question 3 above. If yes,

a. Please identify each such person or entity and the recipient candidate or committee.

b. If you know, state whether such contribution or expenditure was made by written instrument or in cash.

c. If you know, state whether such persons were reimbursed by anyone for such contribution or expenditure. If so, identify by whom, when and the method of reimbursement.

d. Please explain in detail how you acquired this information.

e. Please describe the nature of your relationship to each person or entity identified in your response to this question.

7. To the best of your knowledge and belief, state whether any officials, employees or agents of:

a. Americans With Hart, Inc.,
b. Friends of Gary Hart-1988, Inc.,
c. Citizens for Townsend, Inc.
d. Dave Carter for Congress,
e. The Kerry Committee,
f. Carol Ann Bradford for Congress,
g. Committee for Tim Wirth, Inc., or
h. Any other federal political committee,

were aware that any contribution or expenditure to or on behalf of such federal candidate or committee had been reimbursed. If yes, please identify each such committee official, employee or agent, and state how your knowledge or belief was acquired.

8. Please state whether you worked on, planned, prepared, arranged, attended or otherwise participated in any fundraiser held for the benefit of any candidate or political committee referenced in question 7 above. If yes,

a. Please identify each fundraiser, including the sponsor, date and location.

b. State, to the best of your knowledge, the number of hours you worked on any such preparations or arrangements.

c. Of the hours listed, please state the number of hours worked during what would otherwise have been your regular work period during calendar years 1984 through 1988, inclusive.

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d. Please state your hourly wages or salary, whether you were expected as part of your duties and responsibilities on behalf of your employer(s) from 1984 through 1988, inclusive, to work a particular number of hours per pay period and what that number of hours was.

e. Please state whether you were authorized by Stuart Karl or your employer(s) from 1984 through 1988, inclusive,

(i) to work on such preparations or arrangements, or

(ii) to solicit contributions or attendance by employees.

If yes, please identify by whom you were so authorized and state the number of times and the manner in which you were authorized to conduct the solicitations. Identify all employees you solicited.

9. Please identify any person (other than counsel) who was counsulted or assisted in the preparation of answers to these questions.

9304353258 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Donald R. Wager, Esquire
Suite 1000
10920 Wilshire Boulevard
Los Angeles, CA 90024

RE: MUR 2583
Harold Weitzberg

Dear Mr. Wager:

Pursuant to your June 9, 1989, telephone conversation with Patty Reilly of this Office, enclosed please find the questions previously issued to your client by the Commission.

Please have Mr. Weitzberg respond to these questions. The response must be returned within fifteen days. Additionally, as indicated in your previous letter, pre-probable cause conciliation may be requested if your client desires.

If you have any questions, please contact Patty Reilly, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

2 3 0 4 3 5 3 2 5 8 9

RECEIVED
FEDERAL ELECTION COMMISSION
89 JUN -9 PM 3:33

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Robert Bonham) MUR 2583
)

SENSITIVE
EXECUTIVE SESSION
JUN 27 1989

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On March 1, 1988, the Commission found reason to believe certain individuals had made political contributions that were subsequently reimbursed by their employer, Stuart Karl or Karl Home Video, Inc. ("KHV"). Based upon information uncovered during the course of the investigation, on June 14, 1988, the Commission determined that Robert Bonham, along with numerous other individuals, violated 2 U.S.C. § 441f.

Recently, it has come to the attention of this Office that a request for pre-probable cause conciliation made by Robert Bonham in November 1988 was inadvertently not presented to the Commission. A second request for pre-probable cause conciliation was submitted on April 11, 1989. As discussed below, this Office recommends that the Commission deny this request for conciliation at this time.

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II. ANALYSIS OF THE REQUEST

In response to the Commission's questions, Mr. Bonham admits making contributions to federal candidates, but denies being reimbursed for such contributions. Additionally, in the deposition of Mr. Karl's secretary, Rama L. Middel, Ms. Middel does not recall reimbursing Mr. Bonham for his political contributions. Therefore, due to the lack of evidence supporting

a violation, it appears that there is not an appropriate basis for conciliation. Accordingly, in the absence of further probative evidence regarding Mr. Bonham, this Office will proceed to the next stage of the enforcement process.

III. **RECOMMENDATIONS**

1. Deny the request for pre-probable cause conciliation of Robert Bonham at this time.

2. Approve the attached letter.

6/6/89
Date

By: LM Noble (ZJZ)
Lawrence M. Noble
General Counsel

Staff Assigned: Patty Reilly

Attachments
Conciliation Requests
Proposed Letter

9304353259 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS

DATE: JUNE 16, 1989

SUBJECT: OBJECTION TO MUR 2583 (Robert Bonham)
Signed June 6, 1989.

9304353259 2

The above-captioned document was circulated to the Commission on Monday, June 12, 1989 at 4:00 p.m.

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

Commissioner Aikens _____

Commissioner Elliott XX

Commissioner Josefiak _____

Commissioner McDonald _____

Commissioner McGarry _____

Commissioner Thomas _____

This matter will be placed on the Executive Session agenda for Tuesday, June 27, 1989

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Robert Bonham)

MUR 2583

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of June 27, 1989, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2583:

1. Deny the request for pre-probable cause conciliation of Robert Bonham at this time.

2. Approve the letter attached to the General Counsel's report dated June 6, 1989, subject to amendment as agreed during the meeting discussion.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

6-29-89
Date

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

9304353259293

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 7, 1989

Jerry Nicholson, Esquire
Law Office of Jerry Nicholson
5375 East Second Street
Suite One
Long Beach, CA 90803

RE: MUR 2583
Robert Bonham

Dear Mr. Nicholson:

On June 20, 1988, you were notified that the Federal Election Commission found reason to believe that your client, Robert Bonham, violated 2 U.S.C. § 441f. On November 28, 1988 and April 11, 1989 you submitted requests to enter into conciliation negotiations prior to a finding of probable cause to believe. The Commission has reviewed these requests and has declined to enter into pre-probable cause conciliation at this time. The Commission is not prepared to enter into conciliation prior to a finding of probable cause to believe, and has not determined that a conciliation agreement will be necessary to conclude this matter as it pertains to your client. Accordingly, this Office will proceed to the next stage of the enforcement process.

If you have any questions please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

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OGC 3357

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE SERVICES BRANCH

89 JUL 10 AM 11:32

DONALD R. WAGER
ATTORNEY AT LAW
SUITE 1000
10920 WILSHIRE BLVD.
LOS ANGELES, CA 90024

(213) 553-8252

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
89 JUL 10 PM 3:01

July 6, 1989

Ms. Patty Reilly
Federal Election Commission
Washington, D.C. 30463

Re: MUR 2583
Harold Weitzberg

Dear Patty:

Pursuant to our conversation of this morning, enclosed please find Mr. Weitzberg's answers in the above matter.

As we agreed, I will forward a copy of these answers to Mr. Weitzberg to sign and swear to and will then mail the completed copy to you.

Thank you very much for your help and patience in this matter.

Sincerely yours,

Lore Leis

Lore Leis
Secretary to
Donald R. Wager

/ls

Enclosure

9304355325925

Responses to Federal Election Commission

1) Harold Clyde Weitzberg
2065 Flamingo Drive
Costa Mesa, CA 92626

Self Employed
President / CHILD'S PLAY VIDEO

2) Karl Video Corporation /Karl Home Video

7/83-10/83 Consultant
Six days per month
Evaluated Distribution, sales, merchandising problems and recommended solutions.

10/83-10/84 National Sales Director
Managed Sales Staff
Developed Sales Programs
Created and monitored Sales Projections
Travel for sales for self and staff
Developed Marketing/Sales/Corporate Strategy with other executives.

Karl/Lorimar Home Video

10//84-6/85 Executive Vice President Of Sales
Same duties as above on larger level.
Created and implemented organizational expansion plan for department.
Participated in executive committee.
Interfaced with licensors, Lorimar staff, and client base.
Company participant in law suit with Video Associates.

6/85-11/85 Executive Vice President of Sales and Marketing.
Added duties of supervising marketing staff and developing and implementing marketing plans.

11/85-2/86 Executive Vice President
Responsible for Special Projects and operations of product manufacturing.

3) Contribution to:
Friend of Gary Hart
Bradford for Congress
Cranston for President

4) Friends of Gary Hart
a) $1000 (one thousand dollars) 2/3/84
b) Contribution was solicited by Mr. Stuart Karl, January 1984.
c) By personal check

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d) Handed to Mr. Karl
e) No
f)
g)

Bradford for Congress
a) $500 (five hundred dollars) 11/6/84
b) Solicitation by Mr. Stuart Karl, November 1984
c) By personal check
d) Mr. Karl or his secretary
e) No
f)
g)

Cranston for President
a) $500 (five hundred dollars) 10/12/84
b) Solicitation by Mr. Stuart Karl, Sept/Oct. 1984
c) By personal check
d) Mr. Karl or his secretary
e) Following a talk by the Mr. Cranston at the Pacific Club in Irvine in Sept/Oct. 1984, sponsored by Mr. Karl.
f)
g)

4F) Mr. Karl did make an offer to reimburse me for contributions. I informed him it was not necessary. If he felt he wanted to do me a favor, my wife had an antique jewelry business. If he was considering buying any jewelry, I would appreciate him looking at my wife's inventory first. He did in fact make a number of purchases over the next few months. These were made at retail value of the pieces comparable to the price anyone would have been sold the pieces.

5) No

6) 1) My wife made a contribution to the Hart Campaign for $1000.
2) I understand other employees in Karl Video made contributions to various campaigns.

7) To the best of my knowledge I am not sure if any of the individuals outlined in this question had knowledge of any reimbursement.

8) Attended
a) Mondale Dinner
California Democrat dinner
I do not recall specifics

b) None
c) none
d) 1984-$100,000

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1985-$125,000
1986-$135,000
No requirements

e) No

9) No one.

I swear under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

DATED: 7/12/89

HAROLD C. WEITZBERG

9304335325998

Richard D. Klinger
4446 Stern Avenue
Sherman Oaks, CA.
91423

Telephone: 818-789-8499

July 18, 1989

Patty Reilly, Esq.
Federal Election Commission
Washington, D.C. 20463

RE: MUR 2583
Richard Klinger

Dear Ms. Reilly:

Pursuant to your letter to me of June 23, 1989 and your subsequent conversation with Daivd M. Satz, Jr., my counsel, I am submitting herewith answers to the questions addressed to me by the Commission.

1. My name is: Richard D. Klinger
Address: 4446 Stern Avenue, Sherman Oaks, CA. 91423
Employment: Producer for and marketing consultant to the home video business.

2. I was employed through an indepentdent production contract with RDK Prodcutions, Inc. by Karl-Lorimar Home Video, Inc. from September, 1986 through August, 1987. I was responsible for producing programs for Karl-Lorimar Home Video. My title was Producer.

3. I made a contribution to Friends of Gary Hart.

4. a. I made one single contribution in the amount of $250. on January 30, 1984.

b. The contribution was made as the result of a solicitation made by Stuart Karl earlier in January, 1984.

c. The contribution was made by check.

d. To the best of my recollection, the check was mailed directly to the Friends of Gary Hart organization.

e. I do not know if the contribution was for a particular fundraising event.

f. While no one directly offered reimbursement for the contribution, Stuart Karl told me to make the contribution and that my wife and I would benefit from it. At that time I was managing the singing and writing career of my wife, who was under a recording contract with Karl Record Corp. At the time I thought that the statement related to my wife's future recording status with Mr. Karl, and that we would be able to obtain more recording opportunities for her.

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g. To the best of my recollection, I subsequently did receive reimbursement in the form of a check, but I don't recall the amount; see answer to #6(c). I don't remember whether the check came from Karl Video Corporation or from Stuart Karl.

5. Other than the contribution described in #4, above, I made no expenditures pursuant to #3, above.

6. a. My wife, Janis Klinger, was also asked to make a contribution to Friends of Gary Hart.

b. The contribution was made by check in the amount of $250.

c. I believe that we were reimbursed, but I don't recall now where, when. I think the reimbursement was made by check.

d. I know that Janis Klinger also made a contribution because Stuart Karl had solicited me to have both of us do so.

e. Janis Klinger is my wife, and was then my management client.

7. I have no knowledge or reason to believe that any officials, employees or agents of any of those listed in the question were aware that any contribution or expenditure to or on behalf of such federal candidate or committee was reimbursed.

8. I did not work on, plan, prepare, arrange, attend or otherwise participate in any fundraiser held for the benefit of any candidate or political committee referenced in question 7.

9. No other person other than myself and my counsel assisted in the preparation of these answers.

I request pursuing the pre-probable cause conciliation process and believe that this is the most appropriate way to dispose of this matter. I trust that the information provided herein is sufficient for you to proceed. If you have any further questions, please contact me directly or through Mr. Satz.

Thank you.

RICHARD D. KLINGER

cc: David M. Satz, Jr., Esq.

9304353260 0

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

89 AUG -2 AM 11:22

THE FEDERAL ELECTION COMMISSION

In the Matter of

SENSITIVE

Janice Benlein	)	MUR 2583
Catherine W. Bramnick	)	
John J. Lutgens	)	
Karen Stewart	)	

GENERAL COUNSEL'S REPORT

I. **BACKGROUND**

Attached for Commission approval are four conciliation agreements signed by counsel for the four respondents in the above-captioned matter. The attached agreements do not contain any changes from the agreements approved by the Commission on June 28, 1989. Respondents have also provided the Commission with a check for the total amount of the civil penalty.

II. **RECOMMENDATIONS**

1. Accept the attached conciliation agreements with Janice Benlein, Catherine W. Bramnick, John J. Lutgens, and Karen Stewart.

2. Close the file as to these respondents.

3. Approve the attached letters.

8/1/87
Date

Lawrence M. Noble
General Counsel

Attachments
1. Conciliation Agreements
2. Photocopy of civil penalty check
3. Letter to Respondents

Staff Assigned: Patty Reilly

2304353260 01

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 2583
Janice Benlein	)	
Catherine W. Bramnick	)	
John J. Lutgens	)	
Karen Stewart	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 4, 1989, the Commission decided by a vote of 5-1 to take the following actions in MUR 2583:

1. Accept the conciliation agreements with Janice Benlein, Catherine W. Bramnick, John J. Lutgens, and Karen Stewart as recommended in the General Counsel's Report dated August 1, 1989.

2. Close the file as to these respondents.

3. Approve the letter as recommended in the General Counsel's Report dated August 1, 1989.

Commissioners Aikens, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision. Commissioner Elliott dissented.

Attest:

8-4-89
Date

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

Received in the Secretariat at 11:22 a.m. on August 2, 1989.
Circulated to the Commission at 4:00 p.m. on August 2, 1989.
Deadline for vote: August 4, 1989, at 4:00 p.m.

9304353260 02

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 10, 1989

John D. Vandevelde, Esquire
Talcott, Lightfoot, Vandevelde,
Woehrle & Sadowsky
655 South Hope St.
Los Angeles, CA 90017

RE: MUR 2583
Janice Benlein
Catherine W. Bramnick
John J. Lutgens
Karen Stewart

Dear Mr. Vandevelde:

On August 4, 1989, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your clients' behalf in settlement of violations of 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to your clients. This matter will become a part of the public record within 30 days after it has been closed with respect to all other respondents involved. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

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.

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Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreements

9304353260 4

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Janice Benlein	)	MUR 2583

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (the "Commission") pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Janice Benlein (the "Respondent") violated 2 U.S.C. § 441f.

NOW, THEREFORE, the Commission and the Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent 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. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

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

1. Respondent is a former employee of Karl-Lorimar Home Video, Inc., a company organized under the laws of California. Stuart Karl was the president of Karl-Lorimar Home Video, Inc.

2. Respondent was asked by Mr. Karl, or at his direction, to make a contribution by writing a check for $500.00 to Dave Carter for Congress.

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3. Respondent made the solicited contribution and thereafter accepted reimbursement by check for that contribution from Mr. Karl.

V. 1. Respondent allowed her name to be used to effect contributions by Mr. Karl in violation of 2 U.S.C. § 441f.

2. Respondent contends said violation was not knowing and willful.

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of One Hundred and Eighty Dollars ($180.00) 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.

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

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

9304353260 6

oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

8/10/87
Date

FOR THE RESPONDENT:

Janice W. Benlein
By John D. Vandevelde
TALCOTT, LIGHTFOOT, VANDEVELDE
WOEHRLE & SADOWSKY
Attorneys for Respondent

July 7, 1989
Date

9304353260 7

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Catherine W. Bramnick	)	MUR 2583

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (the "Commission") pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Catherine W. Bramnick (the "Respondent") violated 2 U.S.C. § 441f.

NOW, THEREFORE, the Commission and the Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent 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. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

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

1. Respondent is a former employee of Karl-Lorimar Home Video, Inc., a company organized under the laws of California. Stuart Karl was the president of Karl-Lorimar Home Video, Inc.

2. Respondent was asked by Mr. Karl, or at his direction, to make a contribution by writing checks for $250.00 to Americans With Hart, Inc. and for $1,000.00 to Dave Carter for Congress.

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3. Respondent made the solicited contributions and thereafter accepted reimbursement in cash for these contributions from Mr. Karl.

V. 1. Respondent allowed her name to be used to effect contributions by Mr. Karl in violation of 2 U.S.C. § 441f.

2. Respondent contends said violation was not knowing and willful.

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of Four Hundred and Seventy Dollars ($470) 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.

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

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

9304353260 9

oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

8/10/89

Lawrence M. Noble
General Counsel

Date

FOR THE RESPONDENT:

July 7, 1989

Catherine W. Bramnick
By John D. Vandevelde
TALCOTT, LIGHTFOOT, VANDEVELDE
WOEHRLE & SADOWSKY
Attorneys for Respondent

Date

9304353261O

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
John J. Lutgens	)	MUR 2583

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (the "Commission") pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that John J. Lutgens (the "Respondent") violated 2 U.S.C. § 441f.

NOW, THEREFORE, the Commission and the Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent 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. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

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

1. Respondent is a former employee of Karl-Lorimar Home Video, Inc., a company organized under the laws of California. Stuart Karl was the president of Karl-Lorimar Home Video, Inc.

2. Respondent was asked by Mr. Karl, or at his direction, to make contributions by writing checks for $2,000.00 to Dave Carter for Congress, and $1,000.00 to The Kerry Committee.

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3. Respondent made the solicited contributions and thereafter accepted reimbursement in cash for those contributions from Mr. Karl.

V. 1. Respondent allowed his name to be used to effect contributions by Mr. Karl in violation of 2 U.S.C. § 441f.

2. Respondent contends said violation was not knowing and willful.

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of One Thousand, One Hundred and Twenty-five Dollars ($1,125) 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.

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

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and

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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 enforceable.

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

Date 9/10/89

FOR THE RESPONDENT:

John J. Lutgens
John D. Vandevelde
TALCOTT, LIGHTFOOT, VANDEVELDE
WOEHRLE & SADOWSKY
Attorneys for Respondent

July 7, 1989
Date

2304353261 3

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Karen Stewart	)	MUR 2583

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (the "Commission") pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Karen Stewart (the "Respondent") violated 2 U.S.C. § 441f.

NOW, THEREFORE, the Commission and the Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent 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. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

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

1. Respondent is a former employee of Karl-Lorimar Home Video, Inc., a company organized under the laws of California. Stuart Karl was the president of Karl-Lorimar Home Video, Inc.

2. Respondent was asked by Mr. Karl, or at his direction, to make a contribution by writing a check for $200.00 to The Kerry Committee.

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3. Respondent made the solicited contribution and thereafter accepted reimbursement in cash for that contribution from Mr. Karl.

V. 1. Respondent allowed her name to be used to effect contributions by Mr. Karl in violation of 2 U.S.C. § 441f.

2. Respondent contends said violation was not knowing and willful.

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of Seventy-five Dollars ($75.00) 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.

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

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

2304353261 5

oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

8/10/87
Date

FOR THE RESPONDENT:

Karen Stewart
By John D. Vandevelde
TALCOTT, LIGHTFOOT, VANDEVELDE
WOEHRLE & SADOWSKY
Attorneys for Respondent

July 7, 1989
Date

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RECEIVED
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SECRETARIAT

89 AUG 14 PM 3:59

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2583
Richard Klinger)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On June 16, 1989, the Commission found reason to believe Richard Klinger violated 2 U.S.C.§441f. Underlying the Commission's determination was evidence that respondent made a contribution to the Friends of Gary Hart and was subsequently reimbursed for this contribution by Stuart Karl. Also on that date the Commission approved questions for Mr. Klinger.

Following discussions with counsel, on July 26, 1989, respondent submitted a response stating that he had made a $250 contribution to the Friends of Gary Hart. Mr. Klinger states he believes he was reimbursed for this contribution, but does not recall the amount he was reimbursed. Respondent also requests pre-probable cause conciliation. As discussed below, this Office recommends that the Commission grant this request.

II. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

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III. **RECOMMENDATIONS**

1. Enter into conciliation with Richard Klinger prior to a finding of probable cause to believe.

2. Approve the attached proposed conciliation agreement and letter.

8/17/89
Date

Lawrence M. Noble
General Counsel

Attachments
1. Request for conciliation
2. Proposed Conciliation Agreement and letter

Staff assigned: Patty Reilly

2304353261618

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Richard Klinger) MUR 2583

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 17, 1989, the Commission decided by a vote of 5-1 to take the following actions in MUR 2583:

1. Enter into conciliation with Richard Klinger prior to a finding of probable cause to believe, as recommended in the General Counsel's Report to the Commission dated August 14, 1989.

2. Approve the proposed conciliation agreement and letter, as recommended in the General Counsel's Report to the Commission dated August 14, 1989.

Commissioners Aikens, Josefiak, McDonald, McGarry and Thomas voted affirmatively for the decision; Commissioner Elliott dissented.

Attest:

8-18-89
Date

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

Received in the Secretariat: Monday, August 14, 1989 at 3:59 p.m.
Circulated to the Commission: Tuesday, August 15, 1989 at 4:00 p.m.
Deadline for vote: Thursday, August 17, 1989 at 4:00 p.m.

cmj

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 24, 1989

David M. Satz, JR., Esquire
Saiber, Schlesinger, Satz & Goldstein
One Gateway Center
Newark, N.J. 07102-5311

RE: MUR 2583
Richard Klinger

Dear Mr. Satz:

On June 16, 1989, the Federal Election Commission found reason to believe that your client, Richard Klinger, violated 2 U.S.C. § 441f. At your request, on August 17, 1989, the Commission determined 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 is a conciliation agreement that the Commission has approved in settlement of this matter. If your client agrees with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, 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.

The Commission also acknowledges receipt of your client's check for a proposed civil penalty. This payment, however, is premature in that the parties have not yet negotiated a mutually satisfactory conciliation agreement. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with an agreement, please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

9304353262620

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

89 OCT -4 AM 9:28

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)
) MUR 2583
Richard Klinger)

GENERAL COUNSEL'S REPORT

I. **BACKGROUND**

Attached is a conciliation agreement signed by Richard Klinger.

The attached agreement contains no changes from the agreement approved by the Commission on August 18, 1989. A check for the civil penalty accompanied the agreement.[1]

II. **RECOMMENDATIONS**

1. Accept the attached conciliation agreement with Richard Klinger.

2. Close the file as to this respondent.

3. Approve the attached letter.

10/4/89
Date

Lawrence M. Noble
General Counsel

Attachments
1. Conciliation Agreement
2. Photocopy of civil penalty check
3. Letter to Respondent

Staff Assigned: Patty Reilly

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1. Respondent submitted a check for $75 with his request for pre-probable cause conciliation. Most recently he submitted a check for $55, representing the balance due on the $125 civil penalty.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2583
Richard Klinger)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 6, 1989, the Commission decided by a vote of 5-0 to take the following actions in MUR 2583:

1. Accept the conciliation agreement with Richard Klinger, as recommended in the General Counsel's Report dated October 4, 1989.

2. Close the file as to this respondent.

3. Approve the letter, as recommended in the General Counsel's Report dated October 4, 1989.

Commissioners Aikens, Elliott, Josefiak, McGarry and Thomas voted affirmatively for the decision; Commissioner McDonald did not cast a vote.

Attest:

Oct. 3, 1989
Date

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

Received in the Secretariat: Wednesday, October 4, 1989 9:28 a.m.
Circulated to the Commission: Wednesday, October 4, 1989 11:00 a.m.
Deadline for vote: Friday, October 6, 1989 11:00 a.m.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 11, 1989

David M. Satz, JR., Esquire
Saiber, Schlesinger, Satz & Goldstein
One Gateway Center
Newark, N.J. 07102-5311

RE: MUR 2583
Richard Klinger

Dear Mr. Satz:

On October 6, 1989, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your client's behalf in settlement of a violation of 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to your client. This matter will become a part of the public record within 30 days after it has been closed with respect to all other respondents involved. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

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 copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2583
Richard Klinger)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Richard Klinger ("Respondent") violated 2 U.S.C.§ 441f.

NOW, THEREFORE, the Commission and the Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent 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. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

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

1. Respondent Richard Klinger's spouse, Janice Klinger, is a former employee of Karl-Lorimar Home Video, Inc., a company organized under the laws of the state of California. Stuart Karl was the president of Karl-Lorimar Home Video, Inc.

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2. Respondent was asked by Mr. Karl, or at his direction, to make a contribution by writing a check for $250 to Americans with Hart, Inc.

4. Respondent made the solicited contribution and thereafter was reimbursed for that contribution by Mr. Karl.

V. Respondent allowed his name to be used to effect a contribution by Mr. Karl in violation of 2 U.S.C. § 441f.

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of one hundred and twenty-five dollar ($125), 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 have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

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,

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made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

Oct 11, 1989
Date

FOR THE RESPONDENT

Richard Klinger

Sept. 5, 1989
Date

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Stuart Karl) MUR 2583

SENSITIVE
EXECUTIVE SESSION
OCT 24 1989

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On March 1, 1988, the Commission found reason to believe Stuart Karl knowingly and willfully violated 2 U.S.C. §§ 441a(a)(1)(A), 441a(a)(3), 441b(a) and 441f. Also on that date the Commission approved a subpoena for documents and for respondent's deposition.

On April 8, 1988, respondent's counsel filed a motion to quash this subpoena. The Commission denied this motion on April 12, 1988, and when respondents failed to produce these documents, on May 17, 1988, the Commission authorized the Office of the General Counsel to file civil suit to enforce this subpoena.

Subsequently, on June 9, 1988, Mr. Karl was indicted by a Los Angeles federal grand jury. Because the indictment lent credence to Mr. Karl's claim of Fifth Amendment privilege, at the June 14, 1988 executive meeting, the Commission determined that it was inappropriate to file suit against Mr. Karl at that time. Subsequently, pursuant to a plea arrangement, Mr. Karl entered a guilty plea to two counts of a twelve count indictment. At his December 1988 sentencing he received a $60,000 fine and three years probation.

In light of the resolution of Mr. Karl's criminal case, on January 18, 1989, this Office requested documents responsive to

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its subpoena from the Assistant United States Attorney in Santa Ana, California. These documents were copied by the Federal Bureau of Investigation. Copies were provided to Mr. Karl's counsel on May 16, 1989, in order that they could be produced to the Commission.

On May 31, 1989, staff from this Office met with respondent's counsel regarding the scope of the Commission's subpoena.

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It does not appear that voluntary compliance with this subpoena will be forthcoming. Although the Commission has

previously authorized civil suit to enforce this subpoena, given the length of time that has elapsed, new Commission authorization for such civil suit appears to be appropriate. Therefore, this Office recommends that the Commission authorize civil suit to enforce Mr. Karl's subpoena. The attached letter explains the Commission's actions and states that if Mr. Karl should comply with the subpoena and wish to conciliate, all mitigating circumstances will be considered.

III. RECOMMENDATIONS

1. Determine not to enter into pre-probable conciliation with Stuart Karl prior to satisfaction of the Commission's outstanding subpoena.

2. Authorize the Office of the General Counsel to file civil suit in the United States District court against Stuart Karl.

3. Approve the attached letter.

10/11/89
Date

Lawrence M. Noble
General Counsel

Attachment
1. Doctor's Letter
2. Bankruptcy Pleadings
3. Proposed Letter

Staff Assigned: Patty Reilly

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Stuart Karl) MUR 2583

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of October 24, 1989, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 2583:

1. Determine not to enter into pre-probable conciliation with Stuart Karl prior to satisfaction of the Commission's outstanding subpoena.

2. Authorize the Office of the General Counsel to file civil suit in the United States District court against Stuart Karl.

3. Approve the letter attached to the General Counsel's report dated October 11, 1989.

Commissioners Aikens, Elliott, Josefiak, McGarry, and Thomas voted affirmatively for the decision; Commissioner McDonald was not present.

Attest:

10-25-89
Date

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

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

October 31, 1989

Peter J. Kahn, Esquire
Williams & Connolly
839 Seventeenth Street, N.W.
Washington, D.C. 20006

RE: MUR 2583
Stuart Karl

Dear Mr. Kahn:

On March 1, 1988, your client was notified that the Federal Election Commission found reason to believe Stuart Karl knowingly and willfully violated 2 U.S.C. §§ 441a(a)(1)(A), 441a(a)(3), 441b(a) and 441f. On June 30, 1989, you submitted a request to enter into conciliation negotiations prior to a finding of probable cause to believe, which the Commission denied on August 15, 1989.

Based upon your submissions of June 30, August 25, and August 30, 1989 on behalf of your client, on October 24, 1989, the Commission determined not to enter into pre-probable cause conciliation with your client prior to satisfaction of the outstanding subpoena addressed to him. If your client seeks conciliation upon full compliance with the subpoena, the Commission will of course consider all mitigating circumstances set forth on his behalf.

As a result of Mr. Karl's failure thus far to comply with the Commission's subpoena, the Commission also authorized the General Counsel to institute a civil action for subpoena enforcement in the United States District Court.

Should you have any questions, or should you wish to settle this matter prior to suit, please contact Jonathan Bernstein, Assistant General Counsel, at (202) 376-8200, within five days of your receipt of this letter.

Sincerely,

Lawrence M. Noble
General Counsel

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RECEIVED
FEDERAL ELECTION COMMISSION
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90 MAR 13 PM 4:23

BEFORE THE FEDERAL ELECTION COMMISSION **SENSITIVE**

In the Matter of)
)
Stuart Karl) MUR 2583

COMPREHENSIVE INVESTIGATIVE REPORT #2

On March 1, 1988, the Commission found reason to believe Stuart Karl knowingly and willfully violated 2 U.S.C. §§ 441a(a)(1)(A), 441a(a)(3), 441b(a) and 441f. Also on that date the Commission approved a subpoena for documents and for respondent's deposition.

On April 8, 1988, respondent's counsel filed a motion to quash this subpoena. The Commission denied this motion on April 12, 1988, and when respondents failed to produce these documents, on May 17, 1988, the Commission authorized the Office of the General Counsel to file civil suit to enforce this subpoena.

Subsequently, on June 9, 1988, Mr. Karl was indicted by a Los Angeles federal grand jury. Because the indictment lent credence to Mr. Karl's claim of Fifth Amendment privilege, at the June 14, 1988 executive meeting, the Commission determined that it was inappropriate to file suit against Mr. Karl at that time. Subsequently, pursuant to a plea arrangement, Mr. Karl entered a guilty plea to two counts of a twelve count indictment. At his December 1988 sentencing he received a $60,000 fine and three years probation.

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In light of the resolution of Mr. Karl's criminal case, on January 18, 1989, this Office requested documents responsive to its subpoena from the Assistant United States Attorney in Santa Ana, California. These documents were copied by the Federal Bureau of Investigation. Copies were provided to Mr. Karl's counsel on May 16, 1989, in order that they could be produced to the Commission.

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the Commission authorized this Office to file civil suit to enforce this subpoena. On January 2, 1990, this Office mailed subpoena enforcement papers to the California district court. These papers were lodged by the court on January 25, 1990; to date a show cause order has not been issued.

In addition to the subpoena enforcement action, this Office has also communicated with the Department of Justice ("DOJ") regarding the criminal investigation of Mr. Karl. DOJ has informed this Office that it has concluded the criminal investigation. Consequently, pursuant to the Memorandum of Understanding between the Commission and DOJ, we are seeking the investigatory product of this criminal investigation. At the time that the show cause order is granted or the requested materials are provided, this Office will report to the Commission.

3/13/90
Date

Lawrence M. Noble
General Counsel

Staff Assigned: Patty Reilly

9304353263 35

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

TO: LAWRENCE M. NOBLE, GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/DELORES HARRIS
SECRETARY OF THE COMMISSION

DATE: MARCH 15, 1990

SUBJECT: MUR 2583 - COMPREHENSIVE INVESTIGATIVE REPORT #2
GENERAL COUNSEL'S REPORT DATED MARCH 13, 1990.

The above-captioned matter was received in the Commission Secretariat at 4:23 p.m. on Tues., March 13, 1990 and circulated on a 24-hour no-objection basis at 11:00 a.m. on Wednesday, March 14, 1990.

There were no objections to the above-captioned matter.

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SECRETARIAT

90 APR 24 AM 11:09

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Americans With Hart, Inc. and)
Bernard E. Schneider, as treasurer)
Friends of Gary Hart-1988, Inc. and)
Stephen D. Alfers, as treasurer)
Gary W. Hart)

MUR 2583

SENSITIVE

GENERAL COUNSEL'S REPORT

I. **BACKGROUND**

On March 1, 1988, the Commission found reason to believe Americans With Hart, Inc. and its treasurer ("AWH" or "1984 Committee") violated 2 U.S.C. §§ 434(b), 441a(f), 441b(a), and 441f. Also on that date the Commission found reason to believe Friends of Gary Hart-1988, Inc. and Stephen D. Alfers, as treasurer, ("FGW" or "1988 Committee") also violated 2 U.S.C. §§ 434(b), 441a(f), 441b(a) and 441f. Moreover, the Commission further determined that Gary W. Hart violated 2 U.S.C. §§ 441(f) and 441b(a). The Commission also approved subpoenas for depositions and production of documents.

At respondents' request, the Commission granted the two Committees extensions of time to produce documents until April 18, 1988. Mr. Hart was granted an extension of time until April 13, 1988. Subsequently, respondents submitted additional requests for extension of time which the Commission denied on April 19, 1988. The Commission further authorized the Office of the General Counsel to bring subpoena enforcement actions in the event respondents failed to comply with these subpoenas within ten days.

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On April 28, 1988, counsel represented to this Office that a partial response would be soon provided. Responsive documents were submitted on May 6, May 19, June 6, June 10, and June 15, 1988. Senator Hart was deposed on July 15, 1988.

II. MATERIALS PRODUCED TO DATE

At this juncture, this Office believes two specific types of documents are necessary to this investigation. First, in conversations with counsel, references were made to a index or list indicating the contents of boxes in the possession of the 84 and 88 Committees. The Committees allegedly prepared this list in response to the Commission's subpoena in this matter. On numerous occasions this Office referenced this list and requested a copy of it. Although counsel initially agreed to provide the list, subsequently he stated that "no such index was in fact prepared by the Committee." (Attachment 1). This Office's further requests for a copy of the list have gone unheeded. (Attachment 2). Because respondents initially stated such a list was compiled, this Office believes it to exist in some form and further believes it would be helpful to our review of materials produced by the Committees. Because this list was not in existence at the time the initial subpoena in this matter were prepared, this Office has attached additional subpoenas to both Committees requesting this list.

The second type of document needed to help complete this investigation are materials referenced in the Committees' submissions. As previously noted, this Office received materials said to be responsive to the Commission's subpoenas. Reviewing

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these materials, this Office noted references to documents also apparently responsive to the subpoenas that were not provided. This Office compiled a list of these missing documents. (Attachment 3). On July 15, 1988, at Senator Hart's deposition, staff provided respondent's counsel with a copy of this list and requested the noted documents. In the absence of a response, a written request was made for these documents. (Attachment 2). To date, the documents have not been provided.

In light of the sporadic production of documents and the Committee's less than cooperative attitude, this Office believes that the Committee's index and OGC's list of the missing documents will best be obtained using the Commission's subpoena powers rather than informal requests. Accordingly, attached for Commission approval are subpoenas referencing the earlier subpoenas and requesting the noted additional materials. After forwarding these subpoenas to respondents, this Office will report to the Commission.

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III. **RECOMMENDATIONS**

Approve the attached subpoenas and letter.

4/23/90
Date

Lawrence M. Noble
General Counsel

Attachments
1. Committee's Letter
2. Request for Committee's List
3. OGC's List for Further Submissions
4. Subpoenas (2)
5. Letter

Staff Assigned: Patty Reilly

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Americans With Hart, Inc. and Bernard E. Schneider, as treasurer	)	MUR 2583
Friends of Gary Hart - 1988, Inc. and Stephen D. Alfers, as treasurer	)	
Gary W. Hart	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do herby certify that on April 26, 1990, the Commission decided by a vote of 5-0 to approve the subpoenas and letter, as recommended in the General Counsel's Report dated April 23, 1990.

Commissioners Aikens, Elliott, Josefiak, McDonald and McGarry voted affirmatively for the decision; Commissioner Thomas did not cast a vote.

Attest:

4-26-90
Date

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

Received in the Secretariat:	Tues.,	April 24, 1990	11:09 a.m.
Circulated to the Commission:	Tues.,	April 24, 1990	4:00 p.m.
Deadline for vote:	Thurs.,	April 26, 1990	4:00 p.m.

dr

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 1, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Bernard E. Schneider, Esquire
Buchalter, Nemer, Fields & Younger
660 Newport Center Drive
Newport Beach, CA 92660

RE: MUR 2583
Americans with Hart, Inc., and
Bernard E. Schneider, as treasurer
Friends of Gary Hart-1988, Inc., and
Stephen D. Alfers, as treasurer
Gary W. Hart

Dear Mr. Schneider:

On March 3, 1988, your clients and you were notified that the Federal Election Commission had found reason to believe they had violated a number of sections of the Federal Election Campaign Act of 1971, as amended. Also on that date the Commission provided you with subpoenas for depositions and production of documents.

Pursuant to its investigation of this matter, the Commission has issued the attached additional subpoenas requiring you and your clients to provide information which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, U.S. Code.

It is required that you submit all responsive documents no later than May 15, 1990.

If you have any questions, please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Subpoenas (2)

9304353264 1

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 2583

SUBPOENA

TO: Friends of Gary Hart - 1988, Inc.
Stephen D. Alfers, Treasurer
c/o Bernard E. Schneider, Esquire
Buchalter, Nemer, Fields & Younger
660 Newport Center Drive, Suite 1400
Newport Beach, California 92660

Pursuant to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby subpoenas you to produce the documents listed on the attachment to this subpoena. Legible copies which, where applicable, show both sides of the documents, may be substituted for originals. The documents must be submitted to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. by May 15, 1990.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set her hand at Washington, D.C., this 1st day of May, 1990.

Lee Ann Elliott

Lee Ann Elliott, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Attachment
Document Request (4 pages)

2304353264 2

2304353264 3

INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from calendar years 1982 to 1988, inclusive.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

2304353264 4

DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

Attachment to Subpoena

The Commission incorporates by reference its previous request for documents in its subpoena dated March 3, 1988.

The Commission further requests the following documents:

1. All documents responsive to the attached list previously provided to respondents' counsel on July 15, 1988

2. All documents containing, constituting or relating to lists, indices, or other compilations of the contents of boxes of Americans With Hart, Inc.

2304353265 45

Re: MUR 2583

Other documents sought to expand on submissions:

May 6, 1988 submission

1. 00029 Memo from Richard to Mike, dated April 24, 1986

   Copy of itinerary for these dates:
   4-26-85; 4-28-85; 6-22-85; 10-18-85; 12-5-85; and
   12-8-85

   Copy of agenda for April 1985 retreat

   Copy of reports filed with FEC or Senate indicating payment of the flight costs listed on this page

2. 00030 Invoice from Karl Home Video Corporation

   Any prior invoices and any documentation or copies of commercials produced, including scripts and tapes

3. Copy of repayment to Stuart Karl for fundraising disbursement (travel and subsistence) of $5485 on 3-20-84

May 19, 1988 submission

1. 00084-00086 UCC financing statement and lease agreement

   Copy of the purchase agreement to which these relate

June 6, 1988 submission

1. Memo from Richard to Mike Novelli/Bill Dixon, dated 2/3/86

   Remainder of memo, only pages 1 and 2 received

June 10, 1988 submission

1. 00036 Schedule for November 10

   Copy of pages 1 and 3

2. 00041 Schedule for weeks of October 7 and 14, 1985

   Copy of the schedule for November 2, 1985
   Copy of the agenda for October 20 finance meeting

3. 00068 Memo from Mike Novelli, dated July 15

   Copy of the retreat agenda

9304353264646

4. 00143 and 00144 Memo from Bill Shore, dated August 1, 1986

   A complete copy of page 2

5. 00145 3rd Retreat
   00146 2nd Retreat
   00147 1st Retreat

   A copy of the agenda for each retreat and a copy of Mr. Hart's schedule for each day of each retreat

6. 00158 Memo, dated July 1, 1986

   A copy of all pages of this memo

7. Memo dated July 16, 1986 from Beth to Gary, re Uncovering Character

   A copy of the complete memo

9304353326447

June 15, 1986 submission

1. 00222 Downum memo, dated March 17, 1988

   Was a review of the Stratton and Associates' advances to Walto completed? A copy of the results or any other materials

2. 00228 and 00229 Downum memo, dated February 12, 1988

   Payroll agreement or signed per diem agreement from Walto

3. 00237 February 1988 - Missing documentation as of 3/8/88

   Stratton invoices, particularly any referencing advances to Walto

Miscellaneous

1. Generally identify by year each agenda and schedule provided in each submission

2. Index to 1984 committee documents

3. Index to 1988 committee documents

4. All itineraries held by both committees

5. Listing of debt reduction fundraisers on behalf of 1984 committee (by date and location)

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 2583)

SUBPOENA

TO: Americans with Hart, Inc.
Bernard E. Schneider, Treasurer
Buchalter, Nemer, Fields & Younger
660 Newport Center Drive, Suite 1400
Newport Beach, California 92660

Pursuant to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby subpoenas you to produce the documents listed on the attachment to this subpoena. Legible copies which, where applicable, show both sides of the documents, may be substituted for originals. The documents must be submitted to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. by May 15, 1990.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set her hand at Washington, D.C., this 1st day of May, 1990.

Lee Ann Elliott

Lee Ann Elliott, Chairman
Federal Election Commission

ATTEST:

Marjorie W Emmons

Marjorie W. Emmons
Secretary to the Commission

Attachment
Document Request (4 pages)

9304353264 8

INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from calendar years 1982 to 1988, inclusive.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

2304353264 9

DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

9304353265O

Attachment to Subpoena

The Commission incorporates by reference its previous request for documents in its subpoena dated March 3, 1988.

The Commission further requests the following documents:

1. All documents responsive to the attached list previously provided to respondents' counsel on July 15, 1988

2. All documents containing, constituting or relating to lists, indices, or other compilations of the contents of boxes of Friends of Gary Hart, 1988, Inc.

2304335326551

Other documents sought to expand on submissions:

May 6, 1988 submission

1. 00029 Memo from Richard to Mike, dated April 24, 1986

   Copy of itinerary for these dates:
   4-26-85; 4-28-85; 6-22-85; 10-18-85; 12-5-85; and 12-8-85

   Copy of agenda for April 1985 retreat

   Copy of reports filed with FEC or Senate indicating payment of the flight costs listed on this page

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   Any prior invoices and any documentation or copies of commercials produced, including scripts and tapes

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1. 00084-00086 UCC financing statement and lease agreement

   Copy of the purchase agreement to which these relate

June 6, 1988 submission

1. Memo from Richard to Mike Novelli/Bill Dixon, dated 2/3/86

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   Copy of pages 1 and 3

2. 00041 Schedule for weeks of October 7 and 14, 1985

   Copy of the schedule for November 2, 1985
   Copy of the agenda for October 20 finance meeting

3. 00068 Memo from Mike Novelli, dated July 15

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2304353265 2

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   00146 2nd Retreat
   00147 1st Retreat

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   A copy of the complete memo

9304353265 3

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1. 00222 Downum memo, dated March 17, 1988

   Was a review of the Stratton and Associates' advances to Walto completed? A copy of the results or any other materials

2. 00228 and 00229 Downum memo, dated February 12, 1988

   Payroll agreement or signed per diem agreement from Walto

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   Stratton invoices, particularly any referencing advances to Walto

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1. Generally identify by year each agenda and schedule provided in each submission

2. Index to 1984 committee documents

3. Index to 1988 committee documents

4. All itineraries held by both committees

5. Listing of debt reduction fundraisers on behalf of 1984 committee (by date and location)

OGC 6195

FRIENDS OF GARY HART 1988

May 7, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 MAY 10 PM 3:30

90 MAY 10 PM 3:14

Ms. Patty Reiley
Federal Election Commission
Washington, DC 20463

Re: MUR 2583

Dear Ms. Reiley:

Pursuant to our telephone conversation today, and in an effort to comply with the Federal Election Commission's letter and subpoena dated May 1, 1990, please send a copies of the March 3, 1988 reason to believe notification, and the related Subpoenas and Questions of the Commission to

Friends of Gary Hart - 1988, Inc.
Mr. Stephen D. Alfers, Treasurer
370 17th St., Suite 4700
Denver, CO 80202

Thank you for your assistance.

Sincerely,

Jim E. Downum

Jim E. Downum

2304353265 54

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 22, 1990

Stephen D. Alfers, Treasurer
Friends of Gary Hart 1988
370 17th Street
Suite 4700
Denver, CO 80202

RE: MUR 2583
Friends of Gary Hart 1988 and
Stephen D. Alfers, as treasurer

Dear Mr. Alfers,

Pursuant to the request of Jim Downum, enclosed please find a copy of the Commission's March 4, 1988 reason to believe notification letter and the Commission's initial subpoena in the above-captioned matter. Please note that your response to the Commission's most recent subpoena was due on May 15, 1990. To confirm your intention to comply forthwith with the Commission's subpoena, please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690, within five days of your receipt of this letter.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Jonathan Bernstein
Assistant General Counsel

Enclosures

9304353265

RECEIVED
FEDERAL ELECTION COMMISSION

90 MAY 29 AM 9:07

BEFORE THE FEDERAL ELECTION COMMISSION **SENSITIVE**

In the Matter of)
)
Gary Hunt) MUR 2583
)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On June 14, 1988, the Commission found reason to believe Gary Hunt violated 2 U.S.C. § 441f by permitting his name to be used to effect the contribution of another. Subsequently, the Commission and respondent entered into conciliation prior to a finding of probable cause to believe.

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II. **RECOMMENDATIONS**

1. Accept the attached conciliation agreement with Gary Hunt.

2. Close the file as to this respondent.

3. Approve the attached letter.

5/24/90
Date

Lawrence M. Noble
General Counsel

Attachments
1. Conciliation Agreement
2. Photocopy of civil penalty check
3. Letter to Respondent

Staff Assigned: Patty Reilly

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2583
Gary Hunt)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 31, 1990, the Commission decided by a vote of 5-0 to take the following actions in MUR 2583:

1. Accept the conciliation agreement with Gary Hunt, as recommended in the General Counsel's report dated May 24, 1990.
2. Close the file as to this respondent.
3. Approve the letter, as recommended in the General Counsel's report dated May 24, 1990.

Commissioners Aikens, Elliott, Josefiak, McDonald, and Thomas voted affirmatively for the decision; Commissioner McGarry did not not cast a vote.

Attest:

May 31, 1990
Date

Hilda Arnold
for Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Tuesday, May 29, 1990 9:07 a.m.
Circulated to the Commission: Tuesday, May 29, 1990 11:00 a.m.
Deadline for vote: Thursday, May 31, 1990 11:00 a.m.

dh

9304353265 8

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

June 5, 1990

Jeffrey M. Ettinger, Esquire
2030 East University Drive
Rancho Dominguez, CA 90220

RE: MUR 2583
Gary Hunt

Dear Mr. Ettinger:

On May 31, 1990, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your client's behalf in settlement of a violation of 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to your client.

This matter will become a part of the public record within 30 days after it has been closed with respect to all other respondents involved. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel. Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

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. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

9304353265 9

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

2304353266660

OGC 5946

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 APR 16 PM 12:41

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 2583
Gary Hunt	)	
	)	

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Gary Hunt ("Respondent") violated 2 U.S.C. § 441f.

NOW, THEREFORE, the Commission and the Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent 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. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

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

1. Respondent is a former employee of Karl-Lorimar Home Video, Inc., a company organized under the laws of California. Stuart Karl was the president of Karl-Lorimar Home Video, Inc.

2. Respondent was asked by his employer, Mr. Karl, or at his direction to make a contribution by writing checks for $1,000 to Citizens for Townsend, Inc. and $1,000 to Dave Carter for Congress.

9304353261

3. Respondent made the solicited contributions and thereafter accepted reimbursement in cash for those contributions from his employer, Mr. Karl.

V. 1. Respondent allowed his name to be used to effect contributions by his employer in violation of 2 U.S.C. § 441f.

2. Respondent contends said violation was not knowing and willful and that he cooperated in the Commission's investigation.

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of three hundred and seventy-five dollars ($375), 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 have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

9304353266 2

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 enforceable.

FOR THE COMMISSION:

BY: _____ 6/5/90
Lawrence M. Noble
General Counsel
Date

FOR THE RESPONDENT:

_____ 4/10/90
Gary Hunt
Date

9304353266 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 12, 1990

Paul Sullivan, Esquire
Wunder & Diefenderfer
1615 L Street, N.W.
Washington, D.C. 20036

Re: MUR 2583
David F. Stein

Dear Mr. Sullivan:

It is the understanding of the Office of the General Counsel that there is no longer a pending criminal investigation of your client by the Department of Justice. Because Mr. Stein testified previously that he wished to cooperate with the Commission's investigation but was unable to at that time due to a fear of indictment, it appears he is now in a position to respond fully to the Commission's subpoena for documents and to give oral testimony. Consequently, this Office requests all documents responsive to the Commission's subpoena that have not been produced to date. Additionally, please contact Patty Reilly, the attorney assigned to this matter, in order to arrange a mutually agreeable date for Mr. Stein to appear and give testimony.

If you have any questions please contact Ms. Reilly at 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Lois G. Lerner by GGK

By: Lois G. Lerner
Associate General Counsel

9304353266664

MUR 2583

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 JUN 26 PM 1:46

LAW OFFICES
WUNDER, RYAN, CANNON & THELEN
1615 L STREET, N.W., SUITE 650
WASHINGTON, D. C. 20036
(202) 659-3005
FACSIMILE: (202) 659-3010

June 21, 1990

Patricia Reilly, Esq.
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

90 JUN 26 PM 3:13
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

Re: MUR 2583

Dear Ms. Reilly:

Subsequent to our recent telephone conversation regarding the above referenced matter, I spoke with my client as to how he wished to respond to your inquiry for further information in the form of a deposition and production of documents.

As you can appreciate, absent a letter from the Justice Department indicating that there is no longer an intent to pursue David Stein, we are in the same posture relative to production of documents and depositions as we have been since the start of this case. You indicated you would contact the Justice Department to obtain written confirmation of their position. Therefore, we will await your production of a letter from the Justice Department indicating Mr. Stein is no longer nor do they anticipate in the future, to be a possible target in this investigation.

Thank you for your time and attention.

Very truly yours,

Paul E. Sullivan

cc: Peter Bagatelos, Esq.
Ed Medvine, Esq.
David Stein

9304353266665

RECEIVED
FEDERAL ELECTION COMMISSION
90 JUN 28 PM 3:55

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)
)
Linda Cacia) MUR 2583
)

GENERAL COUNSEL'S REPORT

I. **BACKGROUND**

On June 14, 1988, the Commission found reason to believe Linda Cacia violated 2 U.S.C. § 441f by permitting her name to be used to effect the contribution of another. Subsequently, the Commission and respondent entered into conciliation prior to a finding of probable cause to believe.

9304353266

II. **RECOMMENDATIONS**

1. Accept the attached conciliation agreement with Linda Cacia.

2. Close the file as to this respondent.

3. Approve the appropriate letter.

6/28/90
Date

Lawrence M. Noble
General Counsel

Attachments
1. Conciliation Agreement
2. Photocopy of civil penalty check

Staff Assigned: Patty Reilly

9304353267

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2583
Linda Cacia)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 3, 1990, the Commission decided by a vote of 6-0 to take the following actions in MUR 2583:

1. Accept the conciliation agreement with Linda Cacia, as recommended in the General Counsel's Report dated June 28, 1990.

2. Close the file as to this respondent.

3. Approve the appropriate letter, as recommended in the General Counsel's Report dated June 28, 1990.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry and Thomas voted affirmatively for the decision.

Attest:

7-3-90
Date

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

Received in the Secretariat: Thursday, June 28, 1990 3:55 p.m.
Circulated to the Commission: Friday, June 29, 1990 12:00 p.m.
Deadline for vote: Tuesday, July 3, 1990 4:00 p.m.

dh

9304353266 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 10, 1990

Jeffrey M. Ettinger, Esquire
2030 East University Drive
Rancho Dominguez, CA 90220

RE: MUR 2583
Linda Cacia

Dear Mr. Ettinger:

On July 3, 1990, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your client's behalf in settlement of a violation of 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to your client.

This matter will become a part of the public record within 30 days after it has been closed with respect to all other respondents involved. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel. Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

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. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

9304353266 9

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

2304353267 0

OGC 6635

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 2583
Linda Cacia	)	
	)	

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Linda Cacia ("Respondent") violated 2 U.S.C. § 441f.

NOW, THEREFORE, the Commission and the Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent 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. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

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

1. Respondent is a former employee of Karl-Lorimar Home Video, Inc., a company organized under the laws of California. Stuart Karl was the president of Karl-Lorimar Home Video, Inc.

2. Respondent was asked by her employer, Mr. Karl, or at his direction to make a contribution by writing checks for $250 to Americans With Hart, Inc., and $500 to Dave Carter for Congress, and $100 to The Kerry Committee.

9304353267 1

3. Respondent made the solicited contributions and thereafter accepted reimbursement in cash for those contributions from her employer, Mr. Karl.

V. 1. Respondent allowed her name to be used to effect contributions by her employer in violation of 2 U.S.C. § 441f.

2. Respondent contends said violation was not knowing and willful and that she has cooperated in the Commission's investigation.

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of one hundred and seventy-five dollars ($175), 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 have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

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,

9304353267 2

made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

BY: _____
Lawrence M. Noble
General Counsel

Date 7/9/90

FOR THE RESPONDENT:

Linda Cacia
Linda Cacia

Date 5/3/90

9304353326673

BERNARD E. SCHNEIDER
660 NEWPORT CENTER DRIVE, SUITE 1400
NEWPORT BEACH, CA 92660

90 JUL -3 PM 1:31

July 2, 1990

90 JUL -5 PM 12:37

VIA TELECOPY AND FEDERAL EXPRESS

Patty Reilly
Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463

re: MUR 2583
Americans With Hart, Inc. ("AWH")
Friends of Gary Hart-1988, Inc. ("FOGH")

Dear Ms. Reilly:

As counsel to both, enclosed please find the separate responses of AWH and FOGH to your subpoena dated May 1, 1990. We have attempted to be as responsive as reasonably possible. AWH is without the resources necessary to review the documents referred to and is, in addition, no longer in possession or control of its records, all of which are scattered throughout at least Colorado in private and governmental hands.

We continue to be concerned about the involvement of FOGH in this MUR. There is little, if any, relationship between the alleged events which are the basis of the MUR and FOGH. We respectively request that FOGH be relieved as a party.

Very truly yours,

B E Schneider /vk

Enclosures

BES/vk:F8750-0001/50

2304353267374

BERNARD E. SCHNEIDER, ESQ.
660 Newport Center Drive
Suite 1400
Newport Beach, California 92660

FEDERAL ELECTION COMMISSION

IN THE MATTER OF ACTION PENDING BEFORE THE FEDERAL ELECTION COMMISSION	)	MUR 2583
	)	**RESPONSE OF FRIENDS OF GARY HART - 1988, INC. TO SUBPOENA**

TO GENERAL COUNSEL, FEDERAL ELECTION COMMISSION, 999 E. STREET, N.W., WASHINGTON, D.C. 20463:

Friends of Gary Hart - 1988, Inc. produces the following documents and otherwise responds to the subpoena dated May 1, 1990.

DATED: June 29, 1990

BERNARD E. SCHNEIDER

2304353267 5

May 6, 1988 submission

1. 0029 Memo from Richard to Mike, dated April 24, 1986.

   Copy of itinerary for these dates:
   4-26-85; 4-28-85; 6-22-85; 10-18-85; 12-5-85 and 12-8-85.

   Copy of agenda for April 1985 retreat.

   Copy of reports filed with FEC or Senate indicating payment of the flight costs listed on this page.

   Friends of Gary Hart - 1988, Inc. does not have knowledge or possession of these documents.

2. 0030 Invoice from Karl Home Video Corporation.

   Any prior invoices and any documentation or copies of commercials produced, including scripts and tapes.

   Friends of Gary Hart - 1988, Inc. does not have knowledge or possession of this invoice, commercial, script or tape.

3. Copy of repayment to Stuart Karl for fundraising disbursement (travel and subsidence) of $5,485 on 3-20-84.

   Friends of Gary Hart - 1988, Inc. does not have knowledge or possession of this document.

May 19, 1988 submission

1. 0084-0086 UCC financing statement and lease agreement.

   Copy of the purchase agreement to which these relate.

   Friends of Gary Hart - 1988, Inc. does not have knowledge or possession of these documents.

June 6, 1988 submission

1. Memo from Richard to Mike Novelli/Bill Dixon, dated 2/3/86.

   Remainder of memo, only pages 1 and 2 received.

   Friends of Gary Hart - 1988, Inc. does not have knowledge or possession of this memo.

June 10, 1988 submission

1. 0036 Schedule for November 10.

   Copy of pages 1 and 3.

9304353267 6

This schedule in not identified adequately for Friends of Gary Hart - 1988, Inc. to determine if it has knowledge or possession of the documents.

2. 0041 Schedule for weeks of October 7 and 124(??), 1985.

Copy of the schedule for November 2, 1985.
Copy of the agenda for October 20 finance meeting.

Friends of Gary Hart - 1988, Inc. does not have knowledge or possession of these documents.

3. 0068 Memo from Mike Novelli, dated July 15.

Copy of retreat agenda.

Friends of Gary Hart - 1988, Inc. does not have knowledge or possession of these documents.

4. 00143 and 00144 Memo from Bill Shore, dated August 1, 1986.

A complete copy of page 2.

Friends of Gary Hart - 1988, Inc. does not have knowledge or possession of these documents.

5. 00145 3rd Retreat.
00146 2nd Retreat.
00147 1st Retreat.

A copy of the agenda for each retreat and a copy of Mr. Hart's schedule for each day of each request.

Friends of Gary Hart - 1988, Inc. does not have knowledge or possession of these documents.

6. 00158 Memo, dated July 1, 1986.

A copy of all pages of this memo.

Friends of Gary Hart - 1988, Inc. does not have knowledge or possession of this document.

7. Memo dated July 16, 1986 from Beth to Gary, re Uncovering Character.

A copy of the complete memo.

Friends of Gary Hart - 1988, Inc. does not have knowledge or possession of this memo.

June 15, 1986 submission

1. 00222 Downum memo, dated March 17, 1988.

9304353267 7

Was a review of the Stratton and Associates' advances to Walto complete? A copy of the results or any other materials.

Friends of Gary Hart - 1988, Inc. completed a comprehensive review of all payments to Stratton and Associates in reimbursement of campaign activities. The results of the review were included in its "Response by Friends of Gary Hart - 1988, Inc. to Recommendations 2, 5, 7 and 9-17 of the Interim Audit Report of the Audit Division of the Federal Election Commission" dated March 25, 1989. Exhibits 8 and 9 detail all the reviewed transactions.

In particular, they document the following amounts involving Dennis Walto:

Exhibit 8, Page 4, Item IV.C.16.

> $350.00 was paid to Dennis Walto, 1402 Curtis St., Denver, CO for food for Iowa volunteers ($100.00) and subsistence in New Hampshire ($250.00).

Exhibit 8, Page 5, Item IV.E.10.

> $900.00 was paid to Dennis Walto, 1402 Curtis St., Denver, CO as an advance for a road trip.

Exhibit 8, Page 5, Item IV.E.11.

> $4,011.00 reimbursed Stratton & Associates for a payment to Imperial Travel to purchase airline tickets for the following:
>
> Walto $680.00

Exhibit 8, Page 6, Item V.B.3.

> $1,000.00 of the amount was paid to James F. Capelino by SA check number 291. During the final days of the first half of the FOGH account, I accompanied Gary Hart, Billy Shore, Dennis Walto, Kevin Sweeney and possibly one other campaign worker to New York City. Mr. Capelino, a New York attorney, cashed the check and returned the cash to me. I used the money to pay food and lodging costs in New York City for the above-listed individuals.

2. 00228 and 00229 Downum memo, dated February 12, 1988.

Payroll agreement or signed per diem agreement from Walto.

The per diem agreement was included in FOGH's "Response by Friends of Gary Hart - 1988, Inc. to Recommendations 2, 5, 7 and 9-17 of the Interim Audit Report of the Audit Division of the Federal Election Commission" dated March 25, 1989, at Exhibit 12.

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3. 00237 February 1988 - Missing documentation as of 3/8/88.

Stratton invoices, particularly any referencing advances to Walto.

Friends of Gary Hart - 1988, Inc. completed a comprehensive review of all payments to Stratton and Associates in reimbursement of campaign activities. The results of the review were included in its "Response by Friends of Gary Hart - 1988, Inc. to Recommendations 2, 5, 7 and 9-17 of the Interim Audit Report of the Audit Division of the Federal Election Commission" dated March 25, 1989. Exhibits 8 and 9 detail all the reviewed transactions.

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>
> Walto $680.00

Exhibit 8, Page 6, Item V.B.3.

> $1,000.00 of the amount was paid to James F. Capelino by SA check number 291. During the final days of the first half of the FOGH account, I accompanied Gary Hart, Billy Shore, Dennis Walto, Kevin Sweeney and possibly one other campaign worker to New York City. Mr. Capelino, a New York attorney, cashed the check and returned the cash to me. I used the money to pay food and lodging costs in New York City for the above-listed individuals.

Miscellaneous

1. Generally identify by year each agenda and schedule provided in each submission.

Such documents, if they exist at all, might by found among documents placed in permanent storage after the FEC audit in

2304353267 9

1989. Friends of Gary Hart - 1988, Inc. will attempt to provide such identification for all future submissions.

2. Index to 1984 committee documents.

Friends of Gary Hart - 1988, Inc. does not have knowledge or possession of these documents.

3. Index to 1988 committee documents.

On information and belief, an index of the boxes has never been prepared by Friends of Gary Hart - 1988, Inc.

4. All itineraries held by both committees.

Such documents, if they exist at all, might by found among documents placed in permanent storage after the FEC audit in 1989. Friends of Gary Hart - 1988, Inc. will attempt to provide such identification for all future submissions.

5. Listing of debt reduction fundraisers on behalf of 1984 committee (by date and location).

On information and belief, Friends of Gary Hart - 1988, Inc. did not organize or participate jointly in debt reduction fundraisers on behalf of the 1984 committee. Such documents, if they exist at all, might by found among documents placed in permanent storage after the FEC audit in 1989. Friends of Gary Hart - 1988, Inc. will attempt to provide such identification for all future submissions.

2304353226830

BERNARD E. SCHNEIDER, ESQ.
660 Newport Center Drive
Suite 1400
Newport Beach, California 92660

FEDERAL ELECTION COMMISSION

IN THE MATTER OF ACTION PENDING BEFORE THE FEDERAL ELECTION COMMISSION	)	MUR 2583
	)	**RESPONSE OF AMERICANS WITH HART, INC. TO SUBPOENA**

TO GENERAL COUNSEL, FEDERAL ELECTION COMMISSION, 999 E. STREET, N.W., WASHINGTON, D.C. 20463:

Americans With Hart, Inc. ("AWH") produces the following documents and otherwise responds to the subpoena dated May 1, 1990.

DATED: June 29, 1990

BERNARD E. SCHNEIDER

2304353268 1

May 6, 1988 submission

1. 0029 Memo from Richard to Mike, dated April 24, 1986.

   Copy of itinerary for these dates:
   4-26-85; 4-28-85; 6-22-85; 10-18-85; 12-5-85 and 12-8-85.

   Copy of agenda for April 1985 retreat.

   Copy of reports filed with FEC or Senate indicating payment of the flight costs listed on this page.

   The above documents, if they exist at all, are not in the possession or control of officers of AWH but are scattered throughout various locations in Colorado. If requested, AWH will attempt to centralize the records remaining in Colorado, for on site inspection by the FEC.

2. 0030 Invoice from Karl Home Video Corporation.

   Any prior invoices and any documentation or copies of commercials produced, including scripts and tapes.

   The above documents, if they exist at all, are not in the possession or control of officers of AWH but are scattered throughout various locations in Colorado. If requested, AWH will attempt to centralize the records remaining in Colorado, for on site inspection by the FEC.

3. Copy of repayment to Stuart Karl for fundraising disbursement (travel and subsidence) of $5,485 on 3-20-84.

   The above documents, if they exist at all, are not in the possession or control of officers of AWH but are scattered throughout various locations in Colorado. If requested, AWH will attempt to centralize the records remaining in Colorado, for on site inspection by the FEC.

May 19, 1988 submission

1. 0084-0086 UCC financing statement and lease agreement.

   Copy of the purchase agreement to which these relate.

   AWH does not have knowledge or possession of these documents.

June 6, 1988 submission

1. Memo from Richard to Mike Novelli/Bill Dixon, dated 2/3/86.

   Remainder of memo, only pages 1 and 2 received.

   The above documents, if they exist at all, are not in the possession or control of officers of AWH but are scattered

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throughout various locations in Colorado. If requested, AWH will attempt to centralize the records remaining in Colorado, for on site inspection by the FEC.

June 10, 1988 submission

The June 10, 1988 submission was not a submission of AWH. Accordingly, AWH does not have knowledge or possession of these documents.

June 15, 1986 submission

The items referred to in the June 15, 1988 submission were not submissions of AWH. Accordingly, AWH does not have knowledge or possession of these documents.

Miscellaneous

1. Generally identify by year each agenda and schedule provided in each submission.

   Such documents, if they exist at all, are not in the possession or control of officers of AWH but are scattered throughout various locations in Colorado. If requested, AWH will attempt to centralize the records remaining in Colorado, for on site inspection by the FEC. AWH will attempt to provide such identification for all future submissions.

2. Index to 1984 committee documents.

   On information and belief, an index of the boxes has never been prepared by AWH.

3. Index to 1988 committee documents.

   AWH does not have knowledge or possession of these documents.

4. All itineraries held by both committees.

   Such documents, if they exist at all, are not in the possession or control of officers of AWH but are scattered throughout various locations in Colorado. If requested, AWH will attempt to centralize the records remaining in Colorado, for on site inspection by the FEC. AWH will attempt to provide such identification for all future submissions.

5. Listing of debt reduction fundraisers on behalf of 1984 committee (by date and location).

   Such documents, if they exist at all, are not in the possession or control of officers of AWH but are scattered throughout various locations in Colorado. If requested, AWH will attempt to centralize the records remaining in Colorado, for on site inspection by the FEC. AWH will attempt to provide such identification for all future submissions.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 23, 1990

Paul Sullivan, Esquire
Wunder, Ryan, Cannon & Thelen
1615 L Street, N.W.
Washington, D.C. 20036

Re: MUR 2583
David F. Stein

Dear Mr. Sullivan:

This is to confirm your July 19, 1990 telephone conversation with Patty Reilly of this Office regarding the above-captioned matter. In your June 21, 1990 letter you stated that you wanted a written confirmation of the Department of Justice's position regarding your client and requested this Office to obtain such a writing. As Ms. Reilly stated, while we understand your concern, your client is the person who is best positioned to request this confirmation. Please advise us as to the status of this request in order that we may schedule a mutually convenient time to review documents and schedule oral testimony.

If you have any questions please contact Ms. Reilly at 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

By: Lois G. Lerner
Associate General Counsel

2304353268 4

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

September 4, 1990

Peter J. Kahn, Esquire
Laurie S. Fulton, Esquire
Williams & Connolly
839 Seventeenth Street, N.W.
Washington, D.C. 20006

RE: MUR 2583
Stuart Karl

Dear Mr. Kahn and Ms. Fulton:

This is to confirm that Stuart Karl's deposition is scheduled for October 24 and 25, 1990. The deposition will begin at 10 a.m. on each day at the Office of the General Counsel, 999 E Street, N.W., Washington, D.C. In order that we may pay Mr. Karl his witness fee, please provide us with his estimated in town travel mileage to the deposition site.

If you have any questions please contact Patty Reilly at 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Jonathan Bernstein
Assistant General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 17, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John C. Kenney
Deputy Assistant Attorney General
Criminal Division
Department of Justice
Washington D.C. 20530

RE: Stuart Karl Investigation

Dear Mr. Kenney:

In order that the Commission may carry out its statutory mission to investigate possible civil violations of the Federal Election Campaign Act of 1971, as amended, we wish to proceed with the Commission's investigation of Stuart Karl and the 1984 and 1988 Committees of Gary Hart, particularly as regards the activities of David Stein. We had previously been informed that the Department of Justice has completed its inquiry in this matter. Subsequently, we were informed in a letter dated May 30, 1990 from Gerald E. McDowell that the Department had reopened its investigation and considered it to be active again.

At this juncture, because David Stein has expressed a desire to cooperate with the Commission, the Commission would like to know whether the Department is still conducting an active investigation in this matter. In the event such an investigation is continuing, please inform us whether Mr. Stein is still considered a target of this investigation. If Mr. Stein is no longer considered a target, it is our intention to bring this information to Mr. Stein's attention to encourage his cooperation with the Commission's investigation.

If you have any questions, please contact Associate General Counsel Lois G. Lerner at 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

cc: Gerald E. McDowell, Chief
Public Integrity Section

9304353268 6

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

October 11, 1990

Peter J. Kahn, Esquire
Laurie S. Fulton, Esquire
Williams & Connolly
839 Seventeenth Street, N.W.
Washington, D.C. 20006

RE: MUR 2583
Stuart Karl

Dear Mr. Kahn and Ms. Fulton:

This is to confirm that Stuart Karl's deposition has been rescheduled for November 7 and 8, 1990. Although we are willing to agree to this date change, in light of the fact that Mr. Karl is under court order to appear and give sworn testimony, we will not entertain any requests for further postponements.

The deposition will begin at 10 a.m. on each day at the Office of the General Counsel, 999 E Street, N.W., Washington, D.C. We again request Mr. Karl's estimated in town travel mileage to the deposition site in order that we may pay him his witness fee.

If you have any questions please contact Patty Reilly at 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Jonathan Bernstein
Assistant General Counsel

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U.S. Department of Justice

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Washington, D.C. 20530

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RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 NOV -5 PM 2:43

Mr. Lawrence M. Noble
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

MUR 2583

Dear Mr. Noble:

Re: Stuart Karl Investigation

Your letter of September 17, 1990, to John C. Keeney has been referred to the Public Integrity Section for response. In your letter you inquire as to whether the Stuart Karl investigation is still open and pending, and whether David Stein is a "target" of that investigation. You state that Mr. Stein has expressed a desire to cooperate with the FEC, and you feel that if you can tell him that he is no longer considered a target of a criminal investigation, it may further encourage his cooperation.

The Karl investigation is still in an open status and we will advise you when this situation changes. Mr. Stein is not presently considered a "target" of this investigation and to our knowledge has never been told that he is a target of the investigation. However, he is considered to be a "subject" in this matter. It is possible that this status may end in the near future and as soon as that happens we will let you know.

Sincerely,

Gerald E. McDowell/g

Gerald E. McDowell, Chief
Public Integrity Section
Criminal Division

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 3, 1990

Paul Sullivan, Esquire
Wunder & Diefenderfer
1615 L Street, N.W.
Washington, D.C. 20036

Re: MUR 2583
David F. Stein

Dear Mr. Sullivan:

Pursuant to your previous telephone conversations with Patty Reilly of this Office, the Office of the General Counsel has inquired with the Public Integrity Section of the Department of Justice regarding the status of your client. We have been informed that Mr. Stein is not a "target" in the Stuart Karl investigation. Rather, he is considered to be a "subject" in this matter. We are further advised that this status may end in the near future.

Accordingly, because Mr. Stein testified previously that he wished to cooperate with the Commission's investigation but was unable to at that time due to a fear of indictment, it appears he is now in a position to respond fully to the Commission's subpoena for documents and to give oral testimony. Consequently, we again request all documents responsive to the Commission's subpoena that have not been produced to date. Additionally, please contact Patty Reilly, the attorney assigned to this matter, in order to arrange a mutually agreeable date for Mr. Stein to appear and give testimony.

If you have any questions please contact Ms. Reilly at 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

By: Lois G. Lerner
Associate General Counsel

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89 DEC -6 PM 4:10

BEFORE THE FEDERAL ELECTION COMMISSION **SENSITIVE**

In the Matter of)
)
Stuart Karl) MUR 2583
David Stein)

COMPREHENSIVE INVESTIGATIVE REPORT # 3

A. STUART KARL

On March 1, 1988, the Commission found reason to believe Stuart Karl knowingly and willfully violated 2 U.S.C. §§ 441a(a)(1)(A), 441a(a)(3), 441b(a) and 441f. Also on that date the Commission approved a subpoena for documents and for respondent's deposition. Following denial of a motion to quash this subpoena and respondent's failure to comply with it, on May 17, 1988, the Commission authorized the Office of the General Counsel to file civil suit to enforce this subpoena.

At the June 14, 1988 executive session, following Mr. Karl's indictment by a Los Angeles federal grand jury, the Commission determined that it was inappropriate to file suit against Mr. Karl at that time. Subsequently, Mr. Karl entered a guilty plea to two counts of a twelve count indictment, receiving a $60,000 fine and three years probation at his December, 1988 sentencing.

In light of the resolution of Mr. Karl's criminal case, this Office requested documents responsive to its subpoena from the Assistant United States Attorney in Santa Ana, California. These documents were copied by the Federal Bureau of Investigation, and then provided to Mr. Karl's counsel on May 16, 1989.

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Also on that date, in anticipation that Mr. Karl would not comply with the Commission's outstanding subpoena, the Commission authorized this Office to file civil suit to enforce this subpoena. Even after receiving a notice of suit authorization, and contrary to his representations regarding cooperation, Mr. Karl still refused to comply with the Commission's subpoena. Thus, on January 25, 1990, this Office filed a subpoena enforcement action in the California district court. In lieu of filing a response to the petition, counsel agreed to a consent order. The court entered this order on May 22, 1990.

On June 27, 1990, this Office contacted counsel to make arrangements for the production of documents and to set a date for Mr. Karl's deposition. Counsel stated, however, that he had not received a copy of the Court's order, and thus would not entertain these requests, notwithstanding the fact that he had stipulated to the consent order. After this Office produced a copy of this order, staff reviewed voluminous records at counsel's offices. Copies of specified materials were provided to the Office of the General Counsel of August 13, 1990. These materials numbered literally thousands of pages.

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On November 7 and 8, 1990 Mr. Karl appeared at the Commission for his deposition.[1] Based upon Mr. Karl's sworn statements, it appears that we have sufficient information to make recommendations regarding probable cause to believe as to some of the respondents in this matter, including Mr. Karl.[2] Additionally, Mr. Karl's testimony leads this Office to conclude that reason to believe recommendations may be required as to other individuals. After reviewing the transcript in this matter, this Office will report fully to the Commission.

B. DAVID STEIN

The Commission also found reason to believe David Stein violated 2 U.S.C. §§ 441a(a)(1)(A) and 441a(a)(3) and also issued a subpoena to this respondent. Following a denial of a motion to quash and a deposition where Mr. Stein asserted a Fifth Amendment privilege in response to questions, on May 17, 1988 the Commission authorized this Office to seek civil enforcement of this subpoena. On January 17, 1989, the Court enforced this subpoena in part; responsive documents were submitted to the Office of the General Counsel on February 1, 1989. Additionally, on October 31, 1989, a Memorandum of Decision and Order was entered enforcing the Commission's subpoena as to eight documents that had been

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1. This deposition was originally set for October 25 and 26, 1990, but was rescheduled to accommodate Mr. Karl's travel schedule.

2. During the deposition it became apparent that Mr. Karl had not produced his personal banking records. Pursuant to an agreement with counsel, Mr. Karl is taking steps to produce these documents.

submitted in camera to the Court. These were subsequently delivered to this Office.

Mr. Stein had also represented to staff at his deposition that he wished to cooperate with the investigation in this matter, but could not do so out of fear of self-incrimination. Accordingly, on June 12, 1990, this Office contacted Mr. Stein's counsel, stating that it was our understanding that because there was not a pending criminal investigation regarding Mr. Stein, his cooperation should be forthcoming. Counsel responded requesting written confirmation from the department of Justice. On November 3, 1990, this Office received confirmation from the Department of Justice that Mr. Stein was not a "target" of an investigation; rather he was a "subject". This Office notified counsel of this fact and restated our requests for production of any outstanding documents and for the setting of a deposition date. After receiving a response to this request, this Office will report to the Commission.

9304353226923

12/5/90
Date

Lawrence M. Noble
General Counsel

Staff Assigned: Patty Reilly

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/DELORES HARRIS
SECRETARY OF THE COMMISSION

DATE: DECEMBER 10, 1990

SUBJECT: MUR 2583 - COMPREHENSIVE INVESTIGATIVE REPORT #3
DATED DECEMBER 5, 1990.

The above-captioned matter was received in the Commission Secretariat at 4:16 p.m. on Thurs., December 6, 1990 and circulated on a 24-hour no-objection basis at 12:00 p.m. on Friday, December 7, 1990.

There were no objections to the above-captioned matter.

2304355326924

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 3, 1991

Laurie S. Fulton, Esquire
Williams & Connolly
839 Seventeenth Street, N.W.
Washington, D.C. 20006

RE: MUR 2583
Stuart Karl

Dear Ms. Fulton:

At the November 7 and 8, 1990 deposition of Stuart Karl in the above-captioned matter, questions were raised regarding whether Mr. Karl had produced records relating to his personal bank accounts. The parties agreed that upon his return to California, Mr. Karl would search his personal records and, if necessary, would contact his bank to determine whether these documents are available. Mr. Karl was then to advise you of the success of his search within three weeks of his return.

Please inform this Office in writing as to the status of these records. If you have any questions please contact Patty Reilly at 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

By: Lois G. Lerner
Associate General Counsel

2304353269295

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 9, 1991

Raymond D. Struthers
Raymond D. Struthers, Ltd.
717 D Street, N.W.
Washington D.C. 20004

Re: MUR 2583

Dear Mr. Struthers:

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, United States Code. Pursuant to 2 U.S.C. § 437g, the Federal Election Commission is conducting a confidential investigation in the above-captioned matter. The Commission does not consider you a respondent in this matter, but rather a witness only.

In furtherance of this investigation, the Commission requests certain information regarding materials and services you may have provided to any of the following persons or entities during 1984, 1985, 1986, and 1987: the Volunteer Committee, Americans with Hart, the Friends of Gary Hart, Karl Home Video, Karl Video Corporation, and Stuart Karl. Specifically, please describe all services provided to these entities during this time period. Additionally, please produce all documents and materials relating to these services, including but not limited to: scripts, contracts, invoices, check copies evidencing payments, and correspondence.

Because this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provision of 2 U.S.C. § 437g(a)(12)(A) applies. That section prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this case.

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The Commission appreciates your cooperation in responding to these questions and request for materials. Please contact Patty Reilly, the attorney assigned to this matter at (800) 424-9530 regarding your response.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

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06C 0122

LAW OFFICES
WUNDER, RYAN, CANNON & THELEN
1615 L STREET, N.W., SUITE 650
WASHINGTON, D. C. 20036
(202) 659-3005
FACSIMILE: (202) 659-3010

February 20, 1991

Lawrence Noble, Esq.
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Attn: Patty Reilly, Esq.

Re: David Stein
MUR 2583

91 FEB 20 PM 5:01
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

2304353269 8

Dear Ms. Reilly:

This letter is filed in response to our previous telephone conversations, and the Commission's letter relative to the handling of the abovereferenced matter by the Department of Justice (DOJ).

Your previous letter indicated that pursuant to discussions you had with the DOJ, Mr. Stein is no longer considered to be a "target". However, he remains a "subject" of their apparent ongoing investigation relative to the activities underlying the abovereferenced MUR.

On the advice of Mr. Stein's various legal counsel, this letter confirms that Mr. Stein still intends to invoke any and all privileges previously stated to the Commission regarding testimony or production of documents until such time as he is completely cleared of any potential action with the DOJ. The mere fact that he is presently a "subject" does not avoid the potential for future action by DOJ based on the facts at issue in this MUR.

Mr. Stein has also requested I indicate to you once again, that when those matters with DOJ are completely cleared up, he will cooperate to the extent possible with the Commission. Might I also suggest, that it may be beneficial for all parties concerned, that this matter move forward based upon the evidence which the Commission presently

maintains. Given the date of the alleged violations and the period of time the Commission has been conducting its investigation, it seems appropriate that the Commission take the information which is at hand and move forward so that these matters may be resolved with finality.

I look forward to your response.

Very truly yours,

Paul E. Sullivan

cc: David Stein
Chris Townsend
Ed Medvene, Esq.
Peter Bagatelos, Esq.
Chairman John McGarry
Vice Chairman Joan Aikens
Commissioner Lee Ann Elliott
Commissioner Tom Josefiak
Commissioner Danny L. McDonald
Commissioner Scott Thomas

9304353269

06C0169

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 FEB 25 AM 10:39

MUR 2583

FEBRUARY 21, 1990

JONATHAN BERNSTEIN, ESQ.
ASSISTANT GENERAL COUNSEL
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C 20463

DEAR MR. BERNSTEIN:

AS REQUESTED, ENCLOSED ARE THE TWO DOCUMENTS SUPPLIED TO THE FEDERAL BUREAU OF INVESTIGATION'S ORANGE COUNTY CALIFORNIA OFFICE IN MAY OF 1988:

THE COPY OF THE INVOICE TO KARL VIDEO CORPORATION REFLECTS CREDIT FOR AN $18,000 PAYMENT RECEIVED WHICH WAS APPLIED TO THE HART CAMPAIGN PRODUCTION EXPENSE.

THE SECOND DOCUMENT IS A COPY OF A PAGE FROM OUR INCOME LEDGER WHICH REFLECTS A $25,000 PAYMENT FROM KARL VIDEO WHICH WAS ALLOCATED TO PRODUCTION ($10,000) AND TELEVISION TIME PURCHASES ($15,000).

THESE TWO DOCUMENTS ARE THE ONLY REFERENCES WE COULD FIND TO RECORDS OF CORRESPONDENCE WITH KARL VIDEO.

IF YOU HAVE FURTHER QUESTIONS, I WILL BE HAPPY TO TRY AND ANSWER THEM.

SINCERELY,

RON POHL
VICE PRESIDENT OF FINANCE

ENCLOSURES

RECEIVED
FEDERAL ELECTION COMMISSION
91 FEB 25 PM 3:44

9304353270 0

RAYMOND D. STROTHER, LTD.
717 D Street, N.W., Washington, D.C. 20004 (202) 626-5650

9 3 0 4 3 5 3 2 7 0 1

DATE	FROM	Amount	1080 Number of Funds	3600 TV/Radio Commercial	3605 Fees	3608 Print ADV	3606 Adm O-H	3607 Edit Workshop	4602 Membership	4603 Program Cont.	4 Fu
4/2	EDMISTEN CAMPAIGN	6000000		600000					510000	300000	
4/2	Americans with Hunt	6810000		80400					56950	20100	
4/4	Americans with Hunt	4700000		56400					39950	14100	
4/4	EDMISTEN CAMPAIGN	10052500		100525					85446	50263	
4/5	Americans with Hunt	1600000				160000					
4/5	Americans with Hunt	6000000		72000					510000	180000	
4/6	Americans with Hunt	5140000		50400		100000			357000	126000	
4/6	Goldsmith For Senate	3000000			3000000						
4/6	Americans with Hunt	2010000		24000					171000	60000	
4/10	Americans with Hunt	2100000		16800		60000			119000	42000	
4/6	EDITOL STOPPED payment on Check	(36960)									
4/11	Edmisten for Senate	14163473		757405					12875884	5301184	
4/11	McRight for Congress	400000			400000						
4/11	Americans with Hunt	20100000		216000		2037000			153000	54000	
4/13	WM. MORGAN CO.	8156									
4/13	" " "	5921									
4/16	Bill Clinton Committee	938408				938408					
4/17	McRight Campaign Committee	1200000				1200000					
4/17	Friends of Walter Davis	2000000			2000000						
4/18	Americans with Hunt	15000000				15000000					
4/18	EDMISTEN campaign	11400000		19000					161500	45100	
4/19	" "	2490000		24900					24652	11442	
4/21	" "	5000000		45000		50000			382500	22500	
4/23	Bill Clinton Committee	11128394				11128394					
4/25	RDS Ltd "S" Acct	2750000	2750000								
4/26	" " " "	3400000	3400000								
4/26	Americans with Hunt	5000000		54000		50000			382500	135000	
4/26	KARL'S Production	7500000		118000		100000			112500	45000	
4/27	EDMISTEN CAMPAIGN	4000000		40000					340000	240000	
4/30	McRight "	348200		3482					25470	17410	
4/30	EDMISTEN Campaign	28800000		288000		180000			2280000	1440000	
		101165 1000	56500000	7943515	54100000	104196802			68381849	31339239	

RAYMOND D. STROTHER, LTD.
308 East Capitol Street, Suite No. 8, Washington, D.C. 20003 (202) 547-1999

Invoice

March 25, 1984

Karl Video Corporation
West 16th St.
Newport Beach, Ca 92663

Attn: Rama

Produciton Expenses:

20-20 Film Production	3/4/84	$ 4,337.00
Roger Jacobs	3/4/84	1,218.73
Recording Place	3/8/84	90.00
Color Lab	3/4/84	355.06
David Perry	3/5/84	1,980.00
	3/13/84	1,320.00
	3/2/84	199.62
Interface	3/19/84	4,991.86
	3/19/84	1,146.39
SUBTOTAL:		$ 15,638.66
10% Administrative Overhead		1,563.81
TOTAL:		$ 17,202.47
Balance due from 20-20 Film Productions:		1,046.61
		$ 18,249.08
LESS: Payment		(18,000.00)
BALANCE DUE:		$ 249.08

CC: James Dwinell

2304353227702

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 5, 1991

HAND-DELIVERED

Laurie S. Fulton, Esquire
Williams & Connolly
839 Seventeenth Street, N.W.
Washington, D.C. 20006

RE: MUR 2583
George Stuart Karl, Jr.

Dear Ms. Fulton:

As per our agreement, accompanying this letter please find one box of documents containing Stuart Karl's financial records for his personal checking accounts submitted to this Office on March 18, 1991, along with a schedule of those documents which have been reproduced.

If you have any questions, please contact the undersigned at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Patty Reilly
Senior Attorney

Enclosure

2304353270 3

DOCUMENTS REPRODUCED

FIRST INTERSTATE BANK

Account Number 185-4-48716

Account Statements
Statement Date

2/11/85 - 3/12/85

8/12/85 - 3/12/86

Checks

Number	Date
2254	2/5/84

Account Number 185-9-50826

Account Statements
Statement Date

5/21/84 - 9/23/85

Checks

Number	Date
118	8/8/84
122	9/18/84
125	10/25/84
126	10/12/84
127	10/15/84

Account Number 185-8-51371

Account Statements
Statement Date

11/23/84 - 2/22/85

4/22/85 - 10/23/85

9304353270 4

Deposits (no account numbers available)

Date	Amount
11/7/84	$10,228
12/11/84	$6,654.80
12/12/84	$10,000
1/17/85	$1,104.54
1/23/85	$13,313.71
3/27/85	$6,000
5/9/85	$12,572.85
6/11/85	$4,075.81
7/22/85	$4,000

WESTERN EMPIRE SAVINGS

Account Number 10800373-2

Account Statements
Statement Date

9/12/85 - 4/10/86

3/11/87

7/10/87

Account Number 10800372-4

Account Statements
Statement Date

9/12/85 - 4/10/86

3/11/87

Account Number 10800331-0

Account Statements
Statement Date

6/6/85 - 5/6/86

1/7/87

2304353270 5

3/5/87

Checks Number	Date
1002	8/22/85
1313	10/8/85
1056	11/8/85
1057	11/11/85
1351	1/23/86
1358	1/23/86
1402	2/5/86
1489	2/28/86
1534	3/5/86
1532	3/5/86
1541	3/6/86
1543	3/6/86
1584	3/18/86
1715	4/15/86
1729	4/18/86
1765	4/22/86

9304355327006

BANK OF AMERICA

Account Number 111-5600-388

Account Statements
Statement Date

11/30/84 - 6/30/86

8/29/86

1/30/87 - 3/31/87

Account Number 11150-00843

Account Statements
Statement Date

10/31/85 - 11/29/85

12/31/86 - 3/31/87

Checks

Number	Date
1072	10/27/86

Account Number 11150-00220

Account Statements
Statement Date

11/30/84 - 10/31/85

9304353207

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 8, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kelly Ramsey
13802 Tustin East Drive
Tustin, CA 92680

RE: MUR 2583
Kelly Ramsey

Dear Mr. Ramsey:

On June 14, 1988, the Federal Election Commission found reason to believe you violated 2 U.S.C. § 441f. After conducting an investigation in this matter, the Office of the General Counsel is preparing to move to the next stage of the enforcement process. If you have any questions, or additional information you would like to bring to the attention of the Commission, please immediately contact Jose M. Rodriguez, the attorney handling this matter, at (202)376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304353270 8

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

July 8, 1991

Alvin S. Michaelson, Esq.
Michaelson & Levine
1900 Avenue of the Stars
Suite 2512
Los Angeles, CA 90067

RE: MUR 2583
Rama Middel

Dear Mr. Michaelson:

On March 1, 1988, the Federal Election Commission found reason to believe your client violated 2 U.S.C. § 441f. After conducting an investigation in this matter, the Office of the General Counsel is preparing to move to the next stage of the enforcement process. If you have any questions, or additional information you would like to bring to the attention of the Commission, please immediately contact Jose M. Rodriguez, the attorney handling this matter, at (202)376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304353270 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 8, 1991

Jerry Nicholson, Esq.
Law Office of Jerry Nicholson
5375 East Second Street
Suite One
Long Beach, CA 90803

RE: MUR 2583
Robert W. Bonham

Dear Mr. Nicholson:

On June 14, 1988, the Federal Election Commission found reason to believe your client violated 2 U.S.C. § 441f. After conducting an investigation in this matter, the Office of the General Counsel is preparing to move to the next stage of the enforcement process. If you have any questions, or additional information you would like to bring to the attention of the Commission, please immediately contact Jose M. Rodriguez, the attorney handling this matter, at (202)376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304353271 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 8, 1991

Steven J. Bornstein
28 Avenue 28th
Venice, CA 90291

RE: MUR 2583
Steven J. Bornstein

Dear Mr. Bornstein:

On June 14, 1988, the Federal Election Commission found reason to believe you violated 2 U.S.C. § 441f. After conducting an investigation in this matter, the Office of the General Counsel is preparing to move to the next stage of the enforcement process. If you have any questions, or additional information you would like to bring to the attention of the Commission, please immediately contact Jose M. Rodriguez, the attorney handling this matter, at (202)376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304353271 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 8, 1991

Robynne Phillipsen
6165 Palau Street
Cypress, CA 90603

RE: MUR 2583
Robynne Phillipsen

Dear Ms. Phillipsen:

On June 14, 1988, the Federal Election Commission found reason to believe you violated 2 U.S.C. § 441f. After conducting an investigation in this matter, the Office of the General Counsel is preparing to move to the next stage of the enforcement process. If you have any questions, or additional information you would like to bring to the attention of the Commission, please immediately contact Jose M. Rodriguez, the attorney handling this matter, at (202)376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304353271 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 8, 1991

Edward Herrera
5027 E. Tango Circle
Anaheim, CA 92807

RE: MUR 2583
Edward Herrera

Dear Mr. Herrera:

On June 14, 1988, the Federal Election Commission found reason to believe you violated 2 U.S.C. § 441f. After conducting an investigation in this matter, the Office of the General Counsel is preparing to move to the next stage of the enforcement process. If you have any questions, or additional information you would like to bring to the attention of the Commission, please immediately contact Jose M. Rodriguez, the attorney handling this matter, at (202)376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304353271 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 8, 1991

Dennis Blackburn
19141 Woodfarm Terrace
Irvine, CA 92714

RE: MUR 2583
Dennis Blackburn

Dear Mr. Blackburn:

On March 14, 1988, the Federal Election Commission found reason to believe you violated 2 U.S.C. § 441f. After conducting an investigation in this matter, the Office of the General Counsel is preparing to move to the next stage of the enforcement process. If you have any questions, or additional information you would like to bring to the attention of the Commission, please immediately contact Jose M. Rodriguez, the attorney handling this matter, at (202)376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304355327114

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 8, 1991

Alison Weir
215 Diamond Avenue
Balboa Is., CA 92662

RE: MUR 2583
Alison Weir

Dear Ms. Weir:

On June 14, 1988, the Federal Election Commission found reason to believe you violated 2 U.S.C. § 441f. After conducting an investigation in this matter, the Office of the General Counsel is preparing to move to the next stage of the enforcement process. If you have any questions, or additional information you would like to bring to the attention of the Commission, please immediately contact Jose M. Rodriguez, the attorney handling this matter, at (202)376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304353271 15

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

July 8, 1991

Betty Ann Weir
215 Diamond Avenue
Balboa Is., CA 92662

RE: MUR 2583
Betty Ann Weir

Dear Ms. Weir:

On June 14, 1988, the Federal Election Commission found reason to believe you violated 2 U.S.C. § 441f. After conducting an investigation in this matter, the Office of the General Counsel is preparing to move to the next stage of the enforcement process. If you have any questions, or additional information you would like to bring to the attention of the Commission, please immediately contact Jose M. Rodriguez, the attorney handling this matter, at (202)376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304355327116

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 8, 1991

George Unwin
177F Riverside
Newport Beach, CA 92663

RE: MUR 2583
George Unwin

Dear Mr. Unwin:

On June 16, 1989, the Federal Election Commission found reason to believe you violated 2 U.S.C. § 441f. After conducting an investigation in this matter, the Office of the General Counsel is preparing to move to the next stage of the enforcement process. If you have any questions, or additional information you would like to bring to the attention of the Commission, please immediately contact Jose M. Rodriguez, the attorney handling this matter, at (202)376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304353277117

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 8, 1991

Abraham Kantzabedian
219 Grant Street
Newport Beach, CA 92663

RE: MUR 2583
Abraham Kantzabedian

Dear Mr. Kantzabedian:

On March 1, 1988, the Federal Election Commission found reason to believe you violated 2 U.S.C. § 441f. After conducting an investigation in this matter, the Office of the General Counsel is preparing to move to the next stage of the enforcement process. If you have any questions, or additional information you would like to bring to the attention of the Commission, please immediately contact Jose M. Rodriguez, the attorney handling this matter, at (202)376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304355327118

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 8, 1991

John D. Vandevelde, Esq.
Talcott, Lightfoot, Vandevelde,
Woehrle & Sadowsky
Thirteenth Floor
655 South Hope Street
Los Angeles, CA 90017

RE: MUR 2583
Jeff Jenest

Dear Mr. Vendevelde:

On June 14, 1988, the Federal Election Commission found reason to believe your client violated 2 U.S.C. § 441f. After conducting an investigation in this matter, the Office of the General Counsel is preparing to move to the next stage of the enforcement process. If you have any questions, or additional information you would like to bring to the attention of the Commission, please immediately contact Jose M. Rodriguez, the attorney handling this matter, at (202)376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

cc: Robert M. Talcott, Esq.

2304353271 19

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 8, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Patricia Bonham
219 Grant Street
Newport Beach, CA 92663

RE: MUR 2583
Patricia Bonham

Dear Ms. Bonham:

On June 14, 1988, the Federal Election Commission found reason to believe you violated 2 U.S.C. § 441f. After conducting an investigation in this matter, the Office of the General Counsel is preparing to move to the next stage of the enforcement process. If you have any questions, or additional information you would like to bring to the attention of the Commission, please immediately contact Jose M. Rodriguez, the attorney handling this matter, at (202)376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304353272O

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 8, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Anthony Douglas
127 Greenfield
Irvine, CA 92714

RE: MUR 2583
Anthony Douglas

Dear Mr. Douglas:

On June 14, 1988, the Federal Election Commission found reason to believe you violated 2 U.S.C. § 441f. After conducting an investigation in this matter, the Office of the General Counsel is preparing to move to the next stage of the enforcement process. If you have any questions, or additional information you would like to bring to the attention of the Commission, please immediately contact Jose M. Rodriguez, the attorney handling this matter, at (202)376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304353272 1

MUR 1922

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE SERVICES BRANCH

91 JUL 18 PM 2:27

177 Riverside Ave
Newport Beach, CA 92663-4018
July 15, 1991

Jose M. Rodriguez
Federal Election Commission
999 "E" Street, NW
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

91 JUL 19 PM 3:10

Dear Mr. Rodriguez,

I spoke with you regarding MUR 2583 on July 15, 1991. As I have said before, I have no recollection of making a contribution. I am concerned that my name could have been used without my knowledge or consent.

Please note my new address as shown above.

Sincerely,

Alison Weir

Alison Weir

9304353227222

OGC 1940

LAW OFFICES
TALCOTT, LIGHTFOOT, VANDEVELDE
WOEHRLE & SADOWSKY
THIRTEENTH FLOOR
655 SOUTH HOPE STREET
LOS ANGELES, CALIFORNIA 90017-3211
TELEPHONE: (213) 622-4750
TELECOPIER: (213) 622-2690

ROBERT M. TALCOTT
MICHAEL J. LIGHTFOOT
JOHN D. VANDEVELDE
CARLA M. WOEHRLE
STEPHEN B. SADOWSKY
MARIA E. STRATTON
JOHN S. CROUCHLEY
JOHN P. MARTIN
MELISSA N. WIDDIFIELD
SEAN K. KENNEDY

OF COUNSEL AND
RESIDENT IN SACRAMENTO OFFICE
QUIN DENVIR
SUITE 250
555 CAPITOL MALL
SACRAMENTO, CALIFORNIA 95814
TELEPHONE (916) 448-8868
TELECOPIER (916) 448-8965

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE SERVICES BRANCH
91 JUL 22 AM 11:56

July 17, 1991

91 JUL 23 AM 10:36

Lois G. Lerner
Associate General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 2583
Jeff Jenest
Your letter dated July 8, 1991

Dear Ms. Lerner:

Thank you for the opportunity to provide additional information regarding this matter. As indicated in our submission dated July 14, 1988, Mr. Jenest was an employee of Stuart Karl. He attended a fundraiser for Kathleen Kennedy Townsend in September, 1986. He made a contribution of $250.00 by personal check. He was not coerced, solicited, offered reimbursement, or reimbursed. There is no new or additional information known to us at this point.

We believe that the staff should recommend and the Commission should conclude that no violation took place.

We do request a copy of the staff's brief to the Commission and an opportunity to respond.

Yours very truly,

TALCOTT, LIGHTFOOT, VANDEVELDE
WOEHRLE & SADOWSKY

JOHN D. VANDEVELDE

JDV:ja

2304353273

06C 1969

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

LAW OFFICES OF
PILLSBURY MADISON & SUTRO

SAN FRANCISCO
SAN JOSE
WASHINGTON, D.C.
SAN DIEGO

SUITE 1200
725 SOUTH FIGUEROA STREET
LOS ANGELES, CALIFORNIA 90017
TELEPHONE (213) 488-7100
TELECOPIER (213) 629-1033

ORANGE COUNTY
WALNUT CREEK
SACRAMENTO
TOKYO

WRITER'S DIRECT DIAL NUMBER

(213) 488-7454

91 JUL 26 AM 9:09

July 22, 1991

91 JUL 25 AM 10:35

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

Jose M. Rodriguez, Esq.
Office of General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 2583--Steven J. Bornstein

Dear Mr. Rodriguez:

Thank you for so promptly returning my telephone call regarding the above-entitled matter. I enclose for your review and consideration the original of Mr. Bornstein's notarized declaration denying the allegations contained in the Commission's factual and legal analysis. As we discussed, I am assisting Mr. Bornstein as a friend, and we hope to resolve this misunderstanding before it becomes necessary for him to retain formal legal counsel. If you should need any further information or declarations, please do not hesitate to contact Mr. Bornstein or me.

I appreciate your continued assistance.

Very truly yours,

Jordan K. Yospe

JKY:lc
Enclosure

cc: Steven Bornstein

2304353272724

DECLARATION OF STEVEN J. BORNSTEIN

I, STEVEN J. BORNSTEIN, declare as follows:

1. The July 8, 1991 correspondence attached as Exhibit "A" from Lois G. Lerner, Associate General Counsel, Federal Election Commission, states that I am being investigated for potentially violating 2 U.S.C. Section 441f. I make this declaration in response to this allegation.

2. I have not at any time made a contribution to any political candidate in the name of another person. Moreover, I have never knowingly permitted my name to be used to effect such a contribution. Indeed, I have no knowledge of anyone ever using my name to effect such a contribution. Specifically, I did not permit Stuart Karl or anyone else to use my name to make contributions to Friends of Gary Hart-1988, Inc., The Kerry Committee and Citizens for Townsend, Inc. Finally, I have never accepted a contribution made by one person in the name of another person. Accordingly, I have never knowingly violated 2 U.S.C. Section 441f (Contributions in name of another person prohibited).

3. I am competent to testify and have personal knowledge of all matters set forth herein.

2304353272 5

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 18th day of July, 1991, at Los Angeles, California.

STEVEN J. BORNSTEIN

COUNTY OF LOS ANGELES)
) ss.
STATE OF CALIFORNIA)

On July 18th, 1991, before me, the undersigned, a Notary Public in and for said State, personally appeared STEVEN J. BORNSTEIN, personally known to me or proved to me on the basis of satisfactory evidence to be the person whose name subscribed to the within instrument and acknowledged that he executed same.

WITNESS my hand and official seal.

Notary Public in and for Said
County and State

My Commission expires: 8-2-93

OFFICIAL SEAL
SONIA METZ
Notary Public-California
LOS ANGELES COUNTY
My Commission Expires
August 2, 1993

90435327226

06C2175

LAW OFFICES OF JERRY NICHOLSON
5375 East Second Street, Suite One
Long Beach, California 90803
(213) 439-7387

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 AUG 13 AM 11:23

August 6, 1991

91 AUG 13 PM 4:39

Jose M. Rodriquez, Esq.
FEDERAL ELECTION COMMISSION
Washington D.C. 20463

Re: MUR 2583 Robert W. Bonham
Our File No. 327.01

Dear Mr. Rodriquez:

Pursuant to our earlier telephone conversation, please accept this correspondence as a formal response to the July 8, 1991 correspondence from Lois Lerner.

By correspondence dated June 20, 1988, my client, Mr. Robert Bonham was apprised of the Federal Election Commission's intent to proceed with an investigation regarding an alleged violation of 2 U.S.C. Section 441f that occurred as a result of actions taken by my client and others.

On July 5, 1988, my office began correspondence with the office of general counsel specifically Ms. Celia Jacoby, in an attempt to provide all information in our possession as to the facts of the case and in order to continue a line of cooperation that was begun by fully and voluntarily cooperating with the Federal Bureau of Investigation in their investigation of this same matter.

On July 21, 1988, my office supplied responses to the requests by the Federal Election Commission.

Thereafter, my office continued to interact with Ms. Jacoby and provided her with xerox copies of the checks that were requested by her and continued to communicate telephonically with her in order to provide prompt response and support in the investigation of this matter.

Our last correspondence to Ms. Jacoby was on November 28, 1988.

Subsequently on April 3, 1989, correspondence was sent to Ms. Jacoby requesting a response to our November 28, 1988 correspondence. No response to either of those correspondence were received.

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Once again on April 11, 1989, requests were submitted for a response and also for conciliation negotiations prior to a finding of probable cause. On July 7, 1989, a response was finally received declining to enter into pre-probable cause conciliation and a new attorney whose name is Patty Reilly was assigned to the matter.

Once again the facts of the case were explained to Ms. Reilly in an attempt to explain to the commission the facts and circumstances surrounding this case.

From that last contact in approximately July of 1989 to present, we have heard absolutely nothing from the Federal Election Commission or its counsel regarding this matter.

On July 11, 1991, the above-referenced correspondence was received by my office and, as you will recall, I immediately contacted you to apprise you of the background facts of this case at that time.

2 U.S.C. 441F indicates that "No person shall make contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another person."

The requirements for a violation of this section have been thoroughly set forth in a law review article entitled Nicholson, Political Campaign Expenditure Limitations in the Unconditional Condition Doctrine, 10 Hastings Constitutional Law Quarterly 601, Spring 1983.

As that law review article discusses, it is necessary for the commission to be shown that the monies utilized in the contribution were not those of the individual upon whose name the contribution was made or that that individual making the contribution was somehow "reimbursed" for the monies so contributed.

As can be established by the records in this case, other individuals that were involved in this case were, in fact, reimbursed by Stuart Carl for their contributions in the form of cash.

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This is not the case with my client. There is absolutely no evidence that has been generated after several years of investigation that in any way indicates that my client was ever reimbursed for any of the contributions that he made or that the monies that he contributed were not his own.

Quite to the contrary, my client has met and fully cooperated with the Federal Bureau of Investigation in this matter, has provided all original documents in his possession and supplied the Federal Election Commission and the Federal Bureau of Investigation with complete and candid answers to all inquiries made of him regarding this matter.

From the inception of this investigation to date, my client has fully and promptly cooperated with all of the investigative agencies and has immediately provided any information provided of him to support the investigation in this case.

Quite to the contrary, despite many requests made by my office, several years have passed with absolutely no response coming from the office general counsel regarding this matter.

Should the office of general counsel seek to go forward with the prosecution of this matter, my client would be significantly prejudiced by the inordinate amount of delay that has occurred.

As I hope you can see by the chronology of the events outlined in this correspondence, there exists absolutely no evidence, whatsoever, that my client violated 2 U.S.C.441F and, quite to the contrary, all of the physical evidence and testimony that does exist indicates that at no time, did my client make or take any improper actions, at all.

Based upon the physical and testimonial evidence gathered to date on this matter, the inordinate delay in the investigation and prosecution of this case and in the interest of justice, I respectfully request your office to recommend to the Federal Election Commission that this investigation insofar as my client is concerned, be dropped and that any and all charges against him be dismissed.

Should you have any evidence, of any kind whatsoever, that would in any contradict the statements that I have set forth in this correspondence, I would respectfully request that you immediately contact me and provide me with that evidence. Should I fail to hear from you in response to this correspondence, I will assume that my understanding as set forth hereinabove is correct

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and that no such evidence exists and, therefore, that there is no basis for the continuation of this matter.

I look forward to speaking with you in the near future.

Thank you for your time and attention to this matter.

Very truly yours,

LAW OFFICES OF JERRY NICHOLSON

Jerry Nicholson

JN:lml

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MUR 2583
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FEDERAL ELECTION COMMISSION
MAIL CODE SECTION
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LAW OFFICES
WILLIAMS & CONNOLLY
839 SEVENTEENTH STREET, N.W.
WASHINGTON, D.C. 20006
(202) 331-5000

EDWARD BENNETT WILLIAMS (1920-1988)
PAUL R. CONNOLLY (1922-1978)

LAURIE S. FULTON
(202) 835-2787

August 20, 1991

91 AUG 21 PM 3:34
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

Ms. Patty Reilly, Esquire
Senior Attorney
Office of General Counsel
Federal Election Commission
999 E Street, N. W.
Washington, D. C. 20463

Re: George Stuart Karl, Jr. MUR 2583

Dear Ms. Reilly:

As you are aware, G. Stuart Karl, Jr. died of cancer on August 16, 1991. Therefore, I expect that the Federal Election Commission will immediately cease and desist from any further investigation or action regarding Mr. Karl. Please inform me what steps will be taken to close this file.

Thank you for your assistance.

Sincerely,

Laurie S. Fulton

Laurie S. Fulton

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 4, 1991

Laurie S. Fulton, Esquire
Williams & Connolly
839 Seventeenth Street, N.W.
Washington, D.C. 20006

RE: MUR 2583
Stuart Karl

Dear Ms. Fulton:

We have received your August 20, 1991 letter about the death of Mr. Karl two weeks ago. Please be advised that this Office's usual practice in such cases is to recommend the Commission take no further action and close the file with respect to the deceased respondent. When the Commission makes this determination with regard to Stuart Karl, we will notify you.

If you have any questions with respect to this matter, please contact Patty Reilly or Jose Rodriguez at (202) 291-3690.

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
George Stuart Karl, Elizabeth Baughman, Dennis Blackburn, Patricia Bonham, Robert W. Bonham, Steven J. Bornstein, Anthony J. Douglas, Edward Herrera, Jeff Jenest, Abraham Kantzabedian, Rama Middel, Robynne Phillipsen, Kelly Ramsey, Court Shannon, George Unwin, Alison Weir, Betty Ann Weir, Harold Weitzberg	)	MUR 2583

SENSITIVE

GENERAL COUNSEL'S REPORT

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I. BACKGROUND

This matter originally came before the Federal Election Commission (the "Commission") on March 1, 1988. At that time the Commission found reason to believe that Americans With Hart, Inc., and Friends of Gary Hart - 1988, Inc., and their respective treasurers, violated 2 U.S.C. §§ 434(b), 441a(f), 441b(a), and 441f, Gary W. Hart and Keith Glaser violated 2 U.S.C. §§ 441a(f) and 441b(a), Stuart Karl knowingly and willfully violated 2 U.S.C. §§ 441a(a)(1)(A), 441a(a)(3), 441b(a), and 441f, Lorimar Home Video, Inc., (formerly known as Karl Home Video, Inc., and Karl-Lorimar Home Video, Inc.) violated 2 U.S.C. §§ 441b(a) and 441f, Lorimar Telepictures Corporation violated 2 U.S.C. § 441b(a), David Stein violated 2 U.S.C. §§ 441(a)(1)(A) and (a)(3), and Doug Rosen violated 2 U.S.C. §§ 441a(f), 441b(a), and 441f. The Commission also found reason to believe that Abraham Kantzabedian and Rama Middel violated 2 U.S.C. § 441f by making political

contributions which were subsequently reimbursed by their employer, Stuart Karl or Karl Home Video, Inc., ("KHV").

An investigation was commenced in this matter and subpoenas were issued to several of the named respondents, including Messrs. Karl and Stein. Pursuant to the subpoenas, depositions were initially taken of Rama Middel, Gary Hunt (at that time a non-respondent witness), and Abraham Kantzabedian, all former employees of Mr. Karl. These deponents acknowledged making contributions to federal candidates which contributions were repaid by Mr. Karl. These deponents also affirmed under oath either a belief or knowledge that other employees had also exchanged a contribution check for cash at Mr. Karl's behest. Included in the response from Lorimar Telepictures Corporation and Lorimar Home Video, Inc., were declarations by other employees that Mr. Karl, acting through his assistant, had solicited contributions and later reimbursed them. Accordingly, as it appeared that other individuals had participated in check-swapping schemes the Commission on June 24, 1988, found reason to believe that numerous former employees of KHV and other individuals violated 2 U.S.C. § 441f. Additionally, based on further information, the Commission subsequently found reason to believe that George Unwin also violated 2 U.S.C. § 441f.

Messrs. Karl and Stein refused to comply with the Commission subpoenas based on their Fifth Amendment right against self incrimination. On May 17, 1988, the Commission authorized the Office of the General Counsel to file a civil suit to enforce the subpoenas issued to Messrs. Karl and Stein.

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On July 18, 1988, the Commission instituted a subpoena enforcement suit against Mr. Stein. FEC v. David Franklyn Stein, Civil Action No. CV 88-04345 PAR(ex). As a result of the action, Mr. Stein was ordered on October 31, 1989, to submit to the Commission certain specified documents. The Department of Justice has informed the Commission that Mr. Stein is still, though not a target, the subject of a federal criminal investigation. Accordingly, the Commission has not at this time sought Mr. Stein's full compliance with the subpoena.

On June 9, 1988, Mr. Karl was indicted by a Los Angeles federal grand jury. In light of the indictment and Mr. Karl's claim of Fifth Amendment Privilege, at the June 14, 1988, executive meeting, the Commission determined that it was inappropriate to file suit against Mr. Karl at that time. Subsequently, pursuant to a plea arrangement, Mr. Karl entered a guilty plea to two counts of a twelve count indictment. At his December 1988 sentencing he received a $60,000 fine and three years probation. In light of the resolution of Mr. Karl's criminal case, on January 18, 1989, this Office requested documents responsive to its subpoenas from the United States Attorney in Santa Ana, California. These documents were copied by the Federal Bureau of Investigation. Copies were provided to Mr. Karl's counsel on May 16, 1989, in order that they could be produced to the Commission.

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Also on that date, in anticipation that Mr. Karl would not comply with the Commission's outstanding subpoena, the Commission again authorized this Office to file suit to enforce the subpoena. On January 25, 1990, the Commission instituted a civil suit against Mr. Karl. FEC v. George Stuart Karl, Jr., Civil Action No. CV-90-0382 (Kn)(JRX). On May 22, 1990, a consent order was entered requiring Respondent's production of documents and appearance for deposition. The requested documents were produced on August 13, 1990, and Mr. Karl was deposed on November 7 and 8, 1990. Both the documents and testimony produced evidence a reimbursement scheme.

Since the Commission's initial findings, a number of the individuals against whom the Commission found reason to believe concerning violations of 2 U.S.C. § 441f have settled the matter by means of pre-probable cause conciliation. Responses have been received from the majority of the above captioned outstanding respondents.

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II. ANALYSIS

On August 16, 1991, George Stuart Karl passed away. While the available evidence establishes Mr. Karl's culpability concerning violations of the Act, in light of Mr. Karl's passing this Office recommends that the Commission take no further action and close the file as concerns Respondent.

The remainder of this report primarily addresses the culpability of the individual conduits involved in the

reimbursement scheme, see Attachment 1 (Contribution Schedule). This report also addresses Ms. Middel's culpability for assisting Mr. Karl in carrying out the reimbursement of employee contributions. Not addressed, however, is the involvement of the candidate Gary Hart, his two presidential campaigns, and the individuals associated with those campaigns in other activities which appear to be in violation of the Act, including Mr. Karl's provision of air travel, personnel, campaign materials, and production services.

Based on the following analysis, this Office will make recommendations that no further action be taken as concerns Elizabeth Baughman, Steven J. Bornstein, Edward Herrera, and Harold Weitzberg. Also based on this analysis this Office will outline those individuals against whom it intends to forward briefs recommending findings of probable cause to believe or no probable cause to believe in the near future. Lastly, this Office will recommend that the Commission enter into pre-probable cause conciliation with Court Shannon.

At issue are approximately ten separate episodes involving the reimbursement of contributions to numerous campaigns. The available evidence suggests that the majority of the contributions were reimbursed with the assistance of Rama Middel, Mr. Karl's former personal secretary. Ms. Middel testified to taking oral instruction from Mr. Karl regarding the employee and amount to be solicited. Ms. Middel would write this information down on an envelope or a note pad and proceed to solicit the targeted employees. These employees would be

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asked to contribute the specified amount with the explicit understanding that they would be reimbursed for their contribution by Mr. Karl. The checks for the solicited contributions would be turned over to Ms. Middel who would send them to the appropriate campaigns. Within a few days of the contributions, Ms. Middel, again upon Mr. Karl's instructions, would withdraw cash from Mr. Karl's bank account,[1] place the reimbursement amounts into individual envelopes and personally deliver these envelopes to the contributing employees. Having done this, she would tear up and throw away the reimbursement list she had previously made. See Deposition of Rama Middel at 75-77.

On other occasions it would be Mr. Karl directly who would solicit employees for contributions, again making it clear that they were to be reimbursed for their contribution. Even in these instances, however, it would be Ms. Middel that would carry out the actual reimbursement. Only when the solicitation involved a senior executive or a close personal friend would Mr. Karl carry out the solicitation and reimbursement himself.

While there is clear evidence of the structure of the reimbursement scheme, the evidence concerning many of the individual contributions is, however, conflicting. The Commission found reason to believe the respondents discussed

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1. Ms. Middel testified that while the reimbursement funds were in most instances from Mr. Karl's personal bank accounts, it is possible that on at least one occasion corporate funds were used to finance the reimbursement activity. See Deposition of Rama Middel at 77-78.

below violated section 441f of the Act by allowing their names to be used to effect contributions by another. Several of these respondents have admitted to being reimbursed for all the contributions attributed to them, while others have either partially or fully denied being reimbursed for similar contributions or failed to respond. Consequently, it is incumbent upon this Office to evaluate the credibility of the individual denials and the legitimacy of all outstanding contributions. Therefore, based on the available evidence and considering the circumstances surrounding the individual contributors and their contributions, this Office has made the following determinations concerning the legitimacy of the outstanding contributions.

Robert W. Bonham

At issue is a $100 contribution to The Kerry Committee and a $50 contribution to Citizens for Townsend, Inc., ("Townsend Committee"). Mr. Bonham has consistently denied having been reimbursed for either of these contributions. It is this Office's belief that no violation of the Act occurred as concerns Mr. Bonham's contribution to The Kerry Committee. While the evidence suggests that the majority of the contributions to this candidate were reimbursed, the same evidence tends to exculpate Respondent. It is Ms. Middel's testimony that while she did make reimbursements in connection with The Kerry Committee contributions, "there might have been some legitimate checks written in that particular case." Deposition of Rama Middel at 85. Moreover, it is Ms. Middel's

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further testimony that she does not recall reimbursing Respondent for his contribution to The Kerry Committee. See Id. at 91-92.

Further supporting Respondent's contention that his contribution was legitimate is the absence of his name on a document believed to be Ms. Middel's reimbursement list for employee contributions to The Kerry Committee ("Kerry List"). Among Mr. Karl's documents was a handwritten list of initials and names with accompanying dollar amounts written on Karl-Lorimar Home Video stationary with the caption "From The Desk Of Rama Middel" and with the notation "Reimb." on the upper right hand corner. The information noted on the instrument corresponds with several of the employee contributions to The Kerry Committee. In light of the correlation between the information listed and the employee contributions at issue as well as Ms. Middel's description of the reimbursement process, i.e. her creation of reimbursement lists, this Office concludes that this document represents Ms. Middel's reimbursement list with respect to contributions to The Kerry Committee and believes the absence of Mr. Bonham's name from Ms. Middel's reimbursement list demonstrates that Respondent was not reimbursed for his contribution to The Kerry Committee.

It is likewise this Office's belief that no violation of the Act occurred as concerns Mr. Bonham's contribution to the Townsend Committee. The available evidence suggests that though at least one contribution to the Townsend Committee was

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reimbursed, the majority were not reimbursed.[2] Separate responses received by this Office suggest that many of the smaller contributions to this campaign were voluntarily made by employees of Mr. Karl while attending a luncheon for the candidate at their employer's home. Moreover, Ms. Middel testified that, while having no direct knowledge concerning the possible reimbursement of these contributions as she was away on vacation during the period in question, she believed the Townsend Committee contributions to have not been reimbursed. See Id. at 89. This belief is based in part on being told by Linda Cacia, a respondent who has admitted to being reimbursed for three other separate contributions totaling $850, that her $40 contribution to the Townsend Committee was legitimate. See Id. at 80 and 81.

As described, Ms. Middel was the sole individual relied upon by Mr. Karl to carry out the reimbursement scheme. This Office believes it unlikely that in Ms. Middel's absence widespread reimbursements would have occurred or that had they occurred she would have not been privy to their occurrence. Consequently, in light of the lack of evidence of reimbursements concerning these contributions, this Office determines, absent any other probative evidence, that there is no probable cause to believe that Respondent's contribution to the Townsend Committee was reimbursed.

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2. Gary Hunt testified to being reimbursed by Ms. Middel on Mr. Karl's behalf for a $1,000 contribution to the candidate. See Deposition of Gary D. Hunt at 70-72.

Accordingly, in consideration of the exculpatory evidence concerning his other contribution and the lack of evidence suggesting that Respondent was reimbursed for his contribution to the Townsend Committee, this Office intends to forward a brief recommending that the Commission find no probable cause to believe Mr. Bonham has violated the Act.

Steven J. Bornstein

At issue is a $100 contribution to The Kerry Committee, a $250 contribution to the Townsend Committee, and a $750 contribution to Friends of Gary Hart - 1988, Inc., ("FGH"). Respondent denies being reimbursed for any of the listed contributions. As discussed above, this Office has in its possession what appears to be a list of employees reimbursed for their contributions to The Kerry Committee. Respondent's name appears on this list with an accompanying notation for $100, the amount of his contribution. This Office believes the evidence demonstrates that Respondent was reimbursed for his contribution to The Kerry Committee.

This Office, however, believes that Mr. Bornstein may not have been reimbursed for his $750 contribution to FGH or his $250 contribution to the Townsend Committee. Mr. Karl testified that he assumed all employee contributions made on December 3, 1986, to FGH to have been reimbursed. See Deposition of George Stuart Karl at 181. Along with Respondent, the Commission made findings against Gary Hunt, E. J. Oshins, and Court Shannon in connection with contributions to FGH. Ms. Oshins and Mr. Hunt, while admitting to having been reimbursed for other

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contributions, have denied being reimbursed for these late 1986 contributions. Only Mr. Court Shannon, an executive vice president of the video division at Karl-Lorimar and a long-time associate of Mr. Karl, has admitted being reimbursed for his. Moreover, upon investigation it was determined by this Office that Respondents Oshins and Hunt were in fact not reimbursed for their December 1986 contributions to FGH.[3] Consequently, in light of the conflicting responses and the lack of any clear evidence demonstrating the reimbursement of this contribution, this Office believes Mr. Bornstein was probably not reimbursed for his contribution to FGH. As discussed, the evidence likewise suggests that the majority of the contributions to the Townsend Committee were not reimbursed. Therefore, this Office believes it is likely that Respondent was not reimbursed for this contribution either.

While it is clear that Mr. Bornstein was reimbursed for his contribution to the The Kerry Committee, this Office, in light of the lack of any clear evidence demonstrating Respondent's acceptance of reimbursement as concerns the other contributions at issue and the negligible amount involved in his contribution to The Kerry Committee, recommends that the Commission take no further action against Respondent and close the file as concerns him.

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3. Respondents Oshins and Hunt have conciliated and neither of their conciliation agreements make mention of a violation in connection with a contribution to FGH.

Jeff Jenest

At issue is a $250 contribution to the Townsend Committee. Respondent denies being reimbursed for this contribution. As discussed, there is no evidence suggesting widespread reimbursement of these contributions. There is likewise no clear indication that Mr. Jenest has been reimbursed for his individual contribution to the Townsend Committee, nor is Respondent otherwise implicated in this matter. Accordingly, this Office intends to forward a brief recommending that the Commission find no probable cause to believe Mr. Jenest was reimbursed for his contribution to the Townsend Committee.

Robynne Phillipsen

At issue is a $40 contribution to the Townsend Committee. Respondent denies being reimbursed for this contribution. As discussed, it appears that many of the smaller contributions to the Townsend Committee were legitimate. Accordingly, in the absence of any evidence clearly indicating that Respondent was reimbursed, and in consideration of the fact that Respondent is not otherwise implicated in this matter, this Office intends to forward a brief recommending that the Commission find no probable cause to believe Ms. Phillipsen was reimbursed for her contribution to the Townsend Committee.

Betty Ann Weir

At issue is a $1,000 contribution to Americans With Hart, Inc. ("AWH") and a $1,000 contribution to Carol Ann Bradford for Congress ("Bradford Committee"). In her response Respondent admits to being reimbursed for the $1,000

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contribution to AWH but, despite having been asked, neither confirms nor denies being reimbursed for her contribution to the Bradford Committee. Of the other four individuals who the Commission found reason to believe against concerning contributions to the Bradford Committee, only one (Harold Weitzberg) denies being reimbursed for the contribution. Mr. Weitzberg has generally denied being reimbursed for any contributions. The remaining three respondents have admitted to being reimbursed. Moreover, Mr. Karl testified that he believes all the contributions to the Bradford Committee were reimbursed. See Deposition of George Stuart Karl at 183. Therefore, the available evidence indicates a pattern of reimbursements as concerns the Bradford Committee, suggesting that all contributions at issue were reimbursed. Accordingly, this Office intends to forward a brief recommending that the Commission find probable cause to believe Respondent was reimbursed for both her contributions.

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Alison Weir

At issue is a $500 contribution to AWH on June 1, 1984. Respondent consistently denies both making and being reimbursed for any such contribution. In fact, in a recent submission Respondent reiterated her claim that she has no recollection of making the contribution at issue, adding that she believes her name may have been used without her knowledge or consent. This Office, however, is in possession of a copy of a check conclusively evidencing Respondent's making of the contribution. The check signed by Respondent and dated May 24,

1984, is made payable to AWH for the amount of $500. Clearly this is the check for the contribution.

As a non-employee and personal friend of Mr. Karl's, it appears that Respondent would have been solicited and reimbursed for the contribution by Mr. Karl personally. Ms. Middel has testified to the effect that all of the employee contributions made during 1984 were reimbursed. See Deposition of Rama Middel at 87 and 91. Ms. Middel has also testified that to her knowledge the only non-employee to have been reimbursed for political contributions is George Unwin. Id. at 73. As noted, however, Betty Ann Weir, Respondent's mother and another non-employee personal friend of Mr. Karl, admitted to being reimbursed by Mr. Karl for an earlier contribution to the same candidate.[4] In light of Respondent's apparently less than candid submissions to the Commission concerning her making of the contribution, this Office does not find Ms. Alison Weir to be a credible respondent. Consequently, considering the lack of significance to be afforded Respondent's denials, the conflicting testimony concerning the reimbursement of contributions made during the period at issue, and Respondent's mother's admission to being reimbursed for a similar contribution, this Office intends to forward a brief recommending that the Commission find probable cause to believe Respondent was reimbursed for her contribution to AWH.

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4. The contribution was for $1,000 and was made on February 6, 1984, several months prior to Respondent's contribution of June 1, 1984.

Harold Weitzberg

At issue is a $1,000 contribution to AWH, a $500 contribution to the Bradford Committee, and a $500 contribution to Cranston for President. Respondent denies being reimbursed for any of the listed contributions. Respondent does relate, however, that all these contributions were solicited by Stuart Karl and that Mr. Karl had offered to reimburse them. Mr. Weitzberg declined this offer but informed Mr. Karl that his patronage would be welcomed at Respondent's wife's jewelry business.[5] Respondent specifically testified that:

> If he felt he wanted to do me a favor, my wife had an antique jewelry business. If he was considering buying any jewelry, I would appreciate him looking at my wife's inventory first. He did in fact make a number of purchases over the next few months. These were made at retail value of the pieces comparable to the price anyone would have been sold the pieces.

There is no clear indication that Respondent was reimbursed for his contributions. Ms. Middel testified to believing she had solicited Respondent, but had no specific recollection of the event. See Deposition of Rama Middel at 107. However, as vice-president of sales in the corporation Mr. Weitzberg may have been one of the employees personally solicited my Mr. Karl, thereby, substantiating his account of the solicitation. Thus, while it appears that Mr. Karl did in fact solicit and offer to reimburse Respondent, there is no clear indication that

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5. Mr. Weitzberg also noted that his wife made a $1,000 contribution to AWH in 1984.

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Mr. Weitzberg was reimbursed in cash or that Mr. Karl's subsequent purchase of jewelry from Respondent's wife's jewelry business was intended as reimbursement for the previously solicited contributions. Consequently, this Office recommends that the Commission take no further action and close the file as concerns Respondent.

Rama Middel

At issue are the following contributions:

Amount of Contribution	Date of Contribution	Recipient Committee
$ 250	1/26/84	AWH[6]
200	7/12/84	AWH
50	1/1/85	AWH
40	10/1/85	AWH
250	11/6/84	The Bradford Committee
200	3/18/86	The Kerry Committee
500	5/27/86	Dave Carter for Congress ("Carter Committee")
1,000	10/30/86	Committee for Tim Wirth, Inc.

Respondent has testified to having been reimbursed for all but the contribution to the Kerry Committee and the $40 contribution to AWH in 1985.

While not specifically admitted, the implication is that Ms. Middel was also reimbursed for these last two contributions. Ms. Middel testified to being reimbursed for all contributions solicited by Mr. Karl. See Deposition of Rama Middel at 66. Moreover, the previously discussed Kerry List shows an entry for "RM" with an accompanying notation for $200, the amount of her

6. As testified, the check was made out to "Friends of Gary Hart."

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contribution to the Kerry Committee[7] and Ms. Middel has admitted to being reimbursed for a contribution similar to her $40, 1985, AWH contribution. In light of the available evidence, including Ms. Middel's testimony and admissions, this Office believes there is probable cause to believe that Respondent was reimbursed for all contributions attributed to her.

As previously discussed, Ms. Middel had complete knowledge of and was instrumental in the reimbursement of employee contributions. Additionally, though never testifying to having discussed the impropriety of the reimbursements with Mr. Karl, Respondent did testify to making a contribution in her name for Mr. Karl as he was "maxed-out" to a particular candidate. See Id. at 108. The implication of Ms. Middel's testimony is that she was aware of the limits on an individual's federal political contributions and consequently was necessarily aware that the reimbursements were intended to circumvent this limit in violation of federal law. Accordingly, this Office intends to forward a brief recommending to the Commission findings of probable cause to believe that Ms. Middel knowingly and willfully violated 2 U.S.C. § 441f by assisting in the making of contributions in the name of another and by allowing her name to be used to effect contributions by another.

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7. Mr. Karl testified to the initials "RM" on the document referring to Rama Middel. See Deposition of George Stuart Karl at 169.

George Unwin

At issue are three $1,000 contributions made to AWH, the Carter Committee, and the Townsend Committee. Though there has been no forthcoming response from Mr. Unwin, this Office assumes notice as the initial notification was never returned as improperly addressed. Rama Middel testified that Respondent was a non-employee who had been reimbursed for his contributions by Mr. Karl. See Deposition of Rama Middel at 73. Ms. Middel further testified that any contributions made by Mr. Unwin would undoubtedly have been reimbursed as he had not the financial means to make political contributions. See Id. at 105. Mr. Unwin was deposed in connection with Lorimar Telepictures Corp. v. Stuart Karl, No. 554278, and at that time, August 9, 1988, testified to living on Mr. Karl's personal boat, the Oz, and to having no manner of income. See Deposition of George Reginald Unwin at 8-15. Mr. Unwin's testimony adds credence to Ms. Middel's characterization. In light of the above, and the substantial sums involved in the contributions, this Office believes there is probable cause to believe Respondent was reimbursed. Accordingly, this Office intends to forward a brief recommending that the Commission find probable cause to believe Respondent was reimbursed for his contributions.

Elizabeth Baughman

At issue is a $50 and a $200 contribution to AWH. While the evidence suggests that these contributions may have in fact been reimbursed, this Office has been unable to successfully notify Respondent of the Commission's initial reason to believe

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findings. Initial notice was sent to Respondent on June 20, 1988. This notice was returned to the Commission as improperly addressed and was resent on August 1, 1988, to a different address. This second notice was likewise returned. Attempts to locate a current mailing address for Respondent proved fruitless. In consideration of this and the advanced stage of the matter, this Office intends to recommend that the Commission take no further action as concerns Respondent and close the file as to her.

Abraham Kantzabedian and Patricia Bonham

At issue are contributions of $1,000 by each spouse to AWH. Mr. Kantzabedian testified to having been reimbursed for his contribution to AWH. See Deposition of Abraham Kantzabedian at 71. While there has been no separate response forthcoming from Ms. Bonham, her husband has also testified concerning the contribution attributed to her. Mr. Kantzabedian's testimony is that Mr. Karl had asked him to solicit his wife for a contribution. He had asked his wife to make the contribution, but did not tell her that Mr. Karl would be reimbursing her for it. Instead, Mr. Katzabedian told Ms. Bonham that he would from his own funds deposit money into her separate bank account in the amount of the contribution, with the knowledge that he would ultimately be reimbursed for both contributions by Mr. Karl. Id. at 99-102.

This Office believes Ms. Bonham's lack of knowledge regarding the exact source of the reimbursement does not serve to exculpate her from a violation of the Act. See MUR 2071

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(Gary and Vicki Slavens). It is clear that she permitted her name to be used to make a contribution, and that she was reimbursed by a second party for her contribution. Accordingly, this Office intends to forward a brief addressing both spouses' contributions and recommending to the Commission findings of probable cause to believe.

Anthony J. Douglas

At issue is a $430, a $50, and a $20 contribution to the Townsend Committee. Initial notice was sent to Respondent on June 20, 1988. Though there was no forthcoming response from Mr. Douglas, this Office assumed notice as the notification was never returned as improperly addressed. On July 8, 1991, this Office sent by certified mail a notice advising Respondent that the matter was proceeding to the next stage of the enforcement process. This second notice was returned to the Commission as incorrectly addressed. Attempts to locate a current mailing address for Respondent proved fruitless. To date there has been no forthcoming response from Mr. Douglas.

As discussed, there is no clear evidence of any reimbursement scheme as concerns the employee contributions to the Townsend Committee. Respondent's $430 and $50 contributions were made on the same date, October 6, 1986.[8] While the making of contributions in this manner is uncommon, this pattern alone does not suggest that they reimbursed. Moreover, there is no direct evidence of reimbursement. Accordingly, in the absence

8. The date of the $20 contribution is unknown. The three contributions total $500.

9304353275 2

of any additional evidence, this Office intends to forward a brief recommending that the Commission find no probable cause to believe Respondent was reimbursed for his contributions.

Kelly Ramsey

At issue is a $200 contribution to The Kerry Committee, a $1,000 contribution to the Carter Committee, and a $50 contribution to the Townsend Committee. Initial notice was sent to Respondent on June 20, 1988. Though there was no forthcoming response from Mr. Ramsey, as was the case with Mr. Douglas, this Office assumed notice as the notification was never returned as improperly addressed. On July 8, 1991, this Office sent by certified mail a notice advising Respondent that the matter was proceeding to the next stage of the enforcement process. This second notice was returned to the Commission as incorrectly addressed. Attempts to locate a current mailing address for respondent proved fruitless. To date there has been no forthcoming response from Mr. Ramsey.

Respondent's name appears on the Kerry List with an accompanying notation for $200, the amount of his contribution to the Kerry Committee. This Office believes the evidence demonstrates that there is probable cause to believe that Respondent was reimbursed for his contribution to The Kerry Committee.

Further evidence suggests that Respondent was likewise reimbursed for his contributions to the Carter Committee. Along with Respondent, the Commission made reason to believe findings against nine other individuals in connection with contributions

9304353275 3

to the Carter Committee. Of these nine individuals eight have responded. All responses contain an admission of reimbursement. In light of the evidence of widespread reimbursement concerning this episode, and in the absence of evidence to the contrary, there is probable cause to believe Respondent was reimbursed for his contribution to the Carter Committee. Conversely, in light of the previously discussed lack of evidence of wide-spread reimbursement concerning employee contributions to the Townsend Committee, and the absence of any evidence indicating Respondent's reimbursement for his contribution, there is no probable cause to believe Respondent was reimbursed for his contribution to the Townsend Committee.

This Office intends to forward a brief recommending to the Commission findings of probable cause to believe Mr. Ramsey was reimbursed for his contributions to The Kerry Committee and the Carter Committee and no probable cause to believe Respondent was reimbursed for his contribution to the Townsend Committee.

Edward Herrera

At issue is a $100 contribution to the Carter Committee and a $50 contribution to the Kerry Committee. Respondent admits being reimbursed for the listed contributions. However, in light of the negligible amounts involved in Respondent's contributions, this Office recommends that the Commission take no further action against Respondent and close the file as concerns him.

Dennis Blackburn

At issue is a $1,000 contribution to AWH. Respondent

9304353275 4

admits being reimbursed for the contribution. Accordingly, this Office intends to recommend that the Commission find probable cause to believe Respondent was reimbursed for his contribution.

Court Shannon

At issue are the following contributions:

Amount of Contribution	Date of Contribution	Recipient Committee
$ 500	2/6/84	AWH
500	10/11/84	Cranston for President[9]
1,000	11/7/84	The Bradford Committee
2,000	4/11/86	The Kerry Committee[10]
1,000	5/27/86	The Carter Committee
1,000	10/6/86	The Townsend Committee
2,000	10/31/86	Committee for Tim Wirth, Inc.[11]
750	12/3/86	FGH

In his response Mr. Shannon admitted being reimbursed for all of the listed contributions except for the $1,000 contribution to the Townsend Committee. At the same time respondent requested pre-probable cause conciliation. The Commission, on this Office's recommendation, denied the request as being premature as the investigation was still open. The investigation as to the contribution reimbursement scheme has since been completed. This Office deems it appropriate to enter into pre-probable cause conciliation with Respondent at this time. In light of Respondent's admission to all but the contribution to the

9. The Commission did not find reason to believe concerning this contribution. Instead, Respondent in his response to the Commission's notification volunteered this information.

10. This amount includes two contributions of $1,000 each to the primary and general elections.

11. $1,000 of this contribution was refunded by the Committee.

2304353275 5

Townsend Committee and the lack of evidence of reimbursements concerning the same, this Office finds Respondent's denial credible and, accordingly, does not intend to include this contribution as part of the conciliation. Therefore, this Office recommends that the Commission enter into pre-probable cause conciliation with Mr. Shannon.

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III. RECOMMENDATIONS

1. Take no further action against George Stuart Karl, Elizabeth Baughman, Steven J. Bornstein, Edward Herrera, and Harold Weitzberg and close the file as it pertains to them.

2. Enter into pre-probable cause conciliation with Court Shannon at this time.

3. Approve the attached conciliation agreement and appropriate letters.

10-23-91
Date

LM Noble (JG)
Lawrence M. Noble
General Counsel

Attachment:
1. Contribution Schedule
2. Conciliation Agreement (1)

Staff assigned: Jose M. Rodriguez

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/BONNIE J. FAISON
COMMISSION SECRETARY

DATE: OCTOBER 28, 1991

SUBJECT: MUR 2583 - GENERAL COUNSEL'S REPORT
DATED OCTOBER 24, 1991.

The above-captioned document was circulated to the Commission on Thursday, October 24, 1991 at 4:00 p.m.

Objection(s) have been received from the Commissioner(s) as indicated by the name(s) checked below:

Commissioner Aikens	
Commissioner Elliott	XXX
Commissioner Josefiak	
Commissioner McDonald	
Commissioner McGarry	
Commissioner Thomas	

This matter will be placed on the meeting agenda for Tuesday, November 5, 1991.

Please notify us who will represent your Division before the Commission on this matter.

9304353275 7

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
George Stuart Karl, Elizabeth Baughman, Dennis Blackburn, Patricia Bonham, Robert W. Bonham, Steven J. Bornstein, Anthony J. Douglas, Edward Herrera, Jeff Jenest, Abraham Kantzabedian, Rama Middel, Robynne Phillipsen, Kelly Ramsey, Court Shannon, George Unwin, Alison Weir, Betty Ann Weir, Harold Weitzberg.	)	MUR 2583

9304353275 8

CERTIFICATION

I, Delores Harris, recording secretary of the Federal Election Commission executive session on November 5, 1991, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2583:

1. Take no further action against George Stuart Karl, Elizabeth Baughman, Steven J. Bornstein, Edward Herrera, Harold Weitzberg and Patricia Bonham and close the file as it pertains to them.

2. Enter into pre-probable cause conciliation with Court Shannon at this time.

3. Approve the conciliation agreement and appropriate letters, as recommended in the General Counsel's report dated October 23, 1991.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

December 8, 1991
Date

Delores Harris
Delores Harris
Administrative Assistant

2304353275 59

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 27, 1991

Donald R. Wager, Esq.
Suite 1000
10920 Wilshire Blvd.
Los Angeles, CA 90024

RE: MUR 2583
Harold Weitzberg

Dear Mr. Wager:

On June 20, 1988, your client, Harold Weitzberg, was notified that the Federal Election Commission found reason to believe that he violated 2 U.S.C. 441f. On July 11 and 18, 1988, you submitted responses to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on November 5, 1991, to take no further action against your client, and closed the file as it pertains to him. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

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. In the event your client wishes to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

The Commission reminds your client that contributions made at the behest of another and subsequently reimbursed by that individual are in violation of 2 U.S.C. § 441f. Mr. Weitzberg should take caution to insure that this activity does not occur in the future.

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If you have any questions, please contact Jose M. Rodriguez, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

Lois G. Lerner (JB)

BY: Lois G. Lerner
Associate General Counsel

9304353276 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 27, 1991

Edward Herrera
5027 E. Tango Circle
Anaheim, CA 92807

RE: MUR 2583

Dear Mr. Herrera:

On June 20, 1988, you were notified that the Federal Election Commission found reason to believe that you violated 2 U.S.C. 441f. On July 18, 1988, you submitted a response to the Commission's reason to believe finding.

On July 8, 1991, you were informed that, having conducted an investigation in this matter, the Office of the General Counsel was prepared to move to the next stage of the enforcement process.

After considering the circumstances of the matter, the Commission determined on November 5, 1991, to take no further action against you, and closed the file as it pertains to you. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

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. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

The Commission reminds you that contributions made at the behest of another and subsequently reimbursed by that individual are in violation of 2 U.S.C. § 441f. You should take caution to insure that this activity does not occur in the future.

9304353276 2

If you have any questions, please contact Jose M. Rodriguez, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

Lois G. Lerner (JB)

BY: Lois G. Lerner
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 27, 1991

Steven J. Bornstein
28 Avenue 28th
Venice, CA 90291

RE: MUR 2583

Dear Mr. Bornstein:

On June 20, 1988, you were notified that the Federal Election Commission found reason to believe that you violated 2 U.S.C. 441f. On July 1, 1988, and July 22, 1991, you submitted responses to the Commission's reason to believe finding.

On July 8, 1991, you were informed that, having conducted an investigation in this matter, the Office of the General Counsel was prepared to move to the next stage of the enforcement process.

After considering the circumstances of the matter, the Commission determined on November 5, 1991, to take no further action against you, and closed the file as it pertains to you. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

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. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

The Commission reminds you that contributions made at the behest of another and subsequently reimbursed by that individual are in violation of 2 U.S.C. § 441f. You should take caution to insure that this activity does not occur in the future.

2304353276 4

If you have any questions, please contact Jose M. Rodriguez, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

Lois G. Lerner (SB)

BY: Lois G. Lerner
Associate General Counsel

23043532765

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 27, 1991

Laurie S. Fulton, Esq.
Williams & Connolly
839 Seventeenth Street, N.W.
Washington, D.C. 20006

RE: MUR 2583
George Stuart Karl, Jr.

Dear Ms. Fulton:

On March 4, 1988, your client, George Stuart Karl, Jr., was notified that the Federal Election Commission found reason to believe that he knowingly and willfully violated 2 U.S.C. §§ 441a(a)(1)(A), 441a(a)(3), 441b(a), and 441f.

In consideration of the recent development in the matter, the Commission determined on November 5, 1991, to take no further action against Mr. Karl, and closed the file as it pertains to him. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

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. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

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If you have any questions, please contact Jose M. Rodriguez, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

Lois G. Lerner (JB)

BY: Lois G. Lerner
Associate General Counsel

93043532767

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1991

Patricia Bonham
219 Grant Street
Newport Beach, CA 92663

RE: MUR 2583

Dear Ms. Bonham:

On June 20, 1988, you were notified that the Federal Election Commission found reason to believe that you violated 2 U.S.C. 441f.

On July 8, 1991, you were informed that, having conducted an investigation in this matter, the Office of the General Counsel was prepared to move to the next stage of the enforcement process.

After considering the circumstances of the matter, the Commission determined on November 5, 1991, to take no further action against you, and closed the file as it pertains to you. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

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. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

The Commission reminds you that contributions made at the behest of another and subsequently reimbursed by that individual are in violation of 2 U.S.C. § 441f. You should take caution to insure that this activity does not occur in the future.

9304353276 8

If you have any questions, please contact Jose M. Rodriguez, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304353276 69

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 27, 1991

Jeffrey M. Ettinger, Esq.
2030 East University Drive
Carson, CA 90220

RE: MUR 2583
Court Shannon

Dear Mr. Ettinger:

On June 14, 1988, the Federal Election Commission found reason to believe that your client, Court Shannon, violated 2 U.S.C. § 441f. On February 6, 1989, you were informed of the Commission's denial of your request for pre-probable cause conciliation as premature. Having completed its investigation, on November 5, 1991, the Commission determined to grant your request and enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your client agrees with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, 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 arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Jose M. Rodriguez, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

Lois G. Lerner (98)

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

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OFFICE OF GENERAL COUNSEL

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 5, 1991

POSTMASTER
Irvine, CA
92714

MUR 2583

ADDRESS INFORMATION REQUEST

Pursuant to 39 C.F.R. § 265.6(d)(1), please furnish this agency with a new address, if available, for the individual or entity listed below, or verify whether the address given below is one at which mail for this individual or entity is currently being delivered.

NAME: Anthony J. Douglas

LAST KNOWN ADDRESS: 127 Greenfield
Irvine, CA 92714

Under 39 C.F.R. § 265.8(g)(5)(i), we request a waiver of fees. In this connection I hereby certify that the Federal Election Commission, an agency of the U.S. Government, requires the information requested above in the performance of its official duties, and that all other known sources for obtaining it have been exhausted. A return envelope is enclosed for your convenience.

Lois G. Lerner
Associate General Counsel

FOR POST OFFICE USE ONLY

( ) Mail is Delivered to Above Address
(X) Moved, left no forwarding address over 1 year
( ) No such address
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IRVINE, CA NOV 14 1991 USPS

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 5, 1991

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OFFICE OF GENERAL COUNSEL

91 NOV 18 PM 3:34

POSTMASTER

Tustin, CA

92680

MUR 2583

ADDRESS INFORMATION REQUEST

Pursuant to 39 C.F.R. § 265.6(d)(1), please furnish this agency with a new address, if available, for the individual or entity listed below, or verify whether the address given below is one at which mail for this individual or entity is currently being delivered.

NAME: Kelly Ramsey

LAST KNOWN ADDRESS: 13802 Tustin East Drive

Tustin, CA 92680

Under 39 C.F.R. § 265.8(g)(5)(i), we request a waiver of fees. In this connection I hereby certify that the Federal Election Commission, an agency of the U.S. Government, requires the information requested above in the performance of its official duties, and that all other known sources for obtaining it have been exhausted. A return envelope is enclosed for your convenience.

Lois G. Lerner
Associate General Counsel

FOR POST OFFICE USE ONLY

( ) Mail is Delivered to Above Address
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New Address : Forwarding Order expired

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 5, 1991

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OFFICE OF GENERAL COUNSEL

91 NOV 19 PM 3:21

POSTMASTER

El Toro, CA

92630

MUR 2583

ADDRESS INFORMATION REQUEST

Pursuant to 39 C.F.R. § 265.6(d)(1), please furnish this agency with a new address, if available, for the individual or entity listed below, or verify whether the address given below is one at which mail for this individual or entity is currently being delivered.

NAME: Elizabeth Baughman

LAST KNOWN ADDRESS: 22261 Vista Verde

El Toro, CA 92630

Under 39 C.F.R. § 265.8(g)(5)(i), we request a waiver of fees. In this connection I hereby certify that the Federal Election Commission, an agency of the U.S. Government, requires the information requested above in the performance of its official duties, and that all other known sources for obtaining it have been exhausted. A return envelope is enclosed for your convenience.

Lois G. Lerner
Associate General Counsel

FOR POST OFFICE USE ONLY

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 5, 1991

POSTMASTER

Costa Mesa, CA

92627

RECEIVED
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OFFICE OF GENERAL COUNSEL

91 NOV 13 PM 3:19

MUR 2583

ADDRESS INFORMATION REQUEST

Pursuant to 39 C.F.R. § 265.6(d)(1), please furnish this agency with a new address, if available, for the individual or entity listed below, or verify whether the address given below is one at which mail for this individual or entity is currently being delivered.

NAME: Elizabeth Baughman

LAST KNOWN ADDRESS: 2231 A-4 Pacific Avenue

Costa Mesa, CA 92627

Under 39 C.F.R. § 265.8(g)(5)(i), we request a waiver of fees. In this connection I hereby certify that the Federal Election Commission, an agency of the U.S. Government, requires the information requested above in the performance of its official duties, and that all other known sources for obtaining it have been exhausted. A return envelope is enclosed for your convenience.

Lois G. Lerner
Associate General Counsel

FOR POST OFFICE USE ONLY

(X) Mail is Delivered to Above Address
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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

December 10, 1991

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

SUBJECT: MUR 2583
Elizabeth Baughman

On November 5, 1991, the Commission decided to take no further action against Elizabeth Baughman in connection with a possible violation of 2 U.S.C. § 441f. Underlying the Commission's determination was in part this Office's representation that Respondent was inaccessible and had not been properly notified of the Commission's reason to believe findings in that all notifications sent to her known addresses were returned as undeliverable. In response to this Office's most recent efforts at obtaining a current address for Respondent, however, the Costa Mesa, CA, postmaster confirmed one of the addresses used to notify respondent as current. This Office feels it is still appropriate to take no further action against Respondent considering the advanced stage of the matter, the negligible amount involved in the violation ($250), and Ms. Baughman's status as a secretarial employee. Consequently, this Office does not recommend that the Commission reopen the matter as to Ms. Baughman.

Staff Assigned: Jose M. Rodriguez

2304353275

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BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of	)	
	)	
Dennis Blackburn, Robert W. Bonham, Anthony J. Douglas, Jeff Jenest, Abraham Kantzabedian, Rama Middel, Robynne Phillipsen, Kelly Ramsey, George Unwin, Alison Weir, Betty Ann Weir	)	MUR 2583

GENERAL COUNSEL'S REPORT

The Office of the General Counsel is prepared to close the investigation in this matter as to Dennis Blackburn, Robert W. Bonham, Anthony J. Douglas, Jeff Jenest, Abraham Kantzabedian, Rama Middel, Robynne Phillipsen, Kelly Ramsey, George Unwin, Alison Weir, and Betty Ann Weir, based on the assessment of the information presently available.

12/20/91
Date

Lawrence M. Noble
General Counsel

9304353277 6

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91 DEC 23 PM 4:18

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

December 23, 1991

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

SUBJECT: MUR 2583

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 as it relates to Dennis Blackburn, Robert W. Bonham, Jeff Jenest, Abraham Kantzabedian, Rama Middel, Robynne Phillipsen, Alison Weir, and Betty Ann Weir. A copy of these briefs and letters notifying the respondents of the General Counsel's intent to recommend to the Commission findings of probable cause to believe and no probable cause to believe were mailed on December 23, 1991. Following receipt of the respondents' reply to this notice, this Office will make a further report to the Commission.

Attachments
1. Briefs - 8
2. Letters to respondents

2304353277

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1991

Alison Weir
177 Riverside Ave.
Newport Beach, CA 92663-4018

RE: MUR 2583

Dear Ms. Weir:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on June 14, 1988, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441f, and instituted an investigation in this matter.

On July 8, 1991, you were informed that, having conducted an investigation in this matter, the Office of the General Counsel was prepared to move to the next stage of the enforcement process.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Jose M. Rodriguez, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Brief

9304353277 9

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Alison Weir) MUR 2583

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

This matter was initiated by the Federal Election Commission (the "Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2). The Commission considered the involvement and possible culpability of certain individuals in allowing their names to be used for contributions to federal candidates by others. On June 14, 1988, the Commission found reason to believe that Alison Weir ("Respondent") had made a contribution to a federal candidate which was possibly reimbursed by Stuart Karl, or corporate entities controlled by Mr. Karl, in violation of 2 U.S.C. § 441f.

II. ANALYSIS

Section 441f of Title 2, United States Code, makes it unlawful for any person to make a contribution in the name of another or for any person to knowingly permit his or her name to be used for such purpose.

The Commission found reason to believe that Respondent was reimbursed by Mr. Karl for a June 1, 1984, contribution of $500 to Americans With Hart, Inc. ("AWH"). Respondent has

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consistently denied both making and being reimbursed for any such contribution, and in a recent submission reiterated her claim that she has no recollection of making the contribution at issue, adding that she believes her name may have been used without her knowledge or consent. Conclusive evidence, however, belies Respondent's assertion that her name was used without her knowledge. Specifically, Respondent's signature appears on the $500 contribution check, dated May 24, 1984, made payable to AWH. Moreover, the available evidence also demonstrates a consistent reimbursement pattern concerning political contributions made by employees and non-employee personal friends of Stuart Karl during 1984. In fact, Betty Ann Weir, Respondent's mother and also a personal friend of Mr. Karl, admitted to being reimbursed by Mr. Karl for an earlier contribution to the same candidate.[1]

Considering Respondent's apparently less than candid submissions to the Commission concerning her making of the contribution, this Office does not find Ms. Alison Weir's denials to be credible. In light of that and the reimbursement scheme discussed above, this Office believes Respondent permitted her name to be used to effect a contribution in the name of another by receiving reimbursement for the contribution and, therefore, recommends that the Commission find probable cause to believe Respondent violated 2 U.S.C. § 441f.

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1. The contribution was for $1,000 and was made on February 6, 1984, several months prior to Respondent's contribution of June 1, 1984.

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III. GENERAL COUNSEL'S RECOMMENDATION

Find probable cause to believe that Alison Weir violated 2 U.S.C. § 441f.

12/20/91
Date

Lawrence M. Noble
General Counsel

2304335327832

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1991

Alvin S. Michaelson, Esq.
Michaelson & Levine
1901 Avenue of the Stars
Suite 2512
Los Angeles, CA 90067

RE: MUR 2583
Rama Middel

Dear Mr. Michaelson:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on March 1, 1988, the Federal Election Commission found reason to believe that your client, Rama Middel, violated 2 U.S.C. § 441f, and instituted an investigation in this matter.

On July 8, 1991, you were informed that, having conducted an investigation in this matter, the Office of the General Counsel was prepared to move to the next stage of the enforcement process.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Jose M. Rodriguez, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Brief

9304353274

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Rama Middel) MUR 2583

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

This matter was initiated by the Federal Election Commission (the "Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2). The Commission considered the involvement and possible culpability of certain individuals in allowing their names to be used for contributions to federal candidates by others. On March 1, 1988, the Commission found reason to believe that Rama Middel ("Respondent") had made contributions to federal candidates which were possibly reimbursed by her employer, Stuart Karl or corporate entities controlled by Mr. Karl, in violation of 2 U.S.C. § 441f.

II. ANALYSIS

Section 441f of Title 2, United States Code, makes it unlawful for any person to make a contribution in the name of another or for any person to knowingly permit his or her name to be used for such purpose.

The Commission found reason to believe that Respondent was

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reimbursed by her employer for the following contributions:

Amount of Contribution	Date of Contribution	Recipient Committee
$ 250	1/26/84	Americans With Hart, Inc.[1]
200	7/12/84	Americans With Hart, Inc.
50	1/1/85	Americans With Hart, Inc.
40	10/1/85	Americans With Hart, Inc.
250	11/6/84	Carol Ann Bradford for Congress
200	3/18/86	The Kerry Committee
500	5/27/86	Dave Carter for Congress
1,000	10/30/86	Committee for Tim Wirth, Inc.

Respondent has testified to having made and having been reimbursed for all contributions but the $200 contribution to The Kerry Committee and the $40 contribution to Americans With Hart, Inc. ("AWH").

While not specifically admitted, it appears that Ms. Middel was also reimbursed for these last two contributions. Ms. Middel testified to being reimbursed for all contributions solicited by Mr. Karl. See Deposition of Rama Middel at 66. Substantiating this statement, and further evidencing the reimbursement of the two contributions, is the appearance of Ms. Middel's name on a handwritten employee reimbursement schedule for contributions to The Kerry Committee and Ms. Middel's admission to being reimbursed for a contribution, also made in 1985, similar to her $40 contribution to AWH.

Ms. Middel has further testified to being the individual within the company relied upon by Mr. Karl to carry-out the

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1. As testified, the check was made out to "Friends of Gary Hart."

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reimbursement of employee contributions. Specifically, Ms. Middel testified to taking oral instruction from Mr. Karl regarding the employee and amount to be solicited. Ms. Middel related that she would write this information down on an envelope or a note pad and proceed to solicit the targeted employees. These employees would be asked to contribute the specified amount with the explicit understanding that they would be reimbursed for their contribution by Mr. Karl. The checks for the solicited contributions would be turned over to Ms. Middel who would send them to the appropriate campaigns. Within a few days of the contributions, Ms. Middel, again upon Mr. Karl's instructions, would withdraw cash from Mr. Karl's bank account, place the reimbursement amounts into individual envelopes and personally deliver these envelopes to the contributing employees. Having done this, she would tear up and throw away the reimbursement list she had previously made. See Id. at 75-77.

As is clear, Respondent had complete knowledge of and was instrumental in the reimbursement of the employee contributions. Additionally, though never testifying to having discussed the impropriety of the reimbursements with Mr. Karl, Respondent did testify to making a contribution in her name for Mr. Karl as he was "maxed-out" to a particular candidate. See Id. at 108. Moreover, Respondent testified that it was understood that any such reimbursements would be in cash "because you can't trace cash." See Id. at 112. The implication of Ms. Middel's testimony is that she was aware of the limits on an individual's federal political contributions and consequently was necessarily aware

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that the reimbursements were clandestine and intended to circumvent this limit in violation of federal law.

Respondent's admission and the available evidence demonstrates that Respondent permitted her name to be used to effect contributions in the name of another by receiving reimbursement for each contribution. Respondent has also assisted in the making of contributions in the name of another. Both these activities were conducted with the knowledge that they violated federal law. Therefore, this Office recommends that the Commission find probable cause to believe Respondent knowingly and willfully violated 2 U.S.C. § 441f.

III. GENERAL COUNSEL'S RECOMMENDATION

Find probable cause to believe that Rama Middel knowingly and willfully violated 2 U.S.C. § 441f.

12/20/91
Date

Lawrence M. Noble
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1991

Betty Ann Weir
177 Riverside Ave.
Newport Beach, CA 92663-4018

RE: MUR 2583

Dear Ms. Weir:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on June 14, 1988, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441f, and instituted an investigation in this matter.

On July 8, 1991, you were informed that, having conducted an investigation in this matter, the Office of the General Counsel was prepared to move to the next stage of the enforcement process.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Jose M. Rodriguez, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Brief

9304353279 20

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Betty Ann Weir) MUR 2583

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

This matter was initiated by the Federal Election Commission (the "Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2). The Commission considered the involvement and possible culpability of certain individuals in allowing their names to be used for contributions to federal candidates by others. On June 14, 1988, the Commission found reason to believe that Betty Ann Weir ("Respondent") had made contributions to federal candidates which were possibly reimbursed by Stuart Karl, or corporate entities controlled by Mr. Karl, in violation of 2 U.S.C. § 441f.

II. ANALYSIS

Section 441f of Title 2, United States Code, makes it unlawful for any person to make a contribution in the name of another or for any person to knowingly permit his or her name to be used for such purpose.

The Commission found reason to believe that Respondent was reimbursed by Mr. Karl for a February 6, 1984, contribution of $1,000 to Americans With Hart, Inc., and a November 7, 1984,

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contribution of $1,000 to Carol Ann Bradford for Congress. In response to this Office's interrogatories Respondent admits to having made a $1,000 contribution to Americans With Hart, Inc., and to having been reimbursed by Mr. Karl for the same. Despite having been asked, however, Respondent neither confirmed nor denied being reimbursed for her contribution to Carol Ann Bradford for Congress.

Responses from other individuals concerning whom the Commission made similar findings in connection with their contributions to Carol Ann Bradford for Congress evidence a consistent reimbursement pattern. Specifically, three of the four similarly situated respondents have admitted to being reimbursed for their contributions to the Committee. The fourth respondent has generally denied being reimbursed for any contributions. Moreover, Mr. Karl stated to the Commission that all such contributions were reimbursed. Therefore, the available evidence demonstrates a pattern of reimbursments, indicating that Respondent was reimbursed for her contribution to Carol Ann Bradford for Congress.

Respondent's admission and the available evidence demonstrate that Respondent permitted her name to be used to effect contributions in the name of another by receiving reimbursements for each contribution. Therefore, this Office recommends that the Commission find probable cause to believe Ms. Weir violated 2 U.S.C. § 441f.

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III. GENERAL COUNSEL'S RECOMMENDATION

Find probable cause to believe that Betty Ann Weir violated 2 U.S.C. § 441f.

12/20/91
Date

Lawrence M. Noble
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1991

Dennis Blackburn
19141 Woodfarm Terrace
Irvine, CA 92714

RE: MUR 2583

Dear Mr. Blackburn:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on March 14, 1988, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441f, and instituted an investigation in this matter.

On July 8, 1991, you were informed that, having conducted an investigation in this matter, the Office of the General Counsel was prepared to move to the next stage of the enforcement process.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Jose M. Rodriguez, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Brief

9304353279795

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Dennis Blackburn) MUR 2583

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

This matter was initiated by the Federal Election Commission (the "Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2). The Commission considered the involvement and possible culpability of certain individuals in allowing their names to be used for contributions to federal candidates by others. On June 14, 1988, the Commission found reason to believe that Dennis Blackburn ("Respondent") had made a contribution to a federal candidate which was possibly reimbursed by his employer, Stuart Karl or corporate entities controlled by Mr. Karl, in violation of 2 U.S.C. § 441f.

II. ANALYSIS

Section 441f of Title 2, United States Code, makes it unlawful for any person to make a contribution in the name of another or for any person to knowingly permit his or her name to be used for such purpose.

The Commission found reason to believe that Respondent was reimbursed by his employer for a February 6, 1984, contribution for $1,000 to Americans With Hart, Inc. In response to this Office's interrogatories Respondent admits to having made the

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above mentioned contribution and to having been reimbursed by Mr. Karl for the same. Specifically, Mr. Blackburn states that he was reimbursed by a corporate check, from Karl Video Corporation, which he wrote to himself with Mr. Karl's knowledge, thereby disguising the true origin of the contributed funds.

Respondent has admitted to permitting his name to be used to effect a contribution in the name of another by receiving reimbursement for the contribution. Therefore, this Office recommends that the Commission find probable cause to believe Respondent violated 2 U.S.C. § 441f.

III. GENERAL COUNSEL'S RECOMMENDATION

Find probable cause to believe that Dennis Blackburn violated 2 U.S.C. § 441f.

12/10/91
Date

Lawrence M. Noble
General Counsel

9304353279797

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1991

Abraham Kantzabedian
219 Grant Street
Newport Beach, CA 92663

RE: MUR 2583

Dear Mr. Kantzabedian:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on March 1, 1988, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441f, and instituted an investigation in this matter.

On July 8, 1991, you were informed that, having conducted an investigation in this matter, the Office of the General Counsel was prepared to move to the next stage of the enforcement process.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Jose M. Rodriguez, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Brief

9304353279 9

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Abraham Kantzabedian) MUR 2583

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

This matter was initiated by the Federal Election Commission (the "Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2). The Commission considered the involvement and possible culpability of certain individuals in allowing their names to be used for contributions to federal candidates by others. On March 1, 1988, Commission found reason to believe that Abraham Kantzabedian had made a contribution to a federal candidate which was possibly reimbursed by his employer, Stuart Karl or corporate entities controlled by Mr. Karl, in violation of 2 U.S.C. § 441f.

II. ANALYSIS

Section 441f of Title 2, United States Code, makes it unlawful for any person to make a contribution in the name of another or for any person to knowingly permit his or her name to be used for such purpose.

The Commission found reason to believe that Respondent was reimbursed by Mr. Karl for a February 6, 1984, contribution of a $1,000 to Americans With Hart, Inc. Mr. Kantzabedian has admitted under oath to having made the above mentioned contribution and to having been reimbursed by Mr. Karl for the same, thereby

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disguising the true origin of the contributed funds. See Deposition of Abraham Kantzabedian at 71.

Respondent has admitted to permitting his name to be used to effect a contribution in the name of another by receiving reimbursement for the contribution. Therefore, this Office recommends that the Commission find probable cause to believe Respondent violated 2 U.S.C. § 441f.

III. GENERAL COUNSEL'S RECOMMENDATION

Find probable cause to believe that Abraham Kantzabedian violated 2 U.S.C. § 441f.

12/20/91
Date

Lawrence M. Noble
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1991

John D. Vandevelde, Esq.
Talcott, Lightfoot, Vandevelde,
Woehrle & Sadowsky
Thirteenth Floor
655 South Hope Street
Los Angeles, CA 90017

RE: MUR 2583
Jeff Jenest

Dear Mr. Vandevelde:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on June 14, 1988, the Federal Election Commission found reason to believe that your client, Jeff Jenest, violated 2 U.S.C. § 441f, and instituted an investigation in this matter.

On July 8, 1991, you were informed that, having conducted an investigation in this matter, the Office of the General Counsel was prepared to move to the next stage of the enforcement process.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

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If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Jose M. Rodriguez, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Brief

cc: Robert M, Talcott, Esq.

9304353280803

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Jeff Jenest) MUR 2583

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

This matter was initiated by the Federal Election Commission (the "Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2). The Commission considered the involvement and possible culpability of certain individuals in allowing their names to be used for contributions to federal candidates by others. On June 14, 1988, the Commission found reason to believe that Jeff Jenest ("Respondent") had made a contribution to a federal candidate which was possibly reimbursed by his employer, Stuart Karl or corporate entities controlled by Mr. Karl, in violation of 2 U.S.C. § 441f.

In response to this Office's interrogatories, Respondent asserted that he was not reimbursed for the contribution he had made to a federal candidate and, thus, did not violate 2 U.S.C. § 441f

II. ANALYSIS

As disclosed in the public records, Respondent made a contribution to a federal candidate. Respondent has asserted that he was not reimbursed for this contribution, and that no reimbursement was offered him. This Office has not discovered

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evidence showing that Respondent had in fact allowed his name to be used to effect a contribution in the name of another in violation of 2 U.S.C. § 441f.

III. GENERAL COUNSEL'S RECOMMENDATION

In the absence of evidence contrary to Respondent's assertion, this Office recommends that the Commission find no probable cause to believe that Jeff Jenest violated 2 U.S.C. § 441f.

12/20/91
Date

Lawrence M. Noble
General Counsel

9304355328805

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1991

Robynne Phillipsen
6165 Palau Street
Cypress, CA 90603

RE: MUR 2583

Dear Ms. Phillipsen:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on June 14, 1988, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441f, and instituted an investigation in this matter.

On July 8, 1991, you were informed that, having conducted an investigation in this matter, the Office of the General Counsel was prepared to move to the next stage of the enforcement process.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Jose M. Rodriguez, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Brief

9304353280 7

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Robynne Phillipson) MUR 2583

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

This matter was initiated by the Federal Election Commission (the "Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2). The Commission considered the involvement and possible culpability of certain individuals in allowing their names to be used for contributions to federal candidates by others. On June 14, 1988, the Commission found reason to believe that Robynne Phillipson ("Respondent") had made a contribution to a federal candidate which was possibly reimbursed by her employer, Stuart Karl or corporate entities controlled by Mr. Karl, in violation of 2 U.S.C. § 441f.

In response to this Office's interrogatories, Respondent asserted that she was not reimbursed for the contribution she had made to a federal candidate and, thus, did not violate 2 U.S.C. § 441f

II. ANALYSIS

As disclosed in the public records, Respondent made a contribution to a federal candidate. Respondent has asserted that she was not reimbursed for this contribution, and that no reimbursement was offered her. This Office has not discovered

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evidence showing that Respondent had in fact allowed her name to be used to effect a contribution in the name of another in violation of 2 U.S.C. § 441f.

III. GENERAL COUNSEL'S RECOMMENDATION

In the absence of evidence contrary to Respondent's assertion, this Office recommends that the Commission find no probable cause to believe that Robynne Phillipson violated 2 U.S.C. § 441f.

12/10/91
Date

Lawrence M. Noble
General Counsel

9304353280 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1991

Jerry Nicholson, Esq.
Law Office of Jerry Nicholson
5375 East Second Street
Suite One
Long Beach, CA 90803

RE: MUR 2583
Robert W. Bonham

Dear Mr. Nicholson:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on June 14, 1988, the Federal Election Commission found reason to believe that your client, Robert W. Bonham, violated 2 U.S.C. § 441f, and instituted an investigation in this matter.

On July 8, 1991, you were informed that, having conducted an investigation in this matter, the Office of the General Counsel was prepared to move to the next stage of the enforcement process.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Jose M. Rodriguez, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Brief

2304355328311

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Robert W. Bonham) MUR 2583

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

This matter was initiated by the Federal Election Commission (the "Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2). The Commission considered the involvement and possible culpability of certain individuals in allowing their names to be used for contributions to federal candidates by others. On June 14, 1988, the Commission found reason to believe that Robert W. Bonham ("Respondent") had made contributions to federal candidates which were possibly reimbursed by his employer, Stuart Karl or corporate entities controlled by Mr. Karl, in violation of 2 U.S.C. § 441f.

In response to this Office's interrogatories, Respondent asserted that he was not reimbursed for the contributions he had made to federal candidates and, thus, did not violate 2 U.S.C. § 441f

II. ANALYSIS

As disclosed in the public records, Respondent made contributions to federal candidates. Respondent has asserted that he was not reimbursed for these contributions, and that no reimbursement was offered him. This Office has not discovered

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evidence showing that Respondent had in fact allowed his name to be used to effect contributions in the name of another in violation of 2 U.S.C. § 441f.

III. GENERAL COUNSEL'S RECOMMENDATION

In the absence of evidence contrary to Respondent's assertions, this Office recommends that the Commission find no probable cause to believe that Robert W. Bonham violated 2 U.S.C. § 441f.

12/20/91
Date

Lawrence M. Noble
General Counsel

2304353281 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 7, 1992

Jeffrey M. Ettinger, Esq.
2030 East University Drive
Carson, CA 90220

RE: MUR 2583
Court Shannon

Dear Mr. Ettinger:

On November 27, 1991, you were notified that, at your request, the Federal Election Commission determined to enter into negotiations directed toward reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. On that same date you were sent a conciliation agreement offered by the Commission in settlement of this matter.

Please note that conciliation negotiations entered into prior to a finding of probable cause to believe are limited to a maximum of 30 days. To date, you have not responded to the proposed agreement. The 30 day period for negotiations has expired. Unless we receive a response from you within five days, this Office will consider these negotiations terminated and will proceed to the next stage of the enforcement process.

Should you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jose M. Rodriguez
Attorney

9304353281 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 8, 1992

Alison Weir
177 Riverside Ave.
Newport Beach, CA 92663-4018

RE: MUR 2583

Dear Ms. Weir:

As requested, please find enclosed a copy of the check referred to in the General Counsel's Brief dated December 20, 1991. Please note that only a copy of the front of the check is enclosed as this is all that was provided to the Commission by the recipient committee.

Should you have any questions, please contact me at (202) 219-3690.

Sincerely

Jose M. Rodriguez
Attorney

Enclosure

2304353281 5

9-C 4612
FEDERAL ELECTION COMMISSION
92 JAN -8 AM 10:40

MICHAELSON & LEVINE
ATTORNEYS AT LAW
1901 AVENUE OF THE STARS, SUITE 1708
LOS ANGELES, CALIFORNIA 90067
TELEPHONE (213) 278-4984
FAX (213) 286-9969

*ALVIN S. MICHAELSON
JANET I. LEVINE
*A PROFESSIONAL CORPORATION

92 JAN -8 PM 3:29

January 3, 1992

Jose M. Rodriguez
General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 2583
Rama Middel

Dear Mr. Rodriguez:

As I told you in our conversation today, on December 30, 1991, this office received your December 23, 1991, letter regarding the above-captioned matter. As you are aware, the alleged violations occurred many years ago and no significant action has been taken in this matter since 1988.

In order for me to accurately respond to the brief of the General Counsel, it is necessary to review the file and communicate with my client, Ms. Middel. Due to holiday vacation schedules and the need to completely refamiliarize myself with this case, I need a 20-day extension of time within which to respond to the brief of the General Counsel. If such extension is granted I will have my brief to the Secretary of the Commission no later than Monday, February 3, 1992.

Thank you in advance for your cooperation in this regard. Should you have any questions, please do not hesitate to contact me.

Very truly yours,

MICHAELSON & LEVINE

Alvin S. Michaelson

ASM:lh

2300435328116

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

January 10, 1992

Alvin S. Michaelson, Esq.
Michaelson & Levine
1901 Avenue of the Stars
Suite 1708
Los Angeles, CA 90067

RE: MUR 2583
Rama Middel

Dear Mr. Michaelson:

This is in response to your letter dated January 3, 1992, which we received on January 8, 1992, requesting an extension until February 3, 1992, to respond to the General Counsel's Brief. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on February 3, 1992.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

José M. Rodriguez
Attorney

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86 C 4035

LAW OFFICES
TALCOTT, LIGHTFOOT, VANDEVELDE
WOEHRLE & SADOWSKY
THIRTEENTH FLOOR
655 SOUTH HOPE STREET
LOS ANGELES, CALIFORNIA 90017-3211
TELEPHONE: (213) 622-4750
TELECOPIER: (213) 622-2690

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
92 JAN -9 AM 10:59

ROBERT M. TALCOTT
MICHAEL J. LIGHTFOOT
JOHN D. VANDEVELDE
CARLA M. WOEHRLE
STEPHEN B. SADOWSKY
MARIA E. STRATTON
JOHN S. CROUCHLEY
JOHN P. MARTIN
MELISSA N. WIDDIFIELD
SEAN K. KENNEDY

OF COUNSEL AND
RESIDENT IN SACRAMENTO OFFICE
QUIN DENVIR
SUITE 250
555 CAPITOL MALL
SACRAMENTO, CALIFORNIA 95814
TELEPHONE (916) 448-8868
TELECOPIER (916) 448-8965

January 6, 1992

92 JAN 10 PM 3:13
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

Lois G. Lerner
Associate General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 2583
Jeff Jenest
Your letter dated December 23, 1991

Dear Ms. Lerner:

We received the above letter and the brief you had attached. We concur with your recommendation to the Commission and consequently do not plan to file a brief. Please notify us of the Commission's action in this matter.

Very truly yours,

TALCOTT, LIGHTFOOT, VANDEVELDE
WOEHRLE & SADOWSKY

JOHN D. VANDEVELDE

JDV:db

cc: Jeff Jenest
Steve Ross

2304353618

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 15, 1992

Jeffrey M. Ettinger, Esquire
P.O. Box 800
Austin, MN 55912

RE: MUR 2583
Court Shannon

Dear Mr. Ettinger:

In response to your telephone request yesterday, enclosed is a letter and conciliation agreement dated November 27, 1991 that was mailed to you. I understand you have moved to another state and did not receive the attached correspondence. Please contact Jose Rodriguez, the attorney responsible for this matter, upon your receipt of this letter.

Sincerely,

Jonathan Bernstein
Assistant General Counsel

Enclosure

9304353283819

JAN 13, 1992

RECEIVED
FEDERAL ELECTION COMMISSION
92 JAN 16 PM 12: 18

DEAR MR. RODRIGUES –

ON TUESDAY JAN. 7th I SPOKE WITH YOU REGUARDING MUR. 2583. I HAVE NOT RECEIVED THE INFORMATION YOU'VE SENT SO, I AM SUBMITTING THIS WRITTEN REQUEST FOR AN EXTENSION.

THANK YOU

Alison Weir

RECEIVED
FEDERAL ELECTION COMMISSION
92 JAN 16 PM 3: 38

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 22, 1992

Alison Weir
177 Riverside Ave.
Newport Beach, CA 92663-4018

RE: MUR 2583

Dear Ms. Weir:

This is in response to your letter dated January 13, 1992, which we received on January 16, 1992, requesting an extension of time in which to respond to the General Counsel's Brief. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due within ten days of receipt of this letter.

Additionally, enclosed please find a copy of the requested document and accompanying cover letter originally mailed to you on January 8, 1992.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jose M. Rodriguez
Attorney

Enclosure

9304353282 1

(MUR 2583) JANUARY 14, 1992

MR JOSE M. RODRIQUEZ
FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

DEAR SIR.

ENCLOSED
THIRTEEN COPIES OF MY RESPONSE AS
REQUESTED.

SINCERELY

Betty Ann Weiss

MUR 2583

92 JAN 22 AM 10:49

9304435328822

[redacted] JANUARY 14, 1992

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

DEAR SIR,

IN RESPONSE TO YOUR CORRESPONDENCE OF DECEMBER 1991.

AS STATED IN YOUR FIRST LETTER I DID MAKE A CHECK OUT TO AMERICANS WITH HART. STUART KARL ASKED ME IF I WOULD MAKE A DONATION TO GARY HART, AND I AM NOT SURE WHY I DID, FOR I HAVE NEVER "BEEN INTO POLITICS" IT MUST HAVE BEEN MR KARL'S CHARM.

I DO NOT RECALL MR KARL REIMBURSING ME, EVEN IF (AS STATED IN YOU LETTER) "STUART KARL STATED TO THE COMMISSION THAT ALL SUCH CONTRIBUTIONS WERE REIMBURSED".

CAROL ANN BRADFORD A NAME THAT IS NOT FAMILIAR TO ME, AND SO TO MY KNOWLEDGE, I DID NOT.. AND AT THIS POINT IN TIME I STILL DO NOT RECALL CONTRIBUTING TO MS. BRADFORD.

IN 1984 I WAS NOT AWARE OF 2 U.S.C. § 441 f. I KNOW IGNORANCE OF THE LAW IS NO EXCUSE. IT WAS NOT MY INTENTION TO VIOLATE 2 U.S.C § 441 f.

Betty Ann Weir

RECEIVED
FEDERAL ELECTION COMMISSION
JAN 22 PM 3:19
OFFICE OF GENERAL COUNSEL

MUR 2583

93043532823

MICHAELSON & LEVINE
ATTORNEYS AT LAW
1901 AVENUE OF THE STARS, SUITE 1708
LOS ANGELES, CALIFORNIA 90067
TELEPHONE (213) 278-4984
FAX (213) 286-9969

*ALVIN S. MICHAELSON
JANET I. LEVINE
*A PROFESSIONAL CORPORATION

RECEIVED
FEDERAL ELECTION COMMISSION
WASHINGTON
92 JAN 27 AM 9:40

January 24, 1992

VIA FEDERAL EXPRESS

FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 JAN 27 PM 3:38

Lawrence M. Noble,
General Counsel
Federal Election Commission
999 E Street, N.W.
6th Floor
Washington, D.C. 20463

Re: **MUR 2583**
Rama L. Middel

Dear Mr. Noble:

In accordance with your letter of December 23, 1991, enclosed please find three copies of the Response to your Brief in the above-captioned matter. I have, under separate cover, sent the original and ten copies of the Brief to the Secretary of the Commission.

Should you have any questions regarding the above, please do not hesitate to contact me.

Very truly yours,

MICHAELSON & LEVINE

Janet I. Levine

JIL:lh
Encl.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Rama Middel	)	MUR 2583

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 JAN 27 PM 3:39

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I.

INTRODUCTION

On December 20, 1991, the General Counsel to the Federal Election Commission, Lawrence M. Nobel, submitted the General Counsel's Brief in the above-captioned matter. The brief indicated that this matter "was initiated by the Federal Election Commission . . . pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities." It also indicated that on March 1, 1988, "the Commission found reason to believe that Rama Middel ('Respondent') had made contributions to federal candidates which were possibly reimbursed by her employer, Stuart Karl or corporate entities controlled by Mr. Karl, in violation of 2 U.S.C. § 441f."[1]

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[1] The General Counsel's brief begins by indicating that "[t]his matter was initiated by the Federal Election Commission (the 'Commission'), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities." The Brief does not mention that this matter, while initially investigated in 1988, lay dormant for four years, and it ignores

The General Counsel's Brief concludes that there is probable cause to believe that Rama Middel "knowingly and willfully violated 2 U.S.C. § 441f." Id. at 4. The General Counsel isolates eight instances of alleged misconduct. According to the General Counsel's Brief these alleged violations occurred between January 26, 1984, and October 30, 1986.

Ms. Middel hereby submits this brief. As is fully set forth below, it is inappropriate for the Federal Election Commission to make any finding of a violation by Ms. Middel on

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that the alleged violations are six to eight years old.

2 U.S.C. 437d provides that:

"The Commission has the power ---

. . .

(9) to conduct investigations and hearings expeditiously . . . ." (Emphasis added.)

It is well-established that an agency may not "unreasonably delay" an investigation. See Common Cause v. Federal Election Commission, 692 F.Supp. 1397, 1400 (D. D.C. 1988); Telecommunications Research & Action Center v. Federal Communications Comm'n, 750 F.2d 70, 80-81 (D.C. Cir. 1984) In the instant case, there is absolutely no basis for the Commission's lengthy delay in investigating this matter. The General Counsel's Brief indicates that on March, 1988, the Commission "found reason to believe that Ms. Middel had violated the federal election law." The brief does not cite to any evidence obtained after April, 1988. The four year delay between this finding and the submission of the Counsel's brief is inexcusable.

In such a delay, particularly with alleged violations predating the investigation by years, memories fade and witnesses disappear. Here, the key witness and indeed, key player, Stuart Karl, died in the delay period. In that period Ms. Middel made a new life for herself apart from Mr. Karl and his political affairs. To seek to impose punishment based on these old allegations almost a decade after they occur is patently unfair and unjust and constitutes an "unreasonable delay."

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both legal and equitable grounds. Factors in mitigation fully known to the General Counsel but completely omitted from the General Counsel's Brief, require that no finding of probable cause be made, but instead that the matter be dismissed forthwith. Further, the Commission and the General Counsel's less than expeditious conduct in this matter require that the matter be dismissed without any finding of a violation.

II.

THE ALLEGED VIOLATIONS

The General Counsel's Brief alleges that Ms. Middel violated 2 U.S.C. § 441f. That Section provides:

> "Contribution in name of another prohibited.
>
> No persons shall make a contribution in the name of another person or knowingly permit his name to be used to affect such contribution, and no person shall knowingly accept a contribution made by one person in the name of another person."

According to the General Counsel's Brief, Ms. Middel participated in eight such contributions ranging in size from $40.00 to $1,000.00. The Brief contends that she made the following contributions:

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Amount of Contribution	Date of Contribution	Recipient Committee
$ 250	01/26/84	Americans With Hart, Inc.
200	07/12/84	Americans With Hart, Inc.
50	01/01/85	Americans With Hart, Inc.
40	10/01/85	Americans With Hart, Inc.
250	11/06/84	Carol Ann Bradford for Congress
200	03/18/86	The Kerry Committee
500	05/27/86	Dave Carter for Congress
1,000	10/30/86	Committee for Tim Wirth, Inc.

According to the General Counsel, Ms. Middel admitted to making six of the eight contributions and the evidence, according to the General Counsel, confirms the other two contributions were made by Ms. Middel. The General Counsel's Brief indicates that Ms. Middel, after making these contributions, was reimbursed by Stuart Karl, her employer, in cash for those contributions. The Brief of the General Counsel indicates that these contributions were made by Ms. Middel with full knowledge that it constituted a violation of the law. In support of its allegations and conclusion the General Counsel's Brief relies exclusively on Ms. Middel's deposition. For the reasons set forth below, the General Counsel's conclusions are flawed.

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III.

STATEMENT OF FACTS[2]

[2] On April 11, 1988, and April 27, 1988, two attorneys for the Federal Election Commission, Jonathan Bernstock and Cecilia Jacoby deposed Rama L. Middel. The depositions were not limited in time or scope and the attorneys for the Commission were free to ask any questions they wished. At the conclusion of the second day, the attorneys for the Commission indicated that they would return to ask Ms. Middel further questions; they never did so. Ms. Middel, however, was always willing and able to provide

Rama Middel, the Respondent, has never had any personal interest in any federal, state or local election. She has never been politically oriented.[3] Rather, she was employed as the secretary to Stuart Karl, a man who enjoyed politics, and only as his secretary was she exposed to election politics.

Ms. Middel, at all pertinent times, was a young and relatively unschooled woman. Ms. Middel, after growing up in Orange County and receiving a high school diploma, took some college classes at Cypress Community College, a junior college. While in college Ms. Middel supported herself by cleaning houses. In 1977, she obtained a job as a secretary in a hospital; she worked as a medical secretary until October, 1983. As a secretary, Ms. Middel was trained to take orders and implement directions. In October of 1983, she began working at Karl Home Video. Stuart Karl was the head of Karl Video. Karl Home Video was an Orange County based business that produced videos such as the Jane Fonda fitness videos. Ms. Middel eventually became Mr. Karl's personal secretary; as such she was involved in answering the telephone and performing routine secretarial functions, as well as being responsible for calendaring and coordinating Mr. Karl's social, business, financial and political matters. She was

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whatever information was requested by the Commission. Indeed, Ms. Middel was, as is set forth herein, fully cooperative with all government bodies, and was instrumental in both the criminal and civil investigations.

[3] Ms. Middel has not been registered to vote for years. When she was last registered it was Republican; the last time she voted for President, she voted for Richard M. Nixon.

directly responsible to Mr. Karl.

In 1984, Karl Home Videos was purchased by Lorimar; it was then known as Karl-Lorimar Home Videos. Ms. Middel, after the acquisition, continued to work for Stuart Karl as his personal and business secretary. The only changes for her were not of substance. She was answerable to Mr. Karl and was responsible for implementing his orders. Mr. Karl had the right to fire her at any time. She was still just his secretary.

Mr. Karl was not an easy person to work for. He was always very demanding and intimidating, both to Ms. Middel and to others. He did not tolerate anyone that questioned his instructions or disagreed with him, and when people did not do as he instructed they were fired, berated or demoted. It was not uncommon for Mr. Karl to fire people on the spot, although, occasionally he would hire them back. Ms. Middel was not in a position to question Mr. Karl's directions as she was his personal secretary. Because Ms. Middel was directly under his control, she was more exposed to his demands.

Ms. Middel continued to work for Mr. Karl as his personal secretary at Karl-Lorimar Home Video until 1987, when Mr. Karl was fired from Lorimar. During Ms. Middel's employment as Karl's secretary, Mr. Karl was very involved in election politics, and was a major supporter of Gary Hart. Mr. Karl made contributions of time and money to Hart. During the period of time from 1984 and 1986, Ms. Middel would occasionally make contributions to political campaigns at the direction and order of Mr. Karl. When

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she did so, it was not for her personal interest, but rather at the direction of her boss who had the right to fire her at any time for any reason. Ms. Middel believed that if she did not make these contributions she would be fired.

Ms. Middel was reimbursed by Mr. Karl for the political contributions she made.

In 1987, there was an internal Lorimar investigation regarding Mr. Karl having a conflict of interest with Lorimar; as a result of this conflict of interest Mr. Karl was fired by Lorimar. When Mr. Karl left Lorimar he formed his own company; he continued to employ Rama Middel as his personal secretary. She remained as his personal secretary until September, 1987, when she left because he could no longer pay her salary and the circumstances of her employment became unbearable.

After Rama Middel stopped working for Mr. Karl, she began working with her husband, a shipwright (Marine carpenter). Ms. Middel took care of the books and the secretarial work for her husband and also assisted her husband in the physical labor, such as varnishing and painting boats. They worked together from 1987 until 1990; in March of 1990, Ms. Middel obtained a job as a secretary with an insurance company. She now works at the same insurance company, although, she recently completed some sales courses and obtained her license to sell insurance; she received a promotion to be an insurance salesman.

Ms. Middel has never in her life been accused or charged with a crime; she has never been involved in politics. When she

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worked with Mr. Karl, she found him a demanding but charismatic employer. She had no independent authority but, rather, was simply a secretary, responsible for carrying out her employer's orders, and subject to termination if she failed to do so.

In late 1987 and early 1988, it became known that Stuart Karl had been involved in making illegal campaign contributions on behalf of Gary Hart's presidential campaign and the senatorial and congressional campaigns of other Democratic candidates. Mr. Karl was allegedly heavily involved in making illegal contributions. At the very outset of the investigation, Rama Middel, Mr. Karl's secretary, came forward and disclosed to the Federal Election Commission, to Lorimar (Mr. Karl's former employer), to the Federal Bureau of Investigation, to the United States Attorney's Office and to the media, the nature and extent of Mr. Karl's political activities. Absent Ms. Middel's voluntary cooperation, the nature and extent of Mr. Karl's violations would have escaped detection. Indeed, much of Mr. Karl's illegal contributions consisted of having others make campaign contributions by check and reimbursing them with cash. Without confirmation and documentation of these contributions by Ms. Middel, there would be absolutely no evidence that any such thing happened.

Attached hereto as an Exhibit are several newspaper articles that establish Ms. Middel's role in disclosing Mr. Karl's campaign activities and violations of law.[4] Mr. Karl was

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[4] The General Counsel's Brief omits a single fact exculpatory or in mitigation of Ms. Middel's conduct.

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investigated by the FBI and the United States Attorney's Office for criminal violations. Ms. Middel was a key witness on behalf of the United States Attorney's Office and the federal government and was instrumental in the investigation. Ms. Middel was instrumental in Lorimar's investigation of the conduct that allegedly occurred while Mr. Karl was operating Karl-Lorimar Home Video.

Almost ten years have passed since the conduct which is being investigated here. In that ten years, the candidate who received the bulk of the allegedly illegal contributions, Gary Hart, has completely and fully withdrawn from political life. The individual responsible for making those contributions, Stuart Karl, is dead. (On August 16, 1991, Stuart Karl died of cancer.) This case has long since faded from the public view and the public memory. Rama Middel, the secretary, with absolutely no authority to make any decisions, and absolutely no interest in the elections involved, is being investigated by the Federal Election Committee. She is now working as a salesman for an insurance company, doing "cold calls" and trying to make a living selling insurance. She lives in Orange County and remains totally apolitical. It is Rama Middel who, having been used by Stuart Karl and then made the case for the government, finds herself marked for prosecution.

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IV.

ANY FINDING ADVERSE TO MS. MIDDEL

IS ABSOLUTELY INAPPROPRIATE

1. The Facts Do Not Justify Such a Finding

The Federal Election Commission has a broad power to investigate and make findings regarding conduct in violation of the Federal Election Laws. That broad power encompassed under Title 2 of the United States Code, permits the Commission wide latitude in determining who to investigate. It is obvious that the intent of the law was to punish those who willingly injected themselves into the political processes and took actions voluntarily and for their own political purposes in violation of the election laws. It is similarly obvious that the laws were not enacted to punish the secretary of an illegal contributor.

Ms. Middel was never anything more than the secretary of Stuart Karl. She was never interested in any election and never willfully injected herself into the election process. Mr. Karl on the other hand, was an ardent supporter of Democratic candidates, including Gary Hart. As such a supporter, Mr. Karl took advantage of his position as the president of Karl Home Video and Karl-Lorimar Home Video, to use the people he had working for him and the finances he had available to him to further the political campaigns of his favorite candidates. Mr. Karl is dead. Mr. Hart's political campaign is dead. Clearly, Mr. Karl violated the law, but he is not here to punish. Ms. Middel is becoming a scape goat. Ms. Middel is being singled out by the Commission for her

2304353283 4

conduct as Mr. Karl's secretary. Her actions, while they might have been in technical violation of the Election Code, were not evil in and of themselves; they were statutory violations of regulatory scheme. There is no evidence that Ms. Middel knew the nature and extent of these regulations. Ms. Middel simply obeyed Mr. Karl's orders. Had she not, she would have been unemployed. To punish Ms. Middel under such circumstances, particularly when Mr. Karl is dead, is completely unjust. Further, Mr. Karl and the extent of his activities was discovered only through the voluntary cooperation of Ms. Middel; it would seem that the goal of the Federal Election Commission, would be to encourage employees (particularly secretaries who are not willfully involved in wrongdoing) to come forward with information against their employer, not punish them once they did so come forward. Without Ms. Middel's cooperation, Mr. Karl's conduct would not be disclosed. This cooperation is now being used against her. To punish her for her cooperation is particularly absurd, and would result in discouraging cooperation.

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V.

CONCLUSION

For the reasons set forth herein, the Commission should find no probable cause to conclude that a violation occurred.

DATED: January 24, 1992

Respectfully submitted,

MICHAELSON & LEVINE

By _____
JANET I. LEVINE
Attorneys for Respondent
Rama Middel

9304353283 36

naign), but are not responsible for about it. I can't speak for the 1984 all such donations to Karl.

ORANGE COUNTY REGISTER SUNDAY JANUARY 24, 1988

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 JAN 27 PM 3:40

Karl might have given candidates $30,000 illegally

By Michael A. Lednovich,
Jean O. Pasco
and Larry Peterson
© 1988, The Orange County Register

A review of campaign-finance reports shows that presidential hopeful Gary Hart and two congressional candidates were given $30,000 in possibly illegal campaign donations by home-video promoter Stuart Karl.

Karl, 34, of Newport Beach, used employees of his now-defunct video company to disguise contributions in excess of the $1,000 federal limit, sources said.

The contributions, listed in reports filed with the Federal Election Commission, were made to ...'s 1984 and 1988 campaigns ... to the unsuccessful 1986 congressional election efforts of Kathleen Kennedy Townsend of Baltimore and Orange County Superior Court Judge Dave Carter.

"Everything we did was illegal as hell and Stuart knew it," said Rama White Middel, Karl's former executive aide at the Karl-Lorimar Home Video Co., which became defunct in 1987. Middel was responsible for soliciting some of the contributions and paying back employees with cash she withdrew from Karl's bank account.

Former Karl employees told the Register that they were pressured into making donations for which they were reimbursed by Karl.

The subterfuge, which two sources say was undertaken following instructions by key Hart campaign advisers, was intended to circumvent federal election laws prohibiting candidates from receiving more than a $1,000 donation from an individual.

Hart received a total of $16,750 for his 1984 and 1988 campaigns from 20 Karl-Lorimar workers or ... relatives, according to campaign records.

...arter received $10,000, and ...wnsend $5,480 for their 1986 con-

KARL: Former employees said they were pressured into making contributions, then repaid

FROM 1

gressional campaigns from Karl-Lorimar employees, the records show.

"Just about all those contributions are bogus. Of the money solicited from employees for elections, 95 percent was paid back to them in cash by Karl," Middel said.

The Register previously reported Middel's statement that she was told by Karl on numerous occasions to go to the bank and withdraw cash from his personal account to repay workers who had given to the campaigns.

"I was told by Karl and others that cash should be used because no one could trace it," she said. "At first it was just a few thousand dollars (repaid to employees). But later, Karl started to hit on the company executives and I was lugging around thousands of dollars of cash from the bank. The whole idea was to make the contributions look legal."

Middel, who said she made a $250 contribution to Townsend during a fund-raising event at Karl's house, said her boss was anxious to please Hart and others. She said Karl reimbursed her for the donation.

"The problem with Stuart is that he is a very generous man who went too far over the line to please his politician friends," she said.

After the Register disclosed several questionable donations earlier this week, Hart took time out from his campaigning in Iowa to announce his campaign had discovered two illegal contributions from Karl and that the money would be returned.

"I felt like I was doing something wrong, but I needed the job. You couldn't go against Stuart. He is such a dynamic personality, it's hard to say no," said the employee, who asked to remain unidentified.

In addition to contributing to Hart, the employee said she gave $100 each to the Carter and Townsend campaigns, again at Karl's request. On all three occasions, she said, she was repaid in cash by Middel.

"It's all true," the employee said of allegations that Karl was funneling illegal contributions to Hart and others. "I'm so happy it's coming out. (Karl) wanted Hart in there at all costs. To jeopardize our jobs like that was wrong."

> **"Everything we did was illegal as hell and Stuart knew it."**
>
> **Rama White Middel**
> Stuart Karl's former executive aide

Hart was campaigning in Iowa on Saturday and could not be reached for comment.

Repeated attempts to reach Karl were unsuccessful.

Laguna Beach attorney Bernie Schneider, general counsel for the Hart campaign, noted in an interview Saturday that most of the contributions for which Karl allegedly reimbursed his employees were made during the 1984 campaign.

Campaign records show that $12,250 was contributed by Karl-Lorimar employees for the 1984 effort.

"With regard to the 1988 campaign contributions," Schneider

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Hart Returns Potentially Illegal Contributions

By MAURA DOLAN and BOB SECTER, *Times Staff Writers*

BOONE, Iowa—Democratic presidential candidate Gary Hart, bogged by reports of improper campaign contributions, said on Friday that he has returned two potentially illegal contributions to his 1988 campaign.

Pledging that "there's not going to be any illegal conduct in this campaign," Hart said he has tried to set a high ethical tone throughout his political career.

"I have tried my very best for 12 or 15 years to run clean campaigns up to now," he said during a campaign swing through Iowa. "I don't know of any charge . . . of unethical or illegal conduct."

Bernie Schneider, an attorney for the Hart campaign traveling with the candidate, acknowledged that the 1988 campaign received two contributions of $750 each in December, 1986, from two employees of video producer Stuart Karl, a Hart backer.

Ex-Employees Quoted

The Orange County Register reported Friday that three former Karl employees had told the newspaper Karl had masked contributions to Hart and to candidates for Congress by pressuring workers to make donations and then reimbursing them.

Hart said the contributions were "in violation of not only the restrictions placed upon campaigns by the Federal Election Commission but also my own standards for campaign practices, and we're going to return that money."

Schneider said the campaign learned of the allegations from published reports and had not independently confirmed the contribution came in fact from Karl.

"All we know is that there is a hint of impropriety," he said. "So we went back and reviewed the records, found the two people and we've written the checks today."

FEC reports list a December, 1986, contribution to Hart of $750 by Steven J. Bornstein of Venice, Calif., who was described on the report as an employee at Karl-Lorimar Video.

Rama Middell, a former executive assistant for Karl, said Friday she also wrote checks for candidates, including Hart, at Karl's request and was reimbursed later.

"I was asked to do it and I felt if I didn't that my job could be in jeopardy so I did it," said Middell, who lives in Irvine. She said she also asked other employees on Karl's behalf to do the same.

"I was the one who was directed by Stuart to collect the checks, go to the bank, get cash and pay them back," Middell said.

From June, 1986, to November, 1986, Karl also paid the salary of Hart aide Dennis Walto, who was performing advance work for the candidate. Hart strongly defended Walto on Friday, calling him a "very, very good friend" and an "honorable, fine young man." He said Walto worked for the campaign as a volunteer and maintained that it is not usual for corporate employees to devote free service to political campaigns.

"This man, to my knowledge, has never violated the law or ever would," Hart said.

Schneider said Walto, who continues to do advance work for Hart, probably will become a paid Hart campaign employee for first time next week. He said the campaign had previously planned to put Walto on staff after getting federal matching funds.

"It's our understanding that he performed services for the [Karl] company," Schneider said. "He also helped Gary out. He's been helping Gary out since 1983, every chance he could get."

Schneider also defended an agreement under which Hart settled a $96,000 debt with Karl by paying him 10 cents on the dollar. He said the campaign has settled other large debts at the same discount.

Although reporters dogged Hart and his aides with queries about the controversy, the crowds that showed up to meet the candidate at roadside diners and restaurants seemed hardly aware of the flap. Only one spectator at one of Hart's many appearances asked about it.

"He hasn't killed anybody," said Connie Ryan, a vacuum cleaner saleswoman who went to the Bee Hive restaurant in Jefferson to see the candidate. "That's about the only thing I'd oppose him for."

At the Bee Hive, Hart wandered through the gold vinyl booths shaking hands while patrons munched on chicken sandwich
Eldora Whiton, who stopped i
the restaurant for coffee just bef
Hart arrived, said she didn't kn
much about the funding controv
sy but what she did know
wasn't too happy abou

"I don't know why [pol
cians] let things like at sl
because they know they are go
to get caught," the gray-hai
farmer said. "Donna Rice was e
er for me to understand," she s
referring to Hart's relations
with the Miami model last year.

Staff writer Claudia Luther
Orange County contributed to
story.

FD-350 (Rev. 5-8-81)

(Indicate page, name of newspaper, city and state.) Page 1 The Miami Herald

(Clipping in Space Below)

Date: 1/20/88
Edition:

Title: Hart's campaigns secretly subsidized

Character: Election Laws
or Federal Known Subject
Classification: 56C-315
Submitting Office: SANTA ANA RA

Indexing:

Hart's campaigns secretly subsidized

One of Gary Hart's key campaign aides was secretly subsidized in the initial phases of the current presidential campaign at the direction of a Southern California video producer who also pumped thousands of dollars into Hart's campaign in 1984 when it was desperate for cash.

The video producer, Stuart Karl, amassed a fortune marketing Jane Fonda workouts and Playboy videos for home VCRs before befriending Hart in 1983.

Since then, he has chauffeured Hart in Lear jets and helicopters; paid a $3,000-a-month salary to Hart aide Dennis Walto while Walto traveled at Hart's side in 1986 and into 1987, and covered such costs as car rentals, printing, signs, plastic bags and even souvenir flying disks used in Hart's last-ditch attempt to win the Democratic nomination at the 1984 party convention, The Herald has found.

Federal law prohibits a candidate from accepting any money from corporations and no more than $1,000 per election from any contributor, a limit that also includes professional services.

The law also bars an employer from assigning an employee to work on a candidate's behalf for more than one hour a week, unless that work is reported as a "contribution in kind" and subjected to the same $1,000 limit.

Hart declined on Tuesday to be interviewed, but campaign manager Susan Casey said the candidate had no knowledge of Karl's spending on behalf of his 1984 bid or in support of Walto in the current campaign.

Karl, 34, declined to answer questions on the advice of his attorney, Michael Genovese, because of his involvement in an unrelated lawsuit.

A failure to disclose any such help, said Federal Election Commission spokeswoman

Please turn to HART / 18A

Stuart Karl: Provided helicopter and jets for Hart.

Gary Hart: Frequently received businessman's help.

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Sharon Snyder, would be regarded as a "backdoor contribution" contrary to the law.

The total of Karl's checks exceeded the $1,000 limit on contributions to political campaigns, according to public records, previously secret financial documents and extensive interviews with people directly involved in providing money to the Hart campaign or who were familiar with Karl's various business interests.

Since they met in the early days of Hart's first presidential campaign, Karl has been an enthusiastic financial backer, giving Hart and his various committees the maximum allowable financial contribution and relying on his circle of California friends to attend lavish fund-raising banquets.

However, in the days prior to the Democratic National Convention in July 1984, Karl also authorized checks to be written on his personal account at the First Interstate Bank in Corona Del Mar, Calif., to pay various San Francisco businesses for material and services needed by the Hart campaign. Copies of those checks, totaling $15,802, have been obtained by The Herald.

At the time, Hart was working frantically to wrest the nomination from Walter Mondale by converting Mondale's delegates to his side before the nominating vote.

"We went with no money," recalled Keith Glazer, a senior campaign staffer in 1984. "But we wanted to fight for the nomination. We thought Mondale was soft and it was worth it to go after his delegates."

THE HOUR OF NEED

In that hour of need, Karl's checks helped pay for the final battle. Karl's then-executive assistant, Rama White Middel, who actually wrote the checks, said Karl instructed her that when Hart officials called asking for money to "give them what they want.

"Stuart told me, 'Listen, we're going to be paying some bills for Hart . . . So-and-so is going to call you from the Hart campaign. Give them what they want. Do whatever they say. They are going to give you a list of names, a list of amounts and addresses and you're going to go ahead and pay them."

Most of the checks bear the handwritten notation "Hart for president" or "Americans with Hart," or "Hart campaign."

In addition to the checks, Middel said she also arranged thousands of dollars in wire transfers from Karl's bank to accounts specified by Hart campaign staffers, again, acting at their specific request.

"There were at least two or three times when a large amount needed to be wired into a bank account and it had to do with paying Hart debts," she said. "It was wired from Karl Home Video's corporate account into whatever account they asked us to wire it into."

Karl's expenditures on behalf of Hart could not be explained by Michael R. Moore, until recently the campaign's chief financial officer who prepared his FEC reports, or the campaign's convention chairman, Michael Cheroutes, a Denver lawyer.

Moore said "on the surface" the checks written on the Karl account for convention materials "look like a violation" of campaign spending laws.

Moore said if such checks were written by a supporter, "He has an obligation to tell, and we have an obligation to report it as a contribution in kind. And no contribution can exceed $1,000."

'TV PRODUCTION'

Cheroutes said: "There is a note in my files that indicates to me that somebody in the campaign had an arrangement with Karl to provide floor demonstration material."

But Karl's lawyer, Genovese, mentioned no such arrangement. FEC spokeswoman Snyder also said that such an agreement between a campaign supporter and a candidate would generally require advance approval because of the potential for abuse.

She said the FEC has allowed such payments only in cases where the provider is in the business of offering similar services and would do the same for any candidate.

FEC reports do show that Hart's 1984 campaign owes Karl's company $96,000 — a debt Karl is offering to settle for 10 cents on the dollar.

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The FEC notation shows it is for costs incurred for "TV production." But no television video was ever produced, according to senior executives of the video company and Hart's 1988 campaign communications director, Beth Smith.

Genovese, Karl's lawyer, insisted that the debt was legitimate.

"I think they wanted to do a life story on Gary Hart," he said. "There was substantial production money spent."

But Genovese said he could not relate the checks written for convention materials to any TV work. One check, for example, covered the cost of 800 foam-rubber flying disks from a novelty company called Wing Aero of Richland, Calif.

Each disk was embossed with the words "Hart, Democratic Convention, 1984" and the disclaimer "Paid for by Americans with Hart, Inc."

$1.1 MILLION DEBT

These disclosures raise new questions about Hart's campaign finances, which have been a source of problems for the Colorado politician throughout his efforts to win the presidency. He still faces a $1.1 million debt from his unsuccessful 1984 campaign.

They also come at a time when he is attempting to resurrect a presidential campaign that collapsed last May over questions of credibility and judgment after The Herald reported Hart's relationship with Miami model Donna Rice.

Hart, however, has consistently said he applied high standards to his handling of contributions. During a debate last week in Des Moines, Iowa, he referred to what he called his own "public morality" and noted that he does not accept money from political action committees.

"There is a difference between public morality and private morality," Hart said. "I've held myself to very high standards in terms of both."

He added: "I would never condone anyone in my administration who breached the highest standard of the sacred trust of the public duty."

Moore, his campaign treasurer from 1984 until last month, said Hart insisted on a campaign that was careful to stick to the rules of campaign financing.

"Generally, our attitude was not to run close to the line," Moore said. "There were a lot of things we could have done that may have been legal, but we didn't want to do them because they conveyed the appearance of being willing to cut corners."

Yet Hart frequently enjoyed Karl's generosity.

In 1985 and 1986, Karl — at the request of Hart aides, according to a source — picked up the cost of flying Hart and several of his staff members across the country in Lear jets.

On one occasion, Karl sent one of the private jets from the John Wayne Airport in Irvine, a southern suburb of Los Angeles, to Washington, D.C., for the sole purpose of picking up Hart and his wife Lee and returning them to their home outside of Denver.

The jet then returned empty to its starting point — a trip that cost between $14,000 and $16,000, according to a chartering agent familiar with the arrangement.

On two other occasions in those years, Karl provided a helicopter to carry Hart from Los Angeles International Airport back and forth to political events in Southern California — trips that saved 45 minutes in freeway driving, but cost about $5,000. Hart has disclosed two trips paid by Karl in 1985 on his Senate gift disclosure forms.

KARL HIRES WALTO

In mid-1986, barely days after Hart informally began his quest for the 1988 nomination, Karl hired Dennis Walto — a veteran of Hart's 1984 campaign and now a part of Hart's senior staff — and put him on the payroll of the company he headed, Karl-Lorimar Home Video of Irvine.

Karl-Lorimar, the successor to Karl Home Video, became a division of Lorimar Telepictures in November 1984, when it was swallowed by the Hollywood giant, whose credits include television's *Dallas* and *Knots Landing*.

Karl's decision to put Walto on the corporate payroll came after his return from Denver, where he was among a select group invited to a planning retreat hosted by Hart.

Karl's executive assistant, Middel, said he told her that the Hart campaign wanted Karl to travel with Hart, acting as a spokesman and media liaison.

Because of personal and business commitments, however, she said he was unable to take on the task. His solution was to bring in Walto, whom he had met through Hart and who worked in 1983 and 1984 as a full-time Hart campaign advance man.

Middel said Karl told her, "He's [Walto] going to be doing what I can't do. We're going to put him on the payroll and maybe he can fit in some Karl-Lorimar stuff when he's out there,'" she said.

"But it was clear that the majority of work he was going to do was for the Hart campaign."

Walto's payroll checks were issued by the parent company, according to Lorimar officials in California. A company spokeswoman said he was listed on their records as an "assistant production manager" who was employed from June 3 through Nov. 11, 1986. In addition to his salary, Walto said he also was provided with a Chevrolet Cavalier, which he said was leased by Karl.

Middel said that for payroll purposes, Walto was assigned to the sales and marketing staff at Karl-Lorimar, although his job as explained to her was strictly to help Hart.

Walto spoke with Herald reporters last week during a 50-minute, tape-recorded interview. When asked at the beginning of the interview what he did in 1986 and early 1987, he responded that he worked "full time" for Hart. Walto didn't mention employment with Karl-Lorimar until it was raised later by Herald reporters.

At that point he confirmed being on the Karl-Lorimar payroll from about August through November 1986. After November, he said he did "other projects" for Karl until March 1987, when he formally joined the Hart campaign staff in Denver.

Walto said he had no title at Karl-Lorimar, but was assigned by Karl to travel to video stores around the country and fill out "store profiles" detailing how the company's videos were being displayed.

Walto acknowledged, however, that Karl assigned him no quota of stores to visit. And he said the trips were arranged exclusively to coincide with Hart's schedule of speaking appearances.

TRAVEL ARRANGEMENTS

Walto said he typically would talk with the Hart staff in Denver or Washington to get the senator's schedule, then he would coordinate his travels with the senator's with the intention of acting as an advance man.

He said all his travel arrangements were made through Karl's travel agent and his expense accounts were submitted directly to Karl. But he insisted that he would take time to visit video stores, as agreed.

"I would do what I had to do, then I would do what I wanted to do," Walto said in describing how he would divide his duties.

He said Karl was both aware of, and supportive of, his work on Hart's behalf at each of these stops.

"As long as I was doing my work, sure, he [Karl] was fine," Walto said. " . . . I would go into a court on a stack of Bibles, if you want, and say I duly performed my job for Karl-Lorimar.

"It was a great job," Walto said. "I felt very lucky to have it at the time. Now I don't feel so lucky to have had it. I think the context is being lost a little bit. Obviously I also made a huge mistake by not knowing the law."

But co-workers at Karl-Lorimar said if Walto was doing any work for the company, they weren't aware of it. Nor did those who were responsible for video sales see any results from the Walto trips.

"I am certain that Dennis Walto was working on Gary Hart's campaign," said Gary Hunt, who was Karl-Lorimar's executive vice president for sales and marketing at the time and whose duties encompassed video store setups.

He said the company had a regional staff that did store profiles and that reported to him.

"We had full-time regional people out there," Hunt said. "If I wanted to know about a store I would call them."

"He [Walto] was introduced to me as a Gary Hart person. If Dennis had been doing anything related to sales, I would have known about it," Hunt said.

Walto said he was "terminated" by Karl from the video company's payroll at the end of November 1986, largely because he was spending so much of his time on the Hart campaign.

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"I was spending a lot of time making Hart-type calls and, you know, helping out Gary more than I was helping out the company," he said.

But Middel said Walto was merely moved from the Lorimar payroll onto that of a separate video production company controlled by Karl.

For the next two months, until he joined the 1988 Hart committee as an employee in late February 1987, Walto said he continued to travel with Hart at Karl's direction. The purpose of those travels, he said, was Karl's interest in making a new video about Hart's run for the White House — a video that Karl hoped to market at a profit.

'LOCATION WORK'

"I was doing the location work then," Walto said. "We were sending out some crews, we were doing a lot of that."

Much of the result "is in the can," Walto said, but the project fell by the wayside when Hart withdrew from the race last May and when Karl was forced out of the company by his corporate bosses at Lorimar Telepictures. He resigned after conflict of interest allegations surfaced and is presently facing a multimillion dollar lawsuit by the parent company Lorimar.

Walto said he did not collect a salary during the nearly three-month period in which he worked on the Karl video project. But Middel said she recalled moving Walto from the Karl-Lorimar payroll to the second company at the same salary he had been earning.

Beth Smith, Hart's former communication's director, said she was detailed to work with Karl-Lorimar on a video about Hart's positions. She also said the video was never produced.

Some time in March 1987, Walto returned to his previous work as an advance man for the Hart campaign, setting up events and coordinating media coverage. He called this phase "Campaign 87-A," to distinguish it from the revived campaign.

VETERAN RETURNS

When Hart re-entered the race on Dec. 17, Walto was among the few veterans to return and he quickly assumed an even more visible role. In recent weeks, Walto has been frequently quoted as the campaign's spokesman.

He was interviewed by The Herald last week in Ottawa, Kan., Hart's hometown, where he handled arrangements for the candidate's highly publicized appearance there last Saturday.

When the Hart campaign took off after the early primaries in 1984, Karl found himself in a key position as a member of Hart's southern California finance committee.

He was widely quoted in the media in the months leading up to that state's June 5, 1984, primary. And through his contacts in the free-spending entertainment world, he became a major benefactor to the campaign.

As the campaign came to a climax, Middel said Karl instructed her to pay any expenses passed on to her by the Hart campaign's staff, which had gathered in San Francisco awaiting the convention floor fight.

She told The Herald that Karl personally provided "several" — possibly as many as six — rental cars given to Hart aides to be used in the six-week period between the California primary and the convention in July.

She said she ordered the cars at the direction of Hart campaign aide Keith Glazer, a veteran Hart staffer who organized Southern California during the primary and came to know Karl on a first-name basis.

Glazer, who now lives in Oklahoma City, concedes that Hart loyalists spent freely in the attempt to stop the Mondale nomination despite the fact that the campaign had virtually "no money" in its campaign account. Glazer says also that he spoke with Middel "once or twice, but no more than that."

But Glazer says he does "not recall" asking Karl or "anyone in his office" to write checks to cover any of the expenses that were being incurred. He said the campaign sold ads in a Hart magazine as a "self-supporting deal" and possibly "took out a loan" to cover other costs.

No such loan was reported to the FEC by Hart's campaign, then called Americans with Hart.

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THIRD-PARTY PAYMENTS

Karl's lawyer, Michael Genovese, said the $96,000 that Karl is owed by Hart's 1984 campaign encompasses the checks written to the various vendors despite the notation that it was for television production.

"There was an obligation with the Hart campaign . . ." said Genovese. "I believe those checks have been reported and approved by the FEC."

Casey, Hart's campaign manager, expressed a similar theory Tuesday: "It was a fairly customary thing for local people to pick up the tab, then bill the campaign.

"Stuart sent us a big bill at the time and we assume that it [convention materials] is what it was for."

Federal election law would allow a third party to pay for various campaign expenses, but only if it did so while acting as the campaign's subcontractor and if such work was a normal course of its business.

The FEC can bring civil suit against violators. It can also levy fines and order repayment of any illicit campaign contributions.

Moore, the Hart treasurer, said he could not see how Karl's video company could contract with the Hart campaign to do the type of work entailed at the Democratic convention.

He said he frequently sent out letters warning staffers to comply strictly with the election law, and to report any transactions that might appear shaky. Hart personally disclosed contributions that he may not have had to, Moore said, "which was one of the things that attracted me to his campaign."

But, he added, "one of the most difficult things you can do in a campaign, especially one that exploded as fast as Gary's did in 1984, was keep control of all the money."

Herald Staff Writer Fred Grimm contributed to this report.

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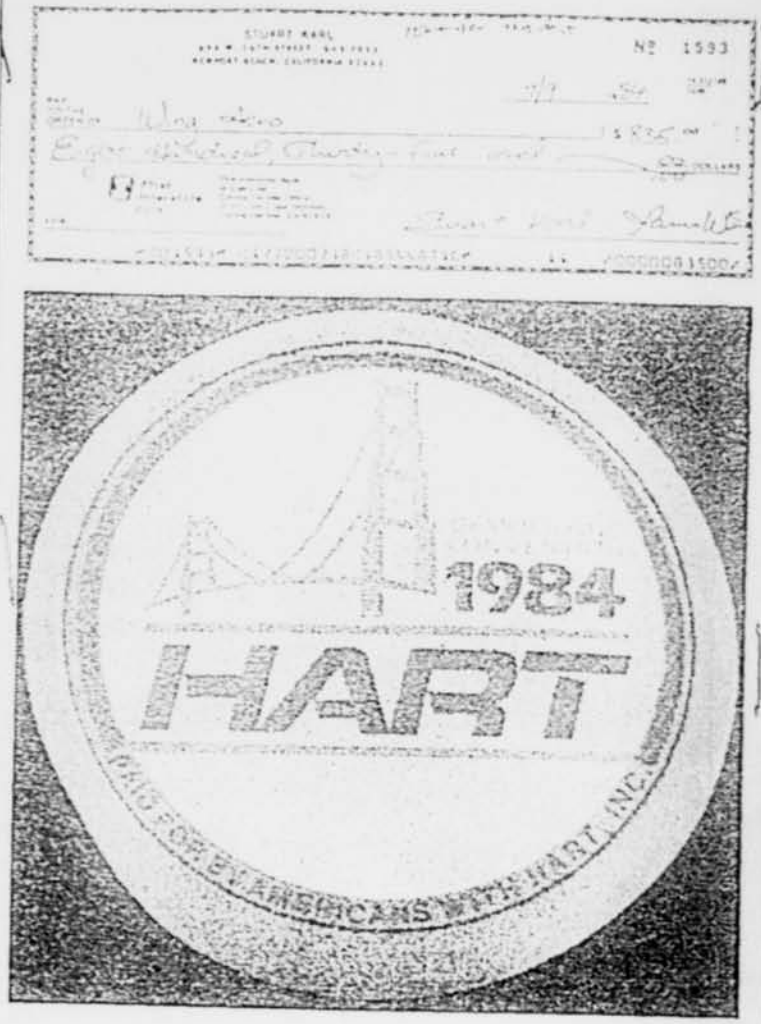
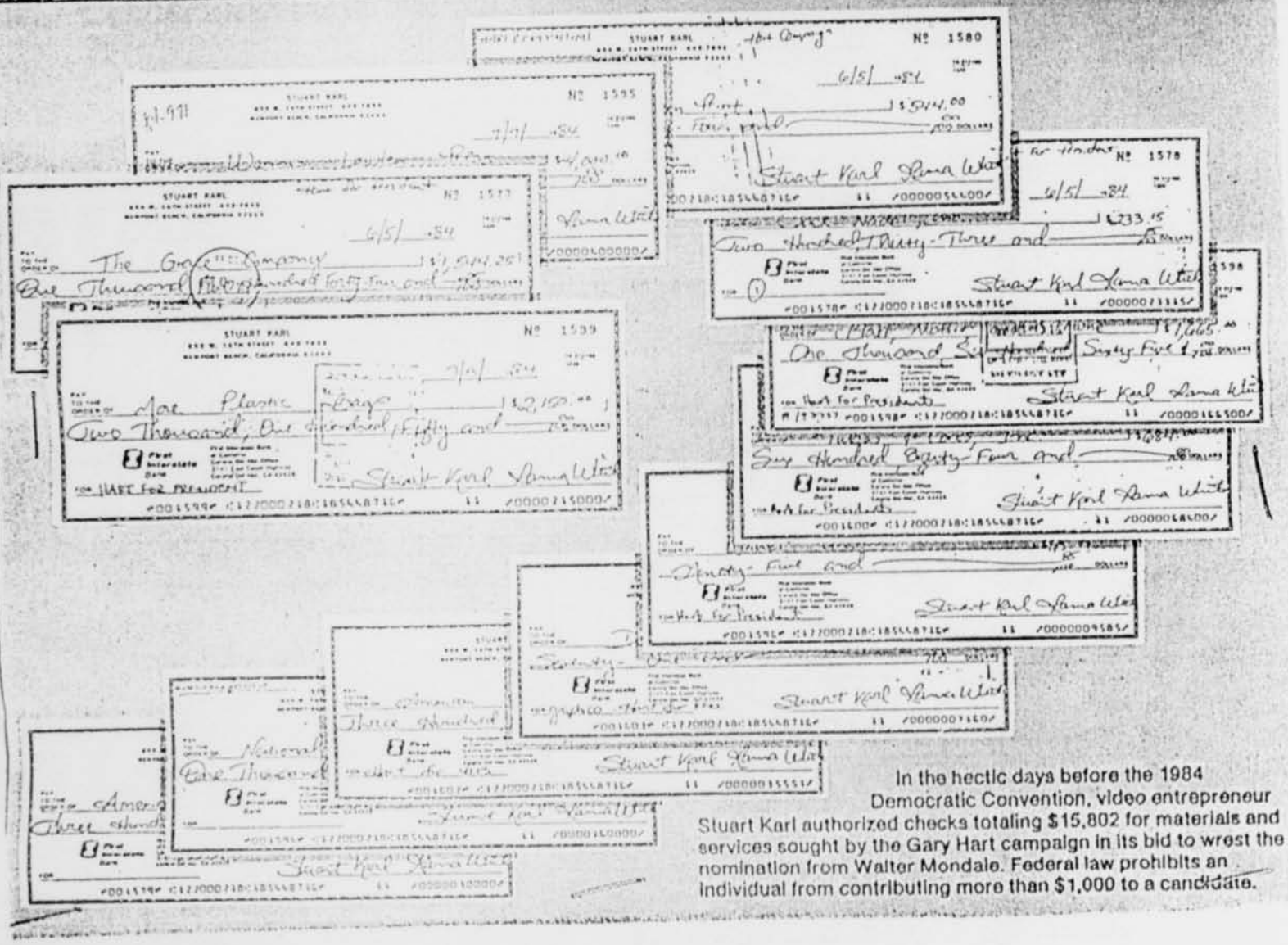


This $835 check paid for 800 soft flying disks that were distributed by Hart backers to convention delegates. Each disk is stamped with the notation that it was paid for by Americans with Hart, Inc., the campaign's official committee.

HART CAMPAIGN EXPENSE CHECKS



In the hectic days before the 1984 Democratic Convention, video entrepreneur Stuart Karl authorized checks totaling $15,802 for materials and services sought by the Gary Hart campaign in its bid to wrest the nomination from Walter Mondale. Federal law prohibits an individual from contributing more than $1,000 to a candidate.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 28, 1992

Abraham Kantzabedian
219 Grant Street
Newport Beach, CA 92663

RE: MUR 2583

Dear Mr. Kantzabedian:

On December 23, 1991 you were notified that the Office of the General Counsel is prepared to recommend that the Federal Election Commission find probable cause to believe that you violated 2 U.S.C. § 441f. On that same date, you were sent a brief stating the position of the General Counsel on the legal and factual issues of the case.

You were informed that you had 15 days from your date of receipt to file a responsive brief. To date, you have not responded. Unless we receive a response from you within ten days, this Office will proceed to the Commission with recommendations.

Should you have any questions, please contact me at (202) 219-3690.

Sincerely

Jose M. Rodriguez
Attorney

9304353228847

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 28, 1992

Dennis Blackburn
19141 Woodfarm Terrace
Irvine, CA 92714

RE: MUR 2583

Dear Mr. Blackburn:

On December 23, 1991 you were notified that the Office of the General Counsel is prepared to recommend that the Federal Election Commission find probable cause to believe that you violated 2 U.S.C § 441f. On that same date, you were sent a brief stating the position of the General Counsel on the legal and factual issues of the case.

You were informed that you had 15 days from your date of receipt to file a responsive brief. To date, you have not responded. Unless we receive a response from you within ten days, this Office will proceed to the Commission with recommendations.

Should you have any questions, please contact me at (202) 219-3690.

Sincerely

Jose M. Rodriguez
Attorney

2304353284848

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

92 JAN 31 AM 11:38

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 5, 1991

92 JAN 31 PM 3:47
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

POSTMASTER

Newport Beach, CA

92663

MUR 2583

ADDRESS INFORMATION REQUEST

Pursuant to 39 C.F.R. § 265.6(d)(1), please furnish this agency with a new address, if available, for the individual or entity listed below, or verify whether the address given below is one at which mail for this individual or entity is currently being delivered.

NAME: George Reginald Unwin

LAST KNOWN ADDRESS: 177F Riverside

Newport Beach, CA 92663

Under 39 C.F.R. § 265.8(g)(5)(i), we request a waiver of fees. In this connection I hereby certify that the Federal Election Commission, an agency of the U.S. Government, requires the information requested above in the performance of its official duties, and that all other known sources for obtaining it have been exhausted. A return envelope is enclosed for your convenience.

Lois G. Lerner
Associate General Counsel

FOR POST OFFICE USE ONLY

( ) Mail is Delivered to Above Address
( ) Moved, left no forwarding address
( ) No such address
( ) Other (Please Specify)

New Address : NO PHYSICAL ON FILE
PRIVATE MAIL BOX

USPO NEWPORT BEACH, CA RIVERSIDE
JAN 28 1992

9304353284 9

Jan. 23,1992

Federal Election Commission
999 "E" Street, NW
Washington, D.C. 20463

RE: MUR 2583
Alison Weir

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 FEB -3 PM 3:47

9304353285O

I'm writing this letter in responce to the brief I received January 2, 1992. I would first like to state that your assertion that my submissions have been "less than candid" is not a truthful representation of the facts. Never have I ever denied making a contribution to the AWH. Mr. Rodrigues stated that he would send me a copy of the "check", and since I have not received a copy all I can say still, to best of my recollection I have no memory of making any such contribution, or receiving any supposed rembersement.

This check was supposedly written almost eight years ago. I have honestly responded to all inquiries to the best of my ability. Why this is being prosecuted at this late date after Stuart Karl's death and I'am no longer able to confront him is beyond my comprehension.

In my opinion Stuart's ethics were less than upstanding. Yes my mother was a personal friend of his and he manipulated her out of every cent of her savings. Her income at this time consists entirely of social security and what help I can give her. I myself work as a seamstress earning ten dollars per hour before taxes. Both my mother and myself have been staying with

friends for the l[redacted]nine months as we can no[redacted]nger afford a home or apartment. My Newport Beach address is a mailbox. I drive a 1963 Rambler station wagon and any supposition you may have that either my mother or myself have benefited from any association with Stuart Karl is patently incorrect. I feel that we ourselves have been victimized my a person who abused his power and position.

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RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

92 FEB -6 AM 9:15

Jeffrey M. Ettinger, Esq.
P. O. Box 800
Austin, MN 55912

92 FEB -6 PM 3:14

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

January 31, 1992

Writer's Direct Dial Number: (507) 437-5760

Jose M. Rodriguez, Esq.
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington D.C. 20463

Re: Court Shannon
MUR 2583

Dear Mr. Rodriguez:

Pursuant to our conversation the other day, I am writing to formally notify you that I received the latest materials from your office on January 20, 1992 and that a response is thus expected from Mr. Shannon on or before February 20, 1992.

I am also writing to formally inquire about the Commission's rationale as to why any action based upon the incidents set forth in the draft conciliation agreement would not be barred by the applicable statutes of limitation. As you will recall, I raised this issue with you in our phone conversation, and you instructed me to raise it formally in writing in order to obtain a response.

In addition to the statute of limitations issue, I also believe that any action in this matter may be barred by the equitable doctrine of laches. The actions at the root of this matter all occurred several years ago, in 1984 and in 1986. The Commission has been aware of this matter since the beginning of 1988, and I personally attempted to seek pre-probable cause conciliation on behalf of Mr. Shannon back in July of 1988, over three and one-half years ago. Moreover, as you are unquestionably aware, the instigator of this entire chain of events, Mr. Stuart Karl, died last year.

In light of these factors, I question why it is necessary for the Commission to reopen this long-dormant manner. I can represent that Mr. Shannon has adhered to all requirements of the federal election code in the several years that have gone by since his unfortunate involvement with Mr. Karl. He also cooperated fully with all investigators back in 1988 when this matter surfaced.

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Please let me know at your earliest convenience about the Commission's response to the inquiry about the statute of limitations and about laches.

Very truly yours,

JEFFREY M. ETTINGER
Corporate Attorney

mjh

9304353285 3

ABRAHAM KANTZABEDIAN
219 GRANT ST.
NEWPORT BEACH,CA 92663

FEBRUARY 9, 1992

FEDERAL ELECTION COMMISSION
ATTENTION: JOSE M. RODRIGUEZ
WASHINGTON,D.C.20463

RE: MUR 2583

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 FEB -8 AM 10:40

Dear Mr. Rodriguez:

Prior to our conversation on Monday February 3,1992 you said you would sand me a copy of the letter that you had mentioned.

To my recollection Stuart Karl approached and asked me to write him a check for the sum of 1,000.00 dollars and leave the name blank,He stressed me howe important it was for me to give him the check,I explained to Stuart that I did not have one thousand dollars He's answer to me was I will give you the money,so in fear of my job I gave him the check.

Dear Federal Election Commission I dont know how clos I can make you understand that I was not aware of any illegal transactions were taking place.

Sincerely,

ABRAHAM KANTZABEDIAN

2304353285 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 14, 1992

Jeffrey M. Ettinger, Esq.
P.O. Box 800
Austin, MN 55912

RE: MUR 2583
Court Shannon

Dear Mr. Ettinger:

This is in response to your letter dated January 31, 1992, inquiring about the applicability of the relevant statute of limitations and the equitable doctrine of laches in barring the matter at issue. The applicable statute of limitations is found at 2 U.S.C. § 455. The courts have construed the three-year statute of limitations found at § 455 to apply only to the commencement of criminal proceedings and not civil investigations conducted by the Commission pursuant to 2 U.S.C. § 437g. FEC v. Lance, 617 F.2d 365 (5th Cir. 1980), aff'd, 635 F.2d 1132 (en bank), cert. denied, 453 U.S. 917 (1981); FEC V. Sailors' Union of the Pacific Political Fund, No. 84-7763 (N.D. Calif. October 30, 1985) (granting partial summary judgment); FEC v. Wolfson, No. 85-1617 (M.D. Fla. February 6, 1986) (granting summary judgment in favor of Commission in face of statute of limitations argument).

Likewise, the equitable doctrine of laches is inapplicable to administrative proceedings absent clear Congressional intent to make it applicable. FMC v. Caragher, 364 F.2d 709 (1966) (citing United States v. 93 Court Corp., 350 F.2d 386 (2nd Cir. 1965), cert. denied, 382 U.S. 984 (1966)). There is no such Congressional intent concerning the Federal Election Campaign Act of 1971, as amended. Even assuming its applicability, you provide no evidence that your client has been adversely prejudiced as a result of the duration of the investigation. Absent such evidence, there is no equitable basis for application of the doctrine.

2304353285

Regarding the two contributions you mention, our records indicate that The Kerry Committee did not refund your client's $2,000 contribution, and that $1,000 of his $2,000 contribution to the Committee for Tim Wirth, Inc., was refunded. Partial refund of the latter contribution, however, does not obviate the fact that your client made the contribution in the name of another.

Sincerely,

Jose M. Rodriguez
Attorney

23043532856

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92 MAR -3 PM 1:13

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 19, 1992

POSTMASTER
Irvine, CA 92714

MUR 2583

92 MAR -3 PM 3:30
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

ADDRESS INFORMATION REQUEST

Pursuant to 39 C.F.R. § 265.6(d)(1), please furnish this agency with a new address, if available, for the individual or entity listed below, or verify whether the address given below is one at which mail for this individual or entity is currently being delivered.

NAME: Dennis Blackburn

LAST KNOWN ADDRESS: 19141 ~~Woodfarm~~ Woodford Terrace
Irvine, CA ~~92714~~

Under 39 C.F.R. § 265.8(g)(5)(i), we request a waiver of fees. In this connection I hereby certify that the Federal Election Commission, an agency of the U.S. Government, requires the information requested above in the performance of its official duties, and that all other known sources for obtaining it have been exhausted. A return envelope is enclosed for your convenience.

Lois G. Lerner
Associate General Counsel

FOR POST OFFICE USE ONLY

(X) Mail is Delivered to Above Address
( ) Moved, left no forwarding address
( ) No such address
( ) Other (Please Specify)

IRVINE CA MAIN OFFICE FEB 25 1992 USPS

RT 1505

New Address : 19141 Woodford Terrace
Irvine, Ca 92715

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COMMISSION
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MAR 16 12 59 PM '92

MUR 0593

March 9, 1992

92 MAR 16 PM 3:38

Mr. Jose M. Rodriguez
Federal Election Commission

Dear Mr. Rodriguez,

Here are my (13) copies of my responsive brief. Please forward them to the proper parties.

Dennis M. Blackburn

2304353285858

March 9, 1992

Federal Election Commission
Washington, D.C. 20463

RE: MUR 2583

Dear Sirs:

I would like to appear before you to state my story, but, unfortunately, the rules of your game do not permit this.

As long as I'm on the Rules of your game I would like to express my dissatisfaction. This alleged violation occurred over eight years ago. I believe it was over six years ago that I freely spoke with the F.B.I. & Federal Grand Jury. Then on June 20, 1988 I received communication from the Federal Election Commission, nearly four years ago. At that time I responded in writing, (please see an enclosed copy) and I answered all questions.

I would like you to note the last sentence of the first paragraph, "It is my hope that after answering your questions that this matter can be resolved quickly," and the last sentence of the last paragraph, "As I stated earlier, I am hopeful that this matter can be resolved quickly." Now almost four years later, I am writing again. I think this is wrong. After writing the letter I then waited, heard nothing, thought it may have been resolved, and then, on July 8, 1991 received a letter stating " The General Counsel is preparing to move to the next stage of the Enforcement Process." Three years after responding, I get this letter. This is wrong.

I'm sorry, but, I don't understand how this process works. Speaking of the process, I am accused of violating Section 441f of Title 2. I did not know of this law at the time of the contribution and eight years later, I still do not think I violated the Law. Please see answer 4(G) of my July 11, 1988 letter) What is the source of funds of any contribution? Is it a persons employer that he earns a living from? Is it a persons investments, that he earns income from? Is it a persons income from Inheritance? If a person is asked to make a contribution, writes the check and pays taxes on the earned income, has he violated your law?

2304353285 9

I earned a living from Karl Home Video, was an employee of the company and used the income to pay my bills. I had a base salary from Karl Home Video and I could also write checks to myself, throughout the year, with Stuart Karl's knowledge, for additional income that would be declared a bonus at year end. This is what I did for the political contribution I made. I needed additional funds from Karl Home Video to cover this personal expense. I wrote myself a check, with Stuart karl's knowledge, and charged it to the account that I took my bonus from.

This whole process has gone on much to long, please finish it one way or the other.

Sincerely,

Dennis M. Blackburn

2304353288860

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88 JUL 21 AM 9:35

July 11, 1988

Ms Celia Jacoby
Federal Election Commission
Washington, CD 20463

RE: MUR 2583
Dennis Blackburn

Dear Ms Jacoby:

Thank you for your time on the telephone the other day. I am responding to Thomas J. Josefiak's letter and questions of June 20, 1988. Before I begin, I want you to know it is my intention to fully cooperate with the Federal Election Commission in this matter. I have cooperated fully with the FBI investigation and was granted immunity from prosection. I also testified before the Federal Grand Jury. It is my hope that after answering your questions that this matter can be resolved quickly.

The following are my answers:

1. Dennis M. Blackburn
19141 Woodford Terrace
Irvine, CA 92715

Unemployed...I recently sold my small manufacturing business and am negotiating the purchase of a new business.

2. Yes,
a. Karl Video Corporation and Karl Lorimar Home Video, Inc.
b. Chief Operating Officer, 11/82-11/84.
c. As Chief Operating Officer I was responsible for the day to day operations of the business.

3. Yes, I made a contribution to friends of Gary Hart.

4. a. $1,000.00
b. Yes: Stuart Karl, approximately January 1984.
c. Check- (copy enclosed)
d. I gave the check to Stuart Karl.
e. N/A
f. Yes, Stuart Karl. To the best of my knowledge, Stuart Karl indicated I would be reimbursed. I was asked on three occasions to make this contribution and after the third request I made the contribution.
g. I wrote a company check, from Karl Video Corporation, to reimburse myself. This was common practice that was done when I needed additional money for any type of expenditure. These monies would be loaned to me and then declared as income at the end of the year. This was always done with Stuart Karl's knowledge.

5. N/A

RECEIVED
FEDERAL ELECTION COMMISSION
88 JUL 21 PM 12:14

2304353286 1

6. This is a difficult question to answer. I do not have the available records to answer the question. The FBI has all of the documents which would assist me. Trying to be helpful though, the knowledge I have is that Karl Video Corporation and Karl Productions loaned monies to the Hart Campaign by paying vendors for Hart expenditures. To the best of my knowledge this was always done with the intention of being repaid by the Hart Campaign. If you have copies of these transactions I would be more than happy to share any knowledge I have.

7. I have no knowledge of this.

8. No, I did not work on, plan, prepare, arrange, attend, or participate in any fundraisers.

9. I spoke with Gary Morley of the FBI.

If you have any additional questions, please contact me. As I stated earlier, I am hopeful that this matter can be resolved quickly.

Sincerely,

Dennis M. Blackburn

9304335328662

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

March 23, 1992

Craig C. Donsanto, Director
Election Crimes Branch
Public Integrity Section
Criminal Division
U.S. Department of Justice
Washington, D.C. 20530

RE: Stuart Karl investigation

Dear Mr. Donsanto:

In the last correspondence from the Department in this matter, by letter dated November 1, 1990, Gerald McDowell notified the Commission that "[t]he Karl investigation is still in an open status and we will advise you when this situation changes." This letter also explained that while David Stein was never a "target" of the investigation, he nonetheless remained a "subject" in this matter and that "this status may end in the near future and as soon as that happens we will let you know."

Based on Lawrence Noble's discussions with FBI personnel at the recent Fort Lauderdale FBI/Assistant U.S. Attorney conference, I now understand that the Department of Justice's review of Mr. Stuart Karl's federal election activities and the attendant investigation has been concluded. Therefore, I ask that the Department at last provide the Commission with all evidence developed during the investigation subject to restricting law, as well as the cooperation of relevant FBI special agents to shed light on the evidence provided. Furthermore, so that we can obtain Mr. Stein's testimony, I ask that the Department notify the Commission that the criminal investigation in any way relating to David Stein as to this matter has been closed.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304353286 3

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Court Shannon) MUR 2583
)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On November 5, 1991, the Federal Election Commission ("Commission") decided to enter in pre-probable cause conciliation with Court Shannon,[1] one of the remaining conduit respondents in this matter.[2] See generally General Counsel's Report in MUR 2583, dated October 23, 1991. Attached is a conciliation agreement which has been signed by Mr. Shannon.

2304353286 4

1. Respondent initially submitted a request to enter into pre-probable cause conciliation on July 16, 1988. Because of the need to complete the investigation, the Commission declined to enter into pre-probable cause conciliation at that time.

2. A General Counsel's Report addressing the remaining conduits and the further resolution of the matter will be circulated to the Commission shortly.

2304355328655

For the reasons stated above, this Office recommends that the Commission accept the attached conciliation agreement with Court Shannon

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Court Shannon.

2. Close the file as to this respondent.

3. Approve the appropriate letter.

Date 5/6/92

Lawrence M. Noble
General Counsel

23043532866

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Court Shannon.) MUR 2583

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 12, 1992, the Commission decided by a vote of 4-0 to take the following actions in MUR 2583:

1. Accept the conciliation agreement with Court Shannon, as recommended in the General Counsel's Report dated May 6, 1992.

2. Close the file as to this respondent.

3. Approve the appropriate letter, as recommended in the General Counsel's Report dated May 6, 1992.

Commissioners Elliott, McGarry, Potter and Thomas voted affirmatively for the decision; Commissioners Aikens and McDonald did not cast votes.

Attest:

5-12-92
Date

for Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Thurs., May 7, 1992 2:34 p.m.
Circulated to the Commission: Thurs., May 7, 1992 4:00 p.m.
Deadline for vote: Tues., May 12, 1992 4:00 p.m.

2304355328667

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 20, 1992

Jeffrey M. Ettinger, Esq.
P.O. Box 800
Austin, MN 55912

RE: MUR 2583
Court Shannon

Dear Mr. Ettinger:

On May 12, 1992, the Federal Election Commission accepted the signed conciliation agreement and civil penalty installment payment submitted on your client's behalf in settlement of a violation of 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to your client.

This matter will become a part of the public record within 30 days after it has been closed with respect to all other respondents involved. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel. Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

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. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

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Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jose M. Rodriguez
Attorney

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Court Shannon	)	MUR 2583
	)	

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CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Court Shannon ("Respondent") violated 2 U.S.C. § 441f.

92 APR 22 AM 10:48

NOW, THEREFORE, the Commission and the Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent 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. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

92 APR 20 PM 4:13

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

1. Respondent is a former executive vice president of Karl-Lorimar Home Video, Inc., a company organized under the laws of California. Stuart Karl was the president of Karl-Lorimar Home Video, Inc.

2. Respondent was asked by Mr. Karl or at his direction to make contributions by writing checks for $500 to Americans With Hart, Inc., $1,000 to the Carol Ann Bradford for Congress, $2,000 to The Kerry Committee, $1,000 to Dave Carter for Congress, $2,000 to Committee for Tim Wirth, Inc., $750 to Friends of Gary Hart-1988, Inc., and $500 to Cranston for President.

3. Respondent made the solicited contributions and thereafter accepted reimbursement in cash for those contributions from the corporation.

4. Respondent has cooperated with the investigation in this matter, responding to all requests promptly and comprehensively.

V. 1. a. 2 U.S.C § 441f prohibits any person from making a contribution in the name of another person or knowingly permitting their name to be used to effect such a contribution.

b. Respondent knowingly allowed his name to be used to effect contributions by his employer in violation of 2 U.S.C. § 441f.

2. Respondent contends that his violation of 2 U.S.C. § 441f was not knowing and willful.

9304353287 1

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of One Thousand Dollars ($1,000), pursuant to 2 U.S.C. § 437g(a)(5)(A), such penalty to be paid as follows:

1. One initial payment of $500 due on April 15, 1992;

2. A second and final payment of $500 due on or before June 15, 1992;

3. Each such installment shall be paid on the fifteenth day of the month in which it becomes due;

4. In the event that any installment payment is not received by the Commission by the twentieth day of the month in which it becomes due, the Commission may, at its discretion, accelerate the remaining payments and cause the entire amount to become due upon ten days written notice to the respondent. Failure by the Commission to accelerate the payments with regard to any overdue installment shall not be construed as a waiver of its right to do so with regard to future overdue installments.

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.

9304353287 2

IX. Respondent shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

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 enforceable.

FOR THE COMMISSION:

LMNoble(JH) — 5/19/92

Lawrence M. Noble
General Counsel

Date

FOR THE RESPONDENT:

Court Shannon — 4/14/92

Name: COURT SHANNON
Position:

Date

9304353287 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 4, 1992

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Court Shannon
356 Pine Crest Dr.
Laguna Beach, CA 92651-1452

RE: MUR 2583
Court Shannon

Dear Mr. Shannon:

On May 19, 1992, the Federal Election Commission and you entered into a conciliation agreement in settlement of violations of 2 U.S.C. § 441f. According to the agreement, you were required to pay a civil penalty of $1,000. The conciliation agreement provided for installment payments, with an initial payment of $500 due on April 15, 1992, and an additional $500 payment due on June 15, 1992.

According to Commission records, your June 15, 1992, $500 payment has not been received. Please be advised that, pursuant to 2 U.S.C. § 437g(a)(5)(D), violation of any provision of the conciliation agreement may result in the institution of a civil suit for relief in the United States District Court. Unless we receive the payment from you in five days, this Office will recommend that the Commission file suit to remedy this violation.

If you believe the Commission's records are in error, or if you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jose M. Rodriguez
Attorney

cc: Jeffrey M. Ettinger, Esq.

9304355387/4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 19, 1992

Court Shannon
Impact Home Entertainment
249 Forest Avenue
Laguna Beach, CA 92651

RE: MUR 2583
Court Shannon

Dear Mr. Shannon:

On August 4, 1992, we notified you that your second and final $500 civil penalty installment payment had not been received and was overdue. On August 17, 1992, you requested a an additional two weeks in which to submit final payment. Accordingly, this Office expects to receive your final payment no later than September 1, 1992. If payment is not received by this date, this Office will have no choice but to recommend that the Commission file suit to remedy the violation.

Should you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jose M. Rodriguez
Attorney

2304353875

06C# 6409

Courter B. Shannon
249 Forest Ave.
Laguna Beach, CA 92651
(714) 497-5548

92 SEP 14 AM 9:22
FEDERAL ELECTION COMMISSION

September 11, 1992

Mr. Steve Hershkowitz
Assistant General Counsel for District Court Litigation
Federal Election Commission
999 E St. N.W.
Washington, D.C. 20463

MUR 2583

Dear Mr. Hershkowitz:

Pursuant to our phone conversation, I am writing to inform you that I am currently unable to make the second payment of my fine amounting to $500.00. I am waiting on a payment that is due from Australia. I believe that I will be able to make the second payment to you by September 30, 1992.

I will call you if I foresee any problems with making that date. Please call me if you have any questions.

Sincerely,

Court Shannon

Court Shannon

9304353238776

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Court Shannon) MUR 2583

SENSITIVE

OCT 27 1992

EXECUTIVE SESSION

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On May 12, 1992, the Commission accepted a signed conciliation agreement from Court Shannon. Attachment 1. The agreement concerned Respondent's violation of 2 U.S.C. § 441f and provided for a $1,000 civil penalty to be paid in two equal installments.

II. DISCUSSION

On May 20, 1992, Respondent was notified that the Commission had accepted the conciliation agreement submitted on his behalf and had closed the file as it pertained to him. At this time Respondent was also provided with a copy of the executed conciliation agreement. Under the terms of the agreement a second and final installment payment of $500 was due on June 15, 1992.

This Office waited in excess of a month from the due date for Respondent to satisfy the second installment of the civil penalty. Having received no payment, on August 4, 1992, this Office sent Respondent a reminder letter seeking satisfaction of the outstanding civil penalty. In response to this communication, on August 17, 1992, Respondent by phone contacted this Office requesting an additional two weeks in which to submit payment. In response to his request, on August 19, 1992, this Office

2304353287

notified Respondent that his payment was due not later than September 1, 1992. This letter also notified Respondent that if payment was not received by the due date this Office would recommend that the Commission file suit to enforce the conciliation agreement. The due date expired without payment being received.

On September 8, 1992, this Office contacted Respondent by phone and notified him that payment had not been received. In response, on September 11, 1992, Respondent submitted a letter stating that he intended to make payment but was presently unable to do so, and that he would be able to make payment by September 30, 1992. See Attachment 2. This date has also expired without payment being received.

More than three months have elapsed from the original due date on the second installment without payment being received. Respondent has been provided ample time in which to satisfy the terms of his conciliation agreement but has failed to do so. Accordingly, this Office recommends that the Commission authorize the Office of the General Counsel to file suit against Respondent to enforce the terms of the conciliation agreement.

2304353287 8

II. RECOMMENDATIONS

1. Authorize the Office of the General Counsel to file a civil suit for relief in United States District Court against Court Shannon.

2. Approve the appropriate letter.

10/21/92
Date

Lawrence M. Noble
General Counsel

Staff Assigned: Jose M. Rodriguez

Attachments

1. Copy of executed Conciliation Agreement.
2. Respondent's letter dated September 11, 1992.

2304353287 9

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2583
Court Shannon)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on October 27, 1992, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2583:

1. Authorize the Office of the General Counsel to file a civil suit for relief in United States District Court against Court Shannon.

2. Approve the appropriate letter as recommended in the General Counsel's report dated October 21, 1992.

Commissioners Aikens, Elliott, McDonald, McGarry, Potter, and Thomas voted affirmatively for the decision.

Attest:

10-27-92
Date

Marjorie W. Emmons
Secretary of the Commission

2304353280

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

Court Shannon
Impact Home Entertainment
249 Forest Avenue
Laguna Beach, CA 92651

RE: 2583
Court Shannon

Dear Mr. Shannon.

On May 19, 1992, the Federal Election Commission ("Commission") and you entered into a conciliation agreement in settlement of violations of 2 U.S.C. § 441f. Under the terms of the agreement you were required to pay a $1,000 civil penalty. The civil penalty was to be paid in two equal installments with the second and final installment payment due no later than June 15, 1992. On August 4, 1992, you were notified that the Commission had not received your second and final installment payment. To date, you have failed to make payment.

As a result of your failure to fully satisfy the civil penalty, the Commission has authorized the General Counsel to institute a civil action for relief in the United States District Court.

Should you have any questions, or should you wish to settle this matter prior to suit, please immediately contact Stephen Hershkowitz, Assistant General Counsel, at (202) 219-3400.

Sincerely,

Lawrence M. Noble
General Counsel

9304353283 1

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3 August 1988

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Federal Election Commission
ATTN: Jonathan Bernstein, Esquire
999 E Street, Northwest
Washington, DC 20463

Re: Deposition of ABRAHAM L. KANTZABEDIAN,
Washington DC, 11 April 1988.

Dear Mr. Bernstein:

Enclosed is the above-entitled deposition, which has been read and signed by the Deponent. One correction is noted in this transcript:

Page 11, line 1: Change "Quest" to "West".

Sincerely,

Edwin G. Crowley
Deposition Supervisor

2304355328382

ORIGINAL

TRANSCRIPT OF PROCEEDINGS

UNITED STATES OF AMERICA

BEFORE THE

FEDERAL ELECTION COMMISSION

- -x

IN THE MATTER OF:

MUR 2583

- -x

CONFIDENTIAL

DEPOSITION OF ABRAHAM L. KANTZABEDIAN

C O N F I D E N T I A L

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2304353288 83

Los Angeles, California

Monday, April 11, 1988

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BEFORE THE

FEDERAL ELECTION COMMITTEE

)
)
)
) MUR 2583
)
)
)

DEPOSITION UPON ORAL EXAMINATION OF

ABRAHAM L. KANTZABEDIAN

BE IT REMEMBERED that, pursuant to Notice of Deposition and on Monday, the Eleventh day of April 1988, commencing at the hour of 9:30 a.m. thereof, at the Federal Building, Room 7210, 300 North Los Angeles Street, Los Angles, California, before me, HARRY ATTMORE Notary Public in and for the County of Los Angles, State of California, personally appeared

ABRAHAM L. KANTZABEDIAN

called as a witness by the Federal Election Committee who, being by me first duly sworn, was thereupon examined and interrogated as hereinafter set forth.

oOo

2304350288 4

For the Federal Election Committee:

JONATHAN BERNSTEIN, Esq., and
CELIA JACOBY, Esq.
Federal Election Committee
999 "E" Street, NW
Washington, D. C. 20463

o0o

2304350288 5

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MR. BERNSTEIN: This morning we are on the record in the matter under review, MUR 2583, a civil investigation being conducted by the Federal Election Commission. And on behalf of the Federal Election Commission here this morning there are myself, Jonathan, Bernstein, and Celia Jacoby.

Investigations -- The Commission's civil investigations are confidential under the Federal Election Campaign Act, Section 437(G)(A)(12). Accordingly, no notification in this investigation should be made public.

This morning, as part of this investigation, we are deposing Abraham Kantzabedian.

And Mr. Kantzabedian, I wonder if you could state your full name, please?

MR. KANTZABEDIAN: Sure. It's Abraham Levon Kantzabedian.

MR. BERNSTEIN: And can you please tell us your address and telephone number?

MR. KANTZABEDIAN: Sure. The address is [redacted] The telephone number is [redacted]

MR. BERNSTEIN: And that's your home phone and your home address?

MR. KANTZABEDIAN: Yes, Sir.

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MR. BERNSTEIN: And your marital status, Mr. Kantzabedian?

MR. KANTZABEDIAN: I'm married for five years, if that's what you're asking.

Whereupon,

ABRAHAM LEVON KANTZABEDIAN,

called as a witness by the Federal Election Committee, being duly sworn by the Notary Public to tell the truth, the whole truth, and nothing but the truth, testified as follows:

EXAMINATION

BY MR. BERNSTEIN:

Q. Mr. Kantzabedian, before we go any further, let me ask you if you are represented by counsel here this morning.

A. No.

Q. And do you understand that you have the right to be represented by counsel?

A. Yes.

Q. And so you have chosen not to be, at this deposition?

A. Well, I didn't choose. I cannot afford one.

Q. Mr. Kantzabedian, what I ask is as follows. Since you are not represented by counsel, please feel

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very free to ask any question or if you are uncertain about any matter, whether it's your part in the investigation -- as we go on, I'll speak in a little bit more detail about the course of the investigation as it affects you, because you are not represented by counsel. But please feel free to ask any questions about anything that might bother you.

A. Sure.

Q. At this point, what I'd like you to do is to read through this three-page instructions for assistance about what this deposition is about in general terms, and if there are any questions about that please feel free to ask them.

(Pause)

A. Do I initial this?

Q. And on the next page, as well.

A. Oh, I didn't see the next page.

(After a pause) Do I sign right here?

Q. Yes.

MR. BERNSTEIN: Mr. Kantzabedian has read the three page instructions and initialed them and signed them, and I am going to mark this FEC Exhibit 1 and hand it to the reporter.

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(The document referred to was marked Federal Election Committee Exhibit No. 1 for identification.)

BY MR. BERNSTEIN:

Q. Mr. Kantzabedian, I think where we left off, can you tell me what your marital status is?

A. I don't understand. Am I married?

Q. Yes. Are you married?

A. Yes, I'm married.

Q. And were you married in the period 1983 until the present?

A. Yes.

Q. And can you please tell us your education, Mr. Kantzabedian?

A. Well, my background is I had college. I graduated high school, took Police Science in college, so mainly law and business law.

Q. And can you please describe your current employment?

A. Current employment, I'm with Cyril's Clothing Store. I'm an assistant manager there. Mainly, it's sales.

Q. Could you please tell us the business address and telephone number?

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A. It's 3333 Bear Street, Costa Mesa, California. Let me see.

(After a pause) The Zip Code is 92626. The telephone number is (714) 641-0250.

Q. And for how long have you been employed there?

A. I've been employed there for about five months, approximately.

Q. And prior to that, where were you employed?

A. Prior to that, I was in the Custom Shop, in clothing. I was a designer.

Q. At the same business?

A. Same address, but not the same company. It was called the Custom Shop.

Q. And for how long --

A. I was there approximately a year.

Q. And what period of time would that have been, from when until when?

A. December of about '86 to '87, December.

Q. You say from December 1986 to December 1987?

A. Yes, Sir.

Q. And where were you employed prior to that?

A. Prior to that, self. I was trying to -- I had a company -- still, I still have it, but it's

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just mainly in the air. It's called Expound Productions. That's E-x-p-o-u-n-d Productions. And what it is was that it puts family photo albums into video albums.

And prior to that, I was with Stuart Karl.

Q. When did you begin your period of self-employment?

A. July of '85. I can't recall the exact time, but it's approximately around July.

Q. So from approximately July of '85 until late 1986, you were self-employed in the business you were describing?

A. Yes, Sir.

Q. And prior to that?

A. I was with Karl-Lorimar. And prior to Karl-Lorimar, it was called Karl Home Video.

Q. Maybe the best way to go about this would be for you to describe how your association with the various businesses with Stuart Karl began and the transformation of those.

A. Yeah. Instead of going backwards, we'll go forwards.

Q. Yes.

A. Okay. I met Stuart Karl in approximately '82, I believe. And I was at that time into modeling and acting. And through an agency, I met him. The

agency's name was New York ~~Quest~~ WEST. Modeling Agency, which was located a quarter of a block away from Stuart at that time.

Q. Where was that, now?

A. In Newport -- in Costa Mesa. His original was -- The shop was at 899 - 16th Street. Stuart.

But before then, before he went to 899, he was -- I can't -- it was very close into the area. I can't remember the cross-street, the street he was on. That's where I met him. Then he moved down to 899 West 16th. Then he opened up another shop -- another office, which is 889 West 16th Street, in Costa Mesa.

Q. Please go on.

A. And I met Stuart, and we became -- you know, they were doing a tape. I got involved. And I pursued it because I saw a future, you know, because I admired the entertainment business and he was in the entertainment business, being a -- starting to be a pioneer into the video industry. I said, well, "This is it." So I pursued, and we got to know each other.

And then Stuart, when I started getting involved with him, he started a company called Flash, Incorporated. Flash was just a fictitious company, just to see if I'm going to be as loyal as I say or looked to him at the time.

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So I started, and I was there every morning. And --

Q. Why did you describe it as a fictitious corporation?

A. Because nothing ever became (sic) out of it. All we did was -- All my duty was to build a company of posters to -- you know, to come out with new ideas and everything. But we never got to finish it to the point to start doing it because I left. He pulled me out of that and put me with him.

Q. So were you an employee of Flash, Incorporated? Is that what you were saying?

A. I was an employee of Stuart Karl. The checks weren't coming out of Flash because there was no checks at the time.

The company was about two months, you know, so it wasn't really -- we didn't even give the chance for it to go.

So Stuard, when he saw me putting the effort into it, then he -- at that time, we were starting to do Richard Simmons Workout or we were doing something with Richard Simmons. And he said, "Well, since you are dependable, you're on time and I can see you can handle it because you're handling one thing" -- I accumulated a lot of information about poster companies in

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that one month that he says, "Well, why don't you just leave that alone and just come with me, work with me and be my assistant." And from there on, it's just one thing led to another, and I became very close to him, closer and closer as the years went by.

Q. What was the first corporate entity that you were an employee of?

A. Karl Home Videos. You're asking me what was the name of the company?

Q. Yes.

A. Karl Home Video.

Q. So was that, in effect, the next company after Flash, Inc. that --

A. Well, Flash, Inc. was --

Q. Temporary?

A. -- temporary. So I couldn't even -- you know, I'm just telling you that for your records of whatever. But it wasn't even something. I'm just telling you how it all started, and it was one of the tools that -- you know, a reason that I was there.

And we moved on from there and started growing. You know, Jane Fonda started doing good and Richard Simmons and other tapes and distribute them. So one after another, we just -- from 899 West 16th Street, we moved down. We made our headquarters at 889,

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where the other side was all sales and marketing.

Q. And can you recall what -- you know, the approximate date this would have taken place, when you became an employee of Karl Home Video?

A. I can't recall the exact date. '82, '83. You see, the time that I met Stuart, you know, he was paying me out of his personal, so I really myself don't know when I was a "legit" employee of Karl Home Video until later on as it got -- you know, we got bigger and everything. Then I was on a salary. Starting there, I got onto a salary. So exact effective date, I don't know.

Q. Now, you're saying that even at the time when you were providing services for what was Karl Home Video, you still may have been paid from Karl's personal account?

A. Yes, Sir. I became real close to him and he trusted me. We -- He really didn't trust too many people. You know, he didn't feel comfortable with too many people. I became his right-hand man, as you would call it, and dealt -- went with him wherever he went and took care of things that he wouldn't want any other people to see or to hear, personal matters that you wouldn't want your other associates to find out what you're doing. And I became more and more deep involved

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with him.

Q. Maybe you can tell us next -- and I'd like to get back after a bit to exactly what your duties were and how those duties may have changed over time. But maybe for our information, you can tell us your best understanding of the -- what I guess I'd describe as the corporate transformation. Can you do that for us?

A. I don't understand that corporate transformation.

Q. Did Karl Home Video change -- Did the status of Karl Home Video change?

A. When he started growing, yes. Is that the question?

Q. That's the question.

A. Okay. Yes, when it started growing, he sure changed. He changed where -- Jane Fonda was doing real well, and there was, I believe, at that time a rumor that Lorimar was ready to purchase Karl Home Video.

Q. Was Karl Home Video a public company at this time or a private company?

A. As far as I know, it was -- As far as I recall, it was a private company at that time. And they merged. Before merging, you know, he started getting big, so everything started -- you know, it was a different type of an atmosphere, more serious, more

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where before the salespeople used to come without a tie or a suit, now they started coming to work with ties and suits on.

Q. What time period would this have been?

A. This would have been, if I could recall the -- about '84, end of '84, around that time. I still can't recall the true -- because I don't know. Beforehand, they were having secret negotiations going on. So that could have been from, God knows --

Q. An earlier period?

A. Earlier period. Where it came to us was, you know, approximately, I believe, '84, around that time, if I recall.

Q. And what happened then?

A. It became -- When they merged, they stayed at the area in Costa Mesa. Then they got an office in Irvine on Cowan Street. I can't recall the exact address, but it's in Irvine on Cowan, which it became Karl-Lorimar Studios. Then from there on, you know, they just grew bigger and bigger because they had the support of Lorimar.

Q. What's your best understanding of the legal relationship, as much as you do understand it, between Karl-Lorimar and Lorimar Productions -- Lorimar Telepictures, I guess?

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A. The difference with Karl-Lorimar Productions has to do with videos, okay, anything that goes to video stores, to public and in-house, where Telepictures is, you know, they have to produce for television, like Dallas and all those shows they do.

Also, I believe Karl-Lorimar also has the motion picture, which is the Telepictures also.

Q. Tell me, is it your understanding that after the merger or whatever the transaction that took place was, that Karl-Lorimar Home Video was a subsidiary of Lorimar Telepictures? What the corporate relationship was.

A. Okay. The corporate relationship, sure, they're another branch of Lorimar, different branch, different market. Lorimar hadn't been -- as far as I know, they hadn't been in the video industry, so this was -- my understanding was that at the time this was a step for them to get involved in the video market. So they -- it was connected with Lorimar, but Stuart Karl ran it.

Q. And after the merger, did Karl Home Video continue to exist?

A. No. It became -- As far as, again, my recollection, no, it became Karl-Lorimar Home Video.

Q. So as far as you can recall or you under-

stood, there didn't continue to be an entity called Karl Home Video after the merger?

A. Not as far as I know. But Stuart had, you know, other projects that he dealt with out of the company with other people. He would keep those confidential. So if they had a business going as Karl Home Video, using that name, which I doubted because he would have got into big trouble using the name -- that's what Lorimar bought him for, to take parts of his name and to -- you know, so if he still kept on using Karl Home Video, he would have gotten caught. But as far as I know, as I recall, I don't remember him using the company.

Q. What I'd like you to do now -- and, as I said, we'll get back to in quite a bit more detail your duties and responsibilities. But what I'd like to do now is to ask you -- the Commission mailed you by certified mail, Mr. Kantzabedian, a package, and the package contained a notification to you that you are a respondent in the Commission's civil investigation. And it also contained a form procedures which related how our civil investigations work. Additionally, it contained a subpoena which required your appearance at this deposition, and also included a request for the production of documents.

Did you receive that package, Mr. Kanzabedian?

A. I sure did.

Q. And was there anything that -- any question you'd like to ask now on the record about the package? Was there anything that you didn't understand, that wasn't explained sufficiently?

A. Well, as far as my understanding, I understand it.

Q. Let me -- Let's do it this way. Since you're not represented by counsel, let me state briefly how the Commission's investigatory processes work because it's very important that you understand completely what your role is and what's happening.

In the Commission's civil investigations, it makes reason to believe findings which are a threshold for the Commission to commence an investigation. The Commission found reason to believe that you may have violated a provision of the Federal Election Campaign Act by being reimbursed for a contribution that you might have made to a federal candidate.

In addition, as we indicated in the subpoena, the Commission considers you in part a witness in this investigation to seek information that you may provide beyond the particular finding against you that

the Commission has made. All right?

A. Okay.

Q. And as the procedures that included state, beyond the Commission's reason to believe finding, the Commission conducts an investigation and it can receive requests for what we call pre-probable cause conciliation which respondents may request in order to resolve the matter. If a matter is not resolved, the Commission can then proceed to what is called probable cause, which is the next threshold finding.

And after a probable cause finding, the statute then contemplates that the Commission will engage in conciliation to resolve the matter.

The procedures, you know, go on farther. I don't think it's necessary to state it at this time, but is that clear to you, Mr. Kantzabedian?

A. Yes, yes.

Q. Regarding the subpoena for documents, I wonder if you could tell us what efforts you made to comply with that subpoena, the request?

A. Okay. The same subpoena that I had from the FBI to come out with the documents, I -- the only thing that I can come up with is I had some materials that I gave to the FBI. And I can tell you the agent's name that you can get in touch with, and I'm sure he

probably -- You know, I don't know if there were any of importance or not.

Q. Mr. Kantzabedian, you can actually provide us with that information later, and that needn't be on the record.

A. Sure.

Q. But let me ask you this. Can you describe to us, as best you can, with specificity, what documents you provided to the FBI?

A. Well, I had -- well, what it was is that Stuart Karl had a lot of flights, Lear Jet flights, but I wasn't sure what was used for political and what was not used for political. So I had -- they wanted my name. So I had that to my possession, which I gave that to the FBI.

Q. What sort of documents?

A. Such as flights, prices --

Q. Do you mean invoices?

A. Invoices, yes, Sir. And that's the only materials that I had. I mean, I didn't keep much stuff. I mean, you never think that you'll ever be needing it for a certain reason.

And as far as the checks are concerned, I haven't been able to locate those. But I did give them the information of the bank and the account number

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that they will, you know, pursue on that.

Q. So so I understand correctly that the only documents that you were able to provide that would have been responsive to this subpoena were invoices relating to air transportation?

A. Yes, Sir.

Q. Can you tell us if you consulted with anyone to prepare for this deposition, Mr. Kantzabedian?

A. No, Sir.

Q. Did you use any documents to prepare for it?

A. No.

Q. And --

A. Documents as evidence, bringing in evidence?

Q. Or anything, anything in writing.

A. No.

Q. Other, obviously, than the materials that we sent you.

So, to your knowledge, Mr. Kantzabedian, did you read the Commission's request for the production of documents?

A. Yes, Sir.

Q. And, to your knowledge, are there any other documents that would be responsive to that other than

what you've just told us about?

A. No, Sir. I -- just the ones that I -- those were the only documents in my possession, you know.

You see, where I think the confusion is being, you know, is I have marked it -- They have put me here, or as far as the information that you received, they got me down here as being identified as a financial officer at Karl Home Video, Karl-Lorimar, so thinking that I would have a lot of documents. I was never a financial officer, no.

Q. We'll get back to that, actually, just in a moment and we'll give you plenty of opportunity to describe what your status exactly was.

A. Okay.

Q. And we are very much interested in you clarifying or correcting whatever information we have to help us understand exactly what took place.

I think at this point let us go back to your initial association with Karl Home Video. Please tell us, to the extent that you can remember, what your initial job title,duties and salary were.

A. My job title was as an assistant to the president of the company. My duties -- and, also, I had the associate producer title when we do the tapes or whatever the show we did. Let's see. What was the

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question again?

Q. That was your initial title?

A. Yeah. My initial title was, you know, as assistant to the president and being an associate producer.

Q. And when you say that was your initial title, do I assume you mean that that would have been when you first went on salary from the company?

A. First time when I went on salary in the company, I was more -- yeah, I was an assistant to him, because I did everything an assistant would do. And I didn't have a title. I didn't -- I wasn't called as a --

Q. When you were just paid from Stuart Karl's personal account, you had no need for a title? You worke for him, but --

A. Exactly. There was no title set on everybody there at that time, so -- but everybody knew what their territory was, more or less.

Q. And before you went on the company's payroll, what sort of salary were you paid or on what basis were you compensated?

A. As far as I could recall -- now, I don't know when he was paying me if it was company or personal; okay? But I believe at that time, if I could recall,

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I recall maybe $1500 a month, something like that, at the beginning. Then it went to $1700 a month.

Q. Were you paid then on an hourly basis or just --

A. No, Sir, I was on a salary. I was never on a -- I wish I was on hourly.

Q. So your recollection is that you were paid initially about $1500 a month?

A. In the beginning, yes. And then it went to $1700.

Q. Do you remember when that would have been?

A. Ending of '83, beginning of '84, as long as I could recall on that. I don't know exact times. Everything -- Nothing was done properly for me to know the dates. You know, it's not like you and I sitting down today and saying, well, 9:30 in the morning I'm here and -- you know, it's nothing that -- final said to register in your mind so you could recall exact dates.

Q. Well, let me ask you this. Presumably you were paid by some sort of written instrument, a personal check --

A. Yes, Sir.

Q. -- your salary or your compensation. So initially were those checks written on what looked to be Stuart Karl's personal account? Do you have a recol-

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lection about that?

A. No, I don't recall that. Everything had his name on it, so . . ..

Q. Well, I guess what I'm trying to figure out is how would you have recollected when you actually became an employee of Karl Home Video? What would have marked that transition?

A. By me working on the Richard Simmons show, by me officially getting involved with the production the label is on there with Karl Home Video.

Q. Do you remember when you first started receiving Form W-2's, tax withholding forms, from Karl Home Video, for what tax year?

A. I can go back and check. It had to be around '83 or '84, you know.

Q. If you could check your tax records, Mr. Kantzabedian, to clarify for us that, we would appreciate it.

A. Sure. I'd be glad to.

Q. And can you please now tell us -- I think you'd begun to say that you started working on the Richard Simmons video?

A. Yes, Sir.

Q. And what sort of things did you do?

A. As far as my responsibilities?

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Q. Yes.

A. As as an associate producer or as an asistant to Stuart Karl?

Q. Both, in whichever order you prefer.

A. Okay. As an associate producer, it was my responsibility to overlook all the projects, to take care of the crew, to take care of any loose ends such as, you know, somebody forgot to bring the machinery or a cameraman got sick. I always had a back-up to a back-up when the production was going. So it was my role as an associate producer -- was to check the budget, to make budgets, to cut budgets and to make sure that the project started from A to Z and it goes hand-delivered finished.

And as an assistant to Stuart Karl --

Q. Maybe, before you go on, you can tell us, that was regarding the Simmons tape?

A. Yes, Sir.

Q. And did you subsequently act in the same capacity for other such projects?

A. Whatever I did, it was the same duty. Jose Eber, which was a hair tape, beauty tape, it was the same thing.

To be -- the title that you have as an associate producer is just a title. Your -- The work

that you'll be doing is as if you were the one who started the project, like you're the money man. I mean, you got to hang in there. You got to make sure the project is well-done and finished because your name is going on it, also. It's a credit that you build up. So you -- Everything that you would think that will harm the project, you avoid it.

Q. And who would you have reported to as associate producer or is that a relative question?

A. I still don't understand the question.

Q. Who would you have reported to? Who would you have been responsible to?

A. Oh, Stuart Karl, to the producer.

Q. And Stuart Karl was the producer of these?

A. Yes, Sir, producer and -- I mean, he's the producer and it's also his company name going on it. So any fault or any problems that happen, you have to report to him.

Q. Please go on and describe your duties as assistant to the president.

A. When I was being assistant to Stuart Karl -- you see, Stuart Karl had a thing of -- Howard Hughes was one of his idols, I believe, you know, and he always wanted for me to be, as Hughes' assistant was to Hughes, me to him. So my ability -- So my title, actually, my

duties didn't have a scale of certain duties. It went up and down like a heartbeat. So I didn't have one certain type of a duty to take of with Stuart Karl.

Whatever it was. I mean, if it came down to cleaning his toilet, he didn't want -- he was so private that he wouldn't even let the cleaners go in there to pick the newspapers up. That's how private a man he is.

And he's very conscious and -- I say, well, you know, that's -- I mean, he felt comfortable me taking care of him. You know, it's like being -- seeing Radar in Mash. That's how it was. Before he said it, he would have it. You know, if he wanted a drink, I knew when he wanted a drink. You know, whatever it is -- we got so close that he wanted to be like that or no way at all. So you were more or less pressured to be very conscious about everything, you know, what his comforts are.

So to answer your question in as short as way as I can, is being his assistant is to take care of him.

Q. And do I gather that, from your answer, in that capacity there was less participation in business activities and more in supporting his personal comfort, personal activities? Is that right or --

A. Well, yes. His business activities were

kept confidential. I got involved as an innocent bystander, you would call it, because I had to be there to tell him something or whatever. Or I was with him when he went. But as far as a lot of conversations, it was closed doors. I myself had to be excused.

Q. So you weren't privy to a lot of these discussions, although -- so you were his right-hand man in some capacities but not others; is that what you're describing?

A. Yes, Sir. You see, a lot of things I would overhear, you know, being in a room or whatever. But officially going and sitting down in a board room -- I was going to meetings that has to do with me, meaning that my department as being an associate producer or whatever my duties -- You see, my duty was to butcher budgets. Butchering budget is a way that if you have a project and you come to me with a project and you put a, for example, hypothetical, ten million dollar budget in front of me, well, it's your project, it's your budget. Well, I was trained to the thing -- I knew a lot of people and I knew the industry -- that I would take the budget and I'd say, okay -- Stuart will say, "Find out if the guy's telling us the truth, if that's what the actual costs would be on this motion picture or on this video, whatever." I would physically call the peo-

ple up and ask them the costs and this, and I added it up myself. And most of the time you find out there is, you know, five, six hundred thousand dollars or a hundred thousand dollars extra playing around in there. So that's what I would do, one of my duties would be with him.

Or -- and view shows. As far as going back to the meetings, going back into the meetings is that physically sitting in a very high, top confidential meetings, no. I couldn't be there. Mainly, it was him and the person that he is having the meeting with.

Anything that had to do with entertainment, yes. You know, we had to be there because later one he would ask us for an opinion. So I had to give an opinion. I couldn't give an opinion on something that I didn't hear from the person.

Q. You mean, for example, proposals for new projects?

A. Proposals for a project, yes, Sir.

Q. Can you maybe just give us a list or describe to us, back on the other subject, as associate producer -- can you list for us the different projects you worked on?

A. I worked on Richard Simmons, Jose Eber. Then we had a lot of projects that were stand-by proj-

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ects, okay, a project that never fell through.

Q. You mean that never carried through?

A. Never carried through. So I spent a long time on projects like this, dead projects.

Q. Tell us about them, or list them, at least.

A. I can't recall the names. You know, there was so many of them. All I would do is view the tape, view the samples, go through the script, read the script to see if it has potential in it and give a written input to Stuart Karl, what I thought of it personally. And he would go to the secretaries and a couple of other people that he would choose to view the films or whatever and give their opinion.

Stuart Karl was a lot of times -- I can't think of the word -- when somebody drags things. There's a word for it. Somebody who always avoids things.

Q. Procrastinator? Is that what --

A. There you go, uh-huh. Because he'd let things wait and wait and wait. That was one of the problems. So that's why a lot of the projects never really physically got done.

Q. And how about the ones that were completed?

A. As far as the completion, I was involved in -- again, back to Jose Eber, the beauty tape, Richard Simmons. There was another one; I can't recall the name

of it.

Q. Were you involved in the Jane Fonda tape?

A. No. As far as physically, no. I was involved with the Jane Fonda tape being with Stuart, him being involved in it. That's the only involvement I would have with it. As far as producing it or associate producer or having any credit of it, no. I would have loved to have it, but I never got it.

Q. Do you recall if one of the projects that never carried through related in any way to Gary Hart for his presidential campaign?

A. There was one that, you know, Gary Hart did. They were doing a film, as far as I could recall, commercial advertisement or whatever, something like that, that never got finished. All we saw -- clips were taken from live Hart campaign, and that's all I saw. That's all everybody else saw.

Q. When would that have been?

A. That, as far as I could recall, it would have been about in '84.

Q. Was it in the middle of the presidential campaign, at the beginning, at the end?

A. It was in the middle, as far as I could recall. I'm trying to remember, you know, how it worked. But as far as I know, he was already involved, and so

I could recall he was already involved with Hart. And then things started coming out.

Q. Do you remember there being a -- Were you requested to give an opinion on that, as with the other projects, or not?

A. Usually, you see, the thing -- we were -- one thing about the Hart thing -- when we do a show, we would have a budget. Now, any campaign or anything is considered the program, a show. Without a budget, you don't have a show. I never received a budget to even go through with it. So there was no budget set, as far as I recall, for me to see.

Now, if they had a budget and they concealed, then that's something I had no control over.

Q. Let me ask you more general questions about Karl Home Video.

Did you want to --

A. Yes, if I may make a point, too. A lot of people didn't know what my responsibilities were at Karl Home Video or Karl-Lorimar. Stuart kept me pretty well confidential. And through your investigation, you'll find that out, too. A lot of people thought I was the driver. A lot of people thought I was, you know, bag man or whatever. Not too many people knew what my responsibility or my duty was. I, myself, a lot of times

didn't know.

Q. Maybe actually this may explain why your answers to the questions we ask may not be as complete as we'd like, but let me ask anyway.

Can you tell us who the directors of Karl Home Video were, the corporate directors?

A. Karl Video? Dennis Blackburn, Court Shannon. Those are the only -- and Stuart Karl himself -- the three that I know as far as -- In the beginning it was Dennis Blackburn and Stuart Karl. Then Court Shannon got involved. That's about it, as far as I can recall. There were three of them, total. Then it grew. It became bigger and bigger. Then Court Shannon became -- when it became Lorimar, Court Shannon became V.P., vice president.

Q. Well, would it be useful, if we wanted to have as complete as picture as we can of actually trying to ask you questions or understanding what the structure was prior to Lorimar getting involved? Would that make sense?

A. Yeah.

Q. So you were describing in the beginning that you recall that there may have been three directors at least that you can remember, and you gave us their names.

A. Yes.

Q. How about officers of the company?

A. Again, probably the three of them, again. I mean, officer -- chief operating officer would have been Dennis Blackburn, one. And Court Shannon was in the marketing, you know, at that time, too. But the three were pretty close together at the time. But as far as legally, it would be Dennis Blackburn.

Tape 2

Q. What was Karl's title or position?

A. President of the company.

Q. Was he chairman of the board, too?

A. I believe he was. I mean, I can't recall. I'm sure he had to be.

Q. But you don't remember the names of any other individuals, at least at that stage before Lorimar got involved?

A. Yeah. At that stage, I don't remember. You see, the board -- when you say the board, that's small, you know. It's not --

Q. There are not a lot of formalities?

A. Yeah, it's not formal. I mean, everybody was down to earth, you know, with each other, and the atmosphere was great. There was no argument. If you had a problem, you go either to the -- if you had a money problem, you go to the chief operating officer, and if

you had personal problems or relating to whatever it is, you go to Stuart Karl. So it wasn't like a big board room and everybody -- We had a board room, and we all sat down and had lunch, you know. We kept -- Mainly, we kept in a very down to earth basis with each other.

Q. How many other employees would Karl Home Video -- did Karl Home Video have?

A. At that time?

Q. At that time.

A. I would say maybe about, as far as I could recall, maybe about thirteen people, you know.

Q. And that would have been the extent of it prior to Lorimar's involvement?

A. No, it kind of grew before Lorimar got involved. It became maybe about -- maybe about twenty people, twenty-one, twenty-two people.

Q. And were there -- at that point, in other words, at the height, if we can put it that way, before Lorimar's involvement, were there other individuals who you can recall were officers, became officers of the company?

A. No, I can't recall that.

Now, when you say how many people got involved, you see, a lot of people were involved that weren't even there.

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Q. How so?

A. Well, as far as being involved with Karl Home Video, being an employee. Like, E. J. Ocean (phonetic) worked out of L.A., out of her home. So there could have been a lot of other people that I wasn't aware that was on the payroll. Do you understand what I'm saying?

So as far as you asking me how many people were at the place of Karl Home Video, that drove to work -- getting closer to the transaction happening with Lorimar, I would say approximately, you know, twenty, twenty-one, twenty-two people, around that average.

Q. How many other -- I'm sorry. You gave as an example Ocean?

A. E. J. Ocean. It's not an example. She did work. You have her name in there, also. She was more of another assistant in a different department to Stuart Karl. And that was based out of L.A.

Her duties was to get connections going. If Stuart Karl wanted to meet an actor or an actress or whatever, she would get the people. She would make the arrangement for Stuart to meet them. She was a connection lady.

Q. And were there other such people at that

time that you can remember?

A. Well, he had an agency that -- out of Beverly Hills, Rogers & Cowan, something -- I can't recall the name -- but that also did the identical thing that was on a payroll with him.

But as far as -- such a long time to recall, I --

Q. Yes, I can understand.

A. I can't really recall.

Q. Can you tell us, at that point, what other Stuart Karl entities, other businesses or projects or corporations that Stuart Karl might have had?

A. At that time, I -- not that I -- I don't think so he had any, as far as I can recall, because he was too concentrated on one area. He probably had investments, like any other businessman would have, but as far as running other businesses at the same time, no, not that I could recall.

He had Karl Home Video. He had Karl Productions. ±

He did get once involved into music, wanted to produce a record, but that just didn't work. It just didn't go through.

Q. Was Karl Productions a separate corporate entity?

A. That part I really don't know. I can't recall.

Q. When was Karl Productions the most active, to your recollection.

A. Well, Karl Production did the producing of the shows, and Karl Home Video distibuted them. So you had two different divisions but under the both the same -- you know, a subdivision of Karl Home Video was Karl Productions. You know, it was --

Q. So it was the same group of people that you --

A. Oh, yes, the same. We were just in a different office.

Q. In that period before Lorimar got involved, were you in any way involved with the financial books of the company?

A. No, Sir.

Q. Who --

A. Are you talking -- When you say "financial," are you talking about the whole company; right?

Q. Yes.

A. No.

Q. Whose job would it have been? For example, was there a controller of the company at that point?

A. Yes, Dennis Blackburn was the controller

at that time, but then he got another person in there to take over Dennis' place. I can't recall his name. Let me see if I could remember his name from -- (pause). Okay, Lutkins, John Lutkins, I believe is the name. John Lutkins, yeah, became the chief operating officer for Karl Home Video.

Q. And when was that?

A. I can't recall that. I can't remember.

Q. But it was sometime before Lorimar --

A. Yeah, before Lorimar take over.

Q. B.L./A.L., before Lorimar, after Lorimar.

A. Yeah.

Q. Do you know what banks Karl Home Video used?

A. I know one of his personal accounts was from FIB, First Interstate Bank. I do recall that. I'm not too sure, but I believe it was Bank of America.

Q. Do you know how many corporate accounts there were?

A. No, Sir.

Q. And, again, you believe that Mr. Blackburn and Mr. Lutkins were the two who would have been most knowledgeable about the company finances?

A. Yes, Sir.

Q. Are there any other employees whose job

it was too manipulate the corporate books or supervise them?

A. There were -- unless you call the secretary or assistant to them. They had assistants that would help them. Like, John Lutkins had his wife help him. She didn't -- well, I can't -- let's see.

Q. For the record, the witness is now consulting a list of individuals in the Commission's Factual and Legal Analysis that was sent to him on page three, footnote two. Is that correct?

A. Yes, Sir.

(After a pause) I can't recall her name, but he had a -- Dennis Blackburn had an assistant that she wrote a lot of checks, so she would know the corporate books. She knew where the checks went, who and what for. But I cannot find her name or recall her name.

Q. Is there anything that could --

A. Cathy Bergman -- Cathy, her first name is Cathy. Bergman? I can't remember her last name, but her first name is Cathy. I can't remember her last name.

Q. Well, if that comes to you, maybe you could let us know.

A. Sure; I'd be glad to.

Q. Were there any other secretarial people or clerical people or other people who were involved with --

A. Now, are we talking about before --

Q. Still before Lorimar.

A. But in between. I mean, just in the -- I mean, he had bookkeepers that would come and do stuff.

Q. Were they employees or --

A. No, they weren't. They were free-lancers.

Q. Do I gather, did there come a time that Karl Home Video was audited by outside auditors before Lorimar?

A. There was a time he was being audited, but I don't know what the reason was for, why he was being audited.

Q. Was this by private auditors? Accountants?

A. That I can't recall, if it was private or government, you know. But I know that they -- he was sweating.

Q. When was that?

A. I can't remember. This is in the beginning, we're talking.

Q. Prior to 1984?

A. As far as I can recall, prior '84. Or it could have been Lorimar just wanted to find out.

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I don't know.

Q. So do you know who was authorized to sign checks that were drawn on the corporate account or accounts?

A. In the beginning, it was Stuart Karl. Then I believe he gave Dennis Blackburn authority to sign, also. So Dennis had -- would issue checks with his signature. They had some kind of agreement on that. I don't know. One had to check the other one, why the check was written out or -- but being the chief operating officer of the company, I'm sure he would have gave him authority to sign a check.

Q. Now, again, what personal accounts of Stuart Karl's were you familiar with?

A. I know one for a fact he had First Interstate Bank, FIB. The other one, as far as I could recall, I believe -- I believe it was Bank of America, but I'm not too sure about that.

Q. This is a personal account of Stuart Karl?

A. Oh, personal. Personal was the First Interstate Bank.

Q. Did he have only one account or more than one?

A. He had more than one, but the one that I am familiar with is that. Also, I think there was

another one called Bank of Newport, Pacific Coast Highway in Newport Beach, that he had a personal account there, too. And the other ones, I can't --

Q. Do you know who had authority to sign checks on each of these accounts?

A. Him. As far as I know, he was the only one signing them.

Q. Did he ever --

A. You see, the questions that you're asking about, the area that we're going into -- see, he's a very cautious man, you know, as far as who has the authority on everything. When it came to money, it was him. You know, he didn't let anybody else know how much money he had. Sometimes he would -- you know, the day that he was excited when he sold Lorimar. He showed me a million-something, as far as I could recall, on a deposit book. But, I mean, that was out of excitement, you know, that he showed it.

But as far as the questions that you're asking, as far as me knowing who had the authority and everything, I don't have any knowledge or -- as far as him, that he had given it, who -- you know, he wouldn't talk about things like that. His accounts were very personal to him.

Q. Mr. Kantsabedian, do you -- is the name

Rama White familiar to you?

A. Yes. Rama White was Stuart Karl's secretary and another assistant.

Q. And do you know what her responsibilities were, again, before Lorimar?

A. Any secretarial responsibility. You know, I really didn't pay attention what her responsibility was because I was too much doing my stuff.

Me and Rama communicated a lot. Stuart would tell her, and she would tell me a lot of times what to do because he would be out. So her duty was to make sure that things would get done. You know, she was under the gun all the time.

Q. Did she -- Was she involved in her personal affairs as you were?

A. Yes, Sir. She more or less knew what was going on than I did. A lot of them, I knew more than she did becaues he didn't want her to know. But I would say she would know ninety-nine point nine percent of the affairs of Stuart -- personal affairs that he had, she would know.

Q. And --

A. She would know more in a lot of stuff also because she was taking care of one of his bank accounts, personal bank accounts.

Q. And which personal account was that?

A. I believe it was First Interstate Bank. I can't -- I'm not sure about -- you know, I could recall the --

Q. And that was the account that you were the most familiar with?

A. Yes, because -- I got familiar with that account because sometimes I had to make deposits for him. Or a couple of times he needed cash, so he gave me his window express card that you go up to the window, Versatel, to get cash out for him. That's how I became familiar with his account. But constantly being involved with the accounts, no.

You know, I'm not familiar with -- you know, that's not how I got familiar with it.

Q. Do you know, did Ms. White have authority to sign checks on any of --

A. Yes.

Q. On which accounts?

A. Again, I believe it was First Interstate Bank account. I'm not sure on that. But she did have it because she would sign it "Stuart Karl," and underneath she would sign it, "Authorized by," you know, and the signature would be "Rama White." You know, she had a signature.

But, you see, Stuart had, you know, so many accounts that we didn't know about. He had accounts for his personal stuff, business, then some other personal stuff. I'm not going to go ask my boss, you know, "What the hell you got all this money for," you know, "What are you doing?"

Q. Who else other than Stuart Karl himself -- is there any one person who, you know, would have been -- who would be the most familiar with all of them, or not really?

A. You can't really pinpoint down to one individual and say, "Do you know everything," because it would be very hard for that one person, individual, to truly come out and say, "Yes, I know every little account," unless --

Q. Because he kept everything close to his chest?

A. Yeah, unless you go to his bookkeeper and you go really to his attorneys and bookkeepers, sure, they will know. They'll tell you, yeah, if that's the question.

Q. I wonder if we can now go on to A.L., after Lorimar. And can you tell us your recollection of what happened, what transition took place after the merger?

A. Such as -- I mean, I still don't under-

stand.

Q. Well, what don't you start with what tangible signs were there that something new was happening.

A. After Lorimar?

Q. Yes.

A. Well, the big movement going into the Irvine -- I mean, here's an empty building. They took the empty building and made offices out of it. I mean, you know that they're not doing this for fun. They're doing it for business.

Q. So after the merger, Karl Home Video became Karl Lorimar Video and moved to Irvine?

A. Irvine.

Q. And did everybody move?

A. Yeah. Oh, yeah. As far as I can recall, everybody moved. They moved all his offices. And he kept one of the office, 889 - 16th Street, he kept that for a while. And then he gave it -- a friend of his, I suppose, rented it, you know, took it from him. He kept the back office for his father, just to, you know -- I believe his father was retiring, so something for his father to do. But, now, what the duties were on that, I don't know. I mean, you know, his father was in the leasing business, automobile.

But as far as the growth and everything,

I mean, you know, the company got big. A lot of faces came about that nobody -- you know, I don't -- knew who they were, where they came from, you know. So it became so big that all my concentration was with Stuart. Everybody else, you know, I could care less, because everybody -- there was a lot of people that I didn't even know in the company. They just started, were sent from Lorimar, or I don't know where they came from. So everybody had secretaries and these -- a lot of new people came in. You know, the firm got bigger.

Q. Who were the directors of Karl Lorimar Home Video?

A. I don't know.

Q. Do you remember if additional individuals besides Blackburn, Karl and Court Shannon --

A. You see, Blackburn was not at Karl Lorimar.

Q. Oh, he had left?

A. Yeah, he had left. He had left at Karl Home Video.

Q. When did he leave?

A. I can't recall that because, you know, they had a big conflict there, so I don't know if he was still on the payroll or if he was -- you know, I found out about it, you know, afterwards, that --

Q. What was the conflict about?

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A. That was personal between Stuart Karl and him. He was -- Dennis Blackburn was having family problems. His wife was sick in the hospital, and he couldn't deliver -- or being there on time. I don't know. It was personal reasons, I guess, between them. Not doing the job right, not presenting himself well. You know, you'd go to a meeting and the guy had golf pants on, you know. So little things like that added up, and Stuart one day, I guess, blew up.

Q. And that was in 1984 sometime?

A. Yeah, as far as I could recall, around that time.

Q. So then once Blackburn had left, the influential people, the highest ranking people at --

A. Well, Court Shannon became vice president of the company.

Q. Yes.

A. And Stuart Karl. Then they had -- chief operating officer, I believe, at that time was Lutkins, John Lutkins. I mean, he handled all the booking (sic) and everything, book -- and Cathy was -- she issued checks. Everything was computerized. And Stuart would sign the checks.

So, I mean, everything started disappearing. You know, you didn't one solid line anymore. The

line became, you know, a thousand branches. So before we used to get things done real fast. Now you got to go through this -- you know, see Frank, see Joseph, on and on and on. By the time you get it done, you say, "Heck, I don't even want to do it."

Q. What other officers came to the business after the merger?

A. I don't -- I can't recall. I don't remember, to be honest with you.

Q. Well, can you refresh your recollection by looking over the list in the Factual Legal Analysis again?

A. You see, what I see on the list, I know the people, you know, most of the people. So this -- all the people -- Okay, I'll give you their names. For example, Dennis Blackburn was no longer in Karl Lorimar. He was in Karl Home Video. Elizabeth Bergman, she's still at Lorimar. I left in 1985. I left when Lorimar -- Pierre Loubet was still at Lorimar. Rama --

Q. Maybe the best exercise would be for you to describe, as best you can --

A. Okay.

Q. -- what the titles and responsibilities of these people were.

A. Elizabeth was a secretary.

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Q. To who?

A. To -- I'm trying to think who she was secretary to. Let's see. I'll come back to that one because I can't remember who she was secretary to.

I was assistant to Stuart Karl. Pierre Loubet was in the marketing and sales.

Q. Did he have a title?

A. He was in sales. I don't recall him having a title. He could have had a title.

Q. Was he a supervisor or sort of a line person or --

A. He controlled -- yeah. He was called public relations probably would be his line, I mean, his title.

Rama White, being an assistant and a secretary to Stuart Karl. E. J. Ocean was in the public relations, trying to get meetings with Stuart Karl. Court Shannon being the vice president.

Q. I'm sorry. Now, Oceans was the one you had described as working originally from her home or from outside the company.

A. That's right.

Q. Is there a time that she joined the company, moved into Irvine to work?

A. No. She moved in in the Lorimar Studios

when they joined together or merged. She went to Lorimar in L.A. and got an office there in the studio.

Q. So she was no longer a part of --

A. She was. She was, but she was a branch of Stuart Karl, Karl Lorimar. You see, when it merged to Karl Lorimar, you see, Lorimar supplied offices there, too, for employees.

Q. Oh. How many employees of Karl Lorimar were actually housed at --

A. Only one. E. J. Ocean, as far as I can recall. Again, later on more added on the list. I can't -- you know, I don't know that.

Q. So was she a liaison or --

A. E. J.?

Q. Why would she have been housed at the parent company's offices?

A. She was -- you know, she did a lot of the leg work for Stuart. You know, if you're a celibrity and I want to meet you, I want to do a project with you, she was the leg work. She did the leg work.

Q. So it was sort of high profile and therefore the desirability of her being located at the parent?

A. Exactly. And, then, she lived there, too, so she didn't want to relocate, move down here. So, you know, if the office is available, they took it.

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You know, why not?

I believe Elizabeth was, as far as I can recall, secretary to Harold Weitzberg, Harold's secretary. Now, Harold Weitzberg was, like, the manager of all sales. You know, he handled all the salespeople, like he was the manager.

Q. Was he an officer of the company?

A. I don't know. I really don't know.

Q. What is your best recollection of what his title was?

A. He was in sales.

Q. And who would he have reported to?

A. Stuart Karl. Everybody reported to Stuart Karl. It doesn't matter if you're the V.P. or the janitor. You had a problem, you come to him. If you had a question, you come to him. So everything had to -- he had to know everything that went on. If there was something that went on that he didn't know, he was awfully made about it.

Q. Why don't you go back and tell us about Court Shannon?

A. Court Shannon -- very eager, very -- how to describe him? He was a hustler, another way of putting it. Like, he had a goal. He wanted to grow in the company. Very smart. Very intelligent. Very well-

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educated. A good person, you know.

Q. What was his background?

A. I don't know his background. I know one thing: he graduated from university.

Q. What city?

A. I don't know. I don't where.

Q. You said from a university, some school?

A. Yeah, from some university. I know he had a pretty good degree, you know, pretty well-educated.

Q. And he came in relatively at the beginning?

A. Yeah.

Q. And you described him as one of the initial directors; is that right?

A. Well, not in the beginning.

Q. But --

A. Eventually he became -- you know, as far as I could recall, they always would have three of them would hold meetings together and everything. Now, to be honest with you, I've never heard them to say he's a director. Okay? I am just --

Q. Inferring?

A. -- inferring that he could have been one.

Q. Well, what was his title?

A. In the beginning, his title was in the public relations, P.R. Then his title grew into other

things that I -- sales, marketing. He was mainly in the marketing and -- you know, concentrated in marketing, promotion, promoting a product. That's where his strength was at that time.

Q. What about George Unwin?

A. All George Unwin was was a friend. As far as I know, as far as I can recall, George did in the beginning -- was involved with Stuart on the side, did shows for him, like, you know -- but they're very, very close friends.

Q. Is it your impression that he was not an employee of the company?

A. He was never there, if he was an employee. Now, if he was, I had no recall of it. I mean, you know, it never was said that -- I never knew that he was an employee of the company. In the beginning, he was, partially, you know, like part-time, like free-lancing. Okay. That's the word I'm looking for, free-lancing. But they're very close friends, so if Stuart put him on the payroll, I had no knowledge of that.

You see, the thing is that, you know, when you get to be in the circle, you know, with the people and everything, you a lot of times don't even ask questions. "Are you getting paid for what you're doing?" Of course. I mean, you know, I mean, it's questions

that you never think of. So a lot of people you meet, it's a very -- glance, short meeting. And then you see them a year later. And then you find out, "Oh, my God," you know, "You've been working here for a year and I don't even know about it," you know. So a lot of the people, you know, that I had close, I mean, relationships with, I mean, that I knew them pretty well, is the ones that I named you -- and George Unwin, also, that I knew him pretty well. E. J. Ocean, I know her well. Court Shannon, I knew him well, you know.

Q. How about Steven Bornstein?

A. I'm not that familiar with the man.

Like Gary D. Hunt, you know --

Q. I'm sorry. Is Mr. Bornstein's name familiar to you or not really?

A. You see, a lot of times the names -- I try to put the name with the face. If I see the face, I could put the name on it, you know, or vice versa. And then times go by, you forget faces, you know. And you don't use the names, so you forget the name. But eventually, if I ever see them or whatever, you know, I will remember them.

Q. How about Mr. Hunt?

A. Like Mr. Hunt. You know, I've only met him once, you know, and I didn't know what he -- it was

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such a short time. I don't remember what his position or what he had to do with it or he -- you know, what his involvement was.

Q. Did he come to the company after the Lorimar merger?

A. I can't remember at all. I mean, a lot of them -- the ones that I remember are the ones from the beginning, so it's, like, engraved in my head. And the ones that came afterwards, even if I would have met them, I wouldn't remember them, what their positions or as far as their responsibilities were.

Q. I wonder if you can give us your best recollection of the additional individuals named in the second paragraph of --

A. That's where I'm going right now. Tony J. -- Anthony J. Douglas also knew Stuart Karl ever since they were kids. He came into the company and becames involved in the public relationship -- relations, promotion, that type of item, and sales. You know, his duty was, as far as I can recall, everything as far as to do with sales.

John Lutgens is the -- is the chief operating officer at Lorimar -- used to be, or whatever, or if he's still there, I don't know.

A lot of the names are familiar, but I cannot

picture their -- you know, Kelly, Ramsey and Michael D. Ray and Robynne Phillipsen. I mean, I could have heard about these people, too, Stuart over talking.

Q. How about a Mr. Lambert? Does that name ring a bell?

A. Lambert?

Q. First name?

(After a pause) No? Not particularly?

(After a pause) Let me ask you --

A. Like, for example, I'm -- I'll give you an example here. Like, your last name is Bernstein; correct?

Q. Uh-huh.

A. And, then, there is one here -- is it pronounced the same way or is it Steven J. Bernstein, Bernstein? (pronunciation)

Q. Spelled slightly differently.

A. Well, but I'm just giving you an example. You see, a lot of names that I hear, it could -- I might say I cannot recall it, but then when you really think about it, you're going, "Well, it does sound familiar," you know.

Q. We undersand that this was quite a time ago, and we understand that you were separated from it. And all we're asking for is your best memory and that's

all you can do.

What I wanted to ask was, you had explained that Oceans, who was an employee of Karl Lorimar, had offices at Lorimar Telepictures. And please describe, to the extent of your impression at the time, what Karl's ordinary interaction with the parent company was after the merger.

A. To run the company. Are you asking me what was his position or his responsibilities?

Q. Well, please tell us what his position or responsibilities were and, in addition, what interaction, if any, on an ordinary basis he had with Lorimar Telepictures.

A. Now, "interaction"? Could you specify what --

Q. Did he meet with them? Did he report to them?

A. Oh, yes, yes. His responsibility was the company, you know, to run the company as if he would run -- as it's his own. Sure, he would have once a week in Lorimar in L.A. where Lorimar office is, studio, headquarters. And he would report to them. They would ask him. They would have conferences. Sometimes he would go twice a week down to L.A. So --

Q. Did you ever accompany him?

A. A couple of times I did accompany him, but I did not go in the board meetings. I waited downstairs.

Q. Do you know who he met with?

A. No. Well, once he met with the president of the company. I can't think of his name. Merv? His first name, I believe it was Merv. I can't recall his last name.

Q. This is the president of Lorimar Telepictures?

A. Yeah, Lorimar. Is it Merv or --

Q. Is that the only --

A. Yeah, that's the only time. Everytime I did go with him, I didn't -- either I waited in the car. There's a mobile phone in the car, so a lot of times, you know, he would get personal calls and things like that coming, telephone calls, and I would take messages, you know.

Q. You had described to us that after the merger the company grew substantially, that additional individuals came, not all of whom you saw on a regular basis, none of whom were familiar to you. And that would have been near the end of 1984; is that correct?

A. Yes, Sir.

Q. And after the merger, did your duties re-

main substantially the same?

A. After the merger, you know, the thing is that I was getting tired personally running around the way I did, you know, handling his personal life. I wanted to get out of the company. But being close to Stuart, I really couldn't walk up to him and say, "I want to get the hell out of here." So I started, like, you know, going to work late, not showing up, intentionally calling in sick, you know, everything that you could think of that a person would fire you, I was doing.

Q. You wanted to be fired?

A. I wanted to -- I wanted to make him understand what -- you know, I was on a twenty-four hour call. You know, I lived on a bloody pager. You know, everytime the pager would beep, I would jump. I'm married. My marriage is on the line. I'm going to lose my wife, so it's a decision to make between losing a wife and losing a boss; I prefer the boss, losing the boss.

So it's -- it came -- it's very hard to describe to you the life that I lived because it's a very, very hard life living with the man, being on a twenty-four hour call, you know.

Q. He was very demanding?

A. Very demanding.

Q. Was he very intense?

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A. Intense, demanding, very cocky, a man that -- to describe it better, if you had a golden spoon in your mouth and I put pulled it out and put silver in it, you're going to get awfully pissed at me. You know, so a kid that stubborn, you know, wanted his way, that's how he was, a spoiled little child.

Q. Were you intimidated by him?

A. Not at all, no. But I was tired by him. I was never intimidated. I mean, to this day, I admire the man. I have nothing against the man. No grouches or no prejudice or anything like that. But the man was tiring. The man had no feelings of what you felt or how you felt. You worked hard and hard, and as hard as you worked, more was demanded from you.

And taking care of somebody's, you know, personal life, you know, mistresses and all that, on and on, it's like being Dr. Jeckyll and Hyde, you know.

Q. So you would just describe that you started calling in sick and coming in late, and then what happened?

A. Well, one day, you know, I was just -- I had a talk with my wife and she was crying. She said, you know -- it really hit me then what's happening here.

See, Stuart had us in his hand. When I got married, he was at my wedding and everything; okay?

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And I needed -- I bought a home with his help because he gave me the job and everything. Now, prior to buying the home, I wasn't pressured. But when I bought the home myself, he always slapped that against your face. "If it wasn't for me, you would not own a home." You know, "If I didn't do this for you -- you need this job," you know. So you had no other choice. It's not like, you know, you're a man sitting there saying, "Well, I got a couple of hundred thousand dollars in the bank. I don't need you." You know, you're barely making your mortgage payment, and on top of all that supporting -- I'm supporting my mother-in-law and my father-in-law on top of all that. So it's -- so I had not choice. So I had to play his game, like it or not.

But it came to the end where I left, was that I said, "Forget it." So in order to do that, to happen, I went bankrupt. I lost my home. I lost my cars. I lost everything. But it was a choice that I had to take.

Q. And when was that?

A. In '85, 1985, when I left. And I lost -- I mean, I dragged it for about seven, eight months from there, trying to keep my home. And I kept it as long as I could, and then there was a time that I just couldn't keep it anymore. I couldn't afford it.

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Q. When did you leave Karl Lorimar?

A. As far as I could recall, I believe it was around July '85.

Q. And what was your salary? You had earlier described that originally you were compensated at the rate of $1500 a month.

A. In the beginning.

Q. And then $1700.

A. But, then, Stuart will give me out of his personal account a thousand here and a thousand there. You know, he never really -- like, sometimes I would work overtime to my -- you know, he knows that I stayed up all night to finish a project or whatever. He would give me, like, a bonus, you know, $2,000.

But, then, a lot of times he would write checks to me from his personal account to take care of his personal, you know, stuff. So it was -- you know, I was always getting mixed up. I used to say, "Wait a minute. You just gave me a check for $1,000. It's my money you gave me. Now you want me to go out and get you whatever you need?" So he would say, "I'll reimburse you." You know, so it never balanced. You know, I was always out. I was always out, out of my pocket.

Q. So the compensation, when the time came

that you were an employee of the company, the ordinary regular compensation, was that always at the level of $1700 a month?

A. Yes, Sir. When I was with Lorimar Studios, I would bill them. You see, I was still not on the company. He was a very smart man. He still didn't want to know what I -- my duties were at Karl Home Video - or, I mean, Karl Lorimar. He didn't want Lorimar to know, people to know. So he made me invoice the company --

Q. Invoice --

A. Invoice Lorimar.

Q. -- Lorimar Telepictures?

A. For -- yeah. No, Lorimar Home Video.

Q. Yeah?

A. Invoice them for consulting. And I would invoice them, like, $350 a week. I wasn't on the payroll. I did not have -- I lost all the benefits that I had before. I didn't get no insurance. I had no --

Q. That was after the merger?

A. Yeah.

Q. So after the merger, you were no longer an employee, but, in effect, an independent contractor?

A. Yeah, exactly.

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Q. Okay.

A. So Lorimar would say, "Why do you need somebody to take care -- what are you hiding?" You see, so this way there is no questions.

Q. And the invoices were for --

A. All it said is consulting.

Q. But the level of compensation stayed the same, at least the regular --

A. No. That became, you know -- for a while there it becamse -- you see, with Stuart, you know, he would spend $10,000 in one day, you know, like the flights and personal flights. I mean, it was a lot. You're talking about $90,000 to $100,000 flights. So money was not the object with him. He was a very heavy spender. I think he was a more or less compulsive spender than anything else.

Q. Let me try to understand what your compensation was.

A. My compensation, it would have been maybe $500 additional now and then. Now, when I say "now and then," meaning that, you know, it was more like expense pay. It wasn't a compensation.

Q. Just backtracking for a moment, what I thought you were saying is that your ordinary compensation, you regularly paid compensation, was at the level

of first $1500 a month and then $1700 a month. And my question was, after you commenced the new system, after the merger, where you invoiced Karl Lorimar Home Video every week, the level of compensation stayed the same as previously; is that right?

A. Yes. Now I understand. Yes, it stayed the same.

Q. And, in addition, you were trying to describe that there were periodic payments that Karl made to you from his personal account?

A. Yes, Sir, payments that -- which was expense payments or for personal use for him.

Q. And occasionally monies that were just for you?

A. I had to give him receipts. Money that I spent out of my pocket, out of that $1700 that he gave me, you know, that was expense that I paid. Now and then, he would give me a bonus just to keep me happy. But then, once every six months getting a bonus for the hours and effort putting into it, it wasn't worth it.

Then when I -- Then the day that I decided, I went up to Stuart and I said, "It's better for me to leave." You know, and says, "Well, I think it's better for you to leave." And the close relationship that we had -- and he was burnt out, too. I put my beeper in

front of him. I put the car keys in front of him, which -- you know, I was driving -- he had, you know, like Porsches and a Jaguar and, you know, brand new cars.

Q. Were these cars that were at your disposal?

A. Any of them were at my disposal. Even though they were his cars, it was under my disposal. I could drive whichever one I wanted to.

Q. Where were they kept?

A. At his home. The Porsche was kept at Karl Home Video -- I mean, Karl Lorimar, in the warehouse. Now and then it would be -- I used to use the Porsche. I used to use the Jaguar. He has a Ferrari -- now and then, you know, that was being used.

So the life that I lead was to somebody would have been a fantasy land, because, you know, I lived on airplanes, private jets, you know. And he had a two million dollar home. I would take care of it when he's out of town or whatever.

Q. But this wasn't -- if you would describe this as a sort of perk of your employment, this wasn't formalized in any way?

A. Yeah. That was my job, you know, to take care of him. You see, as far as my title, if you're asking me what your job was, Abraham, my job was to take of the man, you know. That's all I know, and that's

all I did, was take care of him. And anything else, like this situation that happened, this happened before, like, for example -- and I will get to it, but the donation to Gary Hart. You know, I remember, we were sitting in the office. He says, "Look" -- you know, as far as I can reacll, he said, "Look," he said, "I need your help." The way he put it was, like, we were going around in a circle; right? And he said -- and, you know, you felt like asking him, "Well, why don't you give it?" Well, he's up to his limit. You know, he needs the help. He needs the people to get involved.

The way we fell into it, we couldn't even ask him the question, "Is this legal or illegal" because we -- I, myself, did not know what the law is. So I said to -- well, he knew eventually by looking at me when he said, "I need $1,000 from you." He knew I don't have $1,000 in the bank, and he knew what was going to be next question is, "I don't have the thousand dollars." And he said, "Oh, don't worry." He says, "I'm going to reimburse you."

Well, in the position that you're in now, he's your boss, and you don't really want to get him angry. And knowing the way -- the type of man he is, you kind of felt like you owe it to him and you got nothing to lose. You know, he's going to give you the thou-

sand dollars, and it's like it never happened.

Q. Well, we'll get into that in a little more detail later.

You were describing that -- I believe the way we got off on this was you said you laid the Porsche keys on the table.

A. Yeah. Well, I laid the car keys on the table --

Q. And the beeper.

A. And the beeper. But at the time that -- another thing I recall is, well, he had a rental car that I was using. I used it for about maybe two weeks and then I had to turn that in. But I had no vehicle, you know. But I left -- the day that I quit, I brought the vehicle and everything, the key, the beeper and everything, and took a bus home, you know. He didn't even have the decency to say, "Can we give you a lift home?" But, no, I took the bus home.

Q. And that was in July 1985?

A. Yeah, approximately at that time.

Q. And what association with Karl or any of the individuals associated with Karl did you have after that?

A. After that, I used to call and say hello. You know, I used to miss them and used to talk to them.

But it was different. The tables were turned now. It wasn't, like, you are my boss. See, then I could tell him what I felt about him after I quit, you know. Honestly, I could say, "Look, you just burned my ass up," just like that, and I needed to break away from it. That's why I quit.

I mean, you know, "I don't know what you said to the people, you fired me or whatever it is, is besides the point," you know. "But that's the reason," I said, "Stuart, that I left." A lot of people were shocked, you know, and a lot of people didn't even know what the hell I was doing, so they didn't even miss me. Most of the time I was out of the office anyway, you know, doing his errands.

I left. I kept in touch. And the last time that I spoke to Stuart, it was last year at Christmastime. His office. I would pass by, and I wanted to see him and say hello to him, and dropped a bottle of gin, wished him Merry Christmas, and we chatted for about five minutes, looked at the new office and just goodbye, you know, walked out. And that was it. No heavy conversation, no anything like that exchanged. Just how're you doing, how do you feel.

Q. What sort of activities of his would you have been privy to after you left?

A. After I left?

Q. Would you have heard about or talked about with people, anything?

A. None. The only reason all this came about is that -- I don't usually go around talking behind people unless I feel that -- I felt like a nightmare opening up again, and I didn't want to go through what I went through before. You know, all this is, you know, coming forward, was that I received a phone call from the agency, newspaper agency, and the Register. And they said, "Well, your name is on the list. You're going to be arrested. You're going to be questioned." And I said, "Wait a minute. What are you talking about?" They said, "Well, Rama White" -- which I had seen Rama White on television, and I said -- you know, me being next on the line closest to him, you know, I still hadn't known what I violated, if I had violated any law.

So the newspaperman, when he started talking, I said, "Okay, I'll tell you my end of the story. If it eventually gets changed into a story, then let it be." But I said, "I'm going to tell you what I know." And a lot of it he changed, like ex-aide, da-da-da (phonetic), on and on to -- I mean, I never said that. And a lot of articles in there that they took somebody else's comment and edited it on to mine and it looks like I've

said it, you know.

Q. Well, as we get into more detail on the activities, I hope that we'll be able to clarify what your best recollection of all the activities were and what people said.

A. Yeah.

Q. I'd like to now get into, you know, the meat of it more, the political activities. And please start by telling us your best recollection of how and in what form Stuart Karl and the company or whoever first got involved in the political campaign activities?

A. I don't know. As far as I can recall, I don't know how it all began, how I got involved in it, you know. Politically, I was never into any -- you know, I wasn't even registered to vote, never got around to voting. So I don't know how I got involved into it.

Stuart never was politically involved, also. Now, Gary Hart being a democrat -- Stuart was a republican and changed into a democrat, you know. And the first time I was at Stuart's house when Gary Hart had -- you know, they were doing a fund-raising or Gary Hart was making a speech, something like that, at Stuart's house. He invited -- to get to know the people around Newport Beach, he invited a lot of executives. And --

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Q. When was that?

A. I can't recall. We're talking about '84, in the year. I can't recall the month or anything like that.

Q. Would it have been early in 1984?

A. Yeah, in the beginnings when Hart started his campaign in California.

Q. Do you know how Karl first became acquainted with Hart?

A. No.

Q. And --

A. I think he got acquainted maybe through Doug Rosen.

Q. Well, tell us about how their relationship arose.

A. Dough Rosen's and Stuart Karl?

Q. Yes.

A. I think maybe -- you see, the thing is that I had no knowledge of politics, so I got educated into the politics. Stuart Karl did not have any knowledge of politics. He got educated into the politics.

Doug Rosen -- you see, Doug comes from a very wealthy family, as far as I can recall. And Stuart, being himself pretty wealthy, he talked pretty big. So Doug said, well, here's a guy, has the money or knows

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the people and everything. And I guess Doug at that time, as far as I can recall, was involved with the Hart campaign, financial -- or was getting involved with it, something like that.

They became friends. I mean, you know, they started communicating with each other and talking about projects. You know, future --

Q. When was that ?

A. Nothing specific. I mean, just dreams.

Q. When was that?

A. We're looking at in the beginning, again, when -- before -- I believe it was before Hart -- Stuart Karl got involved with Hart.

Q. Would it have been before 1984?

A. Yeah.

Q. Sometime?

A. Sometime around that time. I went and picked Rosen up from Venice, from his house in Venice.

Q. What was Rosen's business; do you know?

A. No, Sir. The man was involved in everything. I don't know. I know he opened up a video place and production, that he sold it.

Q. What was the name of that; do you know?

A. Vidcom? No, I can't recall the name. I can't recall it. I went there twice, as far as I could

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remember.

Q. Do you remember if it was something like Visual Eyes?

A. Yeah, with a "V". Visions, something like that. I went there twice, and that was about it.

Now, as far as Stuart Karl being with Doug Rosen, the closeness, Doug stayed at Stuart Karl's home many times. They traveled a lot. If we were traveling someplace for location, Doug always piggy-backed with us. I believe that was around the political time, you know, that Hart was running.

As far as what I could see, being an outsider watching in, they were pretty close, you know. And Stuart was inspired by Doug and, I guess, vice versa. You know, they were both idoling each other. I don't know.

Q. Did they have business in common or just the compaign activities?

A. I think they had money in common. I mean, you know --

Q. Projects? You mean joint projects?

A. Joint projects or ventures that they had planned or they were going to do. You see, Doug is a very, very sharp man, very wise. He would choose his words very wisely. You know, I mean, he's the type of

man that you can't sit in a room -- I mean, he would make you sweat versus you making him sweat. Or he would turn the words around as if you just said it, you know, very -- he would choose his words very cautiously. And a man in his position, I'm sure, the ability and the knowledge, sure, why not? I mean, I could see a defense about it.

But they were close. They would meet each other a lot. But, you see, they would never talk in front of me or anybody if they had something very confidential to talk about. I mean, they wouldn't just come out and say, "Hey, you know, what about -- let's talk about Gary Hart," you know. No. Everything was confidential.

Q. You said Rosen stayed at Stuart Karl's home periodically?

A. Yes.

Q. Did he visit Karl Home Video?

A. The time that he stayed was at Karl-Lorimar. It wasn't Karl Home Video.

Q. No, not at his home. I mean, did he visit the company's --

A. Oh, the company? Visit at the company?

Q. Yes.

A. As far as I can recall, I think he did

a couple of times, stop at the company. If he visited there when I wasn't there, that's another question. But as far as I can remember, I seen him there a couple of times.

Q. During 1984, prior to 1984, when?

A. During '84, during the campaign, I believe. I can't recall that exactly.

Q. In the instances where you were present, did they talk about campaign activities at all?

A. They would take about the campaign, where Hart's going to be or how Hart did or this or that, but nothing as far as financial, how they're going to do the campaign fundraising or -- I'm sure -- you know, I mean, Doug sometimes would tell Stuart things, but, you know -- and then, being around them all the time, you pick up little things, gestures, or you pick up movements or expressions that they do that would automatically empty the room. So you kind of pick that up, why people are leaving the room and they want to stay there alone. Or meeting places, like, in L.A., designated areas that -- confidential, you know, meeting in Jackson Hole, Wyoming or meeting in Palm Springs or wherever the designation is. A lot of times we didn't know. They could have -- as far as I know, they could be meeting in a corner of the freeway somewhere.

Q. But you think they made arrangements to meet in some far-away place?

A. Doug -- Anyway, Stuart was a lot of times -- far places. Doug happened to show up or came with us. So I know they didn't talk -- I mean, you know, you could only talk so much about a subject and then you get tired of talking about it. So I don't know what the topic was or on the agenda, on top of the agenda was, but they would talk about a lot of things.

I, a lot of times, you know, would walk way, you know, because I didn't want to sit there and hear it -- you know, not because it was -- you know, I was -- not because I knew they were doing something wrong or anything like that. But I just didn't want -- I didn't want him to ask me, "Well, what do you think of this? What do you think of that," because it was too much.

Q. But I think you said that it was Rosen who got Stuart Karl involved in political activities; is that right? Campaign-related?

A. As far as I can recall. And when he showed up in the picture, Stuart got more and more involved in the politics. He wasn't -- You see, what I'm trying to say is it wasn't just out of the sky Stuart said, "Oh, I think I'm going to go vote for that guy," you

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know, "I'm going to become a Democrat right now and go vote for that guy." You know, somebody -- somebody gave him the direction, you know, and somebody pointed him the way -- why or this, now, I can't -- all I could do is assume, like, you would see him as of now. But at this time, they would talk a lot over the phone, you know.

And sure, he was -- I mean, I was at the campaign in San Francisco in '84, the last campaign that he had in San Francisco, Hart. I can't remember the exact --

Q. I'm sorry. When you say "the campaign in San Francisco," what are you referring to?

A. Gary Hart campaign, presidential campaign. That's what I'm referring to.

Q. Do you mean an office of his campaign or --

A. No, no, no. On-the-road campaign. What do you call that?

Q. Do you mean an appearance, a fundraiser?

A. Yeah. No, public -- the center of San Francisco, the --

Q. Are you referring to the convention, the Democratic convention?

A. The national convention. Campaign, I call

it. Convention.

See, we went down to the convention where Doug Rosen was there also. Stuart was there.

Q. Well, backing up a little bit from the convention, which was in July of '84, I think you had described that Karl had a fund-raiser for Gary Hart at his home?

A. Yes, Sir.

Q. And you think that was at the insistence of Doug Rosen, or you infer that it was?

A. All I can say to you is, you know, him being so -- Ever since I remember, Doug wasn't showing up in the pictures, Stuart started getting involved in the politics.

Now, it could have been inspired by Doug Rosen, and Stuart could have said, "Hey, I could raise money, too." Do you understand? See, Stuart a lot of times had one fault. He liked -- He loved to show off. "I got it, and you ain't got it" type of a thing. And that bothered a lot of people, but they didn't -- you know, after a while, once they got to know him, they said, "Ah, that's Stuart. That's his character."

But now when you get him on politics like this, you turn around to a Hart or any of the campaigns and say, "Oh, don't worry, I'm going to raise you ten

million dollars," for example, well, then, you know they are going to pound your head and if you don't -- you know, because you just made a commitment to those people. And when Stuart made commitments, he -- sometimes he hated it, but he had to go through with it, especially making a big commitment like that.

Q. So do you think he might have made a -- that he made a commitment to the Hart campaign to raise a certain amount of money?

A. I think he did. I mean, I feel like he did because when the time that -- after a while, then, he started getting burned out on it, as far as I can recall. You know, he was getting tired of it, you know. In the beginning it was fun, and all he saw -- quote and unquote, all he saw was lights, spotlights on him, you know, and fame. And I don't know what they would have brought him if Hart would have become president, but, you know, his dreams were something about -- he kept talking about being an ambassador, a promised ambassador. First we thought he was kidding, but then we looked at him and he was serious, being an ambassador. So greed --

Q. What I'm trying to get back to is actually the -- Was there something that motivated him to carry out the --

A. Yeah. Doug Rosen -- you know, he was the only one that I know -- I could recollect -- that was a guider to him. Now, other people that you interviewed, that they have noticed things that I overlooked. You know, you'll find it could have been other people, too, in the Hart campaign.

Q. Well, let me ask that question directly. What I want to do is actually go back to the very beginning, but let me ask a broad question. Were there other individuals associated with the Hart campaign that you or Stuart Karl or other people with Karl had contact with in the course of these activities?

A. Such as the employees, you're talking about? Activities such -- I still don't --

Q. Any and all of the political activities.

A. Well, all the people you got here, named here.

Q. I'm sorry. Maybe I didn't make my question to the point. Let me try again.

What I thought you had just said was that it was your understanding that Rosen was associated with the Hart campaign and that Rosen was the prime motivator of Stuart Karl and his -- and Stuart Karl's activities.

A. As far as I can recollect, yes.

Q. Right. And my question is, is there anyone

else associated with the Hart campaign --

A. That Stuart was --

Q. Yes.

A. -- motivated? No, not that I can recall.

Okay. All I see, all I could remember and see is Doug Rosen, main man. Okay. Now, if there was others, I wasn't aware of. You know, I wasn't aware of because I was never introduced to.

Q. Do you know what Rosen's function was within the campaign, or his title?

A. I believe he was a financial fundraiser or that type of -- he had that type of a -- he would raise money for the campaign. So as far as -- I was under the understanding that Rosen was with the campaign and coming from a wealthy family. So you didn't really ask questions. You know, you respected that. You know, you didn't want to pry, "What do you do for a living?" You know, that's the last thing I want to ask somebody in that caliber, you know, "What do you do for a living?"

Q. You learn not to ask a lot of questions?

A. Exactly. You ask no questions, nothing happens. You ask questions, a lot happens, you know.

Q. Okay. So we had Mr. Rosen. And now let's please go back to, as best as you can remember in sort of a time frame in which they happened, the activities.

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And you can start it with a fundraiser that you thought was held at Stuart Karl's home for Gary Hart. And what's your best recollection about when that took place?

A. Again, this -- we're talking about the beginning of Hart's campaign. You know, I can't remember date or month. But it was at Stuart Karl's home, and Hart came over and gave a little speech and talked about what he's going to do, you know, your typical speech. And after that, he sat down and Stuart introduced him to certain people, I guess key people that will be an asset to Hart. And I stayed there for about another twenty-five minutes, and I left.

Q. Who else attended?

A. Everybody. I mean, it was a lot of people that attended. I can't -- you know, most of the --

Q. This is long before Lorimar. This is Karl Home Video?

A. Karl Home Video.

Q. So did all of the employees of the company attend? Did --

A. Yes. Employees were requested to attend. I mean, you had no choice. Show up, because he needed bodies there, people.

Q. Was the request made in writing or just orally?

A. Orally. Well, with Stuart, if you ask for writing, you better walk home, you know. He never gave anything in writing, not to his employees he didn't. I wanted a lot of things in writing and never got it.

He said, "I want you to be there at this time. Don't let me down."

Q. So Karl came to you and told you that?

A. Yes, Sir. And when he said, "Don't let me down," you know, you know that if you do let him down, next time around you have a problem.

Q. So how many people are we talking about at this --

A. Maybe, like, thirty people, thirty, forty people.

Q. And were these all Karl Home Video people or were there other --

A. No, most of them -- most of them were your key figure people, money people. But I didn't see -- I didn't know who was who. All I know is he needed more bodies, and a lot of the employees showed up and drank and ate and went home.

Q. Now, when you said "key figure or money people," do you mean people other than Karl Home Video people?

A. Yes, Sir. Other people that were wealthy

people that he wanted to -- those people to get familiarized with Hart, you know, so they could be supporters of Hart financially. If he ever needs money, he can come back to them and say, "Look, you met the guy. Why don't you give some money," you know.

Q. What were their names?

A. I don't remember their names.

Q. So were contributions given to the campaign in connection with this affair?

A. Not that I know of.

Q. Let me ask you first, what time of day did this take place?

A. In the afternoon, late afternoon.

Q. So -- I'm sorry. At this time, Karl Home Video was in Costa Mesa. It had not moved to Irvine yet; is that right?

A. As far as I can recall, yes.

Q. And where did Stuart Karl live then?

A. He lived on -- I believe it was called Marypata in Newport Beach.

Q. So is that --

A. Marypata, the name of the street, like Marypata. That was in Newport Beach, the first house that he had before he went to Big Canyon in Irvine, I believe, or Newport Beach again. That's where he resides

now and that's where he lives.

Q. So, is Costa Mesa close to Newport Beach?

A. Oh, yeah. It's a block away. It depends which part of Costa Mesa -- if closer to the ocean, you border with Newport Beach. Further away, you -- Costa Mesa is not that big of a city. It's a small city.

Q. And so at some point in the afternoon, all of the employees trooped over to --

A. A lot of the employees lived in -- I mean, I lived in Newport at that time. You know, I mean, I lived twenty minutes from his home.

Q. Was this -- What I'm trying to get to is, would this have been after working hours or during working hours or --

A. We left early. I can't remember if it was working or what. But I know one thing. We left early. I got home, and I changed, and I said, "I got to go." I can't -- see, I want to say Saturday, but then I was always Saturdays at work, too, so I can't, you know, really pinpoint what day it was. But I keep wanting to say Saturday afternoon.

Q. But you're not aware -- are you aware of contributions that were requested or raised in connection with that --

A. No. I was -- If there were, I wasn't aware

of it.

Q. Was there a time when you were requested to make a contribution to Gary Hart?

A. Yes, Sir.

Q. When was that?

A. January -- I believe either January, February or March, around that time. I can't recall the exact date.

Q. In 19 --

A. '83.

Q. '83 or '84?

A. '84. I'm sorry.

Q. '84?

A. '84, around that time.

Q. Well, approximately how long after the meeting that you just described --

A. I can't -- If you're trying to --

Q. Associate the two?

A. Yeah. I can't pinpoint or say how close of time it was because there's other compaigns, other fundraisings happened in between, too, that confuses me, because there was a fundraising in Newport Beach in Irvine, I believe, around there. There was a restaurant that we did a fundraising there for Gary Hart, and there was another big executive in Corona Del Mar, Cal-

ifornia that had it at his home.

Q. What was his name?

A. That's the thing. I can't remember the name.

Q. What was the name of the restaurant?

A. It's not a restaurant. It was his home.

Q. No, the earlier one you described.

A. I can't recall the name. I know it's a restaurant. We went there -- I mean, I could drive you there.

Q. Were these activities -- How did you come to know about these activities?

A. Stuart made sure that we were there.

Q. Oh, all of these additional fundraisers or meetings, whatever they were, were ones that all of the employees attended at the request of Karl?

A. Exactly. You know, wherever the campaign was and he needed bodies, you had to be there. You had no choice. You couldn't say, "I have to go home. I have a date or I've made a promise." Uh-uh. You show up or you don't show up at all.

Q. Do you remember if these were, again, during working hours?

A. Yes, some of them were in working hours. You see, with us, you know, we had no schedule set, so

we could leave anytime and come in at any time.

Q. Were there times when work stopped because the Karl Home Video employees were off to one of these events?

A. Oh, yeah. Well, most of the people were out -- I mean, you know, the secretaries and the crew is out over there at campaign, fundraising, sure. You know, the office would close early if it was office hours. You betcha. A lot of times they would bring secretaries as temporary help and put to answer the phones, so we could call in and find if there's any messages for us, or he would hae an answering company answer the telephone.

Q. So you had described, in addition to the first event at Stuart Karl's home, another event at a restaurant and a third event at -- in Corona Del Mar at a personal home?

A. Yes, Sir.

Q. What other events can you remember? Were these both in connection with Gary Hart's campaign?

A. Yes, Sir.

Q. These other events?

A. All of them, he showed up. Gary Hart was there.

Q. What other such events can you remember?

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A. As far as I can recall, those are the ones that I can remember, that I physically was there. If any other ones happened, at this moment I cannot recall it. I don't remember it.

You see, a lot of things that I want you to know is -- when I left there, I blocked that in my head.

Q. Say that again.

A. When I left the company, I was so burned out that I wanted to forget a lot of things that I didn't even pay attention or thought about it. And the only way I could remember things is if I would think about it all the time in my mind. So a lot of stuff I've forgotten, you know. Or if -- as it goes along and I see faces and things like that, I remember it. It'll come back to me. But it's just -- to sit down and really pour it out, you know -- the same thing with the FBI and everybody else that questioned me, you know. The questions you're asking me, I respect that. But a lot of them I don't even remember them.

You know, I was only there until '85. A lot of it started and really get in deep after '85.

Q. Obviously, we're asking for no more than your recollection.

A. Yeah.

Q. And the only thing that would be helpful is if you think there might be something that could help refresh your recollection, if you tell us.

MR. BERNSTEIN: Celia, did you have a question that you wanted to ask?

MS. JACOBY: Yes.

EXAMINATION

BY MS. JACOBY:

Q. There was a point where you said Karl pretty much said come or don't come. What really do you mean by that? When you said, "Show up at the meeting or not show up."

A. Okay. Stuart Karl -- yeah. If you don't show up at a meeting, either you're fired -- putting it bluntly, either you're fired, or when you were going to a project or whatever the next day, you were treated rotten for a week, as if I would tell you, like a little kid, "Stay in the corner," and then move out of the corner.

Q. So employees interpreted this phrase as a threat?

A. It is a -- yes, it was a threat. It wasn't a gesture of friendship because he -- a lot of times, honestly, I couldn't have gone. I had to take the wife out to dinner or be with the family. I missed it. And

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the certain days this would happen, you know, you're about to say no and you're saying, look, well, what about my family? And he says, "Well, you really need your job to take care of your family, don't you?" So that automatically answered the question there. You were threatened. You were afraid.

And entertainment is a type of a occupation, you can't just quit and go get another job. It's a very hard field. That's why I'm not -- you know, I'm still trying to get back into it, and I haven't been that successful the past -- you know, ever since I left there.

To answer your question shortly, yes, threatened.

FURTHER EXAMINATION

BY MR. BERNSTEIN:

Q. Was it your impression that there were other events that took place that you didn't attend?

A. I'm sure it did, yes, but I -- is it the time that I was there or after I --

Q. The time that you were there.

A. Oh, I --

Q. Did you attend all the events that took place?

A. No, not all of them. There was some that

I did not attend. I don't remember when or where, but there were other ones that I didn't attend.

Q. And these were other events that --

A. Fundraising.

Q. -- that other Karl Home Video employees did attend?

A. Yes. I believe they did. I know a couple of them probably would have been there for sure, would be Court Shannon, and if not Court Shannon, Pierre Loubet will be there. They were roommates. Sometimes they'd alternate who goes and who doesn't, you know. Sure, some of the employees would have been there. Stuart would always want his employees to be there, always. He insisted upon an employee to be there.

Q. Just to have bodies?

A. Just to have bodies, or if he needed some, he would ask the employees to do it -- you know, not him. You know, he needed a "go-fer" more than anything else a lot of times.

Q. Give us your best estimate, please, of the number of such events that there were. You've described to us three.

A. I recall three, but I cannot -- you know, I'm sure there were more other ones. But I cannot remember how many or give you a figure, number. I could give

you a hypothetical number, but it's as good as me trying to say --

Q. I understand.

You were starting to describe -- and let's get back to it -- the time when Stuart Karl came to you and asked you to make a contribution to Gary Hart.

A. Uh-huh.

Q. And I think I had asked you when you thought that was, and you answered that it was in early 1984 sometime; is that right?

A. Around that time, yes. The beginning of the campaign or in middle of -- not middle, but it was quarter way of the campaign, I believe, as far as I could recall.

Q. And tell us what took place, the interaction that you had with Stuart Karl about it. This is what you had gotten into earlier, and I wonder if you could --

A. Yeah. Well, Stuart Karl, you know, sat there and said, "Look," you know, he says -- I don't know how the conversation really started. I can't remember how it all boiled into that. I can remember that, you know, "Come on, you know, look, I've raised so much money and now I need more help." The way he's bringing that, he's looking at you, but it's not really at that

moment -- you know, then he's saying, "Oh, okay, look, why don't you give me a thousand dollars? I need a thousand dollar check from you," you know, a contribution to Gary Hart. I'd say, "Well, sure, all that sounds good, but" -- just as I was about to say, "I don't have the money to cover that," he said, "Don't worry, I'm willing to reimburse you the money." So that assured me right there -- comforted me that I'm not going to have a bounced check or, you know, I'm not going to miss a payment on something else because I just contributed a thousand dollars that I can't afford to Gary Hart.

So I felt, you know, okay. But you didn't question. You see, the way things happened --

Q. Oh, I understand.

A. Yeah.

Q. I understand. Please go on. So then what happened?

A. So I gave him a thousand dollar check and had written a check out of my wife's -- I had my wife write a check, but she wasn't aware of what was going on. All I did to it -- "Give me a thousand dollars that we're going to contribute to Gary Hart, and I'll put it out of my personal account in your account." So she thought that I was putting money in her account. You know, she didn't question me, "Where is the money coming

from?"

Q. I'm sorry. Can you explain that again?

A. I approached my wife, and I said, "Stuart Karl says I want -- you know, we have to contribute a thousand dollars; okay?" But I've already contributed the thousand dollars. So two thousand --

Q. Well, I think we hadn't gotten that far yet.

A. Okay.

Q. You had said that you had the conversation with Stuart Karl where he had asked you and promised you he would reimburse you. Then what happened? Did you indeed write a check?

A. Yes, I wrote a check.

Q. And what happened to that check? Did you hand it someone?

A. Ihanded it to him.

Q. Oh, on the spot?

A. Yes, Sir.

Q. I see.

A. I handed it to him. He picked it up. He turned around in his desk and put it on his wall desk.

Q. And was that in connection with any fund-raising event that took place?

A. No, not that I can recall. You know,

again, if he would have promised some or if he had a deadline -- I felt like he had a deadline to come up with so-much amount of money, but that's my personal feeling. You know, I can't pinpoint it down, but that's my personal feeling because he was rushing it.

Then he said, "Well, how about your wife? Tell her to write a thousand dollars."

Q. Did he ask you that at the same time?

A. Yes, Sir. And I say -- then he says, "Don't worry, you'll be reimbursed." Well, now he's telling me that he's trying to raise the money. So he didn't care how he raised the money, you know.

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Q. So then what happened? You went to your wife, as you were starting to describe.

A. Yes. I went to my wife, and I said, "Honey," I said, "I need a thousand dollar check from you, and I'll write you a check for a thousand dollars or I'll put it in your account." I don't remember how I described it to her.

Q. Did she have a separate account?

A. Yes, a separate bank.

Q. What was her name? What is her name?

A. Patricia, P-a-t-r-i-c-i-a.

Q. And does she use your last name, Patricia Kantzabedian?

A. No. She is Patricia Bonham. You have a Bonham here, but that's not her.

Q. Can you spell her last name?

A. B-o-n-h-a-m. It's the same spelling. But there is also a Bonham in Karl-Lorimar.

Q. Okay. And your wife wrote a check on her separate checking account?

A. Yes, Sir.

Q. Okay. And you gave that check to Stuart Karl?

A. Yes, Sir, I sure did.

Q. And then what happened?

A. And then Rama White, I believe -- I can't recall exactly, again, how long it took, but Rama White brought me an envelope with cash money in it to cover both checks.

Q. For -- how much?

A. Two thousand dollars.

Q. And what's your best estimate of how long after you handed these checks to Karl this --

A. It was a day to two days, something like that, because I know he held on to the checks. One of the checks that I gave to him, I believe it was blank, the date was blank. So, you know, when he gave the check in as a donation or whatever, you know -- but the money,

I believe, you know -- again, I used to get so much money from him on other stuff that I can't really -- it had -- it couldn't have been more than a week or so because the money is not in the bank. So if he gave the check to them, he had to make sure that everybody got their money so the checks won't bounce.

Q. So Rama Whit e brought you an envelope with two thousand dollars in cash?

A. Yes, Sir.

Q. And did she tell you -- or how did you understand that this was the reimbursement for the contribution?

A. Well, when you're getting an check for -- when you're getting an envelope with two thousand dollars in it and you just wrote a check for two thousand dollars, and totaling together, I knew what it was for.

Q. Did she say to you, "Here's the reimbursement," or in what -- what conversation did you have with her about it?

A. I can't recollect that. All I can remember is that I knew it was the money for the campaign. That's all it was for. I was -- other money that I get from him, usually the envelopes -- you see, Stuart, when he gives me an envelope with cash in it, there will always be a note in there if it's personal. This one did not

have a note or anything like that. All it was was a clean envelope handed to me, blank, you know. So my assumption was that it's for the two thousand dollars that was written. It's got to be deposited. So the next day, the following day, I deposited the money.

Q. Where did the money come from, the cash that Rama White gave you?

A. Personal account. As far as I can recall, it came out of Stuart's personal account.

Q. How did you know that?

A. Because it was -- anytime Stuart paid some people cash, it all came out of his personal account.

Q. Why was that?

A. Because then he had nobody to explain to where the money's going. I'm sure it wasn't a company check. You know, Blackburn would have asked, or whoever it was at that time -- I can't recall -- would ask him, "What is this money for," so we got to write it in our books, you know. If it was the company money, then he must have used it for some other explanation, entertainment or something like that.

Q. So you inferred, because all of the cash payments he made for a lot of different things came from his personal account, that this did as well?

A. Yes, Sir.

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Q. What other sorts of things did he make cash payments for?

A. Whatever it is, a rented car for a girlfriend, to take care of his mistresses -- he's not about to write me a check for his mistress, you know. No loose ends.

Q. Did you have conversations with other employees about the making of contributions and reimbursement that you've just described?

A. No. It was confidential. We never really -- I mean, it wasn't like said on a confidential basis. Obviously, whoever was at the fundraising, you know, gave money to Gary Hart. So they all knew -- everybody knew that everybody would give money. And everybody knew that everybody received money because, you know, it's a lot of money that was given. And Rama passed the cash along to everybody else, not only me. I didn't see her physically giving it to everybody other than seeing her physically give it to me.

Q. How do you know she gave it to others?

A. How do I know? I'll tell you one thing. At that time, what the girls made, the secretaries made, and to give $500 contribution to Hart campaign that these girls weren't even involved in any campaign at all or any politics, that's a lot of -- chunk. When a girl

has a rent to pay, $750 a month, and has car payments to do on top of all that, she cannot afford to give $500.

Q. How did you know they made contributions at all?

A. How?

Q. Yes.

A. Well, my assumption was that when they showed up when Stuart Karl was talking to me as far as raising the funds, the money, the feeling to me was that he already approached others, too. That's the feeling that I got, the at-ease that he gave me, like, "Don't worry about it, you know. Everybody else gave the money." That's the feeling that -- the comfort that I got -- well, if everybody else done it, then if I don't do it, I'm going to be out. You see, that's -- when he spoke to you, he didn't have to tell you. He made it -- the way the conversation came, that he made it sound like, "Look, everybody else done it, you know. Come on. Don't be a prude, you know, you do it, too." I figured that if everybody jumped in and done it, that it was my feeling at that moment when I was sitting with him, that their jobs are in jeopardize (sic). You know, I mean, this not a joke. This is reality here. And I wasn't about to challenge him on that and found out, you know, in an unemployment line. So I just grabbed

it and run with it. That's all.

Q. Did you have the impression that the contributions by other employees were made at the same time that yours were?

A. There were two other employees that -- they were -- yeah, I believe that was the same day, because he walked around the offices and joked and talked and da-da-da-da (phonetic), you know, got everybody all psyched out, and then he started calling them in or was going seeing them if they couldn't come. I think he solicited the same day and collected from some of them, whoever had a checkbook with them. And whoever --

Q. Do you know the names of those particular people?

A. No, Sir.

Q. It was more of an impression you had that he was approaching other people as well as you?

A. Yeah. Whoever had a checkbook with them wrote a check. I had mine with me at that time, so I wrote a check to him, you know. And if I didn't have it, I would bring it to him the next day, like my wife's. You know, I didn't have it then, you know, so I had to ask her and return the check to him the following day.

Q. And what proximity did this have to fund-raisers or other situations where the employees trooped

down to somebody's house or to a restaurant?

A. I'm sorry. Say that again.

Q. What I'm trying to understand now is were these contributions made in close proximity to one of the fundraising events that you described?

A. I can't recall that.

Q. Do you recall that the two subsequent events that you described after the first one that was held at Stuart Karl's house, was this after you and the other employees had already contributed or before or what?

A. I think we already had contributed on one of them, the one that we have in -- the one that we went in Laguna or Corona Del Mar or somewhere around there. We had already contributed the money because I -- and after that, I started receiving letters from Hart campaign, things -- you know, donations, you know, "Would you like to donate $100 more," this and that, you know.

Q. You got on the mailing list?

A. Yep, I sure did. Junk mail.

Q. Do you know of any documents that would have memorialized who Stuart Karl solicited for contributions from the company, who he reimbursed, that sort of thing?

A. The only person that I think you would

have success in finding that information would be when you talk to Rama White. She will be able to answer that much better than I would.

Q. Where did Stuart Karl get the idea of reimbursing the employees' contributions? Do you know where that came from?

A. I think that probably came from him. You see, again, you know, I want to say Doug Rosen, but, you know, I don't -- you know, because Stuart had reached his limits, you know, the understanding that we had. But he had a commitment to make. He had --

Q. I'm sorry. When you say "reached his limits," what do you mean?

A. Well, you could only allow to give so-much money," and if you give the money you can't give any more. So what you do then, you start -- depending on your outside sources, like as I'd come to solicit you and get it from you. But if you can't afford it, I still need your physical name. Actually, what I'm doing, I'm buying your name from you.

And that's what he did. He bought our names. But he paid for it and we paid for it, more or less. I mean, you know, exchanging it, like giving me money and I'm giving him a cashier's check, you know, charging him for a cashier's check.

But -- so when he was at his limit and back to his goal and/or whatever commitment he had made, raising the funds. So that's another alternative. I mean, he couldn't go to a stranger and said it, "I give you a thousand dollars, give me a thousand dollar check." So he had to actually approach people that he could depend on, make sure that the money wasn't spent on something else and the check bounced.

Q. Do you know -- Did you have an impression that other individuals besides employees of Karl Home Video were solicited and reimbursed?

A. As far as reimbursement, I don't know. But I know solicitation -- you know, there were doctors and lawyers and anybody getting -- came in touch with him, he solicited, you know.

Q. How do you know about that?

A. Well, because the doctors that -- a couple of doctors that I know, they were involved. I can't think of their names right now, but I believe it was Dr. Roger Guss, G-u-s-s, and Dr. Dale Unbert, U-n-b-e-r-t. I believe they would -- I mean, those guys were never involved in politics. They were friends of Stuart. They showed up.

Q. They showed up at one or more of these fundraisers?

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A. Yeah, functions. Or, you know, they would give donations or whatever, you know. So, I mean, it was -- if you knew Stuart, you would know that -- you would know his character, you know. So from a lot of things that I'm telling you, is a lot of it by me being around him and seeing what I saw.

A lot of times conversations didn't even have to exchange, you know. All you do is two faces looking at each other, and know what they were -- what to do.

Q. When I asked you where you thought Stuart Karl had gotten the idea from to reimburse, if from anywhere, you said you thought that he had thought it up. And then you said that you wanted to say Doug Rosen, but you weren't certain?

A. Well, you see, one day Stuart got a phone call, and it was a one-man conversation; okay? I'm hearing -- now, I'm telling you as if I'm watching you talk to somebody else, but I could only hear you talk; okay?

Q. I understand.

A. And Rama --

Q. When was that --

A. We're talking at '84 again, around that time.

Doug always called Stuart, you know. I

mean, so it was a habit of, you know -- So I was sitting in Stuart's office and Rama buzzed and, "Doug Rosen is on the line," you know. The speakerphone. "Hello, how are you? I got to talk to you private-like." Okay. So the phone got off speakerphone and became a hand-held phone now, and he's talking into it.

And from just listening to the partial conversation, you know, was employees taken care of, and Stuart was more like, you know, as if I'm telling you, is employees taken care of. And you're saying, "Yeah, employees are taken care of. All the money is taken care of."

Well, there was, like, a day, two days, something like that, in between that when the solicitation happened, when the checks were written and all that stuff. You know, I mean, I'm talking -- we're not talking that much of a big gap there.

So why I'm saying Doug Rosen is that I believe that he was a puppet for Rosen and Rosen was a puppet for somebody else and on and on. I mean, we couldn't go up the stairs and come to one person.

But it all -- everything started going towards that direction because, you know, the guidance -- he had a guidance from Rosen. You know, he told him what to do or how to do it, or I don't -- whichever

way, you know. But he was guided from him, you know.

Q. Let me try to pin down, if I can, the discussion that you overheard between Karl and Rosen on the telephone, only hearing Karl's end; is that right?

A. Yeah.

Q. Do I understand you to say that this took place after you, and presumably other employees, both contributed and were reimbursed, and that it was the proximity to the reimbursement that led you to infer that that's what they were talking about?

A. Yes.

Q. Is thta right?

A. Yes, Sir. Now, the way I -- and I was sitting also in the room. Before I got up and left, I said to Stuart -- you know, and waved at him. You know, I said, "I'm leaving," you know, "Do you have anything?" And he shook his head and said, "No."

But prior to that, as we was sitting down, Stuart was talking to Doug. First they said, "How are you doing" and all this, you know, your typical -- and then he said, "Yeah." He says, "Employees are taken care of." You know, I mean, "They are paid back." So --

Q. I'm sorry. Who said that?

A. Stuart.

Q. Stuart said to Rosen what?

A. Just as I said: "Employees are paid back. The cash is" -- I mean, you know, it's like, "The money is taken care of. The employees are taken" -- I can't remember exact words, but, you know.

And I was walking out when I heard that. I could only put two and two together, you know, he's probably talking about us as, you know, as we wrote the checks. There was nothing else that I could think of that that conversation will go for and to that direction.

Little things like that. I mean, you know, as far as any other stuff, I cannot pinpoint saying that Doug Rosen, you know -- even now I can't -- I don't want to point fingers and say Doug or Stuart or whatever. All that I could do is say it the way -- you know, the way things happened, you know.

Q. What discussions with Rama White did you have about that subject, the reimbursement?

A. None, as I could recall. If I did, it would have been a very short conversation. But I don't remember having a conversation with her regarding the reimbursement.

I know a lot of times I used to go to the bank and bring cash. But I can't even remember if I went and got to the bank and brought the cash. You know, I can't remember. I would have remembered it if I would

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have done it, because it's a lot of money paying back. So I don't really recall that.

Q. Do you have an impression about whether spouses of other employees were requested to contribute and perhaps reimbursed?

A. Most of them, if you check, you probably find most of them that spouses were -- did contribute money, because if I was solicited, they were, too.

Q. You infer that? You assume that you were treated like the others were?

A. Yes, Sir.

Q. Okay.

A. Because if he is, again, that desperate with me, asking to have my wife write a check, why shouldn't he ask the next guy that has a wife or a girlfriend to write a check.

Q. But you didn't have discussions with any other employees about this?

A. No, Sir. I kept everything that I talked with Stuart Karl -- always was in confidential. You know, I never discussed what Stuart told me or did or whatever with any other employees, not unless they happened to be there at the same time the conversation is happening. That's different. But me just walking out and babbling my mouth, no.

Q. If there was one employee that you either worked particularly closely with or were particularly close to, who was that?

A. Rama.

Q. Rama?

A. Rama would be the closest, you know. Everybody else -- I mean, I was close to everybody, I mean, you know, talking to them and everything. But, I mean, we -- and once the company grew big, Rama was the only closest one that I communicated with.

Q. The activity we're now discussing was really -- was before Lorimar, at least at this point?

A. Yes, Sir. Well, partially is Lorimar and partially is before Lorimar, because he was still with Hart campaign thing when he was with Lorimar.

Q. Let me ask you this. At any period that you were involved or that you know of, were contributions solicited on behalf of other federal candidates?

A. I'm not familiar with that at all. Just knowing the way we were solicited could have -- but I can't really answer that question.

Q. Can you try to describe whatever, you know, other hints that you might have had in addition to the conversation that you just told us about that you overheard that gave you the impression that Rosen and Karl

had come up with this idea together or that Rosen had given Karl the idea?

A. I cannot come up with -- I mean, I can't really say that Rosen gave -- All I can say that Rosen guided Karl, not gave the idea. They would have a lot of small talks, nothing big that I could really put anything two and two together, because they would talk about politics and they would talk about personal stuff.

Like I said, Rosen was very careful choosing the words that he spoke in front of people.

I could tell you that they've been together a lot, but as far as any conversation happening -- actual full conversation happening or something even for me to put together with Rosen being there, it will be very hard. I can't recall of any --

Q. So the strongest, really, that you can remember and the most direct that you can remember is this conversation that you overheard half of?

A. Yes, Sir, half of. A lot of times I could know when the room is going to clear out because Rosen always had his glasses hanging here. And they would have sign languages, and he would indicate his heart, meaning that we're just going to -- and the whole room, everybody'd get up and leave. You know, it's like -- because Stuart would say, "Okay, thank you very much,

guys. I'll talk to you later." And you're going, "Well, you haven't even finished your conversation."

Q. Can you make that clear. I'm not sure that we got that on the record.

Do I understand rightly that what you were doing is scratching your shirt over your heart?

A. Oh, yeah. You know, how he'd take the glass and just rub it against the heart or make a gesture about the heart.

Q. And what was your understanding that that meant?

A. Well, when I looked at it, I understand there was a -- there's a subject about Gary Hart, because only him and Stuart would be together. Or, you know, if there -- if we would be walking, all of us walking together on the street, for example, and then before you know it, Doug and Stuart Karl are either behind us, half a block down, or in front of us, half a block up. You know, they would decide confidential or -- you know, Doug would not talk. He would not jeopardize himself by talking anything that will -- as of today will get back to him.

Q. In the instances you've just described where the room would clear because Rosen and Stuart Karl were going to talk, you thought, about Hart, was there

ever any instance where there was a third individual in the room?

A. You mean, a third individual would know what I know, or --

Q. A third individual who didn't leave the room when --

A. Oh, no. No. Oh, no, no. If a third individual was there, there was an attorney or somebody with Hart campaign or somebody was involved or something like that. I mean, if an individual would stay.

Q. The names of any individuals?

A. I really don't know. As a matter of fact, I very -- the only person that I know from Hart campaign was Stuart Karl -- I mean, Doug Rosen and another gentleman that I forgot his name was, that he started to make the headquarters in Westwood area or somewhere around Los Angeles area, that I personally delivered a computer to.

Those are the only two that I -- the most that I've come in connection is, is Doug Rosen.

Q. How many meetings were there where Rosen was involved and then everybody left the room when --

A. I can't recall.

Q. -- a message was sent?

A. I wish I could recall.

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Q. Was it many or several or one or two?

A. Well, I was in one or two, as far as I could recall, but I'm sure they had a lot of meetings or a lot of times that Doug would show up in the company and spent time with Stuart, you know. But I couldn't really tell you how many, no.

Q. Would you have any estimate, in the instances where Rosen visited the company -- in effect, what was he -- my question is, what was he there for? Was he there for campaign things? Was he there for a variety of things?

A. See, with Rosen, you never knew what he was there for. He will take every little -- how can I -- I'm trying to find the word -- every little moment of time, and he could take that and make it into a profitable time for him or a pleasure time. But he wouldn't waste any time. Everything that he would talk, it's for a certain profit, because he was a very business (sic) man. I mean, to him, ten minutes is a wasted time. If there is nothing to gain from you with him and within that ten minutes, he just killed ten minutes of his life. That's how he was. So he wouldn't -- All he would discuss is -- if it's pleasure, it's still something has to do with profit in it, you know. Otherwise, he wouldn't discuss it. Or if he doesn't gain, if he has

nothing to gain from you, he wouldn't even talk to you.

Q. When Rosen visited Karl Home Video, was there an office that was provided for him?

A. No.

Q. Or did he -- Where did he spend his time when he was at the company?

A. Wherever he could. Wherever he parked his rear-end, he -- if there was an open office, available office somebody wasn't using or somebody was sick that day, or a conference room, or even Stuart's office with him in it. There was no specific -- I mean, we all knew that he was a top man and to respect him. So if he came to you said, "Could I use your office," you walked out. You gave him the office.

Q. Did he spend whole days there?

A. A lot of times he did, yeah. Well, not full, full day, but I would say, you know, three-quarters of a day he was there.

Q. Was this in the time when your perception was this was in the heat of the campaign, of the '84 -- the Hart campaign?

A. As far as I could recollect, yeah, around that. To me, from the day when I got involved to the end, was a -- everyday was a heated (sic) Hart campaign. You know, I mean, if he was on the road or in town or

wherever Hart was, was coming, or Hart's assistant called or whoever called, the word "Hart" came out, everybody jumped, you know, because Stuart really, really wanted Hart to become President of the United States or something like that.

So we -- we just didn't want to take any chance.

Q. Please tell me what other activities -- Let me preface that by saying that the transportation area is something that I'd like to leave for a little bit later that we will get into.

But apart from that, please tell us what other activities you can remember that you were aware of that Karl was engaging in related to the Hart campaign?

A. None that I am aware of. Activities, you know, it±'s confidential. Again, if you did it confidentially, not to my recollection. But if you did it confidentially, I am not aware of it.

Q. Well, for example, how did you come to deliver computer equipment to a Hart office?

A. Okay. Now, that wasn't confidentially. The computer was -- that Stuart called me up, buzzed me, and he said there is -- "You got to deliver a computer to Hart headquarters," and you have to go to some-

thing like that. So I went down to the New York West, the modeling agency that Stuart already previously made an arrangement with for me to pick up a computer and deliver it down to Westwood area.

Q. What was the name of that?

A. New York West Modeling Agency. It's a modeling agency.

Q. And what was the relationship between that agency and Stuart Karl?

A. They were friends. I suppose Stuart had invested some money into that agency, or lent some money. The guy owed him. So Stuart said, "He owes me, so go get the computer."

So I physically went down, picked the computer up, put it in the car. He didn't want anybody else to deliver the computer. So I delivered the computer, hand-delivered it down to the headquarters.

Q. What kind of computer was it?

A. I can't recollect, but I believe it was something like an IBM or -- you know, it was a big computer.

Q. A printer, as well?

A. A printer and a whole disk drive and everything.

Q. And where did you bring it?

A. To Hart campaign -- Hart headquarters, the new one that was opening up in Westwood area somewhere, L.A. area, and delivered it up there.

Q. How did you know where to bring it?

A. Well, an address was given.

Q. By who?

A. By Stuart.

Q. And who did you give it to?

A. I don't recall. I don't recall the name.

Q. Was there an individual that you gave it to, or --

A. Yeah, it was an individual. It was a man in his, maybe, thirties, twenty-eight, something like that. But I don't remember his name.

Q. Did you have an impression of what prompted Karl to have this done?

A. Uh-uh. No.

Q. And was Rama White involved in this activity or this transaction?

A. Such as the computer?

Q. Yes.

A. I don't recollect it, no. I can't remember it. I mean, she probably knew about it because she knew -- she had to know where I was going, you know, if she is looking for me, you know. But a lot of times I would

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say, "I'm doing a personal delivery for Stuart," and nobody would question me, where I'm going. You know, if they needed help or whatever or they wanted to know where I'm at, a lot of times I'd say, "It's confidential. I'm doing an errand for Stuart." And then they have no authority to ask me where I was going.

Q. So when you delivered the computer to the Hart office, was there any exchange of, you know, paper, an invoice or anything like that?

A. Nothing. All I did is left the computer and went back to the elevator and went down.

Q. And when was that?

A. (No response.)

Q. Can you try to estimate, as best you can, when during 1984 that was?

A. It had to be in the beginning because, you know, when Hart was beginning to run and everything, they wanted to put a headquarters -- it had to be in the beginning, maybe -- I can't recall exactly. I can't really tell you which month or which day. All I can tell you, I delivered a computer to them around that year.

Q. And you think this was a newly-opened Hart office?

A. Oh, it was newly-opened. I mean, boxes

were everywhere and, you know, books were everywhere. They were just beginning to set everything up.

Q. What was the address?

A. I don't remember.

Q. It was in Westwood, you said?

A. Yeah, I believe it was around Westwood, L.A. district.

Q. So do you know if the Hart campaign paid for this computer?

A. That, I don't know, because they sure didn't give me anything.

Q. Did you have an impression about whether or not they paid for it?

A. I asked no questions. All I did is delivered the computer to them, and that's it.

Yu see, the thing is that -- I mean, when you're asking me these questions, I don't mean to get defensive about it or anything like that -- is all a person, when he has something to do, when he takes something, you don't ask questions. You just take it, drop it, "Thank you very much. Goodbye." You don't even ask the guy's name. You know, I had the guy's name to ask who I should deliver it to, but you don't even handshake with the guy to -- you know, all you want -- all you do is drop it, no questions asked and leave. You

know, that's how it was done. That's how he wanted it to be done. You know, no digging in, no nothing, no provoking or finding out who is who and what's what. If you were supposed to find out about a person, he'll tell you. And if he doesn't tell you about the person, you don't ask questions to that person and find out who they are.

Q. Were you aware of a sale-leaseback transaction between Stuart Karl and the Hart campaign?

A. A what?

Q. A sale-leaseback transaction.

A. No.

Q. Were you aware of a time when Stuart Karl bought furniture from the campaign?

A. Physically, no.

Q. No?

A. I know they requested furnitures and things like that, supplies.

Q. Who requested furniture?

A. From the Gary Hart campaign headquarters in Westwood. I don't know who or what. All I heard was I heard that they wanted office supplies and things like that. And Stuart was fed up with it. You know, he was tired of giving, giving, giving, giving, giving, giving. So it came to the point that he got pissed off.

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He got angry.

Q. Did -- I don't understand. Did someone from the Westwood office call someone, call Karl?

A. Yeah, asking Karl for, you know, office furniture. I don't know. It had to do with the office. I don't know. I can't recall what it was exactly.

Q. Was this after you had delivered the computer?

A. Yes. But I did not handle that. I don't know who did. I don't know if he even did it, you know.

Q. How would you come to know that, just by overhearing?

A. Overhearing, yes.

Q. Or otherwise?

A. Well, you know, I would hear it from Stuart, but not physically saying -- not him coming out and saying, "Oh, they want this, they want that." You know, by him mumbling, anger mumble.

Q. Were you aware of any instances where Karl was directing that invoices, bills or debts of the Hart Committee would be paid by him?

A. Well, I -- the Lear jets, for example, they were under my name.

Q. Leaving aside the transportation for the moment.

A. No. To answer that question, no.

Q. Do you know of any rental cars that Karl provided for the Hart campaign?

A. Yeah.

Q. Can you tell us about that?

A. Well, I can't remember who we delivered it to or what. But I rented cars in Beverly Hills, just your typical Ford or Chevy, something like that, four-door, plain, for Hart campaign people. And I believe, as far as my recollection is that Stuart Karl's father was in the leasing, auto leasing business. So he -- they probably leased some vehicles from there, too, for the Hart campaign.

But, now, if Hart campaign reimbursed them or he paid it out of his pocket or whatever, I don't know that.

Q. When was that?

A. Before the San Francisco --

Q. Convention?

A. -- Convention.

Q. How many cars?

A. I rented two cars. I don't know how many other cars that came out from there that was rented out to the campaign workers.

Q. And who did you talk to at the Hart cam-

paign?

A. I didn't talk to anybody at the Hart campaign.

Q. How did --

A. Stuart Karl had it arranged.

Q. Well, what did you actually do, yourself?

A. Just rent the car and park the car with the keys in it and leave.

Q. Did you pay for the cars?

A. I had -- I believe I did. I can't recollect, but I believe I did. I paid for it and then Stu reimbursed me.

Q. Would you have paid for it in cash or using a check or credit card, or how?

A. I don't remember. I don't remember how I paid for it. A lot of stuff, I used to pay cash for it. So a car, I believe -- I don't remember.

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Q. And, again, as far as the leased cars, did that -- how did you get involved in that? Did that come from Rama White?

A. Stuart Karl.

Q. So did he tell you to do that?

A. Yeah. He says, "Go rent cars," so I went and rented cars. I asked no questions. Then later on I found out it's for Hart campaign.

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Q. Oh, did you not know that it was for the Hart campaign at that time?

A. No, I didn't.

Q. Why did you think that it was for?

A. For a friend, because a lot of times his friends used to come into town. We used to go get cars for them.

Q. Where did you lease the cars?

A. Beverly Hills.

Q. And you parked them?

A. Parked them, left the keys in them.

Q. Did you provide Stuart Karl some sort of reckoning about this?

A. Say that again.

Q. A reckoning. A bill, a writing about how much you had spent.

A. I must have. I had to because I got reimbursed on it.

Q. In what form did you give him --

A. I don't remember.

Q. Well, in the ordinary course, in what form did you -- Was it --

A. Just a piece of paper. I could maybe just take it off of my scratch pad and wrote, "You owe me 250 bucks," and just throw it on his desk. And he would

write a check or he would give the cash. He crumbled the paper or shredded it and throw it away.

I mean, it wasn't like a form, filling out applications to get approval on money. It was -- We had this thing that, you know, nothing was copied or nothing was left. I mean, that was his rules. You know, you followed his rules.

Q. So the reckoning -- Do you understand what I mean now by "reckoning"?

A. Yeah.

Q. The reckoning that you gave him might have had -- would it have had an indication on it of what it was for?

A. I would have wrote, probably, "Cars" on it, "Rental car."

Q. Well, how did you come to know that those cars were for the Hart campaign?

A. Because afterwards, you know, the cars had to be picked up, you know, and I believe we picked one of them up from the airport or something like that. And that's when I found out it was used for Hart campaign.

Q. Who told you that it was?

A. Because the Hart people -- he said, "The Hart people left the car at the airport."

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Q. I'm sorry. Stuart Karl told you that?

A. Yes, Sir. He says, "Pick the car up at the airport. Hart people left it there," or whatever.

Q. For how long did -- were the cars leased?

A. A week, two weeks, three weeks. I can't recall how long. I know they were leased for a while, rented for a while.

Now, I don't know if his father supplied the cars, because they lease it. But I would say about two weeks, probably, on the rental.

Q. But you paid for the cars?

A. Yeah.

Q. For the entire period?

A. Yes.

Q. Can you tell us what you know about something called Gary Hart Video?

A. All I know about Gary Hart Video, was supposed to be a project, a video project for Gary Hart, and it never got done. That's all I know about it. They never had -- I never saw a budget of it or I never saw the -- all I saw was clips taken of Gary Hart during a speech on regular television. They were going to edit it and go out and shoot Gary Hart while he was walking and talking, you know, about campaign whatever, you know. And it never got done. As far as I could recall, it

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never got done -- unless if it got done, they never showed it.

Q. Whose project was it at the company?

A. Stuart's project. What do you mean? Who had the responsibility of doing it?

Q. Yes.

A. I can't recall who had the responsibility of doing it. I guess everybody had a hand in it, you know. It's a project that's a group project. Any project that we do we all get involved.

Q. Would there have been an associate producer?

A. No. It would have been a full group project.

Q. Why?

A. Why? Because it's not a credit project. It's more like donation project. You know, you would donate your time, or if you do it, it's not -- I mean, it's not going to be shown, a motion picture in somebody's home where you wait for the credits. So why would you want your name on it? I mean, that's the attitude we had, unless if I was a free-lancer and if I was using that as a portfolio for my other jobs, sure, I would put my name on it.

Q. Did you have a sense of how far from com-

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pletion this project was? How much work had been done on it?

A. Not much, as far as I can recall -- remember. Not much. I mean, a lot yet had to be done to it.

Q. What work had been done already?

A. Well, they had gotten clips from Gary Hart interviews and things like that, and I suppose they had gotten out to a location and shot Gary Hart talking, you know, filmed him while he was talking, walking by the ocean, narrating some -- I don't know what it was. But they still hadn't got to the major, major heart of the video.

Q. So are you saying that some of the materials they had may have been pre-existing that they got from elsewhere, others -- Is that a "yes"?

A. Yes, Sir.

Q. And others may have been things that were actually shot for this project?

A. Yes, Sir.

Q. And were those several clips or --

A. One clip was actual shot, and the rest, I could remember, was all clips taken from news or when Gary Hart went to the convention, then on and on stuff that they put together. They were trying to figure out

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how to put it together and what they should do and what's missing, what should they go out and do. But it never got finished, you know, not to my recollection, because I never got to see it -- or the advertisement, never got to see it, you know, whether it was going to be on television and all that stuff, promotion.

Q. Well, would you have participated if the project had moved along to completion?

A. Oh, yeah. I would have made the budget, or I would have doublechecked the budget, or I would have supervised the budget or helped people to go into directions or whatever that -- or I would have been to the headquarters, them to call me and ask me questions or whatever. But my position and my duty, I never got to do it. And neither the -- a lot of the people that I know got involved in it, people that was in the group, you know, working. You know, you've got your Duplication Department. You've got your Editing Department.

Q. I'm sorry. And are you saying they had -- those people had done substantial work on it?

A. No. I'm just saying that it never got finished. If it would have got finished, we would have all got involved in it. It never -- you know, all we got involved -- all I remember seeing was those little bits of clips.

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Q. So it was really at sort of the infant stage?

A. Yeah. It's like it just stayed the way -- on a limbo. You know, it just stayed the way it is.

Q. Well, do you know who was responsible for shooting the one fresh clip?

A. Uh-uh. No.

Q. Do you know who at the Hart campaign was the liaison for this project?

A. No, I don't.

Q. Was Rosen involved in it?

A. As I -- as long as I could recollect, Rosen was around at the time, but I don't know if he was involved in it or not. He was around the editing bay and viewing it, too, but I don't know if had the authority.

Q. How many instances were there where the clip and the pre-existing clips were shown?

A. Once, to my knowledge, because everybody walked out. You know, we were all standing there. It's in the hallway, and you have a big door, and you could just lean against hallway. And somebody just saw Gary Hart talking and a couple of other things, and you -- they said, "Sure, that's what they all say," and then, you know, just kidding out, kidding around. And then that was it. I didn't even watch. You know, all we

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saw is little bits and pieces, and that's all they had at that time. We never went back to it.

Q. And when was that?

A. Again, the middle of '84.

Q. Was that after you had been reimbursed for your contribution or before?

A. I don't remember that. I mean, I can't really say.

Q. Is there another event that you can associate that it took place before or after? It was before the convention, the National Convention in July, do I gather or not?

A. Yeah, the big San Francisco --

Q. Yes. It was before that?

A. Yes.

Q. Do you know if the company ever sent a bill to the Committee for some of these -- some of the -- the rental car or other things?

A. I really don't know if they did or they didn't.

Q. Okay.

A. Do we have more to go on on this?

MR. BERNSTEIN: Why don't we go off the record for a minute.

(Discussion off the record.)

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BY MR. BERNSTEIN:

Q. Mr. Kantzabedian, what I'd like to do is ask you just a couple more general questions, and then I'd like to get a little more detail into the transportation area that we've bee avoiding so far today.

A. Okay.

Q. Can you tell me first who else might have better, more direct knowledge of Stuart Karl's campaign activities?

A. I guess when you get in touch with Rama White, she would have a better knowledge. The only person I could think of would be Rama would know that, Stuart's activities, more than I would because she did his scheduling and appointments.

Q. Anybody else at the company?

A. Not that I could recall, no.

Q. So is it possible that they might have more knowledge, but you are not in a position to know whether they do or not?

A. Yeah. As far as you asking me if I know, I personally don't. If they already did have the knowledge or if they discussed about it between each other, then it's something that, you know, I guess you'll find out as you go along.

I -- you know, my position and my -- within

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Karl was a different department than getting involved any other deeper, you know, with the other people or anything like that. Who would know or who's aware of the situation or aware of the Hart campaign, that I don't know.

Q. How about the individuals who were Karl's closest personal friends?

A. It's a possibility.

Q. Who would they be?

A. Who would they be?

Q. Who are they? Were they.

A. I don't know. I mean, Stuart had a lot of friends, intimate friends. I can't just -- I mean, he had a lot of friends. I mean, I don't know who they are. I mean, he had a lot of close people to him and people he would associate with. But personally to pinpoint them, I -- you know, I don't know who to pinpoint to.

Q. Let me also ask you. There were -- Let me give you the names of two individuals who were associated in one way with the Hart campaign. And my question is simply whether the names are familiar to you from the activities that you know.

The first is William Shore or Bill Shore.

A. It sounds vaguely familiar. Bill Shore.

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I could have just heard the name. I don't know any knowledge of what his responsibilities are or what he does.

Q. How about Chris Townsend or Christopher Townsend?

A. No, that name I'm not familiar with.

Q. All right. What I'd like to do now is ask you, please, to tell us how you came to be involved and what you did in connection with Stuart Karl's flights and his provision of airplane transportation.

A. I'd take care of Stuart Karl's, you know -- as far as taking care of him. Now, as far as the planes came along, I always scheduled him, you know, for the Martin Aviation because he liked flying pilot. That's how it all started.

Now, I don't know which flight --

Q. Well, no. Let's take it first things first. When did you first start doing this for him?

A. I don't remember when I started doing it. I've been doing it ever since I became his right-hand man. I've been doing everything for him, so I can't really pinpoint down to you and tell you when I started doing it.

Q. It was one of the many duties you had?

A. Yes. You know, I mean, it's like making

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an appointment in a restaurant, making a reservation in a restaurant, no different than making the reservations for flights.

Q. So how did you do it? Did Karl give you instructions? What instructions did Karl give you?

A. Karl told me to rent a -- get a plane, "Reserve a plane for me." I called Martin Aviation, and I say, "Put a plane for reservation," you know, "Reserve a plane for us." Gremlin G-2 or whatever, you know, Citation.

Q. What are those planes?

A. Which is a jet. Gremlin G-2 is a -- like a twelve-passenger, something like that, jet. Citation, Lear 35's are, like, five people or six people. You know, I mean, you cram them in there. But four people can fly comfortably.

So I all up and make the appointment. I mean, you know, I make the reservation.

Q. Did he tell you what the destinations were?

A. No. A lot of times destinations were told to go, let's say, for -- I would tell the Martin Aviation where the destinations are. But a lot of times destinations used to change, you know. It never stayed the same. I would tell the Martin Aviation that he's flying, let's say, to Jackson Hole, Wyoming and back

and whatever, you know, and he's going and coming. But a lot of times, you know, they would change it.

You know, Stuart used to make appointments and then cancel them. He used to pay for the plane sitting there and never fly it.

I mean, you know, you probably have -- as I see you have the records in front of you, you probably have a lot them that cancellations in there.

Q. Did Karl tell you who the passengers were going to be?

A. Most of the time, no. If it was a private personal thing that I didn't fly with him, I didn't ask. All I asked, how many people were flying, because they wanted to know so they could cater them food.

Q. When was catering ordered?

A. All the time. Most of the time there was always something. Either the pilots would bring it as a gift or Martin Aviation would just even put it in there without even charging us, you know, because we flew with them so many times. A lot of times, if we were going long distance flight, we would have the sandwiches and things like that.

Once we flew, I believe it was, Chicago or somewhere, you know, long distance. We had catered food. Anything over an hour flight, to us, we would

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have something to munch on.

Q. So the provision of catering or not wouldn't distinguish the purpose of the trip?

A. No, Sir.

Q. Can you tell us how it came that you ordered these in a name other than your name or the company's name?

A. Well, he wanted to keep it -- you know, he didn't want a lot -- for his private flights, you know, like his mistresses, he would fly them around or whatever. He didn't want the company to know. And at that time, it was Dennis Blackburn, and they always used to have arguments, spending too much money, this and that. So in order to avoid that hardship, I used to put it under my name, you know. And I used Abraham Levon, which is short, my middle name. I mean, there wasn't any intentional -- it wasn't any specific reason that you should put this under your name and nobody -- no. All it was, because of his privacy. He didn't want -- He felt like that at least he owed that much to himself without telling anybody else how to spend his money, what to do with his money or what he can do. That's one person that Stuart Karl, you couldn't tell him what to do.

Q. So did the people at -- I'm sorry, what

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was the name of the charter service?

A. Martin Aviation.

Q. And who did you deal with at Martin Aviation?

A. I can't recall his name. I know Chris Callas was the pilot. I can't remember the -- there is a gentleman that Gary Hart also -- was the manager or something like that, in Martin Aviation.

Q. Is the name Mike Severy familiar to you?

A. Mike Severy. There you go. Mike Severy.

Q. So did you place the orders with him?

A. Yes, or whever. There was a Cathy there, too, that I used to put the orders to. They more or less knew who I was. So whoever picked the phone up and was at that minute happened to be at the Chartering Department knew me from overhearing the others or whatever. So they had a priority. You know, they give us pretty good priority. And whatever we needed, anytime, anytime, any day, they give it to us with no -- I mean, they wouldn't even take a list of passengers. Usually they take names of passengers, but we refused to give them names of passengers. We only tell them how many people flying, two or three. Sometimes we say two, and four people show up.

Q. Did you sometimes give them lists of pas-

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sengers?

A. No, I never did -- not that I could recall. Let's put it that way.

Q. And where were the bills sent for these flights?

A. They was either sent to my home -- at that time my residence was 280 Cagney Lane in Newport Beach -- or there was a P.O. box, was sent to a P.O. box, which it was an address P.O. box.

Q. I'm sorry?

A. Address P.O. box, meaning that they don't give you a number. They give you an address.

Q. What was the address; do you remember?

A. Oh, 177 Riverside.

Q. Was that P.O. Box --

A. No, no P.O. box.

Q. Was that address used just for these bills?

A. No. Well, yeah. Well, any --

Q. Or other bills?

A. Other bills, other stuff. But nothing -- you know, nothing -- all was used for personal stuff or stuff that he didn't want to go to the office, we sent it there.

Q. Can you relate to us -- We understand that the number of these charters is voluminous, that it was

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done quite a bit. And my question is what your best recollection is of those trips that were somehow related to Gary Hart's campaign or Gary Hart.

A. I can't -- To be honest with you, I can't really answer that because I don't know, you know, if it was a business or pleasure or whatever because there was always pleasure involved with the business and business involved with the pleasure.

I could recollect that a couple of times, three or four times, something like that, that Doug Rosen happened to be on the plane with us. We picked him up somewhere or we -- and then he flew back with us. Now, it could have been a private -- I mean, it could be personal. But then they discussed business, too. So I can't specifically pinpoint date, time or place or direction going.

Q. Well, would the destination of the plane distinguish between private and business?

A. No. It doesn't matter if the plane was just -- We flew to Lake Tahoe one day for lunch and came back, and it was a business lunch. But we flew up there. We just felt like doing it. So destination means nothing unless if he happened to be going to that direction and for a specific reason of the campaign. Then you could pinpoint together and say yes.

And you probably -- if you do research, you probably find there is a private charter to San Francisco at the time of the campaign. You know, you could put that two and two together and say, okay, that's -- you know, you could point at it and say, "Yes, this is definitely used for that." But a lot of it could have been used for that reason, but it's -- I --

Q. Well, were there other business reasons or other personal reasons for trips to San Francisco other than the campaign?

A. Yeah, for fun.

Q. How about trips to Washington, D.C.?

A. Washington, D.C. was taken for business. It had nothing to do with the campaign.

Q. What sort of business?

A. It was a -- I guess he was going to come in front of a Congress to discuss about the video piracy and all that stuff so they could stop -- pass a law to stop the piracy, or if they catch them, a penalty, something like that.

Q. Was that one instance or more than one instance?

A. As far as I could recall, it was one incidence.

Q. Do you remember when?

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A. No.

Q. How about trips to Las Vegas? Would those have been business or pleasure or what?

A. Business and pleasure.

Q. Did you have an impression any of those were campaign business?

A. Not to my recollection, no.

Q. Okay.

A. Even if it was, I wouldn't have known. All the flights, anywhere those flights went, it could have been and it could have not been, you know.

Q. Were you aware that Gary Hart was transported on any occasion?

A. The only one I was aware was the Gremlin G-2 when Gary Hart was going for some campaign again to San Francisco or -- I don't recall where it was going to, that we had -- there was the plane picked him up and took him around. That's the only recollection, as far as I can recall, something like that happening.

But as far as us -- as far as me personally calling up, making an appointment to pick Gary Hart at such-and-such place, I don't remember. I probably could have done it or --

Q. So your knowledge might have come from either placing it or fromother sources?

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A. Yeah. I don't remember doing it, but if I would have done it, then, you know, it was -- then it would be there. If you have the records in front of you, then you should see. If there's a pick-up on Gary Hart, it would say on there, "Gary Hart."

Q. And how would that -- how would the charter service have known to have done that? Would you have told them that?

A. Because the pilot will put it in his log.

Q. And how would the pilot know that he was to do that?

A. Well, if pilot picks Gary Hart up, you would think that he would put it on his log, "Picking Gary Hart up."

Q. Would you or somebody else at Karl's company have told them to do that?

A. We probably, if -- I'm saying, if I didn't tell them or whatever, to go to the location, and when they arrived to that location and the party gets into the plane, they would automatically log by visual on knowing the party -- like, they knew me visually. They would log my name. They knew Stuart visually; they will log his name. So if they knew Gary Hart, they know Gary Hart, they will log his name.

Q. Do you think there might be instances where

Gary Hart might have been transported that they wouldn't have logged his name, or not?

A. That, I don't know. That depends on the pilot. You should question the pilot on that.

Q. And what was the pilot's name, again?

A. Chris Callas.

Q. And was he the pilot in all of the flights?

A. Most of the flights. There were other pilots, you know. He had -- Chris Callas was -- the only reason I remember his name, because he was our favorite pilot. That's how I remember -- favorite.

Q. Why was that?

A. Well, because the guy was always there on time -- and not only on time; he took care of us. He was -- We just liked him. There was no specific reason.

Q. Can I ask you if trips to Colorado had been in connection with Gary Hart and/or his campaign?

A. That, I don't know.

MR. BERNSTEIN: Let's go off the record for a moment.

(Discussion off the record.)

MR. BERNSTEIN: Mr. Kantzabedian was starting to relate off the record, and I'd like him to just repeat it, what his actual participation was in the

arrangement of these flights and the knowledge that he or didn't have of what the flight's purpose was.

BY MR. BERNSTEIN:

Q. Could you maybe just --

A. My recollection as far as the flight purposes are -- I made the appointments, made the reservations. Even if I would have flown with them, I wouldn't have known exactly what the reason of the flight was other than just being with Stuart all the time. I didn't ask questions. All I did was follow orders. And my order was to be there physically, and I was there physically. And if he wanted me to go rent a taxi and sit in a -- hire a limosine, I'd go down, run outside and rent a taxi or hire the limosine. That was my duty. I did not ask questions, where they were going and why was I with him.

That's what I'm trying to say, is that as far as all the records you have, I could have been in the plane with Gary Hart and flying -- I'm just saying, you know, which I never was, but I could have been. But I still wouldn't know.

But now, back to that again, I should back up. If I was in the plane with Gary Hart, flying with Gary Hart on the same plane, then I would have said, hundred percent that, hey, what else is for. But me

not being there physically -- or flying and Gary Hart flying back in the sameplane or whatever, then it's something that, you know -- Now, as far as Stuart Karl flying with Doug Rosen to destinations and this and that, I could assume that it was for business because, you know, Doug Rosen gets up and they're talking and they drop him off, like a piggy-back. You know, it's like he's getting a free ride without reporting it or whatever. I could understand that, and I could say maybe. But at that time, I wasn't even in the knowledge of if he was.

Q. How many instances was that?

A. Maybe about three or four instances like that.

Q. And your impression was that Rosen was on his way -- or, what was your impression about that?

A. My impression was the guy happened to be in the neighborhood and needed a ride and we give him a lift.

Q. Do you have any impression of why he was going where he was going?

A. No, no.

Q. And do you infer that it might have been campaign activity or --

A. I feel like it was a campaign activity.

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But then, you know, then I could be wrong.

Q. Why would you feel that it was?

A. Well, because, you know, it was at the time of Gary Hart campaign. You mean, I mean, not physically going to the campaign or anything like that. But when -- you see, all I could think of Doug Rosen is by getting involved with Gary Hart. So everytime I would think of Doug Rosen, then I know is the subject about Gary Hart. And if I would have met Doug Rosen as a producer of motion picture, everytime I see him I would think of him movies. Do you understand what I'm saying?

So it's very hard to answer those questions and very hard for me to pinpoint down and tell you if it was a business or not, because the only reason for that is I have no knowledge if it was a business trip or a pleasure trip or if it had to do anything with political involvement or whatever.

I wish -- I should have -- I wish I would have known, you know, as I'm being on the plane and that I asked questions, "Where are we going? Is this business, Boss, or is this pleasure, Boss?" But, you know, it's -- you learn to respect the privacy in matters like this because most of the time it was for his -- a lot of flights, it could be under different name, but it

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was for his ladies.

Q. Were you ever on a flight with Gary Hart when he was on the plane, as well?

A. No, not that I could recall. No.

Q. In the instances you described where Rosen was picked up and came along, those were all ones where you were on the plane, as well?

A. Yes, Sir.

Q. Now, you were earlier describing that you did remember that one flight, or perhaps more than one flight, to San Francisco was in connection with the Democratic Convention?

A. As far as I can recall, that I went physically to the convention, was that I was with Stuart. Doug Rosen was there. Any other flights, I don't --

Q. Who else was on the flight?

A. Stuart Karl, his wife. And I can't recall that if I went there private and came back private or if I went there commercial and came back private. That, I can't recall, because a couple of times on certain other trips that I don't remember where it was, but I went commercial and came back private.

An instance when -- Las Vegas convention we were going to. I drove and flew back private.

Q. I wonder if I can ask you if you recognize

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the names of any individuals who may have been on some of these flights and what, if any, familiarity you have with them.

Do you recognize the name of Jeff Jenest, J-e-n-e-s-t?

A. No.

Q. How about Nathan East?

A. I don't recall the name.

Q. How about Levon Helman, H-e-l-m-a-n?

A. Levon Helman. Helman, Helman. There's a performer -- there's a singer, Levon Helman. Yes, I flew with him. He's a performer.

Q. Did Karl transport entertainers?

A. Uh-huh. Yes.

Q. Was that a frequent occurrence?

A. No, not that frequent.

Q. Were those flights that you went on, as well?

A. Some of them I did; some of them I didn't. With Levon Helman, I believe I happened to be on the flight. I had to be on the plane to make sure everything was okay. And if I'm thinking of the right person, I think he's in the entertainment -- or he's a singer.

Q. Do you have an impression about whether the flights that entertainers were on, whether any of

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them were campaign related in any way?

A. No, Sir, I can't recall.

Q. You don't have an impression about whether --

A. I can't recall. You know, I can't remember if it was or not. But I don't think so.

Q. Do you recognize the name of Cooper, last name?

A. Cooper?

Q. Uh-huh.

A. Sounds familiar, but I don't -- can't place the name and the face together.

Q. How about Jonnie Layman?

A. No, it doesn't ring a bell.

Q. That spelling is L-a-y-m-a-n.

A. No, it doesn't ring a bell.

Q. How about Dean Bender?

A. Dean Bender?

Q. Yes.

A. That rings a bell. That sounds familiar, very familiar.

Q. Is he connected with the company?

A. Dean Bender? I don't know. I don't remember him. I mean, I remember the name. It sounds familiar. But I can't recall what his duties or anything, if he was connected or not.

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Q. How about Steve Rivers?

A. No, that doesn't ring a bell. Steve Brievers (phonetic)?

Q. Rivers.

A. Rivers? R-i-v-e-r-s?

Q. Yes.

A. No.

Q. Gino Thinasquieu? It's spelled T-h-i-n-a-s-q-u-i-e -- or i-e-u? No?

A. No, that doesn't ring a bell?

Q. Doug Ayers, A-y-e-r-s?

A. Doug Ayers? That sounds familiar.

Q. How about Griff Amies?

A. Uh-uh. No.

Q. How about Con, spelled C-o-n, Gillum, G-i-l-l-u-m?

A. Gillum?

Q. Yes.

A. Gillum, Gillum. No. But, then, I could have -- again, you know, I could have met these people very short time, not remembering their names.

Q. Do you recognize Bob Roark?

A. Yes.

Q. And who's he?

A. Bob Roark is a friend of Stuart Karl, good

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friends.

Q. Were they business friends?

A. Business and personal friends.

Q. Do you know what his business was?

A. Bob Roark used to work with an aviation company. I can't think of the name of the aviation -- but then went into business with Stuart Karl.

Q. What business was that?

A. Something to do with business to business video portfolios, advertisement. I don't know.

Q. Was this a separate company of Karl's?

A. Yes, separate company. Karl was involved. I don't know if it was all his.

Q. What was the name of it?

A. I don't remember the name.

Q. Do you recognize Richard Wagner?

A. Yeah, that sounds familiar. I don't --

Q. Do you recognize Marvin Murphy?

A. I can't recall that. I can't remember that. It doesn't ring a bell.

Q. Now, what I think you've been saying is that you may have got the impression that some of these flights had some aspect of -- had some campaign-related nature, and some of them you may be stronger about your impression than others; is that right?

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A. Yes. I mean, you know, I can't pinpoint down which one, where or who. I mean, you could have flights to Washington, D.C., two of them, or Colorado, fifty of them. You know, I cannot tell you that this one was for Gary Hart campaign and this one was for campaign. All I can tell you is those questions you should -- when the time comes, you could ask them and they'll be better to answer than I would be.

MR. BERNSTEIN: Off the record for a minute.

Tape 6

(Discussion off the record.)

BY MR. BERNSTEIN:

Q. Can I point to you that in the lower part -- and what I'm referring to now is the flight log, which we are shortly going to mark as FEC Exhibit No. 2. In the lower right-hand portion there are notes there, and can you read the notes?

A. Sure. It says, "Have catering on board, Danish, fruit, sandwich tray for ten. Trays" --

Q. That's all right. You needn't go any farther. Is this -- Would the ordinary course of this have been for you to order the plane, to provide the number of passengers and also to arrange for food?

A. Yes, Sir. Well, all it is -- they know the destination, and they know that if it's a long des-

tination that you got to have food on there. And if it's flying to Washington, D.C., that's a approximately four-hour, I believe, four-hour flight.

Q. This indicates that there were four passengers from Orange County to Washington, D.C.

A. Yes, Sir.

Q. Who were those passengers?

A. I don't know. I probably would have been one of them because I remember going there with him. But I don't remember who the rest were.

Q. Do you mean that if this indeed were a flight to Washington in connection with Congressional testimony, that you were involved, that you went along on that flight?

A. Yes, Sir.

MR. BERNSTEIN: Off the record for a moment.

(Discussion off the record.)

MR. BERNSTEIN: I have handed to the reporter Exhibit No. 2, which is the flight log that we've just been discussing.

(The document referred to was marked Federal Election Committee Exhibit No. 2 for identification.)

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BY MR. BERNSTEIN:

Q. What we're next showing you, Mr. Kantzabedian, is a flight log indicating a flight, again, that was billed to you in April of 1984, indicating that Mr. Karl is a passenger with four additional passengers for a flight from Orange County to Denver to Washington, returning to Denver and again to Orange County. And, again, this was a flight which the log indicates took place on the 10th, 11th and 12th of April, 1984.

A. Okay.

Q. Could you tell us about that?

A. I don't recall this at all.

Q. Did Stuart Karl have any business other than campaign business in Denver?

A. I believe he had friends, but I can't be sure of that. I don't recall this at all.

Q. Can you remember any other purpose than a campaign purpose for a flight to Washington other than the explanation you already offered of one instance of the Congressional testimony?

A. You see, you got to realize one thing, that he had the video industry also. So he could have been flying to Washington, D.C. for certain other reasons -- I mean, for P.O.P., like marketing or whatever, distribution. So I really couldn't pinpoint down and

tell you if it was a business, pleasure or has anything to do with politics.

I mean, that is a lot of hours and a lot of flights.

Q. Do you know if you attended this flight, if you --

A. No, I wouldn't know if I did. I mean, with that many stops, I wouldn't know. I don't recall.

You got to realize one thing, too. A lot of times the flights were under my name and everything, so other people could have had called in under my name and made a reservation.

Q. Who else at the company did that?

A. Rama could have done it.

Q. Anybody else?

A. No, I can't -- well, I shouldn't say "no." I really don't know if anybody else would. But, I mean, if anybody wanted to, they could have. Or if I wasn't there that day, somebody else made an appointment.

I don't know if you have on your records other names than mine.

Q. Well, do I understand that, at least during the period of time we're now discussing, you were the person who was at least primarily responsible for --

A. Yes. 1984, yes.

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Q. But this -- the flight log and the invoice doesn't really refresh your recollection at all, Mr. Kantzabedian?

A. No, Sir, it doesn't.

MR. BERNSTEIN: Let's mark this as Exhibit No. 3. I am handing this now to the reporter as FEC Exhibit No. 3.

(The document referred to was marked Federal Election Committee Exhibit No. 3 for identification.)

BY MR. BERNSTEIN:

Q. The flight log and invoice that Celia is handing you now, Mr. Kantzabedian, reflects a flight, also in April --

A. Okay. On this one, it's April, as you can see, authorized by Rama White. This is not my authorization. I did not make this flight, so I couldn't have any recollection of this.

Q. Where was the bill sent for this flight, Mr. Kantzabedian?

A. It was sent to me.

Q. So how would that have taken place, then?

A. What do you mean, how that could have taken place? Without my permission doing this reservation?

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Q. Yes. How would that have happened?

A. Very easy. I mean, she's Stuart Karl's secretary. And it's billed to me, billed to my address. It would be sent to Abraham Levon, which is indicated over here. An automatically, whatever record they have in their files, they send it to my place.

Q. Why did it take place that in this period of time Rama would have given --

A. I don't know. I really don't know. I must have been busy, or I must have been somewhere.

As you could see over there, it says, "Doug Rosen" --

MR. BERNSTEIN: Yeah. Mr. Kantzabedian is pointing out that in the line which seems to indicate the names of passengers is written "Doug Rosen" on this exhibit.

THE WITNESS: But anything else, I cannot -- I mean, this is -- I could be able to answer you this.

BY MR. BERNSTEIN:

Q. Can I point out that in the lower right-hand corner, Mr. Kantzabedian, there seems to be an indication, "P/U," presumably standing for "pick up" --

A. Pick up.

Q. -- "Doug Rosen." And at the bottom there's something which seems to mention Denver. Do you think

that sheds any light on --

A. Possibility, it's a pick-up and a deliver, you know.

Q. Did that happen frequently?

A. Not that I could recall, no.

MR. BERNSTEIN: We've now handed that flight log and invoice to the reporter as Exhibit No. 4.

(The document referred to was marked Federal Election Committee Exhibit No. 4 for identification.)

BY MR. BERNSTEIN:

Q. Mr. Kantzabedian, the next flight log and invoice that Celia's handing you is one which seems to have been a Palm Springs flight in May of 1984.

A. That was a pleasure flight. I remember this.

Q. And it indicates that a passenger was Harold Weitzberg and also, at least on one leg, Mr. Shannon?

A. Court Shannon.

Q. Court Shannon?

A. Yeah. This was a pleasure -- this had nothing to do with any business or anything like that. This was a pleasure.

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Q. Do you say that because you remember this flight?

A. Yeah, I remember it. That's why I said.

Q. Okay.

MR. BERNSTEIN: That's Exhibit No. 5.

(The document referred to was marked Federal Election Committee Exhibit No. 5 for identification.)

THE WITNESS: I believe it was a birthday or an anniversary of Stuart Karl's wedding.

BY MR. BERNSTEIN:

Q. I'm now handing you -- Celia's now handing you a flight log which is actually one, two, three, four, five -- it's actually six pages. I would like you to turn to the last page, which appears to be a summary invoice that Martin Aviation sent you.

A. These are helicopters, the $594.80. As far as I could recollect, they're for helicopters. Anything that started with "N", I believe they were helicopter numbers. Santa Fe. Now, Santa Fe -- let me look at the bills and I'll tell you. Let me look at the charts here. San Francisco. Santa Ana. Karl party. Well, they went to San Francisco a lot. Flight, Santa Ana, San Francisco. That's

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-- no, that's not a helicopter. That sounds like a Citation.

Q. What kind of plane is the Citation?

A. It's a jet, Lear. Lear jet; they call it Citation. Bigger, I believe.

Okay. This was -- as far as what I could recollect, this was a business trip to do with -- something to do with he had to get on a talk show or something like that regarding the Jane Fonda tape.

Q. Which trip are you referring to, particularly?

A. Well, the San Francisco trip. The other ones -- Santa Fe, I believe. Let's see. You see, it doesn't correspond with this here. I have a bill here for -- let's see, federal tax, total of $4,582. And here it is, Santa Fe, San Francisco, Santa Monica. The four seventy-five; I believe that's a helicopter.

Q. Does "SMO" stand for Santa Monica?

A. Huh?

Q. Does "SMO" stand for Santa Monica?

A. I believe it does.

Q. And what business or purpose would there have been for trips to and from Santa Monica?

A. Because, well, the Lorimar Studios isn't that far away from there. So if you fly down to Santa

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Monica and catch a cab or limosine or whatever, it's twenty minutes away from Lorimar Studios.

Q. So the --

A. Not like sitting in the traffic like I did this morning, for three hours; you would be there in twenty minutes. So which one would you prefer? If I had the money, I'd go twenty minutes.

Q. So the trips to Santa Monica by helicopter might have been in connection with visits to Lorimar Telepictures?

A. Yeah.

(Pause)

MR. BERNSTEIN: And we have handed that, as Exhibit No. 6, to the reporter.

(The document referred to was marked Federal Election Committee Exhibit No. 6 for identification.)

BY MR. BERNSTEIN:

Q. Can I ask you generally, flights that might have taken place to Boseman, Wyoming, what --

A. Jackson Hole, Wyoming?

Q. No, not Jackson Hole. Boseman, Montana. I'm sorry.

A. Montana.

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Q. What would those be in connection with?

A. I believe he was going to buy a place in Boseman, Montana -- Stuart Karl, buying a ranch or -- I don't know. But he was looking for property. So it could have been in connection of looking for a property and vacation.

Q. Do you have a recollection whether any flight to Boseman might have been campaign-related?

A. No, Sir, I don't.

Q. You don't have a recollection one way or another or you don't think they were?

A. I don't have a recollection.

Q. Okay.

(Pause)

Mr. Kantzabedian, the next flight log is one which indicates a flight in May of 1984 from Orange County to Santa Monica and return.

A. Okay.

Q. And I wonder if you can tell us what this flight might have been about.

A. Well, same thing, again. Made trip from Santa Monica to Burbank, Burbank to Santa Monica. As you could see underneath, it says "Per Gary Hart" -- (asides). So this sounds like it's a Hart campaign thing. I had no -- I don't have a recollection at this

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moment why this was made like this, but I suppose it has to do with Gary Hart because his name is mentioned right underneath, on the right bottom corner, if you could see it on yours. Do you see it?

Q. Well, does that refresh your recollection about this trip?

A. No, it doesn't. I mean, I don't remember.

Q. Is that news to you, that it was per Gary Hart, or is that -- does that note indicate that that's something that someone told the charter company?

A. Exactly. Somebody must have told the charter company after I made the arrangements. And so it says, "Do not bill customer Abraham."

Q. What does that mean?

A. Well, meaning that, supposedly, I guess, it's confidential.

Q. Did that mean --

A. Meaning that it should not be billed to Gary Hart; it should be billed towards me. So there is no record of it. That's the only understanding -- by looking at this, that's the understanding I have.

Q. So it's not quite right. Although it says, Do not bill customer Abraham," you think --

A. Yeah, they're meaning --

Q. Bill customer Abraham?

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A. Exactly. Burbank -- okay. Bill me, but don't bill Gary Hart.

Q. When it says "Per Gary Hart," what would you infer that that means?

A. "Per Gary Hart," it's for Gary Hart.

Q. So I guess my question is, would you have told the charter company or --

A. If I would have told the charter company, they would mention it in there under "Notation" that I made the inquiry, what I want and what I want to be done. Now, if I haven't made -- you see, I would make certain notation and tell them I want certain things. I don't know if in the other ones they have marked it, but I'm sure they would mark it down that they was -- I have told them what to do.

Now, this call could have been made afterwards or maybe I could have said it to them. But I don't recollect it, saying it to them.

Q. Can you think of any other purpose that this was per Gary Hart -- Strike that.

Do you think this means that Gary Hart was transported?

A. What else -- well, see, we got one little problem here that we got to solve. There is also -- Gary Hart also works in Martin Aviation; okay?

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Q. Yes.

A. So this could reflect on him. He could have probably -- "Per Gary Hart," meaning Gary Hart told him at Martin Aviation that do not bill customer, meaning Stuart Karl, but billing me. Now, you have two ways you could take this.

Or if it doesn't go that route, that means it's for Gary Hart. Otherwise, why would we put his name on the --

Q. Well, do you remember any instance where Gary Hart, the candidate, was --

A. Went to Burbank?

Q. Yes.

A. No, I don't. That's what I'm trying to figure out. I don't. I don't remember it.

Q. How about to Santa Monica?

A. No, I don't remember.

MR. BERNSTEIN: And this is now FEC Exhibit No. 7.

(The document referred to was marked Federal Election Committee Exhibit No. 7 for identification.)

BY MR. BERNSTEIN:

Q. Mr. Kantzabedian, this is an invoice and

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flight log which indicates a flight in late May to San Francisco and other places. Please look at it and tell us if you can recall what this flight was about.

A. I don't remember. I mean, you got all those flights in front of you. I don't remember. I don't. You know, I mean --

Q. That's fine. But, you know, if there are others of these that your recollection can be refreshed, and so if, you know, this doesn't help and you can't remember it, then you can't remember it.

A. I can't remember it because we had so many flights to so many places. You have the files in front of you, and I just don't remember.

Q. Okay.

MR. BERNSTEIN: This is Exhibit No. 8.

(The document referred to was marked Federal Election Committee Exhibit No. 8 for identification.)

BY MR. BERNSTEIN:

Q. Mr. Kantzabedian, this invoice indicates again, apparently, a flight in late May, and I wonder if you can recall what this flight was about.

A. Van Nuys, Santa Ana, Long Beach, San Francisco, Santa Ana, Van Nuys --

Q. The itinerary on the first page, Mr. Kantzabedian, indicates that it was contemplated that sixteen people would be transported from Long Beach to San Francisco.

A. This could have been a pleasure flight. I don't remember. It could have been a pleasure flight.

MR. BERNSTEIN: This will be FEC Exhibit No. 9.

(The document referred to was marked Federal Election Committee Exhibit No. 9 for identification.)

BY MR. BERNSTEIN:

Q. Mr. Kantzabedian, in instances where you, yourself, were transported, what would -- what were the purpose of your traveling --

A. Could I see that?

Q. Oh, certainly, if you'd like.

A. Yeah, to see if it will refresh my memory.

Q. Yes. We're now handing you an invoice reflecting a flight that was on June 8th, in which it indicates among the passengers, "Abraham plus one."

A. This could have been one of his mistresses.

Q. Do I gather you don't think that this might have been a campaign-related --

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A. No.

MR. BERNSTEIN: And this is FEC Exhibit No. 10.

(The document referred to was marked Federal Election Committee Exhibit No. 10 for identification.)

BY MR. BERNSTEIN:

Q. This next one, Mr. Kantzabedian, apparently has to do with a cancellation fee for a limosine in San Francisco?

A. Okay. Probably, he was going to go on a trip and he didn't go, and they canceled it. That's the only thing that I can think of.

Q. Well, did he frequently have a limo in San Francisco?

A. He had a limo wherever he went. You know, the man --

Q. But there's nothing particularly special about this one?

A. No.

MR. BERNSTEIN: FEC Exhibit No. 11.

(The document referred to was marked Federal Election Committee Exhibit No. 11 for identification.)

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BY MR. BERNSTEIN:

Q. This flight log and invoice reflects flights in early June --

A. Burbank, Santa Monica, San Francisco, Burbank, Santa Ana.

Q. And I guess I'd ask you, as you're going through these, to try to remember the context of the time in terms of Mr. Karl's or Rosen's, you know, campaign activities and to try to recollection what you can about these flights.

A. Well, you see, if I remember the flight, then I'll remember the -- you know, the contents (sic), some of it. But, you see, there was so many broken down flights taken that it's very hard to pinpoint and tell you which one is which one, even if you put it in front of my nose.

Burbank, Santa Monica. We could have flown out of Burbank, Santa Ana -- let's see. This could have been one -- had to do with promoting an item. I don't think so this is a Hart campaign, anything to do with Hart at all. I don't think -- because they flew a lot of times a lot to campaign -- not campaign, but promote a product, like a new tape or whatever it is. And they would fly around.

Q. Do you infer that from the hops that are

-- the different hops on this flight log?

A. Uh-huh, different video stores. As far as I know, they could have had Jane Fonda with that, you know, for promoting her videotapes.

Q. Do you recall, Mr. Kantzabedian, any flights to San Francisco that were related to the Hart campaign in advance of the flight that took you to the convention?

A. No, I can't recall any of those.

MR. BERNSTEIN: This, Mr. Reporter, is FEC Exhibit No. 12.

(The document referred to was marked Federal Election Committee Exhibit No. 12 for identification.)

BY MR. BERNSTEIN:

Q. This next one, Mr. Kantzabedian, is again a flight to San Francisco in July. And this is around the convention time. And I wonder if you can examine it and try to recollect this one.

A. Kenny Loggins; oh, okay. This -- nobody flew on this. This was a, again, celebrity thing, something that Stuart Karl sent for a celebrity, to take care of a friend, I believe. I just saw "Kenny Loggins." He flew on this.

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Q. Does this give you any better recollection of who Nathan East might have been?

A. Could have been with -- I don't know. I mean, this could be a good key for you because, you know, Kenny Loggins, I don't know if he had to do anything with Gary Hart campaign or anything like that, or if he showed up to sign a song. I really don't know.

All I could remember, I remember Kenny Loggins. We sent the plane for him. And after that, I don't remember. Nobody was on -- I mean, none of us was on the plane on this.

Q. Do you know if Stuart Karl was?

A. No, he wasn't.

Q. Okay.

MR. BERNSTEIN: That is FEC Exhibit No. 13.

(The document referred to was marked Federal Election Committee Exhibit No. 13 for identification.)

BY MR. BERNSTEIN:

Q. The next one, Mr. Kantzabedian, is a flight in October of '84. I wonder if you can recall this flight.

A. That's for Mr. Levon Helman. What is this?

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(Asides) Wasn't it an entertainer? Yes, I believe that's the entertainer. But -- here it is. Mr. Levon Helman. San Francisco. I believe this is one other flight -- or it could have been the same. Do you have the other one, the old one on Levon Helman? I just want to compare it to --

Q. No. This is the only flight with Levon Helman.

A. Oh, you gave me -- I'm sorry. You called me the name from --

Q. Kenny Loggins? Oh, no, no. I asked you the name earlier. You're right about that.

A. Yeah, that's where I was getting it. I thought we just read about it.

This is Levon Helman. This is the one that I did fly with him. He is the entertainer.

Q. Yeah.

A. He is --

Q. Can I ask you, in the invoice, which is the second page of this, it indicates an account number which is CL1240. Do you know what that means? Do you remember?

A. That's the -- I believe that's the airplane number, tail number. Let me see here. Is that a "C" or a "L"? CL1240?

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Q. So you think that's not a reference to a customer account number, but to --

A. No, no. I believe that's a -- the plane, the tail number. If I could find the plane number here, and I could show it to you. That's the plane that we flew. That's the actual aircraft number. As you could see on the second page where the invoices were, the other address you were asking me --

Q. Yes.

A. -- is 177-F Riverside Drive, Newport Beach, 92663.

Q. So your best recollection is that this was an entertainment-related trip?

A. Yeah, this was entertainment, as far as I could remember.

Q. Did Martin Aviation maintain an account number for these flights?

A. Account number, such as what?

Q. Did you or did Karl Home Video have an account number -- Strike that. Let me try again.

A. You mean like an open account?

Q. Yeah. Was there --

A. Like a credit card?

Q. Yes.

A. No. They used Stuart's card. I will give

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them over the phone. Or they have it in the record, or we give -- we check -- as you could see, in a lot of them it says payments due within fifteen days or sixteen days, or whatever. A lot of them we paid with check, cashier's check.

Q. This seems to reflect not a flight, Mr. Kantzabedian, but a payment. And the second page is a --

A. Stuart credit card?

Q. Yes.

A. Yeah. I would call it in a lot of times, phone call. Do you see, "Phone Order"? Sure. That's what they would have in the file.

Q. Can you tell us, was this --

A. That's a helicopter flight, $500.

Q. Was this Stuart Karl's personal credit card?

A. Yes.

Q. Please tell us again what you were starting to just a moment ago about where the payments came from for all of these flights?

A. The payments came from either personal check from Stuart Karl or, if he -- he sometimes would stick it in the company, whatever company car -- or, I mean, a company expense. And a lot of it, he paid

out of his credit card. So it was all mixed.

Q. Was this his personal credit card?

A. I believe it was. He didn't have a business credit card at that time.

Q. I think at this point I'd like to show you at least one more flight log, Mr. Kantzabedian, and then ask a couple more general questions.

MR. BERNSTEIN: We've now handed the reporter FEC Exhibit No. 15.

(The documents referred to were marked Federal Election Committee Exhibits Nos. 14 and 15 for identification.)

BY MR. BERNSTEIN:

Q. This is a flight that was in March of 1985, the following year, and it indicates that it was authorized by Rama, R-a-m-a, that the customer is Stuart Karl. So it's no longer reflected there Abraham Levon as the previous invoices were. Why was that?

A. I still don't -- Rama made those reservations? No, Rama made a lot of calls, too, as you saw on the previous ones, too. You missed one, when I was telling you. I said Rama made the phone call. Rama could make the call, but it says over here, "Due to Mr.

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Abraham, pick up Mr. Karl." So it's -- let's see, where is this coming from? Santa Monica? What is this? This is a helicopter. This is nothing. This is a helicopter. This is just pick up.

Q. Did there come a time, Mr. Kantzabedian, when you no longer ordered airplanes for Mr. Karl?

A. Pardon me?

Q. Did there come a time when you no longer ordered airplanes for Mr. Karl?

A. Yeah, when I quit, I no longer did it. When I was out of the company, that was it.

Q. These flight logs seem to indicate, Mr. Kantzabedian, that the name Abraham Levon on the invoices ceased after this period of time, which was in March of '85.

A. March of '85.

Q. My question is, do you recall sometime in advance of you quitting, that you stopped engaging in this activity for Mr. Karl?

A. Rama started -- Like I said, when we got into Lorimar Studios, Rama started -- I started taking care of a lot of other stuff and Rama started calling in a lot of it. So if she's called in this one -- you see, she called in -- okay. This is 1985? Okay. I believe, as far as I could recollect, they weren't there

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in 1985, at 16th Street, Karl Home Video.

Q. Why would the bill have been sent to that address, then?

A. I don't know. I mean, I could be wrong. But at 3-12-85, I believe they were in Lorimar at that time in Irvine. It could be an error on the behalf of Martin Aviation, thinking they're on the right address, because that's the old address, 899 West 16th Street.

But, anyway, this is a -- I had -- Whatever it is, I was there because my name is here.

(The document referred to was marked Federal Election Committee Exhibit No. 16 for identification.)

THE WITNESS: So I probably was on the flight with him because I -- it was a helicopter flight.

BY MR. BERNSTEIN:

Q. In instances where you did not order the airplane, would you -- were you aware of the transportation of Senator Hart?

A. No. The day that I stopped making reservations was the day that I cleaned my hands as far as, you know, having the headache of appointments or making reservations for planes or -- I pulled -- You know, now we're getting closer to the times that I was pulling

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away. So there is nothing in there that even if it's Rama White, that I would be aware of. If Rama White's name is on there, then not aware of it, other than if my name is mentioned.

MR. BERNSTEIN: Off the record for a minute.

(Discussion off the record.)

BY MR. BERNSTEIN:

Q. Mr. Kantzabedian, let me try once more to plumb your memory as best as you can about the instances where flights involved either the transportation of Gary Hart or Gary Hart related activities? Can you give it one more try, please?

A. I still don't understand. Gary Hart?

Q. We have not been terrifically successful in going through these invoices and identifying flights that you remember having involved Gary Hart or being campaign-related. And my question is that, apart from the invoices, please try to give us your best recollection.

A. The thing is that I don't remember. You know, I mean --

Q. Well, ou said you remembered that there was a flight to San Francisco to the convention.

A. Yes. But you are asking me to remember

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something that had nothing to do with the convention. You are asking me to remember all through this which one was made for Gary Hart or which one was related to it -- I mean, Doug Rosen or whatever. I don't remember. I mean, you know, this is a while back and I don't remember. Honestly, I don't.

I could go on back through it as we did together. I could tell you approximately which one is which one. But to tell you if it was conducted business on Gary Hart or any political stuff was discussed -- in the airplane, you both could be sitting right where you're sitting and I could be sitting where I'm at. I couldn't even hear you even if you discussed politics because of the muffle (phonetic) in the plane. You have to really sit close to each other, and we don't sit that close to each other on a plane.

Q. Well, were there instances where the destination was such that you were able to infer that this was not an ordinary place that Karl would go for his video business or for pleasure?

A. No. You can't say video business because every place that you go is a video business. I mean, anywhere that you're flying in the United States -- you could take a hick town to the biggest town -- and you could combine it to the video business. You know, I'm

not saying that, you know -- but what I'm saying, you could also go to that direction. I mean, most of the flights that we take -- taken when Doug Rosen was on -- you see, that's the thing. I don't know where -- you know, I wasn't keeping a tab on Gary Hart, where Gary Hart was going, you know, for me to know -- if I landed in Denver, Colorado, is Gary Hart in Colorado. Do you understand what I'm saying? So I really couldn't honestly -- and if you're telling us the truth, but nothing but the truth, without lying to you, saying, "Yes, I know," than versus, you know, telling you the truth -- the truth is I do not know. I don't remember.

If I do remember as time goes by, by all means, you know, I will tell you. But I went through this before, too. I sat down and I kicked my head, and I have the original files on this. I gave it to the FBI. And I went through every one of them trying to remember exactly which one was which one because I knew I was going to be questioned. And I knew that we going to come to this situation that somebody's going to say, "Okay, what's this for and what's that for?" But I just couldn't remember because there was so many of them and so many pleasure and business and this, a mixture, that you really had to keep a diary in order to find out where every one of this went to.

If all of this was two years ago or three years ago or a year from the time that it happened, I could understand. You know, I could remember.

Q. Do you have a recollection of what the role of Douglas Rosen's wife was?

A. Wife?

Q. His wife.

A. I never knew he was married. He had -- no, I don't think so he was married.

MR. BERNSTEIN: At this point, Celia, were there questions that you wanted to ask Mr. Kantzabedian?

MS. JACOBY: I want to just ask one question.

BY MS. JACOBY:

Q. Does Tetterboro, New Jersey have any particular significance in the video industry? Tetterboro, New Jersey.

A. Tetterboro, New Jersey. You mean, we're talking about the state?

Q. The town, that area.

A. The town of New Jersey.

Q. Any particular significance in that industry?

A. Yeah, it would. It probably would have had a reason for it. I mean, it's not a big town.

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Q. But it has no particular meaning to you?

A. Yeah. It's not a big town or anything like that, that -- New Jersey, New Jersey. No, it doesn't. Wherever there's a video store, wherever there's people. You know, the industry is such --

Q. Well, let's get back to that. When you say Karl would go out to little stores and try to market personally, he didn't have a marketing staff?

A. No. You see, when you're introducing the product, a lot of times -- okay -- he would take his people out there to educate. You know, like let's say, for example, you take -- you're talking about New Jersey, a little town. When people aren't educated about the product, you would take somebody down there. You would fly down there. And it was an honor for them, especially if it's a chain or a big distribution company. You see, they could probably have your merchandise, but you want to do a more public relation work with them. And you would send either your people, or if you happen to be in the neighborhood you stop by yourself. And sometimes you would take -- you would make a time and spend the money to go down there personally and meeting these people to pump them up so they would sell the product.

But as far as, you know -- but, you see, now, in between, you could put in a lot of stuff and

do a lot of things, and people wouldn't know, you know.

Q. I'm going to give you a copy of a news article from the Orange County Register, and you are indicated as having made several statements. And I would like to confirm whether you did or did not make those statements.

In the third column, the second full paragraph, it says -- and I'm reading that paragraph:

"'I'm the dirty laundry of the Hart campaign. I've kept quiet long enough. The truth needs to come out, Mr. Kantzabedian said.'"

A. Okay. Now, let's rephrase that. "I'm the dirty laundry of you," to Stuart Karl, not the dirty laundry of the Hart campaign.

You see, when I was talking to the interviewer, I said I was sick and tired of being everybody's dirty laundry, you know. I says, "I don't want" -- I says -- as I told them exactly what the -- I said, "Stuart, I'm just dirty underwear to you; anyday you're going to change me." So he picked that up and he turned the words around and made it into dirty laundry of -- I guess it sounds good to them. But no, I did not make it in that way. No.

Q. In what sense do you mean that you were the dirty laundry to Stuart Karl?

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A. Meaning that, "I'm sick and tired of you -- doing your dirty work," not in the sense of Hart or whatever. Taking care of his women, you know, staying up all night or keep getting bumped -- or beeped. Handling things that he wouldn't handle. Anything that had to do other than the work, to me, was considered something that I don't enjoy doing. If it had to relate with work that I enjoyed doing, by all means, that was what I was getting paid for. But what I wasn't getting paid for something that he was -- that had nothing to do with work. And his women weren't in my category of work.

Q. All right. Let's continue in that same paragraph. It reads:

"Rosen told Stuart how to raise the money and hide the money."

A. Okay. As we were discussing, too, as I told you, it's like somebody told me how -- what to do. Okay? And going through the stages. Same thing they told Stuart.

Q. All right. Now, you did make the statement?

A. No. My statement to him was that somebody had to tell. The closest person was to him -- was Doug Rosen.

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Q. All right. And in what sense would you have gained the information -- what circumstance would you have gained the information that Rosen was the likely person to --

A. Because Rosen always guided Stuart in the conversations, meaning that always talked, like, on the telephone. I was telling that same thing: "Did you take care of the employees?" "The employees are taken care of." I know he's talking to Rosen. You understand? I mean, I'm there and I hear it and hear her buzzing saying, "Doug Rosen is on the line." So that was the -- and the intentions was that way, but it wasn't meaning the way he wrote it down, like I for sure hundred percent, you know, heard both ends and -- no. All I was giving is a one-sided conversation, as I told everybody else.

Q. Okay. We have gone through a number of these flights. But in this next -- the final paragraph on this page and the beginning paragraph on the next page, it indicates that you were a passenger of five charted Lear jet flights when Mr. Rosen was ferried to campaign appointments. You said that Karl had paid $50,000 for these trips?

Is this an accurate statement of what you said?

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A. Okay. Now, I said -- when I told them I was on certain flights with Doug Rosen and Karl, when he was riding piggyback with us; okay? Now, that he paid $50,000 for those trips is an estimated amount. He asked me, "How much you think those trips would cost?" And I said to him, "Well, it costs fifty thousand bucks or more." I mean, it was, as you could see on the --

Q. All right. That's reasonable.

It further indicates that you described two specific flights, a flight to the Democratic Convention, which we spoke of --

A. Uh-huh.

Q. -- and also a round-flight trip (sic) from John Wayne to Washington, D.C. Do you recall those trips, any particulars about them?

A. Okay. Now, Washington, D.C., again, was the trip to the Congress.

Q. All right. Douglas Rosen was aboard that trip?

A. No, Doug wasn't aboard that trip. Our conversation, again, was with him that -- he asked me the flights that Doug Rosen -- then we talked. Then he says, "Well, what other places have you gone?" I said, "Well, we've gone to Washington, D.C.," but not the farthest distance that we've gone, because he had

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a copy of this, too, himself. So here I am trying to explain the flights. So I said, "Well, we went down to the campaign in San Francisco where Doug Rosen was present." Now, Doug Rosen flew a lot of times with us. I mean, I don't -- again, go back to the same circle -- remembering identically.

Q. All right. So you're saying that your conversation to this point has been misinterpreted by the reporter?

A. Some of it has been misinterpreted. I mean, what I understood from him, what I told him --

Q. Well, I want to understand clearly what statements you have and have not made to the reporters and whether they are not accurately reported here.

Again, we're going down that same column in the third paragraph. It says:

"No one would identify that name [being Abraham Levon] with the Hart campaign."

This is indicating that the purpose of using the name Abraham Levon was to --

A. No.

Q. -- conceal the originator --

A. No.

Q. -- and the person who has done --

A. You see, again, it is misinterpreted.

It's taken -- No one would have identified Abraham Levon if they were going looking for records; okay? It wasn't done intentionally to cover up Gary Hart because I was doing it prior to that. I was using my middle name because had a hard time pronouncing my last name, Kantzabedian. So I always used my middle name.

But, now, if they would have gone and researched, looking for Stuart Karl for this stuff, they wouldn't have found it because it's under Abraham Levon.

BY MR. BERNSTEIN:

Q. Are you suggesting it was for a lot of reasons, not only --

A. Yes, it was --

Q. -- relating to hide it from the Hart campaign?

A. The reason was to hide it from his company, to hide it from his wife. You know, of all the persons, forget everybody else, it's his wife.

BY MS. JACOBY:

Q. All right. Are you saying, then, that Stuart Karl made a habit and a pattern of trying to conceal -- Off the record.

(Off the record.)

BY MS. JACOBY:

Q. Are you saying to us that Mr. Stuart made

a pattern or a habit of concealing his financial dealings and the --

A. Yes.

Q. -- purpose of his expenditures?

A. It was a habit of him doing that. He wanted to keep everything confidential.

Q. And that would be consistent in this instance that he be trying to hide his political activities?

A. That, I don't know. Well, he probably would, yes.

Q. All right. Well, let's continue on down that same column. We've discussed that you did make a political contribution, both you and your wife, and you were reimbursed.

A. Yes.

Q. This paragraph, the fifth paragraph from the end of that column indicates that this occurred and that you were one of several -- numerous employees, obviously. It further says that you said the employee checks were collected by Mr. Karl and handed over to Rosen. How did you acquire information in that regard?

A. Okay. Again, it's misinterpreted. I said -- you know, the --

Q. Did you have that information, that the

checks were handed to Rosen?

A. Not directly, no, I didn't.

Q. Did you have any information indicating that they were handed to Rosen?

A. No. But that's indication meaning -- okay, as far as us -- our understanding that's where it went. But as far as physically --

Q. Okay. Well, where did you get the understanding that that's where they went?

A. Well, because of -- back to the thing, communication. You know, you're putting two and two together and you're adding it up.

Q. All right. Well, let's give -- tell us what the two and two are?

A. Well, you know, hearing Rosen saying on the telphone that, you know, "Are the employees taken care of" and everything and raising the financial and Rosen always being there on the campaign, like in Newport and whatever. So you would automatically assume that that's where it's going. I mean, him -- and he was being told that he was a financial fundraiser or -- for Hart campaign.

Q. Okay. In the final paragraph in that column, where it says, "I know Rosen knew [about] everything. I was there when Rosen had [the] conversations

with Karl. I handled the billing for campaign expenses."

A. Okay.

Q. What billings for campaign expenses would you have handled?

A. The only thing would have been like what you pointed out, the rental cars. Billing, to me, I meant like I get the vehicles, I write it and I hand it to Stuart. So if Stuart turned around and gave it to Rama or whatever he did with it, that's the -- I billed to Stuart.

Q. Okay. But you know that these were specifically expenses for the campaign?

A. Yeah.

BY MR. BERNSTEIN:

Q. What other expenses would you have been -- did you refer to when you said "campaign expenses"?

A. No. I meant -- you see, the thing is that the way he wrote it and the way I said it is completely different.

We talked about cars, and the way he put it down is like I've handled everything. The way he used the title "Ex-Hart Tied to Donation" (sic) or "Chief Executive Officer," I was never a chief executive. All -- that's what I'm saying, the words being turned here.

I said a lot of the stuff --

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BY MS. JACOBY:

Q. We can understand that some of this was misconstrued and certainly reads better in the press. However, what we're understanding from you is that the underlying facts are accurate representation here, that you did --

A. Okay. You're talking about handling the bills. Yeah, I did --

Q. -- acquire services for the Hart campaign and that you did funnel --

A. Okay. Now, let's get something straight in here. When you're saying "billing," you know, I billed -- I gave the bill to Stuart Karl. Now, what he did with it, that besides the -- you know, that's anything else. But, to me, that was an official billing.

Q. But there were services provided to the Committee, to the Hart campaign, through the corporation, Stuart Karl's company?

A. Yes.

Q. All right. Let's go on to the next column, the sixth and seventh paragraphs from the end, just below where those little squares are. It says that you confirmed that three methods were used t conceal money. This was basically the reimbursement of contributions, the payment of compaign expenses, and then the Home

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Video, using that to mask expenses.

A. Uh-huh.

Q. Wereyou aware of these methods being used?

A. No. Well, later on I -- you start putting understanding, like, for example, we discussed about the video never being done. You figure out, well, they wrote that as an expense but they never accomplished it. You know, I mean things like that.

Q. All right. Were you aware of a bill being sent from Karl Home Video to the campaign --

A. No.

Q. -- for any costs in that production?

A. No. The only reason I wasn't aware, because if there was a production, I would have seen the budget. I never saw a budget.

Q. So you never saw a bill going --

A. No.

Q. -- to the Committee at all?

A. No.

Q. And there would be no bill prepared without your having seen a budget originally?

A. Yes. I mean, you have to have seen a budget. Then you have to break it down for them to understand what you've done, where the money's going.

Q. When you do a budget and then do a bill,

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to any client, would there have been a line item indication of each service provided?

A. Yes, Ma'am. You would have, for example, ten sheets of paper and, depending on how thick the budget is -- first of all, you would have the story line, what the story is about. Second, you would have the budget broken down, producer, executive producer, director, whatever, on and on. And then in the third page, you will have the crew, the cast, whoever used, location, cars. But everything is broken down so you know where ever penny is going.

Q. All right. This is simply a hypothetical. Would Karl Home Video send a bill to a client which only said, "Media Production," with a $90,000 amount?

A. Without breaking it down?

Q. Without anything further. Would that, in your experience, happen?

A. No. No, because I know, hypothetically again, as a client, if I would receive a bill like that, I sure wouldn't take it, not -- you know, not until I know what I'm going to get for my money.

MS. JACOBY: Jonathan, do you have anything on that area to add?

BY MS. JACOBY:

Q. Let's go to the next column, about the

middle of it. It reads:

"The Hart people were telling Stuart they would make him an ambassador . . . ."

Do you recall that statement being made?

A. We -- I recall the statement being made out of Stuart's mouth.

Q. All right. Do you recall about when that was made, the time?

A. We heard it in the beginning of the campaign, but we thought it was a joke. I mean, we thought -- he kids a lot. He kids around a lot. But then he started really being serious about it, talking about it more. And not only to me, everybody else. Then I said to myself, you know, this is getting serious. He wasn't joking; he is serious about it.

Q. All right. Do you remember the further statement that Karl made: "I can't believe what it costs to become an ambassador"?

A. Yes, I remember that.

Q. Did he make that to you?

A. Well, he made it not directly to me. He made it in the air, like you're talking to yourself out loud.

Q. Was anyone else present at the time?

A. No. I was present there. And it was in

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the conference room. You know, I was sitting in the conference room when he said -- you know.

Q. Okay. Do you know what instigated him making that statement at the time?

A. I believe he was on a phone or, if I recall, got off a phone or something like that, and he made that -- he said actually -- he said that, that "I can't believe how much it costs" or what it's going to cost.

Q. Do you have any recollection of who he was speaking to on the phone?

A. No, Ma'am. It was to campaign people or something like that.

There was a time that he really got angry -- and you probably will ask me about that, so I'll wait.

Q. Go ahead. What time was he very angry and what caused his anger?

A. Well, they asked, you know, for additional money, and he got really frustrated. And he says, "I can't believe what the hell they" -- you know, he says, "I cannot understand what the 'blank' they're doing with the money that I'm giving them." You know, and he was frustrated, and he was being pressured. Now the role was changing. Here is this man, the cool guy on everything. Now he's beginning to be very hyper, very ner-

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vous, very angry, aggravated, pressured man.

Q. What kind of pressure did you determine?

A. Deadlines. By watching him, it was because the pressure that he pushed on us, is everything rush, rush, rush, rush, rush, like it had a deadline to go to. I mean, tomorrow he's got to pay or tomorrow he's got to do this. There was no peace and saying, okay, you know, next week or whatever.

So everybody else around him was under panic.

Q. Do you have any conception who was putting that pressure on him?

A. Well, everytime he'd get off the phone on a political -- you know, anything that had to do with politically, okay? If he was on the phone, let's say -- sometimes Gary Hart people used to call him. I don't know who or what, you know. All I could know is --

Q. How do you know they were Gary Hart people?

A. Well, all I know is after Stuart would hang up, he says, "I can't believe the audacity of these people." And I'd say, "Well, what do you mean?" He'll say, "Hart," you know, "campaign people." He says, "What, they're thick-face or something," you know, they don't understand.

Q. Okay. So you were present following some

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of these conversations. Were anyone else present?

A. Most of the time Stuart would say it is when after work sometimes when everybody would leave. We have a drink, you know. You know, a lot of the times I would go into the office. I would write down stuff that I'm going to be doing for him, and I just happened to be in the wrong place at the wrong time. You know, it's one of those freak things. Everytime that I was there -- a lot of the conversation, like ambassador and everything, I'm sure everybody else had heard that. You know, I'm not the only one.

I don't know if you noticed when you read that, a lot of anonymous -- I don't know if it's in this paper or another paper -- things were made verifying what I had said.

Q. That's true. Many people were not nearly as forthcoming as you.

MR. BERNSTEIN: Can I just interject one question?

BY MR. BERNSTEIN:

Q. In the quote that Celia just read where you said, "I remember one day after Stuart had counted all the money he gave, when he said, 'I can't believe what it costs to become an ambassador,'" did he relate to you how much money the total amounted to?

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A. No.

Q. Did you have any impression of how much money it amounted to?

A. Well, I could have figured it out, I mean, figure it by thinking that -- you know, the way he spends money, you know, crazy, that he probably committed himself into thousands and thousands of dollars. I could only give you a -- I could only assume how much, you know, in my mind.

BY MS. JACOBY:

Q. And you think these thousands of dollars were those three methods we talked about, disguising dollars --

A. Yes.

Q. -- in a video production, reimbursed contributions and provision of services such as the --

A. Yes.

Q. -- limosines and air transport?

A. Yes.

Q. Can you think of anything else that may have been provided to the Hart campaign within that?

A. I could think of a lot of things, but I don't think so.

Q. Well, you can think of them. Do you have grounds to believe that there were other methods of

assisting the campaign?

A. No. I -- not that I could recollect, no. I mean, these are things that you have other people saying the same thing, you know, that it's firm. The others aren't firm. You know, I mean, I could only --

Q. Did you ever discuss any of this with any of your co-workers at Karl Home Video or Karl-Lorimar?

A. Such as?

Q. Any of these comments by Stuart Karl or any of these methods of assisting the political campaign?

A. No, no. I'll tell you one thing off the record, if you -- Could we go off the record?

MR. BERNSTEIN: Yes. Okay.

(Discussion off the record.)

BY MS. JACOBY:

Q. Is there anything else that you can tell us relating to the flights or other services provided by Mr. Karl, directly or through his company, to the Hart campaign? I realize it's a very broad question.

A. Okay. I mean, do you want to get really specific about that?

Q. Specifics. If there's any details you can recall on the flight in which Mr. Rosen or anyone associated with Mr. Hart had participated, could you tell us about it?

A. I'd say there's an incident that, coming back from San Francisco --

BY MR. BERNSTEIN:

Q. Can you tell us when this took place?

A. Gary Hart campaign -- what's that word again?

Q. Convention?

A. Convention; thank you. Gary Hart convention, coming back from San Francisco. On the airplane we had Donna Rice, Doug Rosen, I, Stuart Karl, destination to John Wayne Airport. And from John Wayne Airport, we stopped there and Donna Rice and Doug Rosen sat on a helicopter and flew to Santa Monica.

Q. This would be the return flight, you had described earlier, am I correct, of a flight where you and Mr. Karl and Mr. Rosen had gone up to San Francisco for the convention; is that right?

A. Yeah, this would be the return flight to Newport Beach, John Wayne Airport.

BY MS. JACOBY:

Q. Are there any other details of other flights on which Mr. Rosen had piggybacked, that you recall?

A. You know, we had many flights and everything. But as far as piggyback, it was in and out.

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You know, I can't really specifically break it down and go into one certain -- or tell you how many times exactly. But there was -- yes, I mean, he's been on the plane with us.

Q. How was Mr. Rosen made aware that various flights were being taken to certain locales, that he was able to piggyback?

A. He would know -- I suppose he would know Stuart Karl's flying to a certain destination, and then he would tell Stuart, "Hey," you know, "since you're going," for example, "to San Francisco, why don't you stop in Burbank and pick me up?" I mean, hypothetically, you know, that's what it would be. So what's another little tour?

Q. Did Mr. Rosen ever call specifically and request the provision of flights for him?

A. Not to my knowledge, no.

MS. JACOBY: Jonathan, have you anything on this point?

(No audible response.)

MS. JACOBY: We have been discussing the Orange County Register article, and I would like to present that as Exhibit 17 of the FEC.

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(The document referred to was marked Federal Election Committee Exhibit No. 17 for identification.)

MS. JACOBY: Have you further questions on this article or anything else?

MR. BERNSTEIN: Yes.

BY MR. BERNSTEIN:

Q. Let me ask one more questions, Mr. Kantzabedian, about the rental cars that you described. I'm not certain -- Who did you lease these cars from?

A. I don't remember, seriously.

Q. Was it Hertz or Avis or --

A. I can't recall. I know one thing. One of them was from Beverly Hills, but I can't recall the name, who -- which --

Q. The rental car company was from Beverly Hills?

A. Yeah. Off of Wilshire and Santa Monica, around that area. But I can't recall the name.

Q. Was it one of the large ones?

A. Well, they're all -- every one of them that I ever rented from were large firms. Each one has a pretty big -- they're pretty big over here in California.

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MR. BERNSTEIN: Off the record for a minute.

(Discussion off the record.)

MR. BERNSTEIN: Back on the record.

Mr. Kantzabedian, at this point, we have no further questions to ask you. And, as I just explained off the record -- and let me repeat now -- the deposition is -- the requirement for you to appear at the deposition is a continuing one and there may be the necessity to recall you at a future date to ask you further questions. If there is, we will notify you and give you as much advance notice as possible.

In the meantime, you should understand that, as I indicated in the beginning, these investigations are confidential under our statute and it's important that you not discuss them with anyone.

In addition, you should also understand that you will have the opportunity to review this deposition after it is transcribed to ensure that it's accurate and to sign it before a notary public and to return it.

THE WITNESS: Will I get a copy of it?

MS. JACOBY: We haven't really any additional copies, I don't believe.

THE WITNESS: Because I -- you've got to realize again, I have nothing. This way, I can build

up my own files in case if I ever need an attorney, they don't -- save them the time of the depositions. I've got to act on behalf of myself, something to -- so I have --

MR. BERNSTEIN: Mr. Kantzabedian, let us discuss that at a later time; all right?

THE WITNESS: All right.

MR. BERNSTEIN: Celia, are there any other matters that we need to raise?

MS. JACOBY: Well, I think, again, we keep stressing this and we should re-stress it again. This is confidential, and it should be held in confidentiality until you are notified that the matter is closed or unless all parties involved have waived confidentiality, and that includes not only yourself but any other parties involved, as well as the Commission.

THE WITNESS: When you say "confidential," as in what we talked here today stays in here?

MS. JACOBY: It stays within the parameters of these walls.

THE WITNESS: What if the FBI questions me again, because I -- what I do then? I mean, this is just a question asking you.

MR. BERNSTEIN: Right. No. I mean, clearly, if you are questioned by another governmental entity

about your knowledge about these things, that's what is confidential. Our investigation is confidential.

THE WITNESS: Oh, so I didn't have a meeting with you guys.

MR. BERNSTEIN: Let me also say again, Mr. Kantzabedian, that we want to make every attempt, since you are not represented by counsel in the proceeding, to encourage you at every opportunity to ask us questions about the course of it, about your role in it. And please, please, please, you know, call us, you know, write us if any questions arise. You know, I want you to feel very -- you know, to call us easily because we want you to fully understand what your rights are in the proceeding. Okay?

THE WITNESS: Okay.

MR. BERNSTEIN: I think that's it. So we are now off the record.

(Whereupon, the deposition was concluded at 2:47 p.m.)

OFFICIAL SEAL
DARLIENE DOWLING
Notary Public California
ORANGE COUNTY
My Commission Expires Sept. 10, 1991

Subscribed and sworn to before me this 28th day of July, 1988.

Darliene Dowling
Notary Public

My Commission Expires Sept 10, 1991

Abraham L. Kantzabedian
ABRAHAM L. KANTZABEDIAN

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STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I, Harry Attmore, a Notary Public for the State of California, certify:

At the time and place therein set forth in the foregoing transcript, the witness, Abraham Hevon Kantzabedian was put on oath by me.

IN WITNESS WHEREOF, I have subscribed my name and affixed my seal this 11th day of April, 1988.

Harry Attmore

NOTARY PUBLIC IN AND FOR THE STATE OF CALIFORNIA

OFFICIAL SEAL
HARRY ATTMORE
NOTARY PUBLIC - CALIFORNIA
LOS ANGELES COUNTY
My Comm. Expires Nov. 6, 1989

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To The Witness

This proceeding is known as a deposition. The person transcribing the proceeding is a Certified Shorthand Reporter, who is also a Notary Public and has placed you under oath. During the course of this proceeding I, and perhaps other of the counsel present here today, will be asking you questions pertaining to this matter.

Although this proceeding is being held in an informal atmosphere, since you have been placed under oath, your testimony here today has the same force and effect and is subject to the same penalties as if you were testifying in a courtroom before a judge. Specifically, you are subject to the penalty of perjury. Perjury is defined as "willfully, and contrary to an oath administered, stating as true any material fact which one knows to be false." You are advised that an unqualified statement of that which you do not know to be true is equivalent to a statement of that which you know to be false.

If, at any time during the deposition, you feel that a question is ambiguous, that you are unable to understand a question, or you fail to hear the question for any reason whatsoever, please tell the person asking you the question. If you do not so indicate, it will be presumed that you have heard and have understood each question and that your answer to each question is based upon your complete and full understanding thereof. If, after a question has been posed to you, you have any question yourself relating to what has been inquired about,

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FEC Exh. 1

April 11, 1988; Los Angeles; MUR 2583

please tell the person who posed the question before you answer the question.

The reporter is only able to transcribe audible responses, so please do not nod your head, shake your head, or say "ahha, haah." Further, the reporter can usually record the words of only one person speaking at a time, so plese allow time for the questions to be completed before you respond. You will normally be allowed to finish each and every answer before a new question is posed.

At the conclusion of this deposition, the reporter will transcribe these proceedings into a booklet form, and you will have an opportunity to read that booklet and make any changes in your testimony that you feel are necessary. However, if you do make changes in your testimony, as it is given here today, I will be entitled to ask you why you made such changes. Because of that fact, it is important that all of your answers be full, complete and correct.

If I ask you about any conversations you have had in the past and you are unable to recall the exact words used in the conversation, you may state that you are unable to recall those exact words and then you may give me the gist or substance of any such conversation, to the best of your recollection. If you recall only part of a conversation or only part of an event, you are requested to give me your best recollection of those events or parts of conversation that you recall. If I ask you whether you have any information upon a particular subject, and you have

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overheard other persons conversing with each other regarding it or have seen correspondence or documentation regarding it, please tell me that you have such information and indicate the source, either a conversation or documentation or otherwise, from which you derived such knowledge. In answering, please do not be concerned with whether or not your answer is hearsay or concern yourself with any technical rules of evidence you think may preclude answering.

Our purpose here today is not to trap you or to trick you in any manner, but simply to ascertain and discover that information about the facts concerning this investigation that you have within your knowledge.

At the conclusion of this deposition, the attorneys present may, by agreement, stipulate that you sign the booklet containing your testimony in the presence of any notary public, rather than the reporter who is here today, taking and transcribing this deposition. If we do so agree, it will be upon the expressed understanding, and your promise, that you will, upon receipt of this deposition, promptly and as expeditiously as possible, read it, correct it if you feel necessary, and sign it in the presence of a notary public and return it to the office from which it was sent to you.

Do you understand everything that you have just read?

Yes PMC _____ No _____

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Do you have any questions pertaining to either the procedure or what is about to transpire, insofar as this deposition is concerned? If so, please ask them now of me.

Please indicate that you have read and understand all of the foregoing, by signing this document where indicated below.

Signature of Deponent

FEC Exhibit 1 to the deposition of Abraham Kantzabedian, taken on April 11, 1988.

2304353102

MAR 16 1984

Exhibit 2

FLIGHT LOG

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 546-4300

Date: 3-13/15-84 ACFT: 400TE

PIC: Cutler ✓ SIC: Amaden ✓

Sched. By: M/S Date: 3-9-84

AUTHORIZED BY: ABRAHAM CUSTOMER: ABRAHAM LEVON

ADDRESS:

QUOTE: 13,626.36 9.9 8 STBY 30 M/S WILL PAY PHONE: (W) 645-7053

AE BA MC CASH ~~CHECK~~ CREDIT PAID (H)

ITINERARY: SNA to DCA (8) 0600 DCA to ~~SNA~~ PUB (3) 0700 PUB to SNA (3) 1300

TO TO TO

PAX:

LEG NO.	1	2	3	4	5	6
TOW	18300	17000	15,300			
MGTOW	18300	18300	18,300			
C.G. LOCATION	19'10	376.5	376.2			
C.G. LIMITS	18-32%	375.9-387	376.6-AFT			

9.9	FLT. HOURS @ 1150	= 11385.0
2.8	WAIT HOURS @ 44	= 123.20
	MAX. WAITS @	=
1	RON'S @ 440	= 440.00
Cater	MISC @	= 135.00
6.08 cat	SUBTOTAL	=
1 pax	FED. TAX 5% 8%	= 955.86
	FLIGHT TOTAL	= 13,039.06

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED
			SNA							
1	4	3-13	DCA	46.2 ✓	50.6	0600	1030	4.4	04+30	4578
2	3	3-14	PUB	50.6	54.1	0900	1250	3.5	03+50	4100
3	"	3-14	SNA	54.1	56.1 ✓	1310	1518	2.0	02+08	2346
4									+	
5									+	
6									+	
					TRIP TOTALS			9.9	+	

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.	27250	2719.3	1849	27250	1904	1914
TRIP TIME	9.9	9.9	3	9.9	3	3
TOTAL TIME	2734.9	2729.2	1852	2734.9	1907	1917

AIRCRAFT CHECKED AND FOUND AIRWORTHY; PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature)

NOTES HAVE CATERING ONBOARD
DANISH / FRUIT / SANDWICH TRAY
FOR (10) M/S
TERRI'S VALLEY P.O. # 55445

Computer quote 10.0 hrs.

- DEPART AT 0600 -

MULIT J-78 CRW

800 1 6 33/29 03/11

F4B1 IRF

C-P #1 RMI TW
nosewheel steer

FEC EX. #2
MUR 2583
Los Angeles, CA (HA)
4/11/88

EASTMAN, INC.

MartinAviation, Inc.

Please remit to:
Post Office Box 4511
Irvine, CA 92716-4511
Attention: Accounting

Invoice 8313

White copy — Customer
Yellow copy — Accounting
Pink copy — Billing Office

Sold To ABRAHAM LEVON Customer's Order No. _____ Date March 20 19 84

Address 280 Cagney Lane Unit 101 Cash _____ Charge _____

City & State Newport Beach Ca 92663 Terms Net due within 15 days

Date	Description		Net
3/13-14	Charter Flight		
	400JE - Lear 35		
	SNA/DCA/PUB/SNA		
	9.9 flight hours at $1150.00	$11,385.00	
	2.8 wait hours at $44.00	$ 123.20	
	1 Overnight at $440.00	$ 440.00	
	Catering	$ 135.00	
	Federal tax	$ 955.80	
	Flight Total		~~$13,039~~

Received By

19331 Airport Way South Santa Ana, California 92707 714/546-4300

103026

FROM ORDER# 1187

ABRAHAM LEVON
UNIT 101
280 CAGNEY LANE
NEWPORT BEACH,CA 92663

ABRAHAM LEVON
UNIT 101
280 CAGNEY LANE
NEWPORT BEACH,CA 92663

PAGE 1

CL1240

03/14/84 NET 15 04/01/84

9.9	9.9	SNA/DCA/PUB/SNA	1150.00	11385.00
2.8	2.8	WAIT HOURS	44.00	123.20
1	1	OVERNIGHT EXPENSES	280.00	280.00
1	1	OVERNIGHT EXPENSES	160.00	160.00
1	1	CATERING	135.00	135.00
1	1	FEDERAL TRANSP. TAX	955.86	955.86

9304353 LO5

13039.06

18 CW

LR35 ~~#0TJ5~~ EXHIBIT 3 APR 18 1530 Rosenstein 8100 202 485 1

11-01

Date: TUE 4/10-11/84 ACFT ~~35A~~ 400 ✓

PIC: CAILE ✓ SIC: ASSIST ✓

Sched By: JK Date: 4/5/84

Rental

FLIGHT LOG

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 546-4300

400

AUTHORIZED BY: A.L. CUSTOMER: ABRAHAM LEVON -- C

ADDRESS:

QUOTE: PHONE: (W) 645-7053

AE BA MC CASH CHECK (CREDIT) PAID 4/4 DCA 3 (H)

ITINERARY: SNA TO DEN (5) ~~LGB~~ RON 11 Dec (1) TO ~~SNA~~ DEN (2) RON TO DCA (5) TO SNA (5) TO

PAX: MR KARL + 4

LEG NO.	1	2	3	4	5	6
TOW	15.9	15.7	16.5	16		
MGTOW	18.3	18.3	18.3	18.3		
C.G. LOCATION	375.7	375.7	375.6	375.6		
C.G. LIMITS	3748-3870	3748-3870	3747-3870	3747-3870		

(10.3) FLT. HOURS @ 10.4 1150 = 11960.00

WAIT HOURS @ =

MAX. WAITS @ =

2 RON'S @ 440 = 880.00

MISC @ = 208.13

SUBTOTAL = 13048.13

FED. TAX 5% 8% = 1027.20

FLIGHT TOTAL = 14075.33

2 RON 13.7

LEG NO.	PAX	DATE	DEPT SNA	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
1	5	4-10	DEN	112.7	114.4	~~1524~~ ~~1500~~	1524	1.7	2+00	2016	MH4 T ~~D~~ PRC J-10 R ~~CIRC~~	31	01+54	4000
2	3	04-11	DCA	114.4	117.5	0530	0640	3.1	3+10	3300	DEN J-80 MKE J-24 CMH	41	03+00	5100
3	4	04-12	DEN	117.5	121.0	1102	1503	3.5	3+41	4583				
4	6	"	SNA	121.0	123.0	1530	1743	2.0	2+13	2626				
5									+					
6									+					
						TRIP TOTALS		10.3	+					

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.	2781.7 2790.3	27850	1815	2790.3	1950	1964
TRIP TIME	10.3	10.3	4	10.3	4	4
TOTAL TIME	~~2802.0~~ 2800.6	276.3	~~1819~~ 1819	2800.6	1954	1968

AIRCRAFT CHECKED AND FOUND AIRWORTHY. PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature)

NOTES: Req XC. 2 IND TMY 6

TERRI'S GALLEY PO # 52070

5 0 60 41 SE 16/13

FEC NUR 2583 Ex. 3 4/11/88 Rogers

(VH)

INVOICE NO

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

FROM ORDER# 1629

SOLD TO
ABRAHAM LEVON
UNIT 101
280 CAGNEY LANE
NEWPORT BEACH, CA 92663

SHIP TO
ABRAHAM LEVON
UNIT 101
280 CAGNEY LANE
NEWPORT BEACH, CA 92663

ACCOUNT NO	SLMAN NO	PURCHASE ORDER NO	DEPT	COLL	PPD	DATE SHIP'D	TERMS	INVOICE DATE	PAG

QUANTITY	ITEM NO	DESCRIPTION	UNIT PRICE	DISC %	EXTENDED PRICE
10.4		SNA/DEN/DCA/DEN/SNA	1150.00		11960.00
2		OVERNIGHT EXPENSES	160.00		320.00
1		FEDERAL TAX	1027.20		1027.20

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

SALE AMOUNT	14075.33
MISC. CHARGES SALES TAX FREIGHT	
TOTAL	14075.33

19

EXHIBIT 4

APR 18 1984

FLIGHT LOG

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 546-4300

Date: THURS 4/12/84 ACFT: 2183Y

PIC: SIC:

Sched. By: JK Date: 4/4/84

AUTHORIZED BY: RAMA CUSTOMER: ~~CARL~~'s ~~HUGO~~ Abraham Levon. C

ADDRESS:

QUOTE: ACTUAL PHONE: (W) 645-7053

(H)

AE BA MC CASH CHECK (CREDIT) PAID AIR RESEARCH

ITINERARY: SNA TO LAX (D) 1530 LAX TO SMO (D) 1630 SMO TO SNA (D) DROP

TO TO TO

PAX: DOUG ROSEN

LEG NO.	1	2	3	4	5	6
TOW						
MGTOW						
C.G. LOCATION						
C.G. LIMITS						

2.0 FLT. HOURS @ 395 = 790.00

WAIT HOURS @ =

MAX. WAITS @ =

RON'S @ =

MISC @ =

SUBTOTAL =

FED. TAX 5% 8% =

FLIGHT TOTAL = 790.00

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
1	3	CM/12		~~4529~~	454.9	✓		2.0	+					
2				✓ ~~4532.8~~	~~4547.8~~	✓			+					
3									+					
4									+					
5									+					
6									+					
					TRIP TOTALS				+					

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.	666.6	✓				
TRIP TIME	2.0	✓				
TOTAL TIME	668.6	✓				

AIRCRAFT CHECKED AND FOUND AIRWORTHY, PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature)

NOTES: P/U DOUG ROSEN AT AIR RESEARCH - HARWING

1630 400 JC.

(CANCEL DENVER

FEC MUR 4/11/88 EX 258.3 Los Angeles #4

INVOICE NO.

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

SOLD TO
ABRAHAM LEVON
UNIT 101
200 CAGNEY LANE
NEWPORT BEACH, CA

SHIP TO
ABRAHAM LEVON
UNIT 101
200 CAGNEY LANE
NEWPORT BEACH, CA

ACCOUNT NO.	SLMAN NO.	PURCHASE ORDER NO.	DEPT.	COLL.	PPD.	DATE SHIP'D	TERMS	INVOICE DATE	PAG.

QUANTITY	ITEM NO.	DESCRIPTION	UNIT PRICE	DISC. %	EXTENDED PRICE
2		SNA/LAX/SMO/SNA	395.00		790.00

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

SALE AMOUNT	790.00
MISC. CHARGES SALES TAX FREIGHT	
TOTAL	790.00

BILLING OFFICE

24 Ch

3043553 EXHIBIT 5 MAY 10 1994

FLIGHT LOG

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 546-4300

Date: 5-6-84 ACFT: 690R L
PIC: McLAURIN SIC:
Sched. By: Jan Date: 5-5-84

AUTHORIZED BY: CUSTOMER Abraham Lewor C
ADDRESS: PHONE: (W)
QUOTE: (H)

AE BA MC CASH CHECK (CREDIT) PAID

ITINERARY: SNA TO PSP 1300 PSP TO SAN 1435 SAN TO SNA 1 HR. STANDAIRD
TO TO TO

PAX: Harold Wilfurg

LEG NO.	1	2	3	4	5	6
TOW	6000	6000	5720			
MGTOW	6000	6000	6000			
C.G. LOCATION	163	161	161			
C.G. LIMITS	157.7-166.8	157.7-166.8	157.7-166.8			

1.6	FLT. HOURS @ 290	= 464.00
3.9	WAIT HOURS @ 22	= 85.80
	MAX. WAITS @	=
	RON'S @	=
	MISC @	=
	SUBTOTAL	=
	FED. TAX 5% 8%	=
	FLIGHT TOTAL	= 549.80

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
			SNA											
1	0	5/6	PSP	~~4463~~ ~~5440~~	446.6	1300	1335	.5	0+35		SNA - PSP	1.5	0+25	174
2	1	5/6	SAN	446.8	~~4471~~ 447.1	1400	1435	.6	0+35		PSP - SAN	6.5	0+20	150
3	1	5/6	SNA	~~4471~~ ~~5441~~	447.9	1855	1930	.5	0+35		SAN - SNA	6.5	0+20	130
4									+					
5									+					
6									+					
								TRIP TOTALS	1.6	205				

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.	534.9 ~~5441.6~~					
TRIP TIME	1.6					
TOTAL TIME	536.5 ~~5443.2~~					

AIRCRAFT CHECKED AND FOUND AIRWORTHY; PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED

Dave Laurin
PIC (Signature)

NOTES:
San Diego drop off

Abraham scheduled flight
his # 645-1780
(Above)

FEC EX. #5
MUR 2583
FEC EX #5
4/11/88

INVOICE NO

10.3735

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

FROM ORDER# 1977

SOLD TO
ABRAHAM LEVON
177F RIVERSIDE DRIVE
NEWPORT BEACH, CA 92663

SHIP TO
ABRAHAM LEVON
177F RIVERSIDE DRIVE
NEWPORT BEACH, CA 92663

ACCOUNT NO	SLMAN NO	PURCHASE ORDER NO	DEPT	COLL	PPD	DATE SHIP'D	TERMS	INVOICE DATE	PAGE
[illegible]		[illegible]				[illegible]	NET 10	[illegible]	

QUANTITY	ITEM NO	DESCRIPTION	UNIT PRICE	DISC %	EXTENDED PRICE
.6 1.5		SNA/PSP/SAN/SNA	290.00		464.00
.7 3.5		[illegible]	20.00		85.00

SALE AMOUNT	549.80
MISC. CHARGES SALES TAX FREIGHT	
TOTAL	549.80

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

28CX

Exhibit 6

Date: 5-11-12 ACFT: 237GA

PIC: _____ SIC: 9304353

Sched. By: _____ Date: _____

FLIGHT LOG

Martin Aviation Charter
1933 Airport Way South
Santa Ana, California 92707
(714) 546-4300

400

AUTHORIZED BY: _____ CUSTOMER: Lenora Levon (C)

ADDRESS: _____

QUOTE: _____ PHONE: (W) _____

AE BA MC CASH CHECK (CREDIT) PAID (H) _____

ITINERARY: TO _____ TO _____ TO _____

TO _____ TO _____ TO _____

PAX: _____

LEG NO.	1	2	3	4	5	6
TOW						
MGTOW						
C.G. LOCATION						
C.G. LIMITS						

	FLT. HOURS @ _____	=
	WAIT HOURS @ _____	=
	MAX. WAITS @ _____	=
1	RON'S @ 440.00	= 440.00
	MISC @ _____	=
	SUBTOTAL	= 440
	FED. TAX 5% 8%	= 35.20
	FLIGHT TOTAL	= 475.20

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
1									+					
2									+					
3									+					
4									+					
5									+					
6									+					
						TRIP TOTALS			+					

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.						
TRIP TIME						
TOTAL TIME						

AIRCRAFT CHECKED AND FOUND AIRWORTHY; PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

_____

PIC (Signature)

NOTES: Invoiced at 1 of 2 FLGS (6pgs)

FEC MUR EX. #6 4/11/88 2583 Los Angeles (AA)

FLIGHT LOG

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 546-4300

Date: FEB 5/11/84 ACFT: 237 GA ✓
PIC: Callaz ✓ SIC: Amsden ✓
Sched. By: JK Date: 5/10/84

AUTHORIZED BY: ABRAHAM CUSTOMER: KARL'S VIDEO
ADDRESS: ON FILE A. Saxon
QUOTE: PHONE: (W) 645-7053
(H)

AE BA MC CASH CHECK **CREDIT** PAID

ITINERARY: SNA TO SAF ⊗ 1200 SAF TO SNA ⊗ TO ○
TO ○ TO ○ TO ○

PAX: KARL PARTY

LEG NO.	1	2	3	4	5	6
TOW	16.5	15.2				
MGTOW	18.3	17.8				
C.G. LOCATION	377	372				
C.G. LIMITS	375.3 357.0	374.4 - 357.0				

(31) FLT. .32 HOURS @ 118.50 = 3680.50
18 WAIT HOURS @ 41 = 123.20
MAX. WAITS @ = 3803.70
RON'S @ =
MISC @ =
SUBTOTAL =
FED. TAX 5% 8% = 304.26
FLIGHT TOTAL = 4107.96

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
1	3	5-11	SAF	1715.6	1717.2	1200	1340	1.6	1+40	2044	MHH T J-78 ABQ	37	0120	4000
2	6	5-12	SNA	1717.2	1718.7	1710	1851	1.5	1+41	1870	ABQ J-78 TRM D	41	0140	
3									+					
4									+					
5									+					
6									+					
						TRIP TOTALS		3.1 ✓	+					

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.	2976.7	2976.7	2155	2747.1	1548	2056
TRIP TIME	3.1	3.1	2	3.1	2	2
TOTAL TIME	2979.8	2979.8	2160	2750.2	1600	2058

AIRCRAFT CHECKED AND FOUND AIRWORTHY; PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature)

NOTES: TERRI'S GALLEY 10th 54444
Ucom 122.7
POST ANN. Shasta 95 9825591
HILTON 9882311
ABQ out

104043

FROM ORDER# 2230

ABRAHAM LEVON
177F RIVERSIDE DRIVE
NEWPORT BEACH, CA 92663

ABRAHAM LEVON
177F RIVERSIDE DRIVE
NEWPORT BEACH, CA 92663

PAGE 1

CL1240 N237GA 05/12/84 NET 15 03/01/84

3.2	3.2	FLT HRS-SNA/SAF/SNA	1150.00	3680.00
2.8	2.8	WAIT HOURS	44.00	123.20
1	1	1 OVERNIGHT	280.00	280.00
1	1	OVERNIGHT EXPENSES	160.00	160.00
1	1	FEDERAL TAX	339.46	339.46

Flight Date: 5/11-5/12

9304353

4582.66

4582.66

2230

O R D E R

ABRAHAM LEVON
177F RIVERSIDE DRIVE
NEWPORT BEACH, CA 92663

ABRAHAM LEVON
177F RIVERSIDE DRIVE
NEWPORT BEACH, CA 92663

PAGE 1

CL1240 N237GA 05/12/84 NET 15 05/12/84

3.2	3.2	FLT HRS-SNA/SAF/SNA	1150.00	3680.00
2.8	2.8	WAIT HOURS	44.00	123.20
1	1	1 OVERNIGHT	280.00	280.00
1	1	OVERNIGHT EXPENSES	160.00	160.00
1	1	FEDERAL TAX	339.46	339.46

5/11 - 5/12

9304353

4582.66

INVOICE N
104043

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

From Order #2230

SOLD TO
Abraham Levon
177F Riverside Drive
Newport Beach, Ca. 92663

SHIP TO
Abraham Levon
177F Riverside Drive
Newport Beach, Ca. 92663

ACCOUNT NO	SLMAN NO.	PURCHASE ORDER NO.	DEPT.	COLL.	PPD.	DATE SHIP'D	TERMS	INVOICE DATE
CL1240		[illegible]				[illegible]	[illegible]	[illegible]

QUANTITY	ITEM NO.	DESCRIPTION	UNIT PRICE	DISC %	EXTENDED PRICE
3.2		Flt Hrs - [illegible]	$1,100.00		$3,[illegible]
2.8		Wait Hours	44.00		123.20
1		Overnight	280.00		280.00
1		Overnight Expenses	160.00		160.00
1		Federal Tax	339.46		339.46
		Flight Date: 5/11-5/12			

SALE AMOUNT	$4,582.66
MISC. CHARGES SALES TAX FREIGHT	
TOTAL	$4,582.66

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

EASTMAN, INC.

MartinAviation, Inc.

Please remit to:
Post Office Box 4511
Irvine, CA 92716-4511
Attention: Accounting

Invoice 2493

White copy — Customer
Yellow copy — Accounting
Pink copy — Billing Office

Sold To Abraham Levon Customer's Order No. _____ Date 5-20 19

Address 177F Riverside Drvve Cash _____ Charge _____

City & State Newport Beach, CA. 92663 Terms _____

Date	Description			Net
	---STATEMENT---			
5-6	N6902L	PSP-SAN	849.20	
5-9	N33595	SMO	569.10	
5-10	N33595	SMO	557.28	
5-11/12	N237GA	Santa Fe	4582.66	
5-14	N124EZ	BZN	4893.48	
5-18	N40898	SMO	975.80	
	Amount Due Through 5-20-84			11547.82
	(Please feel free to round off the cents, Abraham)			
	Cathy			

Received By

Exhibit - 7 MAY 2 3 1984

FLIGHT LOG

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 546-4300

Date: 5-18-84 ACFT N6558 4355

PIC: KG ✓ SIC: Ø

Sched. By: RS Date: 5-17-84

AUTHORIZED BY: ABRAHAM CUSTOMER: ABRAHAM Lewis Co

ADDRESS:

QUOTE: PHONE: (W) 645-7053

AE BA MC CASH CHECK (CREDIT) PAID (H)

ITINERARY: ~~SNA~~ TO SMO (+1) 1130 SMO TO SNA (+1) 1600 TO

TO TO TO

PAX:

LEG NO.	1	2	3	4	5	6
TOW	6828	6753				
MGTOW	7000	7000				
C.G. LOCATION	129.3	129.4				
C.G. LIMITS	125.0 - 135.0	124.7 - 135.0				

1.0	FLT. HOURS @ 350	= 350.00
2.1	WAIT HOURS @ 22	= 46.20
	MAX. WAITS @	=
	RON'S @	=
	MISC @	=
	SUBTOTAL	= 396.20
	FED. TAX 5% 8%	= 19.80
	FLIGHT TOTAL	= 375.50

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
			SNA											
1	5	5/18	SMO	653.5 ~~653.0~~	653.2	1245	1309	.2	0+24		~~D~~ LAX ~~D~~	~~4~~500	.3	
2	5	5/18	SNA	653.5	653.8	1510	1537	.3	0+27		~~D~~ LAX ~~D~~	3500	.3	2+0
3					655.3				+					
4									+					
5									+					
6									+					
					TRIP TOTALS			.5	+					

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.	653.0					
TRIP TIME	.8					
TOTAL TIME	653.8					

AIRCRAFT CHECKED AND FOUND AIRWORTHY: PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED

Kenneth Gear
PIC (Signature)

NOTES: MADE TRIP FROM SMO TO BUR & BACK TO SMO PER GARY HART (.3 ON HOBBS) DO NOT BILL CUSTOMER ABRAHAM
.5 + .3 = .8 total Hobbs FOR TODAY. (KG) 2777

30 UP

4/11/88 FEC EX. MUR 2583 Angeles #7

104044

FROM ORDER# 2277

ABRAHAM LEVON
177F RIVERSIDE DRIVE
NEWPORT BEACH, CA 92663

ABRAHAM LEVON
177F RIVERSIDE DRIVE
NEWPORT BEACH, CA 92663

PAGE 1

CL1240 N40898 05/18/84 NET 15 03/01/84

1	1	FLT HRS-SNA/SMO/SNA	320.00	320.00
2.1	2.1	WAIT HOURS	22.00	46.20
1	1	FEDERAL TAX	29.30	29.30

7304353

395.50

395.50

2277

O R D E R

ABRAHAM LEVON
177F RIVERSIDE DRIVE
NEWPORT BEACH, CA 92663

ABRAHAM LEVON
177F RIVERSIDE DRIVE
NEWPORT BEACH, CA 92663

PAGE 1

CL1240 N40898 05/18/84 NET 15 05/18/84

1	1	FLT HRS-SNA/SMO/SNA	320.00	320.00
2.1	2.1	WAIT HOURS	22.00	46.20
1	1	FEDERAL TAX	29.30	29.30

930435312

395.50

395.50

INVOICE N
104044

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

From Order #2077

SOLD TO
ABRAHAM LEVON
177F Riverside Drive
Newport Beach, Ca. 92663

SHIP TO
ABRAHAM LEVON
177F Riverside Drive
Newport Beach, Ca. 92663

ACCOUNT NO	SLMAN NO	PURCHASE ORDER NO	DEPT	COLL	PPD	DATE SHIP'D	TERMS	INVOICE DATE	PA
CL1240		[illegible]				[illegible]	NET 10	[illegible]	

QUANTITY	ITEM NO	DESCRIPTION	UNIT PRICE	DISC %	EXTENDED PRICE
1		Flt Hrs - SNA/[illegible]/SNA	$320.00		$320.00
2.1		Wait Hours	22.00		28.00
1		Federal Tax	20.30		20.30

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

SALE AMOUNT	$395.50
MISC. CHARGES SALES TAX FREIGHT	
TOTAL	$395.50

FLIGHT LOG

MA Nº 1070

Martin Aviation Charter
19331 [illegible] Way South
Santa Ana, California 92707
(714) 546-4300

Date: SAT 5/26/84 ACFT: 400 J6

PIC: Callaz SIC: Rodeo

Sched. By: MS Date: 5/24/84

AUTHORIZED BY: ABRAHAM CUSTOMER: KARLS VIDEO Abraham Lavin

ADDRESS: ON FILE

QUOTE: PHONE:(W) 645-7053

AE BA MC CASH CHECK (CREDIT) PAID (H)

ITINERARY: SNA TO SFO (3) 0800 SFO TO SNA (7) PM TO

TO TO TO

PAX: 3-Y

LEG NO.	1	2	3	4	5	6
TOW	15,200	15,200	14.3	14.3		
MGTOW	18,300	15,300	18,300	18,300		
C.G. LOCATION	3838	5555	375.1	375.1		
C.G. LIMITS	3738-3870	3755-3570	3738-3870	3738-3870		

2.1	FLT. HOURS @ 1150	= 3450.00
7.5	WAIT HOURS @ 44	= 343.36
	MAX. WAITS @	=
	RON'S @	=
	MISC @	=
	SUBTOTAL	= 3793.36
9.5	FED. TAX 5% 8%	= 303.46
	FLIGHT TOTAL	= 4096.82

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
1	3	5-26	SFO	180.8	181.9	0800 0903	0908 1011	1.1	1+08	1366	SNA SLI	35	0100	4000
2	4	5-26	PSP	181.9	182.9	1708	1823	1.0	01+15	1200	PSP FIL	37	0055	3500
3	3	5-26	LGB	182.9	183.4	1830	1900	.5	00+30	400	IFR			
4	1	5-26	SNA	183.4	183.7	1910	1940	.3	00+30	400	IFR			
5									+					
6									+					
							TRIP TOTALS	2.9	3+23	3366				

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.	25518	2851.7	4916	2857.0	2002	2016
TRIP TIME	2.9	2.9	4	2.9	4	4
TOTAL TIME	28637	2854.6	4950	2859.9	4006	4020

AIRCRAFT CHECKED AND FOUND AIRWORTHY; PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature)

NOTES: TOM'S calling 54462

FEL MUR EX 2588's Los Angeles 4/11/88 #8

Exhibit 8

INVOICE NO

134160

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

FROM ORDER#

SOLD TO
ABRAHAM LEVON
177F RIVERSIDE DRIVE
NEWPORT BEACH, CA 92663

SHIP TO
ABRAHAM LEVON
177F RIVERSIDE DRIVE
NEWPORT BEACH, CA 92663

ACCOUNT NO	SLMAN NO	PURCHASE ORDER NO	DEPT.	COLL	PPD	DATE SHIP'D	TERMS	INVOICE DATE
CL1240								

QUANTITY	ITEM NO	DESCRIPTION	UNIT PRICE	DISC %	EXTENDED PRICE
3		SNA/SFO/PSP/LGB/SNA	1150.00		3450.00
7.8		WAIT HOURS	44.00		343.20
1		FEDERAL TAX	303.46		303.46

SALE AMOUNT	4096.66
MISC. CHARGES	
SALES TAX	
FREIGHT	
TOTAL	4096.66

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

I Booked To SKYBIRD MAY 3 1 1984

FLIGHT LOG

MA № 1082

Exhibit 9

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 546-4300

Date: 5-26-84 ACFT: 1234DB

PIC: SIC:

Sched. By: M/S Date: 5-25-84

AUTHORIZED BY: ABRAHAM CUSTOMER: ABRAHAM LEWON

ADDRESS:

QUOTE: 11,394.00 PHONE: (W) 1-714-645-7053

AE BA MC CASH CHECK (CREDIT) PAID (H)

ITINERARY: JNY TO SNA (0) 0700 SNA TO LGB (1) 0830 LGB TO SFO (16) 0930
SFO TO SNA (5) 2130 SNA TO JNY (0) ETA 2245 TO ( )

PAX: Lewon + Abraham + wife

LEG NO.	1	2	3	4	5	6
TOW						
MGTOW						
C.G. LOCATION						
C.G. LIMITS						

FLT. 2.9 HOURS @ 3500	=	10150.00
WAIT HOURS @	=	400.00
MAX. WAITS @	=	
RON'S @ M/F	=	300.00
MISC @	=	
SUBTOTAL	=	
FED. TAX 5% 8%	=	844.00
FLIGHT TOTAL	=	11,694.00

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
1									+					
2									+					
3									+					
4									+					
5									+					
6									+					
			TRIP TOTALS						+					

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.						
TRIP TIME						
TOTAL TIME						

AIRCRAFT CHECKED AND FOUND AIRWORTHY; PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature)

NOTES: OUR PRICE FROM SKYBIRD
~~$9700.00~~ TOTAL 9000.00
OUR COST TO ABRAHAM
2.9 @ 3500 = 10,150.00
STBY 400.00
10,550.00
Okd M/S Tax 8% 844.00
11,394.00

FEC MUR EX. 2583 #9 Los Angeles 4/11/83 (HH)

INVOICE NO.

Martin Aviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

SOLD TO
ABRAHAM LEVON
177 Riverside Drive
Newport Beach, Ca. 92663

SHIP TO
ABRAHAM LEVON
177 F Riverside Drive
Newport Beach, Ca. 92663

ACCOUNT NO.	SLMAN NO.	PURCHASE ORDER NO.	DEPT.	COLL.	PPD.	DATE SHIP'D	TERMS	INVOICE DATE	PAGE
L1240		GI1204DB				5/20/84	NET 15	5/31/84	

QUANTITY	ITEM NO.	DESCRIPTION	UNIT PRICE	DISC %	EXTENDED PRICE
		Charter Flight			
2.9		Flt Hrs - VNY/SNA/LGB/SFO/SNA/VNY	$3,500.00		$10,150.00
		Wait Hrs.	400.00		400.00
		Overnight Expense	300.00		300.00
		Federal Tax	844.00		844.00

SALE AMOUNT	$11,694.00
MISC. CHARGES SALES TAX FREIGHT	
TOTAL	$11,694.00

Martin Aviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

ACCOUNTING

INVOICE NO

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

SOLD TO
ABRAHAM LEVON
Riverside Drive
Newport Beach, Ca. 92663

SHIP TO
ABRAHAM LEVON
F Riverside Drive
Newport Beach, Ca. 92663

COUNT NO	SLMAN NO	PURCHASE ORDER NO	DEPT.	COLL	PPD.	DATE SHIP'D	TERMS	INVOICE DATE	PAGE
							NET 10	5/31/84	

QUANTITY	ITEM NO.	DESCRIPTION	UNIT PRICE	DISC %	EXTENDED PRICE
		Charter Flts.			
2.9		Flt Hrs - VNY/SNA/LGB/SFO/SNA/VNY	$3,500.00		$10,150.00
		Wait Hrs.	100.00		100.00
		Overnight Expense	300.00		00.00
		Federal Tax	344.00		344.00

2304353126

[redacted]

SALE AMOUNT	$11,694.00
MISC. CHARGES SALES TAX FREIGHT	
TOTAL	$11,694.00

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

BILLING OFFICE

INVOICE NO.

104151

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

FROM ORDER# 2371

SOLD TO

ADRAHAM LEVON

177F RIVERSIDE DRIVE
NEWPORT BEACH, CA 92663

SHIP TO

ADRAHAM LEVON

177F RIVERSIDE DRIVE
NEWPORT BEACH, CA 92663

COUNT NO	SLMAN NO	PURCHASE ORDER NO.	DEPT.	COLL	PPD.	DATE SHIP'D	TERMS	INVOICE DATE	PAGE
								06/01/84	

QUANTITY	ITEM NO	DESCRIPTION	UNIT PRICE	DISC %	EXTENDED PRICE
1		CHARTER PER QUOTE	10374.00		10974.00
			720.00		720.00
0		VNY/SNA/LGB/SFO/SNA/	0.00		0.00
			0.00		0.00

23043531 2 1

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

SALE AMOUNT	11694.00
MISC. CHARGES SALES TAX FREIGHT	
TOTAL	11694.00

BILLING OFFICE

Exhibit 10

JUN 13 1984

FLIGHT LOG

MA Nº 1160

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 546-4300

Date: FRI 6/8/84 ACFT: 40898

PIC: R. Ruehle SIC:

Sched. By: JK Date: 6/7/84

AUTHORIZED BY: ABRAHAM LEVON CUSTOMER: (KARL'S HOME VIDEO) C

ADDRESS: ON FILE A. LEVON

QUOTE: PHONE: (W) 645-7053

(H)

AE BA MC CASH CHECK CREDIT PAID

ITINERARY: SNA TO SMO (1) 1545 SMO TO PSP (2) 1700 PSP TO SNA (3) DROP

TO TO TO

PAX: ABRAHAM + 1

LEG NO.	1	2	3	4	5	6
TOW	6549	6618	6288			
MGTOW	7000	7000	7000			
C.G. LOCATION	129.1	129.8	129.2			
C.G. LIMITS	123.7 / 135	124.1 / 135	122.4 / 135			

1.5	FLT. HOURS @ 320	=	480.00
2.3	WAIT HOURS @ 22	=	50.60
	MAX. WAITS @	=	
	RON'S @	=	
	MISC @	=	
	SUBTOTAL	=	530.60
	FED. TAX 5% 8%	=	42.45
21.00 ist.	FLIGHT TOTAL	=	573.05

LEG NO.	PAX	DATE	DEPT SNA	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
1	1	6-8	SMO	667.7	668.0	1900	1927	.3	0+27		VFR D→	2.5	.15	3:45
2	2	6-8	PSP	668.0	668.7	1900	1945	.7	0+45		VFR D→	7.5	:45	330
3	1	6-8	SNA	668.7	669.2	2000	2035	.5	0+35		VFR D→ VIA BANNING PASS	8.5	:35	2:45
4									+					
5									+					
6									+					
							TRIP TOTALS	1.5	1+42					

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.	664.9					
TRIP TIME	1.5					
TOTAL TIME	666.4					

AIRCRAFT CHECKED AND FOUND AIRWORTHY; PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

R. Ruehle

PIC (Signature)

NOTES: TERRI'S GALLEY P.O. 54472

FEC MUR 2583 Los Angeles 4/11/88 EX. #10

INVOICE NO.

105029

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

FROM ORDER# 2602

SOLD TO
ABRAHAM LEVON
177F RIVERSIDE DRIVE
NEWPORT BEACH, CA 92663

SHIP TO
ABRAHAM LEVON
177F RIVERSIDE DRIVE
NEWPORT BEACH, CA 92663

ACCOUNT NO	SLMAN NO	PURCHASE ORDER NO.	DEPT.	COLL	PPD.	DATE SHIP'D	TERMS	INVOICE DATE	PAGE
							NET 10		

QUANTITY	ITEM NO	DESCRIPTION	UNIT PRICE	DISC %	EXTENDED PRICE
.5 1.5		SNA/SMO/PSP/SNA	320.00		480.00
		WAIT HOURS	[illegible]		50.60
1		FEDERAL TAX	42.45		42.45

2304363 12 2

SALE AMOUNT	573.05
MISC. CHARGES SALES TAX FREIGHT	
TOTAL	573.05

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

BILLING OFFICE

Exhibit 11

JUL 2 0 1984

FLIGHT LOG

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 546-4300

488

Date: 6-22 ACFT: 7 3 1 4 3 5 3

PIC: SIC:

Sched. By: Date:

AUTHORIZED BY: CUSTOMER: A. Levon

ADDRESS:

QUOTE: PHONE: (W)

AE BA MC CASH CHECK CREDIT PAID (H)

ITINERARY: TO TO TO

TO TO TO

PAX:

LEG NO.	1	2	3	4	5	6
TOW						
MGTOW						
C.G. LOCATION						
C.G. LIMITS						

	FLT. HOURS @	=
	WAIT HOURS @	=
	MAX. WAITS @	=
	RON'S @	=
	MISC @	= 45.00
	SUBTOTAL	=
	FED. TAX 5% 8%	=
	FLIGHT TOTAL	= 45.00

expense for limo in SFO

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
1									+					
2									+					
3									+					
4									+					
5									+					
6									+					
							TRIP TOTALS		+					

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.						
TRIP TIME						
TOTAL TIME						

AIRCRAFT CHECKED AND FOUND AIRWORTHY; PRE-FLIGHT, ROUTE AND FLI-GHT PLANNING COMPLETED.

PIC (Signature)

NOTES:

MVR 4/11/88 FEC EX. #11 2583 Los Angeles

INVOICE NO

105350

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

FROM ORDER# 2000

SOLD TO
ABRAHAM LEVON
177F RIVERSIDE DRIVE
NEWPORT BEACH, CA 92663

SHIP TO
ABRAHAM LEVON
177F RIVERSIDE DRIVE
NEWPORT BEACH, CA 92663

ACCOUNT NO.	SLMAN NO.	PURCHASE ORDER NO.	DEPT.	COLL.	PPD.	DATE SHIP'D	TERMS	INVOICE DATE	PA

QUANTITY		ITEM NO.	DESCRIPTION	UNIT PRICE	DISC %	EXTENDED PRICE
1	1		CANCELLATION FEE	45.00	0	45.00

SALE AMOUNT	45.00
MISC. CHARGES SALES TAX FREIGHT	
TOTAL	45.00

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

BILLING OFFICE

Exhibit 12 JUN 1 1 1984

FLIGHT LOG

MA Nº ~~1114~~ 1102

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 546-4300

KATHY PAY RUN TO FLT CREW

Date: 6/6/84 ACFT: 107JM

PIC: Callaz SIC: Amsden

Sched. By: JK Date: 5/31/84

AUTHORIZED BY: ABRAHAM CUSTOMER: ~~KARL'S~~ Video

ADDRESS: ON FILE Abraham Levon

QUOTE: PHONE: (W) 645 7053

AE BA MC CASH CHECK CREDIT PAID (H)

ITINERARY: SNA TO SMO Ø 1600 SMO TO SFO ○ 1730 SFO TO SMO ○ 2200

TO ○ TO ○ TO ○

PAX:

LEG NO.	1	2	3	4	5	6
TOW	91	~~15,106~~ 15,106	15,000			
MGTOW		~~17,000~~ 17,000	17,000			
C.G. LOCATION		376	376			
C.G. LIMITS		373-387.0	373-387.0			

2.4	FLT. HOURS @ 1150	= 2760.00
	WAIT HOURS @	=
1	MAX. WAITS @ ~~352~~	= ~~352.00~~
	RON'S @	=
	MISC @	=
	SUBTOTAL 3112.00	= ~~3200.00~~
	FED. TAX 5% 8%	= 256.00
156.00 2025	FLIGHT TOTAL	= ~~3456.00~~ 3368.00

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
			SNA											
F 1	3	6-1	BUR	552.6	552.8	1600	1620	.2	00+15	500	VFR ~~D~~			
2	Ø	6-1	SMO	552.8	~~553.7~~ 552.9	1625	1635	~~.9~~ .1	00+10	425	~~D~~ SBA ~~D~~	~~35~~	~~0100~~	~~3500~~
3	7	6-1	SFO	552.9	553.8	1730	1830	.9	01+00	1400	~~D~~ SBA ~~D~~	35	0100	3500
4	7	6-1	BUR	553.8	554.8	2355	0000	1.0	01+05	1500	~~D~~ AVE ~~D~~ ~~INY D~~	37	0100	2500
F 5	Ø	6-2	SNA	554.8	555.0	0130	0145	.2	00+15	525	UNY D SNA			1500
6									+					
						TRIP TOTALS		2.4	+					

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.	20998	2019.6	1619	20998	1774	1909
TRIP TIME	2.4	2.4	5	2.4	5	5
TOTAL TIME	2002.2	2022.0	1624	2102.2	1779	1914

AIRCRAFT CHECKED AND FOUND AIRWORTHY: PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED

Chris Callaz

PIC (Signature)

NOTES: ~~Leg #1 ADMIN~~

+/- 11/88 MUR FEC Ex. #12 2583 Los Angeles (HA)

INVOICE NO

104237

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

FROM ORDER 3478

SOLD TO
ABRAHAM LEVON
177F RIVERSIDE DRIVE
NEWPORT BEACH, CA 92663

SHIP TO
ABRAHAM LEVON
177F RIVERSIDE DRIVE
NEWPORT BEACH, CA 92663

ACCOUNT NO	SLMAN NO	PURCHASE ORDER NO	DEPT	COLL	PPD	DATE SHIP'D	TERMS	INVOICE DATE	PAGE
CL1000		N187JM							

QUANTITY	ITEM NO	DESCRIPTION	UNIT PRICE	DISC %	EXTENDED PRICE
2.4 2.4		SNA/BUR/SMO/SFO/BUR/	1150.00		2760.00
		SNA			
1 1		1 MAX WAIT	352.00		352.00
		GENERAL CAT			
0 0		FLIGHT DATE: 6/1-6/2	0.00		0.00

SALE AMOUNT	3368.00
MISC. CHARGES SALES TAX FREIGHT	
TOTAL	3368.00

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

104992

FROM ORDER# 2569

ABRAHAM LEVON
177F RIVERSIDE DRIVE
NEWPORT BEACH, CA 92663

ABRAHAM LEVON
177F RIVERSIDE DRIVE
NEWPORT BEACH, CA 92663

PAGE 1

L1240 N107JM 06/02/84 NET 15 06/11/84

1		LOST INV - REF 104237	3112.00	3112.00
1		F.T.T.	256.00	256.00

9304335 3134

3368.00

3368.00

INVOICE NO.

105563

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

FROM ORDER# 2806

SOLD TO
ABRAHAM LEVON
177F RIVERSIDE DRIVE
NEWPORT BEACH, CA 92663

SHIP TO
ABRAHAM LEVON
177F RIVERSIDE DRIVE
NEWPORT BEACH, CA 92663

PAGE 1

ACCOUNT NO	SLMAN NO	PURCHASE ORDER NO.	DEPT.	COLL	PPD.	DATE SHIP'D	TERMS	INVOICE DATE	PAGE
L1240		N911DB				[illegible]	NET 10	[illegible]	

QUANTITY	ITEM NO.	DESCRIPTION	UNIT PRICE	DISC. %	EXTENDED PRICE
1		FLT HRS - SNA/SFO/SNA	4190.46		4190.46
1		[illegible]	285.60		285.60

SALE AMOUNT	4476.06
MISC. CHARGES SALES TAX FREIGHT	
TOTAL	4476.06

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

INVOICE NO.
[redacted]

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

PROM ORDER #2300

SOLD TO
ABRAHAM LEVON
177F Riverside Drive
Newport Beach, Ca 92663

SHIP TO

ACCOUNT NO	SLMAN NO	PURCHASE ORDER NO	DEPT	COLL	PPD	DATE SHIP'D	TERMS	INVOICE DATE	PAGE
[redacted]		[redacted]				[redacted]	[redacted]	[redacted]	

QUANTITY	ITEM NO	DESCRIPTION	UNIT PRICE	DISC %	EXTENDED PRICE
[redacted]					
3.1		Flight Hours S.M/CPG/S.M	$1100.00		$3701.00
1		Overnight	410.00		410.00
		Federal Exp	331.06		331.06
[redacted]					

SALE AMOUNT	$4476.06
MISC. CHARGES SALES TAX FREIGHT	
TOTAL	$4476.06

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

EXHIBIT 13

JUL 2 0 1984

7-1

FLIGHT LOG

MA № 1540

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 546-4300

Date: SAT 7/14/84 ACFT: 35NB

PIC: G BENSON SIC: C WEXELBERG

Sched. By: JR Date: 7/13/84

AUTHORIZED BY: ABRAHAM LEVON CUSTOMER: KARL'S HOME VIDEO

ADDRESS: ON FILE

QUOTE: ACTUAL PHONE: (W) 645-7053 (H)

AE BA MC CASH CHECK (CREDIT) PAID

ITINERARY: SNA TO VNY ① 1400 VNY TO SBA ③ 1425 SBA TO SFO ⑤ 1500-1530
SFO TO SNA ② 1630-1700 TO ○ TO ○

PAX: VNY NATHAN EAST + 2 SBA 3 + KENNY LOGGINS + 1

LEG NO.	1	2	3	4	5	6
TOW		15258	15561	14563		
MGTOW		15300	15300	16000		
C.G. LOCATION	91	375.1	379.3	388.4		
C.G. LIMITS		373.6-387.0	373.2-387.0	370.-387.3		

(2.3)	FLT. HOURS @ 2.4 1195	= 2868.00
2.2	WAIT HOURS @ 44	= 96.80
	MAX. WAITS @	=
	RON'S @	=
	MISC @	=
	SUBTOTAL	= 2964.80
13.84	FED. TAX 5% 8%	= 237.18
43.00	FLIGHT TOTAL	= 3201.98

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
			SNA											
1	Ø	7/14	VNY	1400	1418	1355	1420	0.3	0+25	459	IFR			
2	3	"	SBA	1526	1550	1520	1555	.4	+35	463	IFR			
3	5	"	SFO	1620	1657	1606	1700	.6	+54	1021	IFR			
4	2	"	SNA	1825	1926	1811	1929	1.0	1+01	1402	IFR			
5									+					
6								2.3	+					
						TRIP TOTALS		2.2	2+55	3365				

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.	2574.0	2246.9	1611	2091.5	1569	1677
TRIP TIME	2.3	2.3	4	2.3	4	4
TOTAL TIME	2396.2	2299.0	1648	2093.7	1573	1681

AIRCRAFT CHECKED AND FOUND AIRWORTHY; PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature) Guy Benson

NOTES: [redacted]

ABRAHAM LEVON (714) 760-7041

UNY - BEECH WEST

SBA - SANTA BARBARA AVIATION

PERRIER, SODA, DIET SODA, BEER

TERRI'S CALLCO ID# 54499

4/11/85 MUR FEC EX. # 13 2553 Los Angeles (HH)

INV
105

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

FROM ORDER # 2004

SOLD TO
ABRAHAM LEVOY
1777 Riverside Drive
Newport Beach, Ca 92663

SHIP TO

OUNT NO	SLMAN NO	PURCHASE ORDER NO	DEPT	COLL	PPD	DATE SHIP'D	TERMS	INVOICE DATE	PAGE
1214		[illegible]				7/11/84	Net 10	7/20/84	

QUANTITY	ITEM NO	DESCRIPTION	UNIT PRICE	DISC %	EXTENDED PRICE
2.4		Flight Hours /CHA [illegible]	1105.00		$2368.00
3.0		Make Ground	[illegible]		96.00
		Federal Tax	337.10		337.10

2304350

SALE AMOUNT	$3201.98
MISC. CHARGES SALES TAX FREIGHT	
TOTAL	$3201.98

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

EXHIBIT 14

FLIGHT LOG

MA № 1816

Martinaire Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 546-4300

Date: 10-4-84 ACFT: 3376A

PIC: [illegible] SIC: R. Pavlo

Sched. By: [illegible] Date:

AUTHORIZED BY: Abraham CUSTOMER: ~~Fort Hamm Linen~~ A. Levon

ADDRESS: On file PHONE:(W) (714) 645-7053

QUOTE:

AE BA MC CASH CHECK CREDIT PAID (H)

ITINERARY: SNA to STS 1630 STS to SMO 1700 SMO to LAX 1745
LAX to SFO SFO to STS STS to SNA

PAX: NOTE PAX on BILL: Mr. Levon Hellman Haffner

LEG NO.	1	2	3	4	5	6
TOW		13500		14336	14332	
MGTOW	91-	18300	91-	18300	18300	91-
C.G. LOCATION		379.4		377.8	374.2	
C.G. LIMITS		371.4-387.6		373.1-387.6	371.9-387.6	

(4.6) FLT. HOURS @ 4.7 1195 = 5616.50

3.4 WAIT HOURS @ 44 = 149.60

MAX. WAITS @ =

RON'S @ =

MISC @ =

SUBTOTAL 5766.10

FED. TAX 5% 8% = 461.29

FLIGHT TOTAL = 6227.39

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
			SNA											
1	0	10-4	STS	1885.1	1886.2	10:20	1140	1.1	1+20	1601	FR			
2	5	"	SMO	1886.2	1887.2	1245	1300	1.0	1+15	1420				
3	0	"	LAX	1887.2	1887.4	1315	1330	.2	+15	256				
4	5	"	SFO	1887.4	1888.3	1555	1715	.9	1+20	1345				
5	4	"	STS	1888.3	1888.5	1720	1750	.2	+30	467				
6	0	"	SNA	1888.5	1889.7	1800	1920	1.2	1+20	1655				
							TRIP TOTALS	4.6	6+05					

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.	3151.1	3151.1	2258	2521.5	1736	2186
TRIP TIME	4.6	4.6	6	4.6	6	6
TOTAL TIME	3155.7	3155.7	2264	2526.1	1742	2192

AIRCRAFT CHECKED AND FOUND AIRWORTHY; PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature)

NOTES:

FEC MUR EX #14 4/11/88
2583 Angeles, CA

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

INVOICE N

106127

FROM ORDER [illegible]

SOLD TO
ABRAHAM LEVON
177F RIVERSIDE DRIVE
NEWPORT BEACH, CA 92663

SHIP TO
ABRAHAM LEVON
177F RIVERSIDE DRIVE
NEWPORT BEACH, CA 92663

ACCOUNT NO	SLMAN NO.	PURCHASE ORDER NO.	DEPT.	COLL	PPD.	DATE SHIP'D	TERMS	INVOICE DATE	PA
[illegible]						[illegible]	NET 15	[illegible]	

QUANTITY		ITEM NO	DESCRIPTION	UNIT PRICE	DISC %	EXTENDED PRICE
4.7	4.7		FLIGHT HOURS	1195.00	0	5616.50
[illegible]	3.4		WAIT HOURS	44.00	0	149.60
1	1		FEDERAL TAX	461.29	0	461.29
0	0		SNA/STS, SMO/LAX	0.00	0	0.00
0	0		SFO/STS/SNA	0.00	0	0.00
0	0		AIRCRAFT: N330M	0.00	0	0.00
			MR. LEVON HELMAN	0.00	0	0.00

2 3 0 4 3 5

[redacted]

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

SALE AMOUNT	6827.39
MISC. CHARGES	
SALES TAX	
FREIGHT	
TOTAL	6827.39

BILLING OFFICE

58

Date: 9/27/84 ACFT: Lear 35 N435

PIC: SIC:

Sched. By: Date:

FLIGHT LOG

EXHIBIT 15

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 546-4300

401

AUTHORIZED BY: CUSTOMER: Levon

ADDRESS:

QUOTE: PHONE: (W)

AE BA MC CASH CHECK CREDIT PAID (H)

ITINERARY: TO TO TO

TO TO TO

PAX:

LEG NO	1	2	3	4	5	6
TOW						
MGTOW						
C.G. LOCATION						
C.G. LIMITS						

FLT. HOURS @ AX exchange 500.00

WAIT HOURS @ =

MAX. WAITS @ =

RON'S @ =

MISC @ =

SUBTOTAL =

FED. TAX 5% 8% =

FLIGHT TOTAL = 500.00

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
1									+					
2									+					
3									+					
4									+					
5									+					
6									+					
							TRIP TOTALS		+					

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.						
TRIP TIME						
TOTAL TIME						

AIRCRAFT CHECKED AND FOUND AIRWORTHY; PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature)

NOTES: surcharge on #950.00
AX Daymark to 1036

260

4/11/88 MUR FEC EX. #15
Los Angeles 25833
HH

930435 3142

3718-200655-1 11 -1 [illegible]

Cardmember Acct. No.

Stuart Karl

Cardmember

STORE NUMBER	DEPARTMENT NO.	SALES PERSON	REGISTER NO.	APPROVAL CODE

DEPT.	CLASS	QUAN.	ARTICLES	AT	AMOUNT

Service Establishment

Date of Charge

MARTIN AVIATION
SANTA ANA
5047504220 CA 092784

©Amex

Establishment agrees to transmit to American Express Travel Related Services Co., Inc. or Authorized Representative's Statement. Merchandise and/or service purchased on this card shall not be resold or returned for cash refund.

SHIP TO: NAME (PRINT)

ADDRESS APT. NO.

CITY STATE ZIP CODE

Sub Total

Taxes

Total

Cardmember Signature

X [signature]

Invoice Number

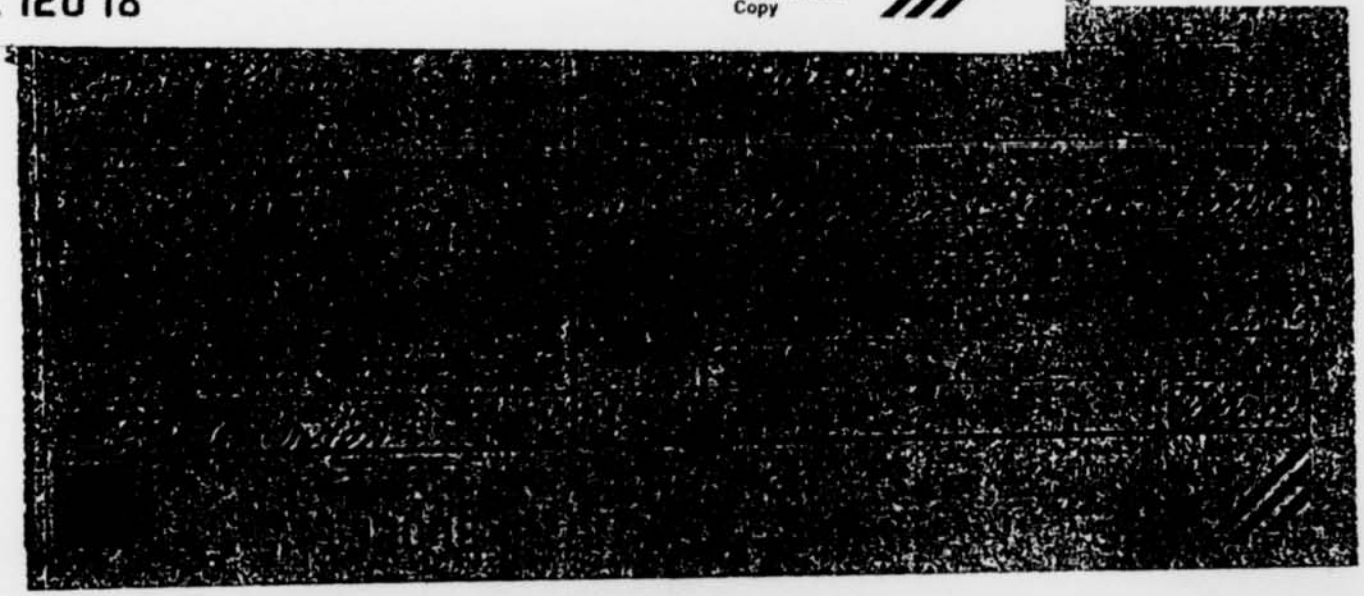
172078

Cardmember Copy

10000
AX Dpmt

Apply 9500 to
1036

AMERICAN EXPRESS® CARD PRTD. IN U.S.A. (4/84) 2223



INVOICE #

100060

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

FROM ORDER# 3583

SOLD TO: ABRAHAM LEVON
177F RIVERSIDE DRIVE
NEWPORT BEACH, CA 92663

SHIP TO: ABRAHAM LEVON
177F RIVERSIDE DRIVE
NEWPORT BEACH, CA 92663

PAGE 1

ACCOUNT NO.	SLMAN NO.	PURCHASE ORDER NO.	DEPT.	COLL.	PPD.	DATE SHIP'D	TERMS	INVOICE DATE
CL1040						09/27/84	NET 15	09/29/84

QUANTITY		ITEM NO.	DESCRIPTION	UNIT PRICE	DISC %	EXTENDED PRICE
1	1		AX SURCHARGE - 5%	500.00	0	500.00

2304513

SALE AMOUNT	500.00
MISC. CHARGES SALES TAX FREIGHT	
TOTAL	500.00

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

CUSTOMER'S COPY

INVOICE N

106068

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

FROM ORDER # 3503

SOLD TO
ABRAHAM LEVON
177F RIVERSIDE DRIVE
NEWPORT BEACH, CA 92663

SHIP TO
ABRAHAM LEVON
177F RIVERSIDE DRIVE
NEWPORT BEACH, CA 92663

ACCOUNT NO	SLMAN NO	PURCHASE ORDER NO.	DEPT.	COLL	PPD	DATE SHIP'D	TERMS	INVOICE DATE
11340							NET 15	

QUANTITY		ITEM NO.	DESCRIPTION	UNIT PRICE	DISC %	EXTENDED PRICE
1	1		AX SURCHARGE - 5%	500.00		500.00

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

SALE AMOUNT	500.00
MISC. CHARGES SALES TAX FREIGHT	
TOTAL	500.00

BILLING OFFICE

59 1/2

23043 Exhibit 165

MAR 15 1985

15

FLIGHT LOG

Nº MA 2371

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714)852-8300

Date: 3-12-85 ACFT: L-1 444CR

PIC: DD SIC:

Sched. By: JT/CF Date: 3-8-85

AUTHORIZED BY: KARL CUSTOMER: Stuart Karl

ADDRESS: On file.

QUOTE: PHONE:(W)

(H)

AE BA MC CASH CHECK **CREDIT** **PAID**

ITINERARY: P/U SNA TO SMO 1500 SMO TO SNA P/U

TO TO TO

TO TO TO

PAX:

LEG NO.	1	2	3	4	5	6
TOW						
MGTOW						
C.G. LOCATION						
C.G. LIMITS						

1.0	FLT. HOURS @ 595.00	= 595.00
	WAIT HOURS @	=
	MAX. WAITS @	=
	RON'S @	=
	MISC @	=
	SUBTOTAL	= 595.00
	FED. TAX 5% 8%	=
	FLIGHT TOTAL	= 595.00

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
1	1	3/13	SNA	1479.9	1480.9	1400	1615	1.0	+					
2									+					
3									+					
4									+					
5									+					
6									+					
					TRIP TOTALS			1.0	✓ +					

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.						
TRIP TIME	1.0					
TOTAL TIME						

AIRCRAFT CHECKED AND FOUND AIRWORTHY; PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature)

NOTES: D/O MR. ABRAHAM; P/U MR. KARL

4/11/85 MUR 2583 FEC Ex. 16 Los Angeles

INVOICE NO.

107304

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

FROM ORDER# 4737

SOLD TO
RAMA WHITE
899 WEST 16TH STREET
NEWPORT BEACH, CA 92660

SHIP TO
RAMA WHITE
899 WEST 16TH STREET
NEWPORT BEACH, CA 92660

PAGE 1

ACCOUNT NO	SLMAN NO	PURCHASE ORDER NO.	DEPT.	COLL	PPD.	DATE SHIP'D	TERMS	INVOICE DATE	PAGE
CL1240						03/12/85	NET 15	03/15/85	

QUANTITY		ITEM NO.	DESCRIPTION	UNIT PRICE	DISC. %	EXTENDED PRICE
1	1		FLIGHT HOURS	595.00	0	595.00
00	0		HELICOPTER FLIGHT	0.00	0	0.00
0	0		SNA/SMO/SNA	0.00	0	0.00
0	0		N444CR;LONG RANGER	0.00	0	0.00

SALE AMOUNT	595.00
MISC. CHARGES	
SALES TAX	
FREIGHT	
TOTAL	595.00

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

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Hart ex-aide tied to donation scheme

Karl assistant, others identify '84 fund chief

6297N

By Michael A. Lednovich, Jean O. Pasco and Larry Peterson
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Gary Hart's 1984 national finance director told Newport Beach millionaire Stuart Karl how to disguise illegal contributions to the Hart campaign and knew that those donations were being hidden from federal officials, say Karl's former chief assistant and three other sources familiar with the fund raising.

Douglas Rosen of Los Angeles began advising Karl, 34, in late 1983 on how to raise the funds and conceal them, said Abraham Kantzabedian, who worked closely with both men while employed at Karl Home Video from 1983 to mid-1985.

Rosen oversaw Hart's 1984 campaign effort that raised $9 million and was active in helping Hart find contributors in a continuing effort to pay off a $2.2 million '84 campaign debt that now stands at $1.1 million.

Although Rosen has held no official title with the candidate's 1988 effort, Hart officials said Rosen was one of Hart's active California supporters until he temporarily dropped out of the presidential race last May after revelations about his relationship with Miami model Donna Rice.

As Karl's right hand man at Karl Home Video, which eventually became Karl-Lorimar Home Video, Kantzabedian was the chief assistant in charge of finances and said he knew that Karl had arranged to funnel thousands of dollars of illegal contributions into Hart's 1984 effort.

"I'm the dirty laundry of the Hart campaign. I've kept quiet long enough. The truth needs to come out," Kantzabedian said in an interview with the Register on Tuesday. "Rosen told Stuart how to raise the money and hide the money. Stuart was pressured by the campaign to come through with the bucks."

Rosen, reached in Los Angeles, denied the allegations.

Kantzabedian said Karl was told by Rosen how to raise and disguise the funds. He said he personally delivered $5,000 in computer equipment from Karl for Hart's Los Angeles office and paid for three leased automobiles for Hart campaign workers. Rosen also helped disguise Hart campaign expenses paid by Karl into a company fund for a never-completed video about Hart, Kantzabedian said.

Kantzabedian also said he was a

B Please see KARL/12

> "I'm the dirty laundry of the Hart campaign. I've kept quiet long enough. The truth needs to come out. Rosen told Stuart how to raise the money and hide the money. Stuart was pressured by the campaign to come through with the bucks."
>
> **Abraham Kantzabedian**
> Chief financial assistant to Stuart Karl from 1983 to mid-1985

> "I've worked for Gary Hart for 15 years and we don't do that. I am not involved [illegible] is anyone else on the Hart campaign."
>
> **Douglas [illegible]**
> Gary Hart's 1984 national finance director

MORE →

ORANGE COUNTY REGISTER
JANUARY 29, 1988

FEC MUR 2553 Ex. #1-1 4/1/88 Los Angeles

EXHIBIT 17

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FROM 1

passenger on five chartered Learjet flights during 1983 and 1984 during which Rosen was ferried to Hart campaign appointments. Karl paid about $50,000 for those trips, Kantzabedian said. The trips included a flight to John Wayne Airport from the 1983 Democratic convention in San Francisco in July, and a $14,000 round-trip flight from John Wayne to Washington, DC, in May 1984.

Kantzabedian said he used his first and middle names — Abraham Levon — to bill the airplane charters on Karl's American Express card to conceal the trips.

"No one would identify that name with the Hart campaign," he said.

Hart's campaign reports for the period between July 1983 through July 1984, filed with the Federal Election Commission, do not list any in-kind contributions from Stuart Karl under "individual contributions." The records do indicate that Karl had contributed a total of $1,000 — the maximum allowed — as of Nov. 29, 1983.

Rosen called all the allegations "preposterous" and said he had no knowledge of any illegal fund raising on behalf of Hart.

"I've worked for Gary Hart for 15 years and we don't do that," he said. "I am not involved, nor is anyone else on the Hart campaign."

Rosen said Karl was a fund-raiser and "Whatever Stuart did, he did. I didn't know about it."

Karl has been unavailable for comment.

Rosen acknowledged that he had flown on Karl's Learjet during the 1984 campaign but said it was a common practice for members of Hart's executive finance council to hitch rides on charter flights.

"A lot of members of the executive finance council had chartered planes and it was nothing to piggyback with them if they were going in your direction," he said.

Rosen said he did not know if the trips were reported to the FEC.

Kantzabedian said he was among 15 Karl Home Video employees who made a total of $12,250 in bogus contributions to Hart's 1984 campaign. The employee checks, collected by Karl and handed over to Rosen, later were repaid to employees in cash by Karl, Kantzabedian said.

During one such employee solicitation at Karl's Newport Beach office in February 1984, Kantzabedian said Rosen and Karl discussed the employee donations.

"Rosen said to Karl in the office, 'How is this (the employees) to be handled,' meaning the cash repayment to employees," Kantzabedian said. "Stuart said to Rosen, 'Don't worry. Rama (White Middel) is already taking care of it.'"

Middel, at that time Karl's executive aide, has told the Register that she reimbursed $30,000 to employees from Karl's personal bank account for contributions made to Hart and two other congressional candidates.

"I know Rosen knew about everything. I was there when Rosen had the conversations with Karl. I handled the billing for campaign expenses. Stuart told me what to do and told me Rosen wanted him to do it that way," Kantzabedian said.

Kantzabedian recalled another incident, late in [redacted]'s unsuccessful bid to win the Democratic nomination, when the Hart campaign telephoned Karl with an urgent plea for $20,000.

"Stuart came out of his office and pounded his fist against the wall. He told me Rosen's people called saying they needed $20,000. It was a crisis and they had to have the money," Kantzabedian said. "Stuart was angry. He said 'What the (expletive) do they do with all that money I give them?'"

A source who attended several Hart campaign finance meetings also confirmed that Rosen and Karl had discussed illegal fund raising. The source said the discussions took place during four private meetings held between 1983 and 1986.

The source, who spoke on the condition of being unnamed, said the meetings involved Karl, Rosen and Hart campaign strategists.

The first meeting took place in August 1983, after Rosen had obtained Karl's name from a list of Democratic activists.

Doug told Stuart he needed his help with fund raising. Then he told us how we could check-swap (employees) and hide money," the source said. "We were reassured that everybody with Hart was doing it. Doug said other candidates had, and were doing it. There was no problem."

The source said methods discussed at the first meeting included:

■ Using employees of Karl's video company as contributors and then repaying workers in cash. The Register has disclosed that Hart received $17,000 in such contributions for his 1984 and 1988 campaigns.

■ Paying Hart's campaign expenses such as printing, materials, Learjet trips, limousines, rent-a-cars and parties and then listing the items as expenses of Karl Home Video.

■ Masking other Hart campaign contributions as being connected with a for-profit home video, "Gary Hart: The Candidate," that involved Karl and Rosen.

Kantzabedian confirmed that all three methods were used by Rosen and Karl to conceal the money.

"They always talked in a sort of code. Rosen always was very careful about what he said. But since I was handling the financial records, video budgets and travel schedules, I knew what they were talking about," he said. "And at the end of the day, Stuart and I would sit in his office and he would tell me everything that was going on. I couldn't believe it."

Rosen said he was living in New York in August 1983 and never attended any meetings with Karl before Jan. 4, 1984, when he was named Hart's finance manager.

"On that date I became involved in the Hart campaign," he said.

Rosen denied ever talking to Karl about hiding contributions.

"That's an absolute lie. I didn't know of any funds being hidden from federal officials," he said.

Susan Casey, Hart's campaign manager, could not be reached for comment.

"I don't really have any response at all right now," said Bernie Schneider, general counsel for the Hart campaign. "We will look into it."

Schneider said he knew nothing of the alleged activities.

"I remember a guy named Abraham (who worked for Karl)," he said. "I thought he was a driver."

Asked about how the allegations would reflect on the Hart campaign, Schneider said, "I don't know. I really don't have anything to say."

Schneider added, however, that he has begun questioning Doug and all the other people connected with this. He said he has had "two or three" conversations with Rosen since The Miami Herald first published an account last week about alleged Karl related campaign-finance irregularities.

"I'm trying to get to the bottom of the problem," he said. "That is all I have to say."

Kantzabedian said Karl had become enraptured with the glamour of Washington politics and the power of government after first meeting Academy Award-winning actress Jane Fonda, a political activist, and her husband, Tom Hayden, a Democratic state assemblyman in 1982.

Karl had made millions through marketing the Jane Fonda Workout and Playboy home videos. He had contracted with Rosen's Visual Eyes Company to do post-production on the projects. Rosen has since sold Visual Eyes and has no involvement with the firm, company officials said.

"The Hart people were telling Stuart they would make him an ambassador if Gary Hart was elected president," Kantzabedian said. "I remember one day, after Stuart had counted all the money he gave, he said 'I can't believe what it costs to become an ambassador somewhere.'"

Days after the August 1983 meeting, the source said there was a second fund-raising session in which Rosen brought along a "slew of Hart campaign people."

The source said the same topics were discussed between Rosen and Karl.

Rosen denied attending any meetings with Karl before 1984. When asked which Hart campaign people were dealing with Karl before 1984, Rosen said, "I don't know. I got Stuart's name off a (contributors') list."

Rosen said his involvement with Hart fund raising ended with the July 1984 Democratic Convention in San Francisco.

But Billy Shore, special assistant to Hart during the first 1988 campaign and a key '84 campaign insider, said that Rosen was one of the California people involved in helping find contributors to pay off $2.2 million in debts for the '84 effort.

Shore also said Rosen later became a supporter for the Hart 1988 effort until the incident with Rice resulted in Hart temporarily quitting the race.

Sources said two more conversations took place about Hart's financial problem after the convention.

One conversation on methods to raise money to repay '84 debts was conducted during festivities at the 1985 Kentucky Derby at Churchill Downs in which the Rosen family had entered a horse named "Chief's Crown."

The conversation took place, the source said, following a post-race party in which Rosen had entertained Hart and his wife, Lee, and

MORE →

Karl and his wife, Debra.

Again, the discussion focused on questionable fund raising. How to get the most out of Stuart and his friends without anyone knowing, the source said.

The source said Hart was not included in that discussion.

Rosen said Karl was his guest for the derby, but that no fund raising meeting took place.

"My horse lost; it was a post mortem," he said. "There were no meetings."

Kantzabedian said he left Karl-Lorimar Home Video in July 1985 because of the pressure exerted by Karl and Rosen in the fund raising efforts.

"I had a long talk with Stuart, friend-to-friend, and I told him something is wrong with all these contributions. I told him we're dealing with the government and that it was a heavy-duty game that I didn't want to play anymore," he said.

Kantzabedian said Karl shrugged his shoulders and told him, "I don't know what to say, all I know is that I've got to take care of it."

The Register previously has disclosed that Karl continued his fund raising for Hart and for the unsuccessful 1986 congressional races of Kathleen Kennedy Townsend of Baltimore and Orange County Superior Court Judge David Carter.

Although no longer the Hart finance manager, Rosen remained in fund raising, a former Karl-Lorimar executive said. Rosen and Karl again discussed disguised Hart campaign money in the fall of 1986.

That conversation between Rosen and Karl was during a Learjet flight from Tetterboro, N.J., to John Wayne Airport, according to the executive, who was on the airplane and overheard the discussion.

Rosen and Stuart were discussing the 1984 campaign debt on the way back to the coast, said the executive, who asked not to be named. "Stuart said to Rosen, 'Listen, I've hidden the (campaign) 84 contributions. Am I ever going to get my money back?'"

The executive said Rosen assured Karl that he would be repaid and said, "You've done a great job in fund raising. We look for more (financial) support from you."

The executive said Karl was concerned with his "sizable investment" in the Hart campaign.

Rosen said he was not involved with Hart in 1986, but then retracted the statement and said he might have held "a debt-retirement fund raiser in New York."

He said he was on Karl's chartered Learjet, but it involved private video business, not the Hart campaign.

Former Karl-Lorimar employees have told the Register that Rosen maintained a constant presence at the Karl Home Video office in Newport Beach and later at the Irvine office when the company became Karl-Lorimar in 1986. The business is defunct as of 1987.

Rosen was a regular in Stuart's office. Every couple of weeks he would spend a few days at Karl-Lorimar that focused on the Hart campaign, said another former Karl-Lorimar worker. "When Rosen telephoned the office, he had the same status as the president of Lorima — he was to be put right through to Stuart."

The Register disclosed last week that Karl employees had been pressured into giving a total of $12,250 to the 1984 campaign, and $4,500 in December 1986 in bogus contributions to Hart's 1988 campaign that were later were repaid in cash by Karl.

Rosen denied being active in the 1988 Hart effort before the Rice incident, but when told of Shore's statements, said, "I am participating ... putting some things together."

He would not specify his role.

Karl and Rosen also were active in a project called "the Gary Hart video." Publicly, they told workers the video was a private venture that would be marketed for sale at video stores. Karl and Rosen said the project did not involve the Hart campaign.

But Kantzabedian and one other source involved with Hart fund-raising said the video was another vehicle that Karl used to conceal funds to Hart's campaign.

The Hart video crumbled after The Miami Herald disclosed Hart's relationship with Rice.

"It was a means to channel cash to the Hart people without anyone checking," the source said. "If the Hart video was a private venture, the FEC people wouldn't even look at it. Of course, it wasn't private. It was directly involved with the Hart campaign."

A former Karl employee who arranged flights for Karl in 1986 and early 1987 said Rosen flew four times with Karl in August and September 1986.

The employee said he did not know what transpired on the flights, but said Rosen was known as a key member of Hart's campaign. Karl paid for all of the flights, said the employee, who asked not to be identified.

However, an executive who was on the majority of flights was told by Karl that Rosen was making the trips as "Gary Hart's public-relations man."

Another Karl employee familiar with the workings of the executive office confirmed that Rosen was introduced to the staff as a member of Hart's campaign. She said the constant topic between Karl and Rosen was how to pay off the debt from Hart's 1984 campaign.

Register staff writer Robin Goldstein in Washington contributed to this report.

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TRANSCRIPT OF PROCEEDINGS

ORIGINAL

UNITED STATES OF AMERICA

BEFORE THE

FEDERAL ELECTION COMMISSION

- -x
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IN THE MATTER OF: :
:
MUR 2583 :
:
- -x

CONFIDENTIAL

DEPOSITION OF GARY D. HUNT

C O N F I D E N T I A L

Los Angeles, California

Tuesday, April 12, 1988

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BEFORE THE

FEDERAL ELECTION COMMITTEE

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)
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) MUR 2583
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)

DEPOSITION UPON ORAL EXAMINATION OF

GARY D. HUNT

BE IT REMEMBERED that, pursuant to Notice of Deposition and on Monday, the Twelfth day of April 1988, commencing at the hour of 9:30 a.m. thereof, at the Federal Building, Room 7210, 300 North Los Angeles Street, Los Angles, California, before me, HARRY ATTMORE Notary Public in and for the County of Los Angles, State of California, personally appeared

GARY D. HUNT

called as a witness by the Federal Election Committee who, being by me first duly sworn, was thereupon examined and interrogated as hereinafter set forth.

oOo

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For the Federal Election Committee:

JONATHAN BERNSTEIN, Esq., and
CELIA JACOBY, Esq.
Federal Election Committee
999 "E" Street, N. W.
Washington, D. C. 20463

For the Deponent, Gary D. Hunt:

JEFFREY M. ETTINGER, Esq.
Vice President, General Counsel
COMAR
2030 East University Drive
Rancho Dominguez, California 90220

o0o

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Whereupon,

GARY DOUGLAS HUNT

called as a witness by the Federal Election Committee, being duly sworn by the Notary Public to tell the truth, the whole truth and nothing but the truth, testified as follows:

MR. BERNSTEIN: This morning we are here for a deposition of Mr. Gary Hunt in the course of a civil investigation being conducted by the Federal Election Commission, which is denominated Matter Under Review, or MUR 2583.

As I explained, prior to going on the record, the Commission has not at this point made findings against Mr. Hunt and he is at this point a non-Respondent witness in this investigation.

Furthermore, let me make clear that the investigations being conducted by the Federal Election Commission under Section 437 G 812 of the Federal Election Campaign Act are required to be kept confidential. And accordingly no notice of this investigation should be made public prior to the conclusion in the matter.

EXAMINATION

BY MR. BERNSTEIN:

Q Mr. Hunt, I wonder if you could state your full name, please?

A Gary Douglas Hunt.

Q And your home address and phone number?

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A Home address is [redacted]. Phone number is [redacted]

Q And your marital status, Mr. Hunt?

A Married.

Q Mr. Hunt, briefly, before we went on the record I handed you a three-page instruction, entitled: "To the Witness." And you signed the statement, Mr. Hunt. Did you read and understand it?

A Yes, I did.

Q Thank you.

MR. BERNSTEIN: At this point I'm going to hand it to the Reporter as Exhibit 1 for this desposition.

(The document referred to was marked Exhibit No. 1 for identification.)

BY MR. BERNSTEIN:

Q Mr. Hunt, please tell us about your education.

A I graduated from Texas University with a Bachelor of Business Administration in May of 1976.

Q And your current employment?

A I am President of COMAR Marketing Services, Incorporated.

Q And for how long have you been in that position?

A One year and one month.

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Q Can you tell us briefly what that business is involved in?

A Yes. That business is a mail and fulfillment center, in addition to being a marketing and creative services company. Basically we both consult to marketing companies predominantly and the theatrical business, motion picture industry, and home video industry.

We also do marketing collateral material, point of purchase stuff, display signs, and that kind of thing. We make and produce them, warehouse them and ship them to individual locations for a number of clients, both in the consumer package business and also in the entertainment industry.

Q When did you say you commenced this business?

A It was about a year and a month ago.

Q Early in 1987?

A Sometime in March of '87, actually.

Q What was your employment prior to that time?

A Prior to that I worked for the Karl-Lorimar Division of Lorimar Telepictures from December 1985 until March 10, 1987.

Q What was your job title?

A I was Vice-President of Sales.

Q Before we go any farther, Mr. Hunt, let me ask you:

The Commission mailed you by certified mail a letter and the letter enclosed a subpena requiring you to appear at a deposition and also a request for production of documents.

Did you receive that letter?

A Yes, I did.

Q Please tell us what efforts you made to respond to the document production request.

A There were two types of documents that I felt like would be advantageous for this particular deposition. The first were the actual checks that had been written and I assume that we'll get into in a couple of minutes to the Carter for Congress and also Citizens for Townsend.

Unfortunately my check register was stolen with my briefcase in Los Angeles. I believe we reported this to Ms. Jacoby and gave her the police report, et cetera.

The bank only keeps its information on microfische and because I could not give them an exact check number or date of the check, they could not give me Xerox copies.

It's First Instate Bank's policy not to go back and make record copies of an entire person's statements.

So they told me I would have to do that by subpena, but I'm certainly willing to give you the address of the branch and the account number for you to subpena that.

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Q Before you go further, do you have that information with you?

A No, I don't, but I can certainly get it during the break. I have it at my home.

The second was records that I thought I had in my home which referred to some airplane trips that had happened, but unfortunately I didn't have those after reviewing my files.

When I was terminated from Lorimar Telepictures, we were locked out of our offices and all the files were confiscated, which is not unusual when a senior executive is asked to depart under less than admirable circumstances. And as a result of that they are the only ones that have that information, although I have on a number of occasions spoken to them and said if they would like for me to aid them in any way on telling them what flights I was on that may have stopped in places or had people on them that may have aided in this, that I would be happy to to that, although they have not taken me up on that at this moment in time.

Q I wonder if you could just describe for us with a bit more specificity the documents that you thought would be response which were kept by Lorimar.

A There were two types. Whenever we took private jet Stuart Carl used to on a number of occasions requested

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that I would be the person who would request the jet and would write the actual request for what was going to transpire on that particular trip, because he felt like, his concept was, well, if you request the jet, I can approve your use of that, but if I want to use the jet, someone at Lorimar has to approve on that, so it's easier if I had done that.

So I was going back to try to find that during, through my files, if there were any of those documents remaining.

And the second was any time after a trip had been taken, a bill would come through from Martin Aviation Company which would list, if I remember correctly, it listed the cities where we stopped and the destination, the pilots, and I also think it accompanied on there the individuals who were on the charter plane itself also.

So those were the two types of documents that I was after.

Q Thank you.

Mr. Hunt, can you tell us if you consulted with anyone, other than counsel, to prepare for this deposition?

A No, I have not.

Q At this point, why don't I ask you: Are you represented by counsel here today?

A Yes, I am.

Q And can you identify him?

A Yes. He is Jeffery Ettinger, who is our corporate Executive Vice-President General Counsel.

Q And is he representing you personally at this deposition today?

A Yes, he is.

Q Thank you.

Mr. Hunt, did you use any documents to prepare for this deposition?

A No, I did not.

Other than reviewing the documents that you mailed me to determine where to come.

Q I wonder if we can get back now.

You said that your title at Karl-Lorimar was Director of --

A Vice-President of Sales.

Q Vice-President of Sales?

A Yes.

Q What did that job entail?

A That had the basic responsibility for generating sales, a pre-recorded video cassette tapes throughout the Continantal United States and Canada, in addition to revealing international distribution with independent companies. I had a sales group of about 17 to 20 sales managers and sales staff in the field, that would be throughout the United States.

Q What was your employment prior to working Karl Lorimar?

A I was Western Zone Sales Manager for Vandekamp's Frozen Food Company. And that was for approximately two years prior to Karl-Lorimar.

Q And as Vice-President in charge of sales, who did you report to?

A I reported, had line responsibility to Court Shannon, although Stuart Karl had all of the executive staff members who were senior staff members for all intents and purposes reported directly to him regardless of how the organizational chart may have outlined that.

Q Can you describe for us what the organizational chart set forth?

A Sure. Stuart Karl was President and Chief Executive. Court Shannon would be Executive Vice-President. And then under Court there were a variety of senior vice-presidents, myself, a gentleman by the name of Jeff Jenest, who was Vice-President of Marketing. Our General Counsel, Vice-President of Business Affairs, Neal Baseman.

Q I'm sorry. this fellow was both General Counsel and Vice-President of Business Affairs?

A Yes.

Vice-President of Production if I remember correctly was E. J. Oshins.

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Vice-President of Acquisitions was Steve Bornstein .

Vice-President of New Products was Mark Lambert.

Vice-President of Accounting was John Lutgens.

Vice-President of Shipping was Neil Murphy.

And I think that I have --

Q Exhausted the field?

A I think that was it.

Q You said you started your employment at Karl-Lorimar in December 1985?

A That's correct.

Q And the structure you were just describing, was that true throughout the duration of your employment?

A That was basically true throughout. Jeff Jenest was hired about the same time that I was. And Neil Murphy was terminated about two or three months prior to my departure. Other than that, to the best of my recollection, that's how it was.

Q Are you aware who the Directors of Karl-Lorimar, the names of the Directors of Karl-Lorimar?

A To my knowledge, Karl-Lorimar did not have any directors, nor did Karl-Lorimar ever have a Board of Directors' meeting. The fact of the matter, I did not know that Karl-Lorimar was a separate company that had stock until

my departure. I thought it was a Division, just a wholly-owned Division of Lorimar Telepictures.

Q So at the time that you commenced your employment, the company was a part or you thought was a Division of Lorimar Telepictures?

A Yes. I was recruited by Kornferry International. Their managing vice-president, a woman by the name of Caroline Nahas. And she explained it to me to the best of my recollection that it was a Division of Lorimar Telepictures but that it was run by this guy, Stuart Karl,and I did not know that it was a separate company, nor did I know, to my knowledge they never had any Board of Directors' meetings. Certainly Stuart Karl never alluded to that. I am certain I would have been made aware of it.

Q Were you aware of the existence at that time of a separate corporation called Karl Home Video?

A I was aware that Karl Home Video was purchased by Lorimar and I thought that that's what became the Karl-Lorimar Division of Lorimar Telepictures.

Q So you weren't aware of a separate entity called Karl Home Video after you commenced your appointment?

A Well, after I commenced my employment I assumed that Karl Video Corp had gone away as a corporation, that it had been absorbed into Lorimar Telepictures Company. But I am aware of Karl Home Video Company, what they did.

Q Which you say you thought pre-existed, was the predecessor of --

A Of Karl-Lorimar.

Q I wonder if at this time, Mr. Hunt, I can read you the names of some individuals, some of whom I think you have already identified, and ask if you recognize them and if you do, you know, what your acquaintanceship is with them.

Are you familiar with the name of Janice Benlein?

A Yes. Jan Benlein was Court Shannon's Executive Secretary.

Q And Dennis Blackburn?

A Dennis Blackburn had left the company prior to my employment and I do not recall what it was that he did, although I do know that Mr. Blackburn was a senior executive of the company, but I don't know what particular post he held.

Q You're not sure when he left, but it was some time before you?

A That's correct.

Q How about Robert W. Bonham?

A Robert Bonham reported to me. He was our Director of Sales and then ultimately promoted to Vice-President of Sales. And he would have been the person who

I would have considered my kind of right hand individual.

Q I'm sorry. When he was promoted to Vice-President of Sales, what did that leave you?

A Well, I was promoted to Senior Vice-President of Sales and was going to be Senior Vice-President of Sales and Marketing. Unfortunately that happened very close to the end of my relationship with Lorimar Telepictures and it never transpired.

Q I'm sorry. Was there a separate Vice-President who had responsibility for Marketing?

A Yes. His name was Jeff Jenest.

Q Do you recognize Elizabeth Boughman?

A Elizabeth Boughman was in charge of, well, when I first started to work for the company, she worked for a gentleman by the name of Harold Weitzberg who was Executive Vice-President of Sales and Marketing and Court Shannon's equivalent at that moment in time.

After Mr. Weitzberg's departure from the company, she became our Data-Processing Coordinator.

Q When did Mr. Weitzberg depart?

A To the best of my recollection, he would have left sometime between the March and June period of 1986.

Q And at that time, what was the relationship between he and Mr. Shannon?

A In terms of a personal relationship or the

organizational relationship?

Q Organizational relationship.

A There was a phrase that Stuart Karl used called the triumvirate, and that was Stewart Karl, Court Shannon and Harold Weitzberg, although there was never any doubt from an employee's perspective that Court Shannon was the No. 2 man. Mr. Weitzberg had been there for a period of time. Mr. Karl had felt some loyalty to him and so he elevated him above the Senior and above the Vice-President level and called him an Executive Vice-president of Sales and Marketing, although I don't think that he had, ever had the clout from a corporate standpoint as Mr. Shannon did.

Q You did not report to him?

A No, I did not report to him.

Shortly after coming on board, it had been explained to me that I was to replace him shortly after coming on board. Mr. Karl had mentioned that I may be r eporting to Mr. Weitzberg and I said I would not do that before that happened and as a result of that he even moved him in charge of Creative Services or something like that, and Sales and Marketing fell under Court Shannon's responsibility.

Q Did you say that you reported to Mr. Shannon or Mr. Karl?

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A I said the organizational chart had me line reporting to Mr. Shannon, although the chain of command on a daily basis did not operate that way. Stuart Karl would call me into his office and explain things to me. He was not worried about my reporting directly to Court. Because of his nature, he was very concerned about revenue, profitability, he always wanted to know exactly what we were doing in Sales. And so, as a result, in practice, I reported directly to him.

Q Do you recognize the name of Linda Cacia?

A Linda Cacia was the Executive Assistant to court Shannon and had worked at the company almost since its inception.

Q Do you recognize the name of Anthony Douglas?

A That is Tony Douglas and he was a very close friend of Stuart Karl's. When I started to work for the company he was the Product Manager for the Playboy line of videotapes and then he became a person who was put into our Sponsorship Department. I don't remember if he was manager or director or whatever his title was. He was trying to sell sponsors of video-cassettes.

Q It was your perception that he was an old friend of Stuart Karl but he hadn't been in the business?

A He was a very old, dear and close friend of Stuart Karl's but he had not been in the business in the

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beginning but had been there for some time prior to my appointment.

Q I see. How about Abraham Kantzabedian?

A I only knew him from what Stuart Karl and Court Shannon said about him personally. I do not know what he did from a professional perspective in the company, although I had the general impression that it was not of any serious consequence.

Q Do you know what the title was?

A I do not know what his title was, no. But I do know that they said that he basically was just almost like a personal valet to Stuart and that he would run errands, take clothese to the cleaners, make deposits at the bank. From what Stuart Kark and Court Shannon had said to me on a number of different occasions, he was not one in any serious management position. Certainly not in any major decision-making.

Q And had he been with the company since your arrival?

A He actually had departed prior to my arrival and I don't know for what period of time he worked there.

Q So the information you'r relaying is what you had heard from Stuart Karl and Court Shannon?

A Yes.

Q I see. What about Linda Kinwald?

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A Linda Kinwald, when I started at the company, worked as one of the Executive Administrative Assistants; I not really certain who she reported to directly. But she was one of the people that worked in that office of Court and Stuart. There were a number of people who worked in that particular department of the company. And she then became the Executive Assistant or Executive Secretary to Michael Parino, who was Chief Financial Officer.

Q What was his name again?

A Michael Parino.

Q And was he the Chief Financial Officer during the entire time of your employment?

A John Lutgens was the Vice-President of Accounting and basically all responsibility for financial matters until approximately July or August 1986, when Michael Parino was hired in the company and became Chief Financial Officer.

Q How about Rama White?

A Rama White was Stuart Karl's personal secretary. She did very little work from a business perspective. She really didn't do a lot of Karl-Lorimar business but took care of all of Stuart's personal business, and that included everything frompaying his bills to setting up all of his charter trips, and that type of thing.

Q Would you have had interactions with her?

A Only at times that I was chartering a plane or

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if I needed to see Stuart, her desk was right outside of his office, a cubicle outside his office.

Q Nick Norton?

A Nick Norton was a Product Manager, responsible for the Jane Fonda video line the entire time that I was at Karl-Lorimar.

Q When you say Product Manager, what does that mean?

A He basically had marketing responsibility for generating the marketing plans for that particular product, advertising, public relations, promotion, price.

Q How about Robynne Philipsen?

A Robynne Philipson, she was just a clerical person in the administrative offices.

Q And Kelly Ramsey?

A Kelly Ramsey was a friend of Stuart Karl's and to the best of my knowledge was an outside sub-contrator that did electrical work, we would buy cameras from, that type of thing.

Q He was not an employee?

A To the best of my knowledge, he was not an employee.

Q And Michael D. Ray?

A Michael Ray does not ring a bell.

Q And Michael Severy?

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A Mike Severy was, worked at Karl-Lorimar only for the last four or five months of my employment. He was terminated the same time or very shortly after I was terminated. He was assistant to Stuart Karl, although he was brought on from Martin Aviation. He was the person that charted all the jets and really would have probably more knowledge of all the jet and charter trips than anybody and was hired, I think, out of loyalty from Stewart. Unfortunately he did not serve any real purpose at the company and therefore was terminated immediately upon the purge.

Q I'm sorry. The purge?

A When Lorimar came in and fired everyone who in any way had been associated with Stuart Karl, either from a personal basis or friendship basis or an outside supplier basis. They came in and terminated the relationships with almost all those people.

Q When was that?

A In the general March to May 1986 period.

Q 1986?

A I'm sorry. March to May 1987.

Q I see. And that's when you left, as well?

A I left March the 10th.

Q Do you recognize the name of George Unwin?

A George Unwin was a personal friend of Stuart Karl's. As matter of fact, his best friend, according to

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Stuart Karl. And he also was an outside independent video producer who Stuart sent a lot of business his way.

Q Do you recognize the name of Nathan East?

A No.

Q How about a Mr. Cooper?

A Can you give me a first name?

Q No.

A Well, Cooper was the first name of Stuart Karl's oldest son, Cooper Karl. But I do not know a Mr. Cooper.

Q How about Jonnie Layman?

A No, that does not ring a bell.

Q Dean Bender?

A Dean Bender was President of the public relations firm of Bender, Goldman & Helper. I think he was President. He was certainly Director and Officer of the company. That was our outside public relations firm that we used at Karl-Lorimar.

Q A Mr. Meyer?

A That does not ring a bell.

Q Steve Rivers?

A Steve Rivers was Jane Fonda's personal manager, although she did a lot of the work of personal manger, he was her Executive Assistant, Ms. Fonda's.

That's a popular title; isn't it?

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(Laughter.)

Q How about Gino Thinasquieu?

A The name rings a bell but I can't recall. I remember a Gina Cantalano, but not a Gino Thinasquieu.

Q Who would that have been?

A Gina Cantalano was also a Product Manager who was a dear friend of Stuart Karl's and she worked in the company the entire time that I was there, the best as I can recall.

Q Do you recognize a Doug Ayers?

A Doug Ayears I knew as a friend of Stuart Karl's but I do not know him or their relationship today.

Q Griff Amies?

A Griff Amies owns a public relations firm called Amies & Associates. He is also a very close friend of Stuart Karl's. But I don't know what the relationship is today.

Q Is that a firm that had a business relationship with Karl-Lorimar?

A Not to my knowledge. It may have, but it was unknown to me.

Q Do you recognize Con Gillum?

A No.

Q And Mark Lambert I think you said was a Vice-President?

A Yes, he was a Vice-President for the company.

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I don't recall his exact title but he basically worked on new products.

Q How about a Tom Haymen?

A Tom Haymen worked for Mark Lambert in the same department.

Q And Bob Roark?

A Bob Roark was a personal friend of Stuart Karl's who ran a company by the name of Promoview with Stuart Karl owned through a woman by the name of Betty Weir. And to the best of my knowledge still works for Stuart Karl.

Q Was that a firm that had a business relationship with Karl-Lorimar?

A I know it was a firm that had tried on a number of occasions to sell its services to Karl-Lorimar. I don't know if Karl-Lorimar ever paid any money to Promoview. It did not do it through my department or through Jeff Jenest's department, because the two of us talked about them coming and soliciting work from us.

Q Was it your impression that it was a company that was wholly-owned by Stuart Karl indirectly?

A Yes.

Q How about Marvin Murphy?

A No, it doesn't ring a bell.

Q What about Dale Unvert?

A Dale Unvert is a o-b-g-y-n, I guess that's

an obstetrician and gynocologist, who is also a very personal friend of Karl's. He traveled with us on a number of occasions and just kind of hung around Stuart Karl. But I don't think there was any business relationship there.

Q And Dennis Walto?

A Dennis Walto was introduced to me as the advance man for Gary Hart and he was put on the payroll, to the best of my knowledge, at Karl-Lorimar.

Q When was that?

A I do not know when it was, but it was sometime in the middle part, I would say the latter part of '86. Stuart Karl had asked me if I would put him in my department and after declining, he then, I didn't hear any more about Dennis Walto until he would come in the office on infrequent occasions, he was actually out in the field, and I just had assumed that he was put into some department under Karl's guidance.

Q And Richard Wagner?

A No, it does not ring a bell.

Q Please tell us to the extent that you know what other business firms Stuart Karl had owned or had a financial interest in.

A Let's see. I've mentioned Promoview.

He did have a financial interest in George Unwin's companies and that was, Stuart Karl had told me

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on a private plane once, that it was in his financial interest that George Unwin did well. And I assume that to mean that George Unwin either paid him back money or somehow Stuart had invested in George Unwin's company, which I think was called Rewind Productions, to the best of my knowledge.

Q You do not know exactly what his interest was?

A No, I do not. Promoview had been explained, Stuart Karl explained it to me that Betty Weir basically was just a shell owner of that company and that it was indeed owned by Stuart Karl himself.

Q And Betty Weir?

A Betty Weir was the mother of a woman by the name of Alison Weir, who worked on a number of Gary Hart related issues. And I do not know if she was on the payroll with Karl-Lorimar or not. I suspect that she may have been.

To the best of my knowledge, those were the only companies that I can recall Stewart Karl having some kind of financial interest in.

And, of course, the one that became public was Continental Marketing, which was a company that Stuart Karl owned through his dad. Court Shannon owned a minority interest and I owned a minority interest in, and that was ultimately the company that Lorimar terminated our employment as a result of our selling services back to the parent company.

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Q What business was that company in?

A That company was in the same business that COMAR is in, marketing for film and creative services and design. And we found a niche in being able to offer services at a substantially reduced price versus current suppliers were offering to the company. And we started bidding on jobs openly and unfortunately Stuart Karl had never disclosed that and since he was the only officer of the three of us and had a contract, Lorimar Telepictures requested that we resign as a result of not having disclosed that to the parent company.

Q And was that company wholly owned by Stuart Karl?

A No. It was owned, 51 percent was owned by George Karl, who is Stuart Karl's dad, although Stuart Karl actually owned the company. His attorneys had requested he put it in his dad's name because he was the only officer and that would be the way to circumvent the company being able to terminate him as a result of that release. At least that's what everybody thought.

And then it was owned, myself & LAB the other 49 percent was owned by Court Shannon and ~~I owned the balance.~~

Q Can you describe the relationship between -- Let me ask you first:

Was there an entity called Karl-Lorimar Pro-

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ductions?

A I don't know if there was or not. To the best of my knowledge, I never recall a Karl-Lorimar Productions, but that doesn't mean there couldn't have been.

Q Please describe the relationship between Karl-Lorimar Home Video and the parent Lorimar Telepictures?

A Okay. We were a separate entity in terms of physical structure. We were located in Irvine and they were located in Culver City. And it was a very loose relationship. Stuart Karl reported on a formal basis only through a bi-weekly letter of some sort Court Shannon actually wrote and I used to read and recall how superficial and surface it was. There were no formal meetings between Karl-Lorimar senior officers and Lorimar Telepictures people except at such time as Stuart Karl would, "I'd like to come up and talk to you guys about this or that." There was no kind of monthly, every Friday, the third Friday of the month or whatever, you guys come up and tell us what's going on.

To the best of my knowledge Lorimar Telepictures did not have a financial person working in our building, supervising our collections and payables and that kind of thing.

And it seemed to me, having had the kind of relationship, the kind of employment that I'd had for ten years, almost eight years with Crocker & Gamble Company and

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another couple with Vandekamp's, which was a division of Pillsbury, it's seemed to me to be awfully loosely run and very poorly managed from that perspective.

I'm not certain that's the question, that I'm answering the question correctly, but in terms of what relationship there was, it seemed to be to be kind of a simple, casual phone relationship, almost.

Q So how frequently do you recall Stuart Karl or Karl-Lorimar executives actually having meetings with officers of the parent company?

A Well, I can't -- my travel was very extensive. I was gone normally every Tuesday, Wednesday and Thursday. And as a result of that I can only tell you the times, it was unusual for Stuart Karl to say "You have to come back" or "You may not make this trip because we have to make a presentation to the executive staff." But to the best of my knowledge, the Karl-Lorimar executive staff only made one presentation to the Board of Directors at Lorimar of which I was not in attendance of that, and I can only recall going up, I would say between eight and ten times, it may have only been between six and ten times in front of the executive staff at Lorimar Telepictures.

So that would be at least from my perspective every four or five weeks, six weeks, something like that.

Q Do you have an impression that Stuart Karl or

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other executives might have gone on a more regular basis?

A That is possible. And it is certainly possible that, and I did get the distinct impression, that they spoke on the phone on a regular basis. I do know that the, it was always explained to me that the chain of command was directly from Stuart Karl to Tony Young and they spoke certainly on a regular basis on the phone, but as I mentioned it was not nearly as structured as I would have expected it to be.

Q And who was Tony Young?

A Tony Young was the Chief Financial Officer of Lorimar Telepictures.

Q To your knowledge were there any Karl-Lorimar employees who were housed at the parent company?

A Yes, there were. Our Vice-President, Vice-President of Business Affairs, Neal Baseman, was housed there.

Steve Bornstein was housed there.

And a woman named E.J.Oshins I mentioned earlier, she was housed there. And two secretaries, or two or three clerical people were housed there. In addition to a couple of other middle managers. I can't recall their names.

Q What did you understand the purpose for that?

A My understanding was that those people lived in Los Angeles, that it was a very long commute for them.

The space was available at Lorimar Telepictures and this was really more of just a perk for those particular individuals because their job functions did not require them to be in the Irvine office with any regularity.

The fact of the matter is that they, if I remember correctly, all of them at one time or another worked in Irvine and that move was made because of them mentioning to Stuart that the commute was just too far for them to continue employment otherwise.

Q Were you familiar with the operating procedures of Karl-Lorimar Home Video?

A I'm not exactly certain what you mean by operating procedures. The financial authority, yes. If you mean who could authorize a check or who could sign on a check, it was Stuart Karl, Court Shannon, John Lutgens, and then later Mike Parino. To the best of my knowledge, those were the only four people that could authorize any kind of payment or -- Other people could request payment, such as myself, I could say, "We need a check to this person," but it would have to be approved by, I don't think it even could have been approved by John, it would have had to have been approved by Mike Parino once he was there or by Stuart Karl or Court Shannon.

Q Did Stuart Karl keep a tight rein on things? Did he --

A Yes, he did.

Q -- follow affairs very closely?

A Actually there was kind of a great irony in that regard. He was like a lot of poor managers, in my opinion, in that he wanted to have a tight rein on everything but never devoted the time to really understand why everything worked the way it did. But there were things, very obscure things, that he would come in and want to know why they happened or that sort of thing and to kind of flex his authority. Yet if you tried to sit down and say, "I'd like to explain to you exactly how this works," he never really had time. Or most of the time didn't have time for that.

Q How many bank accounts did the company have?

A I do not know.

Q Who was the Comptroller of the company at the time you were there?

A I think it was John Lutgens, but I'm not certain of that. John Lutgens was certainly the only financial officer for the longest period of time I was there and when Mike Parino came in, he may have become Chief Financial Officer and then John stayed Comptroller. I'm not really exactly certain now how that happened.

Q You said you were the Vice-President in Charge of Sales, the Senior Vice-President in Charge of Sales?

A That's correct.

Q And you also said that you had reporting to you people who were in the field?

A That's correct.

Q Did you have individuals reporting to you housed at Irvine?

A Yes, I did.

Q And who were they?

A Ed Hanlon. Bruce Levinberg. Mark Norseth. Billy Callanan. Pierre Loubet. Rob Bonham. Their entire clerical staff. The entire Telemarketing Department, which was about six or seven people. I can name them if you need the names.

Q If you would, please.

A Okay.

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Dusty Fields. Bill Karl. Brad Ackerman. Scott Brouchet. Barbara Barr. Chip Nadeau.

Order Entry people were Gale Goldberg and Joanne Johnstone.

And to the best of my recollection that's about all the people in Irvine who reported to me.

Q You have a good memory.

And the titles of the individuals, not in the Telemarketing but the other individuals, what were their titles?

A Let's see. Pierre Loubet was Vice-President

of New Markets. Rob Bonham I mentioned was Director of Sales who ultimately became Vice-President of Sales. Ed Hanlon was a middle manager in the theatrical division. I don't remember his exact title. Bruce Levinberg was West Coast Director of Sales for Theatrical Products. That's motion pictures versus things like Fonda and other products like that.

Martin Norseth was a region manager for all products except theatrical.

Billy Callanan was a sales trainee, an individual who we had recruited out of Berkeley and he certainly had a good career up in the Bay Area with Coldwell Banker or somebody. We recruited him to come in and ultimately become a region manager for us some day.

Dusty Beals was Manager of our Telemarketing Department.

Gale Goldberg and Joanne Johnstone were the two Managers of our Order Entry Department.

And those were basically all the managers.

Everybody else was either Telemarketer or clerical person to the best of my recollection.

Q What were the titles of the individuals who were in the field as you described it?

A The people in the field, I had region managers located in New York, Boston, Atlanta, Chicago, San Francisco and Dallas, Texas.

Q And they were employees of the company?

A Yes, they were.

Q Did they have staff working under them?

A They had clerical people working for them and they may have had one detail person in eath market who would actually go to retail stores and ascertain competitive activity and that type of thing. But certainly no individual had more than two people reporting to them. That would be the maximum.

Q And what was the responsibility of those individuals?

A Those individuals had a specific geographic responsibioity; within that geographic responsibility they had customers, both direct buying customers, it could be like a Safeway or a Federated, or it could be, or they had distributors and that would be someone who actually would take title of our product, not unlike a beer or soft drink distributor, and then they would in turn sell that to small stores.

And these individuals called on, within that piece of geography which was between five and seven States, approximately, they would call on all the customers within that particular geography.

Q When you say "customers", do you mean stores, retail stores?

A Mean the direct-buying customers or the distributors. They normally did not go into individual stores to sell. There were just too many stores and these people were much more capable, they were handling a better picture type thing.

The company was broke from a sales perspective into three primary areas: Theatrical, Exercise and Sports related videos, and all other.

So I had, it would be possible, for example, in New York City, that I had one guy responsible for theatrical, one person responsible for sports, fitness and health and exercise,and then one person responsible for the balance of our product.

Q Would there have been any other executives or managers at Irvine, or, for that matter, I guess at the parent company, who had people reporting to them from the field?

A Mark Lambert had one person or two people reporting to him from New York.

And other than that --

Q You said Mr. Lambert was in charge of New Products?

A Yes. Yeah.

Other than that, though, I don't think, I don't recall anyone having other field people. Certainly not

any number of field people reporting to him directly.

Q And what would have been the responsibility to the individuals reporting to Mr. Lambert?

A They would have done one of two things. They would have been searching for new product, for example something that comes to mind was, oh, hell,I can't remember the guy's name, you know, the "Power of Positive Thinking" guy who lives in New York and everybody knows his name.

Q Erhardt?

A No. No.

Well, whoever it is, this guy went to try to sell him on producing a video and allowing us to do his video.

That would be the types of things that they would do.

Orthey would be out trying to sell sponsor video cassettes. It would be like going to people who made Ban Roll-On Deodorant and saying they would like to get a spokeswoman do an exercise video with Ban Deodorant as the people who sponsored that. The obvious tie-in there is most Ban happens to be used by women predominantly. And also when you exercise hopefully you use more deordorant than you do otherwise. So that's the marketing tie-in.

Q So that responsibility would not have involved the sale to retail stores at all or involvement with retail?

A No. The people who reported to Lambert did not do any of the retail business at all.

Q Mr. Hunt, do you recognize something called store profiles?

A No. Although we had detail people who would go into stores and they would check out product supply and they would check out the competitive activity and that type of thing. But they were far removed from me, five or six, seven, down the chain of command.

It's possible that they might have completed store profiles and returned them to Rob Bonham. But Rob and I were very close and I think I would have recalled seeing a store profile sheet from somebody at some moment in time.

Q These were individuals who would have reported to the Regional Manager?

A That is correct. I knew all of those people and actually had played a role in hiring each of those people, either directly or indirectly. So I was familiar with all of those people in the field.

Q And as far as you know, then, the sort of employees, the only sort of employees who would do evaluations of particular retail stores would have been the detail people reporting to the Regional Manager?

A That is correct. Who would have been under the Sales Department.

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Q Are there individuals at Karl-Lorimar whose title was Assistant Production Manager?

A I'm not familiar with anyone who was an Assistant Production Manager.

Q Can you speculate about where such a person, under which branch of the company such a person might have been employed?

A If there had been an Assistant Production Manager, that person most likely would have worked for Steve Bornstein or E.J.Oshins. But once again I don't recall such, Assistant Production Manager.

Q You were pretty far removed from the production end?

A Well, I was up until a point. I was removed up until the point where it became a serious possibility for the company to make the acquisition or actually produce the show. At that moment in time ~~obviously~~ anticipated estimates of sales, ~~it~~ was necessary for us to calculate our return on investment. So I worked with both of those departments fairly closely in ascertaining at least in the latter stages of projects what the estimates would be. But in actuality I was even involved early on in a number of instances because people wouldn't want to look stupid and say, "I think this is a great project," and then present it before the Executive Staff to have me go, you know, "No, we wouldn't be

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able to sell any of those." Which is what we did on the "Power of Positive Thinking," if I remember correctly.

Q Although you're not familiar specifically with a title like Assistant Production Manager, is it your feeling that such a person would not be involved in visiting retail stores or having contact with retail stores?

A No. Certainly not as a primary function of their employment, they would not have done that.

And it was also customary that most people that went into the field from another department contacted the Sales Department and they were either accompanied or given information by a field manager. Otherwise it would be ludicrous for them just to go to Chicago and just go around to a bunch of the stores. It was much better to have the Regional Manager explain what the key stores were and where to go, et cetera, et cetera.

Q In what sort of instances would that kind of thing have taken place?

A That may have happened if an individual wanted to do a, let's say, for example, somebody wanted to do a tape on golf, and they wanted to go into retail stores and find out was there a golf section, how many golf tapes were there. But the fact of the matter is it is done so infrequently because, as you would suspect, most people would take up the phone and call the Regional Manager and say:

"Hey, will you go out and will you see the stores, how many golf tapes are there or where they are located, et cetera, et cetera." It just wasn't -- we didn't have a lot of travel by other departments into the field to check stores.

Q You testified, Mr. Hunt, that you were introduced to Dennis Walto some time in mid-1986. I wonder if you can go into a little more detail of how you came to be introduced to him and in what capacity you understood he was to work? That sort of thing.

A Yes.

Would it be okay if we take just a brief break? I'd like to use the restroom. There's no reason at this time I need to. I just . . .

MR. BERNSTEIN: Certainly.

We'll go off the record for a moment.

THE WITNESS: Great.

(Recess.)

MR. BERNSTEIN: Okay. We're back on the record.

BY MR. BERNSTEIN:

Q And if you would, Mr. Hunt, please respond to my question?

A Sure. Dennis Walto was introduced to me, I can't remember the exact time frame, but I'm going to assume mid-1986, as an advance man for Garry Hart and someone who worked full-time on the Hart campaign.

He worked in our office I would say on a daily basis, certainly three days a week, at least. I never really knew what he did. I just happened to pass by the particular area where he sat and made phone calls and did administrative work. I never spoke to him at any great length.

Stuart Karl came into my office one day and said, "Gary, I would like for you to put Dennis Walto into your department as a region manager. He can go out and check stores and I think it would be a great opportunity because he's a great guy. And he's a very capable and talented person."

Q I'm sorry, Mr. Hunt. Was this before Mr. Walto began his employment? The start of it?

A Well, I don't know that he was on the Karl-Lorimar payroll at the time he was coming in the offices or if he was just using our facility. That's generally the impression that I got and I don't even know the first date that he received a Karl-Lorimar paycheck. All I know is that Stuart Karl had requested that I put him in my department.

Q This was after he was already housed there for how long?

A I would say approximately three or four weeks.

Q I see.

A And then, and he said, "I would like for you to pay him $3,000 a month. That's what I'd like his starting

salary to be. Plus a car allowance." Then he said, "Or we can let him drive one of the company cars here," because we had a number of cars that were available.

And he said: "Now, if anybody from Lorimar calls, just be certain and say he's working for us full time and that he's a legitimate sales manager."

At that time I explained to Stuart that I really did not think that was a wise idea because I had some very capable and talented people, certainly much more capable and talented than Dennis Walto, making less than $3,000 a month, and that not only did I not need anybody to perform the function that he was requesting, but I really felt that it would be bad for morale of the sales organization if this guy who was wearing corduroy pants and striped shirts and, you know, bow ties, went out in the field with one of our sales managers making more money that a guy whom we recruited away from companies like Black & Decker that had very legitimate sales backgrounds.

Q Did he dress casually?

A He dressed, I would say, in a collegiate-type manner, yes. He always seemed to have a tie and I would say nicer than your run of the mill pants or slacks, but certainly didn't seem to dress in a business manner, like a dark suit or that type of thing.

Q Tell me again what responsibilities Stuart Karl

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gave you to understand Mr. Walto would have?

A He told me that he would basically go out and just determine from making calls on individual retail stores what our shelf space was and how many titles we were selling per store and what the competition was. And Stuart said he can just kind of give us a feel for what's happening out in the marketplace.

And I explained to Stuart that with as many people as I had, I knew what was going on in the marketplace and that I really did not think it was a good idea to put him on the payroll to do what he was requesting.

And so Stuart Karl said, "Well, let me rethink that and see maybe if there's someplace else that he can be put," or some particular gist to that, and he then left and that's the last that Dennis Walto was ever mentioned to me and I really never knew for a fact whether he was put on the payroll or not.

Q And why did you understand Stuart Karl wanted to put him on the payroll?

A My understanding was that Stuart Karl wanted him to be put on the payroll so he could be, continue doing advance work for Garry Hart. Stuart was not the type of person to come right out and say, "Gary, I want you to do this." As a general rule he was not the type of person who would have come out and said, "Look, I'm Karl-Lorimar. I'm going

to put this guy on the payroll and I am going to have him do all the Gary Hart work." But there was a clear understanding that Dennis Walto, the way Stuart described that position, would not have any real direct accountability to the sales manager in the field or to me in particular. He would just kind of go out and do what he felt to be fit in any particular area that he thought necessary to do that. And to a guy that didn't have the experience or knowledge, there is nothing else, from my opinion, that he could have been doing other than just, you know, working on the same stuff he was working on, whatever that was. And then, you know, maybe stopping in a couple of stores a day just to justify his being there.

Q So your understanding is based on primarily on how in the ordinary course this was presented to you?

A Correct.

Q Was there any other basis for your understanding?

A No.

Q Did you have conversations with other employees or executives about it?

A To the best of my knowledge, I can't recall having any other discussions with anyone regarding that. If I did, it would have been a small conversation that I just don't recall at this moment in time. Nothing of any conse-

quence where I went in and said, "Hey, I think this is wrong" or "What do you think about this?" I can't recall any conversations like that.

Q How did you come to know that Walto might have have previously acted in a capacity for the Hart campaign and might do so in the future?

A Well, Stuart introduced me as he was Gary Hart's advance man and that's what he did full time was go out in the field where Gary Hart was going to give a speech. I remember him talking about he was going to give a speech at Duke University or something and Walto went there and made, you know, did all the things that I guess an advance man does. I'm not real certain what that is. But the way it was presented to me was such that this Walto would have the opportunity under the Karl-Lorimar umbrella that kind of go into any part of the country where he needed to be to, basically on his own, determine where he may want to go check out competitive activity. To me, as, you know, as an adult, professional business manager, this seemed awfully suspicious, that we were going to hire this guy who has no sales experience, certainly no experience in understancing competitive activity, which is a very complicated issue, give him free reign, basically a freeAmerican Airlines pass and say, "Go where you think is best for the company and assuming that he was doing legitimate Karl-Lorimar business, it never

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crossed my mind that that was the purpose of that.

Q Do you know did anyone previous to Mr. Walto or subsequently been hired under such circumstances?

A We had a number of people in the field who were detail people and part of their job was to determine what was happening in retail stores.

Q I'm sorry. Let me restate my question.

In the out of the ordinary course circumstances in which you perceived Mr. Walto to be.

A No, there was no other circumstance where that happened.

Q Do you know who if anyone interviewed Mr. Walto for a position at Karl-Lorimar?

A To my knowledge, no one interviewed Dennis.

Q Do you know who made the decision to hire him, if he was hired?

A From the conversation that I had with Stuart Karl that particular day, my assumption was that Stuart Karl had made the decision to hire Dennis. It was just a matter of where he was going to be placed.

Q And what was your best impression of where he ended up?

A My understanding came after the fact, after my termination, that he was in the Production Department as an Assistant Production Manager and I did not know that until

Tom Fiedler of the MIAMI HERALD asked me if I had known a assistant production manager named Dennis Walto.

Q If he had been in that department would he have reported to Mr. Lambert?

A Depending on what he had been doing in the department, he could have reported to Lambert, Bornstein, or Oshins. Most likely Lambert or Oshins.

Q Would he have had any relationship with Court Shannon?

A He should not have directly.

Q Now, you said that when Stuart Karl came to you, Dennis Walto for some period of time had had an office at Karl-Lorimar.

A It was actually more of a space in where a secretary would sit, a desk, a phone, the use of the FAX machine. But he did not have an office per se.

Q Did he continue to be at that desk after your conversation with Stuart Karl?

A On less frequent occasion, although I do remember him for a period of, to the best of my recollection, four to six months. I remember him being around the office, although he did, after my conversation with Stuart Karl, he did seem to be out in the field a lot. He seemed to be out of the office a lot more. I wasn't really certain, nor did I care where he was. I never really understood where he was.

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Q Would you try to approximate the number of days or the period that he was in the office after that?

A I would say he was in the office maybe a day or two a week and then it became for the first couple of months, and then it became a little bit more sporadic where he was in the office maybe a couple of days every couple of weeks.

Q And do you know, you know, ultimately what the financial relationship was between him and Karl-Lorimar?

A No, I don't, other than Tom Fiedler mentioned something about $3,000 a month and the use of the Ford Bronco which was a company car and I did see Dennis Walto drive, did see him drive when he was there full time. I didn't see him drive it, nor was I ever told that it was his full-time car.

Q Well, that was consistent with the terms that Stuart Karl had explained that he wanted Walto to be brought on?

A That's correct.

Q To your knowledge did Mr. Walto have contact with anyone in the field who ultimately reported to you?

A No, to the best of my knowledge he did not have contact with anyone in the field who was in my department and reported either directly or indirectly to me.

Q Is it conceivable that he might have had

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contact which didn't, you know, wasn't ultimately relayed up to you?

A That would have been highly unlikely.

Q Why is that?

A Because I, unlike Stuart Karl, did keep a close understanding of what was happening in the field, certainly with our personnel. I was very curious what they were doing, how they were doing, both personally and professionally. And I had contact with those people on a weekly basis and someone would have said, "Hey, I had dinner with Dennis Walto the other night," or "Dennis Walto worked with me," or I would have seen some report that Dennis Walto had made. Or my right-hand guy, Rob Bonham, was a very candid person and he would have said, "Gary, this is a stupid thing. Why is Dennis Walto in the field in our way?" And he never, and he was the person in the field all the time and he never mentioned anything of that sort to me.

Q To your knowledge no work reports from Mr. Walto ever wound their way up the ladder?

A To the best of my recollection, I never saw anything with Dennis Walto's signature on it or a memo from him regarding sales or production of any sort.

Q The reports, if anything, written by the detail people, were those reports that you would see in the ordinary course?

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A No, not in the ordinary course but on, I would say infrequent occasion, certainly if anything unusual was happening or if anyone was doing a particularly good job, Rob Bonham or one of the people who reported to him would send a note to me saying, "This woman, Debbie Deacon, is doing a great job. Here's an example of her administrative abilities." So I would see them, certainly enough to know they were out there doing something. But it wasn't sent to me daily.

Q Did Mr. Bonham receive these reports?

A I can't recall if he did or just the Region Manager himself actually received the report.

And actually in pretty much course with the company, it was left up to each individual Region Manager what the administrative accountability and responsibilities of the detail people would be. Some managers obviously like a lot more and some like less.

Q To your knowledge did Dennis Walto visit any retail stores for Karl-Lorimar?

A I could not answer if he did or not. To my knowledge he did not, but I can't say for a fact he didn't. Certainly he did not visit any that in any way came back to me in terms of any kind of analysis or data generation that he had done.

Q Did you receive any report, either written or

oral from elsewhere in the company about Mr. Walto's activities?

A No.

Now, let me state, I'm not so certain that those things may not have existed. I'm just saying that I never remember seeing one, either from the Production Department or from the Sales Department.

Q It's conceivable, for example, that Mr. Walto may have written reports that went directly to Stuart Karl?

A That's possible.

Although he would have been the only person in the Sales Department or -- he certainly would have been the only person in the Sales Department that would have written one that would not have carbons made. That was the standard procedure.

Q It would have been highly unusual?

A Yes.

Q In the ordinary course of things?

A Yes.

Q Please tell me the number of hours that a full-time person in the field was ordinarily required to work.

A They would probably work, well, I think the Manual said eight to five. But normally a Region Manager would work from seven, seven-thirty in the morning until

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about five-thirty or six in the evening and have a travel schedule about like mine, leave town on Tuesday morning, approximately and return Thursday afternoon, Thursday evening.

Q And the detail people?

A Detail people worked from probably eight to five-thirty or six and they didn't, in the normal course, did not travel. They only worked in the market that they had responsibility for, and those were the markets of Los Angeles, Chicago, Dallas, Boston and New York.

Q What was the average salary of the detail people?

A To the best of my recollection, it was approximately eighteen to twenty-five thousand dollars a year.

Q Did the detail people receive any other perks besides their salary?

A I can't recall if they received a car allowance or if they would receive a mileage allowance -- Excuse me. I do think that there was some compensation there for the travel because they did travel frequently within a city and they may drive a hundred, a hundred twenty miles a day, actually.

Q And the Regional Managers?

A Region Managers normally received a car allowance.

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Q Would your travel have included visiting Regional Managers?

A Oh, absolutely. I have met with Region Managers on probably three out of four weeks that I would travel. I would either be with a Region Manager on some presentation, meet with the Region Manager somewhere, at some dinner, something like that.

Q And do I gather that no Regional Manager ever indicated to you an awareness of the activities that Mr. Walto engaged in?

A No.

Q Were employees at Karl-Lorimar ordinarily evaluated on a regular basis?

A Yes. There was a three-month after initial employment evaluation. That was just simply to determine if the individual was going to work out or not. There then was a six-month review which under normal circumstances was a conversation review in addition to a performance review. And then, to the best of my knowledge, there was a review at the end of the first year.

Q And were these reviews done for every employee?

A To the best of my recollection, yes, they were done for every employee and they were sent to us automatically through the Personnel Department.

Q You don't remember any employees for whom the

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evaluations weren't given?

A No, I do not.

Q Did the detail people ordinarily submit work reports on a regular basis to the Region Managers?

A I suspect they submitted a weekly or bi-weekly calendar where they were going to be, what they were going to be doing. They certainly had some accountability to Region Managers and the Region Managers had kept some control over what they did or did not do.

Q Do you know if a performance review was ever done for Dennis Walto?

A I do not know.

Q Were you aware of a time when Mr. Walto's relationship with the company ceased?

A No, I was not.

To be specific, are you asking for the specific date that it happened?

Q If you know.

A No, I do not know. I think it happened after my termination but I can't say that for a fact.

Q Mr. Hunt, you mentioned that you had spoken with a reporter for the MIAMI HERALD; is that right?

A That is correct. Tom Fiedler.

And another gentleman who I can't remember his name.

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Q Did you speak with the reporters for any other newspaper?

A I spoke with, off the record I spoke with the people from L. A. TIMES and their question was just regarding who Stuart Karl was personally.

And then there was one question that was requested or that I answered from the ORANGE COUNTY REGISTER and that was a quote about being on a plane trip with Doug Rosen and Stuart Karl. And I just said, they said we have obtained records that show you were on a jet trip with Doug Rosen and Stuart Karl; can you tell us about that?

And I just said: I really have no comment other than the fact that yes, I did fly on that particular jet trip that you are referring to.

MR. BERNSTEIN: What I'd like to do now, Mr. Hunt, is to read to you and if it would be desirable to refresh your recollection we can put the article in front of you, but what I'd like to do is just to read to you the quotations attributed to you in the MIAMI HERALD article of 20 January 1988.

THE WITNESS: Okay.

MR. BERNSTEIN: And you are quoted that you stated as follows, quote:

"I'm certain that Dennis Walto was working on Gary Hart's campaign."

Quote: "We had full-time regional people out

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there. If I wanted to know about a store, I would call them."

Quote: "He" -- referring to Walto -- "was introduced to me as a Gary Hart person. If Dennis had been doing anything related to sales I would have known about it."

BY MR. BERNSTEIN:

Q Are those accurate statements?

A Yes, they are. And I certainly hope that that's what I've reflected here.

Q Is there anything else that you can tell us about Dennis Walto's activities that you think would be relevant?

A The only thing is that I do know that Stuart Karl mentioned to me that there were two or three times Dennis Walto was flown somewhere, accompanying someone on a charter trip that Stuart Karl had paid for. But I do not recall dates. Only the fact that Stuart Karl had mentioned to me that Dennis Walto, this was prior to Stuart's mentioning to me that Walto would work for the company, that he wanted Walto to work for the company. But that Walto was flying somewhere to meet Gary Hart. Or he accompanied a guy, Makay Danes, who had been introduced to me as a Gary Hart speech writer who also was around our offices for several weeks.

Q Would you spell that name for us again?

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A I believe it's M-a-k-a-y D-a-n-e-s. Makay Danes. And he accompanied, he, meaning Dennis Walto, accompanied Makay Danes someplace in preparation for something. But, once again, those are details that have long kind of since lapsed my memory, the specifics of them.

Q You said it was your impression this was before Dennis Walto came to Karl-Lorimar?

A It was -- No, it was after -- I think we should segregate, by coming to Karl-Lorimar, that does not mean being in the employment of Karl-Lorimar. It was after he came and started hanging around the office, but it was before Stuart Karl had put him on the payroll.

Q So it was sometime in that what you estimated to be a three-week period prior ro --

A Well, I think if you actually look at the time period, it would, it was three or four weeks before Stuart had the conversation with me. Then I suspect it was by a couple of weeks after his conversation before he finally placed him or whatever he did. This is just all my speculation. So we're talking a period of about a six-weeks' period there that Stuart would say "Dennis is doing this" or "Dennis is doing that." Stuart talked about him frequently. Stuart had a, I don't know if this is pertinent or not, but Stuart Karl was a pretty serious womanizer and Dennis Walto was always viewed by Stuart Karl as being somebody who was

highly capable with picking up women and that type of thing. So the two of them formed this bond, I guess, and Stuart was always talking about, hey, when he was in this particular location he met this beautiful woman. Actually that's how a lot of the conversations began and how I only knew that he was on the road because Stuart Karl and he were talking about those deals.

Q Do you have any recollection of the destination of the flight that you were describing that you thought Walto had been on?

A No. Although I do remember one specific helicopter trip. But that was just from Orange County to some hotel in Los Angeles and back. But I don't remember the date of that or the time frame that that was in.

Q And that's a different place than the one you were recalling?

A Yes, that is a different flight than the one I was recalling.

MR. ETTINGER: Could I have just a minute?

MR. BERNSTEIN: Certainly.

(Asides.)

MR. BERNSTEIN: The record should reflect that Mr. Hunt consulted with his counsel.

BY MR. BERNSTEIN:

Q Is there something you'd like to say?

could once we get the records, we can go back and look.

Q How did that arise?

A He just came to me and said, "I'd like for you to make a donation to Gary Hart anything that you feel appropriate." And I think he was going to some fund raiser and wanted to bring some checks from employees, or bring checks from people. And so I made the donation to Gary Hart. I believe it was Hart For America or something like that. But that particular instance I just felt like it was, although bold on his part to ask for a donation, because I was not even a Democrat, I did it because, as I mentioned, I was making a handsome salary and it wasn't that, $750 didn't seem to be that big of a donation for a Presidential candidate.

Then in the May time frame --

Q Before you go on let me just ask you further: Did you have an impression that Karl felt strongly that you should make a contribution?

A Oh, absolutely. There was no question on all three circumstances. It was not: Do you think this would be right? It was: I want you to make a donation. Or: I'm expecting you to make a donation.

Although I never thought that I would lose my job if I didn't make a donation. I do feel like it would have put me definitely in a negative light. And Stuart Karl

was a very volatile individual. He literally, there were people that he loved one day and would march around upstairs saying he was going to fire him the next. You just didn't want to be put in an uncomfortable position with him. It was just the way he was as a person.

Then in about the May time frame he came -- Well, okay.

Q Did you feel at that time that you were making a wholly voluntary decision to contribute?

A No. I felt at that time that I was doing it because Stuart Karl was expecting that contribution to be made. And if it had been during my days at Proctor & Gamble or Vandekamp's, the relationships I had with my superiors at those places, I would not have made a donation at all. I would have made a donation to some other candidate if I had even chose to do so.

But he was adamant and said, you know: "I want you to make a donation to Gary Hart." And he did not hide the fact at all that he was the largest single donor to Gary Hart. He had said that on a number of occasions. Everything he did, it seemed like almost all of his personal gratification came from doing something political and in particular for Gary Hart.

And so I just felt like I was really kind of pressed to make that particular contribution.

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But as I had said, he did not mention anything about reimbursement at that time. He just said: "I'm expecting you to make a contribution."

Q Did you have an impression at that time that other employees or executives were solicited?

A Yes, I do. I think that, my understanding was that he was soliciting from a number of people but that's just the impression that I got. There would have been no reason for him to single me out without going to the other people at my level and Court Shannon who was above my level.

But he did not mention: Gary, I'm going to all the executives and asking them for money. But I definitely got the impression that he was after contributions from a number of senior executives.

Q Did you have discussion with other employees and/or executives about the solicitation for the contribution?

A No, not to the best of my knowledge, I didn't.

I was a, I always was a fairly private person in that I didn't get into office gossip or the politics about the office and so it would not have been like me to go to someone else and say: Do you think this is a crummy thing for him to be doing?

I would have just made my donation and, you know, continued to work in a more harmonious environment

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than if I hadn't made the donation.

Q Did you have an impression that Stuart Karl might have considered or in fact reimbursed other employees or executives in the course of that earlier solicitation?

A No. At that time, or I should say surrounding the Hart donation, it never came up from my perspective that people were being reimbursed and it wasn't until this conversation regarding Carter that, the latter donation, that reimbursement was even a negotiable point.

Q And the Hart contribution you think took place in late 1986?

A No. I think the Hart one took place in early '86.

Q Early '86?

A Yes. I am almost certain, although I can't guarantee it, that it took place prior to the Carter For Congress which, if I remember correctly, was the first donation that I was reimbursed for.

Q Did you attend a fund-raising event in connection with the Gary Hart contribution?

A I did, but I don't know that it was in association with that contribution. But I definitely made a contribution to Gary Hart and I definitely attended a fund raiser. I just can't remember if the check that I gave was before that fund raiser or not.

Now, the check I gave was to Stuart Karl. It was not at the fund raiser that I went to.

Q Well, did you give him the check prior to the fund raiser or after?

A I can't remember that. The fund raiser was, I believe, at the Beverly Hilton or the Beverly Wilshire Hotel. There was the ex-Governor of the State, and then there was, Gary Hart stood up and it was shortly after Gary Hart announced that he would be running as a candidate for the office of the President or for the Democratic nomination.

Jane Fonda and her husband were there. David Stein was there. A number of people were there. But I can't remember if the money that I gave was in support of that or not. I can't remember if there was some other fund raiser Karl had asked me a couple of months before.

Q You believe there was some proximity in time but you're not certain exactly?

A I'm sorry. I can't remember at all.

It would not be tough to find out because when we get a copy of the check, there couldn't have been that many fund raisers at a Beverly Hills Hotel, so we could certainly match it up and see. But I just can't remember. There could have been a number of months between the check and the fund raiser. I just can't recall.

Q Did you memorialize attendance at this fund

raiser on a personal calendar or diary?

A There would have been in my files at Lorimar there would have been I feel certain something that my secretary in her calendar would have kept, because I do remember her mentioning to me: Tomorrow night you have the Gary Hart fund raiser.

So probably if they kept her files there would have been something in there.

Q Mr. Hunt, do you have any personal diaries or calendars from that period in your possession?

A I keep, not diaries, but I keep calendars and I have calendars all the way back through 1985. But as per the discussion I had with you, but I went through there and looked and found nothing of any consequence about either donations or anything in terms of fund raisers. And so I did not bring them. Although I'm certainly willing to make Xerox copies of those and send them to you at your request.

Q Let's discuss that at the conclusion of this deposition.

A Okay.

Q Did you attend any other Gary Hart fund raisers?

A Not to the best of my recollection.

Q The one that you recall at one of the hotels that you mentioned, did other Karl-Lorimar employees and/or executives attend?

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A Stuart Karl was there with his wife, Debra, and I was there with my wife Lynn, but we were the only four Lorimar employees.

Q Now please tell us about the Dave Carter contribution.

A Okay. Stuart Karl came into my office and said: "I'd like for you to donate $1,000 to a friend of mind and a guy who's a good candidate, this guy Judge Carter, David O. Carter, I believe, that's Carter For Congress."

And he said: "I'd like for you to donate a thousand dollars."

And I said: "Stuart, I have no intention at all of donating a thousand dollars to a man I don't even know, much less Congress, for a Congressional seat that has nothing to do with where I live."

And he said: "Well," he goes, "I'd like for you to make the donation and I will reimburse you for the donation tomorrow if you make the donation."

And I said: "That seems idiotic. Why don't you just make the donation yourself?"

And he said: "Well, you have to understand that I'm bound by law. I cannot donate more than a thousand dollars for any given candidate. So as such, I would like for you to make the donation and I'll reimburse you the thousand dollars."

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And I said: "Well, I don't really know about doing that or not."

He said: "Gary, let me assure you I have worked on this campaign and I know for a fact that virtually every campaign does this. This is standard course in American politics and it's really no big deal."

And he said, "There will be a number of people that will be doing this."

And so I said: "Okay."

And he said, "Rama will bring you a thousand dollars tomorrow."

So I wrote him a check for Carter For Congress, handed it to him and then within a couple of days Rama came by and handed me an envelope with ten $100 bills in it.

Something I forgot to mention was, Stuart said: "Now, Gary," he said, "One of the nice things is you will be able to write this off of your income tax, but be certain and don't put the thousand dollars back into your bank account. Use it for, like spending money, or that type of thing."

And although I didn't write the donation off on my taxes, I did follow his advice and not put the money back into my bank account.

Q So would there have been any written memorialization of your receipt of the reimbursement?

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A No.

Q Do you know where the money came from?

A Rama told me that it came from the Bank of Newport and that she had gone in there earlier that morning and had withdrawn a substantial amount of cash and was reimbursing a number of employees throughout the building.

Q Was that a corporate account? Do you know?

A I don't even know where our corporate account was kept. I couldn't tell you if that was the corporate account, although I got the distinct impression it was a personal account of Stuart, because I do know that he kept his personal account at Bank of Newport.

Q Did you attend a fund raiser in connection with that contribution?

A No, I did not. But I think there was a fund raiser and I think that Stuart wanted to bring a certain amount of money to that particular fund raiser and that was one of the reasons he solicited funds from us.

Q How many other employees or executives contributed to the Carter For Congress and were reimbursed?

A I do not know.

Q You had the impression from Rama White that --

A That it was most of the senior staff members and a number of other employees, too, but she did not mention any names, nor did she mention total, nor did I see

how many envelopes she had. I couldn't tell you if it was ten or if it was twenty-five.

Q Did your wife make a contribution?

A No, she did not.

Q Had she made a contribution to the Hart campaign?

A No.

I don't think she did. I'm almost certain she did not.

Q Did you have discussions with other executives and/or employees about the making of this contribution and the reimbursement?

A I had a discussion with Rob Bonham who felt that it was a pretty crummy thing for Stuart Karl to do and frankly I agreed with him. But other than that, I did not have any discussions at that time with any other employees.

Q At the time did you discuss the legality of the practice with anyone?

A No, I did not.

Q What other contributions, if at all,did you make to Federal candidates?

A I made a contribution for a thousand dollars for Kathlee Kennedy Townsend. And that was done on approximately the September period if I remember correctly.

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Q Of 1987?

A 1986. Stuart Karl came into my office and said, "Gary, I'd like for you to attend a fund raiser at my home and it's for Kathleen Kennedy Townsend and I'd like for you to be there and here what she has to say."

On this occasion, she, I happened to have been at the fund raiser, had the opportunity to meet Ethel Kennedy and speak with her. It was actually a kind of moving experience to have the opportunity for me to meet and talk politics with Bobby Kannedy's wife. And on the drive back to the office, Stuart said, "Gary, I'm expecting you to do the same thing on this particular donation that we did on Carter. I'd like for you to give me a check for a thousand dollars and Rama will give you a check for, she'll give you a thousand dollars in cash tomorrow."

And I guess maybe under normal circumstances I may have said no, but I think having had the opportunity to meet with Ethel Kennedy, it was such a moving experience to hear her talk about Bobby Kennedy, it was like I didn't really feel overtly like I was doing something highly illegal at the time. As a result, I gave him a check.

Q So you had not given a contribution check prior to attending the fund raiser?

A No. I am almost certain that the check that I gave was the day, I'm almost certain that the check that I

gave was the day of the fund raiser or the day after the fund raiser.

Q But you think it was afterward?

A I think it was after. I'm almost certain it was afterward.

Q And after the discussion you had with Karl?

A That's correct.

Q To whom did you give the contribution to?

A I gave it to Stuart Karl.

Q And did Rama White bring you the reimbursement?

A Yes, she did.

Q When was that?

A Within the next day or two after the check I wrote.

Q Under the same circumstances as the previous?

A Yes.

Q What other Karl-Lorimar executives and/or employees attended the Townsend fund raiser?

A There were a number of employees who attended. Rob Bonham attended, Linda Cacia attended. I think Ed Hanlon attended. Rama Middel, at that time Rama White, or maybe she was already Rama Middel at that time. She attended. Jan Benlein attended. Court Shannon. Robynne Phillipsen. John Lutgens. I think Joe Lutgens. I would say there was maybe, may have been as many as twenty or twenty-five people,

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Karl-Lorimar employees who attended that.

Q Was that in the evening?

A No. It was a luncheon.

But his home was maybe only 15 minutes from our office.

Q So everyone trooped over and then came back?

A Yes.

Q And did you have discussions about this contribution or the fund raiser or the reimbursement with other executives?

A No, I did not.

Q Did you contribute to any other Federal candidates?

A No.

Q Did you attend any other fund raisers?

A To the best of my knowledge, no.

Q Do you know of other fund raisers that employees and/or executives of Karl-Lorimar attended?

A I think there was a fund raiser for Senator Kerry. I don't know if that's hugh Kerry or the other Senator Kerry.

Q When was that?

A I don't really recall the time frame. It was in 1986, I do know that. And to the best of my recollection that's the only other fund raiser that people had the

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opportunity of attending. I did not attend that one.

Q How did you come to know about it?

A Through a discussion with Rama Middell after our departure and after one of the articles appeared in the either the MIAMI HERALD or the REGISTER. I had the opportunity of speaking with Rama on the phone casually , "Isn't this amazing?" She said, "Oh, Gary, there are so many things you have no idea happened. It's just incredible." I said, "Is that right?" And she -- I said, "You know, I feel so terrible all this stuff that's happened, you know, all of us are trying to go on with our own lives," and she said -- I said, "What else happened?" She said, "Well, there was a big deal for Senator Hugh Kerry and then there were other monies." She said, "There were just a lot of things."

And we had a brief conversation about that and talked a little bit about maybe having a reunion of all the terminated employees, that sort of thing. And that basically was the end of our conversation.

But that's how I came to know about the Hugh Kerry or the Senator Kerry, whichever Kerry it was.

Q Did you have the impression from her that Karl-Lorimar employees or exectives had contributed to that Senator's campaign?

A Yes.

Q Did you have the impression from her that they

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had been reimbursed?

A Yes.

Q Did you have any impression of how many or how much money?

A No. No.

Q Do you know are there any documents that would memorialize the solicitation of the contributions you discussed and/or the reimbursement of those contributions?

A No, other than the actual checks, the contributions themselves. Stuart Karl was, I should say this in my opinion Stuart Karl had such a manipulative mind and such a manipulative manner that he would never have put in paper or on any kind of a document something that could have been traced back to him in that regard. His mind did work such that he was highly too suspicious to do anything like that.

Q Please tell us how you came to know Douglas Rosen.

A Doug rosen was introduced to me I believe in December of 1985 at Stuart Karl's Christmas party as a very dear friend, someone who worked closely with Stuart on the Hart campaign and an independent producer of video projects and that's how I came to know Doug Rosen. Doug Rosen had frequent access to Stuart Karl both by the phone and in person and that's pretty much how I came to know him.

Q Did you have occasion in your responsibilities

in the company to have dealings with Mr. Rosen?

A No, although there were a number of people in the Production Department, E.J.Oshins or Mark Lambert, or Steve Bornstein, who would have worked with Rosen and through those people I would have indirectly been apprised of the projects that Rosen was working on, although he didn't work on many projects, certainly not bringing a large number of projects to the company.

Q What projects do you remember specifically?

A Actually I don't really remember any specific project, although I do remember that there were some. I just don't remember their names. His company at that time was a company by the name of Visual Eyes, but I can't recall the specific titles or title that he was working on.

Q Where was that located?

A I believe they're in Santa Monica.

Q Were you aware at all of any project that Mr. Rosen might have been involved in,or Karl-Lorimar, that related to the Gary Hart campaign?

A Yes. I do know that Stuart Karl had the idea of creating a Gary Hart video that would be titled something like "Gary Hart, the Man" or "Gary Hart, the Candidate." It would be a 20 to 30-minute video that explained Gary Hart's strategy, maybe a speech or two by Gary Hart. And I can even remember a couple of video cassettes with a handwritten note

from Gary Hart on Stuart's desk, that talked about "Please review these speeches," et cetera, et cetera. And I think that he was referring to review them for possible use in the video, or to give him tips or whatever.

Stuart Karl one time brought me into his office or called me in his office and asked what I thought of the idea. And --

Q What was the idea?

A The idea was the video, "Gary Hart, the Candidate," to bring a video, to either give it to video stores for people to rent or to give away for, you know, a Gary Hart thing that you can take home and listen to. Or to sell it for cost, which would have been just several dollars, actually, at video stores. And Stuart said, "What do you think about the possibility of doing that??

And I said, "You know, unfortunately I think it's a very novel idea but I don't think it has any practical application. I don't really think it would be received well in the marketplace and may even be a negative."

And that's the last I ever heard of that particular project. And I think actually the project was shelved very shortly after that. I don't know if it was because of my opinion, but coincidentally it just never really panned out.

Q When did you have that discussion with Stuart

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Karl?

A I would say that it probably, most probably was in the May-June 1986 time frame and probably more towards -- I'm sorry -- March to June, and probably more towards the March time frame than the June time frame.

Q To your knowledge, what if anything had been done on that project?

A Actually to my knowledge no work had ever been done on it. It was just in the idea stage.

Q Do you know of any business relationship the company might have had with Gary Hart or the Hart Campaign for this project?

A No, I do not know of any, and if there had been, it would have been E. J. Oshins or Mark Lambert, and probably E. J. Oshins would have been the person who would have been working on putting it together. Most of her responsibility involved seeing projects from their inception through final completion,where Steve Bornstein normally bought existing products, that already existed.

Q To your knowledge, did Douglas Rosen have any involvement in the Hart Campaign?

A Stuart one time on a plane trip with Doug Rosen and Stuart, Stuart mentioned that Doug had been a ranking member of the Hart '84 Campaign and was still very concerned about Gary Hart getting the Democratic nomination.

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He did not mention anything about him being an officer of any sort in the current campaign Gary Hart was working on.

Q When did that take place?

A Well, let's see. That would have been in the latter half of 1986. And it was from Tetterboro, New Jer -- It would have been one of the flights originating Tetterboro, New Jersey, on the way back to Orange County, because I remember that we were in Tetterboro when Doug met us at the airport and we were flying back home. It was a one-way for him.

Q What was in Tetterboro?

A Actually a private jet center for most of the New York Metroplex. Most people fly into Tetterborn with private planes because Kennedy and LaGuardia don't have good facilities for private planes.

Q So Tetterboro would be for flights to New York City?

A That's correct. And then just go across G W Bridge or one of those bridges. I can't remember which one. I think George Washington Bridge or 59th Street. I don't remember exactly which one. But it's right, it's not very far from the city.

Q Did Mr. Rosen visit Karl-Lorimar?

A Yes, he did.

Q How much time did he spend there?

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A I would say Doug was at the office at least monthly and probably maybe two days a month, to the best of my recollection.

Q Did he have an office?

A No, he did not.

Q What did he do there, to your knowledge?

A He would meet with Stuart and other than meeting with Stuart, I'm not really exactly certain who else he would meet with or what discussions were taking place.

I do know that he called frequently. I was in Stuart Karl's office on a number of occasions when Rama said, "Stuart, Doug's on the phone." Most of the time Stuart would take the call. Sometimes he wouldn't.

Q When would this have been? What time period?

A The entire period that I was there from December until, of '85, until March of '87.

Q On a regular basis?

A Pretty much on a regular basis.

Q Did you have an impression about what their relationship involved?

A Actually I seem to recall it being mostly personal and Hart related and business related would be a smaller portion of it. But that was just my own perception. I don't remember actively talking about projects on a regular basis. They talked about Doug Rosen's courses that he ran.

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They talked about Doug's dad a lot. Doug's dad was the guy that convinced Calvin Klein to put his autograph on the back of blue jeans. They talked about a number of other personal-type things but really nothing -- and they talked about a number of Hart things, but they didn't really talk about -- I don't remember them talking a lot about video projects, per se.

Q Who else in the company would have been responsible, would have had responsibility for these video projects?

A That Doug Rosen would have been working on?

Q Yes.

A Let's see. If they were in the negotiation phase it would have been Neal Baseman. He would have been working on the time tracks. If any of the advances had gone out, it would have been Neal Baseman and E. J. Oshins. If no advances had gone out and it was just in the creative phase, it probably would have been E. J. Oshins. Maybe Mark Lambert.

Q Please relate if you can the meetings that you remember that involved the Hart Campaign in one way or another.

A I remember one meeting with Doug Rosen, with Stuart Karl in his office and Stuart Karl had just gotten a bumper sticker that said "Honk if Gary Hart Owes You Money."

And they were laughing about that. And Stuart mentioned something about the fact that some woman reporter had contacted Stuart and said, "I think that you've donated too much money." As a matter of fact there was something about $90,000. I remember Stuart saying something about a $90,000 figure. This woman had uncovered that and Stuart was really worried about that and had hired some attorney from the Bay Area, actually had hired a man already, some attorney from the Bay Area who specialized in that type of thing, to look into dealing with that and dealing with this woman. And I remember Doug saying, you know, well, what was it about -- excuse me -- what else was she talking about. It seemed more than just casual interest or concern for a friend. And I got the general impression that maybe Doug had done some of that, also, and that he was maybe afraid that that would maybe lead to him. It was, you know, intuitive speculation on my part, but having been sales manager for ten years and most of my time spent trying to read people in that capacity, it certainly seemed that he was overtly worried, from my own perspective.

And then the only other time they talked --

Q I'm sorry. When was that?

A That meeting would have been mid -- part of the Fall of 1986.

And then I think in the late --

Q I'm sorry for interrupting.

You were in attendance at this meeting?

A Yes, I was. I happened to have been in Stuart's office at the time that Doug came in and we had the conversation. He was having a conversation in front of me.

You have to understand that that was not unlike Stuart Karl. Stuart Karl was a highly, highly ego-motivated man. To him, having spent $90,000 on a candidate would not have been a source of embarrassment because he broke the law, now that I've found out. But more the fact that it would have been a way of saying, "Hey, I'm an important rich person. See, I can give $90,000 to somebody even though I can only write off a thousand dollars on my income tax."

So, having that conversation with Doug Rosen in front of me, I think was more done to kind of, how is the phrase, self-aggrandizement. He had, you know, tried to build himself up through saying those types of things.

He had, you know, tried to build himself that way. So a normal person would have said: "Gary, would you please excuse Doug and I," and proceeded to have a conversation. But Stuart was not that type.

Then one time on a Lear jet --

Q Let me ask you one more question about that.

Were there other instances you can recall

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where you and/or other employees or executives were conferring with Mr. Karl and had left the room when it appeared that he and Mr. Rosen wanted to confer?

A No, I cannot recall that although I think Court Shannon would be more likely than I, because his office was almost adjacent to Stuart Karl's and he was in Stuart's office on frequent occasions. Although I do remember instances where Stuart waited for me to leave the office or said, "Well, Gary, I've got something to do," when Doug was in the office. But he never, I don't recall him saying, "Please leave so Doug and I can discuss something."

Q Please go on. I think you were going to relate another meeting or another communication.

A I was on a Lear jet between Tetterboro, New Jersey, and Orange County, California, and on the plane, to the best of my recollection, was Doug Rosen and myself, Stuart Karl, maybe Court Shannon, and Jeff Jenest. I think there were five people and I think the other two members were Shannon and Jenest, but I can't say that for a fact.

And I'm not certain if you've ever been on a Lear jet or not, but it's not tough to hear other people's conversations, even if you are not intending to.

Q It is relatively small.

A It's very small. The seat itself is smaller than a coach. It would be certainly no larger than a coach

seat would be and the four people in the back would be close enough to where their knees would be touching if they didn't move them out of the way.

I was sitting in the seat facing the rear of the airplane on the co-pilot's side. Doug Rosen was next to me. And Stuart Karl was in the bench seat along the back on the pilot's side. So we formed sort of a triangle.

Q When did this flight take place?

A I think it took place, if I remember correctly it was cool in New York so that would have been late September, October, maybe November, of 1986.

Q What business had you had in New York?

A I think at that time I was trying to close a contract with Warner Communications, meeting with Lee Rodgers, President of Warner, on getting him to distribute our products into magazine racks. But I could certainly, if I had access to my files, I could certainly go back and determine exactly why I was there. But I think that was -- and that may be in my calendar. I may be able to find out who I was seeing at that time.

So I was in New York. Stuart, I don't recall why he was in New York. And, let's see, I would have to be able to look at the charter slip itself, but that may actually have been the trip we made to Washington, D.C., to have met with what Gary Hart called The Inner Circle.

were a lot of, that there were a lot of people within the company who had made donations and got reimbursed for those.

Q He didn't actually say that?

A No, he did not.

Q Do you remember as best you can the words that he used?

A I just think he said something like, he didn't say, "I'm happy to report," but he said something to the effect that, you know, "I'm glad now that there's a large number of Karl-Lorimar employees who are active, have actively donated to Gary Hart Congressional, the Gary Hart race, or candidacy," and Doug Rosen said, "Well, I'm not certain that, you know, I want to know about that" or "I don't really think it's appropriate to talk about that."

I can't really remember the exact conversation because even though you're close and you can hear it, I wasn't really paying attention. But they definitely were talking about Gary Hart. They definitely talked about the Democratic Convention. They definitely talked about Karl-Lorimar employees who were donating money, and at that moment in time Doug Rosen said something that ended the conversation and I got the general impression that Doug was smart enough to realize that we were in this small plane and that everything that everything they were saying was being heard by everybody else there unless they were asleep. That was

not unusual for people to sleep on the way back. We normally didn't leave New York until late.

Q You got the impression that this was news to him but that he didn't want to talk about it?

A That is the impression that I got, yes.

Q In that conversation had Karl actually mentioned the amount that he had spent regarding the Convention?

A The figure 27 to 30 thousand dollars came up in that particular conversation which was different than the $90,000 that he had referred to in his office that somebody had uncovered or that he had made some contribution in that regard, and I don't know if the ninety thousand was to the Convention and was incremental to the twenty-seven to thirty, or if that twenty-seven and thirty was part of the ninety, I don't really know.

Q Do you know why Rosen was on the plane?

A I do not know why he was on the plane other than -- I know why he was on the plane. I do not know why he was in New York. He was on the plane because we were coming home and he needed a ride and it was not unusual for Stuart to give friends rides if there was an empty seat.

Q I think you were about to describe another flight that related to the Hart people?

A There was a flight, we left Orange County and flew to Washington National Airport, spent the night at the

Intercontinental Hotel in D.C., and then the next morning Stuart Karl had what he called an Inner Circle meeting with Gary Hart and -- It was Gary Hart's Inner Circle regarding the marketing of Gary Hart and what he would do and how they would do it and all that.

We hung around the Capitol for a day waiting for Stuart to finish, picked him up, actually we dropped him off that morning at the Senatorial office and then picked him up and then we all flew to Tetterboro, and if I remember correctly, the plane went back and picked up Gary Hart on that trip and took him to New York or some place, and then came back, picked us up and flew us home.

Stuart Karl told me that that's what they were going to do and I remember him saying something to the pilot about that.

Q You're saying that the plane brought you to Tetterboro and then returned to Washington and brought Gary Hart to Tetterboro?

A Yes. I don't know what happened but to the best of my recollection that was the trip that Stuart Karl said, "Now, tomorrow morning you'll go back, pick up Gary Hart," and I don't know if they flew him to Denver and then came back and picked us up or they flew him to New York, or what they did but I definitely remember, I seem to remember that that was the trip that the pilots made another stop and

did something with Gary Hart.

Q When was that trip?

A That would also have been sometime after June in 1986.

Q The flight you were describing earlier I think you said was late in 1986; is that right?

A Yes. What I'm saying is that I don't know if that was the flight that Rosen was on or not. If it was, then that would have been the same period of time, but I think this was a different trip.

Q Do you know if it was an earlier trip or a later trip?

A I think it was an earlier trip. I think the Rosen trip was the latter one because I remember being cold in New York, but I don't remember it being particularly cold in Washington, D.C., although I remember it being real windy and everything, but I don't remember it being cold. That's why I think that may have been in July or August. And then the Doug Rosen trip I think one like I think in October.

Q Do you remember it being very hot in Washington, D.C. If you were there in July.

A I don't remember it being particularly hot.

Like I said, if you can get the documents from Martin Aviation, I'd be happy to sit down and on every one that I was on, I could probably recall just from where we

stopped, because my memory is good enough to recall different places where we were refueled and stuff like that that I can normally place the trip.

Q We have some of those documents and following these questions, what I think we'd like to do is to take a short break and I'll organize those materials and review them with you.

A Okay.

Q And try to nail that down.

A Sure.

Q Let me ask you generally: Did you -- strike that.

Going back to the flight you just described that was to Washington, D.C., and where Hart was transported somewhere, you said it was in connection with a meeting of the Hart Inner Circle?

A Yes.

Q And do you know who was part of that Inner Circle?

A No. No, I do not.

Q Do you know where the meeting took place?

A Yes. It took place in his Senatorial office, or in the building that his Senatorial office was in.

Q So Karl was a part of this Inner Circle?

A Yes, he was. He had mentioned to me that at

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one time he was in the close but Outer Circle and that he had been moved into the Inner Circle.

Q Did he say when that was?

A No, I don't remember when that was.

Q Did you have an impression of what took place at that meeting?

A I got the impression that they were outlining a general marketing strategy for what Gary Hart would do, where he would go, key cities he would stop, and also fund raising.

Side 4

Q Were you frequently transported by airplane or helicopter in connection with your employment?

A Maybe if I could outline when I was and you could determine if it was frequent or not.

I would say I went on a private jet in my 15 months there probably 20 or 22 times and helicopter I was probably on a helicopter maybe 15 times.

Q What would have been the purpose of the helicopter trips?

A It would have been taking us to, it would have been taking us to a meeting in Culver City during rush hour traffic so instead of driving we would go from Orange County Airport to Santa Monica Airport and then be picked up there by car, shuttled to the lot. Or it would have been taking me from Orange County Airport to L.A. to make a flight .

Q And how about the airplane transportation?

A The airplane transportation normally was done in conjunction with Stuart Karl's travel or if I had a major project going on that required me to be in cities to where I couldn't effectively do it with commercial travel.

Q Was that equally true of the other top executives of Karl-Lorimar?

A Yes, I think it was, although I think I traveled more frequently by private charter than they did only because of the nature of my job.

Q You described one Lear jet flight that Doug Rosen was on with you. Were there any others?

A I seem to recall Doug being on one other but I can't recall that specifically.

Q Do you have any recollection about when such a flight was?

A No, I'm sorry. I can't recall. I just seem to remember Doug being on a couple of the flights, but the only one I can really recall is the conversation and that only, I was only kind of aware of, I only remember that really because I can recall that being the time that Stuart talked about how much money Doug's dad had made. I just kind of remembered that particular flight.

Q Were you on any private flights where Senator Hart was transported as well?

A No.

Q Did you have an impression that Senator Hart was being transported on any occasions?

A Yes. Stuart Karl told me that he was.

Q Do you know how many occasions?

A I remember specifically three occasions, but I don't remember any more than that.

Q Do you remember the approximate dates?

A No, but I can tell you where they went. I can't tell you the dates. I remember one time Gary Hart was in New York City and needed to be transported back to Washington, D.C. and the jet that we had brought for some reason the, one of the engines wouldn't start. And Stuart then had to charter a Saberliner from the Tetterboro, from the charter company there in Tetterboro to fly Hart down to D.C.

And then I recall one trip where Gary and his wife, Lee, were flown from Washington, D.C., --

Q I'm sorry. I want to stop you for a second.

Do you know from what company the charter --

A No, I'm sorry, I don't.

Q The Saberliner is a type of aircraft?

A Saberliner is a type of jet.

Q So at that point was this --strike that.

Were you in New York City?

A We were in New York City and my guess is that

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it was probably January or February of 1986 because there's only one reason a jet engine is not going to start and that's because if there is some unusually cold, cold weather. And I seem to remember it being cold when it happened.

Q And Stuart Karl told you that --

A He was saying how embarrassing it was that they couldn't get the engine started and so they had to get a Saberliner and take Gary up or whatever the case was, but I definitely remember that the jet was chartered from that company there in Tetterboro.

And you can find out whoever the company was that we would stop and would take care of our re-fueling and all that, was probably the company they chartered the jet from, also.

Q Would that have been billed to Martin Aviation?

A Could very well have been. It very well may have been. There's a lot of reciprocal agreements with companies.

There are three key names here that you guys may want to, and you may already have them. The three pilots that transported us almost exclusively, Phil Amsden, A-m-s-d-e-n. He was the chief pilot of Martin Aviation.

Gary O'Dell and Ken Gibson.

I can almost guarantee you that any time a Stuart Karl plane was chartered, one of those three guys

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would have either been pilot or co-pilot.

Q These are the jets, not the helicopters?

A These are the jets.

The helicopter was a guy by the name of Doug something. He was the one that flew us almost exclusively in the helicopter.

Q Okay. You just described an instance in what you thought was January-February 1986?

A Right.

Then I remember Gary and Lee being picked up, Stuart saying that he was going to fly Gary and Lee back to Denver from Washington, D.C., and I can't remember the date of that.

And then I also remember Gary and Lee being flown, Stuart telling me that Gary and Lee were being flown from Orange County to Denver.

Q How did this come up?

A I don't remember. We would be talking about something and he would say, oh, that, you know -- I can't even remember how it would come up, but it would come up through the natural course of conversation.

Once again, if you remember how I described Stuart's personality, it would not have been unusual for him just to bring it up kind of overtly.

Then where were trips that when Doug Rosen was

campaign manager, I know that he made, Stewart talked about flying him from the Democratic National Convention in San Francisco back down to Orange County. I don't know if that matters or not.

Q When was that?

A '84 campaign, Convention.

Q This was something Karl had talked about although obviously you came on at the company much later?

A After. That's right. Stuart had told me about that particular trip.

Q And your best recollection -- What was your best recollection about what he told you?

A Nothing other than the fact that he said, you know, what a wild time they had and it was just fantastic and that he and Rosen and some woman Rosen was with and Stuart Karl and Debbie Karl had flown back and then Stuart told me that on several occasions that he had flown Makay Danes and Dennis Walto on the helicopter up to L.A.X. or to some meeting or something up in L.A. Because he remembered what a funny guy Makay Danes was. And I can remember him saying, "We were flying in the helicopter and Makay Danes was cracking these jokes and stuff." And that time --

Q Do you have an impression of the number of occasions that took place?

A Two or three.

Q Is that the extent of your recollection about when Rosen was transported?

A Um-hm. I'm sorry, yes. And that is while he was working on the Hart campaign. I don't know that Doug Rosen's tips with us after the fact, which would have been after December of '85, if he was doing anything for the Hart campaign when he was in New York or not. That would only be -- I just don't know.

Q Did Stuart Karl tell you when he related the incidences where Senator Hart had been transported what the purpose of that was?

A No, he did not.

But it was implied that it was just a favor to get them back to their location without having to go commercially.

Q You would have no way of knowing what activities if any Senator Hart was engaged in at the time or not?

A No.

Q What I'd like to do now if I can is to read you some more names but not as many as last time.

(Asides.)

Do you recognize the name of William or Bill Dixon?

A No.

Q How about Keith Glazer?

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A Keith Glazer, I have heard of Keith Glazer but I do not recall in what, definitely some business or personal relationship with Stuart Karl, but I don't recall which one.

Q How about Michael Moore?

A No.

Q How about Bernard Snyder?

A Bernie Snyder was, is an attorney for the law firm of Buchalter Niemer, and is a close personal friend of Stuart Karl's. And also, Stuart Karl mentioned to me was actively working with the Hart campaign.

Q How about William or Bill Shore?

A No. No. No.

Q How about Beth Smith?

A Kind of like a fake name. No, I have never heard of Beth Smith.

Q David Stein?

A David Stein is a well known Orange County developer, a good friend of Stuart Karl's and one of the two or three men in Orange County who had, Stuart Karl had said had made up their mind to solicit large donations, maybe I should say solicit large amounts of money to help the Democratic Party in Orange County be established.

Stein, Rosen and Stuart Karl were close whenever I happened to see the three of them together, it always

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seemed like those three were friends.

Q And they had politics in common?

A Yes,they did.

Q Campaign activity in common?

A Yes, they did. David Stein was a Hart fund-raiser that I had mentioned earlier.

Q Did Stein ever attend meetings at the company?

A I can't recall Dave Stein was ever at the company or not. Court Shannon could answer that.

Q To your knowledge, Stein didn't have a business relation with Karl-Lorimar; did he?

A No, not to my knowledge. He did not have a business relationship with Karl-Lorimar.

Q Do you recognize the name of Christopher or Chris Townsend?

A No.

MR. BERNSTEIN: Off the record for a minute.

(Discussion off the record.)

(Recess.)

(Whereupon, a luncheon break was taken from 12:08 p.m. to 1:06 p.m.)

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AFTERNOON SESSION

1:06 p.m.

MR. BERNSTEIN: Back on the record.

And at this point, Mr. Hunt, what I'd like to do it to show you a series, about fifteen or so, flight logs and invoices, private transportation that was provided to Mr. Karl and other people by Martin Aviation and also other charter companies Martin Aviation did business with.

And why don't we just get started?

And as to each of them I'd just like you to see if it refreshes your recollection and if you have any personal knowledge as to who was on the flight and what took place.

THE WITNESS: Okay.

(Pause.)

MR. BERNSTEIN: And we wll mark these as exhibits to the deposition as we go.

(Asides.)

BY MR. BERNSTEIN:

Q Mr. Hunt, I wonder if you would look at what I've just now handed to you which is a Flight Log prepared by Martin Aviation dated February 6, 1986, and that apparently is the date the flight took place.

And are you familiar with this Flight Log, or is this a new form to you?

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A This is a new form to me.

Q So what you may be familiar with, if you'd turn to the next page --

A Is the next page.

Q An invoice.

A Yes.

Q Whichever you'd like to look at, let me just point out that on the Flight Lot itself it indicates that Mr. Doug Rosen and Mr. Steve Rivers were passengers. And that's indicated, as well, on the Invoice.

A Correct.

Q And I wonder if you can shed any light on this particular flight, Mr. Hunt?

A Umm. Well, let's see. Is SMO Santa Monica Airport?

Q I believe it is.

A No, this does not, I cannot tell you what this was, what this would have been for.

Q Okay. Why don't you hand it back to me and we'll mark this FEC Exhibit No. 2.

(The document referred to was marked FEC Exhibit No. 2 for identification.)

BY MR. BERNSTEIN:

Q As you will see as we go, Mr. Hunt, destina-

tions are indicated on the Flight Log and the Invoices by the three-digit letter that represents the airport, some of which we've been able to figure out, some not. And maybe you can help us with that, as well.

A Sure.

Q The next one that I have handed you is a Flight Log dated for the periods February 11,12 and 13, 1986, and indicating in the notes at the lower right-hand portion of the first page an instruction which seems to be to the effect of: Pick up Gary Hunt in --

A Salt Lake City.

Q -- Salt Lake City, SLC.

A That's correct.

Q Can you piece together what this flight was about?

A Let's see we went from Salt Lake City to Tetterboro. I was on vacation in Salt Lake City at the time and this was 1986. Let me just see. This was a Falcon 50. Yes. Aircraft 841F, Falcon 50.

Q What does that mean?

A That's the type of jet and I remember this particular trip by that.

I was on the portion from Salt Lake City to Tetterboro only. Tetterboro to DC and DC to Santa Ana, I was not on that portion. So unfortunately I cannot comment

on that other than the fact that I know that on the Salt Lake City, excuse me,the Salt Lake City to Tetterboro portion was Stuart Karl, George Unwin -- Maybe I'm telling you stuff that's already on here.

Q Yes.

A Stuart Karl, George Unwin -- I'm sorry. Stuart Karl, George, Dale Unvert, he's a doctor. George Karl.

Q George Karl is Stuart Karl's father?

A His dad. Alison Weir and Mark Lambert.

Those were the people on this particular flight.

And I do not know what happened after being dropped off in Tetterboro. I caught a commercial flight home after that.

Q Why were you going to Tetterboro?

A I had business with the Toy Fair that happens that two-week period every year in New York City and we had a number of children's video tapes that we were trying to close distribution in a number of toy stores.

Q The itinerary, if you can follow me on the Flight Log seems to indicate that it was anticipated that the same number of passengers who flew from Salt Lake City to Tetterboro would continue on to DC.

Does that make any sense

A It would not have been unlike Stuart Karl to be the type of person, and once again this is my opinion, to

say Mr. Karl and six others, letting company officials think it was six other company employees and then maybe he would pick someone up in New York and they would fly Gary Hunt or other company employees on the balance of the trip. So that was in effect the opportunity to hide that. I don't know that that's what he did. It certainly seems well within his ability.

Q Do you know for what purpose or for what reason the flight would have continued on to Washington?

A There was no business reason it would have continued on to Washington.

Q Did Mr. Karl frequent Washington for pleasure?

A As in vacation?

Q Yes.

A No.

Q Would you infer that it was for some campaign-related purpose?

A Probably.

Q But that's by a process of elimination pretty much?

A That's correct.

I do know that Stuart Karl's dad was on the plane to be dropped off at his daughter's home, which is in New York. So they were staying in New York. He was to be ferried to New York. There would have been no reason to take

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the Falcon 50 to Washington, D.C., for any reason other than to pick up a large number of people, because under normal circumstances we would have ridden in a Lear 35, which is a much smaller, and correspondingly you can probably tell, much less expensive airplane to take.

Q So you have no way of knowing or you don't know who was on that return flight from Washington to Orange County?

A No, I do not.

MR. BERNSTEIN: Let me say I think probably the better way to describe these for the purpose of the record is that each Flight Log actually has a specific number. This Flight Log number is 7797. So we will mark this as FEC Exhibit 3.

(The document referred to was marked FEC Exhibit No. 3 for identification.)

THE WITNESS: Now, I have always understood that a log must be kept of all the passengers on each individual segment of a flight. Martin Aviation did not have any record of that.

MR. BERNSTEIN: Well, I guess what we can say is that you have in front of you what we had before us.

THE WITNESS: Well, the reason I ask that is it was customary for the pilot to look and say, "I need a

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name and spelling of all the people in the airplane." Now, whether that's thrown away thereafter. Or maybe Mr. Ramsden or Mr. O'Dell would have kept those in some personal diary, I couldn't answer, but I do know that one time they told me that the pilot in command has the responsibility of knowing the names of every passenger on each segment of the flight. In the event the plane crashes, that's how next of kin are notified and authorities are notified.

BY MR. BERNSTEIN:

Q The next Flight Log and invoice that I handed you is Flight Lot No. 7923 and this is one that involved travel in the period February 20th to February 22d in 1986. And on the face of it it appears to show travel from Orange County to Denver and back.

A Yes.

Stuart on this particular one had asked if there was anything I needed to do in Denver because he was having to go to Denver and to work to do something with the Gary Hart campaign. He did not say what it was that he was doing. But I do definitely remember this was the trip that he had asked me if there was anything that I needed to do in Denver that I could accompany him, because he was going to have to go work on the Hart campaign.

Q Did you accompany him?

A No, I did not.

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Q But you remember clearly that he asked you?
A He asked me, yes.
Q Did he have any business reason to travel to Denver?
A Normally no.
Q Do you know if he traveled there for pleasure?
A No. To the best of my knowledge, no.
Q To the best of your knowledge he didn't travel there for pleasure?
A He did not travel there for pleasure.
Q Let me point out that on the Flight Log itself when the different legs are described with the number of passengers that it indicates one passenger going to Denver and three passengers returning.
A Okay.
Q Do you have any knowledge about who those other people were?
A No, I do not.
Q Your feeling is that the pilot would certainly know?
A He would have known. I don't know if those records are kept. But you will find Phil Ramsden, who happens to have been the pilot in command on this particular flight, is a very intelligent and articulate guy and I'm certain that he remembers at least to some degree, certainly

he would remember if he flew Gary Hart anywhere.

Q Can I ask you this: Although I understand that this Flight Log form is not a form that is familiar to you, would you assume, can you tell us, that some of the information on this is indeed filled out by the pilot him or her self? Do you assume?

A Yes. It would have to, because if you look down here, line 1, 2, 3, 4, 5, 6, 7, 8 -- under PAX, they're talking about certer of gravity location, center of gravity limits on Leg 1, 2, and 3, the TOW, I think that's the total weight. Those are things that only a pilot would know and the pilot certainly would have filled out that section of it. I suspect the financial part of it is filled out, the top right-hand box, that's done by the accounting department.

But under like each leg, down here, these are all instruments that the pilot is reading off of, the HOBBS, Takeoff and Landing, Takeoff and Landing in the Block. And all that stuff that somebody at Martin Aviation behind a desk wouldn't have been able to fill that out.

Q So the pilot then would be quite familiar with this form and indeed is responsible for completing a fair amount of it?

A Absolutely. As a matter of fact he signs the fact that it's air-worthy. This is his actual air-worthiness check. Including the number of passengers.

(415) 597-5558

Q Can you try to explain again your best recollection of the purpose for which Stuart Karl told you he was going to Denver?

A I would like to be able to recall. Unfortunately I can't, other than the fact that he said he was going to work on some Gary Hart campaign activities. I don't recall -- Normally when he went to Denver, he met with Gary Hart, but I don't recall if on this particular trip he indeed did that or not.

Q And do you have a recollection of this conversation -- Do you have a recollection if in this period of time Mr. Karl came to you and proposed it?

A I definitely remember it because it was shortly after we arrived back in Orange County from being in, at the Toy Fair where he went, and I can remember him saying, "Isn't there some reason you need to go to Denver?" I can remember thinking at the time, "This is great. The President of the company wants to know if I can generate some reason to go to Denver so I can accompany him on a private jet."

You have to remember I had only been with the company at this moment in time ten, twelve weeks, so a lot of this stuff was still so new and so novel to me it had a much bigger impression than it would have later on during my career.

Q Why did he want you to accompany him?

9 5 0 4 3 5 9 8 2 5 9

A Because he like to be with people, hated to be alone. You know, he was the kind of person that,even his hotel rooms,would have somebody sit up with him and talk until midnight or one or two when he was ready to go to bed.

MR. BERNSTEIN: This then is Exhibit No., FEC Exhibit No. 4 to the deposition.

(The document referred to was marked Exhibit FEC No. 4 for identification.)

BY MR. BERNSTEIN:

Q The next one, Mr. Hunt, is Flight Log No. 8136, which was travel for the period of March 10, 11 and 12, 1986, and indicates travel to Cincinnati, I believe.

A Well, actually what happened was there were tornadoes over Cincinnati and so we couldn't land. This was the trip where there was heavy winds and Washington, D.C., that I referred to, that we dropped Stuart Carl off and he had the Inner Circle meeting with the Gary Hart people.

Q I should tell you that I believe there may be one or two other flights to Washington, so I want you to try to be as sure as you can about what this particular flight was about.

A Well, maybe I should wait, but I definitely remember, yeah, and as we go through here, you can see what happened . Leg No. 1, instead of going from SNA to Cincinnati,

took us from Santa Ana to Salina, Kansas, which is where we stopped normally when we were going to the East Coast. That's under Leg No. 1, SLN. And then we went straight to D.C.

Q Would Mr. Karl have had business in Cincinnati?

A We were going to be meeting with the Procter & Gamble Company on doing a sponsored video and then we were going to have to get up the next morning and leave very, very early to get him to Washington, D.C.

Q And your recollection is that this was the trip to Washington for meeting with Senator Hart?

A Yes, I do.

Q And this was the Inner Circle meeting you described earlier?

A Yes. And let me say that to the best of my recollection, I was only on one trip that took us to Washington, D.C. and I definitely remember being on the plane that didn't, where we couldn't land in Cincinnati, so just by a process of elimination, I am saying that I'm almost certain this has to be that particular occasion. And I think in our notes I thought it may have been in the summer or fall, but it looks like it's March.

Q In March it's not too hot and not too cold in Washington.

A Right.

Q Now again, I'm not sure if you related earlier

who were the other passengers to Washington?

A Let's see. I thought it was Stuart Karl, Court Shannon, Mark Lambert, possibly Jeff Jenest and myself, but I can't recall that for a fact, how many people there were. Oh, here we have four passengers. That would have been Stuart Karl, myself, Mark Lambert, I definitely know was on the flight. And I think maybe Court Shannon, because I remember going to the Museum of Air, Flight Museum, Aero Space, Mark Lambert and I, we were talking about a couple of things. I just don't remember who the fourth person was.

Q And why were you present on this flight?

A We were going to New York, actually -- Well, originally we were going to Cincinnati and I was going to be making a presentation to P-G, but my pressing business was in New York, and I don't remember exactly what it was. It was not unusual for me to be in New York on a regular occasion. That was such a large piece of responsibility for us, we had a lot of suppliers there and distributors. But I was on the flight originally because of the Procter & Gamble meeting.

Q And if the dates are indicated correctly on this form, does that mean that the Inner Circle meeting you were describing must have taken place on the 10th of March?

A Let's see. It would have taken place on March 11 because we took off from -- I'm sorry. On the

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10th because we took off from Tetterboro, from Washington, D.C., let's see, 2107 would be --

Q In the evening?

A In the evening, 7:00 o'clock. Okay. That would have been about right, because we killed most of the day in Washington, D.C., and picked Stuart up --

Q Well, let's leave it at this: The meeting you described took place on either the 10th or 11th of March.

A That's correct.

Q At any rate, you said your business was in New York and that accounts for the subsequent leg from Washington to Tetterboro?

A That's correct.

Q And everyone who had gone with you accompanied you?

A That's correct.

Q And would you know who might have, the additional two people indicated who might have come back from Tetterboro?

A Well, let's see. (Pause) Unless maybe that was Doug Rosen. This could be the trip where Rosen was on. I can't think of who else would have been, who else would have been on the flight.

Q I'm asking only if you, you know, if this refreshes your recollection about who --

A No. I'm sorry.

Q Can you tell me, parenthetically, was this the ordinary course for you to make phone calls from these trips?

A Yes.

Q We can go on to the next one.

A Okay.

MR. BERNSTEIN: The flight we have just been discussing is FEC Exhibit No. 5.

(The document referred to was marked Exhibit FEC No. 5 for identification.)

BY MR. BERNSTEIN:

Q This next one is Flight Log No. 8170.

It indicates under, if you follow me, the line for passengers, it reads: "Senator Gary Hart plus four." And it appears to have been a flight from Santa Ana, that is Orange County --

A That's correct.

Q -- to Santa Monica and return.

There also is a somewhat cryptic note which indicates pick-up at SMO, Senator Gary Hart.

Would you have any personal knowledge of this that was relayed to you by Stuart Karl?

A No, I would not, unless this may have referred

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to the, unless this could have referred to the fund-raiser Gary Hart had in Beverly Hills. I couldn't even speculate why he would have gone to Santa Monica and back. That is the airport that we flew into whenever we went up and met with the parent, but I wouldn't have any reason to know why he would have been there.

Q Okay. Thank you.

MR. BERNSTEIN: This then is FEC Exhibit No. 6.

(The document referred to was marked FEC Exhibit No. 6 for identification.)

BY MR. BERNSTEIN:

Q This is Flight Log No. 8406. In the passengers on this flight it indicates Mr. Stuart Karl, Mr. Court Shannon, Jeff Jenest, Mr. Gary Hunt, and then it indicates that there were three additional unnamed passengers, and this was a flight, I believe SFO stands for San Francisco?

A Um-hm.

Q Santa Ana to San Francisco and return.

A Um-hm.

Q Would you have a recollection of this flight?

A I do. This was a meeting we had with an advertising agency and I can't recall their name but we were giving a presentation. They are the advertising agency for the Beatrice Company, Hunt & Wesson Division in particular.

Ketchum Advertising. And we had flown up to make the presentation to Ketchum and that's what this was. It was a business --

Q So this had nothing to do with the campaign?

A No, it didn't. And I don't know who the other two people were that we brought back unless someone had flown up commercially and met us and then we brought them back home.

Q Okay. Thank you, Mr. Hunt.

MR. BERNSTEIN: This then is Exhibit No. 7.

(The document referred to was marked FEC Exhibit No. 7 for identification.)

BY MR. BERNSTEIN:

Q Next is Flight Log No. 8522, which is a flight on April 15 through 18, 1986, which was again to Tetterboro, Washington, back and forth, back and forth a few times.

A Right.

Q The passengers indicated are Stuart Karl, Gary Hunt, Shannon and Jeff Jenest.

What can you tell us about this one?

A Well, let's see. I can only tell you that to the best of my recollection that I was only on this flight from Santa Ana to Tetterboro and departed Tetterboro because then down here where it goes to D.C., back to Tetterboro,

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back to D.C., and then to YNG, wherever that is. Is this Youngstown?

Q Yes, I believe it is.

A Okay. Let me see. I may have been on everything except the -- there were six people coming back from Youngstown.

Yeah.

The plane -- I don't know who was on Leg No. 4, 5 and 6.

Q You are referring now to?

A The DC to Tetterboro -- I'm sorry. Leg 3, 4, 5 and 6. Tetterboro to D.C. back to Tetterboro back to D.C.

But I do know that the Passenger No. 1 could not have been Stuart Karl on Line No. 6 because I recall, you see here, on page No. 2 where it says "D.C. to Tetterboro passengers none"?

Q Yes.

A Stuart Karl was at Tetterboro Airport with me Jeff Jenest and Court Shannon. We then flew to Youngstown, Ohio, and picked up two priest who were at that time Stuart Karl's son Hamilton, and then flew to Pueblo to refuel and then to Santa Ana for the final leg of that.

But I can't give you any guidance on the Legs 3, 5 and 6, what they were for or what the purpose was.

Q Is it possible this might have been the instance

that Karl had arranged to fly Senator Hart from New York to Washington?

A It may have been. To me it seems like there was, this is my speculation, and I seem to recall some kind of conversation, although it's kind of away in the back of my subconscious, but it's something that Gary Hart had to be in New York for some reason, which would have made sense, because the plane leaves Tetterboro with Stuart and maybe somebody else. They go pick up Gary, bring him back to New York. He gives a speech or does whatever he does. Then he's the only person on Line No. 6 who goes back to D.C. He's dropped off and then the plane comes back in and picks us up.

Q At this point that's your best inference?

A That's correct.

Q You don't have an actual recollection of that?

A No, I do not.

Q Now, am I right, you said you remember a time that Stuart Karl told you that Hart had returned to Washington. Are you saying you're not sure if this is the instance or not?

A That's correct. I'm not. I can't specifically remember if this is it or not.

Q Can you tell me what business the company or Mr. Karl had in Pueblo, Colorado?

A That was a refueling stop.

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Q Like Salina?

A Like Salina, Kansas. That's correct, yeah. We apparently with a fully loaded plane from Youngstown to Orange County, we must not have been able to make it non-stop and so Pueblo is where we stopped. I do remember that as being a stopping point. I'm sorry. A refueling point.

Q I see.

Thank you. Let's go on to the next one.

Let me ask you one more question about this one.

If you turn to the third page you'll see something which reads at the top "Charter Quote Sheet" which appears to be an additional form that Martin Aviation filled out.

A Okay.

Q What I'm curious about is when it describes "Type of Catering Required" down at the bottom, it seems to say "... and from DCA to YNG, Youngtown, to SNA, have beer and champagne on board always."

Can you explain that?

A Stuart Karl was, drank Corona beer and Dom Perignon champagne, and there was no telling which of the two he would want at any given moment in time. But there was always, to the best of my knowledge, two bottles of Dom Perignon and two six-packs of iced Corona on board any time

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he was on the plane. So that was what that was referring to I'm certain.

Q So that you think is to Karl's personal taste and not the indication or not of any particular person being a passenger?

A No. I'm certain that's his, was his taste.

Q Why don't we go on to the next one?

MR. BERNSTEIN: This one that we've just been discussing is Exhibit No. 8.

(The document referred to was marked FEC Exhibit No. 8 for identification.)

BY MR. BERNSTEIN:

Q Flight Lot No. 10236, Mr. Hunt, which I just handed you, indicates on the log at least it was authorized by Doug Rosen.

A Yes. I find that is highly unusual and do not know how Doug Rosen would have had the authority to authorize a charter from the company.

Q It's news to you, then.

A I never heard that before.

Q Do you have any opinion on how it arose?

A No. I can't even unfortunately speculate and I think it was a helicopter, actually, because I think they've got the pilot in command -- First of all, there's only one

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pilot in command and we always flew planes that required two pilots and you see no SIC.

So I suspect this was probably a helicopter.

I think Doug was the guy, it's not Doug Rosen but Doug Daigle was the pilot's name. But I don't see anywhere in here where it says helicopter.

Q Would you refer that, too, from the hourly charge?

A From the hourly charge and also from where it went. We rarely ever took a jet from Santa Ana to Santa Monica, for us it just didn't make sense.

Q The only other information is provided on the invoice so if you will look on the invoice, the second page, under "Comments" it states: "Authorized by Doug Rosen, SMO Santa Monice" with an "e". And then it says "Photo flight".

Do you know what that means?

A No, I don't.

Q Why don't you go on to the next one?

A Okay. And this "Tyler Mount", I'm not certain who Tyler Mount is.

Q Do you think that's the mame of a person?

A This may have been a photo flight because maybe a Tyler Mount is so me form of a camera.

MS. JACOBY: Photo camera.

THE WITNESS: Yes.

MR. BERNSTEIN: Thank you.

An education to all of us.

That's Exhibit No. 9.

(The document referred to was marked FEC Exhibit No. 9 for identification.)

BY MR. BERNSTEIN:

Q Flight Lot No. 10483 is a flight in June of 1986, apparently from Tetterboro to Washington and returning.

A Um-hm.

Q And the notes, both in the lower right-hand corner of the first page and as "Comments" on the Invoice page reads: "Meeting with Senator Gary Hart."

A Correct.

Q Do you know what this trip was about?

A No, I do not, but I do remember being in New York once when Stuart mentioned that he was going to Washington, D.C., for a day, and I suspect strongly that this is that particular flight, although I do not recall what the conversation was about or what his plans were with Senator Hart.

Q Can I ask you in the instance you said you recalled of Stuart Karl wanting to fly Senator Hart from New York to Washington, in that instance the plane would have been empty coming back; is that right?

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A That's correct.

Q So this couldn't, if the indication is correct there was a passenger on each of these legs, this could not have been that?

A No. I'm fairly confident it's Stuart Karl going round trip from Tetterboro to D.C.

Q Do I gather that the note about the meeting with Senator Hart is as much information as you can remember from it?

A Yes.

Q I'd like to ask, to the extent that you have a recollection of it, did it seem to you that this period of time, which now I guess is June 1986, that Stuart Karl was occupied a lot of the time with campaign-related activities?

A Now, that you mention it, actually from the period of March through probably June or July, it seemed like he was inundated with campaign activities.

Q Of 1986?

A Of 1986. And my memory had it a little bit later in the year. Now, reflecting back on that, it really did begin in the whole kind of latter February, March, April, May, June, even July time frame. That's when a lot of activity was going on.

I do remember it being a very intensive period of time that Stuart was actively involved, tough to get a-

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hold of because he was doing stuff with Hart, very tough to pin down.

Q Did you have discussions about that with other executives or employees?

A I had discussions with Stuart himself. Stuart brought Court Shannon and I into his office and had mentioned that we'd probably be working two days every other week on Gary Hart related activities until such time as Gary got the nomination, at which time he would then begin working about two days a week and there would be a lot of trips to Denver meeting with the Hart people in Denver and then a lot of trips to Washington, D.C.

And I remember him saying, "You guys are really going to have to make sure you've got everything buttoned up so you can manage the company," because he really felt that Gary Hart was going to elected and after the election and his subsequent, I guess, appointment as ambassador to the U.K. or wherever he was going, Court and I then would run the company and take care of his financial interest.

Q Did he relate his understanding that if Gary Hart were elected he would be appointed an ambassador?

A Yes. He did not say he would be appointed ambassador. What he said was that he would be appointed some, there would be some appointment for him that would be a full-time appointment and the he hoped it would be something like

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being ambassador to some country. And I remember him always saying how much, sometimes in jest and sometimes seriously, saying how much he would enjoy being ambassador to some place like France or Great Britain or Germany. But he definitely referred to being ambassador more frequently than maybe, I don't know, head of custodial services or any other appointments that are made. I'm not really certain what they are.

Q Did you assume that he was being serious about this?

A Absolutely. Yes. There was no question in my mind that he was being serious. There was no doubt in my mind that he had heard that from someone else because Stuart was not the type of person just to fabricate that kind of information.

Q Did he give you any idea where he had got the idea from?

A No, he did not say "This person told me," but there was always the understanding that if it wasn't Gary Hart himself, it was somebody very close to Gary Hart.

Stuart Karl is not a philanthropic person by nature, although he did a lot of stuff for employees. If you talked to employees he would say, "Yes, he was a very generous man." He was always generous as long as you were producing something for him. He was not the type to be philanthropic and just give money to Gary Hart because he

believed in what Gary Hart was projecting or what Gary Hart represented. So I'm certain there was some, that there was some, that there was a lot of validity to the fact that something had been promised him in return, in addition to Stuart telling me that there had.

Q You don't remember any names being mentioned?

A No.

Q Doug Rosen's name, for instance?

A No. No, I don't. Sorry.

MR. BERNSTEIN: This one was FEC Exhibit No. 10.

(The document referred to was marked FEC Exhibit No. 10 for identification.)

BY MR. BERNSTEIN:

Q And next if Flight Log 09987. The flight is in July of 1986.

A I remember Stuart Karl's family going to some place in New England, and I don't know where ACK is.

Q ACK, I believe, stands for Nantucket.

A That's it. That's where they vacationed.

And then -- What is UNY to SNA?

Q I believe VNY stands for Van Nuys, Mr. Hunt.

A Oh. VNY.

Unfortunately I cannot recall why this trip would have ended in Denver. The fact of the matter is if this

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came from Martin Aviation the plane had to go from Denver back somewhere else, but unfortunately it doesn't say so here. Because the Denver to Van Nuys is scratched.

Q You don't have a memory of what the travel to Denver was for?

A Would have represented, no.

Q Let's go to the next one.

MR. BERNSTEIN: This then that we just discussed is Exhibit No. 11.

(The document referred to was marked FEC Exhibit No. 11 for identification.)

BY MR. BERNSTEIN:

Q I have now handed you Exhibit No. 12, Flight Log No. 09820.

(The document referred to was marked FEC Exhibit No. 12 for identification.)

BY MR. BERNSTEIN:

Q Travel again in July, July 11 and 12, 1986, to Denver and return, with passenger indicated Mr. George Karl.

Do you know why Mr. George Karl went to Denver, Mr. Hunt?

A No, I do not. Under normal circumstances I

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would have said I suspect it was probably Stuart operating under George's name, but Bob Garcia, who is the pilot in command, was not a pilot of a Lear 35 and Stuart would not have flown in a plane that wasn't a Lear Valiant, I don't think. So it's possible that this is George.

Oh, I'm sorry. It says Lear 35-A on here.

But I don't remember Bob Garcia being a Lear 35 pilot.

Anyway, I can't answer anything about this.

Q Okay.

This is now Exhibit 13, Mr. Hunt, Flight Log No. 10008.

A Right.

(The document referred to was marked FEC Exhibit No. 13 for identification.)

BY MR. BERNSTEIN:

Q And the flight July 21 to 26 of 1986?

A Yes.

Q To a variety of places.

A Right. This was one of those trips that I had, sometimes when I took a trip which because of my time schedule wouldn't allow commercial jets to go, I had to go to so many different locations.

This was a trip, and I don't remember who was

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on that but it must have been in support of some major theatrical release that we had going on at that moment in time.

Q My question is whether, to the best of your recollection, this trip would have been campaign-related in any way?

A I can assure you it was not campaign-related in any way.

Q Okay. Thank you.

I will now hand you what will be Exhibit No. 14, Flight Log 10011, which is a flightin late July 1986.

(The document referred to was marked FEC Exhibit No. 14 for identification.)

BY MR. BERNSTEIN:

Q The passengers on at least some of the legs seem Jeff Jenest, Court Shannon,Tom Haymen, and then later Stuart Karl and family.

Can you look at this quickly, Mr. Hunt, and recollect whether --

A No. Unfortunately --

Q Not at all?

A No, I can't tell you whether it was campaign-related or not, unfortunately. Sorry.

Q Thank you.

I am now handing you Exhibit No. 15, Flight

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Log 3382 and this is a flight on October 8 through 10th, 1986.

A Okay.

(The document referred to was marked FEC Exhibit No. 15 for identification.)

BY MR. BERNSTEIN:

Q And this flight went to a variety of places, including Washington, and returned.

A No. I can't answer -- I'm not certain what this is, what this flight represents.

Q Do I assume from your answer, Mr. Hunt, that you were not on the flight?

A To the best of my knowledge I don't recall being on this flight. It went from Santa Ana, MSP is --

Q Minneapolis, St. Paul.

A -- Mineapolis, St. Paul, to Omaha?

Q Yes.

A Omaha to Washington, D.C.; D.C. to Salina, Salina, LAX. I do not recall being on this flight and I think I would have.

Q So you don't know anything about this flight?

A (Pause) This flight (pause) I think this flight is the flight with Jane Fonda and Ron Bonham. It was Karl-Lorimar business, because I remember being in Minnea-

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polis and I remember meeting them in Minneapolis. I left and came home and I remember they went on to Omaha and Washington, D.C.

Q Do you know why they went to Washington?

A Yes. There was a personal appearance by Jane at one of our major customers in Washington, D.C.

Q Who was the major customer in Washington?

A I couldn't tell you now. It was probably Schwartz Bros., but I most certainly, something in my files, there definitely would be something that would refer to this trip, or something in the files of Nick Norton, because this was a major, this would have been a major public relations event with Jane.

Q The reason I ask is because I understood you to say that there was not any Karl-Lorimar business in Washington, as much as you can remember.

A Oh, I'm sorry. Maybe I should have rephrased that. There would have been nothing where Stuart Karl would have gone to Washington, D.C., for. We had customers in Washington, D.C., and we had large customers, but Stuart did not go to customers and contact them on a regular basis. There would have been reason for me or maybe one of my region managers to go to Washington,D.C., but nothing of any business consequence that Stuart would have gone there for.

Q I see. Thank you.

We're getting there.

I am now handing you Exhibit, what will be Exhibit No. 16, Flight Log 3723, travel on November 21st to 22d, 1986, from Santa Ana to Washington and then back via apparently two stops, the acronyms for which I don't recognize.

A DEN is Denver. And DEV, I don't know what -- Oh, I'm sorry. Look down here. Santa Ana to Washington.

(The document referred to was marked FEC Exhibit No. 16 for identification.)

BY MR. BERNSTEIN:

Q Mr. Hunt, my understanding is that the itinerary is probably what is completed in advance of the trip and then the actual touchdowns are indicated below.

A Well, it is possible that they would be going to Denver but that there is some small airport right outside of Denver and that's where they chose to land. But, you're right, until we knew what FNL was . . .

I'm not familiar with this trip at all.

Q It seems to indicate that one passenger traveled to Washington and then three additional people went on to FNL, whatever that is. Again, this is November of 1986.

A No. Sorry. Can't help you.

Q Can I ask you one more question about it?

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A Sure.

Q The pilot in charge does not seem to be Amsden Wayt.

A Gary O'Dell, though, is second in command.

I'm not certain, Kevin Wyatt, I don't recall flying with him.

Q The passenger actually listed on the first page is Mike Severy.

A Well, Mike Severy could have been a passenger.

Where does it say that?

Right here?

(Pause) Maybe Severy went, Severy may have gone with Stuart -- I'm just not really certain. This could have been maybe a trip that Stuart gave Mike or Mike had to take. I just can't really tell.

Q That's fine, Mr. Hunt.

I realize this took place some time ago and we want only to get your best recollection.

This next one is FEC Exhibit No. 17. It is Flight Log No. 3717, travel on the 24th and 25th of November to Denver on to Tetterboro on to Chicago and then ultimately back.

(The document referred to was marked FEC Exhibit No. 17 for identification.)

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A I can't recall being on that or what it was for.

Q What business did Karl-Lorimar have in Chicago?

A Our second largest customer was in Chicago, Sound Video, and at that time, which is now Baker & Taylor, but as I mentioned, it was highly unusual for Stuart Karl to go see a customer without me or Rob Bonham accompanying him.

Q Can I ask you, in the notes there it indicates that three six packs of Corona should be on the plane. Can we infer from that that Stuart Karl would have been on this flight?

A You can, although it became customary towards the end that on any flight there was always a couple of six-packs of Corona with the thought that Stuart may show up and that they wanted it on there.

Q Thank you, Mr. Hunt.

I am now handing you Exhibit No. 18 and this again is a flight to Washington apparently from Tetterboro and returning and my understanding is that the information ordinarily filled out about the legs, is not completed in the instances where Martin Aviation brokered the flight through some other --

A That's correct.

//

2 3 0 4 3 3 2 8 4

(The document referred to was marked FEC Exhibit No. 18 for identification.)

BY MR. BERNSTEIN:

Q Are you acquainted with the name Mr. Emerson, Mr. Hunt?

A No, I'm not.

Q Do you see that that neme is indicated as a passenger?

A Yes, I do. I do not recall that person being affiliated with Karl-Lorimar.

Q Well, knowing from this information that apparently only one person was transported to Washington from Tetterboro and dropped off there, do I gather you don't have a specific recollection, you don't have an opinion of what this was about?

A No, I don't.

Q Exhibit No. 19 is Flight Log 2826, travel on the 5th of December, indicating in the upper portion it was authorized by Gary Hunt --

A Okay.

Q -- and curiously enough the invoice indicates it was authorized by Gary Hart. Can we assume that that's a miss-type, it's an errato?

A I hope. Yes, I'm certain that that's just a

9 3 0 4 3 5 3 2 8 5

mistake.

(The document referred to was marked FEC Exhibit No. 19 for identification.)

BY MR. BERNSTEIN:

Q Assuming it's a mistake, do you have a recollection, was this a business flight?

A Yes, it was. Santa Ana to SanJose and then back to Santa Ana.

Is that SJC?

Q Yes, I believe so.

A Unfortunately at this moment in time I cannot recall exactly what this was about, but I do remember being on a trip with -- Oh, I know what it's about.

We landed in San Jose and we drove to the city where Sunset Magazine is located which starts with an M.

Q Menlo Park?

A Menlo Park. We met with the Sunset Magazine people about doing a possibility that Sunset Magazine, that's a big magazine in the Western thirteen states, doing a video on Sunset Magazine, so this was definitely Karl-Lorimar business.

Q Thank you, Mr. Hunt.

Exhibit No. 20, Mr. Hunt, is Flight Log No.3979

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which is travel on the 10th, 11th and 12th of December. Two passengers is all that is indicated and the flight was to a variety of places, including Nashville, Tennessee, and Pittsburgh.

(The document referred to was marked FEC Exhibit No. 20 for identification.)

A Pittsburgh, Chicago.

The two passengers were Rob Bonham and myself.

Q Was this a business trip, Mr. Hunt?

A Yes, it was.

Q Thank you.

Exhibit No. 21 is Flight Log No. 2127, Mr. Hunt, which is travel in very early 1987.

A I have Flight No. 09399.

Q Okay. I'm sorry, Mr. Hunt.

You left Karl-Lorimar March 10 of '87?

A '87.

Q I see.

(Asides)

This is Exhibit No. 21, Flight Log No. 2127, and as I was describing earlier, it's travel on the 9th and 10th of January.

(The document referred to was marked FEC Exhibit No. 21 for identification.)

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BY MR. BERNSTEIN:

Q The question I want to ask about this is that on the passenger line it seems to indicate Mr. and Mrs. Stuart Karl plus and it looks as if it is Gary Hart or perhaps Gary Hunt plus guest were the latter two entries crossed off and filled in after that Dean Bender.

A Yes. Let's see. This was, the date was, is this 12/23?

Q No. I believe it's January 9th and 10th.

A Okay.

Q In 1987.

A January 9th and 10th.

I believe it was scheduled on the earlier day but travel took place later.

Santa Ana, Las Vegas and back would have been one of two things, but they both would have been company-related and I think that this was actually the time that my wife came along but that -- this is '87. No. This would have been for a convention. Dean Bender would have been there on company business. So it was a company function.

Q Thank you.

Exhibit No. 22, Flight Log 1556, and the itinerary seems to indicate Denver originally as destination. Passengers Stuart Karl and Steve Rivers, plus one DEN, presumably to Denver, although the actual destination seems

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Salt Lake City, Tetterboro, and then returning.

(The document referred to was marked FEC Exhibit No. 22 for identification.)

BY MR.BERNSTEIN:

Q Do you know what this flight was about?

A No, I'm sorry, I can't recall that.

Q Exhibit No. 23, Flight Log No. 2155, travel February 11th and 12th, 1987.

(The document referred to was marked FEC Exhibit No. 23 for identification.)

A This would have been the Toy Fair the following year, Toy Fair in 1987.

Q Is that the right time of year?

A Right time of year. I would have been picked up from my standard vacation in Salt Lake and --

Q You go to Salt Lake every year?

A I go to Snowbird.

Q Thank you.

A I never get to stay the full time.

Q Exhibit No. 24, Mr. Hunt, is a flight, travel on February 18, 1987, to Denver and return and the passengers indicate that they are Stuart Karl, Doug Rosen and Gino Thinasquieu, is my best guess.

6 3 5 3 0 2 8 9

A That is the correct pronunciation.

(The document referred to was marked FEC Exhibit No. 24 for identification.)

A I am not certain what the purpose of this was, although I doubt that it was Karl-Lorimar business.

Q Do you know who Mr. Thinasquieu is?

A No, other than I know, have heard the name on a number of occasions. I don't know who he is.

Q So you can't add to the fact that is indicated here that Doug Rosen was on the flight and flew to Denver?

A No, I can only speculate they would have been there doing something related to the campaign but I can't say that for a fact.

Q Thank you.

The next and last invoice, Mr. Hunt, Exhibit No. 25, is travel on the 24th of February, again to Denver and return, with the passengers indicated as Karl plus, then it has a name that looks to be Tom Epstein, which is crossed off, plus Griff Ames.

(The document referred to was marked FEC Exhibit No. 25 for identification.)

A I do not know why they would have been going to

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Denver and I'm not certain of the purpose.

Q Well, thank you, Mr. Hunt.

Off the record for a moment.

(Recess.)

MR. BERNSTEIN: Back on the record again.

In the interim Mr. Hunt has reviewed the Flight Logs and Invoices an Mr. Hunt, we are now looking again at Exhibit No. 23, and that's Flight Log 2155 and I wonder if you can relate to us the added insight you had when looking at the invoice again and thinking about what it involved?

THE WITNESS: To the best of my recollection this is the flight where Doug Rosen returned home from Tetterboro, New Jersey, to Orange County, with Stuart Karl, Court Shannon and myself and this is the flight that I had earlier referred to the conversation that Stuart Karl and Doug Rosen had relative to Gary Hart paying back, or the campaign paying back monies from the '84 Convention and also Doug Rosen saying that he didn't want to talk about it, didn't want to know about what seemed to be campaign contributions from Karl-Lorimar employees.

BY MR. BERNSTEIN:

Q Your recollection then is that the conversation you overheard was on the flight that is recorded in this Flight Log?

A That's correct. And actually, to the best of

my recollection, it's the actual segment, Leg No.3, which would have been from Tetterboro, New Jersey, to Salina, Kansas, where we refueled. I then remember most of the passengers sleeping from Salina, Kansas, to Orange County.

Q Do the times that are on that jibe with your recollection?

A Yes, they do.

Q They seem to reflect --

A An evening flight.

Q It seems to reflect that there was an overnight stay in Tetterboro; is that right?

A There would have been an overnight stay in Tetterboro, yes. We went to New York for a day, had a meeting in New York and then we flew up the next afternoon.

Q Okay. Thank you, Mr. Hunt.

Mr. Hunt, what I'd like to show you now is copy of, and this will be Exhibit No. 26, copy of an Orange County Register article dated 29 January 1988.

(The document referred to was marked FEC Exhibit No. 26 for identification.)

Q It's a long article but I would direct you to the last page of the article, Mr. Hunt, and you'll notice that on the exhibits that have been handed to you there are portions that are highlighted in yellow.

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And I'd like to read, Mr. Hunt, the portions that are highlighted, starting about midway down the page, the sentence that begins: A former Karl-Lorimar executive said Rosen and Karl again discussed disguised Hart Campaign money in the fall of 1986.

It says: That conversation between Rosen and Karl was during a learjet flight from Tetterboro, New Jersey, to John Wayne Airport, according to the executive, who was on the airplane and overhear the discussion.

"Rosen and Stuart were discussing the 1984 campaign debt on the way back to the coast," said the executive, who asked not to be named. "Stuart said to Rosen, 'Listen, I've hidden the campaign '84 contributions. Am I going to get my money back?'"

The executive said Rosen assured Karl that he would be repaid and said, quote: "You've done a great job in fund raising. We look for more (financial) support from you." Unquote.

The executive said Karl was concerned with his "sizable investment" quote/unquote, in the Hart campaign.

A Um-hm.

Q Then in the following column there is another paragraph which reads:

However, an executive who was on the majority of flights was told by Karl that Rosen was making the trips as, quote, "Gary Hart's public-relations man." Unquote.

Mr. Hunt, are you the executive who is quoted in this story?

A I may be the executive quoted in the story, but I did not make those comments.

Q Which comments?

You mean any of these comments?

A No, I did not make any of those comments.

Q Can you tell us, Mr. Hunt, who else would have been in a position to make these comments?

A Well, I'm not so certain that these comments may not be related to a discussion I had with the individual that I had mentioned that I spoke with from the Orange County Register earlier today. I'm not so certain, though, that he may not have taken some literary license on some of the things that I said and made them seem kind of more appropriate for what he was trying to display to the public.

But I can assure you that if this is a result of the conversation I had with him, and it certainly looks like it was. Frankly when I read this I thought that it was. I did not make these particular comments.

If I had spoken with him on the subject, on this particular subject, it would have been exactly what I mentioned to you, and that is that the conversation was one of nothing of any real specificity as much as, you know, Rosen trying to act like it was something that he didn't

really want to know about.

Doug Rosen certainly, in my presence, did not say: "You've done a great job of fund-raising. We look for more financial support from you." And I never even got the indication that Stuart Karl reported to Doug Rosen in all of the meetings that I had with those two guys.

Q Well, actually I thought earlier you had related something to the effect that they were looking forward to more such things from Mr. Karl. I thought that you related something like that.

The substance of this you might very well have related to the Reporter?

A That's correct.

Q You are relatively certain that the quotes that are attributed to you were not your exact words?

A I can assure you those were not my exact words. Unless this came from some other executive.

Q Leaving that side for the moment, maybe you can, looking at that, tell me, other than what you've just said, other than the indication you've just given, are there any other ways in which, you know, apart from maybe mis-attribution of the quotations, that substantively the statements are inaccurate?

A Let me make certain that I understand your question exactly.

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Are you saying is it possible that Stewart said to Rosen something to the effect that, you know: "I've hidden the '84 contributions. Am I ever going to get my money back?"

Earlier in the conversation, as I remember the conversation that i recall from that particular jet trip, it was something to the effect of: "Am I going to get repaid any of the monies that we put in, especially monies that we put in right before the tail end of the campaign?"

And as far as Stuart saying, "We've hidden the monies," I don't recall those exact words, although certainly I think that's probably what Stuart Karl had done. That's not something that I heard and as a result I think that's a key word. I would not have used that unless I remembered it to be, you know, that specific.

Side 6

Another thing which I think is also as critical if not more, is that I never heard Doug Rosen say to Stuart Karl that he would be repaid by anyone. Based on my recollection of what I have said earlier, Doug Rosen said something to the effect of, "It's just an investment in the future," and that's when Stuart talking about being ambassador and all that kind of stuff.

Q I find that version more plausible.

Going on to the next question: If some of these quotations were from a source other than yourself,

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can you give any indication of who else could have been in a position to relate this?

A There were only a handful of people who were on any of the flights and that would have been Court Shannon, Jeff Jenest, Mark Lambert. That would have been just about it, and myself. We were really the only other ones that worked with Stuart and flew with Stuart on a regular basis.

Q Can I try to pursue for a moment the knowledge that you acquired of apparent funds to the tune of twenty-seven to thirty thousand dollars that Karl had advanced around the time of the Democratic National Convention?

A Um-hm.

Q Had you hear anything about that prior to overhearing that conversation?

A I can't remember if Stuart mentioned that in a car. He definitely mentioned to me again, and it was either in, it was in his automobile and we were traveling to Los Angeles. It was to attend a meeting at the parent corporation. And I can't remember if that conversation happened prior to hearing it on the jet or if it happened after. But I definitely remember that it happened twice. And I definitely remember two separate occasions him mentioning numbers twenty-seven thousand to thirty and ninety thousand dollars. Those were the two figures that I do recall.

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I do also remember that it was in the automobile that he referred to the fact that he had, that was the first time that I had heard, that he said that he had gotten an attorney to look into the matter. And if I remember correctly, it was in his office with Doug Rosen that I first knew, that he first mentioned the attorney's name although I don't recall who that was.

Q And your understanding was that the twenty-seven to thirty thousand were amounts representing outlays for campaign materials in connection with the Convention?

A Yes. Specifically he mentioned balloons and some type of construction material for signs and that type of thing.

I can remember vividly because I can recall thinking how many baloons you could buy for thirty thousand dollars.

But I do remember him saying that it was a very last minute kind of an urgent request from the Hart campaign to come up with the funds.

Q He didn't give you an idea of other materials that might have been involved?

A No. He said just balloons and construction material, excuse me, for signs and things like that. That's all he mentioned.

Q Beyond that, did you have any other indication

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of campaign expenses being paid by Stuart Karl?

A No. Other than the fact that Rama told me that there was a moment in time that the Hart, and this was towards the tail end of '84, I'm not certain you've taken her deposition, too, so she'll mention this, but that she had told me that there was a moment in time when the Hart people basically, they'd just call up on the phone and Stuart said, "Write them a check for whatever it is that they need."

Q That was related to you by Rama Middel after you came to work there?

A That's correct. Yes.

Q By Rama.

Do you know who a Mrs. Shirley Rosen is, Mr. Hunt?

A No, I do not. I suspect it's Doug's mother. He's not married.

Q Going back to the contributions to the Carter Committee and to the Townsend Committee that you related, Mr. Hunt, am I correct that you went to a fund-raiser in connection with the Townsend contribution?

A That's correct.

Q And who representing the Committee and/or the candidate attended the fund-raiser?

A Kathleen Kennedy Townsend herself attended.

Q And other officials of her committee?

A I was not introduced to any. I couldn't tell you if there was or not.

Q Let me just ask you the general question, Mr. Hunt, and that is: Either from that fund-raiser or from other communications you might have had, did you have any reason to think that individuals or the candidates from the Carter Committee or the Townsend Committee were aware that Stuart Karl intended to and did reimburse contributions?

A No, I do not. I think that it was a unilateral action on his part to look good in the eyes of people that he felt could do him some good at some time in the future. And I had no indication whatsoever that those people had any idea that that was taking place.

Q Do you know where he got the idea from?

A No, I do not.

Q A last question about the contributions, Mr. Hunt: I asked you if at any point you had discussed legality of the practice of reimbursement with anyone, and you said no.

A Right. That's correct.

Q In your own mind did you have, what assumption, if anything, did you have about whether such a practice was legal or not?

A I thought it was only illegal if you wrote

it off on your income tax. I did not think, frankly did not think about that part of it being illegal. Certainly did not think of it being, of having any real serious legal consequences. And when Stuart mentioned to me that he assued me that a number of different candidates did it and that's how most funds were generated, I thought to myself, you know, he's probably correct, that that's probably how it does work. People go and say if you do this, I'll reimburse it and certainly looking back on hindsight, I wish I had had the opportunity of just saying, "No, I'm sorry, I'm not going to participate in that at all."

But really, at the time, I never really viewed it as a serious breach. And actually up until that moment in time, didn't really understand whether it was a Federal law or State law what could be or couldn't be, or whether it was just somebody running for President, you know, I wasn't really specifically schooled in that part of the, of how that law read.

Q Did Stuart Karl mention any particular candidates to whom this was an ordinary practice?

A No, he did not, although it was clearly the indication that he had heard this from some of the Hart people, from my perspective, because when he said, you know, "I assume you that this happens in all the major, with all major candidates and all the campaigns," then my under-

standing is, you know, you learn that through osmosis, just being involved with people and absorbing their knowledge, hearing one guy say, "Well, yeah, we do this, we do that." And my understanding was that Stuart picked that up through someone else. The only campaign that he had ever worked on was the Hart campaign.

But I do not know specifically if that's where he got it or not. I just have a hard time believing that Stuart Karl was the only person -- I'm sorry. I have a hard time believe that Stuart Karl thought this up himself being that that was the only campaign that he was involved in.

Q I think you earlier said that you weren't aware of exactly who from the Hart campaign Stuart Karl interacted with on a regular basis?

A Other than Doug Rosen and David Stein and Bernie Snyder, I do not know who Stuart worked with on a regular basis.

Q Can I ask you, also, at any time either previously or subsequently, had you been reimbursed in cash by Rama White for any reason?

A You mean for office --

Q Other than for the Carter contribution and the Townsend contribution.

A No, I can't recall ever being reimbursed from her for anything.

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Q Did that cause questions in your mind whether this was a proper activity? It was a bit unusual?

A Oh, yes, absolutely. Absolutely. It was unusual. But it was not unusual for Stuart Karl to have a lot of cash on hand, including a safe in his office and so I would not have thought anything of being reimbursed in cash versus a check from him.

The cash in and of itself didn't mean anything to me because the man always had six or eight hundred dollars cash in his pocket and always had, you know, a ready supply of cash around.

So the cash in and of itself did not flag anything to me unusual from Stuart. You have to remember the way the man lived. You know, when he went at for lunch and he wanted champagne, he would order a hundred dollar bottle of champagne for lunch. And so that part in and of itself didn't cause me any great concern.

Q When, it was Rama White who handed you the cash in an envelope?

A Um-hm.

Q Did the envelope say on it "Reimbursement for Campaign Contribution"?

A No. No. It was just a white Karl-Lorimar envelope and she said, "Here it is. This is for your donation."

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And I said, "Okay. Thanks."

And there was nothing on it or anything like that.

MR. BERNSTEIN: Off the record for a minute.

(Discussion off the record.)

MR. BERNSTEIN: On the record.

BY MR. BERNSTEIN:

Q Mr. Hunt, you testified at great length and quite openly about your best recollections of these activities and I'd like to ask you the general question of whether there are any other communications or contacts that you recall relating to Stuart Karl's campaign activities.

A Not at this time, no.

Q At this point I would ask that indeed you, you know, find and compile into a form that you can give us your calendar or diary that covers the period in question.

A Okay.

Q I think that we would find that helpful.

You will have the opportunity to review the text of this deposition and to sign it before a Notary Public attesting that is a true attestation of your statements today.

And I would remind you again that under the Federal Election Campaign Act, the civil investigations conducted by the Commissioner are confidential and I would ask

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that you please keep that in mind and we appreciate your cooperation and lastly I should point out that this deposition is a continuing one, such that we may have further questions as the investigation progresses and may ask that you speak with us again. And we will certainly let you know and try to give you sufficient notice if that's the case.

Is there any statement that you would like to make, Mr. Hunt, or counsel?

THE WITNESS: Not at this time.

MR. BERNSTEIN: Okay. Off the record.

(Whereupon, at 2:54 p.m. the deposition was concluded.)

Gary Douglas Hunt

GARY DOUGLAS HUNT

Subscribed and sworn to before me this ____ day of _____, 19____.

_____
Notary Public

My Commission Expires _____

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STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I, Harry Attmore, a Notary Public for the State of California, certify:

At the time and place therein set forth in the foregoing transcript, the witness, Gary Douglas Hunt was put on oath by me.

IN WITNESS WHEREOF, I have subscribed my name and affixed my seal this 12th day of April, 1988.

Harry Attmore

NOTARY PUBLIC IN AND FOR THE STATE OF CALIFORNIA

OFFICIAL SEAL
HARRY ATTMORE
NOTARY PUBLIC - CALIFORNIA
LOS ANGELES COUNTY
My Comm. Expires Nov. 6, 1989

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To The Witness

This proceeding is known as a deposition. The person transcribing the proceeding is a Certified Shorthand Reporter, who is also a Notary Public and has placed you under oath. During the course of this proceeding I, and perhaps other of the counsel present here today, will be asking you questions pertaining to this matter.

Although this proceeding is being held in an informal atmosphere, since you have been placed under oath, your testimony here today has the same force and effect and is subject to the same penalties as if you were testifying in a courtroom before a judge. Specifically, you are subject to the penalty of perjury. Perjury is defined as "willfully, and contrary to an oath administered, stating as true any material fact which one knows to be false." You are advised that an unqualified statement of that which you do not know to be true is equivalent to a statement of that which you know to be false.

If, at any time during the deposition, you feel that a question is ambiguous, that you are unable to understand a question, or you fail to hear the question for any reason whatsoever, please tell the person asking you the question. If you do not so indicate, it will be presumed that you have heard and have understood each question and that your answer to each question is based upon your complete and full understanding thereof. If, after a question has been posed to you, you have any question yourself relating to what has been inquired about,

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FEC Ex. #1
witness: HUNT
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Los Angeles
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please tell the person who posed the question before you answer the question.

The reporter is only able to transcribe audible responses, so please do not nod your head, shake your head, or say "ahha, haah." Further, the reporter can usually record the words of only one person speaking at a time, so plese allow time for the questions to be completed before you respond. You will normally be allowed to finish each and every answer before a new question is posed.

At the conclusion of this deposition, the reporter will transcribe these proceedings into a booklet form, and you will have an opportunity to read that booklet and make any changes in your testimony that you feel are necessary. However, if you do make changes in your testimony, as it is given here today, I will be entitled to ask you why you made such changes. Because of that fact, it is important that all of your answers be full, complete and correct.

If I ask you about any conversations you have had in the past and you are unable to recall the exact words used in the conversation, you may state that you are unable to recall those exact words and then you may give me the gist or substance of any such conversation, to the best of your recollection. If you recall only part of a conversation or only part of an event, you are requested to give me your best recollection of those events or parts of conversation that you recall. If I ask you whether you have any information upon a particular subject, and you have

9304353308

overheard other persons conversing with each other regarding it or have seen correspondence or documentation regarding it, please tell me that you have such information and indicate the source, either a conversation or documentation or otherwise, from which you derived such knowledge. In answering, please do not be concerned with whether or not your answer is hearsay or concern yourself with any technical rules of evidence you think may preclude answering.

Our purpose here today is not to trap you or to trick you in any manner, but simply to ascertain and discover that information about the facts concerning this investigation that you have within your knowledge.

At the conclusion of this deposition, the attorneys present may, by agreement, stipulate that you sign the booklet containing your testimony in the presence of any notary public, rather than the reporter who is here today, taking and transcribing this deposition. If we do so agree, it will be upon the expressed understanding, and your promise, that you will, upon receipt of this deposition, promptly and as expeditiously as possible, read it, correct it if you feel necessary, and sign it in the presence of a notary public and return it to the office from which it was sent to you.

Do you understand everything that you have just read?

Yes ✓ No _____

9304353309

Do you have any questions pertaining to either the procedure or what is about to transpire, insofar as this deposition is concerned? If so, please ask them now of me.

Please indicate that you have read and understand all of the foregoing, by signing this document where indicated below.

Gary Hunt
Signature of Deponent

Exhibit one to the deposition of GARY Hunt,
taken on April 12, 1988.

9304353310

Exhibit TWO

80

FLIGHT LOG

MA № 7793

Mammoth Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 852-8300

03

Date: 2-6-86 ACFT: 2-7 044CB 5 3 3

PIC: SIC:

Sched. By: MIKE SEVERY Date: 2-6-86

AUTHORIZED BY: RAMA CUSTOMER: STUART KARL

ADDRESS: ON-FILE

QUOTE: PHONE: (W) 714-474-0355

AE BA MC CASH CHECK CREDIT PAID (H)

ITINERARY: SNA TO SMD (2) 1700 SMD TO SNA (2) 1745 TO

TO TO TO

PAX: MR DOUG ROSEN + MR STEVE RIVERS

LEG NO.	1	2	3	4	5	6
TOW						
MGTOW						
C.G. LOCATION						
C.G. LIMITS						

1.0	FLT. HOURS @ 595.00	= 595.00
	WAIT HOURS @	=
	MAX. WAITS @	=
	RON'S @	=
	MISC @	=
	SUBTOTAL	= 595.00
	FED. TAX 5% 8%	=
	FLIGHT TOTAL	= 595.00

FUEL 53.72

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
1	2	2/6	SNA	18243	18253	—	—	1.0	+					
2									+					
3									+					
4									+					
5									+					
6									+					
					TRIP TOTALS			1.0	+					

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.	18283					
TRIP TIME	1.0					
TOTAL TIME	18293					

AIRCRAFT CHECKED AND FOUND AIRWORTHY, PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature)

NOTES:

FEC EX. 2
w/ HUNT
MUR 2583 4/11/88

MartinAviation
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: K1204
STUART KARL
ATTN: RAMA WHITE
17942 COWAN
IRVINE, CA. 92714

INVOICE NO. 01844
INVOICE DATE 2/15/86

FLIGHT DATES: 2/06/86 to 2/06/86
ITINERARY : SNA SMO SNA

INVOICE NO. 01844

AIRCRAFT : 444CR

FLIGHT LOG NUMBER.. 7793

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	1.0	595.00	595.00	
Wait Hours				
Max Wait				
Rons				
		Total Flight Charge ..		595.00
		Total Misc. Charges ..		
		Sub-Total		595.00
		Transportation Tax ...		
		Flight Total		595.00

Comments
AUTH. BY: RAMA
PAX: MR. DOUG ROSEN AND
MR. STEVE RIVERS

*** TERMS: NET 15 ***

90

EXHIBIT THREE

Brokered To ARCMET AT [illegible] CALL OUT FEB 15 1986 WAITING FOR INVOICE 1-800-942-[illegible]469

FLIGHT LOG

MA Nº 7797

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 852-8300

05

Date: 2-11-12-13-86 ACFT: 841F F-50

PIC: SIC:

Sched. By: MIKE SEVERY Date: 2-4-86

AUTHORIZED BY: RAMA CUSTOMER: STUART KARL

ADDRESS: ON-FILE

QUOTE: PHONE: (W) 714-474-0355

AE BA MC CASH CHECK **CREDIT** PAID (H) C

ITINERARY: SNA TO SLC (5) 1300 SLC TO TEB (6) TEB TO DCA (6)
DCA TO SNA (6) TO ○ TO ○

PAX: Mr STUART KARL +16

LEG NO.	1	2	3	4	5	6
TOW						
MGTOW						
C.G. LOCATION						
C.G. LIMITS						

11.7	FLT. HOURS @ 2500.00 =	27,250.00
	WAIT HOURS @ =	
	MAX. WAITS @ =	
2	RON'S @ 475.00 =	990.00
1 FERRY	4.2 HRS @ 2200.00	9,240.00
	MISC @ =	0.00
	SUBTOTAL =	37,480.00
	FED. TAX 5% 8% =	3,153.40
	FLIGHT TOTAL =	42,632.40

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
1									+					
2									+					
3									+					
4									+					
5									+					
6									+					
			TRIP TOTALS						+					

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.						
TRIP TIME						
TOTAL TIME						

AIRCRAFT CHECKED AND FOUND AIRWORTHY; PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature)

NOTES: P/U GARY HUNT ID (SLC) AT INTERWEST JET CENTER

Give invoice to Mike Severy

FEC EX. #3 W/ HUNT MUR 2583 4/12/88 (HA)

NET 17067

1

PURCHASE ORDER

PURCHASE ORDER NUMBER
73131
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKING SLIPS, PACKAGES & CORRESPONDENCE

MartinAviation, Inc.

19331 Airport Way South
Santa Ana, California 92707
714/546-4300

TO Transportation Concepts SHIP TO Vicki 957-5761

ADDRESS _____ ADDRESS _____

CITY _____ STATE _____

DATE	DEPARTMENT	REQUISITION NO.	SHIP VIA	TERMS	RESALE PERMIT NO.
2-11-86	CLACTER	5110-05		2-24-86	SREA24097067

	QUANTITY ORDERED	QUANTITY RECEIVED	INVOICE NO.	DESCRIPTION	PRICE	NET
1				841F FALCON 50		
2				AIRCRAFT AT YOUR CALL		
3				SANDWICH TRAY / FRUIT	225 —	
4						
5						
6						
7				N/C TO STUART KALL		
8				PER M.S.		
9						
10						
11						
12						
13						
14						
15						
16						
17						
18						
19					225 —	

PLEASE SEND TWO (2) COPIES OF YOUR INVOICE WITH ORIGINAL BILL OF LADING.

Authorized Signature X Beth Stalnaker

ADM-1

VENDOR

STUART KARL FLT DATES: 11TH 12TH 13TH 1986

SUN-SLC-TEB-DCA-SNA

OUR COST FROM AIRCRAFT AT YOUR CALL

15.1 @	1800.00	=	27,180.00
2 Lnds @	300.00	=	600.00
			27,780.00

NET TO US
NO TAX NO COMM

BILL STUART KARL THIS PRICE

Lnds	11.7 @ 2500.00	=	29,250.00
Ferry	4.2 @ 2200.00	=	9,240.00
	Roos @ 495.00	=	990.00
			39,480.00
	8% TAX		3158.40
			42,638.40

DON'T CHG FOR CATERING ON THIS FLT.

11,700.00 PROFIT

MartinAviation
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: K1204
STUART KARL
ATTN: RAMA WHITE
17942 COWAN
IRVINE, CA. 92714

INVOICE NO. 01846
INVOICE DATE 2/15/86

FLIGHT DATES: 0/00/00 to 0/00/00
ITINERARY : SNA VIS SNA

INVOICE NO. 01846

AIRCRAFT : 841F

FLIGHT LOG NUMBER.. 7797

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	11.7	2,500.00	29,250.00	
Wait Hours	4.2	2,200.00	9,240.00	
Max Wait				
Rons	2	495.00	990.00	
		Total Flight Charge ..		39,480.00
		Total Misc. Charges ..		
		Sub-Total		39,480.00
		Transportation Tax ...		3,158.40
		Flight Total		42,638.40

Comments
SOUTH. BY: RAMA
WAIT CHARGES ARE ACTUALLY
THE FERRYING CHARGES

*** TERMS: NET 15 ***

THANK YOU FOR FLYING WITH MARTIN AVIATION, INC.

TELEPHONE: (714) 852-8300

9 | 9304356 EXHIBIT FOUR

FEB 27 1986

FLIGHT LOG

MA Nº 7923

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 852-8300

07

Date: 2-20/22-86 ACFT: 58FF

PIC: F. MUSSEN SIC: M.S KARL

Sched. By: MIKE SEVERY Date: 2-18-86

AUTHORIZED BY: RAMA CUSTOMER: STUART KARL

ADDRESS: ON-FILE

QUOTE: PHONE: (W) 714-474-0355

AE BA MC CASH CHECK [CREDIT] PAID (H)

ITINERARY: SNA TO DEN (1) 1700 DEN TO SNA (1) 1900 TO ( ) TO ( ) TO ( ) TO ( ) TO ( )

PAX: MR. STUART KARL

LEG NO.	1	2	3	4	5	6
TOW	15,078	15,500	12,500			
MAXTOW	16,800	17,000	14,600			
C.G. LOCATION	380.7	23.2%	23.8%			
C.G. LIMITS	378.5-387 ∅	14.1% - 30%	10.5% - 30%			

(1.2) FLT. 43 HOURS @ 1175.00 = 513850

WAIT HOURS @ =

MAX. WAITS @ =

2 RON'S @ 175.00 = 990.00
1 CATERING 131.3

2 1/F MISC @ 10.00 = 30.00

SUBTOTAL =

FUEL = 561.80
INTER. = 64.80
FBW = 64.36
= 356.72

FED. TAX 5% 8% = 491.88

FLIGHT TOTAL = 6771.74

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
1	1	02.20	DEN	8790.9 1807	8792.7 1957	1800	2000	1+50	2+00	2644	JFR			
2	3	02.22	LAX	8793.9 1353	8795.0 1600	1345	1605	2+07	2+20	2361	"			
3	1	2.22	SNA	8795.2 1620	8795.1 1636	1615	1640	∅:16	∅+25	331				
4									+					
5									+					
6								4.2	+					
				TRIP TOTALS				4:13	4+45					

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.	8790.9	8637.2	5000	7592.6	5672	5490
TRIP TIME	4.2	4.2	3	4.2	3	3
TOTAL	8795.1	8641.4	5003	7596.3	5675	5493

AIRCRAFT CHECKED AND FOUND AIRWORTHY; PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature)

NOTES: HAVE CATERING ONBOARD

4.2 FLT
2 RONS

ATMD = 4.4

MUR 2583; 4/12/88; W. HUNT EX. 4 (FEC)

****

*** LEAR 35 ***

WINTER: 1200 lb min P/L $1195.00 /Hr

Leg Num	From Apt	To Apt	Tru Crs	Dist nmi	Fuel Stops	ETE Hrs+Min	Allow load Pounds	Fuel Burn
1	SNA	DEN	56	723	0	1+58	3250	2569
2	DEN	SNA	244	723	0	2+ 7	3250	2713
Subtotals				1,445 nmi		4.1 Hour(s)		5,282 lbs

Flight time charges	$4,899.50
0.0 Individual standby hour(s)	$0.00
2 Overnight(s) (Incl one day's standby each)	$990.00
Extra items	$10.00
8% Tax	$471.96
Totals 1,445 nmi 4.1 Hour(s)	$6,371.46

****

DEN STAPLETON INT'L...DENVER CO

SNA JOHN WAYNE ARPT SANTA ANA CA
MARTIN AVIATION... NEXT TO AIRLINE TERMINAL

****

PURCHASE ORDER

PURCHASE ORDER NUMBER
73139
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKING SLIPS, PACKAGES & CORRESPONDENCE

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

TO Transportation Concepts SHIP TO Vicki 957-5761

ADDRESS _____ ADDRESS _____

CITY _____ STATE _____

DATE	DEPARTMENT	REQUISITION NO.	SHIP VIA	TERMS	RESALE PERMIT NO.
2-19-86	CHARTER	5110-07			SREA24097067

	QUANTITY ORDERED	QUANTITY RECEIVED	INVOICE NO.	DESCRIPTION	PRICE	NET
1				58FF DEPARTURE @ 1600		
2						
3				SANDWICH TRAY / VEGIES	64 00	
4				(4) PAX		
				KW + MS		
6						
7				MAIL = 7923		
8				S. KARL Chg'd		
9						
10						
11						
12						
13						
14						
15						
16						
17						
18						
19					64 00	

PLEASE SEND TWO (2) COPIES OF YOUR INVOICE WITH ORIGINAL BILL OF LADING.

Authorized Signature X Barb Stahlnecker

ADM-1

VENDOR

MartinAviation
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: K1204
STUART KARL
ATTN: RAMA WHITE
17942 COWAN
IRVINE, CA. 92714

INVOICE NO. 01964
INVOICE DATE 2/22/86

FLIGHT DATES: 2/20/86 to 2/22/86
ITINERARY : SNA DEN LAX SNA

INVOICE NO. 01964

AIRCRAFT : 58FF
PILOT IN COMMAND.... PHIL AMSDEN
SECOND IN COMMAND... MAURINE SAARI

FLIGHT LOG NUMBER.. 7923

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	4.3	1,195.00	5,138.50	
Wait Hours				
Max Wait				
Rons	2	495.00	990.00	
		Total Flight Charge ..		6,128.50
CATERING	1	131.36	131.36	
LANDING FEES	2	10.00	20.00	
		Total Misc. Charges ..		151.36
		Sub-Total		6,279.86
		Transportation Tax ...		491.88
		Flight Total		6,771.74

Comments
AUTH. BY: RAMA
PAX: STUART KARL + 2 OTHERS
FROM DEN TO LAX

*** TERMS: NET 15 ***

94 Y

930435 EXHIBIT FIVE

MAR 15 1986

FLIGHT LOG

MA Nº 8136

11.7 2.7 2 RONS

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 852-8300 07

Date: 3-10-11-12-86 ACFT: 58FF

PIC: P. AMSDEN SIC: R. WATSON

Sched. By: MIKE SEVERY Date: 3-4-86

AUTHORIZED BY: RAMA CUSTOMER: STUART KARL

ADDRESS: ON-FILE

QUOTE: PHONE: (W) 714-474-0355

(H) C

AE BA MC CASH CHECK CREDIT PAID

ITINERARY: SNA to CUG 3.10 1700 CUG to DCA 3.11 DCA to TEB 3.11

TEB to SNA TO TO

PAX: MR STUART KALL

LEG NO.	1	2	3	4	5	6
TOW	15,700	16,800	14,000	17,401	16,500	
MATOW	17,500	17,100	15,300	18,000	17,800	
C.G. LOCATION	378 8	22.8%	21.8%	19.2%	22%	
C.G. LIMITS	374.3-387.6	16.4%-30%	11.7%-30%	17.4%-30%	15.8%-30%	

(11.6)	FLT. 11.7 HOURS @ 1195	=	13,981.50
2.7	WAIT HOURS @ 50	=	135.00
	MAX. WAITS @	=	
2 outer LIE	RON'S @ 495	=	990.00
flight phone	MISC @ 4 @ 25.	=	100.00
	SUBTOTAL	=	623.52
	FED. TAX 5% 8%	=	1220.72
	FLIGHT TOTAL	=	17103.19

2 @ 608 = 1216
CIE = 52.57
fuel = 2776.53
Lon = 417.08

LEG NO.	PAX	DATE	DEPT SNA	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED
1	4	03.10	SLN	8717.9 1815	8822.3 2038	1809	2040	2+23	2+31	2617
2	"	"	DCA	2107	2333	2100	2338	2+26	2+38	2864
3	"	03.11	TEB	1252	1332	1241	1336	0:40	0+55	1032
4	6	03.12	SLN	1603 ~~1535~~	8825.7 1120	1535 ~~1603~~	1923	3 ~~+55~~ 17	3 ~~+20~~ 48	4101
5	"	"	SNA	1959	8831.5 2247	1950	2250	2:48	3+00	3438
6									+	
			TRIP TOTALS					~~12:07~~ 11:37	+	

ROUTE	ALT	ETE	FOB
IFR			

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.	8819.9	8666.2	5022	2620.1	5694	5512
TRIP TIME	11.6 ~~12.~~	11.6 ~~12.~~	5	11.6 ~~12.~~	5	5
TOTAL TIME	8831.5 ~~8832.3~~	8677.8 ~~8678.6~~	5027	2631.7 ~~2632.5~~	5699	5517

AIRCRAFT CHECKED AND FOUND AIRWORTHY; PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature)

NOTES: 12.6 FLT
2 RONS

BUTLER FLY BY DCA

X NUMEROUS PHONE CALLS USING QM 60994-182 SPECIFICALLY: 03.10 to 913.825.6739
03.12 TO " " "
03.17 TO 714.852.8300
to this.

FEC EX. # 5 4/12/88 witness: HUNT MUR 2583

MartinAviation
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: KIPP
STUART KARL
ATTN: RAMA WHITE
17942 COWAN
IRVINE, CA. 92714

INVOICE NO. 02150
INVOICE DATE 3/12/86

FLIGHT DATES 3/10/86 to 3/12/86
ITINERARY : SNA SLP PCA TER SLN SNA

INVOICE NO. 02150

AIRCRAFT : 58TF
PILOT IN COMMAND.... PHIL AMSDEN
SECOND IN COMMAND .. RON WATSON

FLIGHT LOG NUMBER.. 8136

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	11.7	1,195.00	13,981.50	
Wait Hours	2.7	50.00	135.00	
Max Wait				
Trips	2	495.00	990.00	
		Total Flight Charge ..		15,106.50
CATERING	1	623.38	623.38	
LANDING FEES	1	52.59	52.59	
FLITE PHONE CHARGES	4	25.00	100.00	
		Total Misc. Charges ..		775.97
		Sub-Total		15,882.47
		Transportation Tax ...		1,220.72
		Flight Total		17,103.19

Comments
OUTBOUND: S. KARL + 3
INBOUND: S. KARL + 5

*** TERMS: NET 15 ***

Exhibit Six

MAR 15 198

FLIGHT LOG

MA № 8170

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 852-8300

03

Date: 3-14-86 ACFT: L-1

PIC: SIC:

Sched. By: MIKE SEVERY Date: 3-7-86

AUTHORIZED BY: RAMA CUSTOMER: STUART KARL

ADDRESS: ON-FILE

QUOTE: PHONE: (W) 714-474-0355

AE BA MC CASH CHECK **CREDIT** PAID (H)

ITINERARY: SNA TO SMO @ 1500 SMO TO SNA @ 1600 TO

TO TO TO

PAX: ✱ SENATOR GARY HART + 4

LEG NO.	1	2	3	4	5	6
TOW						
MGTOW						
C.G. LOCATION						
C.G. LIMITS						

1.0	FLT. HOURS @ 595	= 595.00
1.0	WAIT HOURS @ 50	= 50.00
	MAX. WAITS @	=
	RON'S @	=
	MISC @	=
	SUBTOTAL	=
	FED. TAX 5% 8%	=
	FLIGHT TOTAL	= 645.00

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED
			SNA							
1	3	3/14	SMO	1854.5	1855.5	1500	1700	1.0	+	
2									+	
3									+	
4									+	
5									+	
6									+	
						TRIP TOTALS		1.0	+	

ROUTE	ALT	ETE	FOB

NOTES: P/U AT (SMO)

SENATOR GARY HART

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.	18565					
TRIP TIME	1.0					
TOTAL TIME	18570					

AIRCRAFT CHECKED AND FOUND AIRWORTHY; PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature)

FEC Ex. #6 w/ HUNT 4/12/88 (tt)
MUR 2583

MartinAviation
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: K1204
STUART KARL
ATTN: RAMA WHITE
17942 COWAN
IRVINE, CA. 92714

INVOICE NO. 02186
INVOICE DATE 3/14/86

FLIGHT DATES: 3/14/86 to 3/14/86 INVOICE NO. 02186
ITINERARY : SNA SAD SNA

AIRCRAFT : 444CP FLIGHT LOG NUMBER.. 3170

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	1.0	395.00	395.00	
Wait Hours	1.0	50.00	50.00	
Max Wait				
Runs				
		Total Flight Charge ..		445.00
		Total Misc. Charges ..		
		Sub-Total		445.00
		Transportation Tax ...		
		Flight Total		445.00

Comments
DISP. BY: RAMA
PICK UP SENATOR GARY HART

*** TERMS: NET 15 ***

THANK YOU FOR FLYING WITH MARTIN AVIATION, INC. TELEPHONE: (714) 852-8300

98 Thur

Exhibit Seven

ISW APR 21 1986

FLIGHT LOG

MA № 8406

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 852-8300

07

Date: 4-3-86 ACFT: LR-35 (37914)

PIC: P.A. MASON SIC: J. BECK

Sched. By: MIKE SEVERY Date: 3-26-86

AUTHORIZED BY: RAMA CUSTOMER: KARL LORIMAR

ADDRESS: ON-FILE

QUOTE: PHONE: (W) 214-474-0355

AE BA MC CASH CHECK CREDIT PAID (H)

ITINERARY: SNA TO SFO 1000 SFO TO SMO 1700 SMO TO SNA (0)

TO TO TO

+3 = (7)

PAX: MR. STUART KARL / MR. CORT SHANNON / JEFF JENEST / MR. GARY HUNT

LEG NO.	1	2	3	4	5	6
TOW	16323	14823	13,200			
MATOW	17,000	16,600	15,700			
C.G. LOCATION	376.7	373.8	375.5			
C.G. LIMITS	375.0 - 387.0	373.1 - 387.0	370.8 - 387.0			

(2.2)	FLT. HOURS @ 1195.00	=	2748.50
(9.2)	WAIT HOURS @ 50.00	=	455.00
	MAX. WAITS @	=	
	RON'S @	=	
1 CATERING		157.30	157.30
1 L/F	MISC @ 27.36	=	27.36
	SUBTOTAL	=	3388.16
	FED. TAX 5% 8%	=	258.46
	FLIGHT TOTAL	=	3646.62

LEG NO.	PAX	DATE	DEPT	HOBBS		BLOCK		TOTAL TIME		FUEL USED	ROUTE	ALT	ETE	FOB
			SNA	TAKEOFF	LANDING	TAKEOFF	LANDING	HOBBS	BLOCK					
1	7	4.03	SFO	1029.4	1030.5	1100	1220	1.1	1+20	1428	IFR			
2	6	"	SMO	1030.5	1031.4	1635	1745	.9	1+10	1017	" IN 2125 OUT 1000			
3	2	"	SNA	1031.4	1031.4	2055	2125	.2	.30	394	" 11:25 - 2:12 = 9:13			
4									+		9.2 START 2.2 FLT			
5									+					
6									+					
						TRIP TOTALS		2.2	+					

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.	2254.2	2254.2	1892	2254.2	1892	1892
TRIP TIME	2.2	2.2	3	2.2	3	3
TOTAL TIME	2256.4	2256.4	1895	2256.4	1895	1895

AIRCRAFT CHECKED AND FOUND AIRWORTHY; PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED

PIC (Signature)

NOTES: SFO Butler Aviation

HAVE CATERING ONBOARD DANISH I=Plus

(2) DP on board

~~Deluxe Sandwich~~ - ~~Date~~ OUT OF SFO

SEA FOOD

FEC #7 witness: HUNT MUR 2583 4/12/88 (#)

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: K1205
KARL- LORIMAR HOME VIDEO
17942 COWAN
IRVINE, CA. 92714

INVOICE NO. 02419
INVOICE DATE 4/03/86

FLIGHT DATES: 4/03/86 to 4/03/86
ITINERARY : SNA SFO SMO SNA

INVOICE NO. 02419

AIRCRAFT : 37984
PILOT IN COMMAND.... PHIL AMSDEN
SECOND IN COMMAND... JEFF BECK

FLIGHT LOG NUMBER.. 8406

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	2.3	1,195.00	2,748.50	
Wait Hours	9.1	50.00	455.00	
Max Wait				
Rons				
		Total Flight Charge ..		3,203.50
CATERING	1	157.30	157.30	
LANDING FEE	1	27.36	27.36	
		Total Misc. Charges ..		184.66
		Sub-Total		3,388.16
		Transportation Tax ...		258.46
		Flight Total		3,646.62

Comments
AUTH. BY: RAKA WHITE
S. KARL, C. SHANNON, G. HUNT
J. JENEST + 3 OTHERS

*** TERMS: NET 15 ***

22

[THURSDAY] [RETURN TO DCA] EXHIBIT EIGHT

FLIGHT LOG

MA Nº 8522

Martinaire Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 852-8300

07

Date: 4/15/18-86 ACFT: N37984

PIC: P. AMSDEN SIC: G.O'DELL

Sched. By: MIKE SEVERY Date: 4-8-86

AUTHORIZED BY: RAMA WHITE CUSTOMER: KARL-LORIMAR

ADDRESS: ON-FILE

QUOTE: 19,910.88 PHONE:(W) 714-474-0355

AE BA MC CASH CHECK **CREDIT** PAID (H)

ITINERARY: SNA TO LAX (4/15 TUE) ⓪ 1830 LAX TO TEB ④ 1900 TEB TO DCA (4/16 WED) ① 1730

DCA TO TEB ④ 1900 TEB TO DCA (4/18 FRI) ④ 0700 DCA TO ANG ④ 1100

PAX: STUART KARL GARY HUNT CORT SHANNON JEFF JENEST

LEG NO.	1	2	3	4	5	6
TOW	15,000	16,100	15,800	16,100	16,100	15,300
MAX TOW	15,600	18,300	16,300	16,300	16,300	16,300
C.G. LOCATION	379.1	378.9	380.0	380.0	378.9	379.5
C.G. LIMITS	373.4-387.6	374.7-387.6	374.5-387.6	374.7-387.6	374.7-387.6	373.9-387.6

FLT. HOURS @ _____ = _____

WAIT HOURS @ _____ = _____

MAX. WAITS @ _____ = _____

RON'S @ _____ = _____

MISC @ _____ = _____

SUBTOTAL = _____

FED. TAX 5% 8% = _____

FLIGHT TOTAL = _____

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
1	3	4.15	LAX	1058.1	1058.4	1908	1938	0.3	0+30	368	IFR			
2	4	"	SLN	1058.4	1060.7	2024	2255	2.3	2+31	2721				
3	"	"	TEB	1060.7	1063.5	2336	0225	2.8	2+55	2213				
4	2	4-16	DCA	1063.5	1064.2	1408	1530	0.7	1+22	1064				
5	4	"	TEB	1064.2	1065.0	1705	1755	0.8	0+50	834				
6	1	4.17	DCA	1065.0	1065.6	0657	0755	0.6	+58	951				
					TRIP TOTALS			7.5	+					

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.	2282.8	2282.8	1912	2282.8	1912	1914
TRIP TIME	7.5	7.5	6	7.5	6	6
TOTAL TIME	2290.3	2290.3	1918	2290.3	1918	1920

AIRCRAFT CHECKED AND FOUND AIRWORTHY; PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature)

NOTES: SEE CHARTER QUOTE →

FOR DETAILS

201.236.0100 - LOEWS GLEN ROYAL TE HOTEL

(DONNA LOWE 4/14)

PHONE CALL 4.17.86: 202.224.0518/RM 69009-182

Doc Seal

FEC witness! EX. # 8 MUR 2583 HUNT 4/12/88 (HH)

TUESDAY 1 | LEAK ON #1

Date: 4-18-86 ACFT: N37984 4 3 5

PIC: P. RAMSDEN SIC: G.O'DELL

Sched. By: MIKE SEVERY Date: 4-8-86

FLIGHT LOG

MA № 8515

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 852-8300

AUTHORIZED BY: RAMA WHITE CUSTOMER: KARL - LORIMAR

ADDRESS: ON-FILE

QUOTE: PHONE: (W) 714-474-0355

AE BA MC CASH CHECK **CREDIT** PAID (H)

ITINERARY: YNG to SNA (5) 1300 (4/18 FRI) TO TO TO TO TO TO

PAX:

LEG NO.	1	2	3	4	5	6
TOW	/	16,000	16,915	15,700		
MATOW	91	16,300	18,300	18,000		
C.G. LOCATION		375.7	379.4	376.7		
C.G. LIMITS	/	374.7-377.4	374.4-387.6	374.4-387.6		

14.5

(14.1) FLT. HOURS @ 1195.00 = 17,307.50

WAIT HOURS @ =

MAX. WAITS @ =

3 RON'S @ 495.00 = 1485.00

1 VIDEO EQUIP 168.40 168.40

1 IFF HOMING 70.00 70.00

1 CATERING MISC @ 436.01 = 436.01

SUBTOTAL = 19,486.91

FED. TAX 5% 8% = 1510.60

FLIGHT TOTAL = 20,997.51

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
			DCA											
1	ϕ	4.17	TEB	1065.6	1066.4	0903	1003	ϕ.8	1+00	1118	IFR			
2	4	4.18	YNG	1066.4	1067.3	1005	1110	.9	1+05	1293				
3	4	4.18	PUB	1067.3	1070.3	1140	1450	3.0	3+10	3617	14.1 FLT 3 RONS			
4	6	4-18	SNA	1070.3	1072.2	1510	1720	1.9	2+10	2365				
5									+					
6								14.1	+					
						TRIP TOTALS		6.6	+					

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.	2290.3	2290.3	1918	2290.3	1918	1920
TRIP TIME	6.6	6.6	4	6.6	4	4
TOTAL TIME	2296.9	2296.9	1922	2296.9	1922	1924

AIRCRAFT CHECKED AND FOUND AIRWORTHY, PREFLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature)

NOTES:

216 356 - PX - 04-18-86 QH 6929-IFR

74 352 536 04-15-86 QH 6927-IFR

CHARTER QUOTE SHEET

DATE OF FLIGHT: 4-15/18-86

DATE OF CHARTER QUOTE: 4-8-86 CONTACT PERSON: RAMA White

CUSTOMER NAME: KARL-LORIMAR ADDRESS: ON-FILE

AIRCRAFT QUOTED: LEAR-35A RATE QUOTED: 1195.00

FORM OF PAYMENT: CREDIT

AMERICAN EXPRESS: _____ BANK AMERICARD: _____ MASTERCARD: _____ VISA CARD: _____ CHECK: _____

CASH: _____ CREDIT CARD NUMBER: _____ APPROVAL CODE: _____

LEG#	FROM:	TO:	D/T:	RON:	STBY:	ETA:	NO. PAX:
1. 4-15-86	SNA	LAX	1830	~~0~~	1.0	1800	~~0~~ 2
2. 4-15-86	LAX	TEB	1900	3	0	0300	4 PAX
3. 35039 4-16-86	TEB	DCA	1200Z 0700L 1730	↑	0	1830	1 PAX
4. 35040 4-16-86	DCA	TEB	0700Z 2100L 1900	↑	0	2000	4 PAX
5. 35413 4-18-86	TEB	DCA	1245Z 0745L 0700	~~3.0~~	3.0	0745	4 PAX
6. 35415 4-18-86	DCA	YNG	1600Z 1100L 1100	~~0~~	~~0~~	1200	4 PAX
7. 4-18-86	YNG	SNA	1300	~~0~~	1.0	1530	5 PAX
8.							

TYPE OF CATERING REQUIRED: HAVE SEAFOOD TRAY PLUS SANDWICH TRAY (6 PAX ONBOARD FOR LAX-TEB AND FROM DCA-YNG-SNA HAVE BEER AND CHAMPAGNE ONBOARD ALWAYS —

PASSENGER NAMES: 1. STUART KARL 2. GARY HUNT

3. CORT SHANNON 4. JEFF JENEST

5. _____ 6. _____

7. _____ 8. _____

BROKERED FLIGHT INFORMATION:

PHONE NUMBER:

930435329

PURCHASE ORDER

72993.

THIS NUMBER MUST APPEAR ON ALL INVOICES PACKING SLIPS PACKAGES & CORRESPONDENCE

MartinAviation, Inc.

19331 Airport Way South
Santa Ana, California 92707
714/546-4300

TO The Ultimate in Catering
Rudy's Restaurant

SHIP TO

ADDRESS 107 Anderson St

ADDRESS

CITY Hackensack STATE N.J. 07601

DATE	DEPARTMENT	REQUISITION NO	SHIP VIA	TERMS	RESALE PERMIT NO
4.16.86	Charter	5110-07		5.24.86	SREA24097067

	QUANTITY		INVOICE NO	DESCRIPTION	PRICE	NET
1				4.16 NO 26486	63 60	
2				4.17 26505	31 80	
3	0			4.18 26528	89 04	
4						
5				STUART HALL CATERING		
6				#8515		
7						
8				Chg'd.		
9						
10						
11						
12						
13						
14						
15						
16						
17						
18						
19					184 44	

PLEASE SEND TWO (2) COPIES OF YOUR INVOICE WITH ORIGINAL BILL OF LADING

Authorized Signature X Ruth Italiano

VENDOR

PURCHASE ORDER

73076

THIS NUMBER MUST APPEAR ON ALL INVOICES PACKING LISTS PACKAGES & CORRESPONDENCE

MartinAviation, Inc.

19331 Airport Way South
Santa Ana, California 92707
714/546-4300

TO Transportation Concept

SHIP TO Vicki

ADDRESS

ADDRESS

CITY

STATE

DATE	DEPARTMENT	REQUISITION NO	SHIP VIA	TERMS	RESALE PERMIT NO
4/15	Charter	5110-07		5-24-86	SREA24097067

	QUANTITY ORDERED	QUANTITY RECEIVED	INVOICE NO	DESCRIPTION	PRICE	NET
1				PA/CO N 3794Y		
2				#8522 Mark-Lorimar		
3	—				210 00	
4	3					
5	3			Seafood Tray - Sandwich Tray		I=
6				Grapes (Deluxe)		
7	3					
8	5			To Be Delivered at 1630		
9	2					
10	4			Chg'd customer		
11	3					
12	9					
13						
14						
15						
16						
17						
18						
19					210 00	

PLEASE SEND TWO (2) COPIES OF YOUR INVOICE WITH ORIGINAL BILL OF LADING

Authorized Signature X Vicki Italiano

VENDOR

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

: 205
KARL- LORIMAR HOME VIDEO
17942 COWAN
IRVINE, CA. 92714

INVOICE NO. 02560
INVOICE DATE 4/18/86

LIGHT DATES: 4/17/86 to 4/18/86 INVOICE NO. 02560
TINERARY : SNA LAX SLN TEB DCA TEB DCA TEB YNG PUB SNA

IRCRAFT : 37984 FLIGHT LOG NUMBER.. 8515
'ILOT IN COMMAND.... PHIL AMSDEN
ECOND IN COMMAND... GARY ODELL

Description Of Charge	Units	Rate	Extension	Totals
light Hours	14.5	1,195.00	17,327.50	
ait Hours				
ax Wait				
ons	3	495.00	1,485.00	
		Total Flight Charge ..		18,812.50
IDEO EQUIPMENT RENTAL	1	168.40	168.40	
/F & HANGAR	1	70.00	70.00	
ATERING	1	436.01	436.01	
		Total Misc. Charges ..		674.41
ments				
THORIZED BY:		Sub-Total		19,486.91
RAMA		Transportation Tax ...		1,510.60
		Flight Total		20,997.51

*** TERMS: NET 15 ***

NK YOU FOR FLYING WITH MARTIN AVIATION, INC. TELEPHONE: (714) 852-8300

99

2304353

Exhibit NINE

APR 21 1986

FLIGHT LOG

MA Nº 10236

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 546-4300

03

Date: 04/15/86 ACFT: N. 21834

PIC: O. Dargle SIC:

Sched By: Date: 04/15/86

AUTHORIZED BY: Doug Rosen CUSTOMER: Karl Lorimer

ADDRESS:

QUOTE: PHONE: (W)

(H)

AE BA MC CASH CHECK **CREDIT** **PAID**

ITINERARY: TO TO TO

TO TO TO

PAX:

LEG NO.	1	2	3	4	5	6
TOW						
MGTOW						
C.G. LOCATION						
C.G. LIMITS						

2.7	FLT. HOURS @ MC of 350.00 =	945.00
2.0	WAIT HOURS @ 50.00 =	100.00
	MAX. WAITS @ =	
	RON'S @ =	
1	TYLER MOUNT MISC @ =	370.00
	SUBTOTAL =	1415.00
	FED. TAX 5% 8% =	1415.00
	FLIGHT TOTAL =	1415.00

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
1	3	4/15	SMO	10220.1	10223.8	1100	1540	2.7	4.7					
2									+					
3									+					
4									+					
5									+					
6									+					
					TRIP TOTALS			2.7	2.0					

	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
FLT TIME						
TIME FWD.	1232.2					
TRIP TIME	2.7					
TOTAL TIME	1234.9					

AIRCRAFT CHECKED AND FOUND AIRWORTHY: PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED

PIC (Signature)

NOTES: Provided Tyler Mount

~~$300.00~~ cost

$370.00 charge to client

FEC # 9
Witness: HUNT
MUR 25883
4/2/88

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: K1205
KARL- LORIMAR HOME VIDEO
17942 COWAN
IRVINE, CA. 92714

INVOICE NO. 02506
INVOICE DATE 4/15/86

FLIGHT DATES: 4/13/86 to 4/15/86
ITINERARY : SNA SMO SNA

INVOICE NO. 02506

AIRCRAFT : 2183Y

FLIGHT LOG NUMBER.. 10236

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	2.7	395.00	1,066.50	
Wait Hours	2.0	50.00	100.00	
Max Wait				
Mons				
		Total Flight Charge ..		1,166.50
TYLER MOUNT	1	350.00	350.00	
		Total Misc. Charges ..		350.00
		Sub-Total		1,516.50
		Transportation Tax ...		
		Flight Total		1,516.50

Comments
AUTH. BY: DOUG ROSEN
SMO = SANTA MONICE
PHOTO FLIGHT

*** TERMS: NET 15 ***

TUESDAY 1.1.86 — 11/25 — EXHIBIT TEN — 1-800-221-0197

Date: 6-24-86 ACFT: LR 321AC
PIC: SIC:
Sched. By: MIKE SEVERY Date: 6-20-86

FLIGHT LOG

MA Nº 10483

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 546-4300

AUTHORIZED BY: RAMA CUSTOMER: STUART KARL
ADDRESS: ON-FILE
QUOTE: PHONE: (W) 714-474-0355
(H)

AE BA MC CASH CHECK **CREDIT** PAID

ITINERARY: BWI 1230 TEB to DCA 1330 DCA to TEB 1630 TO TO TO TO

PAX: MR STUART KARL

LEG NO.	1	2	3	4	5	6
TOW						
MGTOW						
C.G. LOCATION						
C.G. LIMITS						

2.0	FLT. HOURS @	1485.00 =	2970.00
	WAIT HOURS @	=	
	MAX. WAITS @	=	
	RON'S @	=	
1 CATERING		56.92 =	56.92
1 H/F - PARK	MISC @	117.30 =	117.30
	SUBTOTAL	=	3144.22
	FED. TAX 5% 8%	=	246.98
	FLIGHT TOTAL	=	3391.20

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED
1									+	
2									+	
3									+	
4									+	
5									+	
6									+	
							TRIP TOTALS		+	

ROUTE	ALT	ETE	FOB
2x1235 56.92 (qty.)			
1x1+pk 117.30			

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.						
TRIP TIME						
TOTAL TIME						

AIRCRAFT CHECKED AND FOUND AIRWORTHY; PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature)

NOTES: MEETING WITH SENATOR GARY HART — PUT ON Bill —

$

Net-Net 2570

2644.22

FEC EX. MUR 2583 #10 — 4/28/88

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: K1295
KARL - LORIMAR HOME VIDEO
17942 COWAN
IRVINE, CA. 92714

INVOICE NO. 03852
INVOICE DATE 7/01/84

FLIGHT DATES: 6/24/84 to 6/24/84
ITINERARY : TEB DCA TEB

INVOICE NO. 03852

AIRCRAFT : 324AC

FLIGHT LOG NUMBER.. 10483

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	2.0	1,485.00	2,970.00	
Wait Hours				
Max Wait				
Rons				
		Total Flight Charge ..		2,970.00
CATERING	1	56.92	56.92	
LANDING & PARKING	1	117.30	117.30	
		Total Misc. Charges ..		174.22
		Sub-Total		3,144.22
		Transportation Tax ...		246.98
		Flight Total		3,391.20

Comments
MEETING WITH SENATOR HART
AUTHORIZED BY: RAGA

*** TERMS: NET 15 ***

[illegible] LK-331 EXHIBIT EIGHTEEN Brokered To SKYBIRD AVIATION

FLIGHT LOG

MA Nº 09987

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 546-4300

Date: 7-10-11-86 ACFT: N551DB

PIC: SIC:

Sched. By: MIKE SEVERY Date: 7-9-86

AUTHORIZED BY: RAMA CUSTOMER: STUART KARL

ADDRESS: ON-FILE

QUOTE: PHONE: (W) 714-474-0355

AE BA MC CASH CHECK CREDIT PAID (H) (Thru) (Fri)

ITINERARY:
7-10-86 VNY to SNA (0) 0830
7-10-86 SNA to ACK (7) 1000
7-11-86 ACK to DEN (3) PM
DEN to VNY (0)
to
to

PAX: MR STUART KARL + FAMILY

LEG NO.	1	2	3	4	5	6
TOW						
MGTOW						
C.G. LOCATION						
C.G. LIMITS						

10.1	FLT. HOURS @ 1800.00	=	18,180.00
	WAIT HOURS @	=	
	MAX. WAITS @	=	
1	RON'S @ 495.00	=	495.00
1 CATERING	110.00		110.00
1 H/F	MISC @ 45.00	=	45
	SUBTOTAL	=	18830.00
	FED. TAX 5% 8%	=	1477.60
	FLIGHT TOTAL	=	20 327.60

TO BLOCK IN = 10.3 BLOCK TIME
10.1

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
1									+					
2									+					
3									+					
4									+					
5									+					
6									+					
						TRIP TOTALS			+					

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.						
TRIP TIME						
TOTAL TIME						

AIRCRAFT CHECKED AND FOUND AIRWORTHY. PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature)

NOTES: HAVE EXTRA SANDWICHS ON BOARD FOR (7) PAX + VEGI TRAY + SWEET ROLLS O.J. FRESH Squeezed

Total 576.27 + 77.33

FEC Ex. #11 W. HUNT MUR 2583 4/12/88 (HA)

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: K1204
STUART KARL
ATTN: KAMA WHITE
17242 COMAN
IRVINE, CA. 92714

INVOICE NO. 04103
INVOICE DATE 7/31/96

FLIGHT DATES: 7/10/96 to 7/10/96 INVOICE NO. 04103
ITINERARY : SNA ACK DEN

AIRCRAFT : 5510E FLIGHT LOG NUMBER.. 2987

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	10.1	1,200.00	10,180.00	
Wait Hours				
Max Wait				
Rons	1	295.00	295.00	
		Total Flight Charge ..		10,475.00
CATERING	1	110.00	110.00	
LANDING FEE	1	35.00	35.00	
		Total Misc Charges ..		145.00

Comments
AUTHORIZED BY: STUART KARL
PAX: STUART KARL + FAMILY

Sub-Total 10,620.00
Transportation Tax ... 707.40

Flight Total 11,327.40

*** TERMS: NET 15 ***

118 FRIDAY AR385A 435 EXHIBIT 9 Twelve JUL 07

FLIGHT LOG

MA № 09820

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 546-4300

Date: 7-11-86 ACFT: N237GA
PIC: BGARCIA SIC: TCRUEHLE
Sched. By: MIKE SEVERY Date: 7-11-86

AUTHORIZED BY: STUART KARL CUSTOMER: STUART KARL
ADDRESS: ON - FILE
QUOTE: PHONE: (W)
(H)

AE BA MC CASH CHECK CREDIT PAID

ITINERARY: SNA TO DEN (2) DEN TO LGB (1) LGB TO SNA (0)
TO (0) TO (0) TO (0)

PAX: MR George KARL

LEG NO.	1	2	3	4	5	6
TOW	/	14.5	/			
MGTOW	GI	17.3	GI			
C.G. LOCATION	/	328.1				
C.G. LIMITS		325 - 347	/			

4.2 (4.0) FLT. HOURS @ 1195.00 = 5019.00
WAIT HOURS @ =
MAX. WAITS @ =
RON'S @ =
1 PARKING MISC @ 18.00 = 18.00
SUBTOTAL = 5037.00
FED. TAX 5% 8% = 402.96
FLIGHT TOTAL = 5439.96

F. EX = 366.20
PARK. 15-18.00

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
1	Ø	7-11	DEN	279.1	2521.0	1945	2198	~~1.9~~	1+10	2303	IFR			
2	1	7-11	LGB	2521.0	2522.9	2210	2415 0015	1.9	2+05	2241	↓			
3	0	7-12	LGB	2522.9	2523.1	2415 0025	0044	.2	+20	288				
4									+					
5									+					
6									+					
							TRIP TOTALS	4.0	3+35	4832				

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.						
TRIP TIME						
TOTAL TIME						

AIRCRAFT CHECKED AND FOUND AIRWORTHY; PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature)

NOTES: CREW RETURNED TO SNA VIA M/S's TRUCK; ARRIVED SNA 0200. UNABLE TO RTN AC TO SNA because AIRPORT WAS closed. TC

FEC EX # 12
MUR. HUNT 25833 4/21/88

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: K1205
KARL- LORIMAR HOME VIDEO
17942 COWAN
IRVINE, CA. 92714

INVOICE NO. 03896
INVOICE DATE 7/12/84

FLIGHT DATES: 7/11/84 to 7/12/84
ITINERARY : SNA DEN LGB SNA

INVOICE NO. 03896

AIRCRAFT : 237GA
PILOT IN COMMAND.... ROBERT GARCIA
SECOND IN COMMAND... - TERESE ROEHLE

FLIGHT LOG NUMBER.. 9920

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	4.2	1,195.00	5,019.00	
Wait Hours				
Max Wait				
Pons				
		Total Flight Charge ..		5,019.00
LANDING FEE	1	18.00	18.00	
		Total Misc. Charges ..		18.00
		Sub-Total		5,037.00
		Transportation Tax ...		402.96
		Flight Total		5,439.96

Comments
AUTHORIZED BY: STUART KARL
PAX: MR. GEORGE KARL

*** TERMS: NET 15 ***

THANK YOU FOR FLYING WITH MARTIN AVIATION, INC. TELEPHONE: (714) 852-8300

MONDAY

LR35A

Exhibit Thirteen

JUL 2 9 1988

FLIGHT LOG

MA Nº 10008

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 546-4300

Date 7-21 To 7-26 ACFT: N 37984

PIC: P. AMSDEN SIC: T. C RUEHLE

Sched. By MIKE SEVERY Date: 7-21-86

AUTHORIZED BY: GARY HUNT CUSTOMER: KARL-LORIMAR

ADDRESS: ON-FILE

QUOTE: PHONE: (W) 714-474-0355

AE BA MC CASH CHECK CREDIT PAID (H)

ITINERARY: SNA to PDX (3) 1630 PDX to MSP (2) MSP to ORD (1)
ORD to PIT (1) PIT to CLE (0) CLE to BUF (0)

PAX: MR GARY HUNT +

LEG NO.	1	2	3	4	5	6
TOW	15,100	15,900	13,500	13,500	13,500	14,000
MTOW	18,100	17,900	16,600	16,800	16,300	16,800
C.G. LOCATION	379.2	381.6	379.5	381.7	381.7	380.2
C.G. LIMITS	373.5-387.4	374.7-387.6	371.3-387.4	371.3-387.6	371.3-357.4	372.3-387.4

FLT. HOURS @ =
WAIT HOURS @ =
MAX. WAITS @ =
RON'S @ =
MISC @ =
SUBTOTAL =
FED. TAX 5% 8% =
FLIGHT TOTAL =

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
			SNA											
1	3	7.21	GJT	1242.7	1244.7	1700	1912	2.0	2+15	2427	IFR			
2	3	7.21	MSP	1244.7	1246.5	1938	2135	1.8	1+57	2043				
3	2	"	ORD	1246.5	1247.3	2158	2300	.8	1+02	1138				
4	1	7.22	PIT	1247.3	1248.3	0921	1033	1.0	1+12	1261				
5	1	7.22	DTW	1248.3	1249.0	1247	1340	.7	.53	994				
6	1	7.22	TED	1249.4	1250.1	1615	1740	1.1	1+25	1378				
						TRIP TOTALS		7.4	+					

FLT TIME	AIRFRAME	ENG NO. 1	CYCLES	ENG NO. 2	CYCLES	LDGS
TIME FWD.	2467.4	2467.4	2069	24674	2065	2079
TRIP TIME	7.4	7.4	6	7.4	6	6
TOTAL TIME	2474.8	2474.8	2075	24748	2071	2085

AIRCRAFT CHECKED AND FOUND AIRWORTHY; PREFLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED

PIC (Signature)

NOTES: PILOTS = FLY AS DIRECTED BY MR GARY HUNT OF KARL LORIMAR — 4/5
ORD - HAVE TAXI WAITING FOR MR HUNT - LINCOLN WOOD HYATT HOUSE —

163

4/12/88 MUR 2583 W/ HUNT FEC #13

HH

PHOENIX

MONDAY

XR-35A 4 3 5 3 3 4 2

JUL 2 9 1986

FLIGHT LOG

MA Nº 10010

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 546-4300

Date: 7-21 - 7-26 ACFT: N37984

PIC: D. AMSDEN SIC: T. RUETHE

Sched. By: MIKE SEVERY Date: 7-21-86

AUTHORIZED BY: GARY HUNT CUSTOMER: KARL-LORIMAR

ADDRESS: ON-FILE

QUOTE: PHONE: (W) 714-474-0355

AE BA MC CASH CHECK [CREDIT] PAID (H)

ITINERARY: BWI TO PIE ○ PIE TO LGA ○ LGA TO ACK ○
ACK TO SLN ○ SLN TO SNA ○ TO ○

PAX:

LEG NO.	1	2	3	4	5	6
TOW	15,000	13,100	~~12,000~~ /	13,000	16,400	17,000
MGTOW	15,900	15,900		16,300	17,000	17,200
C.G. LOCATION	~~350~~ 2	383.4	91	383.2	381.7	380.2
C.G. LIMITS	372.3-357.4	371.9-387.4	/ ~~2487.4~~	371.8-357.4	374.8-387.4	372.3-387.4

FLT. HOURS @ =

WAIT HOURS @ =

MAX. WAITS @ =

RON'S @ =

MISC @ =

SUBTOTAL =

FED. TAX 5% 8% =

FLIGHT TOTAL =

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
1	1	7.23	PHL	1250.1	1250.6	0835	0925	.5	.+50	648	IFR			
2	1	"	TEB	1250.6	1251.0	1123	1155	.4	0+32	562				
3	4	723	BTV	1251.4	1251.7	1220	1334	.7	1+14	1371				
4	1	"	TEB	1251.7	1252.5	1338	1425	0.8 ~~0.7~~	0+47	1119				
5	2	"	DAL	1252.5	1255.6	1647	2023	3.1	3+36	3582				
6	1	7.24	BNA	1255.6	1257.1	1045	1225	1.5	1+40	1539				
					TRIP TOTALS			~~6.9~~ 7.6	+					

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.	2474.8	24748	2075	24748	2071	2085
TRIP TIME	~~7.0~~ 6.9	~~7.0~~ 6.9	6	~~7.0~~ 6.9	5	6
TOTAL TIME	2481.8	2481.7	2081	2481.7	2076	2091

AIRCRAFT CHECKED AND FOUND AIRWORTHY. PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature)

NOTES:

9304353343

JUL 29 1986

FLIGHT LOG

MA Nº 09881

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 546-4300

Date 7.21.-7.24.86 ACFT N37984
PIC P. AMSDEN SIC T. RUEHLE
Sched. By: MS Date

AUTHORIZED BY: GARY HUNT CUSTOMER: KARL-LORIMAR
ADDRESS: ON FILE
QUOTE: PHONE:(W) 714.474.0355
(H)

AE BA MC CASH CHECK **CREDIT** **PAID**

ITINERARY: TO TO TO / TO TO TO

PAX:

LEG NO.	1	2	3	4	5	6
TOW	16,900					
MGTOW	18,300					
C.G. LOCATION	384.9					
C.G. LIMITS	376.4-389.4					

(18.5) 18.6	FLT. HOURS @ 119.00	=	2,227.00
6.4	WAIT HOURS @ 50.00	=	320.00
	MAX. WAITS @	=	
3	RON'S @ 495.00	=	1485.00
1 IFF	117.15		117. E
1 CATERING	MISC @ 291.98	=	291.98 E
	SUBTOTAL	=	24,441.13
	FED. TAX 5% 8%	=	1931.93
	FLIGHT TOTAL	=	26,373.06

RONS 495.12
IFF 117.15
FUEL 5081.25
AF 56.37
36.61

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
1	2	7.24	SNA	1257.1	1261.2	2245	0300	4.1	4+15	4412	IFR			
2									+		N 0300 SCHED OUT 1630			
3									+		10.5 < 4.1 >			
4									+		6.4 STBY 3 RONS 18.4 FLT			
5									+					
6								18.5	+					
					TRIP TOTALS			4.1	+					

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.	2481.8 2481.8	2481.8	2081	2481.8	2076	2091
TRIP TIME	4.1	4.1	1	4.1	1	1
TOTAL TIME	2485.9	2485.9	2082	2485.9	2077	2092

AIRCRAFT CHECKED AND FOUND AIRWORTHY, PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED

PIC (Signature)

18.5
NOTES: PAX MADE A MULTITUDE OF PHONE CALLS (APPROX 15-20) — TO NUMBERS UNKNOWN
QM 69009-182

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: K1205
KARL- LORIMAR HOME VIDEO
17942 COWAN
IRVINE, CA. 92714

INVOICE NO. 04110
INVOICE DATE 7/24/86

FLIGHT DATES: 7/21/86 to 7/24/86 INVOICE NO. 04110
ITINERARY : SNA GST MSP ORD PIT DTW TEB PHL TEB BTV TEB DAL BNA SNA

AIRCRAFT : 37984 FLIGHT LOG NUMBER.. 9881
PILOT IN COMMAND.... PHIL AMSDEN
SECOND IN COMMAND... - TERESE RUEHLE

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	18.6	1,195.00	22,227.00	
Wait Hours	6.4	50.00	320.00	
Max Wait				
Trips	3	495.00	1,485.00	
		Total Flight Charge ..		24,032.00
LANDING FEES	1	117.15	117.15	
CATERING	1	291.98	291.98	
		Total Misc. Charges ..		409.13

Comments
AUTHORIZED BY: GARY HUNT
PAX: MR. GARY HUNT +
FLITE CALL CHARGES TO FOLLOW

Sub-Total	24,441.13
Transportation Tax ...	1,931.93
Flight Total	26,373.06

*** TERMS: NET 15 ***

THANK YOU FOR FLYING WITH MARTIN AVIATION, INC. TELEPHONE: (714) 852-8300

104

THURSDAY

Exhibit Fourteen

FALCON 50

BROKERED TO AIRCRAFT

KURT SCHULK 1-800-942-7604

JUL 29 1988

FLIGHT LOG

MA № 10011

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 546-4300

Date: 7-24 / 7-25-86 ACFT: N841F

PIC: SIC:

Sched. By: MIKE SEVERY Date: 7-23-86

AUTHORIZED BY: RAMA CUSTOMER: STUART KARL

ADDRESS: ON-FILE

QUOTE: 38,642.40 15.9 2 RONS PHONE: (W) 714-474-0355

AE BA MC CASH CHECK CREDIT PAID (H)

ITINERARY: PDX TO SNA (0) SNA TO BNA (3) 1200 BNA TO ACK (0)
ACK TO SNA (5) 14/1500 SNA TO PDX (0) TO ( )

PAX:

LEG NO.	1	2	3	4	5	6
TOW						
MGTOW						
C.G. LOCATION						
C.G. LIMITS						

15.9	FLT. HOURS @ 2155.00	=	34,264.50
	WAIT HOURS @	=	
	MAX. WAITS @	=	
2	RON'S @ 750.00	=	1500.00
1 CATERING	120.00		120.00
1 F/F	MISC @ 180.00	=	180.00
	SUBTOTAL	=	36,064.50
	FED. TAX 5% 8%	=	2875.56
	FLIGHT TOTAL	=	38,940.06

CATS 20.00 P.C. # 50936 31470 TO

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
1									+					
2									+					
3									+					
4									+					
5									+					
6									+					
						TRIP TOTALS			+					

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.						
TRIP TIME						
TOTAL TIME						

AIRCRAFT CHECKED AND FOUND AIRWORTHY; PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature)

NOTES: LEG #2 JEFF JENEST
PORT SHARNON TOM HAYMEN
LEG #4 STUART KARL AND
FAMILY — BETH SEE ATTACHED
SHEET FOR COST BREAK DOWN

FEC EX. #14
WITNESS: HUNT
4/12/88
MUR 2583

HA

National 45-604 Eye-Ease 45-704 20/20 Buff Made in USA

COST FOR KARL TRIP

				A.C.A.P.C.	MAI CHG TO STUART KARL
FERRY	PDX-SNA	2.0	1200.00	2400.00	3000.00
	SNA-BNA	3.6	2300.00	8280.00	9000.00
	BNA-ACK	2.1	1500.00	3150.00	3780.00
	ACK-SNA	6.2	2300.00	14,260.00	15,500.00
	SNA-PDX	2.0	1200.00	2400.00	3000.00
		15.9			
2 RON's @ 500 =				1000.00	1500.00
LND FEES 180.00					180.00
SUB TOTAL				31,490.00	35,960.00
TAX @ 8%					2876.80
					38,836.80 — STUART'S PRICE

ACAPC →

(NET NET NO-TAX)

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: K1204
STUART KARL
ATTN: RAMA WHITE
17942 COWAN
IRVINE, CA. 92714

INVOICE NO. 04073
INVOICE DATE 7/25/86

FLIGHT DATES: 7/24/86 to 7/24/86
ITINERARY : PDX SNA BNA ACK SNA PDX

AIRCRAFT : 841F

INVOICE NO. 04073

FLIGHT LOG NUMBER.. 10011

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	15.9	2,155.00	34,264.50	
Wait Hours				
Wait				
Runs	2	750.00	1,500.00	
		Total Flight Charge ..		35,764.50
CATERING	1	120.00	120.00	
LANDING FEES	1	180.00	180.00	
		Total Misc. Charges ..		300.00

Comments
AUTHORIZED BY: RAMA
PAX: JEFF JENEST,
CORT SHARNON, TOM HAYDEN,
STUART KARL & FAMILY

Sub-Total	36,064.50
Transportation Tax ...	2,875.56
Flight Total	38,940.06

*** TERMS: NET 15 ***

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

7.9.86

Janice:
I guess by what
CJM did we need
to w/o .04 on Stuart's
Acct.

: K1204
STUART KARL
ATTN: RAMA WHITE
17942 COWAN
IRVINE, CA. 92714

INVOICE NO. 04073
INVOICE DATE 7/25/86

LIGHT DATES: 7/24/86 to 7/24/86
TINERARY : PDX SNA BNA ACK SNA PDX

INVOICE NO. 04073

IRCRAFT : 841F

FLIGHT LOG NUMBER.. 10011

Description Of Charge	Units	Rate	Extension	Totals
light Hours	15.9	2,155.00	34,264.50	
Hours				
Wait				
ons	2	750.00	1,500.00	
		Total Flight Charge ..		35,764.50
ATERING	1	120.00	120.00	
ANDING FEES	1	180.00	180.00	
		Total Misc. Charges ..		300.00
		Sub-Total		36,064.50
		Transportation Tax ...		2,873.56
		Flight Total		38,940.06

mments
THORIZED BY: RAMA
X: JEFF JENEST,
RT SHARNON, TOM HAYDEN,
UART KARL & FAMILY

*** TERMS: NET 15 ***

MartinAviation, Inc.

Please remit to:
Post Office Box 4511
Irvine, CA 92716-4511
Attention: Accounting

Invoice G 04663

White copy — Customer
Yellow copy — Accounting
Pink copy — Billing Office

Sold To STUART KARL ATTENTION DANA WHITE Customer's Order No. _____ Date AUGUST 20 19 86

Address 17942 COWAN Cash _____ Charge _____

City & State IRVINE, CALIFORNIA 92714 Terms _____

Date	Description		Net
07/28/86	/FALCON 50B N841F ACK SNA		
CHARGES:	0.2 Hours @ $2,500/HR	$15,500.00	
	CATERER 120.00	120.00	
	LANDING FEES 180.00	180.00	
	TAX 1,254.40	1,254.00	
	TOTAL		$17,054.40
Received By			

4225 Donald Douglas Drive, Long Beach, California 90808 (213) 420-3500

MartinAviation, Inc.

Please remit to:
Post Office Box 4511
Irvine, CA 92716-4511
Attention: Accounting

Invoice G 04689

White copy — Customer
Yellow copy — Accounting
Pink copy — Billing Office

Sold To KARL LOEHR — Customer's Order No. _____ Date AUGUST 29 1996

Address 17042 CONAN — Cash _____ Charge _____

City & State IRVINE, CALIFORNIA 92714 — Terms _____

Date	Description		Net
07/24/96	FALCON 50 N941F "CHARTER FLIGHT"		
	PDX-SNA-BNA-ACK-SNA		
	CHARGES: 9.7 HOURS @ $1031.44/HR	$10,764.46	
	2 RON @ 750.00/Per	1 500.00	
	TAX	1 621.16	
	TOTAL		$21,885.62

Received By

4225 Donald Douglas Drive, Long Beach, California 90808 (213) 420-3500

179 — Oct Wed-Fri — Lear 35 — Exhibit Fifteen

FLIGHT LOG

MA № 3382

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 852-8300

Date: 10/5-10 ACFT: 37987
PIC: K Gibson SIC: C O'dell
Sched. By: BF Date: 10/6

AUTHORIZED BY: Mike S. CUSTOMER: Stuart Karl
ADDRESS:
QUOTE: PHONE: (W) 474-0355 (H)

AE BA MC CASH CHECK CREDIT PAID

ITINERARY:
SNA to MSP (4) 1500 — MSP to OMA (5) 1330 — OMA to DCA (5) 1930
DCA to JLN (5) 1900 — JLN to LAX (1) — LAX to SNA (1)

PAX:

LEG NO.	1	2	3	4	5	6
TOW	16475	13155	15125	17440	12975	13197
MATOW	18300	16535	18300	18300	18300	15676
C.G. LOCATION	360.9	371.7	365.7	362.3	371.0	377.4
C.G. LIMITS	345.2-367.0	371.6-377.0	374.5-367.0	346.5-367.0	374.3-367.0	342-367.0

FLT. HOURS @ 1195.00 = 14698.50
WAIT HOURS @ 50.00 = 160.00
MAX. WAITS @ =
RON'S @ 495.00 = 990.00
MISC @ 10.00 = 50.00
SUBTOTAL = 16446.91
FED. TAX 5% 8% = 1271.88
FLIGHT TOTAL =

LEG NO.	PAX	DATE	AIRPORT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK OUT	BLOCK IN	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
1	4	10/8	SNA	1439.9	1442.2	1550	1900	3.2	3+10	3755	IFR			
2	5	10/9	OMA	1442.2	1442.3	1045	1135	.6	0+50	853				
3	5	10/9	DCA	1442.8	1444.9	1650	1900	2.1	2+10	2344				
4	5	10/10	PDX	1444.9	1448.3	1625	1915	3.4	3+50	3395				
5	5	10/10	LAX	1448.3	1450.3	2055	2305	2.0	2+10	2320				
6	3	10/10	SNA	1450.3	1451.6	2330	2355	.3	0+25	421				
							TRIP TOTALS	11.6	12+35	13463				

FLT TIME	AIRFRAME	ENG NO. 1	CYCLES	ENG NO. 2	CYCLES	LDGS
TIME FWD.	2662.7	2662.9	2714	2662.7	2204	2228
TRIP TIME	11.6	11.6	6	11.6	6	6
TOTAL TIME	2674.3	2674.3	2220	2674.3	2210	2234

AIRCRAFT CHECKED AND FOUND AIRWORTHY PRE FLIGHT, ROUTE AND FLI GHT PLANNING COMPLETED.
PIC (Signature)

NOTES: SNA MSP - Cater Deluxe Sandwich, Fruit — Cookie, Beer - Bed Light - Coors
MSP - OMA - Cheese/Crackers
OMA - DCA - deluxe sandwich
DCA - Deluxe Sandwich Chex | Pretzels

pay Quote of 12.3
Bill to KL 006
pillow - blankets

FEC #15 W. HUNT MUR 25883 4/12/88 (TA)

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: K1205
KARL- LORIMAR HOME VIDEO
ATTN: MIKE SEVERY
17242 COWAN
IRVINE, CA. 92714

INVOICE NO. 05162
INVOICE DATE 10/10/86

FLIGHT DATES: 10/08/86 to 10/10/86
ITINERARY : SNA MSP DHA DCA PUB LAX SNA

INVOICE NO. 05162

AIRCRAFT : 37984
PILOT IN COMMAND.... KEN GIBSON
SECOND IN COMMAND... GARY ODELL

FLIGHT LOG NUMBER.. 3302

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	12.3	1,195.00	14,698.50	
Wait Hours	3.2	50.00	160.00	
Max Wait				
Rons	2	495.00	990.00	
		Total Flight Charge ..		15,848.50
CATERING	1	416.98	416.98	
LANDING FEES	5	10.00	50.00	
		Total Misc. Charges ..		466.98
		Sub-Total		16,315.48
		Transportation Tax ...		1,271.88
		Flight Total		17,587.36

Comments
KL-606
ONLY CHARGED FOR HALF OF THE CATERING FROM DCA

*** TERMS: NET 15 ***

Fri_Sat Lear 4 3 5 3 3 Exhibit Sixteen

12

Date: 11/21-22 ACFT: 37954
PIC: KWAIT SIC: GODELL
Sched. By: BF Date: 11/20

FLIGHT LOG

10.5 3.2 IRON

K120 MA № 3723

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 852-8300

07

AUTHORIZED BY: MS CUSTOMER: S. KARL
ADDRESS:
QUOTE: PHONE: (W)
(H)

AE BA MC CASH CHECK (CREDIT) PAID

ITINERARY: 11/21 SLA TO OCA (1) 1300 | OCA 11/22 TO DEN (4) 0700 DEN TO SNA (4) -
TO TO TO

PAX: MIKE SEVERY

LEG NO.	1	2	3	4	5	6
TOW	16885	16555	15360			
MATOW	18300	18300	16967			
C.G. LOCATION	385.2	380.8	378.6			
C.G. LIMITS	375.8-387.0	375.8-387.0	375.9-387.0			

10.5
(10.4) FLT. HOURS @ 1195.00 = 12547.50
3.2 WAIT HOURS @ 50.00 = 160.00
MAX. WAITS @ =
1 RON'S @ 495.00 = 495.00
1 CATERING 419.84 = 419.84
3'/F MISC @ 10.00 = 30.00
BOOZE=304.36
RON=160.00
CAT=37.54
65.94
FUEL=1849.50
SUBTOTAL = 13652.34
FED. TAX 5% 8% = 1058.60
FLIGHT TOTAL = 14710.94

LEG NO.	PAX	DATE	AIRPORT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK OUT	BLOCK IN	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
1	1	11/21	OCA	1508.4	1512.8	1300	1750	4.4	4+50	5050				
2	4	11/22	ENL	1512.8	1516.5	0535	0930	3.7	3+55	4400				
3	1	11/22	FMN	1516.5	1517.4	1054	1157	.9	1+03	1300				
4	1	11/22	SNA	1517.4	1518.8	1300	1435	1.4	1+35	1600				
5									+		7200 1600 5400			
6									+					
							TRIP TOTALS	10.4	11+23					

FLT TIME	AIRFRAME	ENG NO. 1	CYCLES	ENG NO. 2	CYCLES	LDGS
TIME FWD.	2732.1	2732.1	2265	2732.1	2254	2278
TRIP TIME	10.4	10.4	4	10.4	4	4
TOTAL TIME	2742.5	2742.5	2269	2742.5	2258	2282

AIRCRAFT CHECKED AND FOUND AIRWORTHY. PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature) Daniel

NOTES: KL 0015
DP - Corona - (Sandwich)
Dank-SLA - Sandwich Trey
Fruit Fruit Dessert
Catering DCA DEN

FEC Ex. 16 w/ HUNT MUR 2583 4/12/88

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: K1295
KABC - LORIMAR HOME VIDEO
ATTN: MIKE SEVERY
23942 COMMON
IRVINE, CA. 92714

INVOICE NO. 05687
INVOICE DATE 11/23/86

FLIGHT DATES: 11/21/86 to 11/22/86
ITINERARY : SNA OCA FML FMD SNA

INVOICE NO. 05687

AIRCRAFT : 37984
PILOT IN COMMAND.... KEVIN HAYT
SECOND IN COMMAND... GARY ODELL

FLIGHT LOG NUMBER.. 3723

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	10.5	1,195.00	12,547.50	
Wait Hours	3.2	50.00	160.00	
Max Wait				
Mons	1	495.00	495.00	
		Total Flight Charge ..		13,202.50
CATERING	1	419.84	419.84	
LANDING FEE	3	10.00	30.00	
		Total Misc. Charges ..		449.84
		Sub-Total		13,652.34
		Transportation Tax ...		1,058.60
		Flight Total		14,710.94

Comments
PAX: MIKE SEVERY
KL 0015

*** TERMS: NET 15 ***

MJC-1449 Exhibit Seventeen

117

FLIGHT LOG

K1205 MA № 3717

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 852-8300

Date: 11/24-25/84 ACFT 37984
PIC P.AMSDEN SIC K.GIBSON
Sched. By: Date: 11/20

AUTHORIZED BY: MS CUSTOMER: Stuart Karl
ADDRESS: 02 F:6
QUOTE: PHONE:(W) —

AE BA MC CASH CHECK CREDIT PAID

ITINERARY: SNA TO DEN (4) 1100 DEN TO TEB (5) 1/2 3/0 TEB TO ORD (1) Rain AM
ORD TO SNA (2) 1gt OJ TO TO

PAX:

LEG NO	1	2	3	4	5	6
TOW	15,500	17,800	14,900	16,900	16,700	
MATOW	17,800	17,500	17,500	18,300	17,900	
C.G. LOCATION	21.6 /.	20.3 /.	25.4 /.	25 /.	24.3 /.	
C.G. LIMITS	14 /. - 30 /.	16.8 /. - 30 /.	13 /. - 30 /.	16.5 /. - 30 /.	15.2 /. - 30 /.	

11.6
(11.3) 5.3
FLT. HOURS @ 1195.00 = 13862.00
WAIT HOURS @ 50.00 = 265.00
MAX. WAITS @ — = —
1 RON'S @ 495.00 = 495.00
1 CATERING 289.81 = 289.81
1 LIF 62.63 = 63
1 LIMO MISC @ 75.10 = .10
SUBTOTAL = 15055.54
FED. TAX 5% 8% = 1175.25
FLIGHT TOTAL = 16230.79

LIF = 68.43
FOD = 160.00
CAT = 35.91 31.71
LIMO = 12.00 31.71
45.10

LEG NO	PAX	DATE	AIRPORT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK OUT	BLOCK IN	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
1	4	11.24	DEN	1518 8	1520 7	1119	1330	1 9	2 + 11	2235	IFR			
2	5	"	TEB	1520 7	1523 9	1710	2030	3 2	3 + 20	3115				
3	2	11.25	ORD	1523 9	1525 5	0914	1144	1 9	2 + 30	1849	EST			
4	"	"	MPA	1525 8	1528 1	1509	1740	2 3	2 + 31	1953	EST			
5	2	11/25	SNA	1528 1	1530.1	1825	2035	2 9	2+10	1524	EST			
6									+					
							TRIP TOTALS	11 3	12+45					

NOTE: ~~NO~~ EOC CATERING IN IL

FLT TIME	AIRFRAME	ENG NO. 1	CYCLES	ENG NO. 2	CYCLES	LDGS
TIME FWD.	2742 5	2742 5	2269	2742 5	2258	2282
TRIP TIME	11 3	11 3	5	11 3	5	5
TOTAL TIME	2753 8	2753 8	2274	2753 8	2263	2287

AIRCRAFT CHECKED AND FOUND AIRWORTHY. PRE FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED

PIC (Signature)

NOTES: KL-0014
DEN- CUMBI Gate
TEB- Atlanti
Cater SNA-DEN deluxe Sandwich Fr-6
MILK 3 PLATES six pac Corona 1 qt OJ
ASPIRIN DEN-TEB-Sandwich Tray
Dck-5

FEC # 17
W/ HUNT
MJR 2583
4/12/88
HA

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: K1205
KARL- LORIMAR HOME VIDEO
ATTN: MIKE SEVERY
17942 COMAN
IRVINE, CA. 92714

INVOICE NO. 05883
INVOICE DATE 11/25/86

FLIGHT DATES: 11/24/86 to 11/25/86
ITINERARY : SNA DEN TEB ORD APA SNA

INVOICE NO. 05883

AIRCRAFT : 37984
PILOT IN COMMAND.... PHIL AMSDEN
SECOND IN COMMAND... KEN GIBSON

FLIGHT LOG NUMBER.. 3717

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	11.6	1,195.00	13,862.00	
Wait Hours	5.3	50.00	265.00	
Max Wait				
Mons	1	495.00	495.00	
		Total Flight Charge ..		14,622.00
CATERING	1	289.81	289.81	
LANDING FEE	1	68.63	68.63	
LIMO	1	75.10	75.10	
		Total Misc. Charges ..		433.54
		Sub-Total		15,055.54
		Transportation Tax ...		1,175.25
		Flight Total		16,230.79

Comments
KL 0014
NOTE: N/C FOR CATERING IN ILLINOIS

*** TERMS: NET 15 ***

MIW DRUNKEN ... EXECUTIVE AIR FLEET ...

123

Date: 11/1 ACFT: 711JT

PIC: SIC

Sched. By: Date:

FLIGHT LOG

K1204 MA Nº 3780 EXHIBIT EIGHTEEN

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 852-8300

05

AUTHORIZED BY: M. Seng CUSTOMER: S. Karl STUART KARL

ADDRESS:

QUOTE: PHONE: (W) 800-

AE BA MC CASH CHECK CREDIT PAID (H)

TEB-DCA-TEB

ITINERARY: TEB TO DCA (L) 1700 drop TO TO TO TO TO TO

PAX: M. Emrys.n

LEG NO.	1	2	3	4	5	6
TOW						
MATOW						
C.G. LOCATION						
C.G. LIMITS						

2.0	FLT. HOURS @ 1,535.00	= 3070.00
	WAIT HOURS @	=
	MAX. WAITS @	=
	RON'S @	=
1 4/F	MISC @ 100.00 ~~100.00~~	= 100.00 5
	SUBTOTAL	= 3170.00
	FED. TAX 5% 8%	= 253.60
	FLIGHT TOTAL	= 3423.60

P.O. 74926 2570.00

LEG NO.	PAX	DATE	AIRPORT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK OUT	BLOCK IN	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
1									+					
2									+					
3									+					
4									+					
5									+					
6									+					
							TRIP TOTALS		+					

FLT TIME	AIRFRAME	ENG NO. 1	CYCLES	ENG NO. 2	CYCLES	LDGS
TIME FWD.						
TRIP TIME						
TOTAL TIME						

AIRCRAFT CHECKED AND FOUND AIRWORTHY. PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature)

NOTES: Call Martin 2570 net-net
add 500
3070
@ 45.60 tax
$ 3315.60

4/12/88 FEC EX. W/ HUNT MUR 2583 #18 (HA)

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: K1204
STUART KARL
ATTN: MIKE SEVERY
17242 COWAN
IRVINE, CA. 92714

INVOICE NO. 06207
INVOICE DATE 12/08/86

FLIGHT DATES: 0/00/00 to 0/00/00 INVOICE NO. 06207
ITINERARY : TEB DCA TEB

AIRCRAFT : 711JT FLIGHT LOG NUMBER.. 3780

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	2.0	1,535.00	3,070.00	
Wait Hours				
Tax Wait				
Mons				
		Total Flight Charge ..		3,070.00
LANDING FEE	1	100.00	100.00	
		Total Misc. Charges ..		100.00

Comments
AUTHORIZED BY: MIKE SEVERY
PAX: MR. EMERSON

Sub-Total	3,170.00
Transportation Tax ...	253.60
Flight Total	3,423.60

*** TERMS: NET 15 ***

Exhibit Nineteen

122

FLIGHT LOG

Date: 12.05.86 ACFT: 2 58RW 4353 3 3 5 0

PIC: P. AMSDEN SIC: D CALLAHAN

Sched By: Date:

K1205 MA Nº 2826

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 852-8300

AUTHORIZED BY: GARY HUNT CUSTOMER: KARL COLEMAN

ADDRESS:

QUOTE: PHONE: (W) (H)

AE BA MC CASH CHECK (CREDIT) PAID

ITINERARY: SNA TO SJC (4) 1100 SJC TO SNA (5) 1500 TO

TO TO TO

PAX:

LEG NO	1	2	3	4	5	6
TOW	15,000	13,800	12,500			
MATOW	15,600	15,300	14,500			
C.G. LOCATION	377.4	374.6	375.3			
C.G. LIMITS	373.4-357.0	371.6-387.0	369.7-387.0			

2.3	FLT. HOURS @ 1195.00	=	2748.50
5.1	WAIT HOURS @ 50.00	=	255.00
	MAX. WAITS @	=	
	RON'S @	=	
1 CATERING	54.69		54.69
2 2/F	MISC @ 10.00	=	20.00
	SUBTOTAL	=	3078.19
	FED. TAX 5% 8%	=	241.88
	FLIGHT TOTAL	=	3320.07

-54.69

LEG NO	PAX	DATE	AIRPORT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK OUT	BLOCK IN	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
			SNA											
1	3	12.05	SJC	710 2	711 3	1134	1255	1 1	1+21	1386	IFR			
2	5	"	SNA	711 3	712.1	1629	1729	ϕ 8	1+00	1084	"			
3	3	"	SNA	712 1	712 5	1740	1821	ϕ 4	ϕ+41	542				
4									+					
5									+					
6									+					
					TRIP TOTALS			2 3	+					

	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
FLT TIME						
TIME FWD.	3570 2	3549 4	2098	3176 7	2525	2414
TRIP TIME	2 3	2 3	3	2 3	3	3.
TOTAL TIME	3572 5	3551 7	2101	3179 ϕ	2528	2417

AIRCRAFT CHECKED AND FOUND AIRWORTHY. PRE FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED

PIC (Signature)

NOTES: IN 1821
(Started) OUT 1100
7.4
<2.3>
5.1 STBY
2.3 FLT

W. HUNT 4/12/88

MUR 2583 FEC Ex. #19

HH

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: F1205
KARL LORIMAR HOME VIDEO
ATTN: MIKE SEVERY
17242 COMAN
IRVINE, CA. 92714

INVOICE NO. 06017
INVOICE DATE 12/05/86

FLIGHT DATES: 12/05/86 to 12/05/86
ITINERARY : SNA SJC LAX SNA

INVOICE NO. 06017

AIRCRAFT : 58KW
PILOT IN COMMAND.... PHIL AMSDEN
SECOND IN COMMAND... DAVE CALLAHAN

FLIGHT LOG NUMBER.. 2826

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	2.3	1,195.00	2,748.50	
Wait Hours	5.1	50.00	255.00	
Max Wait				
Runs				
		Total Flight Charge ..		3,003.50
CATERING	1	54.69	54.69	
LANDING FEE	2	10.00	20.00	
		Total Misc. Charges ..		74.69
		Sub-Total		3,078.19
		Transportation Tax ...		241.88
		Flight Total		3,320.07

Comments
AUTHORIZED BY GARY HART

*** TERMS: NET 15 ***

124 12/12 13 Exhibit Twenty

FLIGHT LOG

K1204MA No. 3979

11.2 5.3 2 CON

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 852-8300

07

Date: 12/10/86 ACFT: 58 RW
PIC: K Gibson SIC: Goiell
Sched. Eq. GEH Date: 12/9/86

AUTHORIZED BY: CUSTOMER: Stuart Karl
ADDRESS: on file
QUOTE: PHONE: (W) 474-0355
(H)

AE BA MC CASH CHECK **CREDIT** **PAID**

ITINERARY: SNA TO BNA (2) 1700 BNA TO ORD (2) ORD TO TEB (2)
TEB TO SNA (2) TO ( ) TO ( )

PAX: 2 PAX

LEG NO	1	2	3	4	5	6
TOW	14688	14450	15520	14900	15293	
MATOW	12350	15722	15568	17213	17511	
C.G. LOCATION	371.3	370.1	372.1	371.0	371.3	
C.G. LIMITS	369.7-376.0	369.4-387.0	373.1-387.0	373.0-387.0	373.6-387.0	

(11.0) FLT. HOURS @ 1195.00 = 13384.00
5.3 WAIT HOURS @ 50.00 = 265.00
MAX. WAITS @ =
2 RON'S @ 495.00 = 990.00
4 L/F 10.00 = 40.00
1 CATER MISC @ 385.06 = 385.06
SUBTOTAL = 15064.06
FED. TAX 5% 8% = 1174.32
FLIGHT TOTAL = 16238.38

L/F = 30.00, 15.00, 29.70, 67.50, 10.00, 10.00
CATS = 121.00, 130.00
EON = 130.00

LEG NO	PAX	DATE	AIRPORT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK OUT	BLOCK IN	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
1	2	12/10	SNA	734.0	737.3	1705	2055	3.7	3+50	4059	ITR			
2	2	12/11	BNA	737.3	738.4	1120	1235	1.1	1+15	1422				
3	3	12/12	PIT	738.4	739.4	0910	1015	1.0	1+05	1268				
4	2	12/12	SNA	739.4	741.9	1420	1715	2.5	2+55	3042				
5	2	12/12	SNA	741.9	744.6	1748	2042	2.7	2+54	2981				
6									+					
						TRIP TOTALS		11.0	11+59	12802				

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD	3590.6	3569.8	2108	3197.1	2585	2424
TRIP TIME	11.0	11.0	5	11.0	5	5
TOTAL TIME	3601.6	3580.8	2113	3208.1	2590	2429

AIRCRAFT CHECKED AND FOUND AIRWORTHY. PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED

Ken Gibson
PIC (Signature)

NOTES Fruit ~~Cheese~~ Sandwich Tray,

Pull 2 seats

+ 2 Bottles DP

FEC Ex. # 20
W. HUNT
4/12/88
MUR 2583

(HH)

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

D: K1204
STUART KARL
ATTN: MIKE SEVERY
17942 COMAN
IRVINE, CA. 92714

INVOICE NO. 06126
INVOICE DATE 12/12/86

FLIGHT DATES: 12/10/86 to 12/13/86
ITINERARY : SNA PWK DNA PIT SLN SNA

INVOICE NO. 06126

AIRCRAFT : 58RW
PILOT IN COMMAND.... KEN GIBSON
SECOND IN COMMAND... GARY ODELL

FLIGHT LOG NUMBER.. 3979

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	11.2	1,195.00	13,384.00	
Wait Hours	5.3	50.00	265.00	
Wait				
Cons	2	495.00	990.00	
		Total Flight Charge ..		14,639.00
LANDING FEE	4	10.00	40.00	
CATERING	1	385.06	385.06	
		Total Misc. Charges ..		425.06
		Sub-Total		15,064.06
		Transportation Tax ...		1,174.32
		Flight Total		16,238.38

mments
AX: 2

*** TERMS: NET 15 ***

106 Fr-Sat Lear-35 4 3 Exhibit Twenty-One

FLIGHT LOG

MA Nº 2127

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 852-8300

Date: 1/9-10/87 ACFT: 31984 (K1205)
PIC: P. Amsden SIC: ~~G.~~ Ron Watson
Sched. By: BF Date: 12/23

AUTHORIZED BY: MS. CUSTOMER: S. Kal
ADDRESS:
QUOTE: PHONE: (W)

AE BA MC CASH CHECK CREDIT PAID (H)

ITINERARY: SNA to LAS 0900 LAS to SNA 1120
TO TO TO
TO TO TO

Mr+Mrs
PAX: Stuart Kal + ~~Carolyn~~ + ~~Scott~~ Dean Bender

LEG NO.	1	2	3	4	5	6
TOW	14,772	13,857				
MATOW	16,400	16,400				
C.G. LOCATION	377.2	375.5				
C.G. LIMITS	373.4 - 387.4	371.7 - 387.4				

(1.3) FLT. HOURS 1.4 @ 1195 = 1673.00
7.9 WAIT HOURS @ 50 = 395.00
MAX. WAITS @ = =
1 RON'S @ 495 = 495.00
1 MISC @ LF = 10.00
SUBTOTAL = 2573.00
FED. TAX 5% 8% = 205.84
FLIGHT TOTAL = 2903.72

1675 - FOB
-1220 - LAS
455 - SNA

LEG NO.	PAX	DATE	AIRPORT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK OUT	BLOCK IN	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED
1	5	01.09	LAS	1645 9	1646 6	1015	1113	ø 7	ø+58	1100
2	6	01.10	SNA	1646 6	1647 2	1645	1730	ø 6	ø+45	1200
3									+	
4									+	
5									+	
6									+	
							TRIP TOTALS	1 3	+	

ROUTE	ALT	ETE	FOB
First 1730 IN 0900 SNA OUT			
" 8.5			
ø.6			
7.9 STAT			
1.3 FLT			
1 RON			

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LOGS
TIME FWD.	2869 9	2869 9	2357	2869 9	2342	2371
TRIP TIME	1 3	1 3	2	1 3	2	2
TOTAL TIME	2871 2	2871 2	2359	2871 2	2344	2373

AIRCRAFT CHECKED AND FOUND AIRWORTHY. PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature)

NOTES: Bill KL-023
~~ST~~ RQL
Fuel Drain 6pts at 1hr service

FEC Ex. #21
W. HUNT
MUR 2583
4/2/88

THANK YOU FOR FLYING WITH MARTIN AVIATION, INC. TELEPHONE: (714) 8[illegible]

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: #1205
KARL - LORIMAR HOME VIDEO
ATTN: MIKE SEVERY
17942 COWAN
IRVINE, CA. 92714

INVOICE NO. 06531
INVOICE DATE 1/10/87

FLIGHT DATES: 1/09/87 to 1/10/87
ITINERARY : SNA LAS SNA

INVOICE NO. 06531

AIRCRAFT : 37984
PILOT IN COMMAND.... PHIL AMSDEN
SECOND IN COMMAND... RON WATSON

FLIGHT LOG NUMBER.. 2127

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	1.4	1,195.00	1,673.00	
Wait Hours	7.9	50.00	395.00	
Max Wait	.			
Mons	1	495.00	495.00	
		Total Flight Charge ..		2,563.00
CATERING	1	124.00	124.00	
LANDING FEE	1	10.00	10.00	
		Total Misc. Charges ..		134.00
		Sub-Total		2,697.00
		Transportation Tax ...		205.84
		Flight Total		2,903.72

Comments
KL 025
PAX: MR.& MRS. STUART KARL
+ DEAN BENDER

*** TERMS: NET 15 ***

LLO MKN MDW LEXR 9304 Exhibit 23 Twenty-Two

FLIGHT LOG

11.9 / 4.8 / 1 RON

K1205 MA № 1556

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 852-8300

C7

Date: 01.26-27.87 ACFT: 58RW

PIC: P.A. MSDEN SIC: GO'DALE

Sched. By: BF Date: 1/14

AUTHORIZED BY: MS CUSTOMER: S. Karl Karl Lorimar

ADDRESS:

QUOTE: PHONE: (W)

(H)

AE BA MC CASH CHECK **CREDIT** **PAID**

ITINERARY: SNA TO ~~DEAL~~ SLC 3 ~~2~~ 700 ~~SLC~~ ~~DEN~~ TO ~~TEB~~ ~~2~~ Z

RIC TO CHO

CHO TO TEB TEB TO TO

PAX: Stuart Karl/Stu Rivers (+1 DEN)

LEG NO.	1	2	3	4	5	6
TOW	15,500	16,600	15,500	16,600		
MATOW	16,300	18,300	17,000	18,300		
C.G. LOCATION	377.7	383.3	378.3	382.7		
C.G. LIMITS	374.4 - 387.4	375.4 - 387.4	374.4 - 387.4	375.4 - 387.4		

11.9	FLT. HOURS @ 1195.00	=	14220.50
4.8	WAIT HOURS @ 50.00	=	240.00
	MAX. WAITS @	=	
1	RON'S @ 495.00	=	495.00
1 CAT F/F	MISC @ 145.50	=	145.50
	SUBTOTAL	=	15159.00
	FED. TAX 5% 8%	=	1201.08
	FLIGHT TOTAL	=	16360.08

LEG NO.	PAX	DATE	AIRPORT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK OUT	BLOCK IN	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
1	3	01.26	SLC	826.1	827.6	0726	0912	1.5	1+46	1915	IFR			
2	2	"	TEB	827.6	831.7	0940	1400	4.1	4+20	4175	11.9 FLT			
3	"	01.27	SLN	831.7	834.7	1030	1404	3.0	3+34	3399	1 RON			
4	"	"	SNA	834.7	838.0	1437	1801	3.3	3+24	3727	4.7 STBY			
5									+					
6									+					
						TRIP TOTALS		11.9 ✓	+					

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.	3686.1	3665.3	2174	3292.6	2601	2492
TRIP TIME	11.9	11.9	4	11.9	4	4
TOTAL TIME	3698.0	3677.2	2178	3304.5	2605	2496

AIRCRAFT CHECKED AND FOUND AIRWORTHY. PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED

PIC (Signature)

NOTES: Delux Sandwich Tray/Fruit Basket - By Vicki. Compliments OP

4/2/88

FEC EX. # 22 W/ HUNT (HH)

THANK YOU FOR FLYING WITH MARTIN AVIATION, INC.

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TELEPHONE: (714) [illegible]

TO: #1205
KARL - LORIMAR HOME VIDEO
ATTN: MIKE SEVERY
17942 COWAN
IRVINE, CA. 92714

INVOICE NO. 06809
INVOICE DATE 1/27/87

FLIGHT DATES: 1/26/87 to 1/27/87
ITINERARY : SNA SLC TEB SLN SNA

INVOICE NO. 06809

AIRCRAFT : 58RW
PILOT IN COMMAND.... PHIL AMSDEN
SECOND IN COMMAND... GARY ODELL

FLIGHT LOG NUMBER.. 1556

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	11.9	1,195.00	14,220.50	
Wait Hours	4.8	50.00	240.00	
Max Wait				
Mons	1	495.00	495.00	
		Total Flight Charge ..		14,955.50
LANDING FEE	1	58.00	58.00	
CATERING	1	145.50	145.50	
		Total Misc. Charges ..		203.50
		Sub-Total		15,159.00
		Transportation Tax ...		1,201.08
		Flight Total		16,360.08

Comments
PAX: STUART KARL, STEVE RIVER
+ 1 DEN

*** TERMS: NET 15 ***

Exhibit Twenty-Three

FLIGHT LOG

K1205MA No. 2155

Marina Aviation Charter
1933 Airport Way South
Santa Ana, California 92707
(714) 852-8300

Date: 02.10.87 ACFT: 37984

PIC: P. Amsden SIC: G. O'Dell

Sched. By: BF Date:

AUTHORIZED BY: MS CUSTOMER: KARL-LORIMAR

ADDRESS:

QUOTE: PHONE: (W)

(H)

AE BA MC CASH CHECK **CREDIT** **PAID**

ITINERARY: SNA to SLC (1) 0800 SLC to TEB (2) 1100 TEB to SLN? (2) 02/11

SLN to SNA (2) to to

PAX: SK → SLC / SK, GH → TEB → SNA

LEG NO.	1	2	3	4	5	6
TOW	14,900	17,300	16,500	17,300		
MATOW	17,200	18,300	18,300	18,300		
C.G. LOCATION	380.9	383.4	382.6	383.6		
C.G. LIMITS	373.2 - 387.0	376.4 - 387.0	375.3 - 387.0	376.4 - 387.0		

11.6
(11.1) FLT. HOURS @ 195.00 = 13662.00
6.1 WAIT HOURS @ 50.00 = 305.00
MAX. WAITS @ =
1 RON'S @ 425.00 = 495.00
1 CATERING 226.25 = 226.25
MISC @ 58.00 = 58.00
SUBTOTAL = 14992.25
FED. TAX 5% 8% = 1177.60
FLIGHT TOTAL = 16123.85

LEG NO.	PAX	DATE	AIRPORT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK OUT	BLOCK IN	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
1	3	02.11	SNA	1726.7	1728.1	0826	1000	1.4	1+34	1900	(358) ZFR			
2	4	"	TEB	1728.1	1731.8	1027	1420	3.7	3+53	4200	(2532)			
3	"	02.12	SLN	1731.8	1735.0	1255	1626	3.2	3+31	3900	(2751)			
4	"	"	SNA	1735.0	1738.8	1705	2006	2.8	3+01	3500				
5									+					
6									+					
					TRIP TOTALS			11.1	+					

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.	2950.7	2950.7	2400	2950.7	2386	2517
TRIP TIME	11.1	11.1	4	11.1	4	4
TOTAL TIME	2961.8	2961.8	2404	2961.8	2390	2521

AIRCRAFT CHECKED AND FOUND AIRWORTHY. PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED

PIC (Signature)

NOTES: PAY 11.6 FLT - QUOTE
1 RON
6.1 STBY

FEC EX. #23
W. HUNT
MUR 2583
4/12/88

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: K1205
KARL - LORIMAR HOME VIDEO
ATTN: MIKE SEVERY
17942 COWAN
IRVINE, CA. 92714

INVOICE NO. 07015
INVOICE DATE 2/12/87

FLIGHT DATES: 2/11/87 to 2/12/87
ITINERARY : SNA SLC TEB SLN SNA

INVOICE NO. 07015

AIRCRAFT : 37984
PILOT IN COMMAND.... PHIL AMSDEN
SECOND IN COMMAND... GARY ODELL

FLIGHT LOG NUMBER.. 2155

Description Of Charge	Units	Rate.	Extension	Totals
Flight Hours	11.6	1,195.00	13,862.00	
Wait Hours	6.1	50.00	305.00	
Max Wait				
Rons	1	495.00	495.00	
		Total Flight Charge ..		14,662.00
CATERING	1	226.25	226.25	
LANDING FEE	1	58.00	58.00	
		Total Misc. Charges ..		284.25
		Sub-Total		14,946.25
		Transportation Tax ...		1,177.60
		Flight Total		16,123.85

Comments
AUTHORIZED BY: MIKE SEVERY

*** TERMS: NET 15 ***

112 Wed 9304355 Exhibit Twenty-four

Date: 2/18/87 ACFT: 58RW
PIC: P.Amsden SIC: G.O'Dell
Sched. By: BF Date: 2/17

FLIGHT LOG

K1205 MA Nº 2346

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 852-8300

07

AUTHORIZED BY: MJ CUSTOMER: S. Karl KL-0050

ADDRESS:

QUOTE: PHONE: (W)

AE BA MC CASH CHECK CREDIT PAID (H)

ITINERARY: SNA TO DFW (3) 0600 DFW TO SNA (3) 1600 TO TO

TO TO TO TO

PAX: STUART KARL, DOUG ROSEN, GINO THNASQUEN

LEG NO.	1	2	3	4	5	6
TOW	15,400	14,700				
MATOW	16,600	16,800				
C.G. LOCATION	377.6	377.2				
C.G. LIMITS	374.4 - 387.4	374.4 - 387.4				

4.4	FLT. HOURS @ 1195.00	=	5258.00
6.8	WAIT HOURS @ 50.00	=	340.00
	MAX. WAITS @	=	
1 T/F	RON'S @ 10.00	=	10.00
1 CATERING	MISC @ 302.38	=	302.38
	SUBTOTAL	=	5710.38
	FED. TAX 5% 8%	=	472.83
	FLIGHT TOTAL	=	6383.21

LEG NO.	PAX	DATE	AIRPORT	HOBBS		BLOCK		TOTAL TIME		FUEL USED
			SNA	TAKEOFF	LANDING	OUT	IN	HOBBS	BLOCK	
1	3	2.18	DEN	881 6	883 9	0620	0845	2 3	2+25	2354
2	"	"	SNA	883 9	886 0	1457	1712	2 1	2+15	2386
3									+	
4									+	
5									+	
6									+	
							TRIP TOTALS	4 4/1	4+40	

ROUTE	ALT	ETE	FOB
IFR			
"			
DAT 4 4 FLT ACTUAL (A)			
6 8 STAY			
(A) CLR QUOTE DUE TO DELAYS IN/OUT		DEN (WX + ATC)	

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.	3741 6	3720 8	2209	3348 1	2634	2527
TRIP TIME	4 4	4 4	2	4 4	2	2
TOTAL TIME	3746 0	3725 2	2211	3352 5	2638	2529

AIRCRAFT CHECKED AND FOUND AIRWORTHY. PRE FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED

PIC (Signature)

NOTES: breakfast $. 5-
Fresh Fruit - Danish 5
Sr. Fare on Redeye
DP - 1 hr 46

FEC Ex. # 24
In MUR 4/12/88
2583

****

*** LEAR 35 ***

WINTER: 1200 lb min P/L $1195.00 /Hr

Leg Num	From Apt	To Apt	Tru Crs	Dist nmi	Fuel Stops	ETE Hrs+Min	Allow load Pounds	Fuel Burn
1	SNA	DEN	56	723	0	1+56	3250	2526
2	DEN	SNA	244	723	0	2+ 4	3250	2667
Subtotals				1,445 nmi		4.0 Hour(s)		5,193 lbs

Flight time charges	$4,780.00
6.8 Individual standby hour(s)	$340.00
0 Overnight(s) (Incl one day's standby each)	$0.00
Extra items	$10.00
8% Tax	$410.40
Totals 1,445 nmi 4.0 Hour(s)	$5,540.40

****

DEN STAPLETON INT'L...DENVER CO

SNA JOHN WAYNE ARPT SANTA ANA CA

****

MartinAviation Inc.
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: K1205
KARL- LORIMAR HOME VIDEO
ATTN: MIKE SEVERY
17942 COWAN
IRVINE, CA. 92714

INVOICE NO. 07104
INVOICE DATE 2/18/87

FLIGHT DATES: 2/18/87 to 2/18/87
ITINERARY : SNA DEN SNA

INVOICE NO. 07104

AIRCRAFT : 58RW
PILOT IN COMMAND.... PHIL AMSDEN
SECOND IN COMMAND... GARY ODELL

FLIGHT LOG NUMBER.. 2346

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	4.4	1,195.00	5,258.00	
Wait Hours	6.8	50.00	340.00	
Max Wait				
Rons				
		Total Flight Charge ..		5,598.00
LANDING FEE	1	10.00	10.00	
CATERING	1	302.38	302.38	
		Total Misc. Charges ..		312.38
		Sub-Total		5,910.38
		Transportation Tax ...		472.83
		Flight Total		6,383.21

Comments
AUTHORIZED BY: MIKE SEVERY
KL-0050

*** TERMS: NET 15 ***

#14 THEJ Lear 30435 Exhibit Twenty-five

Date: 2/24/87 ACFT: 3794Y
PIC: P Amsden PIC SIC: K. Gibson
Sched. By: BF Date: 2/20

FLIGHT LOG

PIC KI805 MA № 2296F

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 852-8300

07

AUTHORIZED BY: MS CUSTOMER: S. Kael

ADDRESS:

QUOTE: PHONE: (W) (H)

AE BA MC CASH CHECK ~~CREDIT~~ PAID

ITINERARY: SLA TO SMO ~~1930~~ 1130 SMO TO DEN 1300 DEN TO SMA 1700 WND

TO TO TO

PAX: S Kael + ~~Tom Eppstein~~ + GRIFF AMES

LEG NO	1	2	3	4	5	6
TOW	15400	14200	14400			
MATOW	15697	17647	17966			
C.G. LOCATION	376.6	379.6	379.3			
C.G. LIMITS	374.1 - 457.0	374.3 - 357.0	373.3 - 557.0			

4.3	FLT. HOURS @ 1195	= 5138.50
3.8	WAIT HOURS @ 50	= 190.00
	MAX. WAITS @	=
	RON'S @	= 60.00
3	MISC @ 10	= 30.00
	SUBTOTAL	=
1421.50	FED. TAX 5% 8%	= 427.88
	FLIGHT TOTAL	= 5836.38

LEG NO	PAX	DATE	AIRPORT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK OUT	BLOCK IN	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED
1	1	2.24	SMO	1766	1761	1157	1225	.4	0+28	410
2	2	2.24	DEN	1761	1768	1310	1515	1.1	2+05	2400
3	"	"	SMA	1768	1771	1708	1935	2.2	2+27	2730
4									+	
5									+	
6									+	
					TRIP TOTALS			4.3	5+00	5560

ROUTE	ALT	ETE	FOB
FFA			
PAY 4.3 FLT			
" 3.8 STBY			
PAY KG PIC RATE — NO SIC AVAIL.			
Ver BF			

FLT TIME	AIRFRAME	ENG NO. 1	CYCLES	ENG NO. 2	CYCLES	LDGS
TIME FWD.	2490	2490	2533	2490	2419	2551
TRIP TIME	4	4	3	4	3	3
TOTAL TIME	2995	2995	2536	2995	2422	2554

AIRCRAFT CHECKED AND FOUND AIRWORTHY PRE FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED

PIC (Signature)

NOTES KL-0051

(ATA - ~~DR~~ 3.8 NOT DRAWN SMO Sandusky) DEN Fo. 4

DEN - SLA - Charter/crank ~~$400~~ 4 Pax

FEC EX. # 25
MUR 2583
W. HUNT 4/12/88

****

*** LEAR 35 ***

WINTER: 1200 lb min P/L $1195.00 /Hr

Leg Num	From Apt	To Apt	Tru Crs	Dist nmi	Fuel Stops	ETE Hrs:Min	Allow load Pounds	Fuel Burn
1	SNA	SMO	305	35	Ø	Ø+16	3225	397
2	SMO	DEN	58	736	Ø	1+57	3225	2547
3	DEN	SNA	244	722	Ø	2+ 4	3225	2666
Subtotals				1,493 nmi		4.3 Hour(s)		5,611

Flight time charges	$5,138.50
3.Ø Standby hour(s)	$150.00
Ø Overnight(s)	$0.00
Extra items	$30.00
8% Tax	$425.48
Totals 1,493 nmi 4.3 Hour(s)	$5,743.98

****

SMO SANTA MONICA CA

DEN STAPLETON INT'L, DENVER CO

SNA ORANGE COUNTY JOHN WAYNE, SANTA ANA CA
MARTIN AVIATION... NEXT TO TERMINAL

****

9 3 0 4 3 5 3 3 7 3

PURCHASE ORDER

PURCHASE ORDER NUMBER
78206
THIS NUMBER MUST APPEAR ON ALL INVOICES PACKING SLIPS PACKAGES & CORRESPONDENCE

MartinAviation, Inc.

19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO Transport. Concept. SHIP TO Vicki

ADDRESS _____ ADDRESS _____

CITY _____ STATE _____

DATE	DEPARTMENT	REQUISITION NO.	SHIP VIA	TERMS	RESALE PERMIT NO
2/24	Charter	511007			SREA24097067

	QUANTITY ORDERED	QUANTITY RECEIVED	INVOICE NO.	DESCRIPTION	PRICE	NET
1				N37954		
2				S. Karl		
3				Sandwich for 4 pax	60 00	
4				deliver by 1130		
5				MAIL 2396		
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
16						
17						
18						
19						

PLEASE SEND TWO (2) COPIES OF YOUR INVOICE WITH ORIGINAL BILL OF LADING.

Authorized Signature X

ADM-1

VENDOR

TELEPHONE: (714) 852-8300

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: K1295
KARL - LORIMAR HOME VIDEO
ATTN: MIKE SEVILLY
17942 COWAN
IRVINE, CA 92714

INVOICE NO. 07263
INVOICE DATE 3/28/87

FLIGHT DATES: 3/09/87 to 3/09/87
ITINERARY : SNA SMO DEN SNA

INVOICE NO. 07263

AIRCRAFT : 3784
PILOT IN COMMAND.... PHIL AMSDEN
SECOND IN COMMAND... KEN GIBSON

FLIGHT LOG NUMBER.. 2296

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	4.3	1,195.00	5,138.50	
Wait Hours	3.8	50.00	190.00	
Max Wait				
Rons				
		Total Flight Charge ..		5,328.50
CATERING	1	60.00	60.00	
LANDING FEE	2	10.00	20.00	
		Total Misc. Charges ..		80.00
		Sub-Total		5,408.50
		Transportation Tax ...		427.88
		Flight Total		5,836.38

Comments
KL-0054
PAX: S. KARL & GRIFF AMES

*** TERMS: NET 15 ***

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: K1205
KARL- LORIMAR HOME VIDEO
ATTN: MIKE SEVERY
17942 COWAN
IRVINE, CA. 92714

INVOICE NO. 07328
INVOICE DATE 2/28/87

FLIGHT DATES: 0/00/00 to 0/00/00
ITINERARY :

INVOICE NO. 07328

AIRCRAFT : 37984

FLIGHT LOG NUMBER.. 2296F

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	4.3	1,195.00	5,138.50	
Wait Hours	3.8	50.00	190.00	
Max Wait				
Rons				
		Total Flight Charge ..		5,328.50
CATERING	1	60.00	60.00	
LANDING FEE	2	10.00	20.00	
		Total Misc. Charges ..		80.00
		Sub-Total		5,408.50
		Transportation Tax ...		427.88
		Flight Total		5,836.38

Comments

*** TERMS: NET 15 ***

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: K120
KARL - LORIMAR HOME VIDEO
ATTN: MIKE SEVERY
17242 COWAN
IRVINE, CA. 92714

INVOICE NO. 07328
INVOICE DATE 2/28/87

FLIGHT DATES: 0/00/00 to 0/00/00
ITINERARY .

INVOICE NO. 07328

AIRCRAFT : 3798A

FLIGHT LOG NUMBER.. 2296F

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	4.3	1,195.00	5,138.50	
Wait Hours	3.8	50.00	190.00	
Max Wait				
Rons		-		
		Total Flight Charge ..		5,328.50
CATERING	1	60.00	60.00	
LANDING FEE	2	10.00	20.00	
		Total Misc. Charges ..		80.00
Comments		Sub-Total		5,408.50
		Transportation Tax ...		427.88
		Flight Total		5,836.38

*** TERMS: NET 15 ***

9304353337 8

Hart ex-aide tied to donation scheme

6297N

Karl assistant, others identify '84 fund chief

By Michael A. Lodnovich, Joan O. Pisco and Larry Peterson
© 1988, The Orange County Register

Gary Hart's 1984 national finance director told Newport Beach millionaire Stuart Karl how to disguise illegal contributions to the Hart campaign and knew that those donations were being hidden from federal officials, say Karl's former chief assistant and three other sources familiar with the fund raising.

Douglas Rosen of Los Angeles began advising Karl, 34, in late 1983 on how to raise the funds and conceal them, said Abraham Kantzabedian, who worked closely with both men while employed at Karl Home Video from 1983 to mid-1985.

Rosen oversaw Hart's 1984 campaign effort that raised $9 million and was active in helping Hart find contributors in a continuing effort to pay off a $2.2 million '84 campaign debt that now stands at $1.1 million.

Although Rosen has held no official title with the candidate's 1988 effort, Hart officials said Rosen was one of Hart's active California supporters until he temporarily dropped out of the presidential race last May after revelations about his relationship with Miami model Donna Rice.

As Karl's right-hand man at Karl Home Video, which eventually became Karl-Lorimar Home Video, Kantzabedian was the chief assistant in charge of finances and said he knew that Karl had arranged to funnel thousands of dollars of illegal contributions into Hart's 1984 effort.

"I'm the dirty laundry of the Hart campaign. I've kept quiet long enough. The truth needs to come out," Kantzabedian said in an interview with the Register on Tuesday. "Rosen told Stuart how to raise the money and hide the money. Stuart was pressured by the campaign to come through with the bucks."

Rosen, reached in Los Angeles, denied the allegations.

Kantzabedian said Karl was told by Rosen how to raise and disguise the funds. He said he personally delivered $5,000 in computer equipment from Karl for Hart's Los Angeles office and paid for three leased automobiles for Hart campaign workers. Rosen also helped disguise Hart campaign expenses paid by Karl into a company fund for a never-completed video about Hart, Kantzabedian said.

Kantzabedian also said he was a

8 Please see KARL/12

> "I'm the dirty laundry of the Hart campaign. I've kept quiet long enough. The truth needs to come out. Rosen told Stuart how to raise the money and hide the money. Stuart was pressured by the campaign to come through with the bucks."
>
> **Abraham Kantzabedian**
> Chief financial assistant to Stuart Karl from 1983 to mid-1985

> "I've worked for Gary Hart for 15 years and we don't do that. I am not involved, nor is anyone else on the Hart campaign."
>
> **Douglas R[illegible]**
> Gary Hart's 1984 national finance d[illegible]

MORE →

ORANGE COUNTY REGISTER
JANUARY 29, 1988

FEC v. Hunt
MUR 2553.
4/2/88

EXHIBIT 2

9304353379

FROM 1

passenger on five chartered Learjet flights during 1983 and 1984 during which Rosen was ferried to Hart campaign appointments. Karl paid about $50,000 for those trips, Kantzabedian said. The trips included a flight to John Wayne Airport from the 1984 Democratic convention in San Francisco in July, and a $14,000 round-trip flight from John Wayne to Washington, D.C., in May 1984.

Kantzabedian said he used his first and middle names — Abraham Levon — to bill the airplane charters on Karl's American Express card to conceal the trips.

"No one would identify that name with the Hart campaign," he said.

Hart's campaign reports for the period between July 1983 through July 1984, filed with the Federal Election Commission, do not list any in-kind contributions from Stuart Karl under "individual contributions." The records do indicate that Karl had contributed a total of $1,000 — the maximum allowed — as of Nov. 29, 1983.

Rosen called all the allegations "preposterous" and said he had no knowledge of any illegal fund raising on behalf of Hart.

"I've worked for Gary Hart for 15 years and we don't do that," he said. "I am not involved, nor is anyone else on the Hart campaign."

Rosen said Karl was a fund-raiser and "Whatever Stuart did, he did. I didn't know about it."

Karl has been unavailable for comment.

Rosen acknowledged that he had flown on Karl's Learjet during the 1984 campaign but said it was a common practice for members of Hart's executive finance council to hitch rides on charter flights.

"A lot of members of the executive finance council had chartered planes and it was nothing to piggyback with them if they were going in your direction," he said.

Rosen said he did not know if the trips were reported to the FEC.

Kantzabedian said he was among 15 Karl Home Video employees who made a total of $12,250 in bogus contributions to Hart's 1984 campaign. The employee checks, collected by Karl and handed over to Rosen, later were repaid to employees in cash by Karl, Kantzabedian said.

During one such employee solicitation at Karl's Newport Beach office in February 1984, Kantzabedian said Rosen and Karl discussed the employee donations.

"Rosen said to Karl in the office, 'How is this (the employees) to be handled,' meaning the cash repayment to employees," Kantzabedian said. "Stuart said to Rosen, 'Don't worry, Rama (White Middel) is already taking care of it.'"

Middel, at that time Karl's executive aide, has told the Register that she reimbursed $30,000 to employees from Karl's personal bank account for contributions made to Hart and two other congressional candidates.

"I know Rosen knew about everything. I was there when Rosen had the conversations with Karl. I handled the billing for campaign expenses. Stuart told me what to do and told me Rosen wanted him to do it that way," Kantzabedian said.

Kantzabedian recalled another incident late in Hart's unsuccessful bid to win the 1984 Democratic nomination, when the Hart campaign telephoned Karl with an urgent plea for $20,000.

Stuart came out of his office and pounded his fist against the wall. He told me Rosen's people called saying they needed $20,000. It was a crisis and they had to have the money," Kantzabedian said. "Stuart was angry. He said 'What the (expletive) do they do with all that money I give them?'"

A source who attended several Hart campaign-finance meetings also confirmed that Rosen and Karl had discussed illegal fund-raising. The source said the discussions took place during four private meetings held between 1983 and 1986.

The source, who spoke on the condition of being unnamed, said the meetings involved Karl, Rosen and Hart campaign strategists.

The first meeting took place in August 1983, after Rosen had obtained Karl's name from a list of Democratic activists.

Doug told Stuart he needed his help with fund raising. Then he told us how we could check-swap (employees) and hide money," the source said. "We were reassured that everybody with Hart was doing it. Doug said other candidates had and were doing it. ... There was no problem."

The source said methods discussed at the first meeting included:

■ Using employees of Karl's video company as contributors and then repaying workers in cash. The Register has disclosed that Hart received $17,000 in such contributions for his 1984 and 1988 campaigns.

■ Paying Hart's campaign expenses such as printing, materials, Learjet trips, limousines, rent-a-cars and parties and then listing the items as expenses of Karl Home Video.

■ Masking other Hart campaign contributions as being connected with a for-profit home video, "Gary Hart: The Candidate," that involved Karl and Rosen.

Kantzabedian confirmed that all three methods were used by Rosen and Karl to conceal the money.

"They always talked in a sort of code. Rosen always was very careful about what he said. But since I was handling the financial records, video budgets and travel schedules, I knew what they were talking about," he said. "And at the end of the day, Stuart and I would sit in his office and he would tell me everything that was going on. I couldn't believe it."

Rosen said he was living in New York in August 1983 and never attended any meetings with Karl before Jan. 4, 1984, when he was named Hart's finance manager.

"On that date I became involved in the Hart campaign," he said.

Rosen denied ever talking to Karl about hiding contributions.

"That's an absolute lie. I didn't know of any funds being hidden from federal officials," he said.

Susan Casey, Hart's campaign manager, could not be reached for comment.

"I don't really have any response at all right now," said Bernie Schneider, general counsel for the Hart campaign. "We will look into it."

Schneider said he knew nothing of the alleged activities.

"I remember a guy named Abraham (who worked for Karl)," he said. "I thought he was a driver."

Asked about how the allegations would reflect on the Hart campaign, Schneider said, "I don't know. I really don't have anything to say."

Schneider added, however, that he has begun questioning "Doug and all the other people connected with this." He said he has had "two or three" conversations with Rosen since The Miami Herald first published an account last week about alleged Karl-related campaign-finance irregularities.

"I'm trying to get to the bottom of the problem," he said. "That is all I have to say."

Kantzabedian said Karl had become enraptured with the glamour of Washington politics and the power of government after first meeting Academy Award-winning actress Jane Fonda, a political activist, and her husband, Tom Hayden, a Democratic state assemblyman, in 1982.

Karl had made millions through marketing the Jane Fonda Workout and Playboy home videos. He had contracted with Rosen's Visual Eyes Company to do post-production on the projects. Rosen has since sold Visual Eyes and has no involvement with the firm, company officials said.

"The Hart people were telling Stuart they would make him an ambassador if Gary Hart was elected president," Kantzabedian said. "I remember one day, after Stuart had counted all the money he gave, he said, 'I can't believe what it costs to become an ambassador somewhere.'"

Days after the August 1983 meeting, the source said there was a second fund-raising session in which Rosen brought along a "slew of Hart campaign people."

The source said the same topics were discussed between Rosen and Karl.

Rosen denied attending any meetings with Karl before 1984. When asked which Hart campaign people were dealing with Karl before 1984, Rosen said, "I don't know. I got Stuart's name off a (contributors') list."

Rosen said his involvement with Hart fund raising ended with the July 1984 Democratic Convention in San Francisco.

But Billy Shore, special assistant to Hart during the first 1984 campaign and a key '84 campaign insider, said that Rosen was one of the California people involved in helping find contributors to pay off $2.2 million in debts for the '84 effort.

Shore also said Rosen later became a supporter for the Hart 1988 effort until the incident with Rice resulted in Hart temporarily quitting the race.

Sources said two more conversations took place about Hart's financial problem after the convention.

One conversation on methods to raise money to repay '84 debts was conducted during festivities at the 1985 Kentucky Derby at Churchill Downs in which the Rosen family had entered a horse named "Chief's Crown."

The conversation took place, the source said, following a post-race party in which Rosen had entertained Hart and his wife, Lee, and

MORE →

Karl and his wife, Debra.

Again, the discussion focused on questionable fund raising. How to get the most out of Stuart and his friends without anyone knowing, the source said.

The source said Hart was not included in that discussion.

Rosen said Karl was his guest for the derby, but that no fund-raising meeting took place.

"My horse lost. It was a post-mortem," he said. "There were no meetings."

Kantzabedian said he left Karl-Lorimar Home Video in July 1985 because of the pressure exerted by Karl and Rosen in the fund-raising efforts.

"I had a long talk with Stuart, friend-to-friend, and I told him something is wrong with all these contributions. I told him we're dealing with the government and that it was a heavy-duty game that I didn't want to play anymore," he said.

Kantzabedian said Karl shrugged his shoulders and told him, "I don't know what to say. All I know is that I've got to take care of it."

The Register previously has disclosed that Karl continued his fund-raising for Hart and for the unsuccessful 1986 congressional races of Kathleen Kennedy Townsend of Baltimore and Orange County Superior Court Judge David Carter.

Although no longer the Hart finance manager, Rosen remained in fund raising. A former Karl-Lorimar executive said Rosen and Karl again discussed disguised Hart campaign money in the fall of 1986.

That conversation between Rosen and Karl was during a Learjet flight from Teterboro, N.J., to John Wayne Airport, according to the executive, who was on the airplane and overheard the discussion.

"Rosen and Stuart were discussing the 1984 campaign debt on the way back to the coast," said the executive, who asked not to be named. "Stuart said to Rosen, 'Listen, I've hidden the (campaign) '84 contributions. Am I ever going to get my money back?'

The executive said Rosen assured Karl that he would be repaid and said "You've done a great job in fund raising. We look for more (financial) support from you."

The executive said Karl was concerned with his "sizable investment" in the Hart campaign.

Rosen said he was not involved with Hart in 1986, but then retracted the statement and said he might have held "a debt-retirement fund-raiser in New York."

He said he was on Karl's chartered Learjet, but it involved private video business, not the Hart campaign.

Former Karl-Lorimar employees have told the Register that Rosen maintained a constant presence at the Karl Home Video office in Newport Beach and later at the Irvine office when the company became Karl Lorimar in 1986. The business is defunct as of 1987.

Rosen was a regular in Stuart's office. Every couple of weeks he would spend a few days at Karl-Lorimar that focused on the Hart campaign," said another former Karl-Lorimar worker. "When Rosen telephoned the office, he had the same status as the president of Lorimar — he was to be put right through to Stuart."

The Register disclosed last week that Karl employees had been pressured into giving a total of $12,250 to the 1984 campaign, and $4,500 in December 1986 in bogus contributions to Hart's 1988 campaign that were later were repaid in cash by Karl.

Rosen denied being active in the 1988 Hart effort before the Rice incident. But when told of Shore's statements, said, "I am participating ... putting some things together."

He would not specify his role.

Karl and Rosen also were active in a project called "the Gary Hart video." Publicly, they told workers the video was a private venture that would be marketed for sale at video stores. Karl and Rosen said the project did not involve the Hart campaign.

But Kantzabedian and one other source involved with Hart fund-raising said the video was another vehicle that Karl used to conceal funds to Hart's campaign.

The Hart video crumbled after The Miami Herald disclosed Hart's relationship with Rice.

"It was a means to channel cash to the Hart people without anyone checking," the source said. "If the Hart video was a private venture, the FEC people wouldn't even look at it. Of course, it wasn't private. It was directly involved with the Hart campaign."

A former Karl employee who arranged flights for Karl in 1986 and early 1987 said Rosen flew four times with Karl in August and September 1986.

The employee said he did not know what transpired on the flights, but said Rosen was known as a key member of Hart's campaign. Karl paid for all of the flights, said the employee, who asked not to be identified.

However, an executive who was on the majority of flights was told by Karl that Rosen was making the trips as "Gary Hart's public-relations man."

Another Karl employee familiar with the workings of the executive office confirmed that Rosen was introduced to the staff as a member of Hart's campaign. She said the constant topic between Karl and Rosen was how to pay off the debt from Hart's 1984 campaign.

Register staff writer Robin Goldstein in Washington contributed to this report.

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STENOTYPE REPORTERS

12 July 1988

88 JUL 14 PM 1:34

Federal Election Commission
ATTN: Ms. Celia Jacoby
999 E Street, Northwest
Washington, DC 20463

Re: Deposition of RAMA L. MIDDEL,
Los Angeles CA, 13 April 1988.

Dear Ms. Jacoby:

Enclosed is the Original copy of the above-entitled deposition, which has been read and signed by the Deponent. The following corrections are noted in this transcript:

Change "Stewart Karl" to "Stuart Karl" on Page 7 line 4, Page 7 line 5, Page 7 line 22, Page 7 line 24, Page 8 line 11, and Page 8 line 12.

Sincerely,

Edwin G. Crowley
Deposition Supervisor

9304353381

TRANSCRIPT OF PROCEEDINGS

UNITED STATES OF AMERICA

ORIGINAL

BEFORE THE

FEDERAL ELECTION COMMISSION

- -x
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IN THE MATTER OF: :
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MUR 2583 :
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- -x

DEPOSITION OF RAMA L. MIDDEL

C O N F I D E N T I A L

Los Angeles, California

Wednesday, April 13, 1988

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BEFORE THE

FEDERAL ELECTION COMMITTEE

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) MUR 2583
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DEPOSITION UPON ORAL EXAMINATION OF

RAMA L. MIDDEL

BE IT REMEMBERED that, pursuant to Notice of Deposition and on Monday, the Thirteenth day of April 1988, commencing at the hour of 9:30 a.m. thereof, at the Federal Building, Room 7210, 300 North Los Angeles Street, Los Angles, California, before me, HARRY ATTMORE Notary Public in and for the County of Los Angles, State of California, personally appeared

RAMA L. MIDDEL

called as a witness by the Federal Election Committee who, being by me first duly sworn, was thereupon examined and interrogated as hereinafter set forth.

oOo

9304353838

For the Federal Election Committee:

JONATHAN BERNSTEIN, Esq., and
CELIA JACOBY, Esq.
Federal Election Committee
999 "E" Street, NW
Washington, D. C. 20463

For the Deponent, Rama L. Middel:

ALVIN S. MICHAELSON, Esq.
Michaelson & Levine
1900 Avenue of the Stars, Suite 2512
Los Angeles, California 90067

ooo

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EXHIBITS

DEPOSITION'S	IDENTIFIED
None.	

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D E P O S I T I O N

11:30 a.m.

MS. JACOBY: We are here to day as part of an investigation under the Federal Election Campaign Act. Section 437(g) of that Act requires this investigation to remain confidential.

Present today for the Federal Election Commission are Jonathan Bernstein and Celia Jacoby. The witness today is Rama White Middel, and here on her behalf is Alvin Michaelson.

Would you please swear the witness.

Whereupon,

RAMA LOUISE MIDDEL

called as a witness by the Federal Election Committee, being duly sworn by the Notary Public to tell the truth, the whole truth and nothing but the truth, was examined and testified as follows:

EXAMINATION

BY MS. JACOBY:

Q Would you please state your name and address for the record.

A Rama Middel, 4536 Roxbury Drive, Irvine, California.

Q Have you had your deposition taken before? Have you ever participated in a deposition?

A What kind of--

MS. JACOBY: I just want her to understand that her testimony is under oath, and that it is--

MR. MICHAELSON: You understand that your testimony is under oath?

THE WITNESS: Yes.

MR. MICHAELSON: Well, just let me repeat what I just said. I am Alvin Michaelson and I just asked Mrs. Middel whether she understood that her testimony here would be under oath; and she said she did.

BY MS. JACOBY:

Q Mr. Michaelson is here in his capacity as counsel to you?

A Yes.

Q Very well.

On March 3, the Federal Election Commission issued a subpoena to you to produce certain documents. Did you receive that subpoena?

A Yes.

Q And have you produced the documents responsive to that subpoena?

A Some of them.

Q Some of them? Could you tell us what documents you did produce?

A I sent you copies of the checks that I had

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written according to what you had asked for. You asked for all documents. Other documents I had are not in my possession.

Q In whose possession are they now?

A FBI.

Q The FBI has possession of all other documents responsive to the subpoena that you do not control?

A Yes.

Q Did you give them to the FBI under a subpoena?

A Yes, I did.

Q You did. Are you aware of any other documents that might be responsive to the subpoena, whether held by you or anyone else?

MR. MICHAELSON: I think that that would be something beyond the purview of what we had talked about. I don't think she should answer that question yet. Her knowledge of other things I think is not really relevant--

MS. JACOBY: Very well.

MR. MICHAELSON: --to what we discussed prior to this time.

BY MS. JACOBY:

Q Would you be able to describe, generically, those documents that you did give to the FBI under subpoena?

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A Yes.

Q Would you do so, please.

A They were three years of checks and statements of ~~Stewart~~ STUART Karl's.

Q When you say of ~~Stewart~~ STUART Karl's, you mean checks that he had written under his bank account?

MR. MICHAELSON: You know, I think we talked about this. The record should reflect that we have had a long conversation off the record with respect to the purview of what would be discussed here during this deposition today. It was understood that the questions that would be asked, and the questions that would be answered, had only to do with the production of documents and the subpoena. We also, I think, understood in advance that there might be some concern as to the nature of certain things produced, and why they were being produced elsewhere, and the reasons for not going into details on those things.

MS. JACOBY: I agree we did have a conversation regarding the nature of a question concerning the production of documents. However, I found there is some ambiguity in saying checks of ~~Stewart~~ STUART Karl. I was not sure she meant her personal checks that she wrote to Stewart Karl or checks written by ~~Stewart~~ STUART Karl.

MR. MICHAELSON: That is my concern.

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Because, once she starts talking about things that were written by other people herself, or anyone else, I think that that will be a problem relating to what we had discussed previously.

MR. BERNSTEIN: Let's go off the record for a minute.

(Discussion off the record.)

MR. BERNSTEIN: On the record.

BY MS. JACOBY:

Q Ms. Middel, is it true that you produced checks of yourself and ~~Stewart~~ STUART Karl, and bank statements of yourself and of ~~Stewart~~ STUART Karl, to the FBI?

A Yes.

MS. JACOBY: Thank you.

At this time, we will adjourn this deposition. It will resume 9:30 a.m. on April 26.

Off the record.

(Whereupon, at 11:42 a.m., the deposition in the above-entitled matter was adjourned to reconvene at 9:30 a.m., April 26, 1988.)

Rama L. Middel
RAMA L. MIDDEL

Subscribed and sworn to before me this 5th day of July, 1988

Joyce F. Lowden
Notary Public

My Commission Expires 8-8-88

OFFICIAL SEAL
JOYCE F. LOWDEN
Notary Public California
ORANGE COUNTY
My Comm. Expires 8/8/88

9304350 33900

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I, Harry Attmore, a Notary Public for the State of California, certify:

At the time and place therein set forth in the foregoing transcript, the witness, Rama Louise Middel was put on oath by me.

IN WITNESS WHEREOF, I have subscribed my name and affixed my seal this 13th day of April, 1988.

Harry Attmore

NOTARY PUBLIC IN AND FOR THE STATE OF CALIFORNIA

OFFICIAL SEAL
HARRY ATTMORE
NOTARY PUBLIC - CALIFORNIA
LOS ANGELES COUNTY
My Comm. Expires Nov 6, 1989

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MUR # 2583

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UNITED STATES OF AMERICA

BEFORE THE

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IN RE: :
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MATTER UNDER REVIEW 2583 :
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88 JUN -9 PM 12:13

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DEPOSITION OF RAMA L. MIDDEL

(NON-APPEARANCE)

Los Angeles, California

Tuesday, April 26, 1988

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BEFORE THE

FEDERAL ELECTION COMMISSION

MATTER UNDER REVIEW	)	MUR 2583

DEPOSITION UPON ORAL EXAMINATION OF

RAMA L. MIDDEL

BE IT REMEMBERED that, pursuant to adjournment and on Tuesday, the Twenty-sixth day of April 1988, commencing at the hour of 9:30 a.m. thereof, at the Federal Building, Room 7210, 300 North Los Angeles Street, Los Angles, California, the following proceedings were had.

oOo

9304335393

For the Federal Election Committee:

JONATHAN BERNSTEIN, Esq., and
CELIA JACOBY, Esq.
Federal Election Committee
999 "E" Street, N. W.
Washington, D. C. 20463

For the Deponent, Rama L. Middel

ALVIN S. MICHAELSON, Esq.
MICHAELSON & LEVINE
1900 Avenue of the Stars, Suite 2512
Los Angeles, California 90067

oOo

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WITNESS:

(None)

EXHIBITS

(None)

MR. BERNSTEIN: On the record this morning in Commission's Investigation, Mater Under Review No. 2583.

I am Jonathan Bernstein, and my colleague is Celia Jacoby, and we are here this morning to depose, as a witness and a respondent, Ms. Rama White Middel.

We initiated this deposition on April 13th, and we adjourned until today on the record on that date, today, April 26th, to allow counsel, who had only recently come into the case, to fully acquaint himself and his client, Ms. Middel, agreed to the new date of April 26th. And, furthermore, on April 19th, we sent a letter by Federal Express confirming the change of the date. And this morning, Ms. Middel is absent, is not present for the deposition.

Mr. Michaelson, I wonder because, frankly, I doubt that the people back home at the FEC will believe this -- if you would please state on the record the reasons why your client, after being notified and understanding of the new date for this deposition, is not here.

MR. MICHAELSON: I'll try and do the best I can.

My information is that she is with her husband on a business trip on a boat, which she left

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last week to Mexico. She was scheduled to be back here before today so she could be here today. She was of course aware of the date, and apparently due to some bad weather on this trip -- and this was not a pleasure trip; it was a business trip of her husband -- we were notified yesterday that there was some problem because of bad weather and that the trip home had been delayed and that she could not be here this morning but that there was every reason to believe that she would be back in the Southern California area today and could be present at the continuation of the deposition tomorrow morning, Wednesday, April the 27th.

And so, I am requesting that the matter be trailed, her deposition be trailed until tomorrow morning, and I have every reason to believe that she will be here. She has kept in contact with our office. We expected to hear from her last night, but for one reason or another we did not hear from her. And as soon as I hear, I will contact you, Mr. Bernstein, or Ms. Jacoby, and confirm that tomorrow, Wednesday, at the same time is appropriate.

MR. BERNSTEIN: In an effort to be as accommodating as we can, Mr. Michaelson, and in view of your representations that Ms. Middel intends to cooperate in our investigation --

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MR. MICHAELSON: Well, you know, that is my understanding. I can't say for sure since she's not here.

MR. BERNSTEIN: I understand that. And in view of the obvious fact that she isn't here and that I understand you're not prepared to testify and give evidence --

MR. MICHAELSON: No, I have no personal information about the case.

MR. BERNSTEIN: -- we will agree to resume tomorrow morning and ask that we would begin at an earlier time than today, perhaps 9:00 in the morning, April 27th, Wednesday, tomorrow. Would that be agreeable to you, Mr. Michaelson?

MR. MICHAELSON: Yes, that's fine.

THE EXAMINER: Okay. If that's the case, then we will resume tomorrow with, hopefully, a better outcome than today.

MR. MICHAELSON: I hope so.

MR. BERNSTEIN: Off the record.

(Whereupon, at 10:16 a.m., the proceeding was adjourned, to reconvene on Wednesday, April 27, 1988, at 9:00 a.m.)

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UNITED STATES OF AMERICA

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DEPOSITION OF RAMA L. MIDDEL

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Wednesday, April 27, 1988

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BEFORE THE

FEDERAL ELECTION COMMISSION

MATTER UNDER REVIEW	)	MUR 2583

DEPOSITION UPON ORAL EXAMINATION OF

RAMA L. MIDDEL

BE IT REMEMBERED that, pursuant to adjournment and on Wednesday, the Twenty-seventh day of April 1988, commencing at the hour of 9:30 a.m. thereof, at the Federal Building, Room 7210, 300 North Los Angeles Street, Los Angles, California, before me, HARRY ATTMORE Notary Public in and for the County of Los Angles, State of California, personally appeared

RAMA L. MIDDEL

called as a witness by the Federal Election Committee who, being by me previously sworn, was thereupon examined and interrogated as hereinafter set forth.

oOo

9304353400

For the Federal Election Committee:

JONATHAN BERNSTEIN, Esq., and
CELIA JACOBY, Esq.
Federal Election Committee
999 "E" Street, N. W.
Washington, D. C. 20463

For the Deponent, Rama L. Middel

ALVIN S. MICHAELSON, ESQ.
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MR. BERNSTEIN: This morning we are on the record in the course of a Federal Election Commission investigation entitled MUR 2583. We are here for the deposition of Rama White Middel, who is a respondent and a witness in the Commission's investigation.

The Commission's investigation is a civil investigation under the Federal Election Campaign Act, and the Act requires that such investigations are held confidential under they are completed.

Mr. Reporter, would you swear in the witness, please.

Whereupon,

RAMA LOUIS MIDDEL

called as a witness by the Federal Election Commission, being duly sworn by the Notary Public to tell the truth, the whole truth, and nothing but the truth, testified as follows:

EXAMINATION

BY MR. BERNSTEIN:

Q. Please state your full name.

A. Rama Louise Middel.

Q. And is there another name, Ms. Middel, that you've used since 1982?

A. Yes, Rama White.

Q. Thank you. And what is your address and

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telephone number?

A. My address is [redacted] My phone number is Area Code [redacted]

MR. MICHAELSON: Before we go further, Jonathan, just for the record, Alvin Michaelson appearing on behalf of Rama Middel. We had talked prior to going on the record, and there was some indication that Ms. Middel would be informed of the procedures that are used in investigation and how it works.

MR. BERNSTEIN: That's fair enough. We'll get to that in a moment.

MR. MICHAELSON: Okay.

BY MR. BERNSTEIN:

Q. Mr. Michaelson just identified himself, Ms. Middel. Do I gather that he is representing you here this morning?

A. Yes, he is.

Q. Ms. Middel, earlier I handed you a three-page statement entitled, "To the Witness." Did you read and understand and sign that statement?

A. Yes.

Q. Do you have any questions about the statement?

A. No.

MR. BERNSTEIN: This statement we have

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marked Exhibit 1 to Ms. Middel's deposition today.

(The document referred to was marked Federal Election Commission's Exhibit No. 1 for identification.)

BY MR. BERNSTEIN:

Q. Ms. Middel, is there someone else attending the deposition with you here today?

A. Yes, my husband.

Q. And what is his name?

A. Richard.

Q. Ms. Middel, let me briefly respond to Mr. Michaelson's request of outlining the procedures that are involved in a Commission investigation. These procedures are described in a pamphlet which we enclose in our notifications of investigations, and the Commission had sent you a notification of this investigation quite some time ago.

Do you recall receiving a copy of the procedures that were included in that?

A. Yes, but I received no pamphlet, as you're speaking of, that I recall.

Q. It was a two-page statement entitled "Procedures" which outlined the way Commission's investigations work.

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In any event, I can certainly summarize them briefly, and that pamphlet goes into a bit more detail.

The Commission is charged with civil enforcement of the Federal Election Campaign laws and has administrative enforcement process and investigatory process. At the onset of that process, the Commission makes findings that there is reason to believe a violation of the law may have occurred. Subsequently, the Commission engages in an investigation and can then proceed to make a probable cause to believe determination.

Before such a determination, a respondent in a Commission investigation can request pre-probable cause conciliation with a view to resolving the matter by the execution of a conciliation agreement. If the Commission makes a probable cause determination, it engages in conciliation, as well, to try to reach a settlement of the matter.

Ms. Middel, let me ask you at this time, did you receive the notification that I was describing of the Commission's investigation?

A. Yes.

Q. In that notification, the Commission included a Factual and Legal Analysis, the basis upon

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which the Commission had made its findings against you. Do you remember reading that?

A. Yes.

Q. Are there any questions that you have about that at this time?

A. No.

Q. Let me ask you, in addition to the notification was enclosed a Subpoena for the Production of Documents. And earlier when we first met on April 13th, you described to us the documents that you thought were responsive to that subpoena.

Please tell us if, in the meantime, you have located or thought of any further documents that would be responsive to that subpoena.

A. No, I have not.

Q. Did you consult with anyone other than counsel to prepare for this deposition?

A. No.

Q. Did you use any documents to prepare?

A. No.

Q. What is your current employment?

A. I'm not employed at this time. Well, I'm working for my husband, Middel Marine.

Q. In what capacity?

A. Whatever he needs me for.

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I was paid -- the last couple of months I was given a salary.

Q. Were you on the payroll of any company during that time?

A. No.

Q. You worked for Mr. Karl personally; is that your best understanding?

A. Business and personal. It was all combined.

Q. But you weren't on the payroll of any firm of Stuart Karl's at the time?

A. No, no.

Q. And can you tell us about your employment prior to that, prior to March 1987?

A. I worked for Karl-Lorimar Home Video as executive assistant to the president.

Q. And when did that begin?

A. That began October 1983.

Q. What were your duties at that time?

A. I was a business and personal secretary.

Q. And I think your title, you said, was executive assistant?

A. I began as executive secretary.

Q. When did you become executive assistant?

A. Oh, April 1985.

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Q. And what was the name of the company when you first joined it?

A. Karl Video Corporation.

Q. What was Karl Home Video?

A. Well, it was the same company They had decided to change the name to Home Video because every other video company was called Home Video.

Q. Do you know when that took place; do you recall?

A. I don't really remember.

Q. Did there come a time that the name of the company changed again?

A. Yes, in approximately November of 1984.

Q. What happened then?

A. It became Karl-Lorimar Home Video.

Q. Why did the name change?

A. Because Lorimar purchased the Home Video company.

Q. Did your duties remain the same after that?

A. Yes.

Q. Did you have supervisory responsibility at all?

A. Yes.

Q. Over who?

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A. Over the other secretaries in the executive area, over the receptionist and over our -- I don't know what to call him. He was a runner, basically, for Stuart. He ran errands.

Q. What was his name?

A. Eddie Herrera.

Q. And who were the secretaries, if you remember?

A. Well, Linda Kinwald, Kathy Walker, at one time Karen Stewart, and Robynne Phillipsen was the receptionist.

Q. Did this supervisory responsibility begin when you became executive assistant, or was that your responsibility from the start?

A. It was my responsibility from the start, but I was the only secretary when I was hired.

Q. Was there anyone else that you supervised?

A. No, not that I can remember.

Q. At this time, Ms. Middel, I would like to hand you a nine-page document, and I wonder if you can look at it and tell me if you recognize it.

A. Yes, I do.

Q. Can you describe that?

A. It's an affidavit of myself.

Q. Is that a statement that you gave regard-

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ing the activities of Stuart Karl, political activities?

A. Yes.

Q. At this time, Ms. Middel, what I'd like to do is to put that aside for the moment -- and this will be Exhibit 2 to our deposition -- and I'd ask that you hold it to one side with the expectation that in the course of the deposition we may refer to it and ask questions about it.

A. Okay.

(The document referred to was marked Federal Election Commission's Exhibit No. 2 for identification.)

BY MR. BERNSTEIN:

Q. For the record, what is the date of this affidavit, Ms. Middel?

A. Executed March 24th, 1988.

Q. Thank you. Could you describe the organizational structure of Karl Video Corporation, Karl Home Video in the early period, the pre-acquisition period?

A. Well, first of all, when I was hired, I was employee number seventeen, so you have to realize it was very small. And it grew to over two hundred people by March of 1987.

When I was first hired, it was Stuart

employees prior to the acquisition?

A. Prior to the acquisition, about twenty-five.

Q. And the acquisition took place approximately when?

A. November of 1984.

Q. And what was the structure of Karl-Lorimar Home Video?

A. It was basically the same as I have described except they kept hiring more people and expanding departments.

Q. What was your understanding of the lines of authority?

A. Well, it was always Stuart, number one, Court Shannon, number two. Dennis Blackburn was -- let me clarify that, why I don't say Dennis Blackburn. Dennis Blackburn was let go November of '84 right at the acquisition date.

Q. Do you know why?

A. Stuart felt he couldn't grow with the company, that he was a small company person and he wasn't -- didn't feel that he could carry on and help the company grow as he wanted it to.

Q. Do you know who the directors, if any, of Karl-Lorimar Home Video were?

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A. I don't know.

Q. Now, going back to the pre-acquisition period, who had financial authority in the company?

A. Stuart Karl and Dennis Blackburn. They were the only two check-signers that I'm aware of for any large amounts of money. I do believe Cathy Bramnick could sign for a few hundred dollars perhaps. But any major amounts would have to be the other two.

Q. How many company bank accounts were there prior to the acquisition?

A. Okay. That was not my department, but I understand there was only one.

Q. Do you know where that --

A. Bank of Newport, Coast Highway and Avocado Streets.

Q. So you say this wasn't your area of expertise, but your best recollection and understanding is that, pre-acquisition period, there was one account at Bank of Newport that the company used?

A. Yes. Well, every check I got was from that bank and every payroll check was from that bank.

Q. Were you familiar with any personal accounts of Stuart Karl?

A. Yes.

Q. Can you describe them?

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A. He had a personal checking account at First Interstate Bank which I would take care of for him. I would keep the check register. I had the power to sign on the checking account and pay his bills for him. I would reconcile his checking account.

Q. Where was this account? I'm sorry.

A. First Interstate Bank, Corona Del Mar.

Q. Was that the account that you had signatory authority?

A. Yes.

Q. Did he have other personal accounts that you are aware of?

A. What time period are we speaking of?

Q. The pre-acquisition period.

A. Okay. I don't recall at this time that there is anything else that he had. I pretty much took care of his finances for him. His wife had other accounts, but I had nothing to do with that. So I pretty much would say that First Interstate Bank, Corona Del Mar was it.

Q. Do you know what the source of funds for that account were?

A. His payroll check and the company. Sometimes he would take money from the company, outside of the payroll check, in other words.

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Q. Did you make deposits into that account?

A. Yes.

Q. Did you do everything regarding that account on behalf of Stuart Karl?

A. Yes. The only time he wrote a check was on a weekend when I wasn't around, basically.

Q. But ordinarily, you wrote the checks on that account?

A. I wrote all the checks.

Q. Do you know the account number of that account, by any chance?

A. No. I used to.

Q. Did Mr. Karl give you written instructions as to -- written directions to prepare checks?

A. No, just verbally. He would tell me what he wanted me to do. Basically, he would give me his bills and put them in his out box each day. And I would take them and sort them into two files, one for the first of the month, one for the middle of the month, and I would just pay them on a timely basis. If I had any question about a bill, I would simply ask him, double check with him before I paid it.

Q. Do you know if there were any -- again, in the pre-acquisition period, any company credit cards?

A. No, I never saw a company credit card,

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nothing that ever said Karl Video Corporation that I ever saw.

Q. Did Stuart Karl or other executives use credit cards for company business?

A. Stuart used his American Express, which was actually his father's card that had his name on it.

Q. He used that for company business?

A. Yes.

Q. Did the company pay the bills for that card?

A. Yes, when it was company business -- and sometimes when it wasn't.

Q. Who made that determination? How did that work?

A. Stuart. Well, he's the president of the company. He owns the company. And if he wanted the company to pay it, he just told them, "Listen, just pay the whole bill."

Q. Who reviewed the bills as they came in? Did he do that?

A. Dennis Blackburn at that time.

Q. And did Blackburn make determinations about who should pay?

A. Yes. Dennis would try to make sure that

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Stuart paid the personal and the company paid the company. He would sort it out and try to make sure that's the way it happened.

Q. But did Karl ultimately take responsibility for making the decision or did Blackburn give you instructions, or did it --

A. Well, ultimately, Stuart would tell me what to do, ultimately. Dennis would give me direction also, but the final decison was always Stuart's.

Q. Now, as to the company account, you already described that you thought Stuart Karl and Dennis Blackburn and occasionally Ms. Bramnick had signatory authority.

A. Yes.

Q. Who had authority to initiate wire transfers?

A. I believe -- well, I know Dennis Blackburn and perhaps Cathy Bramnick also. But, like I say, I'm not sure of her power in terms of the dollar amount. She perhaps couldn't do anything over a certain amount of money, and then Dennis would have to do it.

Q. How about to hire employees?

A. Cathy was considered the office manager, and did she interview and also hire employees.

Q. And how about contracts with vendors or

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suppliers, that sort of thing?

A. I don't know.

Q. Do you know if there were any Board of Directors meetings?

A. At that time, I don't know that there was a Board of Directors. You're using terms that I don't think that had been thought of yet. The company was too small.

Q. And the lines of authority relatively informal?

A. Yes.

Q. Did Karl Video Corporation or Karl Home Video continue to exist after the acquisition as a separate entity?

A. Not that I know of.

Q. After the acquisition, who had financial authority?

A. Lorimar, ultimately.

Q. How so? Can you describe your understanding of that?

A. Well, my understanding was that Stuart Karl still had the power to sign checks, as did Court Shannon. There was a list of executives who had the power. Typically, though, it had to be two signatures for over x-amount of money, which I don't know how much

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that was. Anything that was in the hundreds of thousands of dollars, I believe, had to come from Lorimar, had to be signed by a Lorimar officer. In other words, it had to go up to Culver City. It couldn't come out of Irvine, where we were located.

Q. Do you know who did that at Lorimar?

A. No.

Q. Do you know if the company's bank accounts changed after the acquisition?

A. Well, they remained the same for a while. But I know that after a few months, or perhaps a year, that it was changed to another bank, which I don't recall what the name of it is, but it was a bank that Lorimar wanted to use. And the Bank of Newport was -- I don't think it was dissolved, but they just drew all the money out of it.

Q. What's your best recollection about when that was?

A. The end of 1985, perhaps the beginning of 1986.

Q. And you said the acquisition was in late 1984?

A. Right.

Q. So for perhaps a year after the acquisition, the same accounts were used?

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A. Yes.

Q. That's your understanding?

A. That is my understanding.

Q. Who had authority hire employees after the acquisition?

A. Well, when you ask that, that depends on if it's management level or if it is clerical staff. Cathy Bramnick still would interview, you know, on the clerical staff level. Anything that went into higher management, then it would be Stuart Karl, Court Shannon, at that time perhaps Harold Weitzberg. Any of the vice presidents pretty much had the authority, but I think the final approval was Stuart Karl's.

Q. What participation, if any, did you understand Lorimar to have in hiring?

A. I don't understand what their participation was, if any, especially in the beginning, you know, after the acquisition, the first year and a half. I don't know that they had any. It seems the last six months they became very interested and wanted -- there had to be some kind of approval, it seemed. But the first year, year and a half, it seemed that Stuart, Court and Harold all could still pretty much do what they wanted and hire who they wanted.

Q. And did that apply also to contracts?

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MR. BERNSTEIN: Off the record.

(Off the record discussion.)

BY MR. BERNSTEIN:

Q. Ms. Middel, were there other accounts that Stuart Karl used after the acquisition?

A. Yes. After the acquisition, he opened two accounts at the Bank of America in Fashion Island, Newport Beach. It's private banking.

Q. I'm sorry. By "private," do you mean --

A. It is specifically for, as I understand it, customers who have a million dollars or more to put into their account, something like that.

And then he did open some CD's, Certificates of Deposit, in several different savings institutions which I'm not sure if I can recall them all. He only had them for a few months at a time, and then he would ultimately just take the money out and put it into his checking account because he needed it.

Q. What responsibility, then, did you have over those accounts and the CD's?

A. Well, I opened them for him. I physically went to the bank. He never went to any of these banks. I went there for him, opened it for him. I had some type of signature power on them, although I don't believe I could have drawn it out without a letter from

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him. But he never appeared at the bank to put them in or take them out. I did it all.

Q. Did you have authority to write checks on the Bank of America account?

A. On one account only. On his large account that he put the majority of his money into, he was the only person who could sign.

Q. I'm sorry. There was more than one account at the Bank of America?

A. There was two accounts, two checking accounts. I don't recall the specific term. There was a regular checking, and then there's, like, a Maximizer where you're only supposed to write three checks a month type of checking.

Q. And you had authority over the ordinary checking account?

A. Right. This account started with a balance of $5,000, and it was a regular checking account. The other account started with a balance of approximately a million dollars.

Q. Did you make deposits into both accounts for Mr. Karl?

A. Yes.

Q. And do you know the sources of the funds that went into those accounts?

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A. They were his payroll checks, his royalty checks from videocassettes, his CD interest checks, his expense reimbursement checks. He had an oil well at one time that he got some type of royalty check from. Basically, that's -- I could be missing something, but those were typically the types of checks that would go in there.

Q. And he opened those accounts upon the acquisition, the Bank of America accounts?

A. Yes.

Q. And you also said that sometime later he opened a personal account at Western Empire?

A. Yes. He had kept the First Interstate Bank, and I continued to write all of his personal bills out of there. And then I finally talked him into changing that account, since it was so far to drive all the way down to Corona Del Mar to make deposits when we had a nice bank right across the street, so therefore he switched.

Q. And what different uses, if any, did he make of the Western Empire account as opposed to the Bank of America account?

A. Well, the $5,000 checking account which I could sign on, he never activated it -- or not never, but he did not use it for a year or more. It just sim-

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ply sat there. The Western Empire account became the one where I wrote all the bills out of. It went to pay for all of his things. The large account at the Bank of America he would use himself to write checks for whatever he wanted to write checks for. You know, if he gave somebody money, if he wanted to pay for something very expensive.

Q. Did you keep the books of that account?

A. Well, I didn't at first. He did for the longest time, for about almost a year, I'd say, and then he couldn't figure out what he'd done. You know, he forgot to write checks in and this and that. So he gave it to me and said, "Here, please start taking care of this; straighten it out."

Q. And when was that? I'm sorry.

A. It was about the end of 1985, beginning of 1986.

Q. So after that period, you reviewed the statements and balanced the account?

A. Right.

Q. Could I ask you, the Western Empire account, statements and checks from that, were those documents that were previously in your possession?

A. No. Oh, excuse me.

MR. BERNSTEIN: Off the record for a

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second.

(Discussion off the record.)

BY MR. BERNSTEIN:

Q. Did you at any time have possession of the canceled checks and statements from the Western Empire account?

A. Yes.

Q. And what happened to them, to your knowledge?

A. To my knowledge, Stuart Karl has them.

Q. Ms. Middel, at this time, what I'd like to do is to read to you a list of individuals. You mentioned a number of individuals already associated with the company and hopefully I'll avoid duplication, if I can. And I would ask that, as to each of these individuals, you relate your best recollection of what their involvement in the company was and their relationship with the company.

Neal Baseman.

A. He is an attorney.

Q. Do you know what his title was, if anything?

A. I don't remember his title. I know that he is a lawyer. Perhaps it was Vice President of Business Affairs, you know, something like that. But I

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really don't recall.

Q. He was an executive?

A. Yes.

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Q. And Janice Benlein?

A. She was a secretary to Court Shannon.

Q. I would also ask you as to these individuals, if you recall that they served in more than one capacity in the time they were associated with the company, please relate that, as well.

A. Okay. Well, Jan was moved to another position as a secretary working in another department, which I don't recall.

Q. So for a time she was --

A. She started as Court's secretary, and then after a few months was moved and was a secretary in another department.

Q. How about Robert Bonham?

A. He was in Sales. I don't remember what his title was.

Q. And Steven Bornstein?

A. Yes. He was Vice President of Acquisitions.

Q. Was he someone who had come to the company after the acquisition?

A. He was there during it. I remember he

was there right at the time it was happening, although he was only working, as I understand it, as a temporary person and he wasn't going to be staying on. But then they recruited him to stay.

Q. How about Elizabeth Boughman? That's spelled B-o-u-g-h-m-a-n.

A. Right. She was a secretary to Stuart Karl before me, and then she became -- no, I can't remember. She had another position after that.

Q. In the company?

A. In the company. And then she moved to being the head of the computers that we began to get. In 1986, everyone started getting computer, and she organized it all. I don't know what her exact title was, but she was -- that is what she did.

Q. Okay. How about Kevin Burke?

A. Kevin was the Manager of Duplication and Editing.

Q. And for what period?

A. Kevin worked before I was there. He's, like, one of the original Karl Video Corporation employees. And he stayed on until sometime in 1986, when he was -- I'm not sure if he was terminated or he terminated himself, because they kind of squeezed him out of his position.

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Q. And that was sometime in '86?

A. Sometime in -- It could have been early '87.

Q. And Linda Cacia?

A. Linda Cacia. She was originally the receptionist for Karl Video Corporation, and the she became Court Shannon's secretary and then Court Shannon's assistant.

Q. And Anthony J. Douglas?

A. He was hired to be the Product Manager for the line of Playboy videos.

Q. When was that?

A. Sometime in '86, I believe.

Q. You don't know where he came from?

A. He was a friend of Stuart's.

Q. How about Catherine Downing?

A. She was hired as the office manager.

Q. When was that, if you remember?

A. Sometime when we first moved into our building, so it's, you know, May, June --

Q. You mean the new building, Irvine?

A. Our new building, yes. May or June of '85.

Q. So who supervised her?

A. Stuart and Court.

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Q. And Gary Hunt?

A. He came on as the Vice President of Sales when Harold Weitzberg was terminated, which was sometime in '86.

Q. And Joy Jones?

A. She was never an employee.

Q. Did she have some involvement in the company or with Stuart Karl?

A. She was a friend of Stuart's.

Q. And Abraham Kantabedian?

A. Yeah. Abraham worked there before me and continued to work up through around 1985. And he was an associate producer on some videos. His name is listed on the box. He was Stuart's -- also, an assistant. He did a lot of personal things for Stuart.

Q. Did you supervise him?

A. Yeah, I'd say informally I was his -- you know, I kept track of him and made sure he was doing the things that Stuart wanted him to do.

Q. What was his relationship with Mr. Herrera who you mentioned earlier in terms of their duties and maybe time frame?

A. Well, Mr. Herrera replaced Abraham Kantzabedian.

Q. What sort of duties did they fulfill?

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A. They would go to the bank and make deposits when I didn't have time perhaps, go get cash for Stuart, do laundry, drycleaning, drop it off, pick it up, go -- just do any kind of personal errands for Stuart. Sometimes they were business related; a lot of times they were not, they were just simply personal errands.

Q. Did they handle his finances?

A. No.

Q. How about Pierre Loubet?

A. He was in Sales, and he was -- as I understand it, he was specifically responsible for selling the original Jane Fonda videotape.

Q. Was a longtimer?

A. Yes. He was hired just a few months before I started, and he was one of the originals.

Q. And John Joseph Lutgens?

A. He was the controller of the -- Well, I'm not sure what his title was. He was the head of Accounting.

Q. For what period?

A. From the time of acquisition, and maybe a little bit before that, but right around the time of acquisition is when I remember him coming in. And he was there when I left.

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Q. And he was the controller, you thought?

A. Head of Accounting. I'm not sure if they ever called him controller.

Q. And Cathy Bramnick?

A. Well, she was the office manager at the time I was hired, although I was hired by Dennis Bramnick and Stuart Karl. I never interviewed with Cathy.

Q. What were her duties, did you understand?

A. She did payroll. She kept the personnel files. She had control of the -- and reconciled the company checking account. She kept company files.

Q. Did she do the bookkeeping?

A. Yes.

Q. And when Mr. Lutgens came on, did Mr. Lutgens supervise Ms. Bramnick?

A. Yes. I'd say that when Dennis Bramnick was let --

Q. Dennis Blackburn?

A. Dennis Blackburn --

Q. Yes.

A. -- was let go, John Lutgens came in and filled that and became Cathy's boss.

Q. And Nick Norton?

A. Nick was a product manager, also, I believe, for the Jane Fonda video.

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Q. For what period?

A. I'm not sure.

Q. When you say "product manager," what does that mean?

A. Well, we had product managers for each line of videos. There was one for Playboy, there was one for the Jane Fonda, all of them, you know, all the Playboy, one for original home movies. They would just develop the box cover, develop what was written on it, develop all of the kind of marketing tools they thought would help, you know, sell. Perhaps if a new Playboy video was coming out, they would make sure that that Playmate that happened to be on that box, that she had a tour, you know, a little tour of the United States where it would be promoted in the video stores. He would organize that.

Q. Was he an executive or --

A. Well, kind of middle management, I'd say.

Q. How about Eileen O'Malley?

A. When I was hired, she was already gone. But she was in Sales.

Q. And Kelly Ramsey?

A. Kelly worked in -- you know, I'm not really sure if he ever had a title. He seemed to be in the Duplicating/Editing area and would help with a lot of

technical type of things and did a lot of personal things for Stuart.

Q. Do you know when he was employed?

A. I'm not sure. See, I'm really not sure he was ever on payroll, if he was hired as an outside person. I'm not really sure.

Q. I see. Did the company have a lot of independent contractors?

A. I wouldn't know that specifically.

Q. How about Michael D. Ray?

A. He was a friend of Stuart's that owns J. Ray Construction in Orange County, and he's politically involved.

Q. As far as you know, he didn't have a financial relationship with the company?

A. As far as I know, no.

Q. How about Steve Rivers?

A. He is an attorney with Jane Fonda.

Q. Was he an employee at any time, to your knowledge?

A. He got a consultation fee. I know that, because he would send it to me directly and then I'd send it down to Accounting.

Q. When you say "consultation fee," is that in the nature of an independent contractor consultant?

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A. Yeah. I'm not sure what kind of a set-up they had, but he would send every month for outside services rendered and -- you know, I'm really not sure all the different things he did. But Karl-Lorimar would pay him.

Q. Did the bills break down what he did?

A. I don't think they were very specific. I really don't remember.

Q. Do you remember when that was?

A. Definitely in 1986 and '87, you know, the last three months of '87 that we were there, January, February and March. I couldn't say when it started, though.

Q. You think it was mostly beginning sometime in '86, though, his association?

A. Yes.

Q. Michael Severy?

A. He was hired sometime in '86, and he helped arrange Stuart's travel.

Q. I'm sorry. What do you mean?

A. Well, he would order the private jets and helicopters and just arrange all of Stuart's travel needs, and a lot of times the company's travel needs, especially when it was a charter situation.

Q. Do you know who supervised him?

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A. Stuart.

Q. No one else?

A. Not that I'm aware of.

Q. George Unwin?

A. He was a friend of Stuart's.

Q. He was not an employee of the firm?

A. Well, he had several companies, which I don't know if I can recall all the names, but the last name of the company was VIDSTAR Entertainment. That was a production company, and they produced under that name and Vision Press and there is some other name, Rewind Productions, I think, was the first one. They produced some videos for Karl-Lorimar Home Video.

Q. Can I read to you the names of the four individuals you gave me earlier who you said you had supervised, the secretaries and receptionists. You said Linda Kinwald, Kathy Walker, Karen Stewart, Robynne Phillipsen?

A. Yes.

Q. And they were secretaries for Mr. Karl?

A. They were all secretaries, except Robynne was the receptionist.

Q. And did they have different duties?

A. Linda worked the closest with me with special projects I would do for Stuart, business proj-

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ects. Karen and Kathy were -- strictly kept his business appointment book and typed his business memos and letters.

Q. Who, if anyone, took phone messages for Stuart Karl?

A. Well, we all took phone messages, but they came to Robynne Phillipsen first. That's the receptionist.

Q. Are there any other -- Now, I understand you to have said that the number of employees sometime after the acquisition was more than a hundred or two hundred, and I'm not going to ask you to try to recall of their names. Are there any executives or managers whose names you can recall that you haven't already mentioned to me or that I haven't listed?

A. The only one I can think of E-J Oshins. I don't know if you said her name or not.

Q. And what was she?

A. She was the Vice President of Development in the beginning and then Vice President of Production towards, you know, '86 and '87.

Q. Can you tell me, were all the employees of Karl-Lorimar Home Video housed in one place?

A. You mean, were we all at the same office location?

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Q. Yes.

A. When we moved to Irvine, we were all in the same building. Then we grew so quickly that they got another building around the corner in the same basic industrial complex, but it was around the corner. And they moved some of the people there. Then it got to be some of them were in L.A., you know, in Culver City at Lorimar Telepictures.

Q. Do you know who would have been -- who was at Culver City?

A. Well, E-J Oshins. Probably E-J's the only one that was never really in Irvine. She probably always was in L.A. In the beginning, E-J worked out of her apartment in L.A. She never came to Newport Beach, either.

Then, as employees were hired, like Neal Baseman, for example, he was first in L.A., then he came to Irvine, then he moved back to L.A. So, you know, it's hard to recall specifically.

Q. I omitted to ask you earlier, Ms. Middel, after the acquisition, did the manner in which Stuart Karl used the American Express card and the way in which those bills were paid change at all?

A. Not really. It was -- It stayed the same right up to the end. I mean, he would still use his

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American Express, and I would separate out the business ones and turn them in for reimbursement.

Q. What were Mr. Karl's responsibilities at both Karl Home Video and then later after the acquisition?

A. Can you repeat that, please.

Q. What did Mr. Karl do both before and after the acquisition?

A. Well, that's a really general question. He's president of company. He remained president of the company. He oversaw every department, you know, from Production to, you know, the Marketing/Sales, oversaw all departments.

Q. Was he very much involved in the details of the business?

A. Yeah, I'd say he was, on a whole. As we got larger and larger, obviously he had to delegate these responsibilities and he delegated mostly to Court Shannon.

Q. Did he meet with executives or personnel at the parent, at Lorimar, after the acquisition?

A. He would go there, definitely, probably at least once a week to have meetings up there.

Q. Do you know who he dealt with there?

A. Oh, he dealt with a lot of different peo-

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ple. Russell Goldsmith, who's no longer there. Merv Adelson, of course. Lee Rich, who's no longer there.

Q. Who are these people?

A. They're all -- Merv Adelson owns Lorimar Telepictures. He is the Chairman of the Board or whatever. You know, I really don't know exactly what his title is, but he is the number one. Lee Rich was number two.

Q. What sort of relationship did you understand Mr. Karl to have with those two individuals?

A. He didn't really talk about it too much with me. I mean, I think he was in awe of them, and I think he never knew exactly how he stood with them.

Q. Is there anyone else you can think of that he dealt with there on a regular basis?

A. Tony Young, who is the Chief Financial Officer, I understand, who also is no longer there.

Q. Anyone else?

A. Jerry Gottlieb, who was a person that I would have to, in the last few months I was there, I would have to call and make sure -- get approval for Stuart's travel plans. I would have to get an approval for the hotel room and things like that. And I would turn in his reimbursements to be checked by Jerry's office.

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Q. Is there anyone else you can think of?

A. There are a lot of them, but I can't remember.

Q. That he dealt with on a regular basis.

A. Yeah. I mean, these people called every day, you know, from different departments and things. But those are the major people that I can think of right now.

Q. But they at least kept close track of the different projects that Karl-Lorimar was involved in?

A. I don't know.

Q. But they called Karl a lot, at any event?

A. They didn't -- yeah. They didn't call him a lot, I'd say, but, you know, they definitely were in touch and there were meetings. I talked to the secretaries more than anything, you know, scheduled meetings, canceled meetings, rescheduled meetings.

Q. Frequent meetings?

A. Frequent meetings, frequent cancellations, frequent rescheduling.

Q. Let's go on to another area, which may wake people up a little bit.

MR. BERNSTEIN: Off the record.

(Whereupon, a brief recess was taken.)

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MR. BERNSTEIN: Back on the record.

BY MR. BERNSTEIN:

Q. Ms. Middel, in another area, please tell us if Mr. Karl discussed his political activities with you.

A. In the sense that if there were -- if there was something that I needed to know about specifically because he needed me to do something, he would let me know. Otherwise, he just didn't discuss politics with me.

Q. Well, do you hae a recollection about how he first became involved in political activity?

A. No. I'm not positive, but I understand -- and this is before my employment -- that through his politics is how he went to a party, was able to approach Jane Fonda originally for the video, at a Tom Hayden fundraiser. That's the story that circulates.

Q. But you don't know when he first became involved?

A. I don't know.

Q. Did he instruct you about political activities that he wanted you to undertake on his behalf?

A. You'd have to be more specific.

Q. Well, it's intended as a general question. Tell me about the political activities

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you undertook at the instruction of Mr. Karl.

A. Okay. Well, after a few months of employment, he instructed me that I was going to be, for him, writing checks from his checkbook to pay for some of Senator Gary Hart's campaign costs. He told me that someone would be calling me, giving me a list of names and amounts and addresses and that I should write them down and that it was okay, that he was going to pay some of Hart's debts.

And he offered no other explanation.

Q. When was that?

A. It was around June -- May/June of '84.

Q. And what happened then?

A. Well, then indeed someone called, and I'm not sure if it was one person or maybe two -- I'm not real sure. But, nevertheless, I did receive by phone call names, amounts and addresses to write checks.

Q. Who called you from the Hart campaign?

A. I don't know.

Q. Did they identify themselves to you?

A. I can't remember.

Q. And what did you do then?

A. I wrote down everything. I showed it again to Stuart because it seemed -- not that I was knowledgeable at that point about whether this was legal

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or not, but I just -- it was a lot of money. And I showed it to Stuart and said, "Okay? Is this what you want?" And he said, "Yeah, go ahead. Write the checks. Give them what they want."

Q. How much money was involved?

A. Well, the checks, those actual checks totaled around $16,000, I believe. Then there was a wire transfer, or possibly two or three -- I don't remember.

Q. Was that in the same time period?

A. Yes, probably in the same week.

Q. You said that you wrote down the information that was conveyed to you and you showd it to Mr. Karl?

A. Yes.

Q. And he approved it?

A. Yes.

Q. And did you keep a copy of that list?

A. Only for the purposes of -- you know, to write it.

Q. Do you know what happened to the list?

A. Oh, I have no idea.

Q. So you signed the checks and put them -- did you send them in the mail or deliver them? How did they get to their destination?

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A. Yeah, I'm sure they were mailed because I remember writing down addresses to mail them.

Q. And to what individuals or entities were the checks made out?

A. Well, I don't remember, but it's, you know, obviously in these newspaper articles and things. But they were all vendors. Most of them were located in the San Francisco area where the Democratic Convention was that summer.

Q. Tell me how the wire transfers arose.

A. Well, a gentleman that I specifically remember -- it was a man -- called. I don't know who he was or, you know, what his position was. But he called and he was very demanding, asking for a specific amount of money. It was thousands of dollars, but I don't remember how much it was. I said, "Well, you know, I can write a check," because I had been writing these checks. He was -- "No, it must be wired today. It must be wired before, you know, this afternoon. We have to have it."

So I went to Stuart and said, "Gee, he wants it wired. You don't have that much money in your account." He said, "Well" -- Stuart said, "Have it wired from the company account."

So I therefore went down and gave the

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information to Cathy Bramnick and told her, "Stuart wants you to do this. Please do it."

Q. Who was the money transferred to?

A. I don't remember. It was transferred -- The only thing I can remember, it was transferred to a major bank in New York City.

Q. What information were you given about how to carry out the transaction?

A. Well, the name, the account number.

Q. The account number for it be transferred to?

A. Right.

Q. And the name?

A. And the name.

Q. Do yu remember, was it a business, an individual?

A. It was an individual, I'm pretty sure.

Q. I thought you said earlier you said the wire transfer was in the neighborhood of one or two thousand dollars.

Q. I don't remember. It was several thousand dollars.

Q. Several thousand?

A. Yeah. And I'm saying that based on the fact that I know it was a large amount, number one;

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and, number two, it was more than Stuart had in his account. And he typically had a few thousand dollar balance, but, you know, if it was ten or fifteen thousand, well, he typically -- when you do a wire transfer, it takes it right out. If you don't have that balance, you can't do it.

Q. Was there more than one wire transfer?

A. I don't recall. There could have been.

Q. The one that you recollect that was the several thousands of dollars, did that take place before or after you wrote the checks that you put in the mail to the vendors?

A. I believe it was after because I tried to tell the man, "Can I write a check," because, you know, to me, it was, like, okay, I've been writing these checks; why can't I write this guy a check? But he wouldn't -- you know, he demanded it had to be a wire transfer.

Q. Who was this individual?

A. I don't know.

Q. Did he identify with what organization he was connected?

A. I don't remember.

Q. Did you have an impression that he was connected with the campaign?

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A. Yes.

Q. And not connected with the individual to whom the money was wired?

A. I don't know. I definitely knew at the time that he was connected with the Hart campaign. You know, I'm not sure how or why, but they were all connected. But I don't know who he was or what his name was.

Q. Did he give his name? Are you saying you don't remember his name, but --

A. I don't -- It's too long ago for me to remember, really, what he said.

Q. But somehow you knew that he was from the Hart campaign?

A. Yes.

Q. Do you know what account the money was wired from?

A. I didn't do it myself, but I understand it was wired from the Karl Video Bank of Newport account.

Q. Do you know where Stuart Karl got the idea to write the checks for the expenses?

A. No, I don't.

Q. What other activities did you undertake at his request, other political activities?

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A. (No response.)

Q. Let me ask you a more direct question to make it a bit easier.

Did he ever ask you to contribute to a federal candidate?

A. Yes.

Q. And how many such contributions?

A. Well, I don't remember how many, you know, that he asked me to do. But I did several. He asked me, you know, many times.

Q. And did he reimburse you for these contributions?

A. Yes.

Q. At this time, let me hand you what is FEC Exhibit 3, and it's a copy of the checks, Ms. Middel, that you submitted to us, copies of the checks.

And what I'd like you to do, if you can, is, in order that you like, to discuss how the contributions these checks reflect arose and the circumstances of the reimbursements.

A. On each one?

Q. Yes, if you could, please.

A. Okay.

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(The document referred to was marked Federal Election Commission's Exhibit No. 3 for identification.)

THE WITNESS: The first one is dated July 12th, 1984 to Americans With Hart, for $200. This one was written right before the Democratic Convention, and it was obviously -- you know, he asked me to contribute for that purpose. And I was reimbursed.

BY MR. BERNSTEIN:

Q. Was it in connection with a fundraiser?

A. No, not that I remember. I don't remember going to any fundraiser at this time.

Q. And how did the reimbursement take place?

A. He would have me go to the bank and write a check to cash, get cash and reimburse it.

Q. From what account?

A. At that time, it would have been First Interstate Bank.

Q. That was Karl's personal account that you could write checks on?

A. Yes.

Q. Do you remember how soon after you wrote the check you would have taken the money out of Karl's account to reimburse yourself?

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A. Oh, it would have been the same day or the next day, within a couple days.

Q. Okay. Please go on.

A. Okay. The next check was written December 18th, 1984, Americans With Hart, for $50. That probably was for a dinner. I did attend a dinner, the Democratic -- some kind of fundraiser. But by then, Hart was not, obviously, the candidate. But I would have also been reimbursed for that.

Q. Was this a debt-reduction fundraiser?

A. Yeah, I'm sure it was. Well, no, I don't know. You know, the only thing I can remember going to was some dinner in Los Angeles at the Beverly Wilshire, and everybody was there. Mondale, Ferraro, Gary Hart, and they all gave speeches. But Hart was out of the running.

Q. Was that after the general election?

A. Oh, yeah. It was in November or December, right when this check was written.

Q. And, again, how did the reimbursement take place?

A. Same way: go get cash from the bank.

Q. Did he instruct you to do that?

A. Oh, sure, because it wasn't just me, of course.

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Well, let us go through your contributions first, and I'll ask you more questions about who else was involved.

A. Okay. This next one is written October 30th, 1986, Committee for -- it says Tom Wirth, but his name is really Tim Wirth. And I surprised myself when I found this one. I don't remember it at all. He obviously asked me and I did it, and I don't even know who this guy is. It's stamped on the back, you know, "Denver, Colorado," I believe, which, you know, kind of makes me wonder if the guy had anything to do with Gary Hart. But I don't remember.

Q. You don't remember making the contribution?

A. I don't.

Q. Do you remember if you were reimbursed for it?

A. Oh, I definitely was reimbursed for a thousand dollars.

Q. How do you know?

A. I don't have a thousand dollars to give to somebody I don't know.

Q. So let me understand. Do you assume that you were reimbursed because that's what you had carried out in the past before this --

A. Right.

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Q. -- and that you would not have made a thousand dollar contribution on your own without being reimbursed?

A. Right.

Q. Go on.

A. This one is dated May 27th, 1986, Carter For Congress, for $500. This is to David O. Carter, who is an Orange County judge, I believe. Again, Stuart was taking up a collection for this judge and asked me to write a check, for which I was reimbursed.

Q. And the same -- you went to the bank?

A. Either myself, or it could have been Eddie Herrera who actually went to the bank and got cash at this particular date.

Q. Did Mr. Herrera have authority to withdraw money from the account?

A. Well, I could write him a check to cash, and he could go cash it. And the bank knew who he was.

Q. And do you remember how soon after this you would have been reimbursed, if you were reimbursed?

A. This one was maybe three or four days.

Q. Was this in connection with a fundraiser?

A. There was no fundraiser for him that I'm aware of that had anything to do with Stuart Karl.

Q. In each of these instances, Ms. Middel,

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did Karl say to you when he asked you to make the contribution that you would be reimbursed?

A. Yes.

Q. And is that something you then undertook to do yourself afterward?

A. I had to reimburse myself and everybody else because they would hound me for the money, literally.

Q. Please go on.

A. Okay. This is written November 6th, 1984, Bradford For Congress, $250. I remember a Carol Ann Bradford that was running for Congress, and she had an office in Newport Beach. Obviously, Stuart asked me to contribute to her campaign, also.

Q. Was this in connection with a fundraiser for her?

A. I remember no fundraiser for her.

Q. And were you reimbursed for this contribution?

A. Yes.

Q. Go on.

A. This one's January 26th, 1984, Friends of Gary Hart, $250. Now, this one is the first one, I'm sure, the very first one. I'd only been working for Stuart for a couple of months here. And Gary Hart

was throwing his hat into the presidential ring there, and that's what this was for.

Q. Was this in connection with a fundraising event?

A. No.

Q. If you said this was the first one, was this, then, the first instance where -- Let me ask the direct question. Were you reimbursed for this contribution?

A. Yes.

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Q. And if this was the first contribution that you were reimbursed, do you recall any discussions that you had or statements that Mr. Karl made about his intention to carry out the reimbursement?

A. Yeah. I mean, the -- yes, the very first time, I specifically remember him saying, "Well," you know, "we're going to raise the money for Gary Hart, and this is how we'll do it. We'll collect checks from people, and then I'll just reimburse them with cash." And he asked me, you know, to help solicit this around the office.

He did ask some of the executives himself, I believe, because I think he knew I would feel uncomfortable -- it's kind of a strange request, and he probably understood I didn't, you know, understand what

it was all about that much. So he had me ask some of the secretaries perhaps, and he would talk to the executives.

But, you know, he explained, "Have them write a check and tell them don't worry, I'll give them cash."

Q. Do you know where Mr. Karl got the idea from to carry out the reimbursements?

A. I have no idea. I at that time assumed that he made it up, and I never knew that anyone told him to do it.

Q. Did he often initiate things -- ideas of his own without direction from someone else or without an idea from someone else?

A. Oh, definitely. He's an entrepreneur, all the way.

Q. You earlier alluded to -- and I'd like to now get into the question of who else, if anyone, was solicited for contributions and reimbursed.

Did he offer to reimburse anyone else, to your knowledge?

A. Yes, other employees. They were always employees, basically, outside of perhaps George Unwin, maybe, as one.

Q. These were the executives or non --

A. Non-employees.

Q. Non-employees.

A. Offhand, I think George -- George Unwin is the only one I can think of that was not a new employee that he -- I know he reimbursed, because George doesn't have any money.

Q. How about spouses?

A. Oh, no, I don't think so. I don't think that they -- they were not aware, his spouse or anybody else's spouse. I don't believe that they were aware of this unless the husband would tell them. I don't think so.

Q. You said that you thought Mr. Karl solicited from some executives and that you solicited contributions from other employees?

A. The first time, yes. Later on, I did it all. You know, I did it for him under his direction.

Q. Well, as to this first one, can you try to -- can you tell us what happened, what you did?

A. Well, I went, you know, to an employee and said, "Listen, Stuart wants to raise money for Gary Hart, and he'd like us to write a check. Make it out to Americans With Hart and make it for" -- and Stuart would tell me how much to ask them for. He would give

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amounts, "Ask this person for that amount," you know. If they were a secretary, they didn't give us much. If they were an executive, they gave more. And then, "I will be reimbursing you in cash from him so that he can raise the money."

MR. BERNSTEIN: Off the record for a second.

(Discussion off the record.)

BY MR. BERNSTEIN:

Q. Please go on.

A. So I would tell them, "If you write a check, I will reimburse you in cash from Stuart," and they all agreed.

Q. Who did you approach?

A. Okay. I don't remember specifically each different time, but I probably could recognize the names if I saw a list that I understand's on file with the State or with the United States, whatever. And pretty much, it includes the employees.

Q. Did Mr. Karl give you a list of employees that you were to approach?

A. He would verbally say things. He never wrote things down very much, but he verbally would say something and I'd write it down.

Q. What did you then do? You collected the

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contributions from these individuals?

A. I collected the checks. I don't remember what I did with the checks, though, specifically. Probably they were mailed to someone. They were probably Federal Expressed, rather, to, you know, someone in L.A. or Denver, someone with the Hart campaign. But, you know, it's too long ago for me to really remember that specifically.

Q. Did you mail them or did somebody else mail them?

A. Well, I would have done it, but I don't remember, you know. I don't think anyone -- as opposed to I don't think anyone came to the office to pick them up. I don't think so.

Q. What happened then?

A. And then I would go to the bank and get the cash and reimbuse the people.

Q. Well, as to this first one, did you go to the bank right away?

A. This is over four years ago. I don't remember.

Q. Well, I'm asking for, at least as to the first one, since presumably this was a somewhat novel thing, what your best recollection is of --

A. I'm sure I went within one to two days,

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because I'm sure everybody was, as myself, a little nervous about having to write a check for that amount out of their personal checking account and getting the money back.

Q. And you withdrew cash?

A. Uh-huh. I'd write a check to cash, and I'd add up -- if I asked, you know, eight people, I'd add up the amount and I'd write it for that amount.

Q. So you made a list of the people that you had solicited?

A. Yeah.

Q. Do you know what happened to that list, the list you used when you went to the bank?

A. It would be thrown away. I would typically take an envelope and write the name and the amount on that envelope, add it up, go get the cash, put the cash in the envelope, and then go around and distribute it, tear up the envelope and throw it away. That was it.

Q. And this, again, was on Stuart Karl's personal account?

A. Yes. Now, it is possible that -- it is possible, because it was so long ago, that he could have taken a check from the company, definitely before Lorimar, though, and used a company check, maybe one

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time. It's possible. But mostly --

Q. Do you have reason to think that, or --

A. Well, the only thing is, if he was low on money one day and didn't have it, it was nothing for Stuart to just say, "Give me a company check." You know, he just didn't think anything of it. "Give me a company check to cash for a couple thousand."

Q. Well, if he asked that, is that something you would have done?

A. Or Cathy would have written it up, Dennis would have signed it, you know, and I would have deposited it and/or gotten cash from it.

MR. BERNSTEIN: Off the record for a second.

(Discussion off the record.)

BY MR. BERNSTEIN:

Q. Ms. Middel, in addition to the contributions that you made that we discussed, do you recall contributions made by Stuart Karl's employees to Townsend Committee in September 1986?

A. Do I remember specifically who contributed?

Q. Do you have a recollection that employees contributed?

A. No, I don't. I don't have any recollec-

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tion of asking anybody for a check for Townsend. I could have, but I don't remember.

Q. To your knowledge, did anyone else other than you and Stuart Karl solicit contributions from the employees?

A. For Townsend?

Q. For anyone.

A. For anyone; oh, yes.

Q. Who else did?

A. Excuse me?

Q. Shall I repeat the question?

A. Yeah.

Q. To your knowledge, besides you and Stuart Karl, did anyone else solicit employees for contributions?

A. Solicit employees? No.

Q. To your knowledge, did anyone else reimburse employees for contributions?

A. No, not to my knowledge.

Q. Was there anyone else who had authority on Stuart Karl's personal checking account besides you and Stuart Karl?

A. No. In the beginning, Elizabeth Boughman did, because she was the prior secretary. But she never exercised that option after a few months that I had

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been employed. And, of course, all the accounts got changed, and she never had power after that.

Q. Ms. Middel, were all the contributions made by Stuart Karl's employees reimbursed?

A. I don't know that every single one of them was reimbursed, no. There were legitimate contributions -- some.

Q. In what instances were contributions not reimbursed?

A. Well --

Q. What I mean is the general question of what distinguished those instances in which contributions were reimbursed from those in which they were not?

A. Well, you're asking -- you know, I can't know all of Stuart's personal business or all of the employees' personal business. If it didn't have to do with him asking me to reimburse someone, how am I supposed to know that? I just -- I happen to know that when there was the Kathleen Kennedy Townsend fundraiser -- and I was out of town at that time, but a friend told me that people gave legitimately and they were not reimbursed.

Q. Can you tell us who related that to you?

A. I don't remember. Well, okay. Linda

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Cacia, who happens to be a good friend, told me that she gave, I believe, forty dollars and that Stuart had asked her to give what she could. And she did, and she was not reimbursed.

Q. Is that -- What other knowledge of the Townsend fundraiser do you have?

A. Not much. I wasn't there for it, so, you know, I just heard that he had a luncheon at his house and employees were invited and basically asked to give what they could afford to give.

Q. Do you recall any instances where you solicited contributions from employees and did not reimburse those employees?

A. I don't -- I don't remember. You know, I'm not sure. I don't think I ever solicited for Stuart and did not reimburse them, although it is possible that perhaps one time he asked me to ask people, you know, for a contribution. It's very possible, though. I mean, mostly it was this situation with the reimbursement, but it is possible that he -- because Stuart hates to ask anybody for money or contributions, so he would have me do these kind of things. It's possible.

Q. Can you, you know, try to recall at all whether that -- if that took place and what particular candidate it related to or --

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A. See, I don't remember.

Q. -- time frame it related to?

A. I don't remember. I mean, I'm thinking, too, not necessarily political. You know, it could have been for anything.

But this was my job, you have to understand, to do these kind of things that he didn't want to do.

Q. The reimbursement of charitable contributions could create other problems, but it isn't a particular concern of ours.

Do you recall anyinstances where employees made contributions requested by either Mr. Karl or yourself and declined to be reimbursed?

A. Declined to be --

Q. Declined to be reimbursed.

A. No, I don't remember anyone declining to be reimbursed.

Q. You mentioned earlier that you thought the reimbursements took place relatively soon after the contributions because the employees hounded you to. Can you elaborate on that?

A. Well, okay. I probably shouldn't have said that word, but once in a while, the people who -- especially maybe $250 or $500 was, like, a major

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hole in their checkbook, they would get a little nervous and ask me a few times a day, you know, when they would be getting reimbursed. I would get phone calls, you know, and have people pop their head in my door and say, "When are we going to get the money?"

Q. Who would have called you and said that?

A. Oh, I don't remember. I don't remember who. I really don't.

Q. Was that a frequent occurrence?

A. No. I think just one time it took about five days for the reimbursement to come for some reason and people were getting a little nervous. In fact, I think the checks -- some of the checks bounced. It might have been Carter, but I don't -- I'm not real sure.

Q. The contribution checks?

A. The contribution checks, yeah. They weren't covered in the checkbook and they were put through, and I think they bounced -- maybe one or two.

fQ. In each instance where you solicited the contribution, did you inform the employees that they would be reimbursed?

A. Yes.

Q. In each instance?

A. In each instance that Stuart asked me

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to solicit?

Q. Yes.

A. Yes.

Q. My question is, did there come a time, with the repeated -- you know, the repetition of this practice, that the employees assumed they would be reimbursed?

A. I think they knew that they were going to be reimbursed, but they still wanted to hear the words, that they were going to be reimbursed, because it was a large amount of money.

Q. All right. So your practice was then to say that at every solicitation, every time you --

A. Yes, definitely. Definitely. If I didn't say it, they'd say, "And you're going to give me the money; right?" You know, I mean, it was very understood.

Q. Did you ever discuss the propriety of this practice with Mr. Karl or with anyone else?

A. No.

Q. Not with other employees?

A. Well, I suppose with my best friend, Linda. We probably talked about it a couple times, that we didn't like it. But we didn't -- we were afraid for our jobs, and we didn't -- you know, we didn't know

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what to do. Everybody else was going along with it, and who were we? We were just secretaries.

Q. You had said -- I'm trying to establish the contributions that you made or that others made that were in connection with the fundraising events that were simple solicitations apart from those events. And you had said that your recollection is there was no fundraising event in connection with the Carter contribution.

A. Right.

Q. That was in May of '86.

A. Right.

Q. And I think you also said that you were uninvolved in the Townsend contributions in September of '86; is that right?

A. Right.

Q. Do you recall contributions to Senator John Kerry in March of '86?

A. Basically, yes.

Q. What can you recall about that?

A. Well, that it was the situation where I would solicit for the checks and reimburse in cash. I'm not sure if it was -- you know, there might have been some legitimate checks written in that particular case, but there definitely were some reimbursements

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also.

Q. What distinguished the legitimate ones from the ones that were reimbursed?

A. What do you mean by that? I didn't --

MR. BERNSTEIN: Off the record for a second.

(Discussion off the record.)

BY MR. BERNSTEIN:

Q. What I was trying to ask was what the basis -- what your basis was for the assertion that you thought there were some legitimate contributions and some not. And I wonder if you could answer that now?

A. Right. For example, at the Senator Kerry reception at Stuart's house, there were people there that Stuart had called and invited. There were legitimate contributions. But, yet, there were also the employee -- some of the employee checks, and I know that they were reimbursed by myself. So at that point, you have a combination of legitimate and reimbursed contributions.

Q. So regarding the Kerry fundraiser, do you recall that all of the employee contributions in that fundraiser were reimbursed?

A. No, I don't. Some of them --

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Q. Are you just -- I just want to understand that the practice was that all of the people that you solicited in the company you reimbursed, but your best recollection is that you're not certain this took place as to everyone. Is that why you're hesitant?

A. What I'm trying to say is, like, in the beginning, 1984, when this -- there was only seventeen employees and everybody pretty much was asked, you know. Or maybe most of the people higher up were asked, including secretaries. Then later on, in March of '86, you have 150-plus employees, and only the select people are asked.

Some of these people don't know about 1984. They weren't there. You know, it changed as the company grew. Stuart was selective about who he would ask to contribute and be reimbursed because he said to me a couple of times, "Do you think we can trust that person?" So he's thinking at that time, "I don't want to just ask anybody. This executive, what if he doesn't go along with this? What if he says something to somebody?"

Q. So are you suggesting that as to some of these executives, Mr. Karl might have solicited contributions from and not suggested reimbursement?

A. Right. It's possible. Definitely. There

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are employees that gave legitimately. But there were more reimbursements.

Q. Ms. Middel, what I'd like to do is to give you the names of the individuals and to ask if you recall particular contributions they made and whether or not they were reimbursed.

Do you recall Neal Baseman making any contribution to the Townsend campaign in September of 1986?

A. No, I don't recall that. But that's — like, I said, I was on vacation that week. But I understood that he made a contribution, and to the best of my recollection it was legitimate.

Q. This was based on the conversation you had with Linda Cacia?

A. Well, not based on that. Based on the fact that I keep Stuart's checkbook and there was no cash missing. I mean, it would have been something I would have been involved with.

Q. Well, actually, let's follow that up for a minute.

You did not make a cash withdrawal from his personal account in connection with Townsend contributions to reimburse people; is that what you're saying?

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A. I don't think so. I really -- I could be wrong. Now, I was gone that whole week. I was on vacation. Then I got back, and I really don't remember reimbursing anybody. I think it was all legitimate. It's possible there were a few. I don't think so.

Q. Well, if there were a few, how would it have taken place?

A. When I got back from vacation, Stuart probably would have said, "Well, you owe so-and-so $500 and so-and-so $200," or something like that, you know. And that's possible.

Q. Do you remember a contribution by Janice Benlein to the Carter campaign in May of 1986?

A. Yes, I happen to remember that one.

Q. What can you tell us about that one?

A. Well -- and if I'm remembering the correct one, I'm sure that this was it. It's probably the only time Jan was involved with this reimbursement. But she was the one that -- her check bounced because she didn't get the money back, and that's why I remember her, because she was pretty upset when she came into my office and said the check bounced.

Q. So what happened?

A. Well, I got the money to her after that. For some reason, Stuart was putting me off. I mean,

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I had the power to get the money, but I couldn't do it unless he said, "Okay. Go ahead. Go to the bank. Get the money. Reimburse them." I mean, it was like I'd have to -- "Well, can I do it now? Can I do it? Is it okay today?" And he'd keep putting me off for some reason on this particular one, and pretty soon it was five working days, at least. It could have been even a whole week. And Jan came in and said her check bounced. And then I went in to Stuart and said, "I've got to get this money to these people. Their checks are bouncing." So I -- you know, she got her money and we paid for her bounced check.

Q. Why was he holding off?

A. He didn't have the money for one reason or another. He was always running low.

Q. So did Ms. Benlein write another check?

A. No. The Carter campaign put it through twice, I guess.

Q. Do you remember if Dennis Blackburn made a contribution in February 1984 to the Hart campaign?

A. I don't remember specifically, but probably.

Q. Do you remember roughly how many individuals made contributions and were reimbursed in connection with that early Hart contribution?

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A. Oh, it was probably about eight or ten people, something like that.

Q. Is there some way you can categorize those individuals? Were they executives and the secretaries of Stuart Karl at that time?

A. Well, they were -- you know, the company was pretty small, so it was the heads of the departments and a few of the secretaries, basically. That's about it. But I can't be sure of each, you know, person.

Q. Do you have any reason to think that at that time that Stuart approached individuals inside the company and did not offer reimbursement? I'm sorry. You had described to me that later on there came a time where he was somewhat reticent and careful about who he approached and suggested reimbursement to.

A. Right. I know what you're trying to say.

No. In 1984, no, I don't believe there was any way he would have approached people for money in the office and not offer reimbursement.

Q. Thank you. Do you recall a contribution by Robert Bonham to the Kerry campaign in March of '86?

A. I don't specifically recall it, but I believe he contributed. You know, I would believe he wrote a check.

Q. Do you recall if you reimbursed him for

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that check?

A. No, I don't. I didn't know Rob very well, and I don't -- no, I don't remember doing that.

Q. Do you recall if he made a contribution to Townsend in September?

A. I wasn't there, so I don't know.

Q. Do you remember contributions that were made to the 1988 Hart campaign, Ms. Middel?

A. 1988?

Q. To the 1988 Hart campaign. That would have been in late 1986.

A. Oh, written in '86.

Q. Yes.

A. No, I don't recall. I looked for a check myself, written by myself in 1986, and I couldn't find one although I feel certain I must have. But I can't find it. And I don't know that anybody else, you know, has found one either. Idon't recall. It seems like a probability, a very good possibility, but I don't remember.

Q. Well, do you remember if Steven Bornstein made a contribution in December '86 to the 1988 Hart campaign?

A. I wouldn't recall that specifically.

Q. And do you remember if he made a contribu-

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tion to Townsend?

A. I don't know.

Q. Do you remember a contribution in February 1984 by Elizabeth Boughman to the Hart campaign?

A. No, I don't specifically remember that, that date.

Q. Do you remember if Cathy Bramnick made any contributions?

A. I don't specifically remember. But those last two names you said are a definite probability, but I can't specifically remember.

Q. And how about Linda Cacia? Do you know if she made contributions to Townsend? I think you alluded to that earlier?

A. Yeah, she told me she wrote a forty-dollar check and went to the luncheon and was not reimbursed.

Q. Do you know if Mr. Douglas made a contribution to Townsend?

A. I don't know that he did, but, you know, I would assume he would.

Q. Do you have a recollection of whether Catherine Downing -- whether you ever solicited Catherine Downing for contributions?

A. No, I don't believe I would ever solicit her for a contribution.

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Q. Why are you so definite about that?

A. Because she was known for having a big mouth. She was a person no one trusted, and she wasn't very well-liked.

Q. Do you remember soliciting and/or reimbursing Gary Hunt?

A. I don't recall specifically. It's a possibility, though.

Q. Do you know if Joy Jones made a contribution to Townsend?

A. Joy Jones? No, I don't believe she ever did.

Q. How about Abraham Kantzabedian?

A. To --

Q. Do you recall him making a contribution in February '84 to the Hart campaign?

A. Oh, I'm sure he probably did, but I --

Q. Did you solicit him?

A. Did I? Oh, I doubt it. I'm sure Stuart would have asked him himself. They were together constantly.

Q. Do you remember if Linda Kinwald made a contribution to the Kerry campaign in the March of '86?

A. I can't recall specifically.

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Q. And do you understand whether or not she made a contribution to Townsend in September?

A. I don't know that she did.

Q. And do you remember soliciting or reimbursing Pierre Loubet for a Hart contribution?

A. That's a very good possibility, but I don't remember, you know, specifically.

Q. Well, was he someone that you would have solicited or that Stuart would have solicited?

A. Either one. I knew Pierre pretty well. I could have solicited him myself, you know, easily.

Q. Well, if he indeed made a contribution to Hart in '84, do you think that you reimbursed that contribution?

A. On Pierre? If it was in '84, yeah. Yes. I would say almost anyone that you come up with in January or February of '84 that coincides with my check that was an employee was reimbursed.

Q. Do you have a recollection that all of those individuals were, although you may be uncertain about the later events?

A. Right. I just remember the first time soliciting and paying them all back.

Q. Do you remember Mr. Lutgens making a contribution to the Kerry campaign in March of '86?

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A. I don't specifically remember.

Q. Is he someone that you solicited on at least one occasion?

A. I don't think so, no. I don't think he's the kind of person I would have approached for something like that.

Q. Do you think Mr. Karl --

A. I think Stuart would have, it it happened. If it indeed happened, it would have been something Stuart would have done.

Q. Do you remember ever delivering reimbrusements to him?

A. No, I do not remember ever giving him a reimbursement. I mean, I'm not saying I didn't, but I don't remember doing that with John.

Q. Tell me, you had said that you put cash into envelopes and delivered the envelopes; is that right?

A. U-huh. I'd always personally hand it to them, though, and make sure that -- you know, in an envelope, no one could see what it was.

Q. Is that how you did it on all occasions?

A. Yeah, pretty much. I mean, I'd wrap it up in an envelope. A lot times I put it in individual envelopes wrapped with a piece of paper around it so

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you couldn't see through it, that it was money. But I'd make sure it went right into their hand. I wouldn't lay it on their desk or anything like that.

Q. Did you ever deliver cash in this fashion to employees or other individuals apart from this reimbursement scheme?

A. Can you be a little more definite about that?

Q. I'll ask it again and narrow it just a litle bit.

A. Okay.

Q. Did you ever deliver cash in envelopes like this to employees apart from reimbursement schemes, in any other instances or for any other purposes?

A. I'm trying to think of why I would do that, but I don't think so.

Q. It was not an ordinary practice?

A. No. I see what you're getting at. No, it was not an ordinary practice. He didn't pay back loans that way or anything like that, no. No.

Q. Did he give cash to employees frequently, large amounts of cash?

A. Yeah. As a matter of fact, he would give loans to -- and that's the only time that I would have done that, yes. You know, that's why I had to stop

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and think. He's a very generous man, and sometimes people would need $500, $1,000, and he would loan them the money. And sometimes I would get cash like that and give it to them. But, I mean, it was very -- it was an out of the ordinary kind of a thing. It certainly didn't happen every week or even every month.

Q. If you did that, would you deliver it in the same fashion as you did the reimbursements?

A. If it were cash, definitely, yes. I would make sure it was where no one else could see what it was and what I was doing. Otherwise, there'd be a line outside the door.

Q. Can you estimate the number of occasions that the other might have taken place?

A. Oh, very few times. Less than six, probably.

Q. Do you remember Nick Norton, soliciting Nick Norton or reimbursing him for any contributions?

A. No, I do not specifically remember doing that wit Nick.

Q. Do you recall him taking out a loan to contribute to the Hart campaign?

A. No. I heard that rumor, but I don't know anything about that.

Q. As to E-J Oshins, Ms. Middel, do you re-

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call reimbursing her for a contribution in early 1984 to the Hart campaign?

A. I don't specifically remember, but she probably was reimbursed, yes, at that time.

Q. If her office was not where the rest of the employees were housed, how would you have communicated with her?

A. She came to Newport Beach, where our offices were at that time, once or twice a week. So she would come to the office, and when she came to the office, then I would have the opportunity to reimburse her. That would not have been a problem.

Q. Do you remember doing that?

A. No, I don't specifically remember, although, as I say, I probably did. I feel anything in that time frame was most likely reimbursed.

Q. Do you know if she contributed to the Townsend campaign in December?

A. I don't know.

Q. Do you know anything about a contribution to the 1988 Hart campaign in December of 1986 by E-J Oshins?

A. No, I don't recall.

Q. Do you know anything about a contribution by Robynne Phillipsen to the Townsend campaign in Sep-

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tember?

A. I don't recall.

Q. What about a contribution by Kelly Ramsey to the Townsend campaign?

A. I don't recall.

Q. I think you said that Michael D. Ray was someone who was not employed by the business?

A. Right.

Q. He was a friend?

A. Right.

Q. Did you ever solicit him for contributions?

A. No.

Q. Your understanding is Karl may have solicited him?

A. Yes, I think that he would have called him up and invited him to a fundraiser.

Q. Did you ever reimburse him for contributions?

A. No.

Q. You're certain about that?

A. I am certain. I don't even know what he looks like. I just know I never reimbursed anyone but an employee or, like I said, George Unwin, a good friend that I knew. I didn't reimburse anyone I didn't

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know. I don't even know who he is, except that he's got a company in Irvine.

Q. How about Steve Rivers? Do you remember soliciting him or reimbursing him?

A. No, I don't remember ever soliciting him or reimbursing him.

Q. Do you think you -- did you reimburse him?

A. Do I think I reimbursed him? Is that what you're asking me?

Q. Yes.

A. I don't think I did.

Q. Are you not as certain about that, though?

A. I can't be positive, but I just don't think Steve falls in that category for some reason. I could be wrong.

Q. How about Michael Severy? Do you remember soliciting him?

A. No, I don't remember soliciting Mike.

Q. Again, tell me, how did you decide who to solicit and not to solicit?

A. Stuart told me.

Q. In each instance?

A. Yeah. I mean, it was totally orchestrated by Stuart. He would tell me who to solicit and how

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much to ask for.

Q. Do you remember soliciting Karen Stewart for contributions?

A. No. She probably was solicited and reimbursed, however -- considering her position. But I don't remember specifically doing it.

Q. Do you remember a contribution by her to the Kerry campaign?

A. Not specifically, although I'm sure I remember her being there at the reception.

Q. She did attend the reception?

A. Yes. I remember.

Q. Did everyone from the firm who attended the reception contribute?

A. No. No. Stuart liked to just have a lot of people there. It made it look good. So, you know, it wasn't necessary that they had to give. That's the kind of person he was. You could come even if you couldn't afford to give or even if you weren't solicited by me.

Q. Can you tell me again why you say it's likely that Karen Stewart --

A. Well, because she was his executive secretary at that time, and she sat, you know, right outside of my office. She was -- you know, she was in the

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group. And so it was very likely. You know, it's possible she didn't, but she probably did.

Q. Did you ever talk with her about contributions or reimbursements?

A. I can't remember.

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Q. Did you ever hand her an envelope with cash for reimbursement?

A. Just for her?

Q. Yes.

A. I don't remember.

Q. Is there any way to -- I'm trying to plumb your memory to see --

A. Yeah, I know.

Q. -- if you can --

A. I know. I mean, it's just too much for me to remember. You know, hypnotize me. I'm trying my best, but it happened so many times, I guess. I only remember, you know, my friends and, you know, specific instances like the bounced check, you know.

Q. Well, and obviously you have a better recollection of the first time, as well?

A. Right, right.

Q. I understand that. Do you recall contributions by Court Shannon initially to the Hart campaign in '84?

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Q. Did you reimburse him?

A. I'm pretty sure I did.

Q. Do you know of a contribution by him to Townsend in September of '86?

A. No, I'm not aware of that.

Q. Did you reimbuse him for a Townsend contribution?

A. I'm not aware of reimbursing him for that, no.

Q. Are you aware of a contribution by him in December of '86 to the 1988 Hart campaign?

A. No, I'm not aware of that.

Q. Do you know anything about contributions to the '88 Hart campaign, Ms. Middel?

A. I can't remember. Like I said, I couldn't find any in my checks that I looked through, which I couldn't understand why I couldn't find any. And I don't remember soliciting for it.

It seems like it would have been a likely thing to do, but I don't remember.

Q. And --

A. And I have to specify why I think, because at that time there was so much going on. It was right before we were let go, and there was so much going on, that was minor in comparison.

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Q. I think you said that George Unwin was an individual who was not an employee but was reimbursed; is that right?

A. Well, I'm saying that based on the fact that a list -- I've seen a list of contributions from some point and it showed George Unwin for a large amount. And George doesn't have any money. He would have had to have been reimbursed.

Q. Do you remember a contribution by him in June of '84 to the Hart campaign?

A. I don't remember, but it's likely.

Q. Well, did you deliver cash to him in an envelope, as you did the others, in any instance?

A. I don't remember ever doing that with George. Stuart would have probably done it himself because they went out to lunch all the time. And George wasn't there, but they would go out to lunch and things, or have a cocktail at 4:00. Stuart saw him constantly. Stuart probably would have done it himself.

Q. So do you not recollect reimbursing him at all?

A. I do not recollect reimbursing him. I can only base that on that George doesn't have any money to give.

Q. Well, if Stuart Karl did it, how could

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he have done -- or how would he have done it himself?

A. Oh, he would have just -- he would have just saw George and say, "Hey, I need you to write a check, and I'll give you the money." And George would have said, "No problem. No sweat." They were best friends.

Q. Well, did Mr. Karl ever tell you that?

A. No. He might have said, "Oh, I'm going to hit George up for some money. I'm going to hit him up to write a check." He might have said to me, quite possibly.

Q. Did he say anything to you about reimbursing Mr. Unwin?

A. That went without saying. You have to understand that Stuart Karl supported George Unwin for years, and he may still to this day. George just doesn't have any money.

Q. Do you know anything about a contribution that he made to the Townsend campaign in September of '86?

A. I don't recall.

Q. But you're relatively certain that you never reimbursed him for any contributions?

A. I don't remember ever specifically reimbursing him, no.

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Q. Do you remember a contribution by Harold Weitzberg early in '84 to the Hart campaign?

A. Not specifically, but I'm sure he's probably one of the ones that I asked.

Q. Uh-huh.

A. For Stuart.

Q. How about Kathy Walker?

A. I don't remember with Kathy. Which one would it be?

Q. That's what I'm asking you.

A. Oh, Kathy. I mean, she was a secretary after Karen. She started right when there was the Townsend -- she came to work right the day when I left for my vacation, and then there was the Townsend. So, you know, but I don't remember ever asking Kathy for money or doing the reimbursement with her. It's a possibility, considering her position, though. Anytime you're the secretary, you usually get hit up.

Q. Ms. Middel, to your recollection, did other employees of Stuart Karl contribute to all the candidates that you contributed to?

A. I would say for every check I wrote, there were other employees that wrote to the same thing, definitely, and that were reimbursed, such as myself.

Q. For each one?

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A. For each one. Except Tim Wirth; I can't remember anything about that. That is a total mystery to me. And the thousand dollars is a tremendous amount of money for a secretary to be giving to anybody politically.

Q. Do you have a recollection of any of the contributions you made being isolated instances of Karl soliciting you but nobody else in the company?

A. The only one that I think was like that, as far as I'm concerned, is this one for $50. It was for a dinner. He was -- I can remember him saying to me one time that he was maxed out, which I'm sure you know what that term means, and that he needed to send $50 for the dinner and would I write the check.

Q. That's the isolated transaction you can remember?

A. That's the only time I can remember him asking me for a check and not asking me and everybody else, you know.

Q. In every other instance, your best recollection is that he did --

A. Except for Tim Wirth, who I don't recall at all.

Q. Which you don't have any recollection about?

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A. Uh-uh. It must have been --

Q. A thousand dollars?

A. Yeah, I know. I was shocked, too.

Q. Do you know a Patricia Bonham?

A. Rob Bonham's wife. That's who she is.

Q. Yes?

A. Rob Bonham's wife.

Q. And do you know if she was ever solicited or reimbursed for contributions?

A. No. That would have been strictly -- If there was a husband and wife such as that and the husband's the employee, of course he can give more because he's married. But I don't believe -- and, as I stated before, I don't believe the spouses usually knew that this was going on unless the chose -- and I say "husband" because it was usually men -- unless the husband chose to tell the wife.

Q. To your knowledge, did Karl discuss the reimbursement scheme with anyone outside the company?

A. To my knowledge, no. I don't know anything about it, whether he discussed it with anybody. I have no idea.

MR. BERNSTEIN: Off the record for a minute.

(Discussion off the record.)

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BY MR. BERNSTEIN:

Q. Ms. Middel, do you recall a fundraising reception or contributions raised for a Jerry Patterson, candidate?

A. Jerry Patterson sounds familiar, definitely, but -- do you know what year it was?

Q. In 1984.

A. In '84? That must be why. It sounds familiar, but it's a vague. It's a definite possibility. I recognize the name.

Q. Did you discuss the reimbursement of contributions with anyone outside the firm?

A. No.

Q. Did you have any reason to believe that candidates or employees of the committees involved were aware of the reimbursement?

A. No, I do not believe they were aware of the way Stuart Karl raised money.

Q. What is the basis for that?

A. Well, I guess I don't -- I can't give evidence as to why, but I don't feel that -- I just don't think it's something that Stuart would discuss with these people.

I mean, with Gary Hart, it's different. That's -- Since it all stemmed from Gary Hart, you know,

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I was suspicious that someone within the Gary Hart campaign told Stuart about how to do this.

But as far as these other people go, I don't think they have any idea. You know, Judge Carter and -- I don't think they have any idea the way Stuart did it, because it was a power trip for Stuart. "Oh, I can get you money. I can get you money," you know, like he was magic. It made him important. If he would tell them, he wouldn't seem so powerful.

Q. That would have diminished his --

A. Yeah, his --

Q. (After a pause) You said that you probably forwarded the 1984 Hart contributions somewhere by mail; is that right?

A. Probably by Federal Express.

Q. Do you remember putting any sort of number or identifier on the checks or on the package?

A. No.

Q. No?

A. No.

Q. Did Karl ever discuss with you that cash should be used because no one could trace it?

A. Yes.

Q. When did that take place?

A. The very first time that he asked, I'm

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sure. It was -- I can't recall the specific conversation, you know, dealing with that, but it was always understand that of course it was going to be cash because you can't trace cash.

Q. Did you have an impression that he got that idea from somewhere?

A. Like I say, I don't know. At the time, I believed that he invented it himself. But in light of everything, I don't know. I'm beginning to wonder if someone in the Hart campaign didn't tell him. But I don't know.

Q. Okay. At this point we will --

(Asides)

One more question before we break.

Do the letters of the initials SPKS mean anything to you, Ms. Middel?

A. SPKS?

Q. Yes.

A. No. Are they written a certain way or --

Q. Well --

A. -- grouped together?

Q. Well, if such letters were written on a contribution check, can you infer anything from that?

A. SPKS? No, it doesn't mean a thing to me.

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MR. BERNSTEIN: Okay. We will break for an hour and resume at -- promptly at 2:00 p.m.

Off the record.

(Whereupon, at 1:00 p.m., the deposition was adjourned, to reconvene this same day at 2:00 p.m.)

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AFTERNOON SESSION

MR. BERNSTEIN: We are back on the record.

BY MR. BERNSTEIN:

Q. Ms. Middel, we spent some time talking about contributions that were made to federal candidates that were solicited by you and/or by Stuart Karl and the practice by which yu withdrew cash from his personal account and reimbursed employees.

Can you remember anything about the practice and the activities you engaged in that you haven't yet related?

A. Outside of the checks?

Q. No. At this point, limited to the reimbursement. Are there any other details you can remember that we haven't touched upon?

A. Not really. We've touched on most of it, I'd say.

Q. Do you recall when the last such activity took place?

A. No, I don't remember specifically. I just don't know, you know.

Q. When did you leave Karl-Lorimar, again?

A. March of '87.

Q. Do you have a memory of whether the last time that you had engaged in the reimbursement practice

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was six months before that or a year before that or three months, that sort of thing?

A. I mean, I can look at these checks, copies, and say, "Gee, March of '86 was Senator Kerry."

Q. But one of the later ones was the Townsend in September, which is one that you don't have a recollection about.

A. Right. But I don't believe anybody was reimbursed for that.

Q. There were also checks, not including yours, that were later in the year to Senator Hart's 1988 campaign.

A. Right. That's a possibility, but, as I say, I don't recollect.

Q. You don't have a recollection of that?

A. No.

Q. So, actually, am I right that the clearest recollection you have, the latest one would be the Carter contributions in May of '86?

A. Carter, right. That is the last one I can clearly recollect.

Q. What I'd like to do now is go back briefly to the vendor payments you discussed and the wire transfers, and then on from there to see if we've gotten all the details that you can remember.

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Please tell us again how it was you found out to whom you were to make out these checks and for what amounts?

A. Someone called, I believe, from the Hart campaign -- it could have been more than one person. In other words -- well, first of all, there's two sets of checks, the checks that are written in June -- I believe it's June 5th -- and there are checks that are written in July. So someone called and gave me the names, the amounts and addresses. To the best of my recollection, that is how it happened, you know, with both sets of checks that were written approximately three weeks apart.

Q. Did you expect to receive the phone call or did you call someone?

A. Oh, no, they called me.

Q. And was it a surprise to you when you heard from them?

A. No. Stuart had told me, "Someone's going to call and they're going to give you names and amounts and addresses." And he said, "We're going to pay some Hart bills, basically."

So I wasn't surprised when they called.

Q. And did Stuart tell you who you would expect to hear from?

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A. No, not that I remember.

Q. But he did tell you that someone from the Hart campaign was going to call?

A. I don't remember if he used those exact words, but that is the way I remember it, that someone from the Hart campaign, someone involved with the Hart campaign would call.

Q. Tell me, at that time what employees or advisers or other individuals involved with the Hart campaign had you had some acquaintance with or association with at that point -- to that point?

A. See, that I don't remember very well because those were all brand-new names to me. Everything was brand-new then. There was only person I specifically remember speaking to who was a Hart volunteer, and his name was Keith Glaser. And I remember him because he called often. He called more often than any of the other ones did. And he was in San Francisco. He was one of the workers for the convention.

Q. When did he call?

A. When did he call? Oh, he called during the months of, like, April, May, June, July, you know, leading up to the convention.

Q. Was he the person who related to you who you were to make these checks out to?

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A. I don't know. I don't think so, but, like I say, I can't remember who did. I don't think it was Keith.

Q. What had he calledyou about previously?

A. Oh, he called with information for Stuart about how things were going, you know, for Hart. At one point, there were some rental cars that were rented for the campaign workers, and I'm pretty sure it was Keith who called and he was the one that I discussed this with. And Stuart got little compact rental cars for these rentals, six, eight of them, up in San Francisco.

Q. When was that?

A. That was during that time, around June. We got the cars for about six weeks or so, so they could use them up in that area.

Q. Was that before or after you had written the two series of checks to vendors?

A. Well, it was right in the same time period. I don't remember.

Q. It was all happening together?

A. Yeah, it was all happening together.

Q. Tell me, when Karl told you that you would receive a call, that you would be given names and addresses and that you would pay these bills for the Hart

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campaign, was anyone else present?

A. No.

Q. Where did he tell you that; do you remember?

A. No, I don't remember, but it was probably in his office or mine. And there was no one else around.

Q. And in response to Mr. Glaser's request, that you recall, did you rent the cars?

A. Well, I believe I called a travel agent and she arranged it -- Stuart's travel agent that always did all of his things.

Q. Who's that?

A. The name of the company is Good Life Travel in Newport Beach.

Q. And that was --

A. And I believe that's how it was arranged, was -- you know, she arranged it, because I didn't call directly. I know I didn't do it. She arranged it. Someone else arranged it. It must have been Good Life Travel that did it, because it was difficult to find -- you know, it was quite a thing, you know, to get all the names of the people -- some of them were under twenty-five; rental agencies don't want to rent to people under twenty-five years of age. So, it -- I can

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remember several phone calls back and forth with a travel agent about, well, we got this problem, we have that problem -- solving it.

Q. Who did you deal with?

A. At that time, Rose Cravens. But she no longer owns it. But there is still Good Life Travel.

Q. Did you mention to Ms. Cravens the purpose of the cars?

A. Oh, I don't know if I did. I mean, I must have, but it was -- you know, it didn't mean anything to her.

Q. Were the cars provided to the Hart volunteers, to your knowledge?

A. Yes.

Q. How was that done? Did they pick up the cars? How did they get the cars?

A. They got the cars from a San Francisco rental agency, and all the volunteers went and picked up their own car. It was being guaranteed through the travel agency.

Q. So who contacted the volunteers to tell them how to do this?

A. They contacted me, and I let them know that the cars were rented at such-and-such rental agency in San Francisco and that they could go ahead and pick

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them up once we had finally made all the arrangements.

Q. What was the rental agency?

A. Oh, I don't remember.

Q. Was it one of the big car rental outfits?

A. It could have been. Nothing rings a bell. I've rented so many cars, you know, for Stuart and in connection with the company, there's no way I could remember that.

Q. Do you know how long they used the cars?

A. Approximately six weeks is what I recall.

Q How many cars were there?

A. Six to eight, something like that.

Q. And who paid for that?

A. Well, my understanding was Stuart paid for it.

Q. What is your basis for that? What makes you think that he paid for it?

A. Because I ordered it through him. Why would I go to all the trouble to do that if he wasn't paying for it.

Q. I'm sorry. You mistake my question.

Did the travel agent set up the car rentals? Did they pay for it and then send the bill? How did it happen?

A. See, I don't remember. I don't remember.

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It probably went on his American Express card or maybe he paid for it indirectly by paying Good Life Travel; they paid and then he paid Good Life Travel. It could have gone through the company, also. That's a possibility. I just don't remember.

Q. Do you remember paying for it -- you know, for example, giving a credit card number in the beginning, or was there a bill that you remember seeing after the fact?

A. Well, I remember -- there's one thing about it that I do remember, is that we wanted to use his credit card. And I remember the travel agent, I'm sure, called in and saying, "Listen, we can't use this credit card because he has to actually be there and present it. They have to take an imprint of it. If they can't do that, they won't do it." It was a problem then, and maybe it's changed. So I think it had to be a check or something. You know, it had to be guaranteed some other way, but I don't remember how.

Q. Do you think you wrote a check on Karl's personal account for it?

A. No, I don't. Well, I don't because of this. It had to have come out at the same time as those other checks, and I went through all of those myself and I didn't find it. I would have recognized it.

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Q. Do you mean after the fact? Recently, you went through all those.

A. Recently, right. And I was very careful to go through everything and pull out everything I thought was Hart related, and it wasn't there.

Q. But you think it was not on his American Express?

A. Yes. Somehow I don't think it was on the American Express, so it's starting to lead me to believe that he took a company check possibly to pay for it, that he put it as Good Life Travel did it, it was a business expense, the company could pay for it. You know, it could be something like that.

Q. Did payments to Good Life Travel come from both his personal account and from the company?

A. Yes.

Q. And who determined what the source of the payment should be?

A. Well, Dennis Blackburn typically at that time would go through the American Express bills and pull it out. At a later date, I would.

Q. But did he receive -- did Karl receive invoices or bills from the travel agency?

A. No. Well, yeah, I guess. At that time, I don't really remember that they did. It was more

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of a phone call kind of a thing because they were such good friends. But I can definitely say that later on, I definitely remember invoices from Good Life Travel, you know, for different things.

Q. Not at that point, though?

A. At that point, I don't remember seeing things like that, you know.

Q. So is it more likely that the American Express card was used for it? Is that --

A. Yeah. It could be that the travel agency wrote the check and then the travel agency took Stuart's American Express in payment for it. That's another possibility.

Q. Do you remember the amount that was incurred as a result of those car rentals?

A. Well, I don't remember the total, but it was substantial. Seven, eight cars per week times six weeks. It was quite a bit.

Q. Was that the first time that Mr. Karl had orchestrated the ordering of rental cars for the Hart campaign?

A. That's the first time and the only time that I'm aware of for the specifically Hart campaign workers, excluding Dennis Walto.

Q. Did you say that the workers actually

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contacted you to receive the information about where they should go to get the cars?

A. Well, one of them -- typically, one would call me. As it turned out, Keith began to be the one that would call me more and more and the other ones wouldn't.

Q. Oh, did Glaser use one of the cars?

A. I think he did, yeah. I'm almost positive he was one of the people that had one of the rental cars.

Q. Apart from the rental car arrangement you just described, how many vendors did you pay by check on Karl's personal account in the June and July period?

A. I don't remember.

Q. What were the names of some of those vendors?

A. Well, it's in the newspaper. I just have to look at it. The only one I can remember right now is Aero Wing, two words, Aero Wing. And there were Frisbees for the convention.

Q. Do you know what any of the other goods or services were?

A. Well, some of them were for graphics, for art work, for mailings that were going to be mailed

out, pins perhaps.

Q. Do you know, were these for services or goods that had already been provided?

A. They could have been, but I don't know.

Q. Do you know of any other vendors that were paid in connection with the Hart campaign by Mr. Karl or through Mr. Karl's company?

A. Outside of what I told you, no.

Q. Are you familiar with a firm called Gentlemen's Agreement?

A. Yes.

Q. Can you tell us about it?

A. Well, it's a company that Stuart helped form. He financed it, rather. And it is now -- it does not exist now. But it was kind of a concierge type of business.

Q. Do you recall any payments to Gentlemen's Agreement in connection with the Hart campaign?

A. No. That's a possibility, but I don't remember.

Q. Do you recall any payments to a Ray Struthers, Ltd.?

A. Yeah, I recognize that name. Raymond Struthers, Ltd.

Q. Well, what do you know about the payments,

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if any?

A. I don't. That could be where the or one of the wire transfers went to. That's a possibility. I recognize that name. I have even -- recall that at one point -- but I don't know what it means, really. I'm not sure. I definitely think he is an attorney or has something to do with Hart.

Q. How about a McEwen?

A. Excuse me?

Q. How about McEwen?

A. McEwen?

Q. Yes. M-c-E-w-e-n.

A. Do you have a first name?

Q. Initial "T" or "J".

A. I don't know.

Q. It's not familiar to you?

A. I don't think so.

Q. Do you know if bills were sent to the Hart campaign in connection with the payments that you've just described?

A. I'm not sure. At one point, I think there was some type of an invoice that was made and sent regarding a total of $96,000 worth of contributions or, like, a loan or something that Stuart did. But I'm not sure what is included in that $96,000.

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Q. But you don't remember a particular -- or do you remember particular bills that were sent for the checks that you wrote to the vendors or for the rental car arrangement you just described or for the wire transfers?

A. No. Separately like that?

Q. Yes.

A. No, I don't remember anything like that.

Q. Did Mr. Karl ever give you an intimation about whether he intended to bill the campaign for these?

A. Well, at one point he asked me to add it all up and give him the figure.

Q. When was that?

A. After it was all over, maybe a few weeks.

Q. Before that, though. Before that, had he ever -- had you gotten an impression from him that he intended these to be a gift to the campaign?

A. Oh, I don't remember what impression I had, to tell you the truth. I thought he was just -- let me think. The impression that I had was that he was just simply giving the money away. That was my impression.

Q. Did he do that a lot?

A. He gave away a lot of money.

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Q. Did you say that in the personal account -- did you ordinarily make the deposits to that account?

A. Yes.

Q. For example, did you deposit funds that Stuart Karl had transferred from the company?

A. Yes. I would -- if I didn't do it, Abraham or later on Eddie Herrera would do it. But I would always be the one to make out the deposit slip and stamp the back and do all those kind of things because they really -- you know, I wanted to make sure it was done right, so I did it myself -- not that -- Eddie did it sometimes, but I'd say most of the time it was myself. I had to make sure it was in the checkbook, it was registered, you know. It's so easy to forget if you don't do it.

Q. And how frequently did -- apart from the ordinary salary payments, how frequently did you deposit payments from the company into Mr. Karl's personal account?

A. Oh --

Q. In 1984.

A. I really don't remember. I mean, it wasn't every week, but it was -- seemed like it was every couple of weeks. It seems like he'd get low in between paychecks or something and all of a sudden there

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would be a check from the company.

Q. Do you recall there ever being a proximity in time between the payment of -- the payments that you described on his personal account, the reimbursements that you described and the deposit of funds from the company into his account?

A. Okay.

Q. Do you follow my question?

A. Please repeat that. I think I do. Please repeat it.

Q. My question is, if periodically monies were taken out of the company and put into his personal account, and periodically, as you described, you withdrew cash from his account for reimbursements, and you also wrote checks to some of the vendors, were you ever struck by a proximity in time between the two?

A. That they were consistent with one another?

Q. Yes.

A. No, no.

Q. Did you have any feeling that Mr. Karl was taking money out of the company that he was spending on the Hart campaign?

A. Well, I mean, in a roundabout way, you could say certainly. If he was taking money out of

the company, was it going to his mortgage or was it going for politics? How do you, you know, divide that up? But it was cumulative. He spent so much money on everything that he just needed more all the time, whether it was politics or other things.

Q. But you weren't necessarily struck by monies being put into the account to replace the funds that you just discussed, the political funds?

A. No, not really. I wouldn't say so.

Q. Now, again about the wire transfers, what is your best recollection about how many such transfers you were involved in in 1984?

A. Well, like I said before, there was one definitely. There could have been two or three. I just don't remember.

Q. And did the same person at the campaign call you about these as had called you about the checks that you wrote?

A. No. What I recall about the first wire transfer, and perhaps the only one, was it was a gentleman calling and being very demanding. And I had never spoken to him before, and I don't think I spoke to him since. You know, that was just a -- he was the one that called and asked. It had to be wired immediately.

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Q. Was he -- do you know where he was calling from?

A. I got the impression he was calling from the East Coast where the money was being wired to, you know.

Q. The money was wired to the East Coast?

A. To New York. Well, it went to a New York bank, a prominent New York bank like Chase-Manhattan. It was one of those, you know, that you don't have here in California, or at least it's not on every block. It was a big New York bank.

Q. So you think it was a long distance call?

A. Yeah. I mean, it sounded like it was a long distance call at the time, I believe, because he was specific about the time difference. I think that's why -- he couldn't wait. It was three hours later there; he couldn't wait.

Tape 6

Q. Had Mr. Karl prepared you for that phone call?

A. No, he hadn't. As far as I can remember, he really hadn't because I was really taken aback by this guy. He made me mad. I went into Stuart's office and said, "This man is so demanding. Here you're giving him money, and he's ordering you around, you know, telling you you must wire it and tomorrow's not good

enough." And at that point, Stuart kind of laughed and said, "Well, okay, do it. You know, it's okay."

Q. I guess I don't understand. Did the fellow who called you give you his name?

A. I don't know if he gave me his name, but he gave me the name of the account, the account number, you know, the bank's address.

Q. And so what did you say to Mr. Karl when you went into his office?

A. I said, "This gentleman has called. He demands x-amount of money be wired immediately into this bank account in New York." And I was really -- I was mad. I said, "He's so demanding. He was just, you know, not nice."

Q. Did you tell Mr. Karl his name?

A. I don't know. I must have, I suppose.

Q. Was it someone that Mr. Karl was familiar with?

A. Oh, I don't think so. As far as I was concerned, he was a stranger, at least to me, you know. Perhaps to -- well, Stuart probably knew him, you know. He must --

Q. Well, did you have a sense in your exchange with Mr. Karl that this was a demand coming from someone who was --

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A. Oh, definitely.

Q. -- familiar to Mr. Karl or was a stranger?

A. Well, definitely Stuart -- someone must have told Stuart that this gentleman was going to call, because he went right along with it. He wasn't surprised. He even found it amusing that he was demanding about it. He wasn't taken by surprise at all.

Q. What's your best recollection about what the gentleman's either name was or position was or any other details about him?

A. I don't have any. I'm sorry. I just don't remember.

Q. But you must have actually told Mr. Karl his name, musn't you? You must have said who called.

A. Probably.

Q. Do you think you'd recognize his name?

A. It could have been Raymond Struthers. That's a familiar name to me. I think that name has something to do with the wire transfer, but, you know, I could be wrong.

The only thing I can say about who he was or something, I felt that he was an attorney.

Q. What gave you that impression?

A. The way he talked. You know, just his manner of speaking. I just felt that he was.

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Q. Do you recall him identifying himself as holding any particular position in the Hart campaign?

A. No, I don't. I doubt he did.

Q. You doubt -- I'm sorry?

A. I doubt that he did identify himself to me.

Q. Do you remember any bill that was sent to the Hart campaign particularly detailing those wire transfers?

A. No.

Q. Do you know if the Committee ever repaid Karl or the company particularly for those transfers?

A. Well, I understand that Stuart Karl was paid back ten cents on the dollar for the $96,000. In other words, he was given $9600. And Stuart Karl told me that himself. When all these newspaper stories broke, he refreshed my memory. That was the last phone call I ever had with him.

Q. That's the only payment that you know of?

A. That's the only payment that I know of.

Q. Do you remember a $10,000 payment to the Hart campaign from the company in February 1984?

A. No, I can't say as I do.

Q. Do you remember the purchase by Mr. Karl

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of the campaign's furniture in February of 1984?

A. No. The only thing that I remember that he purchased was a teleprompter, that we ever discussed.

Q. I'm sorry. A teleprompter?

A. Well, that's what they called it. It's like a FAX.

Q. Oh, a FAX.

A. There were two FAX machines, but they called it a teleprompter back then. It was kind of an older FAX machine, I guess.

Q. Before we get into that, let me try to ask a last question. Do you recall being aware of any transactions between, you know, Karl and the Hart campaign or his company and the Hart campaign in February 1984?

A. No, I really don't.

Q. Well, why don't we go on to the FAX machine. Can you relate your recollection about that?

A. At one point, he said that he was going to be purchasing a FAX machine -- or he called it a teleprompter -- for the Hart people. And it's a little vague to me. I don't remember all the details except that we started getting bills from a company whose name I don't remember, but they were always addressed to Americans With Hart, c/o Stuart Karl, 899 West 16th

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Street, Newport Beach, and that was our office. And it was a bill.

Q. Let me show you a document which hopefully will refresh your recollection about it.

(Asides)

What I'm handing you is FEC Exhibit 4, and it's a series of pages which seem to relate to the transaction you discussed, and please take a couple of minutes to look it over.

(The document referred to was marked Federal Election Commission's Exhibit No. 4 for identification.)

THE WITNESS: This is really interesting.

BY MR. BERNSTEIN:

Q. Why don't you describe the documents first for the record, and then --

A. Okay. All of them? There's an invoice here dated 10-31-84 from Telautograph in Los Angeles addressed to Americans with Hart Campaign, Karl Video, 899 West 16th Street, Newport Beach, and it has a "Friendly Reminder" sticker on it and balance due, $6,980.54. And this is what I was describing, yes.

Q. What were you going to observe about it?

I should say for the record, the exhibit

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has several pages, including the reproduction of what seems to be a Post-It stuck it, correspondence addressed to Rama -- presumably you, Ms. Middel?

A. Uh-huh.

Q. Correspondence also to Mr. Rosen, and then a couple of invoice pages.

So, having said that, what other details can you remember about this, having looked at these documents?

A. Well, this I've never seen before, this letter to Doug Rosen. At least, I don't remember ever seeing it before.

Q. Do you recall -- I should say, the letter you're referring to is the one that is addressed to Americans With Hart Campaign, again at the Newport Beach address, attention Mr. Rosen.

A. Yeah.

Q. Who was Mr. Rosen?

A. Doug Rosen.

Q. Who was Doug Rosen?

A. I mean, I'm sure that that's Doug Rosen. That's the only Rosen I know. Well, he's a friend of Stuart's, and he was heavily involved with the Hart campaign in '84 in some finance capacity.

Q. Was he an employee of Karl Home Video

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or Karl Video Corp.?

A. No. He formed a company, a production company called Visual Eyes that produced some of the videotapes later, after 1984. But he was just a friend at this point and a fellow Democrat.

Q. Do you have any idea why correspondence addressed to Americans With Hart Campaign care of Mr. Rosen would have been sent to the address of the business?

A. No.

Q. Do you know of any other correspondence to Mr. Rosen that was sent to the business?

A. No. In fact, like I say, I don't think I've ever seen this letter before. And, also, looking at the -- looking at the first page, I recognize Cathy Bramnick's handwriting here. And then the second page says --

Q. Please tell us what you're referring to.

A. The numbers that are written here. I recognize Cathy's writing and her numbers.

Q. Are you saying all of the handwriting on that page --

A. I believe is Cathy Bramnick's.

Q. The various scribbles?

A. Yeah.

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Q. Okay.

A. And then the second page where the Post-It must have been is Stuart's handwriting. It says, "Cathy, post and pay." And then she writes, "What account?"

Q. Do you know what "post and pay" means?

A. "Post," well, to me, would mean post it to be paid and then pay it, put it on the list of things to be paid.

Q. And what does "What account" mean?

A. And "What account," well, Cathy's saying, "Well, what account is it supposed to come out of?" Obviously, by --

Q. I'm sorry. You're suggesting that the initial thing there is written by Mr. Karl and then "What account" is her rejoinder?

A. Right.

Q. Cathy Bramnick's rejoinder?

A. Right. And so she's not sure. You know, there was more than one account, so she doesn't know where to take the money out of.

Q. How about the next page?

A. Well, that's Stuart's handwriting. It says, "Steve -- we bought. Please pay."

Q. Well, this letter was addressed to you.

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Do you remember it?

A. Vaguely. It was one of those letters that I just took to Stuart and, like, "What do I do with this? What am I supposed to do? Who's going to pay this?"

Q. Do you know why it was addressed to you?

A. No, just that Stuart gives my name to everybody. You know, "Call Rama; talk to Rama."

Q. Can you make sense of the note on top that you just read, "Steve -- we bought. Please pay." Who is Steve?

A. Steve Bornstein.

Q. And his position was?

A. At that time, I don't remember. He was just a consultant. He was some kind of a financial consultant, an analyst. He was going to analyze our growth and analyze what we needed in order to go from the transition, Karl Video to Karl-Lorimar.

Q. Do you know why Mr. Karl would have written this note, would have addressed it to Steve Bornstein?

A. Because, I guess, Steve was into the accounting area and, you know, the financial aspects.

Q. He wasn't signing checks at that point; was he?

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A. I don't know. As a consultant, I wouldn't think so.

Q. Do you remember -- Strike that.

You said, I think, that these FAX machines were in fact provided to the Hart campaign; is that right?

A. Yeah, that's the way I understood it, because then when the convention and everything was over, they got shipped to our address, 899 West 16th Street, to Stuart.

Q. Do you remember the machines coming back, coming to the company?

A. Coming to the office, uh-huh.

Q. Do you remember them, as well, going to the campaign initially?

A. No. I don't think they were ever in possession of Stuart until they were shipped to him afterwards.

Q. How did you first find out about the -- or first learn about it; from Mr. Karl?

A. Yes. He said, you know -- like I said before, he said one day about buying the teleprompters for the Hart campaign that would ultimate be his, you know.

Q. On the last page of this exhibit, the

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order date is April 13th, 1984. Do you see that?

A. Yes.

Q. Do you recall if this was the first instance of Mr. Karl buying something for the Hart campaign?

A. I don't know. It's obviously one of the first when I was there.

Q. Do you recall Mr. Karl or the company buying a computer for the Hart campaign?

A. No.

Q. You said earlier, Ms. Middel, that there came a time when you compiled expenditures that had been made, and I wonder if we can get back to that.

When did that take place?

A. It was after all the checks had been written and after -- I'm sure it was after the Democratic Convention in '84. It was after the fact.

Q. And tell us as best you can how that happened?

A. He just came into my office one day and said, "I need you to add up all the money that was written to Hart. We need a total." And so I did.

Q. How did you go about doing that?

A. Well, I remember going through the checkbook and just taking those amounts.

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Q. Now, when you say "the checkbook," you mean the personal --

A. His personal checkbook.

Q. -- account?

A. Uh-huh.

Q. And those would have been the checks in June and July that we started off describing?

A. Right.

Q. What else?

A. And then the wire transfer or transfers, I'm sure, would have been added to that.

Q. How would you have found out about that?

A. Well, it wasn't that long after. I just called up Cathy and said, "Tell me what those amounts were. Remember the wire transfer?" And, you know, she couldn't forget it either because she was so busy that day. It was a terrible burden for her to have to wire transfer money.

Q. Do you remember talking to her about that, getting the total from her?

A. Yes. And I don't remember anything else. There probably was something else, but I don't know. I mean, it added up to quite a bit.

Q. Did it include the teleprompter, quote/unquote?

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A. Oh, I suppose it could have, although I don't remember what the --

Q. Well, I guess what I'm trying to get at is, try to remember, even if you can't remember exactly what was in it, what sources you went to to compile this list.

A. Oh, well, that's all I remember, is my checkbook and hers.

Q. Did you look at any American Express card bills, for example?

A. I don't think so. I don't remember doing that.

Q. Did you seek information from elsewhere in the company about company checks that might have been written?

A. Well, I would have asked Cathy, you know, at the same time I asked about the wire transfer, I'm sure.

Q. Well, do you have a recollection of that, that your conversation with Ms. Bramnick involved more than the wire transfer or the --

A. No. No, I don't recall. I don't remember.

Q. Were there any other sources?

A. Not that I can recall.

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Q. So, really, the information that Cathy Bramnick might have related to you and then your own tallies from the checkbook?

A. Right.

Q. And that was it?

A. That's all I can recall. And I suppose I would have added in the rental cars, however they were paid for.

Q. Well, do you remember what you looked at for that?

A. No, I can't remember.

Q. Was it a long exercise? Did it take a while for --

A. Yeah, it took a couple hours because Cathy had to go back through her books, and she was always so, so busy, just like I was. It took -- you know, it took a couple hours.

Q. What happened then?

A. When I got the total, I gave it to Stuart.

Q. I'm sorry. Did anybody else help you besides Ms. Bramnick in compiling this?

A. No, I don't believe so. It wasn't something that everybody knew.

Q. Okay. Please go on.

A. It was just Cathy and I, as far as I know.

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Q. I'm sorry. You were saying you provided this list to --

A. Oh, I, you know, gave the total to Stuart. That's what he wanted. I suppose I probably even wrote down what all the items were and showed it to him.

Q. And do you know what he did then?

A. No. I can only speculate it was because a Hart person wanted the total. You know, it definitely had something to do with the Hart people wanting -- needing to know what the total was.

Q. It was not something initiated by Mr. Karl?

A. I don't think so.

Q. Well, can you recall why it is you think that it might have been initiated by the Hart people? Did Mr. Karl say that to you?

A. I don't remember. I mean, I'm getting to where I'm speculating here too much. I just don't know.

Q. Uh-huh.

A. The reason I'm saying that is because, you know, they came up with a $96,000 total. I mean, that's a fact -- I've been told, anyway, that's a fact. They did pay $9600, ten cents on the dollar, which is a fact. Obviously, the Hart people needed to know what

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this total was so they could settle it somehow and have it all be legitimate or look --

Q. Well, can you remember Mr. Karl giving you any indication that the request was coming not from him alone but from the campaign?

A. I can't remember.

Q. Okay. Now, the $9600 payment that you were describing, did you deposit that in Mr. Karl's personal account?

A. I don't remember, but probably.

Q. Do you know when that was?

A. No.

Q. Do you know if it might have been deposited in the company's accounts?

A. I doubt it.

Q. Why do you say that?

A. Because if it was made out to Stuart Karl, I'm sure he put it in his account.

Q. Why do you think it was made out to Stuart Karl?

A. Because I believe the campaign believed that it was Stuart's money, not the company's money. And I seem to recall a check coming for that amount, and, you know, I'm just sure it went into his personal account.

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Q. Do you have a recollection of a check that actually was made out to Stuart Karl?

A. Vaguely. It's funny, though. It seems to me it was in handwriting and it wasn't even typed, which sounds unusual for a campaign; doesn't it? But it seems to me it was written, handwritten in ink, and not very good handwriting either, for the $9600. And I'm just sure it went into his account. Even if it was made out to Karl Video, Stuart somehow would get it into his account. That's just the way he was.

Q. Can you think of any other payments to vendors or goods that were provided to the Hart campaign by Mr. Karl in that period?

A. Well, there were some helicopters and private jets that were provided at different times.

Q. Yes. I hope, Ms. Middel, that we'll pursue that a bit later.

A. Okay.

Q. Anything other than that?

A. I can't think of anything offhand.

Q. Ms. Middel, do you know what invoices sent out by Karl Home Video, Karl Video Corporation looked like? Did you see them?

A. Oh, I must have seen them, but I don't remember.

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Q. Invoices generally, I mean.

A. KVC invoices?

Q. Yes.

A. I must have seen them, but I can't picture it in my mind right now.

Q. Ms. Middel, do you know a man named Dennis Walto?

A. Yes.

Q. How did you meet him?

A. Through Stuart Karl.

Q. Could you elaborate?

A. I believe the first day I met him was the day that Dennis and Stuart had lunch together. They were going to discuss his employment, he becoming an employee at Karl-Lorimar Home Video.

Q. When was that?

A. June of '86.

Q. And what happened?

A. Well, I met him either that day or a day soon after when he did become an employee. He was hired.

Q. Had you seen him at all in the company's offices before that?

A. No.

Q. And can you estimate how long it was be-

tween when you first met him and when you understood that he was put on the payroll?

A. I believe it was just a matter of days or maybe a couple of weeks.

Q. Do you know what his job was?

A. Oh, he was hired -- I'm not sure what the official title was. He was a person who would go around the country to the retail video stores and do a report on Karl-Lorimar product. He would make sure that the retailers were happy, that they had all of their -- what they call POP material, point of purchase material, which included posters and, you know, marketing tools such as that. And that is what he was hired for.

Q. Do you know what his title was?

A. No.

Q. Do you know what someone whose title was a production assistant would do or would have done at Karl-Lorimar in 1986?

A. Okay. Well, a production assistant would help assist on the production of a video, and that would be -- at that time, would be under E-J Oshin's direction.

Q. So that doesn't describe the duties you were just relating that you thought Mr. Walto was going

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to do?

A. No. But let me add this --

Q. Yes, please.

A. -- that his title, I believe, was changed to production assistant. That was not his original title, though. That was his ending title.

Q. What was his original title?

A. Like I said, I don't remember. It was something Stuart made up. I remember the day he made it up. It didn't -- I never heard it before.

Q. Why do you think he made it up?

A. Because I remember him sitting at his desk, just saying, "What will we call Dennis?" And he thought and he thought and he thought, and then he finally came up with some strange title.

Q. Was this not an ordinary job?

A. Right.

Q. Why don't you tell us why you think it was not an ordinary job?

A. For Dennis?

Q. Yes.

A. Well, it wasn't an ordinary job because it just so happened that his going around to video retail stores happened to coincide with wherever Senator Hart was on the campaign trail at that time. In other

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A. For Dennis?

Q. Yes.

A. Well, it wasn't an ordinary job because it just so happened that his going around to video retail stores happened to coincide with wherever Senator Hart was on the campaign trail at that time. In other

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words, he was always -- he was always where Senator Hart was. You know, a day before or the day after, he was constantly working on the campaign actually.

Q. Did you understand that was what he was going to do from the beginning?

A. Yes.

Q. Did Mr. Karl tell you that?

A. Yes.

Q. Do you know who his supervisor was, Mr. Walto's supervisor?

A. No, I don't know. I thought he just reported directly to Stuart, actually, and myself -- you know, through me.

Q. Do you know what his salary and other benefits were?

A. He received $3,000 a month salary, his expenses for traveling to the video stores, and a car.

Q. And the amounts you just described all came from the company?

A. Correct.

Q. Did he report to Mr. Karl about his visits to video stores?

A. I don't know. I didn't see it. I didn't hear it.

Q. Did you see written reports submitted

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to Mr. Karl by other people in the company? Did they cross your desk?

A. Written reports?

Q. Yes.

A. Concerning what?

Q. About the company's business activities.

A. I'm not sure I understand what you're saying.

Q. In the ordinary course, did reports that were being forwarded to Mr. Karl go through you?

A. Absolutely. Everything that went to Mr. Karl went through me. Both ways: from him and to him.

Q. So do you recall anything in writing that Mr. Walto, once hired, submitted to Mr. Karl?

A. I think there was one report. That's all I could say for sure, that there was one -- maybe one.

Q. When was that?

A. In the very beginning, when he'd first been hired, maybe just a few weeks.

Q. What did the report say?

A. I didn't read it, but it was a -- some kind of a form, a form sheet where he had written down some information about visiting a video store. And it was a form sheet, typed form sheet, and he had filled

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it out in his handwriting.

Q. Was it a form you were familiar with?

A. No, I don't believe. I think it was made up just for him. I mean, it was something -- I could have made it up myself, but I don't remember. It was just something that was made up just for him to do his reports.

Q. So was it your understanding that he was going to in fact visit video stores?

A. It was my understanding that he was going to do that, but that was not his primary purpose. He was going to fit that in.

Q. Was there any expectation of how much time he would spend visiting video stores?

A. Not to my knowledge.

Q. I think you said that his supervisor, if he had one, was Mr. Karl; is that right?

A. Yes.

Q. So there was no one else in the company who was responsible for overseeing his work?

A. I don't believe so.

Q. Was that unusual?

A. Yes.

Q. Was that because his work was primarily work on the Hart campaign?

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A. Yes.

Q. That was your --

A. That was why.

Q. How frequently was he in the office?

A. Oh, he was in the office maybe once a week, once every two weeks.

Q. What other benefits did he get as an employee?

A. Well, he got the usual Lorimar benefits of health insurance and life insurance and dental insurance.

Q. Anything else? Any other perks?

A. Oh, I suppose he got 401K, you know, the -- if he took advantage of it. There were different options.

Q. How about a car?

A. Oh, I said the car, yeah.

Q. Did --

A. He got the car, and I believe he got his insurance paid for. By having a company car, he has his insurance paid for also.

Q. What kind of car was that?

A. Well, it was one of the cars that the company already had: a Bronco, a Ford Bronco, white.

Q. Did you have an impression that he used

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this car to travel elsewhere than Southern California, or not?

A. He didn't take the car anywhere outside of Southern California. He only used it when he was in town. Otherwise, he was always getting rental cars in other cities.

Q. Was the car reserved for his use, nonetheless, the whole time?

A. Pretty much, yeah. I mean, it was parked -- a lot of times he would leave it in the parking lot so any other employee could use it. He wouldn't take it home, necessarily, and be gone for two weeks and then no one could even use the car. I mean, he was pretty good about it. If he had to be gone for a few weeks or ten days, he would leave the car in the Lorimar parking lot so other employees could use it.

Q. Do you remember any advances, paycheck advances to Mr. Walto?

A. Not really.

Q. How were his expenses paid?

A. Well, he would collect his receipts for everything and then make out an expense report and then submit it to myself, who was supposed to check it and give it to Stuart, who would sign and approve it. And then it would go to Accounting.

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Q. And how often did that happen?

A. I don't really remember. You know, definitely every few weeks. But, see, there's a time period here where he switches from doing this to being production assistant. Suddenly, there are no travel benefits and there are no reimbursements for travel.

Q. Well, let me pursue that. Before we get to that, if the papers were then forwarded to Accounting, what happened next? Did the company issue him a check?

A. I guess. I mean, I wouldn't be there to see that, but that would be what should happen.

Q. Can you estimate the number of times that took place?

A. I don't know. I can't estimate it. I'm sure I saw at least -- at least two or three reimbursements filled out. You know, he'd collect them for a few weeks and then turn it in all at once.

Q. Did the reimbursements include plane fare, lodging, meals, that sort of thing?

A. Everything, as far as I know. The plane fares would have been paid directly to the travel agency as they had a special corporate account, so it wouldn't have come through on that reimbursement. Just the hotel, rental cars and meals.

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Q. Was this, again, the Good Life Travel?

A. Yes.

Q. So how would that have worked, his plane ticket?

A. Well, Good Life Travel had a corporate account set up just for Karl-Lorimar Home Video. If anyone called and needed to make reservations, they'd say, "Is this on the company -- is this a company expense?" "Yes." It would go on a separate bill that would be billed directly to the Accounting Office every month. I never saw it.

Q. You don't know how detailed the bill was?

A. Right. I don't know what it looked like or anything. I never saw it. And, therefore, Dennis would never have an airplane -- would never have his airfare on his reimbursement. It was already taken care of through the travel agency.

Q. So he contacted the travel agency?

A. Yeah, he did. I mean, sometimes I would for him, but he pretty much did it himself, you know, because the schedule was pretty crazy.

Q. Did all of the expense reimbursements come from the company, as far as you know?

A. For a period of time they did, until they changed position.

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Q. When did his position change?

A. I don't know.

Q. He began work, you said, I think, in June 1986.

A. Yeah. Well, I think it was July, was his actual hire date.

Q. What can you remember about the change in position and duties or what that involved?

A. Youknow, it didn't really mean much to me because he was still doing what I knew he was doing the whole time. So it didn't really matter that they changed his title.

The only thing that mattered to me was that suddenly I was having to reimburse him through Stuart's account. The company no longer was doing it because that wasn't his position. So when he traveled, I had to give him a cash advance from Stuart's account. I had to write him a check to reimburse him for the difference when he came back. So he would still fill out a reimbursement sheet, but it would just go -- it would be for Stuart, not for the company.

Q. I'm sorry. Did that come from the First Interstate account, or this would have been later?

A. Well, by now he's at Western Empire.

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Q. Western Empire?

A. Uh-huh. Yeah, definitely. There's a lot out of that one.

Q. Do you know why his position changed?

A. No, I don't know. I don't know what happened. Stuart obviously decided that it wasn't a good idea to have him traveling around, that someone might catch on that he's -- you know, he just happens to be in the same cities as Hart. I don't know. He must have thought about it and thought myabe it wasn't such a hot idea and that the salary was enough. Stuart was concerned that Lorimar would catch on.

Q. What's your best estimate about how much time had passed after he came on before his change in status?

A. It wasn't very long. Six weeks, eight weeks maybe.

Q. Did his salary change?

A. No, that all remained the same.

Q. Did he have a supervisor, a different supervisor?

A. Well, E-J would have been his supervisor as production assistant.

Q. Do you know that she was his supervisor?

A. No, I don't. I don't know. I don't

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really think so.

Q. Do you know if she had any contact with him, or communications?

A. Well, I think that they might have been working on -- he might have been helping her when he was in town with the Hart video and things like that, which was a possible Lorimar video project. So, I mean, he might have been doing some actual company work there.

Q. Do you know Mr. Mark Lambert?

A. Yes.

Q. Who is he?

A. He worked for Karl-Lorimar in Development.

Q. Development? Does that mean development of new projects?

A. Right.

Q. And was he the Director of Development during this period, 1986?

A. Yes. His title changed at some point, though, and he became -- and I don't remember what it changed to. But it still all had to do with acquisitions and development.

Q. To your knowledge, did Mr. Lambert have any supervisory role over Mr. Walto?

A. Not that I was aware of.

Q. Do you know if he had any contact or com-

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munications with Mr. Walto?

A. Not that I'm aware of outside of just seeing him in the office.

Q. Would Mr. Lambert, in his position, have supervised someone whose title was production assistant?

A. Not as the Vice President of Development, no. That's totally different. See, what I think happened was E-J was Development. Stuart took E-J out of that and put her in production and put Mark into Development. That's the way I remember it.

Q. Do you remember -- Going on to the time that his status had changed, as far as you knew, Mr. Walto's activities remained the same?

A. Yes.

Q. Do you know if he visited any video stores after his status changed?

A. Oh, I don't think any video stores when he became production assistant. That was like -- that made it easy for him to just really concentrate on just being on the Hart campaign trail. And then when he was in town, he could help E-J, you know, in different ways.

Q. Did he have a business card?

A. Dennis? Gee, I don't know. Yeah, you know, I think he did. I think I remember him having

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a box of cards come in that said "Dennis Walto" and "Karl-Lorimar," yeah.

Q. Do you remember if they were the ordinary cards the firm used?

A. Yeah, they were the same that I would have.

Tape 7

Q. Once his status changed, you said you started writing him checks for his expense reimbursements?

A. Yes.

Q. For how long did that go on?

A. That went on until Stuart was terminated in March of '87, although Dennis terminated in November, I believe, of '86.

Q. Why was that?

A. Stuart told him that he should quit, he should just terminate himself, that Stuart didn't feel comfortable anymore having him there under the pretense.

Q. Why was that?

A. Well, he was afraid someone was going to catch on. So it thought it better that Dennis just -- you know, I guess he felt he got away with it for long enough and he better get Dennis out of there. And so he did -- Dennis terminated and just went on to a payroll at another one of Stuart's companies.

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Q. What was the name of that company?

A. Complete Productions.

Q. What was his salary?

A. The same: $3,000.

Q. Who supervised him?

A. Stuart and myself.

Q. Who signed his new paychecks?

A. I don't know. I never saw his paychecks.

Q. Did you continue to reimburse him for expense reimbursements?

A. Yes.

Q. From Karl's personal account?

A. Right. He got his paycheck from Complete Productions, but his reimbursements for travel and such came from Stuart's personal account, which I would do.

Q. And how about his airfare at that point?

A. That would go on Stuart's American Express.

Q. Do you remember that's what -- and it was once he left the company, are you saying that he no longer booked flights through the travel agency the compan used, but instead used --

A. No. He booked still through Good Life, but Good Life would just put it on Stuart's personal credit card instead of billing the company for it.

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Q. Did you tell them to do that?

A. Did I tell who?

Q. Good Life.

A. Oh, yeah.

Q. Who told Good Life to change the way Walto was being billed?

A. Oh, well, it was just a matter of fact. He wasn't an employee anymore. You can't bill the company for someone that doesn't work there.

Q. Where was the office of Complete Productions?

A. It didn't really have an office. I believe it was run out of a house, you know, or the person who ran it was at Karl-Lorimar a lot, so I think they kind of used some extra office space in the other building.

Q. What was Karl's relationship with Complete Productions? Can you flesh that out a bit?

A. Well, it was a company that he conceived of and got it off the ground by making sure that it -- that Karl-Lorimar used it for production of a couple of videos, one being called Simply Sushi. And I don't remember the other ones. So if it wasn't for Stuart, then the company would have never got off the ground.

And the person who ran it -- her name is Alison Weir, who is a long, long-time friend of Stu-

art's.

Q. And did Mr. Walto continue using the Ford Bronco?

A. No, he gave it -- you know, turned it back in to the company, at which time Stuart signed for a leased car, which was a Cavalier, a black Cavalier for Dennis to use, signed it -- guaranteed in Stuart's name.

Q. Who arranged that?

A. I did.

Q. With what lease company?

A. I don't remember the name of the lease company. He had so many different lease companies, it would be hard to say. There was a place called Kerrilease, and there was another one called Browning. It could have been one of those.

Q. How was that paid?

A. Stuart was billed directly.

Q. And did you treat that as a personal expense of Mr. Karl's?

A. Yes.

Q. And was it then paid by you on the Empire account?

A. Right.

Q. Do you recall, how long was the lease

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term for?

A. I believe it was a short one. It was only for two years.

Q. And were there periodic payments on that?

A. Well, it was a monthly lease.

Q. And did you make out the montly checks on a monthly basis to pay for it?

A. Right.

Q. And did Mr. Walto have exclusive use of this car?

A. Yes.

Q. And then what happened?

A. Well --

Q. When did his status change again, if it did?

A. Oh, well, it changed to unemployed in March of '87, when Stuart was terminated and I was laid off as a result of it. Stuart instructed me to call Dennis and tell him, "No more. We can't afford you anymore. Sorry."

Q. What happened to the car?

A. Well, Dennis kept the car because Stuart owed him quite a bit of money still in reimbursements for --

Q. For his travel?

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A. Right. Dennis had accumulated perhaps $1500 worth of expenses, and Stuart was not able to pay that off all at once. And so Stuart said, "Listen, this is what I'll do." No, it was probably more like around $3,000 or $4,000. It was a substantial amount of money that Stuart couldn't just -- at that time, Stuart was not willing to just write him a check because he had to be careful with his money. He just got cut off. You know, he just lost his job.

So Dennis kept the car. Stuart said, "You keep the car. I'll just keep paying for it, and that'll help pay off what I owe you." And Dennis agreed, "Okay. I get a car for a year," or something, you know.

Q. So do you know how much longer that continued?

A. I don't know. I mean, the last time that I worked for Stuart, Dennis still had the car.

Q. I'm sorry. When was that?

A. September 1st; the 1st of September of '87. And at that point, Dennis still had the car.

Q. And thereafter, you don't know?

A. Yeah, I don't know anymore after that.

Q. Do you remember what the monthly lease payment was for that car?

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A. It was about $280.

Q. Did you have communications with Ms. Weir, who you described, about Mr. Walto?

A. Yes.

Q. When did they take place?

A. Well, she would have to -- she was working on -- also working with Dennis on the Hart video, as I understand, and we'd have communication that way. And she would also -- when it was time for Dennis' paycheck, sometimes she didn't have the money to give him. He was paid twice a month, so $1500 every two weeks. And sometimes she wouldn't have the money in the Complete Productions account, so she would have to call me or come by and say, you know, "Can I get a check so I can give Dennis his paycheck?"

Q. And did you do that?

A. Sometimes, yeah. I mean, sometimes I'd have to put her off a few days or something, but it eventually got done.

Q. And, again, where did that money come from?

A. Stuart's personal account.

Q. Which at that time was the Empire --

A. Western Empire.

Q. Western Empire account?

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A. Right.

Q. How many such checks were there?

A. I don't remember. And I can't say that they always came out of Western Empire. I mean, it's possible that they on occasion could have come out of Bank of America. Or by that time, Stuart had opened up a couple of cash -- what they called Ultramax's at Bank of Newport in Newport Beach. He had a couple of them, either two or three. And --

Q. Were those personal accounts or company accounts?

A. Personal accounts, all personal. So it's possible money could have come out of those, also.

Q. Did you have signatory authority on those Newport --

A. On one of them, I did. Another one, I didn't. But I still kept track of it for him.

Q. Who did you make the checks out to?

A. Oh, I don't remember. I don't remember if it was Complete Productins or if it was cash. I don't know.

Q. But this is in the period December '86 to March or so, '87?

A. Right.

Q. Do you know if anyone else other than

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Mr. Walto was employed by Karl-Lorimar of his level who were given a company car as a perk?

A. Excuse me. Can you repeat that?

Q. Did it strike you as unusual that Mr. Walto was given a company car?

A. No, because I knew what Dennis was there for. I mean, Stuart told me.

Q. Did it strike you as unusual compared to other employees?

A. No. Our company at that time was very lavish. Everyone got all kinds of benefits. It was a pretty incredible company, the way they ran it.

Q. So the -- actually, the providing him of the car was not the most unusual feature of his relationship?

A. Not at all.

Q. There were others, but not that?

A. Not at all. Almost everybody had a company car, it seemed like.

Q. Do you know what Mr. Walto's background and experience was?

A. Well, I did see his resume when he first started or right before he started, and I read it with interest. He had a lot of political experience in helping candidates. And he personally told me he worked

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on the Hart campaign in '84, that the Hart campaign had ruined his credit, he had no credit cards, that he had charged them all up and they never paid him back. And so that was his background. And he's a very bright individual.

Q. Did he have any background in the video business?

A. Not that I remember.

Q. Or in the television or movie production business?

A. Not that I remember.

Q. Or in the retail sales business?

A. Not that I remember.

Q. Can you tell me, did Mr. Karl own any other companies besides Karl Home Video, Karl Video Corp., later Karl-Lorimar, and then you also described Complete Productions, I guess?

A. Yes.

Q. Did he have any other companies?

A. Okay. When I say "owned," such as Complete Productions, his name won't appear anywhere as owning it, I'm sure. But when I say that he really owned it, is because he started it and he took money from the company for his own, you know, personal use.

All of George Unwin's companies, for

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example, were really Stuart Karl companies, although his name won't appear on that either, I'm sure.

He also had a company called Promoview, which didn't do so well.

Q. Promoview? How is that spelled?

A. P-r-o-m-o-v-i-e-w, one word.

Q. Promoview?

A. Uh-huh.

Q. What did that involve?

A. That was a video -- also a video company, but on a different kind of a level where it appealed to companies, a way to advertise and market for companies instead of sending out marketing material through the mail, as companies do -- send a videocassette that an executive could go home and pop in and watch for fifteen minutes. But, like I say, it didn't do well and it eventually went out of business.

Q. When was this?

A. Well, he started it in December of '84, right after the Lorimar acquisition, although it was really against his contract. But on the QT he started it. And it went for about a year, year and a half -- well, maybe longer than that. Let's see. It was into '86 before they finally gave up, and it went under.

Q. How about Rewind Productions?

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A. That's one of George Unwin's companies.

Q. And Continental Marketing?

A. Yeah. That's the next one I was going to get to, and the reason that he was terminated. CMD or Continental Marketing Distributors was the last company that he formed, under his father's name.

Q. And what did that involve?

A. That was a marketing company that did the POP material, point of purchase material, the actual cassette box covers and posters and all the promotional material for the videos. And he managed, of course, to make sure that they got the Karl-Lorimar account, which was, you know, great. They made all kinds of money.

Q. Who else was involved in that?

A. Court Shannon and Gary Hunt.

Q. These were two other executives of Karl Home --

A. Right, who were also ultimately terminated.

MR. MICHAELSON: I need to use the restroom. Is this a good time to break?

MR. BERNSTEIN: Certainly. Off the record.

(Whereupon, a brief recess was taken.)

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MR. BERNSTEIN: Back on the record.

BY MR. BERNSTEIN:

Q. I think, Ms. Middel, you had spoken about Continental Marketing Distributors, and I think I was about to ask you about K-L Productions.

Q. K-L?

Q. Yeah. Is that familiar to you? Or Karl Productions Corp.?

A. No.

Q. It's not familiar?

A. No.

Q. How about Cooper-Hamilton Corp.?

A. Yes. That's the company that Stuart formed in 1985, but he never really did anything with it. He had corporate papers drawn up with the Secretary of State and all that, but he didn't really do much with it until he was terminated. And then that became the name of his new company.

Q. Do you know if he engaged in any political activities using that new company?

A. No, I don't think so. I mean, at that time and everything, he was pretty politically tapped out.

Q. How about Starlight Associates?

A. Starlight Associates? That sounds famil-

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iar, but it doesn't -- it sounds like a company that had to do with a video company.

Q. How about Karl Duplicating Company?

A. You're pulling up some old names that were before me. Karl Productions, Karl Duplicating, I think those were all things that were before Lorimar, before my time, way back.

Q. Well, let me try a couple more, but these might be more of the same. Karl Enterprises?

A. Yeah, that sounds like another one.

Q. Karl Record Corporation?

A. Yeah, another one.

Q. Karl Entertainment Corporation?

A. Yeah. Those are all old names of old companies that he -- you know, it was before me. All I can assume is that he was going to start something under that title but never did or it just didn't work out -- something.

Q. Well, do you know, did any of these have a continuing existence after the formation of Karl Home Video Corp.?

A. I don't think they ever had much of an existence at all, and they definitely didn't have any existence or -- you know, the name might have been there, but that's it.

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Q. Okay. The firms that we've just discussed, did any of them actually have their own employees?

A. No, not that I know of, not that I'm aware of. But like I say, remember, this is before my time.

Q. Who were the employees of Complete Productions, to your knowledge?

A. Alison Weir was the only person that I'm sure of. Maybe Kelly Ramsey. I'm not really sure.

Q. I am now handing you a document that is going to be FEC Exhibit 5, and I wonder if you can look at it and -- It purports to be an accounting document showing several transactions, the period ending -- what looks to be either 7- or 8-31, 1984, KVC. Do you see the description of "Hart car rental"?

A. Yes.

(The document referred to was marked Federal Election Commission's Exhibit No. 5 for identification.)

BY MR. BERNSTEIN:

Q. Let me ask you first, are you familiar with this form or not?

A. No, I've never seen it before.

Q. All right.

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A. It looks like something Cathy would keep, Cathy Bramnick.

Q. My question is: Does this come at about the right time --

A. Oh, sure.

Q. -- to reflect a bill or bills for the car rentals that you described at some length?

A. Yes.

Q. Do you recognize the handwriting?

A. I believe it's Cathy Bramnick's.

Q. You don't remember her giving you a form like this that you might have used to compile your list?

A. No, I don't.

Q. Let me take that from you, Ms. Middel, and hand you Exhibit 6, and that is a charge plate on the plate of Abraham Kantzabedian for $153.75. And in the upper part of it, there's handwriting, "Budget Rent A Car (Hart campaign)."

A. That's my handwriting.

(The document referred to was marked Federal Election Commission's Exhibit No. 6 for identification.)

BY MR. BERNSTEIN:

Q. Is that your handwriting?

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A. Uh-huh.

Q. How marvelous.

If that's your handwriting, what can you recollect about this?

A. Boy, I don't. It's like something out of the past that I don't remember, really. But, obviously, Abraham put the charge on his charge card, yeah. That was the other possibility I didn't think of, that Abraham had a charge card that could be used.

Q. This appears to have been an earlier charge, as well. It's dated in March of 1984.

A. Oh, yeah, it is. But it doesn't show -- as far as I'm concerned, it doesn't show that it's for Budget Rent A Car, although I wrote that up here.

Q. Well, I'm a bit embarrassed to admit that indeed the illegible portion of the vendor --

A. Oh, it does say it, huh?

Q. -- you can see the "B-u-d" there, and there's every reason to think that that says "Budget."

A. Okay. I believe you.

Q. Or said "Budget."

A. Yeah. And then down below is my handwriting, too, where I put, "Plus 360." I put "360" for some reason, plus this $153.75, "To Abe, total $513.75." Who knows what the other 360 was for.

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Q. Was it generally your responsibility to reimburse Mr. Kantzabedian for his expenses?

A. Yes, I would oversee. He would give me his reimbursements, and I'd look at them and make sure that they were -- they seemed appropriate.

Q. Do you know what that other amount, the $360 was?

A. No, I don't. It could have been a deposit on the cars or something to get the whole thing started. I don't know. It could be unrelated, but since it's all together, it seems like it would be related.

Q. Well, I guess my question is, if you wrote on top in parens, "The Hart Campaign," can you recall what it is that gave you that understanding?

A. No, I can't remember.

Q. Do you have a recollection of rental cars that were rented for the Hart campaign prior to the May/June transactions that we discussed earlier?

A. No, I don't. The way I remember it is just that the cars were rented for about six weeks, maybe eight weeks, around the convention time. And this is a little -- this is premature to that. But I don't know. I don't remember.

Q. Would you have received any other form that elaborated on this from Mr. Kantabedian, in the

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ordinary course, you know, to pay his expenses?

A. No, because Abraham wasn't real good at that. He couldn't -- He wouldn't be filling out a reimbursement form very well, so he'd pretty much just give me the receipts.

Q. What's the note at the bottom in that bold writing?

A. That's Stuart's writing, and it says, "Cathy, okay," which means "Cathy Bramnick, okay to pay."

Q. So if this -- does this mean that you wouldn't have paid this from Karl's personal account?

A. Right. That means Cathy Bramnick paid it from Karl Video.

Q. Now, you saw all of Mr. Kantzabedian's expenses, and I think, as we've discussed several times, was there then the ordinary determination about whether some of these things were business related and some were not?

A. I think I pretty much saw all of his things that he wanted to be reimbursed for, particularly personal ones that Stuart would pay him back for, obviously since I handled that. And I think I would be overlooking things like this, too, before they went to Cathy or before they went to Stuart, just to make

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sure that Abraham wasn't making a mistake, which sometimes, you know, would happen. So, yeah, I'd say pretty much so.

Q. Do you remember any other Hart campaign related activities that Mr. Kantzabedian was involved in?

A. Well, Abraham was gone a lot of times, sometimes, and he would travel and do, you know, different things. And sometimes I didn't know exactly what he was doing, especially when I first started. He was just gone. So I'm sure that he did things for Stuart politically, arranged things, things that I was not involved with. Maybe Stuart didn't even want to tell me at that time. But I'm sure that he was politically involved for Stuart.

Q. Do you know of particular activities that he engaged in?

A. Oh, boy, that's hard to remember.

Q. I'm handing you now two sheets. One is Exhibit 7 and one is Exhibit 8. I'd ask that you look at them. One is a copy of a calendar page, and the other is a telephone message.

A. Uh-huh.

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(The documents referred to were marked Federal Election Commission's Exhibit Nos. 7 and 8 for identification.)

THE WITNESS: Yeah, that's my handwriting. This is my calendar page.

BY MR. BERNSTEIN:

Q. And dated January 29th, 1987. And what it seems to say there is -- well, maybe you can just read it since --

A. It says, "Travel sheet from Rob for Dennis Walto for reimbursement."

Q. And what does that mean?

A. I'm not real sure. Dennis wasn't with the company anymore at that time, as far as I understand, so the only thing I can think of is that I was going to get some blank sheets from Rob, travel blank sheets from Rob, so that I could give them to Dennis so that he could just use them.

Q. Who is Rob?

A. Rob Bonham. This does not mean Rob has anything to do with it. I probably was going to get blank travel sheets from Rob just to use -- to give to Dennis to use, to fillout even though, you know,

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he was not with Lorimar any longer. I'm sure that that's what that was.

Q. Now, in this period, you were paying Mr. Walto's expenses from Stuart Karl's personal account?

A. Right. We just needed some kind of a form for him to use, and it easy to just use the travel forms that Lorimar had.

Q. Okay. The next one also relates to Mr. Walto, and it's a telephone message.

A. Uh-huh.

Q. And this appears to be much earlier. It's August 18th, and I infer 1986.

A. Right. This is typical for Dennis to call and leave phone numbers where he could be reached in case I needed to call him for Stuart.

Q. Well, did you have any indication of what activities he was engaging in at these various places?

A. No. At this time, no.

Q. What was the purpose of him leaving these messages?

A. So that I could call him because he wasn't in the office, because he wasn't going to be around for, you know, days or weeks.

Q. And you called him regularly?

A. Well, Stuart might want to check in with

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him, ask him a question or something. And so I would have to be able to get ahold of Dennis. Dennis would frequently call with a message like this and just leave numbers where he'd be, just in case I needed to get ahold of him. Otherwise, I wouldn't know where he was for days.

Q. You don't know -- The indication there is that one of the numbers is -- seems to say "Gary Hart's office." The other two are "friends" and "friend." Do you know who those people were or --

A. No.

Q. -- what Mr. Walto was doing there?

A. No. Dennis had a lot of girlfriends.

Q. Thank you.

(Pause)

Ms. Middel, did you yourself have dealings with Steve Rivers during 1986?

A. I spoke to him quite often.

Q. Do you know what involvement, if any, he had with Mr. Karl's political activities?

A. I'm not sure exactly what it was Steve Rivers was providing Stuart or the company, for that matter. I really don't remember.

Q. Did he have an office on the company premises?

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A. No. He worked out of Jane Fonda's office in Santa Monica.

Q. Do you know about any movies of Lorimar that Mr. Karl might have used in the course of fund-raising events? Is that familiar to you at all?

A. In what way would he use a Karl-Lorimar movie? You mean, screen it?

Q. Yeah, uh-huh.

A. Well, there was one fundraiser at some point a while ago that there was a screening that he -- and I believe it was for Gary Hart. In Newport, he rented out a theater and screened something. And I don't remember what it was, though. I guess that's a possibility. That's the only thing I can think of.

Q. But do you recall any of the details of the movie that was screened and how it was procured?

A. No. I don't remember what movie it was or how that worked. But I thought it was the Old Balboa theater in Newport, and it was around March 15th of -- it seemed like it was around his wife's birthday, which happens to be March 15th. And that's about all I remember about it.

Q. Let me show you a letter. This is FEC Exhibit 9. It's a letter from Mr. Karl to a Craig Baumgarten.

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A. Baumgarten, yes.

Q. Baumgarten. Who was he?

A. He was a Lorimar executive, and maybe he still is; I don't know.

Q. Is this familiar to you at all? Does this refresh your recollection at all about it?

A. Yeah, this is it. I remember the date pretty well, too.

(The document referred to was marked Federal Election Commission's Exhibit No. 9 for identification.)

BY MR. BERNSTEIN:

Q. Do you remember how Mr. Karl arranged to use the movie?

A. No. I have no idea. I guess he asked Mr. Baumgarten.

Q. Were you involved in the setting up of that fundraising event?

A. Not too much. I believe Karen Stewart did most of that one. I don't remember doing it. And I don't know who did. I don't remember reserving the theater, arranging for the movie or anything like that. It very well could have been Karen Stewart who did that. She -- I think she kind of liked that, and maybe she

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took that over as a project that time. I don't know. I know I didn't do it, though.

Q. Do you know who paid for the theater, any of the arrangements?

A. No, I have no idea.

Q. Do you remember a time when you might have written a check on Mr. Karl's personal account for the use of the theater?

A. No, I don't. I mean, I could have, but I don't remember writing a check to them.

Q. And do you know what Lorimar's practice was, if anything, for the use of movies of theirs?

A. I have no idea.

Q. Was it ordinarily your assignment to arrange the fundraising events?

A. Yes. The only thing I can think of is at that time there was the Senator Kerry event, and perhaps I was so busy arranging his wife's -- Stuart Karl's wife's birthday and the Senator Kerry event, that perhaps someone else was working on that and that's why I don't recall it.

Q. Were there other instances and fundraisers that you arranged that were paid for out of Mr. Karl's personal account -- expenses?

A. I'm sorry. Can you repeat that, please?

Q. Yes. Were there instances in the fund-raisers that you arranged in which expenses were paid out of Mr. Karl's personal account?

A. Well, they were all paid for by Stuart, as far as I understand. The catering, all of those type of things, the arrangements, it was all paid for by Stuart.

Q. Where did the fundraisers take place?

A. Well, Senator Kerry's was at his house, Stuart Karl's house. Kathleen Kennedy Townsend was at Stuart Karl's house. They were typically catered by the Park Restaurant, Corona Del Mar, which is now a Mexican restaurant. I forget the name of it. He had a fundraiser for Cranston way back when, in early '85, I think. We were still in Newport Beach. It was at the Pacific Club, he was a member of in Newport Beach. And that would just show up on his next bill.

Q. I'm sorry?

A. That would show up on his next bill from the Pacific Club. He got a monthly bill.

Q. Did you pay those bills from his personal account?

A. Yes, unless they were business, if he told me they were business or I recognized them to be business.

800 FOR DEPOS (TOLL FREE IN CALIFORNIA) 800 FOR DEPOS 55 37 57

Q. And do you know which account that was?

A. Which time?

Q. Well, for example, the one you just mentioned, the Cranston one.

Q. The Pacific Club, Cranston? Well, that was back in Newport Beach, so that would have been --

Q. Still the First Interstate?

A. First Interstate, or it could have been Bank of America because it was after the acquisition, I'm sure.

Q. What other fundraisers can you remember?

A. (No response.)

Q. Do you remember a May 1984 fundraiser at the Biltmore Hotel in Los Angeles.

A. For who?

Q. For Gary Hart.

A. At the Biltmore in May? I don't remember Stuart ever paying for something like that, but it sounds familiar.

Tape 8

Q. What other caterers did Mr. Karl use for the fundraisers, if any, besides the Park Restaurant that you mentioned?

A. Well, back in '84, I guess he could have used Gentlemen's Agreement to coordinate the catering. That's a possibility. I'm talking about using the Park

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Restaurant in '85, '86, '87. You know, mostly '86 and '87 is when he used the Park. So, that's a possibility. Plus, back in -- then after Gentlemen's Agreement went under and it became another company called Voila, which was the same company, he could have used that.

Q. Did he use Gentlemen's Agreement during 1983?

A. Well, that was pretty much before me, but I'm sure he did.

Oh, you know -- now, this is something I've heard and it was before my time, but everyone tells me he had a fundraiser in the summer of '83 at his house for Gary Hart, catered by Gentlemen's Agreement.

Q. You heard it through the grapevine?

A. Yeah. I heard all kinds of good stories.

Q. Thanks.

Do you remember a fundraiser for a Mr. Patterson in August of 1984?

A. No. Given by Stuart Karl, you mean?

Q. Yes.

A. No.

Q. And we talked about your contribution in connection with the Bradford campaign?

A. Yes.

Q. Do you remember a reception in October

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of '84 in connection with that?

A. That's a possibility. I mean, I really don't remember it and I certainly didn't attend it myself or I would have remembered it. But--

Q. Do you remember where it was held?

A. No. I don't even know that there was one, but it seems like there was something for her. I really only remember the things I attended myself.

Q. Well, what other ones can you remember that you remember paying expenses for?

A. I think that's it. I don't remember anybody else having a reception or any kind of a party unless you want to refresh my memory.

It seems like he had one other one at the Pacific Club, but I can't think of who it is.

Q. Do I gather, were the events at the Pacific Club always paid -- billed by the Pacific Club to him?

A. Right. So he paid for them after the fact.

Q. Do you remember events that Stuart Karl purchased tickets for?

A. Oh, he purchased a lot of tickets and a lot of dinners and a lot of stuff that he never even went to. I mean, sometimes he'd go to them; a lot of

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times he'd purchase them and not go.

Q. Do you remember any other Hart event in 1984 or early 1985 that Stuart Karl paid the expenses for?

A. That he paid the expenses for? No, not to my knowledge.

Q. And did you say that the Kerry reception in connection with those contributions -- was that held at Mr. Karl's house?

A. Yes.

Q. And do you remember paying the expenses for that?

A. Yes. The catering?

Q. Yes.

A. Let's see. There was a security guard. There was valet parking, and there was catering, and there were flowers and tables and tablecloths, all those things.

Q. Do you recall how much that came to, approximately?

A. And a bar and a bartender. It was very expensive. Between ten and fifteen thousand, perhaps.

Q. And was it our job in the ordinary course to prepare, you know, a tally of how much he had spent for these things?

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A. Well, I kept track of it, but he never asked to look at it, really.

Q. Well, did your knowledge, did he ever send these bills to the various campaigns that he was holding fundraisers for?

A. No. You're talking about as an in-kind contribution. Isn't that what they call it, when you do something like that?

Q. Well, we're trying to find out what activities took place and what monies were spent and that sort of thing.

A. Well, for example, there's his political attorney in San Francisco, which we haven't touched on yet, Barry Fadem. I don't remember ever reporting those receptions to him. I don't think I did.

Q. What things did you report to him?

A. Contributions that Stuart would make, actual checks that were written.

Q. What other things did you report to him?

A. Just that, just monies that were -- Stuart contributed to a lot of -- Almost anyone that sent him something, he'd give them $50, $100. He'd give them something.

Q. Did you ever discuss -- Did you have communications with Mr. Fadem or --

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A. Oh, yes, I had -- I talked to him all the time, you know, when it was time for the reporting.

Q. Did you ever discuss with him or anyone in his office the reimbursement of contributions or the --

A. Oh, no.

Q. -- or the payments that were made to the Hart campaign and that sort of thing?

A. No.

Q. No?

A. No.

Q. Why not?

A. Because Stuart didn't tell me to. If he didn't tell me to do it, I didn't do it. There's an unwritten law with Karl: you did not discuss anything unless he told you to. If you did, you were going to be fired because it's probably something he didn't want you to do. You only did what he asked you to do, nothing more.

Q. Well, did he speak with Mr. Fadem and the company about the rules governing making contributions?

A. Yes.

Q. Do I gather that at some point in having those discussions you must have understood that the re-

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imbursements was outside the ordinary rules of making contributions?

A. Certainly, I discovered that, yes. If it wasn't clear before, it was clear then.

Q. Did Mr. Karl ever say anything to you indicating that he understood that these activities were improper or illegal?

A. Not in so many words, but it was clear that he knew, and he knew that I knew, that it was illegal, very illegal, and that it was not to be discussed.

Q. And that cash was to be used?

A. Yes.

Q. Do you know what the California Major Doner Report was?

A. That's what I'm speaking of when I --

Q. What was that composed of? What did it contain?

A. Well, it would contain all of the contributions that Stuart had made, you know, that year or in the six-month period, depending on how much he had given.

Q. So was that in connection with state candidates?

A. Well, I guess there's two. There's one for all the state candidates, and then there's a federal

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one. I don't know if it's called the same thing, though. But the one I kept track of was the state.

Q. Getting back to the fundraisers, can you remember any other places that fundraisers were held that Mr. Karl sponsored?

A. I think that's all that I'm aware of.

Q. Let me ask you, Ms. Middel, some more general questions, go to a slightly different subject.

What were your principal duties as an executive secretary and then executive assistant to Mr. Karl?

A. Well, when I was first hired, I was -- I answered all of his incoming calls. I placed calls for him. I typed all of his business memos, all of his business letters, all of his personal letters. I was his personal bookkeeper and generally, you know, whatever he needed, business or personal.

Q. What was your salary?

A. When I began? I think it was $1250 a month.

Q. And did that change?

A. Oh, yeah. I got raises.

Q. At regular intervals?

A. Yeah, every three months or something like that.

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Q. Did you have an ordinary work schedule, a forty-hour-a-week work schedule?

A. Well, pretty much until the last, I'd say -- well, it varied, I'd have to say. In the beginning, sometimes I worked until 8:00 or 9:00 at night, coming in at 8:30, because he gave me so much work. You know, some days would be like that. But I was never paid overtime. I mean, I just stayed and did it because I wanted to please him and get ahead. And then it would vary. Sometimes I could work forty hours a week, sometimes I'd work fifty hours a week. Sometimes I took work home.

Q. Can you summarize -- I mean, you told us that at various times you wrote checks on Mr. Karl's personal account for Hart campaign bills. You initiated wire transfers, arranged with the travel agent for rental cars, withdrew cash for contributions and presumably did other less controversial political activities for Mr. Karl.

My question is, at particular times can you approximate the amount of time that you spent on the political activities as opposed to your ordinary work activities?

A. It would vary. You know, it got very involved, obviously, before the Democratic Convention.

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It was a lot of my day sometimes. And when I first started, it wasn't at all. You know, April, May, June leading up to the convention, it was a lot of it.

Q. What was your salary as of the beginning of 1984?

A. Beginning of '84? It was $1250 a month.

Q. And had that changed by the time of the convention?

A. Oh, no, it was the same.

Q. Did you ever -- Did Mr. Karl ever suggest to you that you should make up time outside of working hours for the time you had spent on political activities?

A. No, he did not suggest that. But, as I say, sometimes I worked very late in order to get his memos done, business memos done, because the day had been so full of other things. That happened, you know, on and off.

Q. Did he ever suggest to you or did he ever pay you extra for overtime work on political activities?

A. On occasion he'd give me a bonus.

Q. How frequently was that?

A. Every few months or something. Sometimes he'd give me an extra $100 or $200. He did that with the whole company, too, though. He was just very gen-

erous.

Q. Were there any amounts substantially more than those you just mentioned?

A. No.

Q. Did you understand that the bonuses were related to time you had spent on political activities or --

A. No.

Q. -- were they just general --

A. They were just general bonuses. They were not specific to anything except my work in general.

Q. Can you please make your best estimate about the number of hours that you spent for the period of 1984 on political activities during your work day?

A. I couldn't do that in just a minute here. I'd have to think about that. It was a lot of time during those time periods. I mean, there was just a -- during about three or four months, it was just, you know, a lot. And then it let off when Hart was not nominated.

Q. And then, presumably, you resumed again when you were in the process of arranging the subsequent fundraisers; am I right?

A. Sure. Fundraisers. When a fundraiser came up, then it was -- you know, I was spending time.

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I'd say the worst time for that, though, was during the '84 period. That was when I spent the most time. And I remember then, too, I used to come in also at 6:30 in the morning or something, just to try to get some business things done before the day started so I'd have enough time to get it all done, because I was by myself then. I had no back-up. It was just me, you know.

Q. Did you keep any time records of what you spent your time doing?

A. No.

Q. Did you have any work reports that summarized time you spent on things for Mr. Karl or anyone else?

A. Well, you know, that's interesting. When Steve Bornstein started, I think he made us fill out something like that, where we were supposed to write down what we did all day long. And it was just a real pain for everybody, of course, to have to stop and write down what they were doing. That's the only time I can remember doing that, if those records still exist. I don't know.

Q. For what period did you do that?

A. I don't know. When Steve first started, November or December of '84. He was trying to analyze

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what we were doing, who we were.

Q. Well, I would ask you, Ms. Middel, to try to give some thought to estimating the amount of time that you in fact spent on these activities, if you could.

A. Okay. Sure. I can do that.

Q. Thank you.

You already described to me that you thought Mr. Kantzabedian, in his role as assistant of some sort to Mr. Karl, likely engaged in political activities on his behalf. What other employees during their work day, to your knowledge, worked on such things?

A. I don't think anybody did, except Abraham and myself. At some point, Elizabeth might have, Elizabeth Boughman, when she was a secretary and then even after I came on for a short period of time. She may have. But other than that, I believe it was just Abraham and myself.

Q. For example, you had said you thought that maybe Karen Stewart had been responsible for arranging one of the fundraisers.

A. Right. That's very unusual. And, like I say, she might have. You know, maybe she did. It just seems to me, she did for some reason. She thought

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it sounded like fun, and she said she'd do it. And I said, "Great. Do it." I was always frazzled. I always had so many things to do, I was stressed out.

But typically, I would do it, not anybody else, really.

Q. To your knowledge, did Mr. Herrera -- was he involved in Mr. Karl's political activities?

A. Not really. Just running errands for Stuart, whatever he wantd to have done. I'm sure Eddie would help me arrange, you know, valets, security guards maybe. He might help oversee it while I was still at the office working. He might -- and say the reception was going to start in the afternoon or the evening, like the Kerry reception, he'd leave early, get over there and make sure everything was being set up appropriately and this and that. But he didn't really spend very much time.

Q. Do you know if he ever transported Dennis Walto from time to time?

A. That's possible. I don't really remember.

Q. How about Michael Severy?

A. Mike Severy?

Q. Uh-huh.

A. Did he --

Q. Work on political activities.

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A. As far as arranging planes and helicopters, yes, definitely. That was his job.

Q. Were there any other areas that he worked on, political areas?

A. I don't believe so.

Q. What I'd like to do now, Ms. Middel, is to ask you to describe as exhaustively as you can the names of individuals connected in some fashion with the Hart campaign that, during 1984 or '85, you had contact with or communications with or heard about in any way.

A. That were in the Hart campaign?

Q. Or involved in the Hart campaign.

A. Well, Keith Glaser, Doug Rosen --

Q. Can you tell us about Mr. Rosen's involvement, your understanding of it?

A. I don't know what it was. Doug didn't talk about it in front of me.

Q. What did you know?

A. I just knew that Stuart met him through the Democratic Convention and through Hart, and that he had worked somehow in the Hart campaign. And that's really all I knew. Doug did not talk politics with me much. You know, he didn't talk about what he did or anything.

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Q. Do you know him well?

A. Yeah, I felt like I knew him real well on kind of a personal level. We'd talk about his race horse or what I did last weekend or this and that, but not politics.

Q. Did he spend time at the company's offices?

A. He'd come to visit on occasion, yes.

Q. Do you know if the visits involved political matters, Hart matters?

A. I don't know because he'd go, you know, in Stuart's office and then shut the door, and I wouldn't know.

Q. Did you have an impression whether or not it concerned Hart matters?

A. No, I wasn't sure because Doug had that production company that was involved with the company, with Karl Video, Karl-Lorimar Home Video, and I assumed it could have been the video.

Q. So there were projects that Doug Rosen's company was involved in with --

A. Right. That was when he was in the office a lot. So it wasn't necessarily because of Hart.

Q. Did Mr. Karl meet with Doug Rosen a lot during 1984 in the heat of the campaign?

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A. No, I didn't really -- I don't remember really meeting Doug until around the convention time. I could be wrong, but I don't think I really met him until around that time. The summer of '84 was the first time I remember seeing Doug at all.

Q. Did you participate in any conversations or were you around when he and Mr. Karl had any conversations about the Hart campaign?

A. No.

Q. None at all?

A. No. I eas excluded. They just didn't talk about it in front of me.

Q. So all you really know about him was that he was something -- did something related to the Hart campaign?

A. Right. And that they became friends. And then Doug started a production company and started doing business with Stuart in the video. And the Hart seemed secondary, you know, to that.

Q. Was it your impression that the association began because of the political activities?

A. Yes, definitely.

Q. And that the business relationship came later?

A. Right. It was just something that hap-

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pened. Doug met Stuart, decided video was a great idea, started a company.

Q. What other individuals can you think of?

A. Well, Richard Wagner was someone I talked to from the Hart campaign quite a bit during '85, '86, '87. I'm not quite sure when it began.

Q. Was it at all during the '84 campaign?

A. I don't think so. I don't remember those people during '84. I just don't remember those names.

Q. I'm sorry. Those names?

A. I don't remember the names of those people, the Hart people in the '84 convention, except for Keith. I just don't remember anybody's name. It all happened so fast, and it was all so new to me. I just didn't retain any names.

Q. Well, tell me more about what you knew about Mr. Wagner?

A. Well, Richard Wagner was someone who would call when -- let's see. I think he was the one who would call when he wanted to know if we could arrange a helicopter or a jet or something like that. He called for more than just that, though, but I don't recall, you know, all of our conversations.

Q. What sort of things other than that did he call for?

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A. Like I just said, I really don't remember what else it is that we talked about. We talked quite a bit, and there weren't that many helicopters and planes. I mean, there were some, but, you know, it seemed like I was talking to Richard about every three days, you know. So we were obviously talking about more. Perhaps, you know, just general information I would relay to Stuart about what was happening with Gary Hart. But I talked to Richard Wagner the most.

Q. Did you speak with him about what dennis Walto was doing; do you think?

A. Yeah, I'm sure I did. I also talked to -- well, I'm getting into more '86 here, I think. But I talked to Billy Shore.

Q. Who was he?

A. Oh, I don't know what his title was, but he was -- he was up there in the Hart campaign definitely. He would call about retreats and more important matters than, it seemed, Richard Wagner.

And then at the top of that, kind of like going up in rank here, at the very top of that was Bill Dixon, and he was the -- I talked to him the least, but when he called it was very important and usually went in straight to Stuart.

Q. Now, were you acquainted with Shore during

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the '84 campaign?

A. I don't remember.

Q. And that goes for Wagner, too?

A. Yeah. I don't remember anybody's name.

Q. Now, these were both people who you came to know somewhat later?

A. Right.

Q. Were either of them the individuals who had called you about the checks that you wrote for the convention or about the wire transfer?

A. I don't think so. The man that called about the wire transfer, I don't think I ever talked to him before or since.

Q. Okay. How about the convention checks?

A. I don't know.

Q. Might it have been one of them?

A. I don't know. I just don't know. But there's another man's name I'm trying to remember that I talked to a lot during, like, '85. Boy, I can't think of his name, but I can't think of it. It's like Dwight or something like that.

Q. Dwinelle?

A. Dwinelle. James Dwinelle.

Q. And who was he?

A. I don't know what his title was, either,

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but I talked to him a lot, it seemed, before Richard Wagner. Before Richard Wagner, it seemed like it was James Dwinelle I talked to a lot.

Q. About what?

A. I don't know. It must have been helicopters, planes, different things. Kind of the same things that I probably talked to about Richard -- to Richard about later. And Billy Shore.

Q. Do you have recollection of whether the 1985 activities were related to attempts to retire Mr. Hart's 1984 debts? Do you remember discussions of that?

A. Well, I remember some discussion about the fact that Gary Hart had quite a debt. I mean, but as far as trying -- something to do to try to retire it, I don't remember.

Q. Do you remember fundraisers organized to retire the debt?

A. I don't remember.

Q. Are there any other names you can think of?

A. You just want '84 and '85, or are we moving forward?

Q. You can give me who you like, and then we'll go back.

A. Okay. Well, of course, my best recollec-

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tion is the more recent. There's, you know, Beth Smith, MacKay Daines that were working on the Hart video, that would come to the company.

Q. Was that in '84 at all?

A. No. I never heard their names until '86, '87.

(After a pause) I know I'm forgetting something here, but -- There were other people, but I can't think of their names right now.

Q. What was MacKay Daines' position with the campaign?

A. I don't know what his position was, but I understood he was writing the script of the Hart video.

Q. You know, why don't we -- we sort of got off a little bit, but maybe you can actually tell us briefly what your understanding was about what the Hart video was, when it began and discuss that for a bit.

A. It was very vague. You have to understand that Stuart only told me what he needed to tell me. And so if I didn't pick it up -- you know, and I was much too busy to try and worry about what it was all about.

But there was a book called The New Democracy that Gary Hart wrote. I understood they were going

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to make that into a video, and Stuart was really pushing it, along with Doug Rosen -- was involved. And I believed that they were going to try to have it be a Lorimar video. But it had a lot of problems. It just never seemed to get off the ground.

Q. Do you remember any discussion of a Hart video during the 1984 campaign?

A. No.

Q. When's your first recollection of that arising?

A. Around the time of Dennis Walto is the first time I can really remember that.

Q. Did you -- Strike that.

Was the Hart video treated like ordinary projects that were under development at -- this would have been Karl-Lorimar; is that right?

A. Uh-huh. I don't know. I didn't sit in on those meetings, so I wouldn't know.

Q. Well, do you know what, if any, activities took place to further the project?

A. Well, Beth Smith and MacKay Daines kept flying in from wherever, Denver, Washington, to try to work on the script, and Dennis was doing whatever, if he was helping at all. E-J would come down also to sit in on those meetings.

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Q. Dennis Walto was involved, as well?

A. When he was in town, I think he was, somewhat. E-J. I mean, they really -- they had quite a few meetings where they just kept trying to, you know, work out the problems. But they just didn't go forward with it.

Q. Do you know what the intent of it was? Was it something that was a for-profit enterprise, or what was the intent of it?

A. I have no idea.

Q. It was something that Stuart Karl's people were working on with the Hart campaign people; is that about the extent of your knowledge of it?

A. Yes. And it seemed all out in the open. They were having meetings and everything right there at the company, so it seemed like it was going to be a company project or they were going to make it a company project. But it just seemed like it never got off the ground. It didn't make a whole lot of sense to me.

Q. Do you know what monies were spent in furtherance of the project?

A. I'm not sure, but, boy, they spent a lot of money. I can remember a gentleman named Geno Tanesquieu from L.A. Filmworks calling and saying, "We need

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more money for the project. We need more money for the project." Twenty thousand, thirty thousand.

Q. He called you?

A. Uh-huh. To tell Stuart.

Q. So did anything happen up to that --

A. That was right about the time that everything fell apart, you know, March of '87. So it just fell apart, as far as I know.

Q. But that led you to think that substantial activities had been taken by someone, anyway?

A. Someone had done something. I mean, there's obviously thousands of dollars, maybe up to thirty, forty, fifty thousand poured into it, at least by way of L.A. Filmworks, and they wanted more. I don't think they ever got it.

Q. Ms. Middel, I think you said, did you not, that you don't recall any Hart video related activities during the '84 campaign; is that right?

A. Right.

Q. Would I assume correctly, then, that the compilation that you did of all of the various monies that had been spent for the Hart campaign, did that compilation include anything for production or Hart video or anything like that?

A. No, I don't think so. There wasn't any-

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thing like that then.

Q. So your best recollection is that it was a compilation of all the things we discussed: the wire transfers, the checks, the rental car and that sort of thing?

A. Right.

Q. Do I assume, by the way, although I earlier said we're going to get to the subject and I'm hopeful we still will -- did that compilation, to your knowledge, include any of the various air transportation that may have taken place? Do you remember?

A. I don't think it did. It's possible, but I don't think so.

Q. Okay. What I'd like to do is go back to discussing the Committee people that you had dealings with. Can you remember anyone else?

A. With the Hart campaign?

Q. Yes.

A. I really can't think of any more names right now. I think that's pretty much it, the names that I can recall.

Q. What did you understand Beth Smith's position was?

A. That she was helping to organize the Hart video.

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Q. Did you know who Steven Alfers was?

A. No.

Q. How about Patrick Caddel?

A. That's a familiar name. I don't know who it is. I definitely heard that name before. He probably has called or something.

Q. How about Sue Casey?

A. No.

Q. How about Michael Cheroutes, C-h-e-r-o-u-t-e-s?

A. I don't know.

Q. How about Kenton Granger?

A. Never heard of it.

Q. How about Oliver Hinkel?

A. No.

Q. Michael Moore?

A. Michael Moore sounds familiar, but I don't know why.

Q. How about Bernard Schneider?

A. Bernie Schnieder? I know Bernie Schneider.

Q. Who was Bernie Schneider?

A. Bernie Schneider is a lawyer for Buckhalter, Niemer, Fields & Younger (phonetic) in Newport Beach. He is a friend of Stuart's and a Gary Hart sup-

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porter and a Democrat.

Q. Well, to your knowledge, what was his involvement in the 1984 Hart campaign?

A. I don't know.

Q. Do you know if he spoke with Stuart or met with Stuart about the 1984 campaign?

A. I don't know.

Q. How do you come to know him, then?

A. Well, his -- yeah, let me clarify that. His name and David Stein's name, those are familiar names. At that time, they would call. There might even have been some meetings or, you know -- they were involved with the Hart --

Q. We're talking about during the '84 campaign?

A. Right. And there was even one time Stuart couldn't go to a political meeting that was at a gentleman's office named Harvey Englander in Newport Beach. And I'm trying to think of who was there. Chris Townsend, who works for David Stein. Maybe Bernie Schneider was there, and a couple of other gentlemen. Stuart couldn't go and I went in his place. I was the only female there. And I didn't know very much about politics, so I was pretty uncomfortable. But I just sat in and took notes about what they were discussing, which

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I can't even remember what it was.

Q. Was it related to the Hart campaign?

A. Oh, it was definitely a Hart meeting. But at that time, for me, it was just over my head. I didn't know what they were talking about.

Q. Do you remember general topics they were discussing?

A. No, nothing comes to mind. I was so nervous. Words were coming out of their mouth and I wasn't even understanding what they were saying. So I thought, what am I doing here? I don't belong here.

Q. When was this?

A. It was in -- it was right around the time period, you know, around April, May, June, probably more like March, April, May of '84.

Q. Did they discuss fundraising?

A. They could have. Like I say, I don't remember a thing that they really talked about.

Q. You took notes, though?

A. Yeah, I took some notes. I managed to write some things down that they were talking about, but I don't remember what it was.

Q. Did they discuss the reimbursement of contributions?

A. Oh, no. I would have remembered something

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like that. I'm sure they did not. Totally above-board kind of a meeting.

Q. You mentioned the name of Chris Townsend. Who was he?

A. He works for David Stein at Stein Brief in Laguna Niguel.

Q. To your knowledge, does he have an involvement in the Hart campaign?

A. Yes.

Q. What, to your knowledge, was his involvement in the Hart campaign?

A. I don't know. Just that he -- David Stein was involved, so Chris Townsend was involved, naturally, working for David Stein.

Q. Oh. Your understanding is that Mr. Townsend was involved in the Hart campaign because Mr. Stein was?

A. Yes. Not quite like in my capacity as working for Stuart. I think Chris was more involved, definitely more involved. And I think Chris headed up -- there was some kind of an organization called -- oh, boy, I forget what it's called -- Young Democrats or Democratic Association. They have these little get-togethers and things. And Chris always organized that. He was always trying to get me to join it.

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Q. Well, was he someone who you spoke with during the campaign about Hart Committee various needs?

A. No, I don't remember -- I don't remember talking to Chris very much until -- well, yeah, I must have talked to him a few times because I remember meeting him at a Tom Hayden fundraiser in the fall of '84. And I recognized him at that fundraiser, so I must have already met him. So I must have been talking to him somewhat, but I don't recall.

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Q. Do you know if he had any official capacity with the campaign?

A. No, I don't know.

(Pause)

Q. What I'm handing you now, Ms. Middel, is a handwritten note that seems to be an agenda for a meeting --

A. Executive staff meeting.

Q. What can you tell us about that note? Do you recognize the handwriting, for example?

A. No, I do not recognize this handwriting.

Q. Does it look to you to be Mr. Karl's handwriting or not?

A. No, it's too neat. It's not his handwriting.

Q. No. 3 listed there reads "Political Cam-

paigns," and it says "G. Hart," and it's dated December 1986.

A. Uh-huh.

Q. Do you remember attending a meeting like this?

A. No, I never attended executive staff except to take the minutes for it. And after that, Karen Stewart -- at this time, she was taking minutes. This possibly could be her handwriting, although I don't remember her handwriting.

Q. So at the point of December '86, who would have attended executive staff meetings?

A. All of the vice presidents of the different departments, Stuart Karl, Court Shannon, Gary Hunt, E-J Oshins, Pierre Loubet, Rob Bonham if he was -- yeah, I guess he would have been there -- Mark Lambert if he was still there, Steve Bornstein, John Lutgens, people in those positions. Those are basically the people.

Q. But this isn't your handwriting, obviously?

A. No. And I really have to say, I think it would be Karen Stewart's, although she was responsible for making up the agenda for the executive staff. So she took on the minutes and making up the agenda, which is what I did before she came. And she started

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doing it. It could be that she at the last minute did it and just handwrote it instead of typed it.

Q. Okay. Thank you.

(The document referred to was marked Federal Election Commission's Exhibit No. 10 for identification.)

BY MR. BERNSTEIN:

Q. Ms. Middel, is there anything else you can tell us about Stuart Karl's political activities in connection with Senator Hart's campaign, both '84 and '86? And, again, momentarily at least I ask you to leave aside the matter of the air transportation.

A. Not that I can think of right now.

Q. Are there any other political activities or instances of monies paid by Mr. Karl or the company in connection with political campaigns, federal campaigns, that you can think of?

A. No.

Q. I'm handing you now Exhibit 11, which is a several-paged document starting with a memo that's written from you to Mr. Lutgens on Karl-Lorimar stationery.

A. Right. I remember this.

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(The document referred to was marked Federal Election Commission's Exhibit No. 11 for identification.)

BY MR. BERNSTEIN:

Q. I wonder if you could take a couple minutes to look through it and then --

A. I know what this is. Is this considered political? I thought it was for cleaning up the water or the air or something, Toxics Initiative. Oh, but there's all kinds of political people involved.

Yeah, I remember this real well. $25,000.

Q. Well, tell us about it.

A. Well, Stuart wanted to contribute to this. He met with Barbra Streisand at her home on a Saturday long before this and talked to her about it. At least, I think it was before. It could have been after, but I think it was before. He was very interested in helping her, this and that. So he needed the $25,000 -- he wanted to give the whole $25,000 for this, although I understand other people didn't pay that much. And so he -- Can I read this for a second?

Q. Yes. Please take your time.

A. Yeah. So he wanted Karl-Lorimar to pay for it. His reasons stated here, that Karl-Lorimar

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will be able to obtain the video rights to the Barbra Streisand/Robin Williams concert, which I don't think they ever did. So he -- this is how he got a check, you know, from the company to pay for this event.

Q. Why did he want the company to pay for it?

A. Well, because he didn't have $25,000 at the time.

Q. He didn't?

A. Well, he didn't want to spend it, anyway, on that. If there was any way he thought he could, you know, get the company to pay for anything, then he would do that. So this, you know, this memo was to support that so that it was just $25,000 less he had to come up with.

Q. Did you ever discuss this matter with Mr. Lutgens, to whom you sent this memo?

A. Verbally discuss it with him?

Q. Yeah.

A. I don't remember. But I do -- I do remember having a conversation with -- for the Major Donor Statement, with the lawyer said -- and this was sometime after this -- he said, "You must have Stuart reimburse the company. He cannot take the company money for this. I don't care how he did it. He should not do that."

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And I told Stuart that. And I don't remember if he paid it back, but I don't believe he did.

Q. I'm sorry. When did you get this advice, and from whom?

A. I'm not sure, but it was a few months after this, whenver I had to prepare the next Major Donor Statement. And the political lawyer, who at that time I was talking to Peter Bagatellos, he said, "You must tell Stuart to reimburse the company. He cannot do this."

Q. Was that the first indication you had that there was any impropriety about the way this transaction was structured?

A. Well, when it said -- when the invitation says, "Contributions from corporations are prohibited by federal law," but he gets around it, I wasn't too sure. But, you know, I just -- I figured if all these people were going along with it, it must be okay. I didn't know. But when I --

Q. I'm sorry. All what people?

A. Well, Stuart, John Lutgens, whoever signed the check. I mean, I guess it sounded good. But when it came right down to it, the political lawyer -- and I wasn't sure. But when I told him, though, he told me, yeah, you know, "He can't do that." So I said,

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"Oh, okay. I'll tell him." And I did.

Q. Now, this would have come, am I right, if this was in August of 1986, this would have come after the Carter reimbursements in May of '86; right?

A. Right.

Q. And before, I suppose, the Townsend contributions, whatever they were, reimbursed or not?

A. Right.

Q. In September 1986.

A. Right.

Q. Did you discuss this with anyone else in the company?

A. This with anyone else in the company?

Q. At that time.

A. At that time? I don't think so.

Q. And I think I asked you before, did you have any communicatiosn with Mr. Lutgens about it?

A. I don't remember if I spoke to him about it. You know, I can't remember if he hesitated or if he went right along it or if we discussed the check. The date of check would be interesting. The check's dated before my memo -- oh, no, the day after my memo. It didn't take very long. So, one day after the memo the check is cut. I really don't -- Of course, you know, when I typed this memo, it was dictated to me

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by Stuart, you know, what to say.

Q. This memo was dictated to you by Mr. Karl?

A. Yeah. He told me what I should say. I would have never been able to make that up. He told me that I should --

Q. Why was the memo written from you? Why not from Mr. Karl himself?

A. I don't know. I guess he wanted to make it look like it was my idea. He just told me, "You type a memo to Joh and say this -- and this is what you say."

Q. Now, do I gather than an expenditure of this magnitude would not have required any sort of approval by Lorimar itself?

A. I don't think so. I think that's under the limit, $25,000. I'm sure Lorimar didn't know about this.

Q. Ms. Middel, do I gather that at the same time as you sent the memo, or shortly before, the last page is a check requisition form --

A. Uh-huh.

Q. Is that the sort of thing you'd ordinarily use for -- to ask for company checks for things?

A. Right, a check requisition. Yeah, and this is approved by John.

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Q. And that's Mr. Lutgen's signature?

A. Right.

Q. Is there any indication that Ms. Bramnick had any involvement in this, or do you remember her having any involvement in this?

A. Oh, I don'tknow that she had any involvement in it. I don't know. At that point, I don't know what -- if she had -- It probably was a manual check, though, so I suppose she would. I don't know, though. But it's computerized. I don't know.

By then, the company had grown so much, I don't know what -- how Cathy was involved was involved with this.

(Pause)

Q. Ms. Middel, turning briefly to transportation, which you alluded to now on more than one occasion, please tell us what that involved.

A. Well, someone from the Hart campaign would call and ask if we could arrange helicopters and/or a private jet for Senator Hart. And this happened in -- you know, I can't remember the dates specifically, but I know that it happened in '84, '85, '86.

Q. Do you remember, was it -- did it happen during the '84 campaign?

A. I really don't know. I'm sure I got a

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private jet for Stuart, and then it's possible it was also used by Hart or maybe some of the Hart people. It's possible, but I don't remember. There's very few I can really specifically remember happening.

But I would arrange these things myself. And then when Mike Severy was hired, he would arrange them after that point. And they were typically arranged through Martin Aviation.

Q. What did you actually do when it was your job to arrange them?

A. I would call Mike Severy. He worked at Martin Aviation before he came to work for Karl-Lorimar. I would call him and tell him what we needed, and Mike would arrange it.

Q. Did you inform him of the destinations?

A. Oh, everything, everything.

Q. The passengers?

A. Everything. He had the -- it's federal law or something. You have to have all that. You can't even set it up without names and everything, you know. You can't take off without the names.

Q. Well, try to tell as specifically as you can the instances that you had just described generally, of when Senator Hart was transported, you thought.

A. I can remember him flying into LAX at

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one point. And Mike Severy was working at Martin, and Mike always personally handled Gary Hart. He really admired him and liked him. So if there was a helicopter, Mike would land, and he'd walk over to the American Airlines terminal and just personally whisk, you know, Gary Hart away and take him and just personally take care of him, if it was a helicopter or a jet. And he'd do the same when he came to work for Karl-Lorimar. In other words, Gary Hart wouldn't have to try to find the helicopter. He would just be taken to it an taken care of.

Q. Were the purposes of these trips ever discussed?

A. Well, he was on his way to make a speech or something, you know, political, as far as I understood.

Q. Why did Mr. Karl -- Strike that.

Who paid for these trips?

A. Stuart Karl.

Q. From his personal account?

A. At that time, from his personal account, yeah. I mean, later on, I think that they -- I'm getting really tired. Later on in the year, I think Richard Wagner was the one who called and said, "Well, we have to do some kind of memo on these trips to substan-

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tiate it and to file it legally." And I think something was done at that point, but it wasn't done at that time. At that time, the bill came, Stuart paid for it. You know, we never got money from anybody else to pay for it. He did.

Q. Are you suggesting that bills were sent at one point to somebody?

A. It's possible. I remember Richard Wagner or someone -- it could have been James Dwinell -- one of those gentlemen calling and saying, "We need an accounting of this," and calling me for several days and really on me to do it, do it, get the dates, get what was done, please. "We need this information in memo form."

Q. And when was that? What's your best recollection?

A. I don't know. I think it was kind of an end-of-the-year thing, though, like in December or something.

Q. The end of the year in 1985 or 1986?

A. Probably was both. You know, it was at least once.

Q. Well, what I'd like to show you -- I am handing you FEC Exhibit No. 12. Please have a look at it. Take as much time as you need. It's a three-

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page document, the first page of which appears to be a memo "From the Desk of Rama White." That was you; right?

A. That's me.

Q. And the next two pages are short memos which purport to be invoices. Just have a look at them.

(The documents referred to were marked Federal Election Commission's Exhibit No. 12 for identification.)

THE WITNESS: This is exactly what I was talking about. Richard Wagner calling, asking for the flight information. Of course, when he called, it was April, but what's a few months?

Yeah. And this is it. He's dictating to me, this is what I need to type and, you know, I need --

BY MR. BERNSTEIN:

Q. Who dictated this to you?

A. Well, Richard Wagner, when he called, told me, "This is how you have to do it." I mean, he pretty much told me, "This is how you have to do it." He explained to me how to do it, and I did it according to what he said.

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Q. Are you suggesting that the typewritten memos that are pages -- the second and third page of this, was essentially dictated to you by Mr. Wagner?

A. Well, no, it wasn't dictated to me, because I had to find out the itinerary. He didn't really remember what it was. I had to look all this up myself.

Q. Well, what exactly did he ask you?

A. He said, "You have to send us a bill on Stuart's personal stationery showing what he did for Gary Hart and how much it cost and what the itinerary was. Make up some invoice number on it." And that's what I did.

Q. And did he indicate for what period you were to do this, what period of time? From when until when?

A. I don't remember. I mean, I see there's only two here, but yet I listed a lot more than that. I don't remember.

Q. Well, how did you go about compiling the list?

A. Oh, I would go through the old Martin Aviation invoices, and Mike Severy would help me.

Q. Well, this looks to be -- if I'm looking at the first page, which is your memo, the first entry is 4/28, April 28th, and I would infer that's 1985.

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A. Uh-huh.

Q. Can you explain why you would have begun at that time and not earlier?

A. Maybe that was the first one of the year; maybe there wasn't anything else.

Q. Can I ask you, the invoice that is labeled No. 1, for transportation to Fresno on 6/22/85, and the cost indicated there is $360. On the first page, your entry of 6/22/85, "Falcon, SF to Fresno," the amount there seems to be $5,751.

A. Yeah, it does; doesn't it?

Q. Yeah. Do you have a recollection of what accounts for the difference between that figure and the one in the invoice?

A. The only thing I can think of is that he had me find out what a first-class, round-trip regular airfare ticket would be. That's the only thing I think it could be. And I do recall doing that.

Q. Do you think that probably he asked you to do that?

A. Yes, I'm pretty sure. Yeah, it is quite different.

Q. Do you remember preparing more such invoices like this? Did you or not?

A. Well, it seems like I must have, because

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two is not enough. I wouldn't have done all -- It wouldn't have been so difficult for me to do if it were only two, because it -- see, in here, you know, "We have already discussed" -- exclamation points, like he's bugging me. And it's taking me time to find this. It's difficult to retrace it and come up with it.

Q. Well, were these invoices ever sent out?

A. Oh, yeah. It's just that they -- Stuart flew private constantly. You have to understand that there was just a stack of invoices from Martin Aviation, all kinds of invoices, company and personal. It took a while to find. Sometimes at the bottom of the invoice, they didn't put who was on the airplane, and then I'd have to call up and ask Mike, "Listen, there's this trip. There's no names on here. I'm looking for Hart trips. What do you have?" "Well, I'll call you back." It could take a long time.

Q. Well, my question is, the invoices that -- I think I understood you to say you actually prepared these, pages two and three of -- you actually typed these?

A. Uh-huh. I typed it.

Q. My question is, did you send these out?

A. Did I send these?

Q. Yeah.

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A. Oh, sure I did.

Q. Who did you send them to?

A. Richard Wagner.

Q. At what address?

A. Oh, I don't know, wherever he was. He usually was in Denver, I think, maybe Washington -- one or the other, at the Gary Hart office.

Q. But I guess you understood you were sending this to Americans With Hart in the name of Gary Hart's 1984 campaign; is that correct?

A. Right. Richard Wagner was calling for these. This is what he needed.

Q. So do you know whether you sent out additional ones, or you infer that you must have prepared more?

A. I must have. Otherwise, it wouldn't have been so difficult for me. I remember this being a real headache. And I'm looking at the bottom here. I don't -- well, I think that's my handwriting, too, just different pens. Yeah, it's all my handwriting. So, yeah, I must have. I can't say for sure that I did, but I must have because it was much more difficult than just typing two invoices, unless he finally decided that that's all he wanted.

Q. Did you have a further communication with

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Mr. Wagner about this subject?

A. After this?

Q. Yes.

A. Oh, once he got his memos, he left me alone. I remember that. He was just bugging me to do this at this time. But of course I always talked to Richard Wagner, you know, right up until I didn't work up there anymore.

Q. Do you remember ever receiving any sort of acknowledgment from Americans With Hart about these invoices, acknowledgment that they had received them?

A. No. But they must have because Richard didn't bug me for them anymore. So I'm sure that he got them. It was very important. He had some deadline he had to have them by, some kind of filing.

Q. To your knowledge, did Mr. Karl or the company ever receive a payment on the invoices?

A. I don't remember. A very insignificant amount for Stuart, so I wouldn't remember.

Q. Did you engage in this exercise again at a later time?

A. I don't think so because this was in '86.

Q. Right. This was, apparently, in April of '86 that you filed that; is that right?

A. Right. And I might have, but I don't

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remember. I just don't remember.

MR. MICHAELSON: Can I interject for a second? How long are you going to be going, because I do have to leave. It's now about -- it's past 5:30.

MR. BERNSTEIN: Off the record for a second.

(Discussion off the record.)

MR. BERNSTEIN: On the record.

I just explained to Mr. Michaelson that we are shortly to close.

BY MR. BERNSTEIN:

Q. Ms. Middel, I am handing you FEC Exhibit No. 13, which is a Martin Aviation invoice. Is that familiar to you?

A. Yes. It's a Martin Aviation invoice, and it has my handwriting at the top.

(The document referred to was marked Federal Election Commission's Exhibit No. 13 for identification.)

THE WITNESS: (After a pause) And the itinerary is Orange County to San Francisco to LAX and back to Orange County.

BY MR. BERNSTEIN:

Q. Yes. It indicates down below in the

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Comments that -- do I gather "PAXS" is passengers?

A. Yes.

Q. Mr. and Mrs. Stuart Karl, Senator Gary Hart, Richard Wagner, Bill Shore.

A. Yes.

Q. Do you know what this trip involved?

A. No, I don't remember.

Q. I wonder if you can explain to us the handwritten notes that appear in the upper portion of that?

A. Oh, that doesn't have anything to do with this invoice. But what I wrote was that was Stuart's total that he owed to Martin at that time for everything, not just this invoice, but for other invoices, personal, and that Stuart authorized me to put $10,000 on American Express. In other words, Martin Aviation could make out an American Express charge for $10,000 to pay down the seventeen-seven-thirty-two, making his new balance, $7,732.

Q. Is that your writing in the further upper right, which seems to say, "Gary Hart, SFO-LAX"?

A. Right.

Q. For what purpose would you have made that notation?

A. That probably meant that Gary was picked

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up in San Francisco and brought to LAX and that he wasn't on the other parts of the trip. He was only on the San Francisco to LAX. He was not in Orange County.

Q. Can you tell us, were -- Strike that.

Was Mr. Karl's American Express card used for all payments to Martin Aviation?

A. No, just sometimes.

Q. What other source of funds were used?

A. Oh, I'd write a check.

Q. A check on --

A. His personal checking account.

Q. Which, again, depending on the time frame, would be either First Interstate or --

A. Western Empire Savings and Loan or possibly Bank of America.

Q. Do you recognize above on the upper left hand, it says, "Karl Home Video," and then above that, it says, "K12-04." Do you know what that means?

A. That's probably Karl Home Video's account number. Martin Aviation has given them that account number. That's all it means to me.

Q. This was in October of 1985 when the name of the business was Karl-Lorimar Home Video; is that right?

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A. Right. Well, some of these companies never got it straight. They always put the wrong name on there. You know, you tell them to change it and they just didn't do it.

Q. Do you know how many accounts, if any, Mr. Karl had with Martin Aviation?

A. How many accounts?

Q. Oh --

Q. Was there more than one?

A. No.

Q. Just one?

A. Yeah.

MR. BERNSTEIN: All right. Off the record for a minute.

(Discussion off the record.)

MR. BERNSTEIN: On the record.

We have now asked all the questions which we're going to now. In order to accommodate the desires of various people, Ms. Middel to take a breather and try to regain her freshness, etc., and Mr. Michaelson to accommodate his schedule, at this point we are going to adjourn the deposition with the expectation that we will resume it for further questions at a later stage. And we will provide you with sufficient notice of that date and time to accommodate your needs.

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MR. MICHAELSON: Yes. May I request --

MR. BERNSTEIN: Wait. I would also like to remind you that, under the Federal Election Campaign Act, the Commission's investigations are confidential and that no notification or other notice should be given of this investigation.

What were you going to say, Mr. Michaelson?

MR. MICHAELSON: I was just going to ask that it might be best, if possible, to contact me and I can work with you and Rama to set up a suitable date.

MR. BERNSTEIN: Yes. I anticipate, as I said, that we will provide sufficient notice so that scheduling will not be a problem.

Otherwise, I understand, Ms. Middel, that you are going to make your best attempt to try to estimate or detail the tie that you spent on the various political activities during your working hours.

THE WITNESS: Yes.

MR. BERNSTEIN: And we would appreciate it if you could get that to us in some form.

Mr. Michaelson, I leave to you the --

MR. MICHAELSON: You want to have an actual record of this?

MR. BERNSTEIN: Yes.

MR. MICHAELSON: Is that something that

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you are capable of doing, do you think?

THE WITNESS: I'm not sure, but I'm going to sit down and really think about it and --

MR. BERNSTEIN: Yes, please do.

And, Mr. Michaelson, feel free to contact me if there are questions you have about the form in which the --

THE WITNESS: What time period are we speaking of, though? Just the '84 time or for my whole employment?

MR. BERNSTEIN: We would primarily be interested in the '84 time since it appears that the heat of the activity was then, although we are very much interested in the question of how much time comparably was taken by the arrangement for all of these subsequent fund raisers and please try to give attention to those, as well. That is over a longer period of time, but give it your best shot.

THE WITNESS: Okay.

MR. BERNSTEIN: All right.

With that in mind, we will now go off the record to be resumed at a future date.

(Thereupon, at 5:42 p.m., the deposition was adjourned sine die.)

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STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I, Harry Attmore, a Notary Public for the State of California, certify:

At the time and place therein set forth in the foregoing transcript, the witness, Rama Louise Middel was put on oath by me.

IN WITNESS WHEREOF, I have subscribed my name and affixed my seal this 27th day of April, 1988.

Harry Attmore

NOTARY PUBLIC IN AND FOR THE STATE OF CALIFORNIA

OFFICIAL SEAL
HARRY ATTMORE
NOTARY PUBLIC - CALIFORNIA
LOS ANGELES COUNTY
My Comm. Expires Nov 6, 1989

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To The Witness

This proceeding is known as a deposition. The person transcribing the proceeding is a Certified Shorthand Reporter, who is also a Notary Public and has placed you under oath. During the course of this proceeding I, and perhaps other of the counsel present here today, will be asking you questions pertaining to this matter.

Although this proceeding is being held in an informal atmosphere, since you have been placed under oath, your testimony here today has the same force and effect and is subject to the same penalties as if you were testifying in a courtroom before a judge. Specifically, you are subject to the penalty of perjury. Perjury is defined as "willfully, and contrary to an oath administered, stating as true any material fact which one knows to be false." You are advised that an unqualified statement of that which you do not know to be true is equivalent to a statement of that which you know to be false.

If, at any time during the deposition, you feel that a question is ambiguous, that you are unable to understand a question, or you fail to hear the question for any reason whatsoever, please tell the person asking you the question. If you do not so indicate, it will be presumed that you have heard and have understood each question and that your answer to each question is based upon your complete and full understanding thereof. If, after a question has been posed to you, you have any question yourself relating to what has been inquired about,

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Exhibit A 1
witness: MIDDEL
4/27/88
Los Angeles
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please tell the person who posed the question before you answer the question.

The reporter is only able to transcribe audible responses, so please do not nod your head, shake your head, or say "ahha, haah." Further, the reporter can usually record the words of only one person speaking at a time, so plese allow time for the questions to be completed before you respond. You will normally be allowed to finish each and every answer before a new question is posed.

At the conclusion of this deposition, the reporter will transcribe these proceedings into a booklet form, and you will have an opportunity to read that booklet and make any changes in your testimony that you feel are necessary. However, if you do make changes in your testimony, as it is given here today, I will be entitled to ask you why you made such changes. Because of that fact, it is important that all of your answers be full, complete and correct.

If I ask you about any conversations you have had in the past and you are unable to recall the exact words used in the conversation, you may state that you are unable to recall those exact words and then you may give me the gist or substance of any such conversation, to the best of your recollection. If you recall only part of a conversation or only part of an event, you are requested to give me your best recollection of those events or parts of conversation that you recall. If I ask you whether you have any information upon a particular subject, and you have

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overheard other persons conversing with each other regarding it or have seen correspondence or documentation regarding it, please tell me that you have such information and indicate the source, either a conversation or documentation or otherwise, from which you derived such knowledge. In answering, please do not be concerned with whether or not your answer is hearsay or concern yourself with any technical rules of evidence you think may preclude answering.

Our purpose here today is not to trap you or to trick you in any manner, but simply to ascertain and discover that information about the facts concerning this investigation that you have within your knowledge.

At the conclusion of this deposition, the attorneys present may, by agreement, stipulate that you sign the booklet containing your testimony in the presence of any notary public, rather than the reporter who is here today, taking and transcribing this deposition. If we do so agree, it will be upon the expressed understanding, and your promise, that you will, upon receipt of this deposition, promptly and as expeditiously as possible, read it, correct it if you feel necessary, and sign it in the presence of a notary public and return it to the office from which it was sent to you.

Do you understand everything that you have just read?

Yes X No _____

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Do you have any questions pertaining to either the procedure or what is about to transpire, insofar as this deposition is concerned? If so, please ask them now of me.

Please indicate that you have read and understand all of the foregoing, by signing this document where indicated below.

Roma L. Middel
Signature of Deponent

Exhibit 1 to the deposition of Roma Middel,
taken on April 27, 1988.

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AFFIDAVIT OF RAMA MIDDEL

STATE OF CALIFORNIA)
)ss.
COUNTY OF LOS ANGELES)

RAMA MIDDEL, being first duly sworn, deposes and says:

1. I am providing this affidavit in connection with an investigation by the Federal Election Commission (hereinafter "FEC"). I am providing it freely and voluntarily, without threat or promise, at the request of attorneys for Lorimar Home Video, Inc., and Lorimar Telepictures Corporation. It is based on information known personally to me unless indicated otherwise. If called as a witness in any proceeding I would testify under oath to the contents of this affidavit.

2. In October, 1983, I was hired by Stuart Karl as his personal secretary at Karl Home Video (hereinafter "KHV"). I continued to work for and report to Mr. Karl when Lorimar Telepictures Corporation (hereinafter "LTC") purchased the assets of KHV in October, 1984. The business then became Karl Lorimar Home Video, Inc. (hereinafter "KLHV"). I was terminated from KLHV in March, 1987, when Mr. Karl and certain others were terminated by LTC because of conflicts of interest caused by Mr. Karl having hidden interests in and benefitting from one or more companies that did business with KLHV. When I was terminated from KLHV I continued to work for Mr. Karl at another business until September, 1987.

3. During the entire time I worked for Mr. Karl I was his business and personal secretary. In addition to answering phones and performing routine secretarial functions, I was

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EXHIBIT 2
W. MIDDEL
MUR 2583
4/27/88

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responsible for many of Mr. Karls' personal matters, including social, business, financial and political matters. I was a signatory on his bank accounts, paid his personal bills, and made his bank deposits.

4. I was paid a salary by KHV and later by KLHV. In addition, at times, I was paid from personal funds of Mr. Karl for spending extra time working on Mr. Karl's personal matters.

5. At all times, Mr. Karl had the authority to fire or demote me. He was always very demanding and intimidating. He was not tolerant of anyone who questioned his instructions or disagreed with him. There were several instances when people did not willingly do what he wanted and they were berated, demoted, or fired.

6. Conduit Contributions:

a. I am aware that certain employees at KHV and KLHV made political contributions at the request of Mr. Karl. His requests were made directly in some instances and through me in other instances. Whenever I requested employees of KHV or KLHV to make contributions, it was at the direction of Mr. Karl.

b. In some instances the KHV or KLHV employees made the contributions from their own funds and were not reimbursed by anyone. In other instances they were reimbursed in cash by me. Whenever they were reimbursed by me it was done at Mr. Karl's direction. The money for reimbursements came from cash I withdrew from Mr. Karl's personal bank accounts at Mr. Karl's direction. It did not come from KHV or KLHV accounts.

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7. Dennis Walto:

a. In June, 1986, Mr. Karl was actively involved in the presidential campaign of Senator Gary Hart. He hired Mr. Walto to work on behalf of Senator Hart.

b. I recall that Mr. Karl had a meeting, possibly a luncheon meeting, with Mr. Walto. The introduction to Mr. Walto and the meeting may have been arranged by Doug Rosen. After that meeting, Mr. Karl told me he was going to hire Mr. Walto to do things on behalf of Sen. Hart that Mr. Karl did not have time to do. Mr. Karl said that Mr. Walto would travel for Sen. Hart.

c. Mr. Karl told me he would put Mr. Walto on the KLHV payroll. He would be paid $3,000 per month and given a car. Mr. Walto was given the use of a KLHV leased Ford Bronco.

d. Mr. Karl told me that Mr. Walto could do work for KLHV while on the road with Sen. Hart. Mr. Karl said Mr. Walto could visit retail video stores to see if KLHV products were there, to talk to customers, etc. However, I am not aware of anything that Mr. Walto actually did for KLHV. I never saw or heard any marketing reports, production reports, or other reports from Mr. Walto that I can recall.

e. Mr. Walto was out of the office regularly. He would be gone for ten days to two weeks at a time. He would call in and report to Mr. Karl almost daily. He called on Mr. Karl's private line. When I took messages from Mr. Walto, they always dealt with where he was and who he was seeing in connection with

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political activities. He never reported anything through me that related to the video business.

f. I believe that Mr. Walto's travel expenses were paid by cash advanced to him by Mr. Karl or were prepaid through a travel agency. There were some expense reimbursements from KLHV and some from Mr. Karl's personal funds.

g. Mr. Karl told me that he did not want everyone to know what Mr. Walto did. Mr. Walto only reported to Mr. Karl and me. I did not tell other employees what Mr. Walto's activities were. I am not aware of others at KLHV who knew what Mr. Walto did. I believed then and now that if I had reported this matter to others at KLHV or LTC, I would have been terminated or demoted for being disloyal to Mr. Karl.

h. In approximately December, 1986, Mr. Karl told me to get Mr. Walto out of KLHV and put him on the payroll of Complete Productions.

i. Complete Productions was a company run by Alison Weir, a family friend of Mr. Karl. I understand that Mr. Karl secretly owned Complete Productions. Complete Productions did business with and received money from KLHV. I know that Mr. Karl received money from Complete Productions, because I deposited it into his personal accounts.

j. After being taken off the KLHV payroll, Mr. Walto continued to do the same things, traveling for Sen. Hart and reporting to Mr. Karl. Mr. Walto stopped driving the Ford Bronco and drove a Chevrolet Cavalier leased by Mr. Karl. Ms. Weir asked

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me for money from Mr. Karl or KLHV for Complete Productions so she could pay Mr. Walto.

k. Sometime in March, 1987, Mr. Karl told me to tell Mr. Walto that he could not afford him anymore and he was taken off the payroll of Complete Productions. At that time LTC was investigating Mr. Karl for conflicts of interest relating to Mr. Karl's hidden interests in companies doing business with KLHV. Shortly after, Mr. Karl and I were terminated by LTC.

8. 1984 Campaign/Wire Transfers, Furniture Sale-Leaseback/Convention Payments

a. Mr. Karl was actively involved in Sen. Hart's 1984 presidential campaign. At that time the business operated as Mr. Karl's business, KHV, and LTC was not involved.

b. In approximately June, 1984, someone with Mr. Hart's campaign called and wanted Mr. Karl to wire-transfer some money that day to cover, as far as I understood, some campaign costs. It involved thousands of dollars. Mr. Karl told me to make the arrangements. I received the wire transfer information and gave it to Cathy Bramnick, who worked in accounting and handled the KHV bank accounts, as opposed to Mr. Karl's personal accounts which I handled. There may have been more than one such wire transfer.

c. Again in 1984, sometime in June, a Sen. Hart campaign person called Mr. Karl. Afterward, Mr. Karl told me to send them checks on his personal account to pay campaign expenses. I wrote and sent those checks.

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d. I do not recall Mr. Karl buying furniture for or from the Sen. Hart campaign. However, sometime in 1984 before LTC bought the assets of KHV, I recall that Mr. Karl told me he was buying a FAX machine for the Hart people. Sometime later in 1984, we received 2 FAX machines shipped to Mr. Karl by Americans for Hart. I understand those machines to be the ones Mr. Karl bought for the Hart campaign. I do not recall how that purchase was made.

e. At some point I prepared for Mr. Karl a compilation of various expenditures for the 1984 Hart campaign. I believe it included the wire-transfers and the personal checks. I believe the total was approximately $100,000 and that Mr. Karl later received from the Hart campaign approximately 10% as repayment for those expenditures. I believe that repayment was received by Mr. Karl personally.

f. To my knowledge, other than some expenses that may have been hidden as KLHV business expenses (such as the Walto payroll, some air charter expenses, and other expenses reimbursed to Mr. Karl by KLHV), no money was spent from KLHV funds for any federal campaigns. Some KHV funds were spent for such campaigns before LTC became involved in October, 1984. After that, the funds for Mr. Karl's political activities came from Mr. Karl's personal accounts.

9. Hart Video

a. At some point in 1986 Mr. Karl and Doug Rosen discussed the idea of making what was referred to as a "Hart

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Video." I understood it to be based on Sen. Hart's book, "A New Democracy," and understood it to be a profit making venture either by Mr. Karl and his associates, including Mr. Rosen, or by KLHV.

b. The Hart Video was worked on by Alison Weir of Complete Productions and by Gino Tenescu and Bill Romeo of L.A. Filmworks.

c. Members of Sen. Hart's campaign staff, McKay Daines and Beth Smith, attended meetings at KLHV about the Hart Video.

d. I know that L.A. Filmworks called and told me they needed more money. Mr. Rosen told me he had put up $30,000 already. I was told by Mr. Karl a few weeks before the termination of Mr. Karl and me from KLHV that the Hart Video was dead.

10. Hidden Campaign Expenses

a. Mr. Karl traveled extensively and had large amounts of expenses for which he was reimbursed by KLHV. Those expenses included chartered aircraft from Martin Aviation, limousine service, and similar expenditures.

b. On numerous occasions I received telephone calls from Richard Wagner and others from the Sen. Hart campaign asking if Mr. Karl could provide "his" aircraft for Sen. Hart, suggesting that they were under the impression that Mr. Karl owned an airplane. Mr. Karl always told me to say yes, and then to arrange a charter. Often the plans would be made and then cancelled by the Sen. Hart staff.

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c. There were some flights that were chartered for Sen. Hart's campaign, including helicopter flights from Los Angeles to Orange County in December, 1985.

d. When Mr. Karl or KLHV received bills for the air charters or other expenses, some would be paid by Mr. Karl and others would be sent to accounting for payment by KLHV or included with Mr. Karl's expense reimbursements from KLHV.

e. On several occasions, people at LTC would review Mr. Karl's expense reimbursements and question certain expenditures, including many of the air charters and credit card charges. Mr. Karl would instruct me to prepare justifications for the expenses. Mr. Karl would dictate business-related reasons for the expenses, even when those reasons were untrue.

f. The invoices sent to KLHV from Martin Aviation included passenger names. At some point Mr. Karl told me to tell Martin Aviation not to list the names. Either Mike Severy or I did so and later Martin Aviation invoices did not include passenger names.

g. I am not aware of any payments of KLHV funds for political expenses for which the true nature of the expense was revealed to KLHV accounting personnel or LTC personnel. On the contrary, any personal or political expenses incurred by Mr. Karl

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which were paid or reimbursed by KLHV were hidden or disguised as business expenses.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 24, 1988, at Los Angeles, California.

Rama Middel

RAMA MIDDEL

Subscribed and sworn to before me on this 24th day of March, 1988.

Donna C. Baruczа

Notary Public in and for the County of Los Angeles, State of California.

OFFICIAL SEAL
DONNA C. BARUCZA
NOTARY PUBLIC - CALIFORNIA
LOS ANGELES COUNTY
My Comm. Expires June 7, 1988

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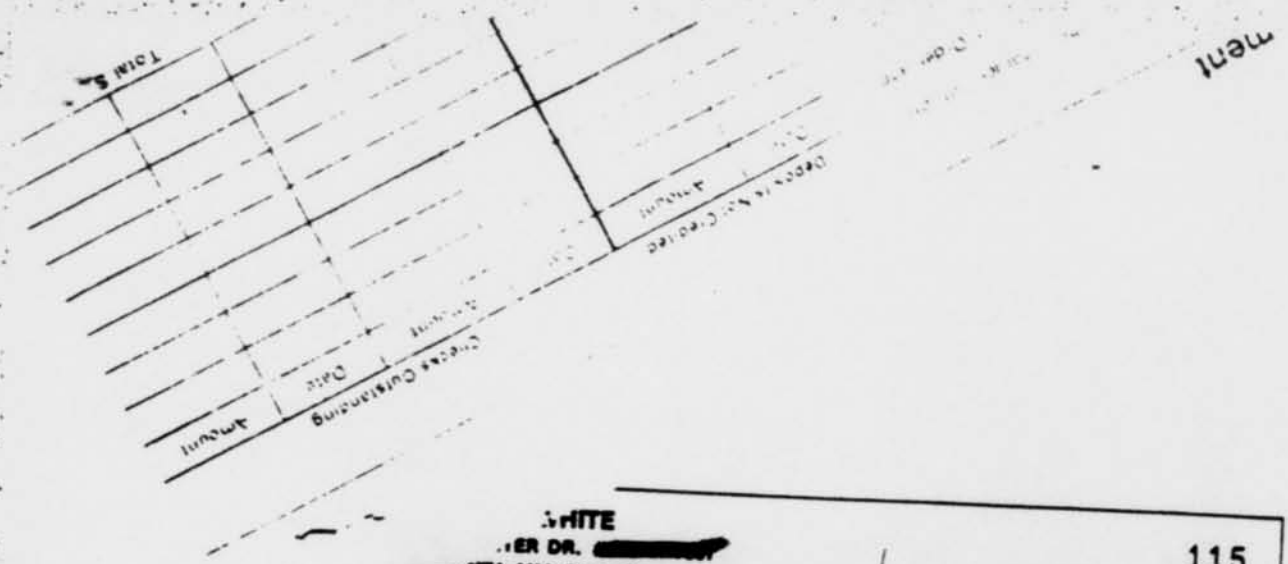

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ER DR. [redacted]
[redacted]

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7/12 1984

Americano With Hart $200.00

Two Hundred and 00/100 Dollars

First Interstate Bank
First Interstate Bank of California
Mariners Office 187
2750 West Coast Highway
Newport Beach, CA 92663

For SK

Lana L. L. [redacted]

[redacted]

EXHIBIT 3
MUR 2583
Witness: MIDDEL
April 27, 1988
Los Angeles, CA

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(12)

RAMA L WHITE
(213) 866-3701

RAMA L. WHITE
[redacted]
916 PARK CENTER DR., NO. 30
SANTA ANA, CA 92705

794

12/18 1984

1021/1220

Pay to the Order of Americans With Hart $ 50.00

Fifty and 00/100 Dollars

First Interstate Bank

First Interstate Bank
of California
Bellflower Office 163
17037 S Bellflower Boulevard
Bellflower, CA 90706

For [redacted]

Rama White

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RAMA MIDDEL
RICHARD P. MIDDEL
816 PARK CENTER, NO. 30
SANTA ANA, CA 92705

WESTERN EMPIRE

1912

10-30-86

cc

cc DMcD

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816 RICHARD P MI
SANTA A

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11/28/86

STATEMENT
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Jo e Bryant, Treasurer

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Dollars

WESTERN EMPIRE

For

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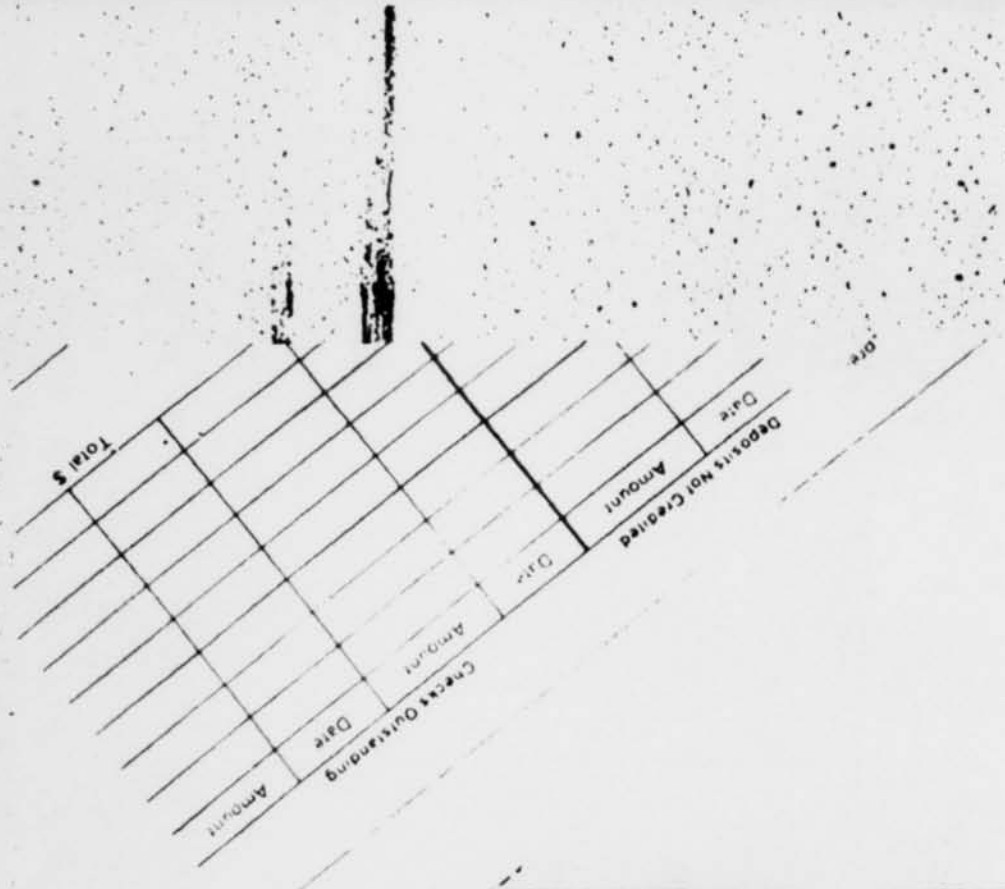

RAMA L. WHITE
PARK CENTER DR., NO. [redacted]
SANTA ANA, CA 92[redacted]

738

11/6 1984

18-21/1220

Pay to the Order of Bradford for Congress $250.00

Two Hundred, fifty and 00/100 Dollars

Fidelity Interstate Bank

First Interstate Bank of California
Bellflower Office 183
17037 S Bellflower Boulevard
Bellflower, CA 90706

For [redacted]

Rama White

⑆930435⑆3650

(19)

Total $

Deposits Not Credited
Amount
Date

Checks Or
Amount
Date

250.00

US - FC - 04

RAMA L. WHITE
816 PARK CENTER DR., NO. [redacted]
SANTA ANA, CA 92705

0450

1-26 1984

18-21/183
1220

Pay to the Order of Friends of Gary Hart $250.00

Two Hundred, Fifty and 00/100 Dollars

First Interstate Bank

First Interstate Bank of California
Bellflower Office
17037 S. Bellflower Boulevard
Bellflower, CA 90706

Rama L White

For [redacted]

9 3 0 4 3 5 3 6 5 1

Telautograph

Since 1888

Telautograph Corporation / 8700 Bellance Avenue, Los Angeles, California 90045 • 213/641-3690

PAID
7951
1.21.85

STATEMENT OF ACCOUNT

529

DATE	CUSTOMER NUMBER
10/31/84	1371-48

AMERICAN WITH HART CAMPAIGN
KARL VIDEO
899 WEST 16TH ST.
NEWPORT BEACH, CA 92663

✓ 3084

1-1410-0000

DATE	REFERENCE	TRANSACTION	CHARGES	CREDIT	AMOUNT DUE
					7,856.52
5/04/84	IN	279629	7,856.52		124.02
5/09/84	IN	553028	124.02		

ENTERED
B 207

FRIENDLY REMINDER

698.54

CURRENT	30 - 60	60 - 90	90 - 120	OVER 120	BALANCE DUE
				7980.54	~~7980.54~~

TO ASSURE PROPER CREDIT, PLEASE REFER TO TRANSACTION NUMBER WHEN REMITTING. THANK YOU.

930435036552

Exhibit 4

Exhibit #4
MUR 2583
W: MIDDEL
320005
4/27/88

HA

9304335 36553

ICATM
POSJ xPay

WHAT ACT

320006

Telautograph

Since 1888

Received
12-20-84

December 18, 1984

Karl Video
Attention: Rama
899 West 16th Street
Newport Beach, CA 92663

Still
need
please !!!

Dear Rama:

Per our phone conversation on December 17, 1984, enclosed are copies of Invoices No. 279629 and 553028. We will maintain our offer of settlement thereby reducing Invoice No. 279629 by $1,000. The total amount we are asking for is $6,980.54 as detailed in our letter to Mr. Rosen.

Your cooperation in forwarding your payment without delay will be appreciated.

Sincerely,

TELAUTOGRAPH CORPORATION

Gerhard Awiszus

Gerhard Awiszus
Accounts Receivable Manager

GA:aa

In reply refer to:
Customer No. 1371-48

9304335 03654

320007

August 22, 1984

Americans with Hart Campaign
899 West 16th Street
Newport Beach, California 92663
Attention: Mr. Rosen

Dear Mr. Rosen:

This is in reference to your phone conversation on August 13, 1984 with our Mrs. Wiberg requesting that we release you from purchase agreement #26502 or mitigate our charges.

You realize, of course, that we cannot unilaterally cancel a purchase agreement in fairness to our other customers. We will, however, reduce our invoice No. 279629 by $1,000.00 to $6,856.52. Also outstanding is an invoice for $124.02 for supplies which for no apparent reason has never been paid.

Summarizing the above, the open items on your account are summarized as follows:

5/4/84	Invoice #279629	$7,856.52
	settlement allowance	(1,000.00)
5/9/84	Invoice #553028	124.02
		$6,980.54

This being a matter of settlement, payment or a favorable reply must reach us within the next ten days.

Thank you for your cooperation.

Sincerely,

TELAUTOGRAPH CORPORATION

Gerhard Awiszus
Accounts Receivable Manager

GA:as

In reply refer to:
Customer No. 1371-48

213 - 822 - 9073

9/20

320008

2304335536555

930435 3656

INVOICE NUMBER
279629

Telautograph

©TELAUTOGRAPH CORPORATION / 8700 BELLANCA AVE., LOS ANGELES, CALIF 90045
(213) 641-3690
D-U-N-S 00-828-7302

BILL TO
Americans with Hart camgaign/Karl Videa
899 West 16th St.
Newport Beach, CA 92663

SHIP TO
SAME
507 8th St., SE
Washington, DC 20003

CUSTOMER P.O. NO	CUSTOMER NO	CODE	SALES ORDER NO	SALES	SERVICE	STATE	INVOICE DATE
Sales Agreement	1371-48	E	26502	664	650	08	5-4-84 gr

ORDER DATE	DATE SHIPPED	SHIPPED VIA	TERMS
			NET 30 DAYS

QUANTITY	DESCRIPTION	DIST. CODE	UNIT	AMOUNT
	PURCHASE OF TELAUTOGRAPH EQUIPMENT PER ORDER 26502:			
2	G39 Omnifax $ 3,500.00 each G39-2050, G39-2051	133700		$ 7,000.00
1	G39 Omnifax Paper 45-5018	163700		117.00
	Installation	191100		125.00
	6% State Tax	199900		434.52
	Freight and Handling	192200		180.00
				$ 7,856.52

320009

INVOICE NUMBER

553028

BILL TO:
AMERICAN WITH HART CAMPAIGN
KARL VIDEO [illegible]
899 WEST 16TH ST. [illegible]
NEWPORT BEACH, CA 92663

CUSTOMER NO.	SALES ORDER NO.
1371-48	135439

CUSTOMER REFERENCE
SIGNED AGREEMENT

SHIP TO:
AMERICAN WITH HART CAMPAIGN
507 8TH ST S.E.
WASHINGTON, DC 20003

LOCATION	SALES AREA	SERVICE	ORDER DATE	INVOICE DATE	DATE SHIPPED	TERMS:
8-001-0010	664	650	4/13/84	5/09/84	4/23/84	NET 30 DAYS

SHIPPED VIA
WITH EQUIPMENT/IMPERIAL

QUAN	PART NO	DESCRIPTION	DIST	UNIT	AMOUNT
1	45-5018	PAPER,RECORDING-OMNIFAX/G	163700	117.000	117.00
		DISTRICT OF COLUMBIA STATE TAX		6.000%	7.02
		VIRGINIA STATE TAX			[illegible]

WE HEREBY CERTIFY THAT THESE GOODS WERE PRODUCED IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS OF SECTIONS 6 AND 12 OF THE FAIR LABOR STANDARDS ACT, AS AMENDED, AND OF REGULATIONS AND ORDERS OF THE UNITED STATES DEPARTMENT OF LABOR ISSUED UNDER SECTION 14 THEREOF.

INVOICE AMOUNT ▶ 124.02

VALIDATED

320010

CLIENT CODE KVC 9304 JOURNAL ENTRY 8AMEX

PERIOD ENDING 8/31/84

CIRCLE JOURNAL TYPE: GJ CR CD PR SJ PJ

PAGE 1 OF PAGES

BOOKKEEPER

SOURCE	DESCRIPTION	DR ACCOUNT	DR AMOUNT	CR ACCOUNT	CR AMOUNT
	· Hart ~~Lease~~ Car rental	6903	5 676 31	2190	5 676 31
		5303	242 59		
		6903	4 037 12		
		6913	145 19		
		6751	1 811 00		
		5752 2003	1 117 00		
		6753	13 505 66		
		5302 6024	759 00	2190	2 448 36

Exhibits

Exhibit #5
MURPHY 2583
W: MIDDEL
+ 12/7/88
3:0025

HD

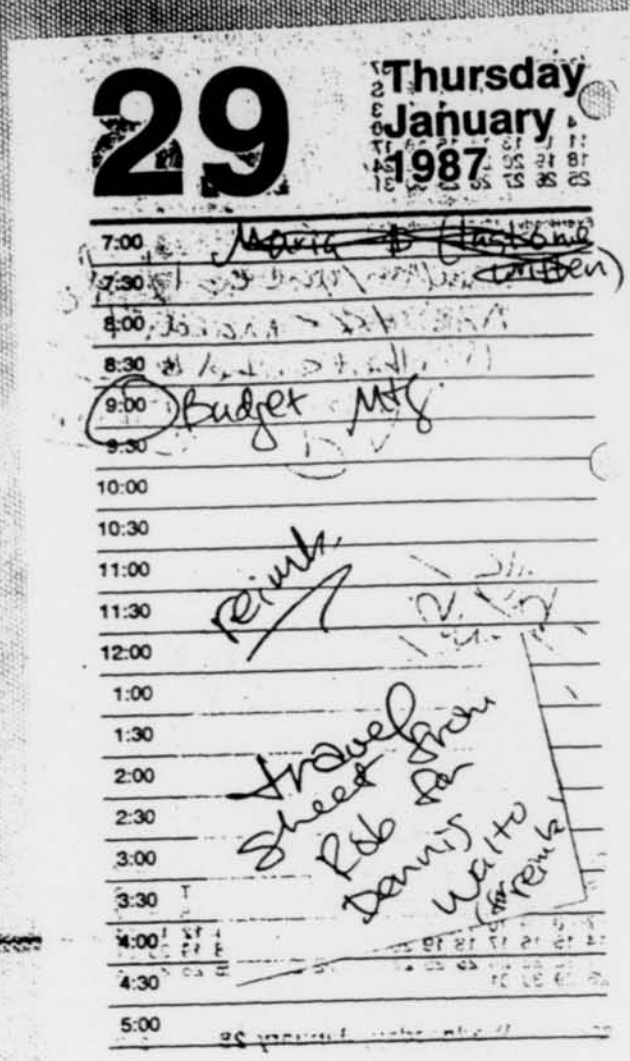

Exhibit 7

610094

Ex. # 7
MUR 2583
W. MIDDEL
4/27/88
HA

610027

9304435360

To: Rama
From: Mr. Dennis Walton
Of:
Area Code: 202 Number: 224-5852
Extension:
Time: 10:38 AM/PM
Date: 4/18

Message: Here are the #'s you can reach me at
301-235-2393 - Friends
301-654-5478 - Friends
202-224-5852 - Gary Hart's office
Good - Thanks - Thurs. pm

Phoned ☒ Call Back ☒ Returned Call ☐ Wants to See You ☐ Will Call Again ☐ Was In ☐ Urgent ☐

Signed

4:00 4:30 5:00

Exhibit 8
MUR 2583
W: MIDDEL 4/27/88 (HA)

Stuart Karl
President

Karl - Lorimar Home Video

17942 Cowan Avenue
Irvine, California 92714
Telephone (714) 474-0355

March 25, 1986

Mr. Craig Baumgarten
LORIMAR TELEPICTURES
3970 Overland Avenue
Culver City, California

Dear Craig:

I just wanted to express my thanks for the use of the film, The Boy Who Could Fly at the Senator Hart event. The evening was made special with the premiere of this delightful film and viewing it certainly added to the success of the evening.

Thanks again,

Stuart Karl

SK:ks

9304335 36611

Exhibit 9
MUR 2583
W. MIDDEL 4/27/88

360014

HA

12/23/86
Executive Staff

1. Business Plan
   - February meeting
   - Strategy session
   - Stan Brenstein

2. January 5 Mtg

3. Political Campaigns
   - C. Hart

4. Henson in January

5. Debbie talks in Spanish

6. Internal audit report / January 5th release
   - receiver / P.O.
   - P.O person
   - direct shipments (have to employee plant)

Attendance Income

Exhibit 10
MUR 2583
W. MIDDEL
4/27/88 Los Angeles

350036
HA

KARL·LORIMAR
HOME VIDEO

MEMO

To: John Lutgens

From: Rama Middel

Re: "An Evening With Barbra Streisand and Robin Williams"

Dept: Office of the President

Date: August 19, 1986

CC: file

On Saturday, September 6, 1986 there will be a dinner and entertainment event at the home of Barbra Streisand in support of several democratic candidates for the United States Senate. (see attached invitation copy)

In lieu of the fact that Karl/Lorimar will be able to obtain the video rights to the "Barbara Streisand/Robin Williams Concert" and it is understood that video rights on future projects will be given to Karl/Lorimar we feel that the company should purchase a table for the September 6th event. Also, Jane Fonda and Steve Rivers introduced Stuart Karl to Barbra Streisand and Jane asked Stuart if he would buy a table for this event.

As stated on the invitation "contributions from corpomations are prohibited by federal law. Thus, Stuart will send his own personal check and Karl/Lorimar will reimburse him for a table at the Streisand event.

RM

9304355363

Exhibit 11

Exhibit #11
MUR 2583
W: MIDDEL
910012
4/27/88
HA

A EVENING WITH

Barbra Streisand

and

ROBIN WILLIAMS

SATURDAY, SEPTEMBER 6, 1986

Please reserve ____ tickets at $5,000 per couple

Please reserve 1 tables at $25,000.

Enclosed is my check for $25,000. made payable to VOICES FOR CHANGE.

Federal law requires the following information

Name Stuart Karl

Home Address 17942 Cowan

City/State/Zip Irvine, Ca 92714

Home Phone (____) _____

Occupation President - Karl Lorimar Home Video

Business Address 17942 Cowan

City/State/Zip Irvine, CA 92714

Business Phone (714) 474-0355

Contributions from Corporate/union/general treasury funds, or from foreign nationals are prohibited by federal law.

Tickets and parking instructions will be sent upon receipt of reservations. Information: (213) 855 0814.

9300433536664

910013

9 3 0 4 3 5 3 3 6 6 5

In support of six outstanding
candidates for the United States Senate:

ALAN CRANSTON, CALIFORNIA
TOM DASCHLE, SOUTH DAKOTA
BOB EDGAR, PENNSYLVANIA
PATRICK LEAHY, VERMONT
TIM WIRTH, COLORADO
THE DEMOCRATIC NOMINEE, MARYLAND

*"Ideas and attitudes turn into action.
Action becomes history and the legacy of
a generation is inscribed."*

—Hollywood Women's Political Committee

AN EVENING WITH

Barbra Streisand

and

ROBIN WILLIAMS

SATURDAY, SEPTEMBER 6, 1986

AT MS. STREISAND'S RANCH
MALIBU, CALIFORNIA

5:00 p.m. cocktails
Dinner shortly thereafter
Followed by entertainment

RSVP with enclosed card by August 29, 1986
For information: (213) 855-0814

910014

This solicitation has been paid for by VOICES FOR CHANGE and authorized by the participants. Joint fundraising proceeds will be distributed among the participants as follows: Hollywood Women's Political Committee (23.16%); Democratic Senatorial Campaign Committee (40%); The Committee for Tim Wirth, Inc. (7.96%); A Lot of People Supporting Tom Daschle (7.96%); Leahy for U.S. Senate (7.96%); to the Campaign Committee of the winner of the Maryland Democratic primary (Michael Barnes, Barbara Mikulski) (7.96%); Bob Edgar for Senate (5%).

Notwithstanding the allocation formula above, contributors may designate their contributions for a particular participant or participants, and contributions may be allocated to comply with federal election law requirements.

Contributions from corporate/union/general treasury funds or from foreign nationals are prohibited by federal law.

VOICES FOR CHANGE
2029 Century Park East, Suite 600, Los Angeles, CA 90067
Treasurer: Bonnie Reiss

930435036666

910015

KARL LORIMAR HOMEVIDEO 17942 COWAN IRVINE CA 92714

RLE NUMBER	INV DATE	DESCRIPTION	GROSS AMOUNT	DISCOUNT	NET AMOUNT
86	8/18/86	VENDOR STUART KARL VOICED FOR CHANGE	25,000.00	CHECK DATE	25,000.00

HECK NO		TOTALS		
	15667		25,000.00	25,000.00

KARL·LORIMAR HOMEVIDEO

17942 COWAN • IRVINE CA 92714
714-474-0355

15667

16 1606 1220

DATE	CHECK NO.
8/20/86	15667

AMOUNT

STUART KARL

******25,000.00

NOT NEGOTIABLE

⑈015667⑈ ⑆122016068⑆ 00⑈83 4469⑈

CITY NATIONAL BANK - HEAD OFFICE 001 - BEVERLY HILLS CALIFORNIA

930435 TH ER. 36667

910010

CHECK REQUISITION

ENTERED 265

TO: ACCOUNTING

FROM Rama Mitchell

DATE: 8/15/86

PS7018

Please prepare a company check for $25,000.00 as follows:

1. Payee: Stuart Karl (- for "Fires For Change")
2. Address: _____
3. Purpose: see attached memo - Barbra Streisand / Robin Williams event. 9/6/86.
4. Date needed: ASAP

Signed Rama Mitchell

515300 0

Approved _____

930435 3 6668

910011

PHONE MEMO

Rama

4-21 12:30

FROM Mr. Richard Wagner will call
Gary Hart off. re: your tomorrow

re: flight cost...
you have already discussed!

SIGNED

WILL CALL AGAIN | CALL BACK | RETURNED CALL | WANTS TO SEE YOU | WILL CALL AGAIN | WAS IN | URGENT

KARL·LORIMAR HOME VIDEO™

Richard Wagner

From The Desk Of
Rama White

Hart

4/85 retreat - Monarch Beach 1191.-

4/85 L.A. - O.C. helicopter

4/85 O.C. - L.A. 114.-

12/85 Falcon S.F. - Fresno - round trip 5751.-

10/18 Falcon - S.F. - LAX 4481.51

12/5-8 Rec. Rm Mission Hills. 4315.-
Helicopter LA = OC conf. LA - LA. Y 3311.-

3/14 86 Hart, Emerson (3 people) helicopter - 444CR $645.

Hart 12/8 Ont. - LAX $2.55.-

Hart + 11 12/15 Van Nuys - LAX - O.C. 1150.-

380018

17942 Cowan, Irvine, CA (714) 474-0355

Exhibit 12
W. MIDDLE 4/27/88 HA

9304335 3669

G. STUART KARL, JR.

June 6, 1986

TO: Americans With Hart

INVOICE: 001

RE: 6/22/85 Air Transportation

COST: $360.

ITINERARY: San Francisco-Fresno-San Francisco

9304355336670

G. STUART KARL, JR.

June 6, 1986

TO: Americans With Hart

INVOICE: 002

RE: 10/18/85 Air Transportation

COST: $150.

ITINERARY: San Francisco-LosAngeles

9304335036711

380017

MartinAviation
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

Total $17,732.
Gary Hart SFO-LAX
5K authorized $10,000. - on Am. Exp.
AM. EX
12-5-85
12/6/85 - Balance: $1,732.

K1204
KARL'S HOME VIDEO

17942 COWAN
- IRVINE, CA.
92714

Invoice No. 00650
Invoice Date 10/25/85
Flight Log Number 5838
Pilot In Command ..... 01-DICK HOFFMAN
Second in Command..... 01-PHIL AMSDEN

Itinerary : SNA SFO LAX SNA

Flight Dates: 10/18/85 to 10/18/85
Aircraft : 1U

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	2.3	1,700.00	3,910.00	
Wait Hours	1.9	45.00	85.50	
Max Wait				
Rons				
		Total Flight Charge ..		3,995.50
CATERING	1	157.00	157.00	
LANDING FEE	1	14.29	14.29	
		Total Misc. Charges ..		171.29
		Sub-Total		4,166.79
		Transportation Tax ...		320.78
		Flight Total		4,487.57

Comments
PAXS: M/M STUART KARL,
SENATOR GARY HART, RICHARD
WAGNER, BILL SHORE

RECEIVED
NOV 4 1985
Ans'd.....

Exhibit 13
MUR 2583
W. MIDDEL
4/27/88
(HA)

380001

930435036 72

TRANSCRIPT OF PROCEEDINGS

GCCA91

BEFORE THE FEDERAL ELECTION COMMISSION

* * *

IN THE MATTER UNDER REVIEW 2583

ORIGINAL

DEPOSITION OF GARY HART

RECEIVED
FEDERAL ELECTION COMMISSION
88 AUG 11 PM 5:05

9304350036773

Denver, Colorado

Friday, July 15, 1988

ACE-FEDERAL REPORTERS, INC.
Stenotype Reporters
~~444~~ North Capitol Street
Washington, D.C. 20001
(202) 347-3700
Nationwide Coverage
800-336-6646

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter Under Review 2583

Deposition of Gary Hart

U. S. Attorney's Office
Federal Building
1961 Stout Street
Denver, Colorado 80294

July 15, 1988
9:30 a.m.

The deposition of GARY HART was taken before VIOLA J. LUNDBERG, Registered Professional Reporter, Certified Shorthand Reporter, and Notary Public, State of Colorado.

APPEARANCES:

JONATHAN A. BERNSTEIN, Senior Attorney, and CELIA JACOBY, Attorney at Law, Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, appearing on behalf of the Federal Election Commission.

LEE D. FOREMAN, Attorney at Law, HADDON, MORGAN & FOREMAN, P.C., 1034 Logan Street, Denver, Colorado 80203, and

BERNARD E. SCHNEIDER, Attorney at Law, BUCHALTER, NEMER, FIELDS & YOUNGER, P.C., 660 Newport Center Drive, Suite 1400, Newport Beach, California 92660-6415, appearing on behalf of the witness.

ACE-FEDERAL REPORTERS, INC.
400 North Capitol Street, N.W.
Washington, D.C. 20001
800-336-6646

9304350 3674

I N D E X

WITNESS:	PAGE
Gary Hart	
Examination by Mr. Bernstein	3

E X H I B I T S

	Marked for Identification
Hart No. 1	50
Hart No. 2	52
Hart No. 3	52
Hart No. 4	66
Hart Nos. 5 and 6	69
Hart No. 7	72
Hart No. 8	79
Hart No. 9	84
Hart No. 10	109
Hart No. 11	111
Hart No. 12	114
Hart No. 13	120
Hart No. 14	127
Hart No. 15	128
Hart No. 16	132
Hart No. 17	137
Hart No. 18	139
Hart No. 19	140
Hart No. 20	142
Hart No. 21	158

9304335 3675

P R O C E E D I N G S

MR. BERNSTEIN: We are on the record now in a Federal Election Commission investigation entitled Matter Under Review, or MUR 2583. This is a confidential investigation being conducted pursuant to Title II, United States Code, Section 437(g).

My name is Jonathon Bernstein. I'm here representing the FEC. And my colleague, Celia Jacoby, is also here representing the Commission.

Senator Gary W. Hart is the deponent here today and, Madam Reporter, I would ask you, please, to swear in the witness.

GARY HART,

called as a witness, being first duly sworn, was examined and testified as follows:

EXAMINATION

BY MR. BERNSTEIN:

Q. Could you please state your full name, address and telephone numbers for the record, please?

A. Gary Hart. Business address is 370 Seventeenth Street, Denver, 80202. Residence

9304356776

[redacted]

Q. Do you understand that this morning I will be asking you a series of questions and that you will answer these questions under oath?

A. I do.

Q. And also if at any time you don't understand a question that I ask, please ask for clarification to make sure that you do understand fully.

The last point is that because this is a transcribed proceeding, please respond orally and not by gestures which won't appear on the record.

Can you, Senator Hart, tell me if you are represented by counsel here today?

A. I am.

Q. And could you identify them, please?

A. Mr. Lee Foreman of Denver, Colorado, Mr. Bernie Schneider of --

MR. SCHNEIDER: Newport Beach.

A. -- Newport Beach, California.

Q. (By Mr. Bernstein) Thank you. Senator Hart, did you receive a Federal Election

9304335 3677

Commission notification and subpoena for documents in March of this year in connection with this matter?

A. Yes. The answer is yes.

Q. Can you tell us for the record what efforts you made to comply with that subpoena?

A. Through counsel and law firm staff and volunteers, former campaign workers, absolute effort.

Q. What did you actually do to, I guess --

A. What did I personally do or what did they do?

Q. What did you cause to have done?

A. I asked them to comply with the subpoenas to the maximum degree possible.

Q. And did you search records beyond the immediate location of your law firm?

A. I personally did not.

Q. Did you cause to have records searched?

A. Yes. That's the meaning of the term absolute. We attempted to comply with the subpoena to the maximum degree possible in every way possible.

9304335 3678

Q. And the documents that were provided by Mr. Schneider to the Commission on your behalf, those were the documents that were responsive to the subpoena, the Commission subpoena?

A. To the best of my knowledge.

Q. Have you reviewed those documents that were submitted?

A. Not all of them, no.

Q. Mr. Hart, are you aware that your committees also responded to Commission subpoenas with documents?

A. In a general sense, yes.

Q. Have you reviewed any of those documents?

A. No, not in detail.

Q. Did you review them briefly? Did you skim through them?

A. No. I discussed the matter with counsel, but didn't personally review the documents.

Q. Can you tell me if there are any other documents that exist to your knowledge that would be responsive to the subpoena?

9304350 36779

A. Not to my knowledge.

Q. Can you just relay what we talked about before we went on the record as to the difficulty you had in the misplacement apparently of some boxes of records?

A. Well, my understanding is that some specific detailed schedules of mine in the period that I was still in the United States Senate and not an active candidate for national office have -- are not available to us for whatever reason at the present time.

The best we can determine is that in a move within my law firm that some of those records may have been misplaced temporarily -- hopefully not permanently lost -- but that we continue to make every effort we can to find them.

Q. And do you know is this one box that's been misplaced --

A. I have no idea.

Q. -- or several boxes?

A. I have no idea.

It's -- there is an assumption, I

9304350 3680

think, that there were systematic daily records kept of all my movements both on the road and in Washington at the time, and that was not the case so I suppose part of the problem is to know exactly what it is we're looking for here.

Q. Can you tell us if you used any materials to prepare for this deposition?

A. No, I did not.

Q. Did you have discussions with anyone other than counsel in preparation for this deposition?

A. No, I did not.

Q. Senator Hart, I wonder if what you would do for us now is to just start off to summarize, including the rough dates, what your political activities and political campaigns have been beginning with, say, 1980 -- after 1980? Could you do that for us?

A. I was a candidate for the nomination of my party for president in 1984 and announced my candidacy for nomination to the Democratic party in the spring of 1987 and after retiring from the race

9304350 3681

in '87 reannounced my candidacy in December of 1987 and then withdrew from the race in March of '88.

Q. Were you a candidate for the U. S. Senate --

A. You said after --

Q. -- after 1984?

A. You said after 1980. The answer is no.

Q. Can you tell us by 1984 what familiarity with the Federal Campaign Finance Laws you would have had?

A. Well, it's pretty vague if not an open-ended question. I suppose the same familiarity any United States Senator or candidate for national office would have, no more or no less.

Q. Were you aware of the limitations and prohibitions of the statute?

A. Of course, of course.

Q. Could you please tell us who the principal officers and officials were of your 1984 presidential campaign?

A. Would you define principal?

9304335 3682

Q. Who was the person in charge?

A. Campaign manager was a man named Oliver Henkell of Cleveland, Ohio.

Q. And what was your association with him?

A. He was personal friend, law school classmate, and manager of my presidential campaign.

Q. Had he been involved in your Senate campaigns?

A. No, except for perhaps as a contributor. I'm not sure.

Q. And did his involvement continue into 1988?

A. Well, there was nothing to continue after the campaign ended, I suppose, at the convention in '84 so there was no campaign to continue with.

Q. Did he have an association with you after the campaign ended?

A. Personal, yes, and social.

Q. But no official capacity?

A. No, there was -- no, the answer is no.

9304357 36883

Q. What was his responsibility as campaign manager?

A. To manage the campaign.

Q. And did he have responsibility for fund raising, for example?

A. Generally had responsibility for everything. That's what a campaign manager does.

Q. That's not a helpful question is the answer you're giving to me.

Okay. What involvement did Michael Moore have in your '84 campaign?

A. My recollection is he was the treasurer.

I want to make sure that I got the title correct. I believe that's correct. His principal responsibility in that capacity was to comply with or seek to comply with Federal laws in this section, reporting particularly.

Q. And how did your association with him begin?

A. What do you mean? How did it begin? When did I meet him?

9304335 3684

Q. How did he come to become your treasurer?

A. Oh, I think he was involved at least in the 1980 Senate race, and I can't remember if he was a supporter in 1974 but any in case I know that we knew each other in 1980 and he was a supporter -- I don't know whether he had a title or not in the 1980 Senate race, but I would say we became acquainted sometime in the 1970s.

Q. And he had involvement as well in your 1988 presidential campaign?

A. My recollection is that he was -- I don't know whether he had a title or not. He may also have been treasurer of the first campaign in the spring of 1987. I believe he was fulfilling the capacity if not also having the title of treasurer in that campaign.

Q. How about James Dwinell?

A. James Dwinell was involved in the Washington headquarters in 1983 and '84. Again I haven't gone back and reviewed titles so I don't know exactly what title he had in that campaign, but it

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was principally in the area of, I suppose -- the title he should have had was something like comptroller.

His principal responsibilities under Mr. Henkell were to receive and disburse funds, but I don't know off the top of my head what title he had at that time.

Q. Did he have authority to transact business on behalf of the campaign?

A. As far as I know, yes.

Q. And he reported to Mr. Henkell?

A. As far as I know, yes.

Q. And what association did he have with you after your 1984 campaign ended?

A. I suppose one of friendship.

Q. No official capacity?

A. There was nothing to be official about to my knowledge. Closed down -- the winding down operations, I suppose he was involved in, but I don't even recollect what period of time that required.

Q. He wasn't on your Senate staff?

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A. No.

Q. How about Richard Wagner?

A. A worker, staff member in Washington, and I think may have done some advance work and perhaps field organizing, although I'm not sure.

Q. And that was in the '84 campaign?

A. '84 campaign.

Q. And who did he report to?

A. I don't know.

Q. But you think he did advance work?

A. I don't know. I'm just trying to cover all bases here. I say he may have. He may have done advance work, may have done some organizing in the field.

My recollection is he was primarily in Washington although I'm not -- I couldn't vouch for that.

Q. Would he have been in a capacity to write various memorandums to you?

A. Well, only in the same regard that everybody in America was. Anybody could have written me memorandums.

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Q. Did everybody on your campaign write you memoranda?

A. They were certainly capable of it.

Q. In the ordinary course of business did everybody on the campaign write you memoranda?

A. I don't recall, no. I don't think so, but there was no prohibition against it so all I'm trying to suggest is Mr. Wagner may or may not have, I don't know.

Q. If he was doing advance work, he might have written you memorandums about events you were going to participate in?

A. He might also have written memorandums about foreign policy or defense policy. People did that, but I don't recall whether he did or not.

Q. And did he continue on your '84 campaign after the campaign ended on financial matters?

A. Not to my knowledge, but I couldn't vouch for that a hundred percent. There were a few campaign people moved into the Senate staff. My

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guess would be fewer than six and there was a period of time, I guess what you call a wind-down time, where there was a small compliance staff in a separate office under the Americans with Hart, Inc., and I think Mr. Dwinell was involved in that, and Mr. Wagner may have also have been involved with that. I can't recall who all that was.

Q. You said there were six --

A. My guess is there were fewer than six.

Q. Could Mr. Wagner have been one of them?

A. As I said, he could.

Q. And Mr. Dwinell?

A. Could have been, yes.

Q. Do you have any other --

A. I'd have to go back and -- I can't recall. I went over there a couple times and my memory was there seemed to be about half a dozen people and some were volunteers and some were paid staff.

Q. How about Scott Van Hove?

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A. I think he was also one of those, I believe.

Q. What was his function in the '84 campaign?

A. I don't know. I think in the field of compliance primarily, but I don't know that for sure.

I should say at this point to perhaps relieve you of some of this burden, my style as a candidate was to pick a manager and let the manager manage.

Having managed a presidential campaign before, I felt very strongly about that, whether I was running for the Senate or the presidency, and I really didn't know or seek to know detailed operations or responsibilities.

Q. I understand that, and the reality of it is if the questions tend to presume knowledge, then you just need to advise me of that.

A. I'll try to do that categorically.

Q. Eventually I'll get the message. Did Mr. Van Hove work in your '88 campaign as you recall?

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A. I don't recall. He could have.

Q. How about McKay Daines?

A. Daines does not ring a bell, but again at what point? In '84 or '88 --

Q. Well, starting with '84.

A. These got to be rather large operations and it doesn't ring a bell.

Q. How about in the interim period after the '84 campaign ended?

A. The same answer.

Q. No recollection?

A. Don't have a recollection.

Q. Patti Sampers?

A. Yes, Patti Sampers was involved, I think, working with Mr. Moore in, I think, the '80 Senate campaign and the '84 presidential campaign and at least run-up to '88, but I can't give you specific times or whatever.

Q. How about Steve Rivers?

A. I don't believe Steve Rivers -- if we're thinking of the same person -- was ever a staff member in any of my campaigns. My recollection is

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Steve Rivers worked for other candidates or other public people or supporters of mine.

Q. Might he have been a volunteer --

A. Yes, he might have, yes, yes, but I don't think a staff member. I could be wrong, but I don't believe so.

Q. And do you know if he was involved in the '84 campaign --

A. I don't think so -- well, involved -- how would you define involved?

Q. Well, this all hangs on what you were aware of. If you were aware of him engaging in activities in your behalf?

A. I think your question is could he have been involved, and I guess the answer is yes, in the same sense that thousands of other people could have been involved.

The question is what does involved mean, and there are tens of thousands of people who were involved in the '84 campaign.

MR. FOREMAN: Excuse me. Mr. Bernstein, do your questions have a particular

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focus on matters financial, or is it just open-ended? Maybe that would be helpful to the deponent.

MR. BERNSTEIN: The answer to that really is both. There are some that the primary interest is financial but others really not so, so --

THE WITNESS: I must say it would be helpful to me to know where we are headed here, because when you say could somebody have been involved, as I have indicated this was a voluntary grass roots -- my campaigns have been grass roots voluntary campaigns which means that lots of people can be involved that neither I nor even the campaign manager would know.

Part of the problem in compliance, if I may so, with your organization is that you are held responsible for the activities of thousands of people who may or may not be responsible to you, and I think you recognize that problem, so I can't answer a question about whether somebody could have been involved. The answer is yes.

Q. (By Mr. Bernstein) And you point out that the question was awkwardly phrased because

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particularly what I'm most interested in is what your recollection was of particular people and I'm not -- and what you cannot answer and would not be useful would be, you know, speculating on what could have been so I'll try to be more --

A. I'm trying to protect myself here because I guess the answer to all these questions would be yes, but I don't know how that's helpful to you. If you use words like would, yeah.

Q. How about Beth Smith?

A. Beth Smith had a press responsibility in the '87 part of the campaign -- well, '87, yes.

Q. Do you recall if she had a responsibility in the '84 campaign?

A. I don't.

Q. Did she at any time work on your Senate staff?

A. I believe she was on the Senate staff in '85 and '86, but I wouldn't swear to that.

Q. And could you describe her responsibility --

A. Press, press responsibility.

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Q. Was she involved in media at all to your recollection?

A. The term press generically includes media or media includes press, yes. The answer is yes.

Q. And Keith Glaser?

A. Keith Glaser was involved in the '84 campaign, I think, in an organizational capacity for the political organization in Iowa particularly and in various other states after that, but I can't tell you which ones and when.

Q. Do you recall him having any responsibility in California in the '84 campaign?

A. Well, by the time we got to the primary everybody had responsibility because the whole campaign moved.

Q. Rick Reiter?

A. The same answer.

Q. Did he have any involvement after the campaign terminated?

A. You are going to have to be more precise with that word involvement. I don't know

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what it means.

Q. Well, were you aware, for example, that he was involved -- that he worked either on salary or some other capacity with AWH after the campaign ended?

A. No.

Q. Was he on your Senate staff after the campaign ended?

A. I don't believe so, but he might have been.

We're talking about Rick Reiter?

Q. Yes.

A. I don't think he was on the Senate staff. I don't believe so. Keep in mind the Senate staff also included an office here in Denver with at least a dozen or more people that do case work and a lot of other things and it was a rather large staff even by Colorado standards and people came and went.

Q. Do you know Bill Shore?

A. Very well.

Q. Or William Shore?

A. Yes. He was on my Senate staff about

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ten to twelve years, I think certainly the entire time I was in the United States Senate.

Q. And did he function in some capacity in your presidential campaign?

A. Yes.

Q. And what was that capacity in 1984?

A. Primarily as personal aide to me as the candidate. He traveled with me a great deal although not uniformly, but usually when I was on the road traveling, he would be with me, certainly after the primaries began in 1984, and his job was to be liaison with the headquarters and relay information back and forth and also to help with the logistics of my own movement.

Q. That was in 1984?

A. Yes.

Q. And subsequently?

A. He was on the Senate staff in '85 and '86 and would have been involved in the presidential campaign beyond that had it gone forward.

Q. And he was someone -- you said he was your personal aide. You were very closely associated

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with you?

A. During the '84 campaign. He was one of a number of Senate staff people for ten or twelve years and not particularly closer than anyone else during that period of time.

Q. John Emerson?

A. John Emerson was an organizer for the '84 campaign in California for a period of approximately six to twelve months. I don't know of my own knowledge how much of that time he was on salary, if ever, but much of it he was operating in a volunteer capacity.

Q. Was he a fund raiser as well as organizer?

A. Not principally. I was the fund raiser. His principal responsibilities were political organization in California.

Q. Did you have contacts with him after the '84 campaign ended?

A. Yes.

Q. What was the nature of those contacts?

A. Social and personal, and he was,

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I believe, either preparing to come to Colorado or actually had in a full-time capacity in early '87.

Q. And did he then work on your '88 campaign?

A. Well, that's what -- '87 being the '88 campaign.

Q. And John Garamendi?

A. He's a state senator in California or was the last I ever heard of him. He was a supporter, I believe, in '84.

Q. Do you know what activities he engaged in on your behalf?

A. No, no.

Q. He didn't have any formal capacity --

A. No.

Q. -- with the committee?

A. Not to my knowledge.

Q. Mike Novelli?

A. Mike Novelli had some responsibilities in -- I believe in '84 both in fund raising and perhaps compliance, I'm not sure, and was preparing at least to have -- and had some

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interim responsibilities in '85-86 although I'm not clear -- I think he was on the payroll of Americans with Hart, Inc., for a period of time, and I don't know how long -- when it started or how long it lasted and he was preparing to play generally the same role in '88.

Q. And Douglas Rosen?

A. Douglas Rosen was a supporter of mine in '74 as a student in the first Senate race and I think played some role -- may or may not have been a contributor in '80. He came to Washington for a period of time in late '83, as I recall, or early '84 to help in fund raising.

I don't know what title if any he had at the time. My recollection is he reported either to Mr. Henkell or Mr. Dwinell or both, and then just played a general fund raising role, I guess, throughout the campaign.

Q. Did you have contact with him regularly during the '84 campaign?

A. No, no -- well, define regular.

Q. Did you have contact with him when,

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for example, you visited California during the '84 campaign?

A. May have, but not regularly -- what's regularly? What's regularly?

Q. Sufficiently to distinguish him from the mass of other people.

A. Well, he had already done that by virtue of having been a supporter early on. I knew who he was. No, the answer to your question is no, but if regular means every six months, yes.

Q. You are not aware of what title if any he had with the campaign?

A. No. My campaigns have always been rather casual about titles.

Q. And was his involvement primarily fund raising or --

A. That's my understanding, but I think Mr. Henkell would be the best source for that answer.

Q. Was there anyone else in the campaign with primary responsibility, managerial responsibility, for the fund raising operation that we haven't already discussed?

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A. Which campaign?

Q. The '84 campaign.

A. Well, it depends on what period of time. The campaign spanned the announcement in February of '83 through, I guess, whenever formal closedown there was of the committee in '85 or '86 so that's about a two-year period, and I'm sure the answer is yes, but you'd almost have to segregate out.

The bigger it got obviously after the primaries started, the more people were involved, but again not necessarily the titles.

Q. I'm trying to get a sense of who the key people were.

A. Henkell, Dwinell. There was a finance committee, and I suppose what we ought to try to do is get the names of the people on the finance committee because it was a rather -- it went from a dozen or fifteen to several hundred.

Q. Bill Dixon?

A. Bill Dixon was not -- my recollection is was not actually involved in '84 -- I mean not

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centrally involved in '84. I think he was a supporter and a helper, but he came back to the Senate office in, I believe, '85 as administrative assistant in the Senate office and then was going to be or was or was going to be the campaign manager in '88.

Q. I think I omitted to ask if you continued to have contact with Mr. Rosen after the '84 campaign ended.

A. Not on any regular basis.

Q. And did he have some capacity in the '88 campaign when that started?

A. My recollection is no, but Mr. Dixon would be the principal source for that.

Q. And Chris Townsend?

A. What about him?

Q. What activities to your knowledge did he engage in on behalf of the '84 campaign?

A. I don't know.

Q. Is his name familiar with you?

A. Yes, I know who he is, but I can't tell you what he did in '84. If he was involved at

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all, I would assume it was in some organization or fund raising capacity.

Q. How is his name familiar with you?

A. Just --

Q. How is he familiar to you --

A. Just social and political contacts. I don't recall where we met or what would distinguish him from, say, dozens if not hundreds of others.

Q. Mike Stratton?

A. Mike Stratton is a businessman in Denver who I have probably known five or ten years at least. I think he's been helpful to me one way or the other in most of my campaigns including the '80 Senate campaign and beyond and played some political organizational role in both '84 and '88.

Q. Did you have during the '84 campaign an inner circle of advisors?

A. Not a formal one.

Q. An informal one? Are there any other individuals that we haven't covered who played a major role in your '84 campaign?

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A. Define major.

Q. A notable role.

A. Define notable. Look, people come and go. Now, I'm sure there were people whose advice I sought, a lot more people's advice I got, but --

Q. Unsolicited --

A. Well, that's your word. But I don't know whether that makes them notable or major or whatever word you were using.

I'm not trying to be evasive. I just don't -- I think you've covered about all the bases -- that doesn't mean there weren't other people who if you were to go around and say did you play a major role in the campaign would say yes, but you're dealing in abstractions here.

Q. Were there other people you haven't mentioned whose judgment you relied on substantially?

A. What do you mean by substantially?

Q. Does that help?

A. When? People come and go. Particularly when you are doing poorly they tend to go. When you are doing well, they tend to come so

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pick a time. What time period are you most interested in?

Q. I'm interested in both the genesis of the '84 campaign in late '83, early '84 and also carrying forward.

A. The genesis is '82.

Q. I was qualifying that by saying I'm saying in late '83.

A. Late '83-84. It was a very small group then. Before New Hampshire is the group we talked about. After New Hampshire it got very large.

Q. And there was?

A. There was a man named John Macelboy who got involved at some point. Pat Cadell got involved. Many Miles Rubin got involved. But there was no system by which you put a star, an asterisk, after people's name and at the bottom of the page it says major or substantial or whatever.

It's free form. Another friend of mine -- an old friend named -- oh, such a good friend I can't remember his name. I'll think of it in a minute.

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Q. Can you tell me what's the meaning of prospect or prospecting if what you are describing is some sort of travel or activity or meeting or that sort of thing?

A. In what context does that word arise?

Q. In the context of a meeting being described as, quote, prospecting.

A. It's not a word that I routinely use or has any definition in terms of art, political art. I would guess what it means is potential contributors.

Q. That's if -- if that word were used on a schedule describing a meeting, that's what you would assume it would mean?

A. Yes.

Q. Can you tell me what the Hart 1,000 is? Is that -- is that a mailing list?

A. Yeah, a mailing list, I believe.

Q. Composed of --

A. I would suppose principal contributors, supporters.

Q. What I'd like to do for a moment is to

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get into a little bit, when you were on the road campaigning, what your interaction ordinarily was with the advance people who did work for you and how that worked.

A. Is it permissible for me to ask the relevance of a question like that to your proceeding?

Q. Unfortunately, the simple answer to that is the Commission has authorized an investigation. The ordinary Rules of Evidence of relevance and that sort of thing are not strictly applicable and, you know --

A. Well, as a citizen.

Q. Believe me, what I'm not trying to do is to waste your time, but we are trying to get, you know, an understanding of things.

A. Yes.

Q. And that's what the goal is.

A. Understanding of what things?

Q. Of the subjects that we're discussing and the people that we're discussing.

A. Well, my understanding was the subject we were discussing were questions of compliance with

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the FEC laws and I'm not quite sure what that question has to do with it.

Q. Well, as I think --

A. Along with a lot of the others you've asked.

Q. As I think you must have an impression, this is an investigation which is quite broad. It involves a range of activities. It involves a range of people and also of time and, as a consequence, what we need to understand and want to understand is a background of information that will help us make more sense out of all of these activities, and that's the goal of the questions.

MR. SCHNEIDER: Mr. Bernstein, maybe if you address your question a little more specifically rather than saying what was your general relationship with advance people?

A. As a former Senator, I have a little knowledge of the FEC laws, and I'm not sure that they authorize complete understanding of the way politics works in America. I guess that's my confusion.

I've written books on how to run

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a presidential campaign. I can make those available to you, but as a citizen and former Senator and former candidate for national office, I am concerned that the agencies of the Federal Government do what they are supposed to do and no more.

You want to know what an advance man does?

Q. (By Mr. Bernstein) When you traveled, Senator Hart, did you receive a schedule of events that told you when things were going to be and where?

A. Yes, generally yes.

Q. And was it your impression that those schedules were made available to advance people?

A. I suppose.

Q. And is it your impression that the advance people used those schedules to coordinate their activities?

A. I suppose. Therefore what?

Q. Is advance work something that is very demanding in terms of hours? Is it highly --

A. I don't see the relevance of that

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question to anything -- any of the laws relating to FEC, period. Now, if you can explain it to me, I'll be more than happy to answer the question.

Q. I'm sorry. Are you refusing to answer my question?

A. No, I'm trying to find out what its relevance is to this inquiry and I think I have a right to do that.

Do advance people work hard? The answer is yes.

Q. (By Mr. Bernstein) Did they work long hours?

MR. SCHNEIDER: Mr. Bernstein, it seems to me that what you are asking for is a primer on political campaigns. Sometimes advance people work long hours, sometimes they work five minutes. It depends upon what they have been asked to do, and I don't see how -- what's important about whether or not Mr. Hart thinks that advance people work long hours or short hours or no hours.

Q. (By Mr. Bernstein) Can you list for me the advance people whose names you remember from

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the '84 campaign?

A. I suppose I could, but to what purpose? I mean there were dozens if not hundreds, and it would take a rather long time to try to remember all their names. And I would miss more than I would recollect.

I think it would be easier if you gave me a list of names and you asked me whether I remembered them or not. There were a lot of people, and most of them were volunteers, most of them were local.

It was a very low budget campaign that relied very heavily on local people and more often than not particularly in the period of time that you're interested in, I would not know who they were.

They worked very hard. They worked long hours. Quite often for little money or sometimes no money or they paid their own expenses or whatever, but again I go into great detail in a book called Right from the Start which was published in 1973 by Quadrangle Press about how this works if

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that's what you're interested in.

Q. Did your 1984 campaign, Senator Hart, recognize or honor or in some other way show to people who had raised a significant amount of money on your behalf?

A. I'm not -- I don't know what you mean.

Q. Did people who raised large amounts of money -- did they get titles or --

A. Not to my knowledge.

Q. -- capacities or --

A. Not that I was aware of. I hope they got a letter of thanks when it was all over.

Q. Do you know Stuart Karl --

A. Yes.

Q. -- Senator Hart?

Q. When did you first meet him?

A. I don't remember, probably in 1983 although it may have been '82. My guess is sometime in 1983.

Q. Do you remember how you were introduced?

A. I do not. My guess is that he

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probably attended an event that someone held on my behalf in California in '83.

Usually what happens is somebody will -- some person will become committed or dedicated or a supporter and they are asked to bring together their friends and I meet their friends, and sometimes they will become supporters and the circle widens, and my guess is that Mr. Karl probably came to an event that someone else hosted sometime in '83, but I don't rule it out it to have been '82.

Q. Could you describe as best as you can remember the development of your relationship with Stuart Karl?

A. Pretty much the same as dozens if not hundreds of other relationships. He would be invited early on to attend events in the region when I would be giving a speech or making an appearance.

The more interest he evidenced -- and I'm using he here generically because this is sort of a pattern -- in the campaign, either voluntarily or in response to a solicitation, then the more efforts were made for me to be personally in

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contact. Usually again I wasn't a particularly good recruiter on the telephone. I'm notoriously no good actually so most of what recruitment I was involved in was face-to-face.

And I suppose that his recruitment or his engagement in the campaign followed that pattern, but it would not have been significantly different than from, as I say, dozens and probably hundreds of others around the country.

Q. And what role did he play in the '84 campaign to your knowledge?

A. I don't know if he ever had a title. He was presumably asked to help raise funds for the national campaign and the California effort, but I don't -- my recollection is that he never had a title as such and I don't think that the dozens or perhaps hundreds of others like him around the country ever got titles.

To reiterate the point, we were not a campaign that was highly stuctured or corporate in nature.

Q. Can you estimate the frequency of

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contacts that you had with him during the 1984 campaign?

A. Well, I have to date the 1984 campaign from late '82 through -- and late '83 through sometime in '85, I suppose, and if you average out the times that I was -- that we were in each other's presence over that two-year period, my guess is it was every three months but sometimes more, sometimes less.

Q. And presumably --

A. Let me underscore guess.

Q. -- in the spring of 1984 when the campaign was vigorous you came in contact with him more frequently than that?

A. I think that's true, but I think also in larger and larger gatherings. As the campaign gathered steam and momentum and got bigger and bigger, the time for personal contact diminished.

Q. But he had been involved at the time when the campaign was still small before it --

A. Yes, in some level, but let's keep in mind at that time I was spending more of my time in

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New Hampshire and not in California so there were not a lot of occasions where I was going to California to spend time with Mr. Karl or anyone else. We flew out to raise money and turned around and headed for Iowa.

Q. Do you remember attending a fund raiser at Stuart Karl's home in 1983?

A. Yes, I do. I mean if you say it was '83 -- I couldn't give you the month or even the season, but I remember being in his house, and I think it was fairly early, my recollection is, and it may or may not have been a fund raiser.

That is to say I'm not sure the money was gathered at the door. It may have been a prospecting event, but I have now exhausted my recollection on that.

Q. Just to follow that up one -- I asked you about prospecting before. Do I gather that a prospecting is something different than a fund raiser --

A. We went over that ground.

Q. -- people that might be --

A. What I said was I presume the word

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meant to recruit potential contributors.

Q. For future contributions, not a class of fund raisers?

A. Well, it would be hard to solicit them for past contributions.

Q. Can you tell us what activities were involved in what have been described in some of the documents that are produced as Hart retreats?

A. There were a few events in '85 or '86 or both where we attempted to get together people who had been helpful in '84 and their friends with the idea that if another national campaign effort was made that we would like to have their help, but they were much more social -- well social, I would say, where I put it this way -- they were at least as social as they were political.

Q. Do you recall a retreat in early 1984?

A. Not -- well, we weren't using that word at that time and the retreat concept was a leisurely one and I don't remember anything that was leisurely in '84, not to say that a group of people didn't get together for a period of time, but

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I was killing myself at the time in Iowa and New Hampshire so -- if you could be more specific, I would probably be more responsive. Did you have a date or a place or people --

Q. Well, do you recall a retreat or a gathering in February of 1984 that Stuart Karl may have attended?

A. I certainly wouldn't categorize it as a retreat. February of '84 was the Iowa caucus and New Hampshire primary and I wasn't retreating anywhere except Dubuque.

Q. To your knowledge, did Stuart Karl attend the Democratic convention in July of that year?

A. I have no idea. I suppose he did since it was in California and that's where he's from, but you are asking the wrong person if you are trying to find out who all was at that convention because I had other things on my mind.

Q. Do you have a recollection of additional contacts with Stuart Karl after the '84 campaign?

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A. Additional to what? You mean did I ever -- was I ever in his presence after '84? Yes, but I can't tell you when or where.

Q. Did you have social gatherings with Stuart Karl?

A. I may have. I may not have, I don't know. Again it would be helpful to me if you would specify times and places.

Q. Let me just hand to you, Senator Hart, something in the nature of a schedule, and I have one extra copy for the lawyers.

(Documents were handed to the witness and Mr. Foreman and Mr. Schneider by Mr. Bernstein.)

Q. (By Mr. Bernstein) Senator Hart, is this the sort of schedule you were earlier describing that you would receive during any kind of travel and that sort of thing?

A. Generally.

Q. Who would prepare a schedule like this?

A. Well, who would keep it would probably be a woman called Elsie Vance, who was my

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administrative assistant for about twelve years in the Senate.

Prepare in the broad sense of the word, probably several people.

Q. It seems to indicate a meeting with Stuart Karl in the dining room. You had lunch with Stuart Karl?

A. If, in fact, I followed that schedule. Sometimes schedules would be made; events would get canceled, but if the event went forward as the schedule says, then I had lunch with him.

Q. You don't have any personal recollection of that?

A. No.

Q. Do you have a sense of how many additional such meetings you had with Stuart Karl?

A. No, I don't. If I had to guess -- and it would be a pure guess -- it would be -- in what period of time?

Q. After the 1984 campaign, 1985, 1986.

A. 24 months? I may have seen him three times a year, four times maybe, I don't know.

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That's a totally pure guess, but I couldn't give you times or places.

Q. What would have taken place? What took place at your meetings with Stuart Karl?

A. I have no idea. I suppose discussion about the possibility of another national race would be another thing. Retirement of the '84 debt would be another. Events of the day.

Q. Do you remember attending the Kentucky Derby in May of '85 with Stuart --

A. Yes, I remember attending the Kentucky Derby. I don't remember Stuart being there.

Q. Who do you remember being there?

A. Let's see. I think there were about 125,000 people. No, I remember --

Q. In your group.

A. My wife and I were there as the guests more or less, I guess, of the governor of the State of Kentucky so I'm not sure we had a group. Some supporters came, but we were not organized as a Hart group as such.

Q. Were you at the Kentucky Derby --

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A. Yes --

Q. -- with Stuart Karl?

A. No.

Q. Do you recall helicopter and airplane trips with Stuart Karl after the 1984 campaign?

A. I don't specifically. There might have been. I know of one occasion where a conference, an international trade conference I helped organize in Southern California that began on Friday night and went through Saturday and Sunday, as I recall -- I could be wrong on the dates -- where I flew from Washington after the Senate business to Los Angeles and then had to get down to the trade conference in Southern California, a distance of perhaps 40 or 50 miles by helicopter. I cannot tell you whose helicopter that was.

MR. BERNSTEIN: Before we go on I would like to have the reporter mark the first schedule as Exhibit 1 in this deposition.

(Hart Exhibit 1 was marked for identification.)

Q. (By Mr. Bernstein) I would like to

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show you another schedule, Senator Hart, this one dated May 3, 1985, and this concerns the Kentucky Derby.

Does that refresh your recollection at all of the group that --

A. Only in that I see names on the list that I believe never got to that dinner. Some of the names are totally unknown to me. That is to say they don't ring any bells at all.

I do recollect a dinner. I do recollect that some of these people were there, but I'm almost positive that this entire list was not there, and I cannot say with absolute certainty that the Karls were there. They may have been there. They may not have.

MR. FOREMAN: Excuse me, counsel. Was that marked as Exhibit 2 or not at all?

MR. BERNSTEIN: It has not yet been marked.

THE WITNESS: There was a dinner that my wife and I attended and some of the people there were at the dinner.

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MR. BERNSTEIN: Exhibit No. 2.

(Hart Exhibit 2 was marked for identification.)

MR. FOREMAN: Excuse me. Off the record -- which is, in fact, the one you just looked at, or is Exhibit 2 another document?

MR. BERNSTEIN: I'm sorry. The one we just looked at was Exhibit No. 2.

Q. (By Mr. Bernstein) Here is yet another schedule, October 7th, '85, and this again indicates a lunch with Stuart Karl in the Senators' dining room.

Do you have a recollection of this?

A. I don't, and I it may or may not have occurred. As I say, everything that got typed on the schedule didn't happen.

MR. BERNSTEIN: Would you please mark this as Exhibit 3?

(Hart Exhibit 3 was marked for identification.)

Q. (By Mr. Bernstein) Senator Hart, during the 1984 campaign were you aware of any scheme

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to reimburse contributions made to your campaign?

A. I was aware of no scheme to do anything. We didn't scheme.

Q. To your knowledge, did anyone involved in your campaign ever discuss reimbursement of contributions?

A. Not to my knowledge, and I'm not sure why we would have. We were seeking contributions. We had no money to reimburse.

Q. Then I haven't been clear at all. Let me start over again.

Were you aware of any plan that individual contributions would be reimbursed from another source?

A. No. In fact, it would be contrary to all the instructions I have given to anybody involved in any campaign I have ever been involved in if you mean an illegal plan.

Q. I'm sorry. What I don't mean is reimbursement by the committee of contributions. That's not what we are discussing.

Are you familiar with sale/leaseback

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transactions during the '84 campaign?

A. No, no, I'm not.

Q. Are you familiar with the purchase of equipment by Stuart Karl on behalf of the campaign during 1984?

A. No, no, I'm not.

Q. Are you familiar with Karl Home Video Corporation?

A. In the general sense, I knew that there was some entity with a name something like that.

Q. To your knowledge, did Karl Home Video Corporation provide goods or services to the '84 campaign?

A. Not to my knowledge and certainly not in contravention of any laws of the United States.

Q. Do you know if Karl Home Video sent a bill to the committee for any services rendered?

A. No, I do not.

Q. What involvement if any did you have in debt settlement negotiations after the '84 campaign ended?

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A. None whatsoever except to know that they were going on. My principal activity after '84 was to raise -- to go out and try to raise money to pay off and settle debts.

Q. Well, were the terms of settlement of debts ever discussed with you?

A. Not in any specific way. I may have been told at some time or other that efforts were underway with this vendor or this creditor to settle the debt. But I don't recall any specifics on any of them.

Q. Well, who had authority to do that then --

A. I don't know. If you mean legal authority -- do you mean legal authority or political authority or what?

Q. I mean who --

A. The officers of AWH, Inc., I suppose, or their designees.

Q. And do you know who those people were after the '84 campaign ended?

A. Not all of them. I think Mike Moore

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was still involved; James Dwinell I think was still involved; people basically that we have already discussed; Mr. Van Hove, I believe.

Q. Did you participate in discussions about the '84 committee's debts generally?

A. Of course, of course.

Q. But largely restricted to how to raise funds?

A. To raise money and settle the debts.

Q. Did you discuss any services or goods that may have been provided by Karl Home Video or by Stuart Karl with Stuart Karl at any time?

A. No, no.

Q. At no time?

A. Not to my recollection.

Q. Upon the conclusion of the '84 campaign, you just related that your major activity was raising funds to try to pay off the '84 debt. Was that your major activity?

A. In life? No, my major activity was being a United States Senator. What do you mean?

Q. Were there any other political

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activities?

A. Yes, I helped the Democratic ticket in '84. I went around the country and spoke a great deal and helped other candidates for office in '84, '85 and '86, a lot of other activities. My principal activity was to retire my own debt.

Q. And after the '84 campaign ended, were you at any time a candidate for Senate in Colorado?

A. Not an announced candidate. Up until I think January of '86, as I recall, I kept open the option of seeking reelection or running for a third term but decided, I guess about January, as I recall, that I would not do that and so announced.

Q. Did you raise funds for a Senate candidacy?

A. For myself? Not for a candidacy. I may have raised funds for an exploratory committee of some kind.

Q. After the '84 campaign ended, how was your transportation arranged generally?

A. I would walk out of my house and get in my car and drive to work.

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Q. And when you traveled out of town, how was it arranged?

MR. FOREMAN: Mr. Bernstein, are you talking about political events in particular or I assume as a United States Senator there was a lot of travel to various places both inside and outside the country.

Q. (By Mr. Bernstein) Well, presumably you traveled for different purposes; is that right?

A. Yes, lots of different purposes.

Q. And were the arrangements ordinarily made by the same person or people?

A. I don't think the word ordinarily applies. I traveled to the Soviet Union. Some people would be involved in that trip.

I would travel to Geneva. Other people were involved in that trip.

I would travel out for a candidate for office to raise money. Other people were involved in that. So the word ordinarily doesn't mean anything to me. There was no ordinarily.

Q. Who paid for the transportation when

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you traveled in the United States outside of Washington?

A. For what purpose? Different people for different purposes.

Q. Such as?

A. No, I think you've got to be more specific.

What trip? What purpose? And I'll tell you who paid for it. If it was a political event, a political committee, usually somebody else's.

If it was a fund raising event to retire my debt, somehow I suppose we incorporated the cost of the travel into the event.

If it was an honorarium speech, the host school or committee. So ordinarily doesn't mean anything to me.

Q. Who made the decision about which category any particular trip would fall into?

A. Nobody made a decision. They fell into categories automatically. There wasn't a group --

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Q. If invitations were issued to you, for example?

A. I usually made the decision. You mean to go give a speech? It would be brought to my attention and I would decide whether to do it or not.

Q. And if it were a debt reduction fund raiser?

A. If the people organizing the event thought it was worthwhile and convinced me that it was worthwhile and that there would be, in fact, some returns on the investment of my time and effort, I almost always said yes. I can't remember vetoing very many.

Q. Would you then tell someone that this trip would be paid for by AWH?

A. No, no.

Q. How did that happen then?

A. I don't know. I assume AWH, Inc., or Mr. Dixon, or Mr. Dixon in discussions with the host of the event or somebody would say, "Who's going to provide the airplane ticket?" but I wasn't involved in those.

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The day would come and I would be handed a ticket and I would go to the airport and go and ask for money in this specific instance or give a speech or whatever, but almost never was I involved in the logistics of it.

Q. Do you know whether Stuart Karl paid for trips in 1985 and 1986 that --

A. No, I do not.

Q. -- that you were on?

A. No, I do not. My understanding and instructions were that no one was to pay for any trip in any way that suggested a violation of the law or that was out of order with the legal requirements of these things.

Q. What I would like to do is to go through a series of documents to see if you have a recollection of any in particular.

MR. BERNSTEIN: What I'm handing you now, Senator Hart, and counsel, is a document that was provided by the committee, and if you page four or five pages into it, you'll come to a memorandum and it's dated April 24th, 1986.

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Do you see where I'm -- it's the fifth page of the attachment.

A. April?

MR. FOREMAN: The last page.

THE WITNESS: Yes.

Q. (By Mr. Bernstein) And in the context of the sheaf of documents I have handed to you, this appears to be a listing of trips during 1985 that you were on that Stuart Karl paid for.

In the context of this package it also indicates that two of the trips were billed to AWH at some point and the others were not.

A. Just so the record is clear, that characterization you made of what these documents indicate is your characterization. I don't necessarily subscribe to it, but in any case go forward.

Q. What I would like you to do, please, is to look at the first two trips that are listed, which are April 26 and April 28th, 1985, and the purpose is described as retreat. These are trips, round trips, from LAX to Orange County and return.

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A. Again I'll take your word that that OC stands for Orange County. I don't know.

Q. Do you have a recollection of what this trip was for?

A. I do not. It says purpose, retreat, but other than that I don't.

Q. I think you had described earlier when I asked you about the transportation the last two trips that are indicated there, do you see the December 5 and December 8th and abbreviation PAC RIM I believe refers to the conference that you were describing?

A. I think that's probably what that means.

Q. And do I gather, is that the only incidence that you can remember of being on a plane or a helicopter that was arranged by Stuart Karl?

A. I didn't know that any of these were arranged by Stuart Karl.

Q. Do you recall being on a helicopter or a plane with Stuart Karl?

A. I recall a helicopter trip I mentioned

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having to do with Pacific Rim, but I don't recall whether Stuart was in the helicopter or not -- whether Mr. Karl was in the helicopter or not.

Q. In instances where you traveled on planes that were not commercial aircraft, who paid for those planes?

A. Well, very rarely did I do that except if they were United States Government airplanes and only then under circumstances where I was assured by the staff that such transportation was in compliance with the ethics rules of the United States Senate and the laws of the United States.

I don't recall a lot of private air transportation. I do not recall a number of offers of transportation that were turned down on the grounds that they might -- even though they weren't literal violations of the ethics or the law, might seem to be, and that was the judgment that we would -- that we used throughout my twelve years in the Senate by and large, but I don't recall any specifics.

Q. Who would you have instructed to take

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care that this was in full compliance?

A. The entire staff, administrative assistant and everyone else.

Q. Would you have on occasion with regard to a particular trip asked a staff person to look into the propriety of it?

A. I think almost any time private aircraft was involved.

And it was a standing order. I didn't have to every time, but I think the understanding was every administrative assistant I ever had over the years understood that was our rule.

There were -- I think the Senate rules provided for reimbursement, that -- again I shouldn't get into the interpretation of those rules because I'm not an expert on it, but my understanding was that if the provisions were made for reimbursement that then it was permissible in general terms.

Q. Were you aware of the campaign finance provisions applicable to political trips paid for --

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A. Not in specific terms.

Q. Not specifically.

(Hart Exhibit 4 was marked for identification.)

MR. SCHNEIDER: Mr. Bernstein, how much longer do you expect this to take today? Do you have any feel for it?

MR. BERNSTEIN: At this point it's hard to say. Probably into the afternoon, but not much -- but not the whole afternoon probably.

THE WITNESS: I need to know that as soon as you know for planning purposes.

MR. BERNSTEIN: Yes.

Q. (By Mr. Bernstein) What I would like to do now, Senator Hart, is to show you documents and please just take a moment to review them since they are not documents that you've seen before and they purport to be flight logs from a company called Martin Aviation. The customer is described as Stuart Karl, and it indicates Senator Gary Hart plus four, presumably passengers on a flight on March 14,

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1986?

A. What kind of aircraft was this?

Q. A helicopter, I believe. Do you have any recollection of this trip?

A. I do not. Where did the trip -- where did it go?

Q. From Orange County to Los Angeles and back.

A. I'm sorry. Where does it say that?

Q. To some degree you'll have to rely on our mastery of the three letter airport names. SNA is Orange County. SMO is Los Angeles.

A. We just had another where OC was Orange County. Which is which? Is it OC or S --

Q. OC is a shorthand. It's a two-letter name. The three-letter are the airport designations.

A. And when did this take place?

Q. On March 14th, 1986.

A. Well, I see two dates. I now see in one corner March 7th, '86, and I see March 14.

Q. All right. Right. I believe that the lower date that's indicated there is the day on which

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the order was placed for the plane and that the upper left-hand corner date is the date the flight took place, which is confirmed down below by the log itself, the pilot enters indicating the date, 3-14.

A. And the question is?

Q. Do you have a recollection of this?

A. No, I do not.

Q. Do you know what the purpose of this trip was?

A. Not off the top of my head I do not.

Q. Do you know if Stuart Karl was ever paid by --

A. I do not.

Q. -- by anyone for that?

A. I do not. If he was required to be paid under any laws or regulations, I assume he was because that was my constant understanding.

Did this trip take place in the same day, down and return? Is that the idea? It's unclear whether it was one way or round trip.

And you're sure it was a helicopter?

Q. I believe so.

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MR. FOREMAN: Have you marked that one as 5?

MR. BERNSTEIN: I don't believe it's been marked yet.

(Hart Exhibits 5 and 6 were marked for identification.)

Q. (By Mr. Bernstein) Senator Hart, what I am handing you now is Exhibit 6 which is an additional invoice, and I apologize for the quality of the copy.

And I'm not sure I have given you the whole package.

(Documents were handed to the witness by Mr. Bernstein.)

MR. BERNSTEIN: Mr. Foreman, this also goes with that exhibit.

MR. FOREMAN: Also part of 6?

MR. BERNSTEIN: Yes.

(Documents were handed to Mr. Foreman by Mr. Bernstein.)

Q. (By Mr. Bernstein) This appears to be another helicopter trip, this time in September of

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1986, with apparently the passengers being Beth Smith and McKay Daines and Senator Hart.

MR. SCHNEIDER: I'm sorry, Mr. Bernstein. How do you conclude that Senator Hart by these documents was a passenger?

MR. BERNSTEIN: Let me explain how I determine that. The face of the document is an invoice sent by the company and under comments has three names, and on the flight log itself with the same date with the flight log number being the same as on the invoice three passengers are described.

MR. SCHNEIDER: Yet on the second page of the document, Executive Jet Trip Request, the names of the passengers are Beth Smith and McKay Daines, but Senator Hart's name not being included.

MR. BERNSTEIN: And I infer from the number of passengers listed as three on the log itself which I understand is what the pilot enters on that page --

MR. SCHNEIDER: Okay, so what you are saying -- you're inferring that there were three passengers and that one of them was Senator Hart.

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Q. (By Mr. Bernstein) I don't know this with a certainty, Senator Hart. The document seems to suggest that, and I'm asking you.

A. The document seems to suggest that. You think it does.

Q. I think the document seems to suggest that, yes.

A. Why then does my name not appear on the list of passengers on this trip request? I don't recall the trip at all. I could not say this with some deference to Mr. Daines, but I can't place Mr. Daines in my mind. I certainly don't remember taking any jets, helicopters or executive jets with Beth Smith and Mr. Daines.

I'm not saying it didn't happen, but I have no recollection whatsoever and reasonable people can differ as to what inference to draw from these documents.

Q. If you have any recollection of this trip, you don't know how it was paid for --

A. Of course not.

Q. -- or who paid for it or anything like

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that?

A. No, I do not. The same answer would apply in all of these. My instructions to Senate staffs and campaign committees was to comply fully with the law.

Q. There are three more trips that I would like you to look at, and I haven't a clue whether these would be easier to fathom or not.

These are in the form of schedules that were prepared for you and I'm hopeful they can refresh your recollection a little better than the quite frankly cryptic trip logs that we just looked at.

MR. BERNSTEIN: This is Exhibit 7.

(Hart Exhibit 7 was marked for identification.)

A. Do we know what year this was?

Q. (By Mr. Bernstein) No, we don't, and it's one thing that I would like you to look at to see if you can shed any light on that.

A. This makes no sense at all, frankly, because the trip, as this schedule indicates, has me

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overnighting on the 23rd of March, year unknown, to Austin, Texas, presumably, and starting the morning of the 24th presumably of the same year in Gainesville, Florida, with no indication of how I got from Austin, Texas to Gainesville, Florida, overnight. So I find it totally incomprehensible.

Q. All I can say is this is the form the documents were provided to us.

A. It just proves the point that not every schedule got carried out as typed. You understand what my point is here?

Q. I think I understand it.

A. No, I mean specifically on this one. You see the bottom of the second page has me in Austin, although it doesn't say what state, and I presume that's Austin, Texas, and starting the next morning in Gainesville, Florida, which makes no sense at all. No sense at all. My guess is that this is a draft schedule that got messed up somehow.

Q. Let me point you to a couple of areas on the form. Do you see, Senator, the numbers on the

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bottom of the page?

A. Yes, I do.

Q. These are the numbers that counsel has referenced in the subpoena response. In the schedule on the page that's marked 75 it indicates that you were en route to Austin, and the pilot's name is Ted Baseo along with a tail number.

Would one infer that that's a private plane and not a commercial plane?

A. I wouldn't infer anything. I don't know.

Q. On the bottom of the next page that's numbered 76 it says depart for Orlando by private plane?

A. Um-hum.

Q. In that instance who would have paid for --

A. I don't know.

Q. But is that something -- when you were transported by private plane, is that something you would have inquired into --

A. No, not every trip.

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Q. -- the propriety of it?

A. Not every time. The standing rule was nothing in violation of Senate ethics or campaign laws, period, was to be undertaken.

Q. But did you ever leave it to other --

A. Well, of course, as most senators do and most national candidates do and the realities of life are such that one neither has the time nor attention to resolve all these questions one's self, and I think virtually anyone in Congress of the United States would say the same thing.

Q. Do you have any notion --

A. I understand, of course, that neither the campaign laws nor the Senate ethics prohibit transportation in private aircraft as such? Is that your understanding?

Q. Can you give us your --

A. Could I ask you to answer the question? Is it your understanding that neither the laws of the United States nor Senate ethics prohibit transportation in private aircraft?

Q. At this point, frankly, I would rather

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not get into the rules that apply or don't apply.

A. You same to be inferring that every -- that there was something questionable about being in private aircraft, and I'm just trying to get a common ground of understanding.

Q. I wasn't trying to suggest that. I was just inquiring whether this is something you would infer if because private aircraft was something usual, that you ordinarily travel by commercial aircraft.

A. That's true of everyone.

Q. I certainly wasn't trying to suggest in the thrust of my questioning that there was something per se improper about it.

A. Precisely.

Q. Do you have an idea again of what year this might have been?

A. In 1986 I gave some lectures at the University of Florida in Gainesville where I had been independently on other occasions, but what I can't figure out is whether this was one of those sets of lectures.

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If it was, it was the spring of 1986, but the schedule is so confused and makes so little sense to me logistically that I have to believe this was a draft that never was used for the principal reason that I cited earlier, that I am scheduled here overnight in Austin, Texas, and start the next day in Gainsville, Florida, so I think somebody was messed up and this was one of the schedules that never was used actually.

Q. Well, actually the difficulty is that the date of the second page of the document is not indicated because, as you know, March 23rd actually ended on the schedule on the previous day.

A. If I may say so, this is a problem generically with these schedules and drafts were done and sometimes put in files --

MR. FOREMAN: I would also state for the record that in terms of the manner that documents were put together and submitted to the Commission, we did not try to order them beyond the manner in which we found them.

We numbered them consecutively as

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they appeared to be numbered in the files as they appeared to us when they were located. Now, it would appear to me having not been in Florida or Austin, Texas, during any of the relevant years, that there's a strong likelihood that the page that is denominated page 75 doesn't, in fact, bear any relationship to any of the documents here.

It certainly doesn't seem to follow sequentially, and I additionally note that there are some numbers in the upper right-hand corner of these documents which but for the second page of the packet appear on some level to be consecutively numbered, so it may well be that this is a conglomeration of documents from different times and places that bear no relationship one to the other.

MR. BERNSTEIN: It may be well be that the Florida trip took place as indicated on here, but somehow the pages got confused before they were reposed in the committee.

MR. FOREMAN: I would suggest that's as possible as anything else.

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MR. SCHNEIDER: Or vice versa.

MR. FOREMAN: Or vice versa.

Q. (By Mr. Bernstein) And I think you had stated that you thought it was 1986 these are the series of lecture tours?

A. I said if that, in fact, is part of the lecture tours, it occurred in '86. I didn't say I thought it was '86. It's premised on the if.

Q. Okay.

A. Let me hesitate. I think those lectures were given in '87 -- no, I think -- no, I think it was '87. This could well have been '87. I'll have to go back and check my own records as to when those lectures were, but I think it was after -- I'm almost positive it was after I was out of the Senate, which would have to be the spring of '87.

What's confusing is I had been to Gainesville before to give talks.

(Hart Exhibit 8 was marked for identification.)

Q. (By Mr. Bernstein) Here is yet

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another schedule. And again the first burning question is --

A. What year?

Q. -- what year.

A. Well, it's the spring, we know that. I could remember doing some events on this schedule, but the schedule generally doesn't ring any bells. Clearly jumping around a good deal.

Q. Do you know what year you might have engaged in a lot of, quote, prospecting, unquote?

A. Yes, '74 and '80, 1983 and '84 and 1986 and '87.

I can remember being on a KUP show. I can remember being at some of these events, but it doesn't -- it doesn't anchor in time.

This is a campaign schedule, but it doesn't make any sense to me.

Let me, if I may, underscore another point. It doesn't help make your job any easier, but often schedules were drawn up and presumably made their way into files that were never implemented and I cannot on any of these cases

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verify that any of these are actual schedules which were carried out. I'm sorry I can't be more helpful.

Q. Is there some way that through other records you could determine what year this was?

A. Not through other records. I'd -- somebody would have to make some phone calls to some of these people and say do you remember hosting a fund raiser, and when did you do it?

We had a habit -- not a habit, but we had a practice in the Senate office of drafting -- there were three sets of schedules. One was called the block schedule which was -- got that name from the calendar blocks and they are often printed in block form with a date in the corner and somebody would pencil in events and that would be usually monthly or sometimes 90-day schedule, block schedules.

Then we would have a weekly schedule, which is what this is, which purported to outline the events of the week and then there would be a daily schedule of that which would be an

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extrapolation of each of these individual days that I would carry around with me in my pocket to keep current.

I rarely carried a weekly schedule because it changed too much. This seems to me to be the kind of schedule that would have been drawn up maybe two to four weeks ahead of this week, whatever year it was, which would then have been sent to me for my okay. And generally I would either orally say Elsie, fine, or Bill, fine, or do an "OK, GH," and hand it back.

I don't see an, "OK, GH," which was my usual practice.

I think this was probably -- well, I don't know. I just don't know. I rarely had this hectic a schedule when I wasn't running for office and in '85 and '86 I was not carrying on in this hectic a manner so I can't -- so I'm confounded by this.

Q. It's certainly unlikely it would have been '84 though from the --

A. Well, yes -- well, I wonder.

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That's --

Q. You would have been in California in late May of '84?

A. Well, yeah. I just don't know when it would have been. The likelihood was the Senate was in session also which also confuses me more which would have made it difficult to be '85 or '86 so I can't be helpful.

Q. Let me have you look at -- although it's not likely to bear fruit but in order for you to understand the point of this, at the top of page 2 of that schedule, it indicates a fund raiser hosted by Nancy Pelosi and then it reads at 8 p.m. depart San Francisco in Stuart Karl's plane. And I guess I assumed since you can't recall the year that --

A. I don't recall the trip, and it may or may not have occurred.

Q. And the reality is, just so we have a full understanding of this, for all you know all of these trips might have been paid for or not paid for or whatever; is that right?

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A. Well, I assume they were paid for. I mean that was my instruction. I think the burden rests frankly on anyone who would suggest they weren't paid for.

I never remember having -- I know Mr. Landau, but I never remember having dinner at Nate Landau's. I don't think I ever have in my life. Not to say I may not have, but I don't remember.

I do see a Democratic caucus lunch, which would probably suggest I was in the Senate but I can't -- I can't vouch that this schedule was ever carried out.

Q. If it were 1985 or 1986, which do you think would have been more likely --

A. I have no idea. There's nothing in there that triggers one year versus another.

MR. BERNSTEIN: We have one more like this and then we'll take a short break.

(Hart Exhibit 9 was marked for identification.)

Q. (By Mr. Bernstein) Exhibit 9 is yet

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another schedule, undated at least by year, that is a Florida trip, November 10th.

A. I remember speaking to the American Magazine Conference, and this would have been I think either '85 or '86. I remember going from that speech to New York.

I didn't recall it was JFK here -- JFK presumably -- in a private plane. There were a large group of people in the plane, as I recall, up to a dozen or so people, and the plane I know was scheduled to go to make the trip as those other people were going. I did not recall it was a Lorimar plane.

Q. Were you suggesting that on this leg of the trip that you had joined other people whose plane it was --

A. I'm not suggesting anything. I'm just reporting what I recollect. The plane was taking -- I don't recall anything up to this, but I recall from Orlando to New York the plane was going to take a group of people and, as I recall, it was -- it seemed close to a dozen people and I was offered the

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opportunity to go along. I certainly was not alone in the plane and there were people who were pursuing their own schedules.

Q. You don't have a recollection of the first leg on the Lorimar jet that's been referred to on the first page.

A. No, I do not.

Q. Can you narrow this down to 1985 versus 1986?

A. I can't. The only way I could do that is to try to remember why I went to London, and I don't recall. I think I went to London -- I went through London to Geneva in both '85 and '86 for the SALT talks, and this may have been one of those trips. It's clearly the fall, but I don't know what the trip to England would have been for or whether it was in transit to somewhere else.

MR. BERNSTEIN: If that is all you can recollect about this, we will now take a five-minute break and go off the record.

(Recess.)

MR. BERNSTEIN: On the record.

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Q. (By Mr. Bernstein) Senator Hart, do you know a gentleman named David Stein?

A. Yes, I do.

Q. When did you first meet him?

A. I don't recall. My guess is '82 or '83, but that's a pure guess.

Q. Do you know how you were introduced?

A. I do not.

Q. Can you describe your relationship with him as it started and as it developed?

A. Not in the abstract. He was one of a large number of supporters.

Q. Was he a personal friend?

A. As opposed to what?

I assume he is.

Q. Have you had social occasions with him?

A. Yes.

Q. Was he active in your 1984 campaign?

A. Yes.

Q. Do you recall what the nature of his activity was?

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A. General support, fund raising, political organization, again not distinguished from dozens if not hundreds of others in nature.

Q. To your knowledge, did he have a title with the campaign or --

A. I don't believe he did.

Q. He did not act in any official capacity?

A. No. Now, there's two different questions. I have already said several times that titles were not particularly important in our campaign. I don't know what official capacity means. I don't think he was authorized to sign documents for the campaign and that of thing if that's what you mean.

Q. Are you familiar with a sale/leaseback transaction that Mr. Stein engaged in with the '84 committee?

A. No.

Q. Did Mr. Stein ever discuss fund raising or fund raising methods with you?

A. Ever is a long time. In the grand

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sweep of your questioning, I assume the answer is yes, but any specific detail, none that I can recall.

Q. In your '84 campaign did you discuss fund raising activities with him?

A. Yes. I said, "We need money."

Q. Is he someone who raised a lot of money for your campaign?

A. How much is a lot?

And at what time? Nobody raised a lot of money before New Hampshire.

Q. Do you know what if any relationship David Stein had with Stuart Karl?

A. No, I do not.

Excuse me. The name that I just recalled that I couldn't earlier was Manny Morris Dees. I mentioned names that came off the top of my head. Among others was Manny Morris Dees. It had to do with who was raising money.

Q. Do you recall having contacts with Mr. Stein after the 1984 campaign ended?

A. I recall having contacts with him. I don't recall specific contacts.

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Q. Were they social contacts?

A. As opposed to what?

Q. Were they political contacts? Were they business contacts?

A. Well, since I was not in business, I doubt they were business. I would suppose they were either social or political or both, but I'm sure you know national politics well enough to know that it's awfully hard to segregate the two.

Q. So you didn't consider him a personal friend?

A. As opposed to what? You define personal friend and then I'll tell you. You defined it before as someone I saw socially, and in that sense yes, he was a personal friend, but on the other hand so were thousands of people. How personal is personal and what relevance does it have to this inquiry?

Q. After the 1984 election did you consider becoming a candidate for the 1988 Democratic presidential nomination?

MR. SCHNEIDER: I'm sorry. Would you

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repeat that question?

(Discussion off the record.)

Q. (By Mr. Bernstein) Would you repeat what you said?

A. I did, in fact, become a candidate in 1988 and therefore the facts assume the answer to the question.

Q. You announced your candidacy in April of 1987; is that correct?

A. That's correct, the first time.

Q. When did you first consider entering the campaign?

A. I have no idea.

Q. Was there an organization formed to test the waters for a presidential campaign?

A. I believe there was; I believe there was in compliance with the law.

Q. And who was in that organization?

A. I'll have to go back and refresh my recollection. By and large, a very small number of people who were active in '84, I believe, but I cannot at this time give you the specific names or

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titles. I think it's a matter of record actually as to who the officers of that committee were.

Q. When was it established?

A. I can't recall. I think that's also a matter of record. I think you have to file papers, as I recall.

And, as you well know, given your capacity, it's almost obligatory to file such papers or to form such a committee as a protection if one is giving any thought whatsoever to the national race. I think it's standard procedure, I believe.

Q. My question is do you recall when approximately you began to test the waters for the campaign as distinguished from when you actually announced your candidacy?

A. Define test the waters.

Q. When did you begin deliberating over whether or not you should enter the campaign?

A. I would suppose, without being terribly facetious, the night after Walter Mondale lost the election, but that question is no -- that answer is no more valuable than the question.

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The fact is, you can't pin down a day, a date, a week, a point in time when you began to think about it, and if you could be a little more specific, I could probably be a little more helpful. What is it you're trying to find out?

Q. What activities did you undertake in deliberating over whether or not you should become a candidate?

A. Talked to people, talked to my family, thought about the issues, read a great deal, traveled a great deal.

Q. What sort of travel?

A. International travel, national travel. I've been in and around politics for 15 years and I have never known what testing the waters meant. It's a 19th century phrase which has little validity in the late 20th century.

Q. Were there meetings to discuss your entrance into the presidential contest?

A. Sure.

Q. Who participated in those meetings?

A. My wife, my son, my daughter, friends,

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former supporters, potential supporters. Sometimes the meetings took place at restaurants; sometimes they took place during car rides, on airplanes. Sometimes they took place in the Senate office, Senate dining room.

Q. What particular people can you remember aside from your family that participated?

A. I would suppose mostly the people that were active in '84, a lot of them. How lengthy do you want the list to be? I would probably give most of the names that have occurred already in this interrogation, not all but most, probably a lot of others.

Q. You stated that the activities that you undertook included discussions and travel both domestic and international.

What activities did others take on your behalf?

A. I have no idea. I assume they held meetings and talked to each other, and since one of the conditions for making another race was progress in resolving the debt from the previous race, I would

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think all of those activities having to do with fund raising to retire the debt probably played some role in all this, but I can't account for all the activities of other people in pursuing this possibility.

Q. I was trying to get to activities that you were aware of.

A. I was aware there were activities, but I can't give you a time or a place or a date or names or --

Q. Do you recall particular people who engaged in these activities?

A. Many of those that we've already mentioned.

Q. To your knowledge, did Stuart Karl engage in these activities?

A. Not specifically. I don't rule out the possibility that he did, but I don't know of any specific role that he played.

Keep in mind we are talking now about again hundreds of people, not dozens even. Unlike '84, this potential race involved an awful lot more

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people and therefore my knowledge of specifics was even less than it was, say, in '83.

Q. Was David Stein involved --

A. I presume he was; I presume he was. And there were probably occasions when I asked his judgment as to whether I should run and would he support me if I ran.

Q. And again what were the nature of the activities others would have engaged in?

A. Again, holding meetings, talking to each other, helping raise money to retire the '84 debt, trying to solicit the support of people who were not supportive in '84. Kind of a generic answer, but it's a generic question.

Q. And how were these activities paid for?

A. I would presume most of them didn't require to be paid for. I mean if you go to a coffee shop and you get coffee and a doughnut and you talk, I would suspect most of the time people went Dutch.

Q. How about the travel that you discussed, you know, talking to people --

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A. Oh, I would usually -- if I would get together with my supporters anywhere, it was usually around an honorarium speech or a nonhonorarium speech or some other business that I was -- Senate or other business that I was traveling on.

In other words, if I would go to Cleveland to give a speech, I would get together with Oliver Henkell and his wife and they would get some of their friends together and I would talk about the issues today, but often the meetings were not political. They were issue oriented.

I got to be known, I suppose, as kind of issue oriented. I would not get in the Henkell living room in Cleveland and say, "I'm thinking about running for president in '87. Will you support me?"

I would say, "I continue to be concerned about the U. S. relations with the Soviet Union or the Reagan policy on arms or the deficits or the trade problems. Here is what I think we ought to do."

I would answer questions in regard to

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that.

Occasionally someone would say, "Are you thinking about running for office again?"

And in an effort not to be overly cov, I would say, "Yes, I'm thinking about it. I won't make a decision until probably '87, but if I run, I would like to have your help."

And that's generally the way it would go, and sometimes you would go out for dinner or sometimes -- who paid for the dinners? You know, I suppose one person or another.

There was not much money -- I mean there was no money. Any money that was raised during those early months in '85 particularly went to pay off the '84 debt.

And when I would travel, it would occasionally be a fund raising activity for debt retirement around which talks would be held about these issues and whether or not to mount another national candidacy, and I was generally undecided during this period.

Q. What's your best estimate of when

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these sort of discussions and activities began?

A. All of '84 or after the election of '84.

Q. So you were actively discussing with people --

A. Actively is your word.

MR. FOREMAN: Occasionally.

THE WITNESS: Occasionally, not systematically.

Q. (By Mr. Bernstein) Was there a time when the occasions came to be more systematic?

A. Yes. Sure.

Q. And when was that?

A. As time went on. I did not decide to run for president until sometime in March of 1987, and I decided.

Q. What I'm trying to explore in a general way is when the activities picked up which you were just describing, you know, earlier that you and others were engaged in canvasing opinion and talking to people and enlisting people's aid and that sort of thing.

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A. Yes.

Q. And I understand the points that you're making that to some degree it was an issue that was posed immediately after the 1984 election, but what I'm trying to find out beyond that somewhat abstract point is when did the activities develop into something more than that.

MR. FOREMAN: Why? I think the witness has also indicated that there was a time when an exploratory committee was formed, and I think it would be reasonable to assume that in connection with the formation of the exploratory committee that the activities increased.

Indeed, it would seem to be one of the purposes of the exploratory committee.

THE WITNESS: You could help me by telling me what you're after here.

MR. SCHNEIDER: What Mr. Bernstein wants you to do is conclude at what point in time your activities reached that threshold when you should have formed a committee.

THE WITNESS: Who decides that?

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MR. SCHNEIDER: And --

THE WITNESS: I don't think the Senate or the Congress of the United States gave the CTE the power to make that decision.

Why don't you just ask me that question and I'll say that if that's what you are trying to get at?

MR. BERNSTEIN: You are prejudging so let me backtrack a little bit.

THE WITNESS: That's because I don't know what you are trying to find out here.

Q. (By Mr. Bernstein) What is apparent is that at a point in time you were running for president in 1984 and at points in time you were considering the question of whether or not to run for president in 1988 --

A. Right.

Q. -- and at a point in time you decide -- well, let me before we even go into that -- at a point in time activities in which you were engaged in to decide whether to run increased in pace, in volume, in some measure --

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A. Incrementally, incrementally. What is it you're trying to find out? I'm puzzled by this. I don't know what you're trying to -- we formed an exploratory committee at such point as we felt the law obliged us to do so, not before, not after.

Q. And when was that?

A. I don't recall. It's a matter of record. Your documents I'm sure show when that date was.

If they don't, I'm sure you can find out.

MR. BERNSTEIN: Off the record for a second.

(Discussion off the record.)

MR. BERNSTEIN: On the record.

Q. (By Mr. Bernstein) I have been asking questions and I'll continue to ask questions about activities that you and others engaged in with a view toward determining whether you should become a candidate.

This is a matter that we view as being within the scope of the Commission's investigation

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and what I ask is simply that you answer to the best of your ability to the extent that you can recall.

A. I can't answer to the best of my ability if I don't know what it is you are trying to find out, and I don't.

Q. What I prefer you do is simply try to respond to the factual questions that I'm asking without --

A. But you are not asking factual questions. You are asking vague and more just general questions. When did I hold meetings? Who paid for the meetings? This is the world and all that's in it. Ask me some specific questions and I'll answer that specifically.

I did not decide to become a candidate until sometime in March of 1987. We felt it was in compliance with the law and the better part of discretion to form an exploratory committee because the possibility -- the strong possibility existed or the possibility existed that I might decide to do that. I also might have decided not to do it.

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Q. And do you recall if the exploratory committee activities took place for several months before you announced?

A. They took place from the time the committee was formed and the papers filed, and that is a matter of public record.

Q. There are no papers filed, Senator Hart.

A. All right. When the committee was formed. We'll find out whatever date that was and give it to you if you don't know, but the committee was formed when we thought it was appropriate to form it, and if there is some suggestion that it should have been formed earlier or later, I'm open to hear that suggestion based on some concrete facts or evidence.

You're struggling here because of a vagueness of our system which is the people don't decide in an instant at a phase of the moon on a Thursday to run for president. It is a process.

And, therefore, in that process you have to make judgments as to when to establish

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certain standards for yourself and for the law, and so long as our system is the way it is, I'm afraid you're not headed in any productive direction.

Q. So you don't have a recollection of even approximately when these exploratory activities began to be conducted?

A. What are "these"? You mean when did I talk to somebody about running for president?

Q. No, no, no, when the exploratory committee was formed.

A. When the committee was formed. I'll get the date for you and give it to you. I'm surprised you don't have it, but we'll find it out for you.

Q. Do you recall that once the exploratory committee was formed --

A. Keep in mind that during much of this period I was also trying to decide to run for United States Senator, so it was kind of a complicated arrangement here.

Q. Let me finish my question. Do you recall once the exploratory committee was formed that

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at that point in time a substantial part of your activities were involved in --

A. What's substantial? I was a United States Senator. Plus the substantial part of my activities was being a United States Senator Hart, to the best of my ability according to the oath of office which I took upon entering office.

Q. Well, do you recall what sort of things the exploratory committee began paying for?

A. No, I don't.

MR. BERNSTEIN: What we will do now is to go off the record for 20 minutes and to resume at 12:30.

* * * * *

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AFTERNOON SESSION

2:45 p.m.

MR. BERNSTEIN: On the record.

Q. (By Mr. Bernstein) Senator Hart, before we broke we were talking about the exploratory activities you and others engaged in before you announced your candidacy.

Do you recall that these exploratory activities increased after the formation of the exploratory committee?

A. Only in the sense that as a general proposition, and particularly where I'm concerned, I resisted the highly visible preparation to run for president while another election was underway, namely the fall election of 1986, and on the grounds that I always thought it was unfair for people who were seeking national office two years later to compete for the attention, financial support and political support with those who were seeking election in the off year, in this case 1986, so I think the answer is that after the November -- after the election in November of 1986 I would

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suppose that activities did increase.

Q. At that point you were still in the Senate; is that right?

A. Yes, until January of '87, but at that point we're talking about a 60-day period, perhaps.

Q. Your recollection then is that this exploratory committee was formed after --

A. No, I don't know exactly when it was formed, as I said before, but I do recollect that activities intensified, to use their phrase, after the election of '86, but also conditioned by the holidays, Thanksgiving, Christmas, New Year's.

Q. Are you familiar with something called the cabinet program?

A. No.

Q. I asked in part because earlier, although you didn't use those words, I think you described an organization of individuals that may have either been formed or groups of individuals who were, you know, recruited with the possibility of your future candidacy.

A. I think the only time we talked about

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that was how a person like Mr. Karl and Mr. Stein would have gotten involved in the campaign and I was just explaining that if you had a name, you asked that person to collect their names and then you discussed the issues and positions with them, and out of that group might come one or two people who in turn were asked to do the same, but that's basic political organization, I think.

Q. And you don't remember then a particular program of assembling individuals who were your supporters and who would continue to support you in the event you announced?

A. Not in the sense of having regular meetings or membership or anything of that sort.

Q. What I would like to do is to show you a couple of documents, some of which you may have seen previously and some not, to see if maybe your recollection might be refreshed a little bit.

(Hart Exhibit 10 was marked for identification.)

Q. (By Mr. Bernstein) This is a memorandum addressed not to you, Senator Hart, but

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Bill Dixon, David Stein and Mike Novelli from Bill Shore in October of 1985 entitled, "Other Potential State Cabinet Leaders."

A. That's the first time I have ever heard the phrase state cabinet. To my recollection I've never seen this memorandum before and I'm not familiar with the use of the phrase state cabinet.

Q. Or any kind of cabinet organization or program?

A. Not that I can recollect. It's not to say that somebody didn't use the word in my presence, but I don't remember any intensive effort built around that phrase or word.

Q. Do you see the reference in the second paragraph of that letter -- and I'm reading now the last sentence -- "In several cases I've included" -- this is Mr. Shore speaking of the listing of individuals -- "someone's name not because of their fund raising abilities but because of their stated and proven willingness to work hard for GH at this early stage in the 1988 cycle."

A. Yes. I see the sentence.

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Q. What's the meaning of that?

A. I think you'd have to ask Mr. Shore. I didn't write it.

Q. Was that an indication at least that Mr. Shore viewed these activities as being directed toward the 1988 campaign?

A. Again you'd have to ask Mr. Shore. The 1988 date is a date in there, but as to what Mr. Shore's intentions were, you'd have to ask him.

(Hart Exhibit 11 was marked for identification.)

Q. (By Mr. Bernstein) Exhibit 11 is another memorandum dated in September of 1986, and it describes, "Southern California Cabinet Meeting," and this is -- again it's addressed not to you but to Richard Wagner from Rick Reiter.

Do you recall attending the proposed meeting that's described in this memorandum?

A. All of '86 -- not this one specifically, no, I don't. I could well have; I could well not have. Also, the Senate was in session. I may or may not have gotten to this

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meeting. I don't recall it.

Q. Well, do you recall -- and I'm now paraphrasing -- in the middle of the memo -- do you recall recognizing certain individuals for achieving the position of, quote, directors for California?

A. No, not if I don't recall being at the meeting I don't. I must tell you my own style is not big on titles, honorifics and so on.

Q. I would ask you also in the second paragraph it says, "Prior to GWH arrival" -- and I assume that refers to you -- "John and I" -- and I assume that refers to John Emerson who you'd earlier described --

A. Yes.

Q. -- "will brief the room on Cabinet on activity from this summer, as well fas an overview on political activity within the Hart organization."

If this is now September 1986, can you tell me what Hart organization is referred to in that?

A. No -- well, my guess is that that phrase is used very loosely to mean network of

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friends and supporters.

Q. You think it was not any formal organization?

A. Oh, no, not unless there were papers filed at this time. We may have had our -- I mean our committee formed. We may have by this time. I don't recall.

Q. This was still a couple of months before the elections in November.

A. Yes, yes. On the premise that we're still barking up this tree that I was seeking the presidency and hiding it very well, I think it's important to note that I was criticized after I did announce for the presidency in April of '87 by much of the political organization, party organization, in Iowa for not having spent more time in Iowa in '85 and '86. So if I was busy running for president, as your question seems to assume, I think I would have been spending a lot more time in Iowa.

That's a matter of public record, that criticism.

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(Hart Exhibit 12 was marked for identification.)

Q. (By Mr. Bernstein) Exhibit 12 I'm now handing you then is another memorandum, and this is one that apparently was written to you from Richard Wagner in October of '86 referring to another cabinet meeting, quote, unquote, this one the Northern California cabinet.

Does this refresh your recollection about the cabinet business?

A. No, it doesn't.

Q. Do you remember attending a meeting like this?

A. No, I do not. I could very well of. I know most of the team people here and I know their names. 49 seems like a rather large number for any of our events at the time, but it's not out of the question.

Q. The individuals who are listed as, quote, directors on the top of the second page, are all those individuals very familiar to you?

A. Yes. I have hesitancy about Gordon

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Feller, but the name I generally recall and he's the only one I have trouble putting a face with. I'm sure I wouldn't if I saw him.

Q. So I gather I was unsuccessful by showing you these in refreshing your recollection about a cabinet program?

A. The name doesn't set off any special signals in my mind, no. It could have been a word, a phrase used by people who were helpful in preparing for an '88 race among themselves, but it never dug itself into my mind as anything of special significance.

Q. Well, do these documents that we just discussed refer to then exploratory activities for your 1988 candidacy?

A. If exploratory is meant to be keeping open the option of running for president, yes. I had not decided to run for president at this time and I think any person that knows anything about national politics understands that you don't wait until the year before the primaries, decide to run for president and then make contact with your friends

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and supporters. In my memory it's never happened.

Does this line of questioning suggest that's there's something illegal about meetings of this sort?

Q. What I'm trying to ascertain because earlier you said that my questions were far too vague on what activities were involved to be exploratory, and I'm trying to question about what those activities were.

A. Right.

Q. And there may be consequences beyond the meetings. We don't know that yet. We want to know what happened.

A. What happened is I told you at the outset of this questioning meetings were held around the country to discuss the possibility of running. I have already said that, but my question to you is: Is this considered illegal somehow?

(No response.)

A. Does silence mean --

Q. (By Mr. Bernstein) The silence indicates that I'm not going to answer your question.

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A. Why not?

Q. I'm not going to answer your question because I much prefer if the posture that you adopt is simply to respond to my factual inquiry --

A. I'm sure you prefer it --

Q. -- and not to question the motives or the direction or the reasons why I'm asking particular questions.

A. I'm sure you prefer it, but I have a right to know where you're headed and why. I mean if you think these meetings were illegal, I have a right to know that, don't I?

Q. The simple answer to that is not in the course of this deposition.

This deposition is intended to be a fact finding. It's not intended to be to -- for any legal conclusions to be drawn.

You should know, by the way, that since the Commission has notified you of its reason to believe findings in this matter that the Commission has not received any legal argument or factual submission other than the subpoena response

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on your behalf to explain what these activities were or your contentions which you voiced that there was no problem.

A. I don't know whether there was a problem or not since I don't know what you or the Commission thinks is legal and illegal.

Q. What I was trying to suggest is that it's premature at this stage for inferences to be drawn about what the Commission thinks or doesn't think since what we are trying to do is to find out what happened, and at this point my questions, we feel, are within the scope of the Commission's investigation.

A. I'm sure they are within the scope of the investigation. The question is whether they are within the scope of the authority.

Q. What I would like to do now is to show you some additional materials that go both to the question of what exploratory activities you engaged in and also to the question of when was your decision to actually become a candidate.

A. I have already answered the second

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part of that question.

MR. SCHNEIDER: And you have been using the word exploratory and, as we know, that has a meaning within the confines of the law that you deal with.

Maybe rather than using that word you could either define the word or use some other words because it leads to a legal conclusion that I don't think that we should be in a position of having to make at this point.

What is the definition of exploratory?

Q. (By Mr. Bernstein) This is where we started off, Senator. The question I asked was what activities did you engage in in order to determine whether you should become a candidate?

A. And I answered that question.

Q. Activities that are engaged in in order to determine whether one should become a candidate are exploratory activities, and if you're upset by my use of that shorthand term, it's certainly not intended to -- you know, for an iron fence or a negative inference or other inference to

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be drawn from it. What I'm trying to find out is --

A. Does that include discussions with my wife about running for president? Is that exploratory?

Q. What I'm more interested in finding out is whether this letter that I'm about to show you reflects exploratory activities.

MR. BERNSTEIN: This is Exhibit 13.

(Hart Exhibit 13 was marked for identification.)

Q. (By Mr. Bernstein) And this is a letter apparently from you to David Stein in February of '86.

A. Yes.

Q. And I refer you to the second sentence of the first paragraph which says, "I can't tell you how valuable it is to have your participation in the early strategic planning that will be so critical to our future efforts."

Can you tell us what sort of strategic planning you refer to in this letter?

A. Retirement of the '84 debt, discussion

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of issues affecting the future of the country, how effectively I might contribute to the Democratic Party and its candidates in '86 and beyond.

I'm sure there were other topics as well.

Q. Well, do you exclude the possibility that the strategic planning you were referring to is strategic planning for a 1988 candidacy?

A. It may also have included that, yes, but that doesn't mean exclusively that's what it was. Our future efforts were to contribute to the future of our country.

Do you assume that we only talked about the '88 campaign?

Q. No, my question is if -- this is a letter dated February 24, 1986?

A. Right.

Q. In which you describe that Mr. Stein has been very helpful in early strategic planning which you have just said --

A. Critical to our future efforts.

Q. -- which you just said probably, if

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I'm restating what you said right -- includes strategic planning toward 1988?

A. Could well have, but it also included retirement of the '84 debt, campaigning for candidates in '86, discussing issues affecting our country, how we all might contribute to our party and our country's future. Could well have included discussion about the '88 race.

Q. So the strategic planning that was directed toward the '88 race would have been part of the exploratory activities that you engaged in?

A. No, it would have been part of an overall discussion about all those other things that I talked about. That's what our future --

Q. One of which -- and am I mistaken, one of which I think you just said was --

A. I said it could have been. It could very well have been, but not exclusively.

MR. FOREMAN: If I might interject? I mean, I hate to see it when people get all tied up in semantics, but there's a perception on this side of the table whenever you use the word exploratory

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in the context of anything that Mr. Hart did prior to his actual formation of an exploratory committee that there is an inference that there is some sort of a foul about that, and I'm not so sure that you mean that by your choice of language.

It might well be that you are suggesting that virtually anything that Mr. Hart might do that involves discussions about the possibility of running for the presidency in 1988 is in some generic sense exploratory, and I think that some -- we may just be talking past each other here because of the use of language.

MR. BERNSTEIN: Well, I think what -- at the risk of descending too much into what, in effect, is legal argument which, you know -- you folks have a chance to present legal arguments to the Commission.

Under the Federal Election Campaign Act and under the Commission's regulations, there is a consequence to activities that money is spent on that involve future candidacies.

THE WITNESS: Even for five minutes

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out of a weekend? I mean how do you decide that?

MR. BERNSTEIN: We haven't decided anything.

THE WITNESS: I mean generically.

MR. BERNSTEIN: What I was responding to was the suggestion that it's somehow wholly improper for us to be suggesting that something that took place before you formed an exploratory committee might have been --

THE WITNESS: Let me tell you something --

MR. FOREMAN: Exploratory within the meaning of the law. Well, at least then we are reading you correctly.

THE WITNESS: I will restate two very important propositions which I have made over and over again. I did not decide to run for president of the United States in 1988 until March of 1987.

Second, I purposefully and consciously deferred organizing that effort or the preparation for that effort until after the 1986 campaign. That does not mean that discussions did not go on as to

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the possibility of running for president in 1985 and '86 in the manner that I have discussed.

Q. (By Mr. Bernstein) And this letter could very well be evidence of one of those discussions.

MR. FOREMAN: He's answered.

A. I've answered that question --

MR. FOREMAN: It calls for speculation.

A. -- several times. Most of the meetings that were held in those two years had to do with the retirement of the '84 debt. I can't imagine a meeting of my friends that took place in the 24 months between the fall of 1984 and the fall of 1986 that didn't have as debt retirement one of its principal objects.

Q. (By Mr. Bernstein) I realize we have been over this a number of times, but I really feel the need to explain to you the reason I pursue this, and that is frankly the plain meaning, as far as I can tell, the most probable meaning, as far as I can

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tell, of this letter is that the early strategic planning critical to our future efforts refers to a future candidacy, and I was simply asking you if that was so.

A. And I answered twice that it could have been part of an overall agenda that included a lot of things which the FEC has no jurisdiction over.

I do not rule out the possibility that in the course of whatever time we were at that place there was not some discussion, formal or informal, about whether I should run for president or not, and I don't think that was particularly illegal.

Q. But when you wrote these words or when you sent this letter, the early strategic planning you were referring to you think referred in part to future efforts to repay your past debt?

A. Um-hum. The planning that went on at this meeting had to do with debt retirement, had to do with the most effective way I could help the party in campaigning for other candidates, the issues affecting our country -- and this is the third time I

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have gone through this list -- and how we all might better help the Democratic Party and our country in the future. That's what our future efforts are about.

Q. Well, I appreciate you describing that because all I'm trying to do is to understand the import of your words.

(Hart Exhibit 14 was marked for identification.)

MR. BERNSTEIN: Exhibit 14 is another memorandum, this one dated April of 1986, and it is addressed to Gary from Beth.

Was this memo addressed to you?

A. I gather although it could have been some other Gary.

Q. Well, do you think the Beth that the memo is from was Beth Smith as you described as being the press person?

A. Yes, I presume that.

Q. And if it was from Beth, is it likely then that it was written to you and not to another Gary?

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A. I said in all probability it was me although it could have been someone else.

Q. Was there another Gary in your organization that --

A. I'm sure there were hundreds of people that she could have been writing to.

Q. This was in April of '86?

A. Right. There was another Gary Hart although I doubt that she was addressing this to him.

Q. This was April of '86. There weren't hundreds of people --

A. Well, sure, in the Hart organization -- you're missing the point.

MR. SCHNEIDER: Everybody who worked for Senator Hart in '84 considered himself as part of the Hart organization.

A. It's not inconceivable that might be addressed to some other Gary. That's the only point I'm trying to make.

(Hart Exhibit 15 was marked for identification.)

Q. (By Mr. Bernstein) And in May of 1986

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the reference here to prospecting for financial support, you said, was related to debt retirement --

A. I said it probably -- it probably was. Probably was. Because that's what we were doing.

Q. Is it conceivable that it related to financial support for a future candidacy?

MR. FOREMAN: Object to the form of the question. Calls for speculation.

Q. (By Mr. Bernstein) At this time in May of 1986 were you indeed prospecting for financial support for a new candidacy --

A. We were not to my recollection --

Q. -- or a possible future candidacy?

A. We were not raising funds for a 1988 campaign at this time.

Q. But were you prospecting in the sense of seeking out people --

A. I was prospecting and seeking out people who would help me pay off my 1984 campaign debt.

Q. And not for any other purpose?

A. Well, if counsel won't, I'll object to

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the question.

MR. FOREMAN: I think it's been asked and answered. Several times.

MR. BERNSTEIN: Well, it's conceivable --

MR. SCHNEIDER: Well, it's conceivable to you, Mr. Bernstein. You have asked the question.

MR. BERNSTEIN: Let me make my statement and then --

Q. (By Mr. Bernstein) You could very well be prospecting for financial support for people to contribute for both purposes?

A. I could very well be prospecting to raise money for other candidates.

MR. FOREMAN: It's indicated that he was not raising money for a 1988 candidacy at this dinner. I don't know how much more definitive you can be.

Q. (By Mr. Bernstein) You see the difficulty is that what is not going on at this meeting was raising money in the traditional sense. It was

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seeking out people who would provide funds later on?

A. Maybe.

Q. And that's what I was trying to --

A. Maybe. If you have some evidence that's what I was doing at the time, I'll respond to your question, but without that evidence let's just presume I was raising money or seeking to raise money to retire my debt.

If that also led to some help in the future if I ran another campaign, fine.

Q. Do you recall this particular dinner?

A. Generally, yes.

Q. Was there any discussion of a possible 1988 candidacy at that dinner?

A. I don't recollect. I didn't initiate the discussion. I made a talk about the issues facing our country and answered questions.

In the question period someone might have raised that, but I don't recall it specifically. It often came up at the time, but I did not initiate it.

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(Mr. Bernstein and Ms. Jacoby conferred.)

Q. (By Mr. Bernstein) Were plans made to form a campaign committee, a presidential campaign committee in advance of March of 1987?

A. I don't know. There may or may not have been. Lots of plans are formed. Whether they are followed up on, I don't know.

I was not part of those discussions that I recall, but the subject might have been raised. I don't know.

(Hart Exhibit 16 was marked for identification.)

MR. BERNSTEIN: I'm handing you now Exhibit No. 16, which purports to be an agenda for a meeting in Denver in July of 1986.

As you can see, it has a number of subjects that apparently were intended to be discussed at the meeting, and it also reflects that, I guess, at some point in the afternoon of the first day that you arrived and spoke.

If you look on the first page, for

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example, the discussion at 11:15 which includes a panel of people to discuss -- now, I'm reading -- "Fairness Commission rules, changes in 1988 calendar, delegate selection procedures, DNC and automatic delegates" -- does this discussion reflect that at this point these individuals thought --

A. You'll have to ask these individuals. I don't know what they thought. I don't especially recall being at that part of that event. I don't know what they thought.

Is it against the law to think about running for president in '88?

MR. SCHNEIDER: Is there some foundation that indicates that Mr. Hart was the author of this?

A. I notice the item before says, "Debt retirement, fund raising strategy, FEC compliance, and related campaign finance matters."

Was it okay for us to be doing that?

Q. (By Mr. Bernstein) You don't think then that the planning that is indicated by topics of this discussion indicated that at this point you

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would become a candidate?

MR. SCHNEIDER: If the Commission wants to conclude on the basis of this that that decision was made, then so be it, let the Commission conclude it and we'll deal with it, but don't ask Mr. Hart to conclude anything on the basis of a document that he says he hasn't seen.

He doesn't even remember being at the event and he's not the author of it. I mean it's absurd. Any way you read this you conclude whatever you wish and we'll deal with the Commission's conclusion with respect to this.

MR. BERNSTEIN: Well, what I'm trying to get at in a more general way is whether the topics that were discussed here were typical of other, quote, you know, retreats, unquote, that we were talking about earlier.

A. We would have to dig out the agenda for all those retreats. A lot of them we just had fun. We played tennis. We rode horses. We had barbecues.

I do notice on page 2 another panel

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discussed the '86 elections, candidates GH is helping, the volunteer committee.

You see, for better or worse -- and I hope I don't grandize myself -- after the 1984 campaign I had become a national leader in my party.

I was expected to do certain things. I couldn't do those things by myself. I had a staff. I had advice. I had people who helped me. I went out and campaigned very hard in 1986 for other candidates.

As a former candidate and a former senator and a citizen of this country, I think you have one interest and one interest only, and that is when I decided to run for president -- and I have said three times under oath -- that was March of 1987. I will say it once more.

Now, if you wish to provide me evidence or the Commission wishes to conclude that I am lying, then do it right now.

MR. BERNSTEIN: We haven't concluded anything yet.

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A. Then what are you trying to get at? This is an investigation to determine what? That I was lying? That I had, in fact, decided to run for president before I say under oath that I had?

You're going to have to give me a little more evidence of what you're after here if you want my cooperation because your efforts to build a case that I am not today telling the truth and did not, in fact, previously tell the truth are barking up the wrong tree, my friend. And you'd better provide some more evidence or back off because you are not getting anywhere.

Q. Well, in part I guess what you may have gathered already is that at least in part some of these documents seem to indicate --

A. That I was thinking of running for president?

Q. -- formalized structure and posed the question and I asked you these questions to try to understand, you know, what your best understanding was and what your explanation was.

A. And I told you that repeatedly. I've

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told you that repeatedly.

(Hart Exhibit 17 was marked for identification.)

Q. (By Mr. Bernstein) This is Exhibit No. 17, and this is a memorandum in August of '86 from Bill Shore to you and it first reads, "You have trips scheduled to California in August, September and October. The August trip is basically R&R. The September trip will be all fund raising and the October trip will consist almost entirely of campaigning for 1986 candidates."

The October -- I'm sorry -- the September fund raising referred to, what would that fund raising have been for?

A. What have I said it was for? I spent 1985 and 1986 paying off my 1984 campaign debt. Consider that answer generic to all questions as to what fund raising I was doing.

Q. Thank you.

MR. FOREMAN: There's also apparently a part blocked out on the second page of 1986. I take it it's on yours as well.

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MR. BERNSTEIN: Yes.

MR. SCHNEIDER: That's apparently because it was on ours as well so --

Q. (By Mr. Bernstein) Can I ask you, the midway down the first page it describes an agenda for your August trip, a video session with Bill Zimmerman and perhaps Stuart Karl to discuss communications strategy. What would have --

A. I have no idea. Maybe how to do better on television. I don't know. I was never a very good television performer.

Q. Do you remember, sir, meeting with Bill Zimmerman in August?

A. I could have.

Q. Do you know Bill Zimmerman?

A. Sure. He helped us out in '84.

Q. Was he in the media business?

A. My recollecion is that he was.

Q. But you don't remember these discussions particularly?

A. No. If they were held, were they illegal?

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Q. I hand you another exhibit and this is Exhibit No. 18.

(Hart Exhibit 18 was marked for identification.)

Q. (By Mr. Bernstein) And this is a schedule, in October of 1986, and the bulk of these activities appear to be fund raisers for other candidates in the midterm elections.

On the second page at 7:00 p.m. there is an event described as prospecting dinner hosted by Al and Marilyn Gersten.

What did that refer to?

A. The same thing as all the others, how to raise money.

Q. For what purpose?

A. Pay off the '84 campaign debt and keep open all options for the future, but principally to pay off the campaign debt.

Q. Do you remember this campaign -- this trip?

A. Only in the vaguest sense, yes, I remember campaigning for Alan Cranston and my

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namesake, Gary Hart, a couple of others, yes.

Q. Do you remember this prospecting dinner referred to?

A. I remember attending a dinner at the Gerstens' home, and I suppose that was it.

Q. Did the subject of a possible 1988 candidacy arise?

A. It may have. I didn't raise it because I traditionally did not during the 1986 campaign. I did not say -- I did not stand up in front of these people and say I intend to be a candidate for president in 1988 and I want your help. Somebody may have asked me was I going to run.

Q. You don't have a specific recollection?

A. No, I don't. I obviously went to an awful lot of events.

(Hart Exhibit 19 was marked for identification.)

Q. (By Mr. Bernstein) This is Exhibit 19, which is a letter again that was produced by counsel on behalf of one of the two committees.

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MR. BERNSTEIN: I assume this was in the Friends of Gary Hart file.

MR. SCHNEIDER: I don't know.

Q. (By Mr. Bernstein) It's a letter in January of 1987 from John Garamendi to another individual. It refers to a January 28th dinner at the St. Francis Hotel.

Do you recall that event?

A. Yes.

Q. Do you recall meeting with the individual who this letter is written to?

A. I don't. It was a rather large dinner, as I recall.

Q. Well, at that dinner did you speak with people about your presidential campaign?

A. I spoke with the people about the '88 election and the importance to our country and the issues involved. It was a large enough dinner I don't believe there was a question and answer period afterwards. I think Senator Garamendi was rather effusive, if I may so say so, in his introductory remarks about me and hoped that I would be

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a candidate and that others in the room would support me as he did, but that was beginning to happen I think more and more in '87 as we got ready for the campaign.

MR. BERNSTEIN: This obviously was in the period -- so there isn't any misunderstanding -- in January of 1987 clearly was in the period when you were engaging in substantial exploratory activities?

A. Yes.

MR. FOREMAN: For the record we believe that it's after a period of time when the exploratory committee had actually been formed, but I don't think that the Senator is in a position to know that of his own personal knowledge and so he hasn't said it.

(Hart Exhibit 20 was marked for identification.)

Q. (By Mr. Bernstein) This is Exhibit 20. This again came from the Friends of Gary Hart files, and it's entitled, "Denver Finance Meeting" in February of 1987. And I think that most

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of these individuals who were listed as presenting the topics that are indicated on the first page are all people that you mentioned as having been involved in one capacity or another in your campaigns?

A. Yes, I think Mr. Brownstein's name had not risen up to this point.

Q. You're right. Did you attend this meeting?

A. I believe I did -- well, I don't know whether I attended that session. I know I went to dinner at the Brownsteins', and I believe it was that night.

But I don't believe I attended the session. I may very well have.

Q. Well, do you know when the finance committee that's referred to in the title here was formed?

A. No.

MR. FOREMAN: Off the record?

A. Does it say finance committee or does it say finance meeting? I don't see committee.

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Finance meeting, I think.

Q. (By Mr. Bernstein) Well, on the first page under funding methodologies it refers to national finance structure.

A. It's probably -- my guess is we were checking if a campaign got underway, what that should be.

MR. SCHNEIDER: Mr. Bernstein, off the record --

MR. BERNSTEIN: Well, we're --

MR. SCHNEIDER: Let me tell you that --

MR. BERNSTEIN: Wait. We'll go off the record.

(Discussion off the record.)

MR. BERNSTEIN: On the record.

Q. (By Mr. Bernstein) Your best recollection is that at this point in time there was no, quote, national finance structure, unquote, in existence --

A. But, you see, the problem --

Q. -- for the 1988 candidacy?

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A. The problem we are having here is what do you mean by structure? Were there people committed to raise money in a systematic way if I were to become a candidate? Of course.

Did they meet monthly or have minutes or whatever? I doubt it.

So, you know, the structure -- you're dealing here with -- you're using legal terms in a very -- in an atmosphere which is not conducive to those terms. Structure with a small S but perhaps not with a large S. I don't know how to make that distinction.

Q. Do you think that there may have been individuals that were engaging in these activities on your behalf who presumed or assumed that you had already decided to become a candidate?

A. Yes, but not from any direct statement from me.

I also presume that there were people doing the same thing in other parts of the country, Dukakis, Gebhart, and other potential candidates, people who eventually did, in fact, get into the

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race. It's quite normal.

Whether they had exploratory committees at this point, I don't know.

Q. But as far as you can tell, none of these documents suggest that you had made a decision to become a candidate earlier than March of 1987; is that right?

A. Well, that's conclusionary. You have to reach that conclusion.

Q. What I'm trying to do is simply try to summarize what the result has been of our examination of these various materials.

A. The summary would be as follows: People, many of my friends from '84 and friends that I had made within '85 and '86, clearly hoped I would run, may have, in fact, believed that I would run, wanted to help me prepare for it eventually at that time that I would run, but as I have said repeatedly here today, I did not make a final decision to run until March of 1987 in cooperation finally not only with these people that you have seen, but primarily with my family, my wife and my children.

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And, in fact, I think I can give you the names of people you may want to talk to that I had discussions about that late about not running.

Q. Who would they be?

A. Warren Beatty, Kathy Bushin, Bill Dixon, Billy Shore, perhaps two or four others, my wife.

Q. And these were all people who were aware that --

A. People with whom I had discussions about whether I should run or not.

Q. Are you familiar with the volunteer committee?

A. I knew there was such a committee.

Q. Do you know who was involved in it?

A. I cannot tell you off the top of my head. We can find out for you.

Q. Do you know what its relationship was to either your 1984 presidential committee, your 1988 committee?

A. No, my recollection is that it was formed for the purpose of compliance with the law and

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regulations, whatever costs were involved in campaigning for other candidates in '85 and '86, I believe.

That's not a profinitive statement. We had no great love for more committees. When we started, we primarily did it to comply with the law as we understood it at the time and often in consultation with legal experts and people who understood the law.

Q. To your knowledge, did it provide any services to the '84 committee or the '88 committee?

A. In what form?

Q. In any form.

A. Give me an example of a service. I'm not sure --

Q. Did it provide anything of good, of benefit, a good or a service?

A. I have no idea. I don't know.

Q. Were you aware of its daily activities?

A. No.

Q. Do you know who Greg Lebel is?

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A. Yes.

Q. Who is he?

A. A supporter of mine, former campaign staff member.

Q. In 1984 a campaign staff member?

A. Well, staff gets to be always a term of art. It usually means salary or compensated, and he was working in New Hampshire and theoretically was compensated.

Whether he was actually compensated, I don't know because a lot of people were not being at that time.

Q. Do you know if he was involved with the volunteer committee?

A. May have been.

Q. Do you know of anybody else who was by name?

A. Not off the top of my head.

Q. Were you acquainted with Dennis Walta?

A. Yes.

Q. When did you first meet him?

A. I don't know. My guess is '82 or '83,

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perhaps later, perhaps later, perhaps '84.

Q. How were you introduced to him?

A. I have no idea, probably on the campaign trail some place.

Q. Did you first get to know him on the campaign?

A. Yes, '84.

Q. Did he have some sort of capacity in in the 1984 campaign?

A. Presumably.

Q. Do you know what it was?

A. No, no. I can guess.

Q. What's your guess?

A. My guess is either advance work or political organization or both.

Q. Did you interact with him often during the 1984 campaign?

A. Define interact. Did I see him?

Q. Try to answer the question the best you can and if you have to qualify it --

A. I don't know what interact means. I interacted with thousands of people. It depends

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on what you mean. I don't know what you mean by interact. I can't answer the question if I don't know what it means.

Q. Answer as best you can.

A. No, I'm not going to because I can't say. I can't answer a question I don't understand. I don't understand your question. Therefore I'm not going to answer it.

Q. Did you see him?

A. Oh, I'm sure I did. I don't know where --

Q. How frequently?

A. I have no idea.

I could have seen him often. I could possibly have not seen him very often. It depends on where he was working.

I saw an awful lot of people.

Q. Was he a friend of yours?

A. I hope so. I hope a lot of other people are too.

Q. Is he a close friend of yours?

A. What do you mean by close?

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Q. Answer as best you can.

A. No, I'm not going to because I don't understand the question. What does close mean? And what does was mean? What does that time period mean?

Q. During 1984.

A. No, he was not a close friend. He was a student volunteer or possibly salaried or compensated, I don't know, but about along with -- I would put him in a category of perhaps not dozens but hundreds so I couldn't say he was a close friend.

Q. Did your relationship with him develop after the 1984 campaign?

A. Our relationship? I got to know him better, somewhat better, but that's also true of several dozens if not hundreds of other people.

Q. Did he have a capacity with the 1988 campaign?

A. Well, I take that question to mean was he a staff -- had he become a staff member.

Q. Was he either a staff member or paid money for services?

A. I don't know.

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Q. Did you come into contact with him frequently during the 1988 campaign?

A. Well, campaign A or campaign B?

Q. Campaign A.

A. Well, that just lasted about 30 to 45 days so I would say probably not.

Q. Well, I'm referring to during the exploratory phase as well.

A. I would say not frequently. Occasionally maybe.

Q. What did he do for the campaign at that point?

A. My guess and recollection and partial recollection is that he was doing advance work as, say, going out and organizing trips or events, but so were quite a few other people.

Q. Did Mr. Walto do advance work for you during 1985 and 1986?

A. My recollection is occasionally; not often, but occasionally.

Q. For all of the various activities that you were involved in at that time?

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A. No. For some, not all.

Q. But for the range of activities, I guess is what my question was?

A. For the range of activities? Well, no.

Q. You traveled for many different purposes in that period?

A. Right, right, and on occasions he would advance a trip.

Q. During that period was he paid by AWH?

A. I have no idea. I think the pattern was if I was to go out and do an event to retire the '84 debt and there were funds available, we tried to compensate the people who advanced those events, but Dennis would have been only one of several at least to have done that, and I hope we compensated him some way.

I don't believe we had enough money or cash though at the time to keep full-time advance people on, but I could be wrong. I wouldn't think so.

Q. Were you aware that he had employment

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at that point, apart from the advance work that he was doing?

A. I'd have to go back and refresh my recollection or I mean I'd have to be reminded of my state of mind at the time. To be quite honest, I probably didn't think much about it.

MR. SCHNEIDER: Mr. Bernstein, are you talking now about all of 1985 and all of 1986? That time you've used now in the four or five sentences away from when you defined what that time was.

MR. BERNSTEIN: Essentially what I'm referring to is the time after 1984 and before -- how shall we say -- the most active exploratory activities.

A. The election of '84 and the election of '86? I assumed he was employed. If he wasn't on some one of the committee payrolls -- I assumed he was, and we may or may not have had a discussion to that effect, but I don't recall the specific discussion.

Q. (By Mr. Bernstein) Do you remember him mentioning his employer to you?

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A. No, I don't, but it doesn't mean he didn't. I don't remember a specific instance where he did.

Q. Did anyone tell you who his employer was?

A. May have. Not that I recall, but they may have.

Q. Did you ever discuss his ability to perform advance work for you and yet also be working elsewhere?

A. Not that I recall. It doesn't mean that on occasion I wouldn't say this isn't interfering with the rest of your life, Dennis, or anything, but I do not, not peculiar to him, but for everybody. I try to be grateful for people who make an extraordinary effort in connection, but in Dennis' case not more than others.

Q. Did you understand that at that point that corporations couldn't -- can't pay the salary of employees to work on campaigns?

A. I'm sure I did.

I had occasion to wonder in a number

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of campaigns how people who were on corporate salaries were being compensated by those campaigns but I never pursued it.

Q. Well, did you question that in the case of Dennis Walto?

A. No, I had no reason to.

Q. Could you explain that?

A. No, I can't explain it. I had no reason to question it. I didn't know whether he was on a corporate payroll or not, and even if he were, that's still not an absolute prohibition to doing occasional advance work, I don't think, is it?

Q. But I thought you were saying as far as he could have been paid by AWH; is that right?

A. Could have, but we're talking about a 24-month period of time and you'd have to be specific about which of those periods you're talking about.

MR. FOREMAN: And I'm going to object generally because I think the point has been made that he is unsure and unknowing as to exactly what Mr. Walto's employment status was so it seems to me

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that the questions that infer a corporate employer are essentially unfair because the question has been asked and answered.

MR. BERNSTEIN: Well, I'm sure that you can understand that where there are events that took place sometime ago we make every attempt we can to try, by asking questions different ways, to refresh recollections of the witnesses, and that's all I can try to do.

MR. FOREMAN: If you are trying to refresh his recollection, the usual technique is to impart information in the question so that the next answer is based on more information than the last answer rather than --

MR. BERNSTEIN: Then I'll seek to do it more artfully. Thank you.

Q. (By Mr. Bernstein) I'm sorry. What were you going to say?

(No response.)

(Hart Exhibit 21 was marked for identification.)

Q. (By Mr. Bernstein) What I would like

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to do is show you at this time Exhibit No. 21, which is a memo from Walto, apparently Dennis Walto, in February of 1987 and it's addressed to Sue, Greg, Shore and Emmo.

Would it be reasonable to infer that that refers to Sue Casey?

A. The answer is I don't know.

Q. Bill Shore?

A. You can reach whatever conclusion you wish. I'm not going to jump to any.

Q. Are you familiar with John Emerson using an abbreviation for his name or a shorthand Emmo?

A. Yes, yes.

MR. FOREMAN: Off the record. I'm going to slip out and go to the bathroom while you proceed, but I don't want you to wait for me while I go.

(Mr. Foreman left the deposition room.)

Q. (By Mr. Bernstein) I realize this is a tough one because this is obviously not a memo that you saw and yet I wonder if you can offer any

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explanation of what the reference might be when Mr. Walto is indicating that his expenses and travel in February of '87 presented no burden to the campaign.

A. I can't say.

Q. Okay.

A. My understanding is, however, that people are free to contribute their time and energy to a campaign if they choose to. As many do.

Q. But at that point in time you were not aware enough or thinking enough about how much time Walto was spending doing advance work for you?

A. Of course not; of course not; of course not.

Q. So you would not have been in a position to really make a judgment about whether his advance work was incompatible with other duties?

A. No, no, as I would not have been with anybody for that matter. If somebody wants to work five days a week or three days a week and contribute their time -- the rest of their time to campaign, my understanding is they are free to do so.

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Q. Was Dennis Walto involved as well in your campaign B, as you put it?

A. I think he did some -- a couple of trips, advanced a few trips. I couldn't tell you how many.

Q. Did you spend a lot of time with him in campaign B?

A. I didn't spent a lot of time with anybody. It was quit hectic. I spent a lot of time with my daughter because she traveled with me and my wife, but other than that, I wouldn't say a lot of time.

Advance people by definition are out in front and consequently you don't get a chance to spend a lot of time with any of them.

Q. Are you familiar with Stratton & Associates?

A. Yes.

Q. Is that affiliated with Mike Stratton that you described earlier?

A. Yes, I believe it is.

Q. Do you know what services if any

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Stratton & Associates provided to your 1988 campaign?

A. No, I do not. I believe Mike Stratton as an individual did some advance and organizational work, but that's all I know.

Q. Did he and Dennis Walto work together?

A. May have. I don't know.

Q. Did Walto have any relationship with Stratton & Associates?

A. You'd have to ask Walto. I don't know.

Q. During the 1984 campaign do you recall the production of a videotape or a cassette being contemplated?

A. Not by me.

(Mr. Foreman returned to the deposition room.)

A. It may have been contemplated by other people.

MR. SCHNEIDER: Excuse me. During which campaign?

MR. BERNSTEIN: 1984.

MR. SCHNEIDER: During the 1984

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campaign.

A. It may have been contemplated by someone, but that question is asked in a passive voice so I can't really answer it. I did not contemplate it.

Q. (By Mr. Bernstein) Were you involved in discussions during the 1984 campaign about the production of a videotape or a cassette?

A. Not to my recollection.

Q. Do you recall that subject being discussed at any point in your 1988 campaign?

A. There was discussion about that new technique as a potential fund raising and communication method, but I can't give you specific dates and times or people.

Q. Well, whose job would it have been in the '88 campaign to discuss such things or to formulate plans for such things?

A. It would probably have been a committee decision with a small C. By that I mean a group decision involving Mr. Dixon and others.

I don't think any single individual

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would have had the authority or the responsibility to do so, but there could very well have been a group of people in the campaign talking about that possibility.

Q. Presumably you had been filmed for advertisements in both campaigns. Do you recall any filming for the purpose of a video or a cassette?

A. Well, there was some filming done at our property involving my wife and myself, but I was never specifically clear as to all the uses to which that might be put, whether in putting together a longer film or pieces or whatever -- I think it was done in contemplation of a variety of uses, but again you'd have to ask other people.

Q. When was that?

A. I don't recall. I can go back and look at the records.

Q. Approximately when?

A. Late '86? My guess is. Pure guess.

Q. Could this have been part of an exploratory activity?

A. It could also have been part of debt

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retirement, since we were still talking about how to raise money to retire the debt.

Q. And do you view it as a potential fund raising device?

A. I don't know what I viewed it as. I essentially said -- I was told, "We want to shoot the film and this is when it will be done. It can be used for a longer piece. It can be be used for shorter pieces. It could be used for fund raisers or whatever."

Q. Do you know if any such videotape or cassette was ever produced?

A. I don't believe it was, but I'm not sure. My recollection is that we never got that far and never got enough literature or whatever.

Q. Did you ever review a script for such a cassette or video?

A. I could very well have. I obviously had to be told at some point what generally it was that I was to say, but I don't recollect that I memorized a script as such.

I think it was more talk about your

background or talk about your concerns, about the issues, something like that, but the technical use of the term "script" does not strike a resonant note.

That is to say I don't recall being given a set of words to say and I would probably have rebelled against it because that's not my style.

Q. Well, who was involved in the production of this videotape, at least the activities you were aware of?

A. Well, I assume that the leadership of the campaign was involved with it. I believe that the day-to-day responsibility fell to Beth Smith. But there may have been others as well.

Q. Were their entities outside the campaign that were involved?

A. I don't know. I assume some since the campaign does not have cameras and film and processing equipment so one has to assume that.

Q. But no particular entities or firms come to mind?

A. Not that I have -- no specific names.

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I think Mr. Karl had some advisory role in this as well, but I don't know that. I don't recall.

Q. Did you have discussions with him about a videotape?

A. Probably, but that could have been going on over a period of time because that was his business. I'm sure there were times when I said, "Stuart, do you think one can use video technology these days to campaign for office?" something like that.

Q. Well, do you think that was in the 1984 campaign or --

A. My guess, it's later.

Q. You don't recall it arising during the 1984 campaign?

A. May have. May have. But no specific --

Q. You have a better recollection of later?

A. As time moved on, yes.

Q. Are you familiar with an entity called LA Film Works?

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A. No.

Q. How about Visual Eyes?

A. No.

Q. Do you know if Douglas Rosen had involvement with Visual Eyes?

A. I think he was involved with this proposal as well, but what capacity I'm not clear, and what his responsibilities were I'm not clear.

Q. Who was paying for the development of this?

A. I don't know.

Q. Are you familiar with a company called Complete Products?

A. No.

Q. How about Cooper Hamilton Corp.?

A. I don't believe so.

Q. How about Ray Struthers Associates?

A. Yes, I know Mr. Struthers.

Q. And how do you know him?

A. He did political consulting and commercial production for the campaign in '84.

Q. Do you know of any business

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involvement that Ray Struthers' firm had with Stuart Karl's firm during 1984?

A. No, no, I do not.

Q. Do you know if there was --

A. No, I do not; no, I do not.

Q. -- any involvement?

MR. BERNSTEIN: Off the record for just a minute.

(Discussion off the record.)

MR. BERNSTEIN: At this point we are prepared to conclude the deposition and if counsel have any questions they would like to pose to the witness, you may at this time.

MR. FOREMAN: I have no questions. How about you, Mr. Schneider?

MR. SCHNEIDER: No, I have no questions.

MR. BERNSTEIN: In that case, Senator Hart, do you understand that you will have the opportunity to review and to sign this deposition?

THE WITNESS: Yes, I do.

MR. BERNSTEIN: In that case we will

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go off the record.

(Deposition concluded at 2:10 p.m.)

* * * * *

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8.

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CERTIFICATE OF WITNESS

STATE OF COLORADO)
) ss.
COUNTY OF _____)

I, GARY HART, the witness in the above deposition, do hereby acknowledge that I have read the foregoing transcript of my testimony and I state under oath that it, together with any attached Amendment to the Deposition, constitutes my sworn testimony.

I ( ) have ( ) have not made corrections on the attached Amendment to Deposition form.

_____
GARY HART

SUBSCRIBED AND SWORN TO before me this _____ day of _____, 1988.

My Commission expires _____

_____
NOTARY PUBLIC
Street_____
City/State _____

9304353 8844

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REPORTER'S CERTIFICATE

STATE OF COLORADO)
) ss.
CITY AND COUNTY OF DENVER)

I, VIOLA J. LUNDBERG, Registered Professional Reporter, Certified Shorthand Reporter, and Notary Public for the State of Colorado, duly commissioned to administer oaths, do hereby certify that, previous to the commencement of the examination, the witness was duly sworn to testify to the truth in relation to the matters in controversy between the said parties; that the said deposition was taken in stenotypy by me at the time and place aforesaid and was thereafter reduced to typewritten form by computer-aided transcription (CAT); that the foregoing is a true and correct transcript of my notes thereof;

That I am not attorney nor counsel, nor in any way connected with any attorney or counsel interested in the outcome of this action.

IN WITNESS WHEREOF, I have affixed my signature and seal this 6th day of August, 1988.

My commission expires May 9, 1991.

Viola J. Lundberg, Notary Public
227 South Lamb Lane
Golden, Colorado 80401

SCHEDULE FOR SENATOR GARY HART
Friday, March 22, 1985

7:15 am	DEPART Ritz Carlton for LaGuardia
8:00 am	DEPART La-Guardia-Eastern Shuttle for Washington
9:00 am	ARRIVE Washington-National airport
10:15 am	PHONE CALL to Helen DeWar
10:30 am	MEETING with Senator Cohen 237 SR
11:30 am	MEETING with Beverly Ellerman 237 SR
	+ Staff: Bill Shore
12:30 pm	MEETING with Stuart Karl Senators' Dining Room
	+ Staff: Bill Dixon and Mike Novelli
RON	DC

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EXHIBIT
7-15-85

00135

SCHEDULE FOR SENATOR GARY HART
Friday, May 3rd, 1985

9:30 am — COFFEE with Neil McNeil, TIME
Senators' Dining Room

4:15 pm — DEPART for National Airport

5:00 pm — DEPART for Lexington

+ Piedmont FL #303
+ Arrive Charleston, WV at 5:54 pm
+ connection to Piedmont FL #722, departing Charleston at 6:30 pm.

7:05 pm — ARRIVE Lexington

+ met by Ruth McElwaine, Bill Shore

HOLD - Change clothes and depart for Coach House Restaurant

8:00 pm — ARRIVE Coach House Restaurant
855 South Broadway
Lexington, KY
(606) 252-7777

+ dinner with the Derby weekend guests:
Stuart & Debby Karl
Jim & Gloria Barrett
Malcolm & Vivienne Lassman
Barry & Karen Brief
Fred Levin
F.A. "Dean" Baird
Regis McKenna
David Stein & guest
Danny & Sharon Ponce
Anthony Liuzzo & guest
+ black tie

9:30 pm — DEPART Coach House for Anita Madden's party

EXHIBIT 2

2304350838447

SCHEDULE FOR SENATOR GARY HART
Monday, October 7, 1985

7:00 am	DEPART hotel for airport
	+ Driven by: Mike Abrams
8:00 am	DEPART Miami airport on Eastern 158 for Washington
10:13 am	ARRIVE Washington-National
12:30 pm	LUNCH with Stuart Karl Senators' Dining Room
RON	DC

9304335038848

DA: 6/26/86
Re: Karl Home Video

EMORANDUM FROM

COTT VAN HOVE

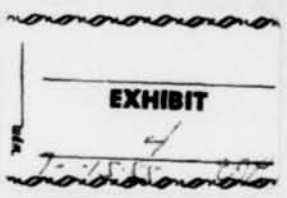
Patti -

Pdlase add 2 more charges to this bill:

Air Transportation 360.—
" " 150.—

Thanks
Scott

9304335 38449



6/9/86

Dear Richard,

Hope this is ok.
Let me know if I can
do anything else.

Warm Regards,

Lana

00026

G. STUART KARL, JR.

June 6, 1986

TO: Americans With Hart

INVOICE: 001

RE: 6/22/85 Air Transportation

COST: $360.

ITINERARY: San Francisco-Fresno-San Francisco

00027

G. STUART KARL, JR.

June 6, 1986

TO: Americans With Hart

INVOICE: 002

RE: 10/18/85 Air Transportation

COST: $150.

ITINERARY: San Francisco-LosAngeles

00028

SK

To Scott

CONFIDENTIAL

TO: Mike
FROM: Richard
DATE: April 24, 1986
RE: Planes and choppers in 1985

DATE	DESTINATION	PURPOSE	COST
4/26/85	LAX-OC	RETREAT	1,190.-
4/28/85	OC-LAX	RETREAT	714.-
6/22/85	SF-FRESNO-SF $360 1st class w/ help	AWH	5,751.-
10/18/85	SF-LAX $285 1 way	AWH	4,487.-
12/5/85	LAX-OC	PAC RIM	2,238.-
12/8/85	OC-LAX	PAC RIM	2,880.-
TOTAL			17,260.-

1914 - 962 - Lee & Gary
481 - Dunn
481 - Shore

All S. Karl

5/8/85 GH attended AWH fundrs. Consequently, based on advice from [redacted] S.V.H. this is not a gift from anyone, but should be billed to AWH by a S.K. entity, & shown as an acct. payble by AWH. Scott - Please follow with S.K. staff to get bill & complete transaction. Bill should be $360 (6/22/85); $[redacted] (10/18/85) - $150

9304355853

00029

MAR 15 1996 178

Date: 3-14-86 ACFT: 4-1

PIC: SIC:

Sched. By: MIKE SEVERY Date: 3-7-86

FLIGHT LOG

MA Nº 8170

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 852-8300

03

AUTHORIZED BY: RAMA CUSTOMER: STUART KARL

ADDRESS: ON-FILE

QUOTE: PHONE:(W) 714-474-0355

AE BA MC CASH CHECK **CREDIT** PAID (H)

ITINERARY: SNA TO SMO @ 1500 SMO TO SNA @ 1600 TO

TO TO TO

PAX: # SENATOR GARY HART + 4

LEG NO.	1	2	3	4	5	6
TOW						
MGTOW						
C.G. LOCATION						
C.G. LIMITS						

1.0	FLT. HOURS @ 595	= 595.00
1.0	WAIT HOURS @ 50	= 50.00
	MAX. WAITS @	=
	RON'S @	=
	MISC @	=
	SUBTOTAL	=
	FED. TAX 5% 8%	=
	FLIGHT TOTAL	= 645.00

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED
1	3	3/14	SNA	1854.5	1855.5	1500	1700	1.0	+	
2									+	
3									+	
4									+	
5									+	
6									+	
						TRIP TOTALS		1.0	+	

ROUTE	ALT	ETE	FOB
EXHIBIT 5			

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.	1855					
TRIP TIME	1.0					
TOTAL TIME	[illegible]					4

AIRCRAFT CHECKED AND FOUND AIRWORTHY, PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Sig[illegible])

NOTES: P/U AT (SMO)

SENATOR GARY HART

MartinAviation
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: K1204
STUART KARL
ATTN: RANA WITTE
17942 COWAN
IRVINE, CA. 92714

INVOICE NO. 02166
INVOICE DATE 3/14/86

FLIGHT DATES: 3/14/86 to 3/14/86
ITINERARY : SNA SAD SNA

INVOICE NO. 02166

AIRCRAFT : 444CB

FLIGHT LOG NUMBER. 8170

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	1.0	395.00	395.00	
Wait Hours	1.0	50.00	50.00	
Max Wait				
Runs				
		Total Flight Charge ..		445.00
		Total Misc. Charges ..		
		Sub-Total		445.00
		Transportation Tax ...		
		Flight Total		445.00

Comments
OUTB. BY: RANA
PICK UP SENATOR GARY HART

*** TERMS: NET 15 ***

THANK YOU FOR FLYING WITH MARTIN AVIATION, INC. TELEPHONE: (714) 852-8300

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: [illegible]
STUART KARL
ATTN: [illegible]
17242 CHAN
IRVINE, CA. 92714

INVOICE NO. .....
INVOICE DATE .....

FLIGHT DATES: [illegible] to [illegible]
ITINERARY : SNA LAX SNA

INVOICE NO. .....

AIRCRAFT : [illegible]
PILOT IN COMMAND.... DOUG [illegible]

FLIGHT LOG NUMBER.. [illegible]

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	1.0	650.00	650.00	
Wait Hours				
Max Wait				
Rons				
		Total Flight Charge ..		[illegible]
		Total Misc. Charges ..		
		Sub-Total		[illegible]
		Transportation Tax ...		
		Flight Total		650.00

Comments
SK003

Bert Smith
McKay Daines
SentHart

*** TERMS: NET 15 ***

EXHIBIT

X

SK-003

EXCUTIVE JET - TRIP REQUEST

DATE TRIP REQUESTED: 9-15-86

DATES OF TRIP FROM: 9-15-86 TO: 9-15-86

TRIP ITINERARY: SNA -LAX- SNA

TIME OF DEPARTURE: 1200

NAMES OF PASSENGERS:

1. Beth Smith 2.
3. McKay DAINES 4.
5. 6.
7. 8.

TYPE OF AIRCRAFT REQUESTED: L-1 Helicoptee 444CR

TYPE CATERING REQUESTED: (IF OTHER THAN STANDARD) NONE Required

REASON FOR TRIP: STUARTs Requested FOR Beth & McKay

AUTHORIZED BY: Stuart Rank M/S

930435 38557

Mon 2304358 3858

224 Green

Date: 9/15 ACFT: 44LA

PIC: Ken Simpkins SIC:

Sched. By: Date: 9/15

FLIGHT LOG

MA Nº 1062

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 852-8300

03

AUTHORIZED BY: CUSTOMER: Silvercloud

ADDRESS:

QUOTE: PHONE: (W) 474-0355

(H)

AE BA MC CASH CHECK **CREDIT** **PAID**

ITINERARY: SNA to LAX ○ 1700 LAX to SNA ○ TO ○

TO ○ TO ○ TO ○

PAX:

LEG NO.	1	2	3	4	5	6
TOW						
MATOW						
C.G. LOCATION						
C.G. LIMITS						

1.0	FLT. HOURS @	650.00	= 650.00
(.9)	WAIT HOURS @		=
	MAX. WAITS @		=
	RON'S @		=
	MISC @		=
	SUBTOTAL		= 650.00
P.O. #81424	FED. TAX 5% 8%		=
	FLIGHT TOTAL		= 650.00

LEG NO.	PAX	DATE	AIRPORT	HOBBS		BLOCK		TOTAL TIME		FUEL USED	ROUTE	ALT	ETE	FOB
			SNA	TAKEOFF	LANDING	OUT	IN	HOBBS	BLOCK					
1	3	9/15	LAX	2016.6	2017.5	1730	1530	0.9	+					
2									+					
3									+					
4									+					
5									+					
6									+		Bill to			
						TRIP TOTALS		0.9	+					

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LOGS
TIME FWD.	2020.6					
TRIP TIME	0.9					
TOTAL TIME						

AIRCRAFT CHECKED AND FOUND AIRWORTHY; PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature)

NOTES: SK 003

MartinAviation Inc.
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: K1294
STUART Pearl
ATTN: MARK MITCH
17242 COWAN
IRVINE, CA. 92714

INVOICE NO. 04836
INVOICE DATE 9/15/86

FLIGHT DATES: 9/15/86 to 9/15/86
ITINERARY : SNA LAX SNA

INVOICE NO. 04836

AIRCRAFT : 1AACR
PILOT IN COMMAND.... DOUG DAIGLE

FLIGHT LOG NUMBER.. 1062

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	1.0	650.00	650.00	
Wait Hours				
Max Wait				
Rons				
			Total Flight Charge ..	650.00
			Total Misc. Charges ..	
			Sub-Total	650.00
			Transportation Tax ...	
			Flight Total	650.00

*** TERMS: NET 15 ***

THANK YOU FOR FLYING WITH MARTIN AVIATION, INC. TELEPHONE: (714) 852-8300

****Confidential****
FOR STAFF USE ONLY

1/12

SCHEDULE FOR SENATOR GARY HART

FLORIDA TRIP
Monday March 23

3:15 pm	DEPART for Gainesville Delta 427
	+Boston Airport - 617/561-2657 +Delta - 617/561-2540 +Crown Room - next to gate 26
5:48 pm	ARRIVE Atlanta Airport
6:50 pm	DEPART Atlanta Airport Delta 2346
	+Atlanta airport - 404/765-2600 +Delta Airlines -404/530-7250 +Crown Room -adjacent to gate A-17
6:50-8:15 pm	EN ROUTE to Gainesville
8:15 pm	ARRIVE Gainesville Airport
	+Met by Dennis Walto 904/371-3333 +Gainesville Airport - 904/373-0249
8:30 pm	DEPART Gainesville Airport
8:30-8:50 pm	EN ROUTE to Hotel
8:50 pm	ARRIVE Hotel
RON	University Center Hotel Suite 1006 1535 S.W. Archer Rd. Gainesville, Florida 904-371-3333

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EXHIBIT 7

00074

3-4:00 pm	ADDRESS local leaders Jacarina Room 512/686-2471 x522 + 40-60 people + Introduced by County Judge Edgar Ruiz + 15 min. address; 20 min. Q & A + Judge Ruiz will escort for intros
4:00-4:10 pm	EN ROUTE airport driver: Dennis Walo
4:15-5:30 pm	EN ROUTE Austin + pilot: Steve Basco 318/255-9166 tail # 999DT
5:30-5:45 pm	EN ROUTE hotel driver: Dave Bolduc 512/477-1187 o
5:45-7:00 pm	DOWNTIME hotel room Steven F. Austin Hotel 701 Congress Ave., Austin 512/476-1061
7-7:30 pm	COCKTAILS with Mack Wallace + walk to Austin Hotel bar, met by Wallace and Rick Reiter
RON	AUSTIN Steven F. Austin Hotel 701 Congress Ave., Austin 512/476-1061

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2/12

Tuesday March 24

7:50 am	DEPART Hotel
7:50-8:00 am	EN ROUTE to law school Driven by Dennis Walto 904/371-3333
8-9 am	CLASS Constitutional Law Holland Hall Rm.190C +Prof. Fletcher N. Baldwin, Jr. +Gramm-Rudman +904/392-0421 +100 students +CLOSED TO PRESS
9:00 am	DEPART law school
9:00-9:10 am	EN ROUTE to Hotel
ALL DAY	PHONE CALLS/ Class preparation University Center Hotel 1535 S.W. Archer Rd. Suite 1006 904/371-3333
2:50 pm	DEPART Hotel
3-4pm	CLASS Jurisprudence Holland Hall Rm.292 +Prof. Stuart Cohn +Gramm Rudman +904/392-9238 +100 students +CLOSED TO PRESS
4:15 pm	DEPART Law school +Driven by Dennis Walto 904/371-3333
4:15-4:45 pm	EN ROUTE to airport
4:45 pm	ARRIVE Sunny South Field at Gainsville Airport - 904/377-7551
5:00 pm	DEPART for Orlando by private plane

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3/12

TUESDAY MARCH 24 CONT.

5:00-5:40 pm	EN ROUTE to Orlando King Air # N90CC +GWH, WHS plus 4 passengers +Pilot - Bill Rossley - 904/372-5482 +Co-pilot-Wiley Sanders-904/375-4513 Hanger phone 904/377-7551 +Gainesville flt. service 904/376-7515 +Orlando flt. service 305/894-0861.
5:40 pm	ARRIVE Orlando Airport Met by Larry Gentry +Page Avjet field - 305/851-6680 +Orlando flt service 305/894- 0861 +Also by Ronnie Fitzwater for passengers-305/628-2324
5:50-6:00 pm	EN ROUTE to Orlando Airport Marriott
6:00 pm	ARRIVE Orlando Airport Marriott Florida Medical Association
6:00-6:20 pm	Meet and greet - Dr. Gerald Schiebler and Jon Mills will introduce +The Vista Center +7499 Augusta - National Drive Vista C-D Room, Main Floor +305/851-9000 +Event Mgr. Linn Reid (pager 03) +Telex 810-850-0267 +FMA Contact Bill Landis 904/224-6496
6:20-6:30 pm	INTRODUCTIONS - Dr. Gerald Schiebler will introduce Jon Mills at podium then he will introduce GWH
6:30 pm	REMARKS
7:00 pm	DEPART for Airport
7:00-7:10 pm	EN ROUTE to Airport Driven by Larry Gentry 904/358-8881
7:10 pm	ARRIVE Orlando Airport Page Avjet

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4/12.

TUESDAY MARCH 24 CONT

7:20 pm	DEPART Orlando Airport King Air # N90CC +Pilot Bill Rossley 904/372-5482 +Co-pilot Wiley Sanders 904/375-4513
7:20-7:50 pm	EN ROUTE to Gainesville
7:50 pm	ARRIVE Gainesville + Met by D.Walto
8:00-8:25 pm	EN ROUTE to Hotel
8:25 pm	ARRIVE Hotel
RON	UNIVERSITY Center Hotel 1535 S.W. Archer Rd. Suite 1006 904/371-3333

9304335 3864

SCHEDULE FOR SENATOR GARY HART

CONFIDENTIAL
FOR STAFF USE ONLY

Wednesday March 25

10:30 am	DEPART for Jacksonville D.Walto driving
10:30-12:00 pm	EN ROUTE to Jacksonville
12:00 pm	HOLD for Meeting with Steve Pajcic
12:15PM	ARRIVE Prospecting lunch Independent Life Bldg. 1 Independent Drive (at Bay St) River Club (904) 354-1111 Ribault Room, 35th floor Ext 15 Fred Shultz (host) 904/354-3603 + Schultz will meet at 35th fl. elevator
1:15 pm	DEPART for Gainsville
1:15-2:45 pm	EN ROUTE
3-4:00 pm	CLASS Jurisprudence Holland Hall 283 +Old court room +Prof. Winston P.Nagan +Topic: Gramm - Rudman + 100 students + OPEN TO PRESS
4:00-4:10 pm	PRESS Availability Outside classroom
4:10-5:00 pm	DOWNTIME/DINNER
5:00-5:30 pm	HOLD For meeting with Marvin Rosen
5:30-7:00 pm	COCKTAILS John Mills Campaign organizational meeting +1215 N.W.23rd Terrace +(904)- 378-4154
7:00-7:20 pm	EN ROUTE to hotel Driven by Dennis Walto

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Wednesday Cont.

RON

University Center Hotel
1535 S.W. Archer Road
Suite 1006
904/371-3333

in N.H. — 3pm — Lee

Cathy Bonds

NM State
SAT. the 25

Judy
Lebel
Karen
Alan

27-28
DNC

Hal Haddon
Emo
Dx
Tull

00080

9304335038666

SCHEDULE FOR SENATOR GARY HART
WEEKS OF MAY 27 AND JUNE 1

MONDAY, MAY 27

7:20 pm	DEPART National airport
8:35 pm	ARRIVE BOSTON

TUESDAY, MAY 28

8:00 am	PROSPECTING BREAKFAST-Boston
10:00 am	INTERVIEW-GOOD DAY WCVB-TV
12:00 noon	PETER MEADE SHOW WBZ (radio)
2:00 pm	INTERVIEW-Boston Globe
4:20 pm	DEPART for Chicago on AA 581
5:48 pm	ARRIVE CHICAGO-O'Hare
6:30-7:00 pm	PETERSEN FUNDRAISER
7:00 pm	KLUTZNICK DINNER
RON	RITZ CARLTON

WEDNESDAY, MAY 29

8:00 am	POLITICAL BREAKFAST-Chicago (6 people)
9:00-10:00 am	WIND AM Radio
10:15-11:15 am	INTERVIEW-Chicago Sun Times
11:30-12:00 noon	KUP'S SHOW
lunch	PROSPECTING LUNCH-Chicago
4:20 pm	DEPART Midway
5:20 pm	ARRIVE Wabash
5:30-6:00 pm	WABASH reception
6:34-7:30 pm	DEMOCRATIC DINNER-Wabash
7:45 pm	DEPART Wabash for Chicago
8:45 pm	ARRIVE Chicago-O'Hare
9:35 pm	DEPART Chicago-O'Hare on AA 231
11:55 pm	ARRIVE Houston
RON	HOUSTON-Warwick Hotel

THURSDAY, MAY 30

noon	Houston-Live (TV)
1:00 pm	PROSPECTING LUNCH
2:30-3:15 pm	INTERVIEW-Houston Chronicle
3:15-4:00 pm	HOLD/One on Ones
	FUNDRAISING
4:30 pm	DEPART Houston (Hobby)
6:00 pm	ARRIVE Los Angeles
6:30 pm	DEPART Los Angeles
7:41 pm	ARRIVE San Francisco
RON	STANFORD COURT HOTEL

FRIDAY, MAY 31

10:00-11:00 am	People are Talking (TV)
12:30-1:30 pm	HOLD/PROSPECTING LUNCH

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3:00-4:00 pm	INTERVIEW/Jim Eason Show
6:15-7:15 pm	FUNDRAISER hosted by Nancy Pelosi
8:00 pm	DEPART San Francisco on Stuart Karl's plane
9:00 pm	ARRIVE LA
RON	WB

SATURDAY, JUNE 1

RON	WB

SUNDAY, JUNE 2

RON	WB

MONDAY, JUNE 3

8:45 am	DEPART LA on AA 76
4:33 pm	ARRIVE DULLES
evening	DINNER-Nate Landau's
RON	DC

TUESDAY, JUNE 4

11:15-12:00 noon	ADDRESS Cong Vicosky' seminar
12:15 pm	MEETING with Larry Chimerine
12:30 pm	DEMOCRATIC CAUCUS LUNCH
2:00 pm	TAPING of "An AMerican Portrait"
7:30 pm	WCF dinner at Liz and George Stevens
RON	DC

WEDNESDAY, JUNE 5

2:00 pm	MEETING with Bill Dodds
3:15 pm	INTERVIEW with TV Guide (with Bill Cohen)
RON	DC

THURSDAY, JUNE 6

8:00 am	INTERVIEW with Sue Casey
2:00 pm	MEETING with Mr. Fred Chen (per Senator McGovern)
5:30 pm	PARTY for Tom Lynch

FRIDAY, JUNE 7

am	DEPART for Denver
noon	HOLD/MEETING with Rocky Mt News Ed Board
pm	HOLD/MEETINGS
RON	DC

9304335 38668

SCHEDULE FOR SENATOR GARY HART
Monday, November 10
Orlando, Florida

6:30 am — DEPART Grand Bay Hotel

+ Staff: Bill Shore
+ Driven by: Mike Abrams?
(305) 522-2300
(305) 931-0058

7:00 am — ARRIVE Miami Int'l Airport
Page Aviation
(305) 526-6344

7:15 am — DEPART for Orlando
Lorimar Jet
(G2-11 seater)

Tail #: 14LT
Pilot: Jack Zahniser
(305) 526-6344

8:00 am — ARRIVE Orlando Airport
Page Aviation
(305) 851-6680

Met by: David Bunn
(202) 296-7277
Driven by: Penny Nichels
Wyndham Hotel Limo
(305) 351-5555

8:10 am — DRIVE to Wyndham Hotel

8:30 am — ARRIVE Wyndham Hotel
6677 Sea Harbor Drive
Orlando, Florida 32821
(305) 351-5555

Met by: Dennis Malto
(305) 351-5555

8:35 - 9:00 am — Proceed to holding room
Hinalea Room
2nd Level
(305) 351-5555 x. 622

9:05 - 9:35 am — ADDRESS American Magazine Conference

EXHIBIT 9

9304335 38669

9:05 - 9:35 am	ADDRESS American Magazine Conference Crystal Ballroom (305) 351-5555 x. 655, 656
	Format: Don Welsh, President of Lorimar Telepictures, will introduce you
	Audience: Approximately 5-600 magazine publishers and editors; including Time, Life, Newsweek, etc.
9:40 am	DEPART Wyndham Hotel
	Police Escort
	+ Staff: Doug Wilson
	+ Driven by: Wyndham Hotel Limo Penny Nichels (305) 351-5555
10:00 am	ARRIVE Orlando Airport Page Aviation (305) 851-6680
10:15 am	DEPART for JFK Airport Lorimar Jet (G2 - 11 seater)
	Pilot: Jack Zahniser Tail #: 14LT
12:30 pm.	ARRIVE JFK
	(Plane will taxi to British Airways Terminal)
12:45 pm.	ARRIVE British Airways Strip
	Met by: British Airways Representative (718) 917-5700 (24 hours) Contact: Nick Harrison, Henry Jones Hart Advance: Gary Ginsberg (212) 662-7794 (212) 280-4291
	PROCEED to B.A. terminal - check in
1:45 p.m.	DEPART JFK for London British Airways #4 Concorde
10:25 pm	ARRIVE Heathrow

9304355838870

HART Cabinet

MEMO

To: Bill Dixon, David Stein, Mike Novelli

From: Bill Shore

Date: 10/29/85

Re: Other Potential State Cabinet Leaders

The purpose of this memo is to identify a group of key supporters in each state who might be able to take the lead in setting up a State Cabinet organization along the lines David Stein has outlined.

There are, of course, many people in each state who might be able to do what needs to be done. To get us started however, I have listed for each state the names of five who for reasons of ability, enthusiasm, contacts, committment to GH, etc. would be the best candidates to solicit for their participation in leadership roles. Keep in mind that this is only my own opinion, based on either personal experience working with these people, or on what others may have told me. In several cases I've included someone's name not because of their fundraising abilities, but because of their stated and proven willingness to work hard for GH at this early stage in the 1986 cycle.

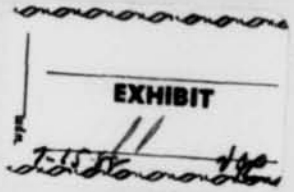
Listed first are the 10 states in which I believe this program could be the most successful. The remaining 40 follow alphabetically after that.

Complete addresses and phone numbers for all names can be found in the Hart 1000 list.

CALIFORNIA:

-- Dave Stein
-- John Emerson
-- Paul Albritton
-- Fry/Bart Dorell

EXHIBIT 40



TO : Richard Wagner

FROM: Rick Reiter

DATE: September 10, 1986

RE : Southern California Cabinet Meeting

Scheduled at Chuck Manatt's law firm for 2:30-4:00pm, this Cabinet meeting will be hosted by John Emerson (David Stein & Don Carlson are both out of town all week).

Prior to GWH arrival, John and I will brief the room on Cabinet actitity from this summer, as well as an overview on political activity within the Hart organization.

As you recall, the Cabinet is a group of individuals who have this year contributed $1,000 to Gary and meet with him whenever he is available in the region. The tone of the meeting allows for candid dialogue between Gary and this group of his closest supporters. Gary might want to touch on three areas and then let the meeting take a life of its own:

- acknowlege them as Cabinet members;
- recognize the following individuals for achieving the position of DIRECTORs for California;

  Stuart Karl, David Stein, John Emerson,

  Erv & Barb Torell, Don Carlson, Gordon Feller

  AND ENCOURAGE THE OTHERS TO PURSUE THE SAME GOAL.

- All of these people received a copy of America Can Win ten days ago; you might want to refer to it a bit.

The room will be set up around an oval conferance table which seats thirty five people. You will be approaching the head of the table when you enter the room. John will introduce Gary immediately apon his arrival, with meet & greets reserved for the end of the program. Gary can anticipate being asked to autograph individuals' copies of his book.

Attached is an alpha list of attendees.

SPECIAL NOTES: Gary was guest of RASE NATHAN last week at Asian-Indian event; DAN BISH is the guy who designed the Cabinet logo; JON & LISA BLOCH are good friends of the Gerstens; JACK BALDWIN, candidate for State Assembly, was on your Finance Committee in early '83 (his race is managed by BOB STIENS); STUART KARL is accompanied by five of his employees, all of whom have joined the Cabinet; GEORGE GORMAN advises your office on veterans issues (you saw him at S.O.S. function last week); JOHN HANNA is new County Chair for Orange County; RICHARD KATZ is a state assemblyman; ALLEN THIGPEN has been networking our Black community; EDDIE TABASH was our issues coordinator in California in '84 (anticipate him asking questions about your leadership role on the tax bill).

9304353872

Confirmation List for 9/13/86 Cabinet Meeting

JACK BALDWIN
DAN BISH
JON & LISA BLOCH
RICK BROWN
KATE CLARK
MIKE DIEDEN
BILL ELLIS
MRS. HENRY (SHIRLEE) FONDA
GEORGE GORMAN
JOHN HANNA
CARMEN HAWKINS
ED HERRERA
GARY HUNT
STUART KARL
RICHARD KATZ
BRAD KREVOY
RANA MIDDEL
TOM MOODY
DIXIE MOYER
RASE NATHAN
NICK NORTON
MIKE PETERS
RICK REITER
STEVE ROONEY
BERNIE SCHNEIDER
BOB STEINS
EDDIE TABASH
ALLEN THIGPEN

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POSSIBLES

TOM BYRNES
BRAD KREVOY
JIM McCARTHY
JUN MORI
SUSAN SHERMAN

TO: GWH
FROM: Richard Wagner
DATE: October 2, 1986
RE: Cabinet Meeting - October 9, 1986

EVENT
Meeting of Northern California Cabinet.

PURPOSE
Working session with Cabinet members.

DATE/TIME
Thursday, October 9th - 4:15-5:30pm

PLACE
3228 Sacramento Street
1st Floor
San Francisco, CA
415/931-2593

ATTENDANCE
expect 50

FORMAT
Working session, discussion with attendees.

BACKGROUND
The last Cabinet meeting in Northern California was held in March of this year. At that time, 7 people were paid members of the Cabinet. That number has now risen to 49. Don Carlson, Gordon Feller, Erv Torell, and Barbara Torell have all been working hard to get the Cabinet going in the North.

Carlson is the host of the meeting, though you may not see him. He will be bouncing back and forth between the Cabinet event and the book/Ark Communications event down the street. David Stein will be in attendance as a 'guest.'

Before you arrive, the attendees will have been through a Cabinet session involving reports on the debt, the bank debt, the direction the Cabinet should take, and national politics. A business-like environment will have been established by the time you arrive. Therefore, you can continue the meeting as a working session ie. discussion of the Cabinet, national politics, etc.

TALKING POINTS
Remarks should be breif, as you will want to get the attendees involved in two-way discussion as soon as possible. Points to be made in remarks:

)) thank Don Carlson for putting the event together.

EXHIBIT 12

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)) the Cabinet is a program you put a great deal of faith in. For the Cabinet to be successful, it needs strong directors. The directors attending (mention each by name):

Don Carlson
David Stein
Gordon Feller
Erv Torell
Barbara Torell

have done an outstanding job in pulling the Cabinet program together and making it work. When you last attended a meeting there were 7 members, now there are 49.

)) you understand others are working hard on the program, and that a good deal of progress is being had in Sacramento.

To segue into discussion:-

)) the value of the Cabinet rests with the fact that I don't often get the chance to hear ideas/share thoughts from the bottom up. Giving a speech is straightforward, but getting people's views on the substance of the speech is not as easy. That is the value of the Cabinet and these meetings. I understand many of you have received copies and hopefully read, America Can Win, and I would like to hear your comments on the book and the ideas I presented in it.

Other topics of discussion:
)) California political races
)) national races, chances for regaining the Senate in 1986.

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00073

GARY HART
COLORADO

UNITED STATES SENATE
WASHINGTON, D C
February 24, 1986

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Dear David:

Thanks for taking the time to join me in Winter Park last weekend. I can't tell you how valuable it is to have your participation in the early strategic planning that will be so critical to our future efforts. You're a great friend and I look forward to getting together again soon.

I'm sure you'll agree the success of the planning we began will depend to a great degree upon a committment to follow-up within the timeframes we discussed. I'll be very grateful if you can take whatever time is necessary to further develop and refine your thoughts and get them in writing to Bill Dixon in the next few days.

Again, thanks for your help. It was great seeing you.

Sincerely,

David Stein
Stein Brief Group
29982 Ivy Glenn
Laguna Niguel, California 92677

EXHIBIT
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To: Gary
Fr: Beth
Re: Placement of autobiographical piece
Da: April 25, 1986

Before we make a final decision, I'd like to speak with Kathy Bushkin and Stuart Karl on ideas for placement. But for the time being, I suggest the following.

Our primary target audience is the "first circle," fairly sophisticated, informed, opinion leaders. Second priority is a broader, average American voter audience. The main idea is to communicate directly with people. This is part of a long term effort to build a direct connection to voters. (A memo on the overall strategy is forthcoming, per your request.)

The publication we choose should be credible and have literary merit. We want the piece to be seen as an interesting, unique piece of writing --- not as a "political" piece. For instance, placement in the Washington Post Sunday Magazine could send exactly the wrong message.

We also probably shouldn't approach the New York Times Magazine. Their readers expect articles on trendy issues or fashions. They would not understand why you did the piece.

In "selling" the piece or explaining its purpose, we should say that people (not reporters) are always asking for the Gary Hart story. They complain about the lack of information in the press about your background, your life before New Hampshire. Since you're a writer, we thought this would be a unique way to convey a sense of Gary Hart, the man, beyond Gary Hart the candidate.

I've spoken with a few people about where this kind of piece might work. The best recommendation seems to be:

1) Esquire

The piece seems to "fit" this publication. It would be read by the "first circle" of Democratic activists. One downside is that it's a man's magazine. If the publication "asks" you to do a piece for them we could probably avoid criticism for sexual bias. (Although I don't think that criticism is likely.)

Talkers and activists would soon hear about the piece and make an effort to read it. It would be nice if the Washington press didn't hear about it until it had been out a while, after "regular" people read it and said good things about it. This piece would also have tremendous ripple effect. Political reporters might write about it, we

EXHIBIT
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can give it to reporters when they do profile pieces, we can mail it to the Hart 1000 and our target list, etc.

2) Try to get it reprinted in Reader's Digest

Reader's Digest makes a practice of reprinting articles that have appeared in other publications. Your piece seems like the kind they might use that way. It has a gigantic readership, 17m, and would give us the mass audience with whom we're trying to build a connection.

3) Other options. If Esquire doesn't bite, we could go to the following, in this order:

Atlantic
New Yorker
Harper's

9304353878

MAYBRIEF

TO: GWH
FROM: MIKE NOVELLI
DATE: MAY 20, 1986
RE: MAY 27TH LEAR DINNER

EVENT
Dinner and discussion at Norman Lear's home.

PURPOSE
To spend some 'quality' time with a group representing some of the major players in the West Los Angeles/Hollywood crowd. An excellent chance for low key, between-the-lines prospecting for financial support.

DATE/TIME
Tuesday, May 27, 1986
7:00-10:00PM (approx)

PLACE
Norman Lear's home
255 Chadbourne Avenue
Brentwood, CA
213/477-7055
(off San Vincente to Burlingame to Hanover to Chadbourne)

HOST
Norman Lear

CONTACT
Betsy Kenny (past '84 campaigner) 213/553-3636, 213/477-7055

FORMAT
Informal buffet followed by group discussion moderated by Lear. Seating is very informal, at three tables. There should be a free chair at each table should you want to table hop.

ATTENDANCE
Approx. 25 people.

SCHEDULE

7:00-7:45pm	cocktails
7:45-8:45pm	dinner
approx 8:45pm	break for dessert and discussion in screening room Lear will intro you 10 mins. of remarks to begin discussion

EXHIBIT
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BACKGROUND
Lear holds these dinner/discussion groups on a regular basis and has a standard invitation list. The group this evening will be a subset of that list (ie. Steve & Kitty Moses have not been invited as they were just in DC.) These dinners attract an elite group - the master invitation list reads like a Who's Who of West LA and Hollywood. Confirmed attendees as of today are:-

Ted & Barbara Field
Heir to the Marshall Field fortune. Dabbles in film production (Interscope Productions), real estate, and politics (on Van DeKamp's finance committee).

Bob & Sally Burkett
Burkett now works as Field's politcal gun.

Carl & Debbie Rheuban
President of a local savings bank. Young, very tight with the LA Jewish community.

Stanley & Anita Hirsch
Stanley is head of the Jewish Federation.

Sarah Pillsbury & Richard Kletter
Married couple, Sarah is indeed a member of the Pillsbury dough-boy family. Young, socially conscious/active.

Paul Schafer
VP of Norman's company, Act III Communications.

Lynn Davis
Norman Lear's escort/date for the evening.

David Stein
FYI David has been passing through some troubled waters recently vis a vis financing. The past few weeks have been spent refinancing major loans. Apparently all is working out for the best, though.

Warren Beatty (at last report)

Stanley and Betty Sheinbaum
LA attorney, you know him. Last official business for the campaign was the December 1984 brunch Stanley and Betty hosted at their home.

Barbara Cordey & Barney Rosensweig
Both in television production. Barbara is a member of the Hollywood Women's Coalition.

Marilyn & Alan Bergman
Marilyn is also a member of the Hollywood Women's Coalition.

Irving & Shelly Azoff
President of MCA Records.

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The dinners are very relaxed and informal. Usual procedure is to break from the tables after dinner and wander over to the screening room for dessert and discussion. Seating in the room will be approximately circular. Lear moderates the discussion.

TALKING POINTS

Since the business of the evening is the give and take of issue-oriented, open discussion, remarks do not have to be extensive. Discussion will undoubtedly range over a number of issues and will probably include a good bit of analysis of the current political year ie. how it looks for Democrats in '86. And, of course, there will be curiosity about 1988.

NB:- The combined net worth of those attending this dinner is astronomical and, therefore, from a fundraising perspective this could be a worthwhile event. Lear, however, looks upon this solely as a private dinner in his home. Discussion of financing/fundraising on your part should come only as a response to a direct question, if it arises.

Opening Remarks - 10 minutes max.

) thank Norman for the invitation to the dinner

) let those attending know that sessions such as the one this evening, of individuals coming together discussing issues etc., is the stuff of the political process, be it in a fine LA home or in a Grange in some rural county. Thank them for coming and their interest and activism in the political process.

) fill the rest of the time with a short commentary on your recent activities in the Senate, and a mention of 'America Can Win' and the miltary reform debate.

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Final Agenda for Denver, Colorado Meeting
July 11 - 13, 1986

FRIDAY EVENING: Arrivals by 4:00 pm

4:30 - 6:15	Reception sponsored by the Colorado Host Committee at the Forum Room, Executive Tower Inn. Informal dinner arrangements can be made at the reception since no formal dinner is planned.

SATURDAY:

8:00 - 9:00	Continental Breakfast at Executive Tower Inn, Second Floor Forum Room
9:00	FIRST SESSION BEGINS
9:00 - 9:15	Welcome by Bill Dixon, overview of what we intend to accomplish during the weekend, description of agenda, opening remarks
9:15 - 9:45	Bill Dixon and Bill Shore, summary of overall political strategy for 1986 and the future.
9:45 - 10:00	Q&A
10:00 - 10:45	Panel of Mike Moore, Richard Wagner, Jack Quinn and Bill Dixon to discuss: debt retirement, fundraising strategy, FEC compliance, and related campaign finance matters.
10:45 - 11:15	Q&A
11:15 - 12:00	Panel of Bill Morton, Jack Quinn, Bill Dixon and Bill Shore to discuss Fairness Commission rules, changes in 1988 calendar, delegate selection procedures, DNC and automatic delegates.
12:00 - 12:15	Q&A
12:15 - 1:30	Lunch

EXHIBIT 16

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1:30	SECOND SESSION BEGINS
1:30 - 2:15	Panel of Jon Mills, John Emerson, Sue Casey, Chris Brown, John Kulewicz and Rick Ridder to discuss organizing techniques, recruitment of elected officials into state organizations, integration of party establishment, and related matters.
2:15 - 2:30	Q&A
2:30 - 3:00	Panel of Greg Lebel, Chris Phillips, and Bill Shore to discuss 1986 elections, candidates GH is helping, The Volunteer Committee, etc.
3:00 - 3:45	Panel discussion on issues, themes, press -- Kevin Sweeney and others.
4:00 - 4:15	BREAK. ARRIVAL OF GWH. MIX AND MINGLE.
4:15	SECOND SESSION CONTINUES
4:15 - 4:45	GWH speaks on his vision of where the country is headed, major themes, etc.
4:45 - 5:30	Open group discussion with GWH
5:30 - 6:30	DOWNTIME
6:45	Van/bus departure to dinner. **PROMPT DEPARTURE IS ESSENTIAL**
7:00	Dinner at the Denver Kent Day School Casual dress

SUNDAY:

7:00 - 7:45	Continental Breakfast at ETI. Second floor Forum Room.
7:45	THIRD SESSION BEGINS
7:45 - 8:15	Panel discussion by Chris Phillips and Richard Wagner on communications networks -- both intra and interstate: lists, newsletters, etc.

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8:15 - 9:00	Summary and wrap-up by Bill Dixon and Bill Shore. Outline of specific requests of state leaders for the future.
9:00 - 9:30	Checkout time from ETI.
9:30	Depart for Gary and Lee's home at Troublesome Gulch. **PROMPT DEPARTURE IS ESSENTIAL.**
10:30 - 1:00	Picnic lunch at Troublesome Gulch with Gary and Lee. Casual attire
1:00	Retreat ends. Open time. Departures for Denver and the airport.

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TO: GWH

FROM: Bill Shore

DATE: August 1, 1986

RE: California Scheduling Items

EXHIBIT 17

You have trips scheduled to California in August, September and October. The August trip is basically R & R, the September trip will be all fundraising and the October trip will consist almost entirely of campaigning for 1986 candidates.

There are several questions about the schedule for August and September that we need you to decide on.

1. August Trip. You are scheduled to fly to Los Angeles on Monday, August 25 and remain there until your 10:00 a.m. speech on Saturday, August 30 after which you fly to Venice. At this time, there is nothing else on your schedule at all. We would recommend, however, adding just 3 other items, perhaps all on the same day (Thursday, the 28th). They are:

(a) Lunch or drinks with a group Al Gersten would put together. They would be the people that will end up co-chairing and raising the funds for our October and January fundraisers in California.

(b) Afternoon video session with Bill Zimmerman (and perhaps Stuart Karl) to discuss communications strategy. Zimmerman has told Bill Dixon and I that he has some very interesting work he would like to show you.

(c) 5:30 - 6:30 p.m. Drop-by at a Share Our Strength fundraiser being hosted by five of the better Beverly Hills restaurants - - (Valentinos, Le Chardonny, Orleans Restaurant, Le Toque and St. Estephe's).

Again, all this could be done in one day and nothing else would go on your schedule.

_____Yes _____No

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2. September Schedule

California from Friday, Sep
Saturday would consist of f
Los Angeles Chinese-Americ

e in
14.

This is the trip in whi
in Las Vegas. You have grea
in that state, especially wi
short stop on this trip woul
amount of money right away,
and January. No casino peop

top
al

r

The only question is whe
on Friday, or coming back on
Senate business could screw u
logistics on Sunday are not g
Los Angeles at 10 a.m., arriv
Las Vegas at 1:55 p.m. and ar

ut

ng

Dulles at 10:30 p.m.

I'd recommend doing it this way. And if you can get to Los Angeles Friday night, it would simply be an open evening. However, we could put Las Vegas on Friday and take the risk, in which case you could have Sunday free in Los Angeles or fly back to D.C. Sunday afternoon.

Again, we recommend against this.

Ltt Las Vegas Friday _____ Las Vegas Sunday

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SCHEDULE FOR SENATOR GARY HART
Saturday, October 11, 1986

10.30 am — DRIVE to Press Conference

+Driven by: Rick Allen or Dennis Walto

11.00 - 11.30 am — PRESS CONFERENCE with Sen. Cranston
Federal Building
Corner of Wilshire and Veteran Blvds.
Westwood, CA 213/453-8871

11.30 am — DRIVE to Santa Monica Airport

12:15 pm — DEPART for Santa Barbara
Santa Monica Airport
California Aviation
2501 Airport Avenue
Santa Monica 213/397-2186

Santa Barbara Aviation 805/967-5608

+ Traveling party: GWH, Bill Shore, John Emerson, Rick Allen, GKH aide Steve Weiss

[12:00 noon]

+ NB: Jerry Soderberg will drive to Malibu events
+ Tail No: 2VB
+ Pilot: Eric Rood

11:30 - 12:15 pm 12:10

1:00 pm — ARRIVE Santa Barbara airport
Santa Barbara Aviation

+ Met by Gary K. Hart

EXHIBIT 18

1:00-1:20 pm — DRIVE to Montecedo event

+ Driven in limo by: Tom Ruggiero of Walter's Limousine, 805-969-9072

1:20-2:30 pm — FUNDRAISER for Gary K Hart
Home of Mary Ann Mott and Herman Warsh
1915 San Leandro Lane
Montecedo 805/969-1760

+ Format: Mingle, GKH to introduce GH, Brief remarks by GH; press availability
+ Audience: 200 people at $100 a person

2:30-3:45 pm — DRIVE to Malibu

+ Driven in limo by: Tom Ruggiero

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3:45-4:45 pm	FUNDRAISER for Gary K Hart Home of Howard and Marlene Hatlow 28970 Cliffside Road Malibu 213/457-3671 + Format: Mingle, GKH to introduce GH, brief remarks by GH, followed by brief press availability + Audience: 200 people at $100 a person + NB: John Tunney, Bill Broadhurst and Jerry Soderberg to join here
4:45-5:15 pm	DRIVE to Mark Green fundraiser + Driven by: Rick Allen or Dennis Walto
5:15-5:45 pm	FUNDRAISER for Mark Green Stanley Sheinbaum's home 333 N. Rocingham Brentwood
5:45-5:55 pm	DRIVE to Dick Robinson's fundraiser + Driven by: Rick Allen of Dennis Walto
5:55-6:45 pm	FUNDRAISER for Dick Robinson Home of Steve and Kitty Moses West LA 213/458-9408 + Audience: 30 people, $500 per + Format: mingle, brief remarks
6:45 pm	DRIVE to Gersten event + Driven by: Rick Allen or Dennis Walto
7:00 pm	PROSPECTING DINNER hosted by Al and Marilyn Gersten 611 North Canon Beverly Hills, CA 213/272-8200 + Audience: 100 people + Format: Mingle, introduction by Al Gersten, brief remarks, q and a
8:30 pm	DEPART Dinner + Driven by: Rick Allen or Dennis Walto
RON	WB

9304358888

Senator John Garamendi

January 21, 1987

Mr. Morris Bernstein
1791-A Pine Street
San Francisco, CA 94109

Dear Mo:

The January 28th dinner at the St. Francis Hotel is really coming together. It will be a great night and I'm sure you're as anxious as I am to hear what Gary Hart has to say.

Our schedule for the day calls for us to have a private meeting with Gary Hart for one hour beginning at ~~5:45~~ 6:45 pm in the Kent Room at the St. Francis. Gary wants to meet you and talk about his presidential campaign. Joining us at this meeting will be:

Martin Harmon	Diane McKenna
Bobbie Quick	Regis McKenna
Blaine Quick	John Freidenrich
Karen Loewenstern	Warren Hellman
Jack Smith	Frank Damrell
Stuart Karl	Janice Ury
Don Carlson	

A special private reception begins at 6:00 pm and dinner at 7:30 pm as previously scheduled. Gary will speak about 8:00 pm and dancing will follow.

Patti and I are looking forward to seeing you at 5:45 pm for the Hart meeting.

Sincerely,

JOHN GARAMENDI

JG/mp

BK Ginny
CNN
Time watch
CNN

EXHIBIT 19

P.O. BOX 1647, Sacramento, California 95808
916/446-6881

PRINTED ON RECYCLED PAPER

9304353889

DENVER FINANCE MEETING

February 24, 1987

12:00 Luncheon

Rattlesnake Club
Tivoli Center
901 Larimer Street

2:00 - 5:00 Business Session

Rattlesnake Club

Campaign Overview	William Dixon
1987 Budget	David Miller
Funding Methodologies	
Overview	Eli Segal
Video Project	Stuart Karl
National Finance Structure	Michael Novelli
Candidate Utilization Lee Hart	William Shore
April Announcement Denver Gala	William Dixon Norman Brownstein
Pledges	

7:00 Dinner

Home of Sunny and
Norm Brownstein
66 Sedgwick Place

EXHIBIT
20

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* * Finance Meeting * *

February 24, 1987

Jon Bloch
Frank Damrell
Al Gerston
Stuart Karl
Steven Moses
Kitty Moses
Doug Rosen
Bernie Schneider
John Tunney
Norm Brownstein
Mark Hogan
Micky Miller
Buie Seawell
Smith Bagley
Sidney Harman
Marvin Rosen
Bob Patrick
Phil Rollhaus
Bill Broadhurst
Jerry Soderberg
Michael Johnston
Jim Barrett
Jim Calaway
Connie Calaway
Sandy Yurish added

Don Montgomery
Phil Schaefer
Al Del Bello
William Dixon
William Shore
Jon Emerson
Mike Novelli
Eli Segal
Carla Reames
Rick Hutto
Mary Alice Manderich
Kilian Kerwin

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• • Dinner Attendees • •

Jon Bloch

Al Gersten

Kitty & Steve Moses

Doug Rosen

Bernie Schneider

Mark Hogan

Smith Bagley

Sidney Harman

Marvin Rosen

Bob Patrick

Frank Damrell

Phil Rollhaus

Bill Broadhurst

Jerry Soderberg

Jim Barrett

Connie Calaway

Don Montgomery

Phil Schaefer

Al Del Bello

Sandy Yarfish

Norm & Sunny Brownstein

Lee & Gary Hart

Andrea Hart

William Dixon
Jon Emerson
Mike Novelli
Eli Segal

Carla Reames
Rick Hutto
Mary Alice Manderich
Kilian Erwin
Linda Spangler
Keith Wessel (photographer)

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DENVER FINANCE MEETING

February 24, 1987

12:00	Luncheon	Rattlesnake Club Tivoli Center 901 Larimer Street
2:00 - 5:00	Business Session	Rattlesnake Club
	Campaign Overview	William Dixon
	1987 Budget	David Miller
	Funding Methodologies	
	Overview	Eli Segal
	Video Project	Stuart Karl
	National Finance Structure	Michael Novelli
	Candidate Utilization Lee Hart	William Shore
	April Announcement Denver Gala	William Dixon Norman Brownstein
	Pledges	
7:00	Dinner	Home of Sunny and Norm Brownstein 66 Sedgwick Place

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* * Dinner Attendees * *

Jon Bloch

Al Gersten

Kitty & Steve Moses

Doug Rosen

Bernie Schneider

Mark Hogan

Smith Bagley

Sidney Harman

Marvin Rosen

Bob Patrick

Frank Damrell

Phil Rollhaus

Bill Broadhurst

Jerry Soderberg

Jim Barrett

Connie Caleway

Don Montgomery

Phil Schaefer

Al Del Bello

Sandy Yarrish

Norm & Sunny Brownstein

Lee & Gary Hart

Andrea Hart

William Dixon
Jon Emerson
Mike Novelli
Eli Segal

Carla Reames
Rick Hutto
Mary Alice Mandarich
Kilian Kerwin
Linda Spangler
Keith Wessel (photographer)

* * Y E S * *

Name	Comments
Jon Bloch	
Frank Damrell	Will try
Al Gersten	
Stuart Karl	No dinner
Steve Moses	
Kitty Moses	
Doug Rosen	
Bernie Schneider	
John Tunney	NO dinner
Norm Brownstein	Hosting Dinner
Mark Hogan	
Micky Miller	No dinner
Buie Seawell	No dinner
Smith Bagley	
Sidney Harman	
Marvin Rosen	
Bob Patrick	
Phil Rollhaus	
Bill Broadhurst	In Denver; follow up letter not sent
Jerry Soderberg	
Michael Johnston	No dinner
Jim Barrett	
Jim Calaway	
Connie Calaway	

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* * Finance Meeting * *

February 24, 1987

Jon Bloch
Frank Damrell
Al Gerston
Stuart Karl
Steven Moses
Kitty Moses
Doug Rosen
Bernie Schneider
John Tunney
Norm Brownstein
Mark Hogan
Micky Miller
Buie Seawell
Smith Bagley
Sidney Harman
Marvin Rosen
Bob Petrick
Phil Rollhaus
Bill Broadhurst
Jerry Soderberg
Michael Johnston
Jim Barrett
Jim Calaway
Connie Calaway

Don Montgomery
Phil Schaefer
Al Del Bello
William Dixon
William Shore
Jon Emerson
Mike Novelli
Eli Segal
Carla Reames
Rick Hutto
Mary Alice Mandarich
Kilian Kerwin

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MEMO

TO: SUE, GREG, SHORE, EMMO

FROM: WALTO

RE: ADVANCE IN APRIL/MARCH

DATE: 17 FEB 1987

the following are trips in which i feel that advance is needed. as my expenses and travel present no burden to the campaign, i feel my presence can serve to both advance the event and begin to network the existing advance talent in those areas. if anyone see's the need for additional trips, i am always willing to entertain the suggestion and hit the road if necessary.

EXHIBIT
21

9304335-38897

TRANSCRIPT OF PROCEEDINGS

UNITED STATES OF AMERICA

BEFORE THE

FEDERAL ELECTION COMMISSION

IN THE MATTER UNDER REVIEW

NUMBER 2583

DEPOSITION OF KEITH GLASER

FEDERAL ELECTION COMMISSION
OFFICE OF
88 NOV -1 PM 2:48

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Denver, Colorado

Tuesday, October 4, 1988

ACE-FEDERAL REPORTERS, INC.
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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter Under Review 2583

Deposition of Keith Glaser

U. S. Attorney's Office
Federal Building
1961 Stout Street
Denver, Colorado 80294

October 4, 1988
10:10 a.m.

The deposition of KEITH GLASER was taken before VIOLA J. LUNDBERG, Registered Professional Reporter, Certified Shorthand Reporter, and Notary Public, State of Colorado.

APPEARANCES:

CELIA JACOBY, Attorney at Law, Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, appearing on behalf of the Federal Election Commission.

LEE D. FOREMAN, Attorney at Law, HADDON, MORGAN & FOREMAN, P.C., 1034 Logan Street, Denver, Colorado 80203, appearing on behalf of the witness.

ACE-FEDERAL REPORTERS, INC.
400 North Capitol Street, N.W.
Washington, D.C. 20001
800-336-6646

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PROCEEDINGS

MS. JACOBY: Gentlemen, we are present today as part of an investigation under Section 437(g) of Title 1, United States Code.

The Federal Election Commission has jurisdiction over the Federal Election Campaign Act for civil enforcement and has designated this matter as Matter Under Review No. 2583. This matter must be held in confidence.

KEITH GLASER,

called as a witness, being first duly sworn, was examined and testified as follows:

EXAMINATION

BY MS. JACOBY:

Q. Mr. Glaser, would you state your name and address for the record?

A. My name is Keith Glaser, G-l-a-s-e-r. [redacted]

Q. Are you represented by counsel today?

A. I am.

Q. Would you please identify your

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counsel?

A. Lee Foreman.

Q. Mr. Glaser, I gave you a set of instructions concerning the conduct of a deposition. Did you read those instructions?

A. I did.

Q. Did you understand them?

A. Yes.

Q. Do you have any further questions concerning them?

A. No.

Q. On March 3rd, 1988, the Commission issued a subpoena to you to produce certain documents. We've received no documents in response to that subpoena.

Do you have any to produce today?

A. I do not have any documents.

MR. FOREMAN: For the record I will state that we did correspond with the Commission earlier and indicated that Mr. Glaser is not and was not on the date of receipt in possession of any of the documents that were described by the subpoena,

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and by informing the Commission of that, it was our position at least that we had fully complied with that part of the commands of the subpoena.

I just didn't want the record to be misunderstood as somehow indicating that we were in possession of documents responsive to the subpoena that we were declining to produce.

MS. JACOBY: We understand that.

Q. (By Ms. Jacoby) We just wanted to clarify that during the interim period you have not obtained any?

A. No.

Q. Are you aware of the existence of any documents though not in your possession which would be responsive to the Commission?

A. I'm not.

Q. Could you please describe for us your educational background?

A. I received my undergraduate degree from the University of Cincinnati in economics and went to law school at Harvard Law School.

Q. Are you currently employed?

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A. Yes.

Q. Where are you employed?

A. In a company called Smith Co-Generation in Oklahoma City.

Q. And what have been your dates of employment?

A. I have been there since January of this year.

Q. And prior to that?

A. I was employed and a partner in a real estate development firm called several names but J. Ray Development in California.

Q. What dates were you so employed?

A. January of 1986 through the end of 1987, December 1987.

Q. And prior to that place of employment where were you employed?

A. I worked for Congressman Richard Gephardt for the entire year of 1985.

Q. And prior?

A. I decline -- upon advice of counsel I respectfully decline to answer on the grounds that it

9304350390 3

may tend to incriminate me.

Q. Mr. Glaser, I'm not authorized to compel you to give testimony or evidence as to which you assert your privilege against self-incrimination nor am I authorized to grant you immunity. Each question I ask you will be with the understanding that if you wish to assert your privilege, you may so simply state for the record.

If you do answer, you will be answering voluntarily; is that correct?

A. Correct.

Q. Were you associated with the 1984 presidential campaign of Senator Hart, Gary Hart?

A. I respectfully decline to answer.

Q. Could you tell me what responsibility or duties you had to that committee?

A. Upon the advice of counsel I respectfully decline to answer.

Q. Would you please identify Michael Moore by telling us his role in the 1984 campaign of Mr. Hart?

A. I respectfully decline to answer.

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MS. JACOBY: Could we go off the record a minute?

(Discussion off the record.)

MS. JACOBY: On the record.

Off the record we discussed the form of questions to be asked, and Mr. Foreman agreed that the form of the questions will not be objected to if they are complex or compounded.

Q. (By Ms. Jacoby) Mr. Glaser, I'd like to give you a series of names and as to each person will you please tell me what role he had in the 1984 presidential efforts of Mr. Hart. Oliver Henkell?

A. I respectfully decline to answer.

Q. James Dwinell?

A. I respectfully decline to answer.

Q. Douglas Rosen?

A. I respectfully decline to answer.

Q. Scott Van Hove?

A. I respectfully decline to answer.

Q. Richard Wagner?

A. I respectfully decline to answer.

Q. McKay Daines?

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A. I respectfully decline to answer.

Q. William or Bill Shore?

A. I respectfully decline to answer.

Q. William or Bill Dixon?

A. I respectfully decline to answer.

Q. Beth Smith?

A. I respectfully decline to answer.

Q. Would you please identify who within the 1984 committee had any responsibility for the campaign efforts in California?

A. I respectfully decline to answer.

Q. How frequently did you speak with or interact with the named persons?

A. I respectfully decline to answer.

Q. Will you please identify for us who within the '84 campaign had the authority to contract with vendors?

A. I respectfully decline to answer.

Q. Would you please identify who had the authority to disburse funds?

A. I respectfully decline to answer.

Q. Did you personally do any traveling on

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behalf of the '84 campaign?

A. I respectfully decline to answer.

Q. Who arranged or coordinated that travel for you?

A. I respectfully decline to answer.

Q. Who authorized payment for that travel?

A. I respectfully decline to answer.

Q. Would you please describe for us how travel was arranged for the staff of Mr. Hart's committee?

A. I respectfully decline to answer.

Q. Please describe for us how campaign workers accounted for their expenses including what documentation they had to provide and to whom that was given?

A. I respectfully decline to answer.

Q. Who, to your knowledge, had responsibility for fund raising operations in this committee?

A. I respectfully decline to answer.

Q. Did you attend any meetings where

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fund raising in general or specific methods were discussed?

A. I respectfully decline to answer.

Q. With regard to each such meeting will you please describe who attended, what was said, and the dates?

A. I respectfully decline to answer.

Q. Did you ever discuss fund raising methods?

A. I respectfully decline to answer.

Q. With whom did you discuss those methods and would you please tell us what methods you talked about?

A. I respectfully decline to answer.

Q. Would you please describe all meetings at which fund raising was discussed?

A. I respectfully decline to answer.

Q. Is there anything you can tell us about the financial structure and authority of the '84 Hart committee?

A. I respectfully decline to answer.

Q. Do you know Stuart Karl or George

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Stuart Karl?

A. I respectfully decline to answer.

Q. Who introduced you to him and when?

A. I respectfully decline to answer.

Q. Would you please describe your association with Mr. Karl and tell us about each of your contacts with him?

A. I respectfully decline to answer.

Q. What was the nature of those contacts?

A. I respectfully decline to answer.

Q. Did you ever meet with him, telephone him or write letters or travel with Mr. Karl?

A. I respectfully decline to answer.

Q. What services did Mr. Karl provide to the '84 committee?

A. I respectfully decline to answer.

Q. Did Mr. Karl ever host any fund raisers?

A. I respectfully decline to answer.

Q. As to each fund raiser he hosted, would you please tell us the date and place of that event?

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A. I respectfully decline to answer.

Q. How would you characterize the role of Mr. Karl in the '84 campaign?

A. I respectfully decline to answer.

Q. Did you attend any meetings at which Stuart Karl was mentioned or discussed by committee officials?

A. I respectfully decline to answer.

Q. As to each such meeting, would you tell us who attended and what was said and the date?

A. I respectfully decline to answer.

Q. Did you attend any meetings related to the campaign at which Mr. Karl was present?

A. I respectfully decline to answer.

Q. Would you describe each such meeting?

A. I respectfully decline to answer.

Q. Are you familiar with a company known as Karl Home Video, Inc.?

A. I respectfully decline to answer.

Q. Please tell us what services that company provided to the '84 committee.

A. I respectfully decline to answer.

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Q. Who in the committee arranged for those services?

A. I respectfully decline to answer.

Q. Would you describe all the collection efforts that the company undertook to collect its debts?

A. I respectfully decline to answer.

Q. Do you know if the debt owed by the '84 committee to this company was settled or negotiated?

A. I respectfully decline to answer.

Q. Please tell us who participated in those settlement negotiations.

A. I respectfully decline to answer.

Q. Do you know a Rama White or Rama Middel?

A. I respectfully decline to answer.

Q. Who introduced you to her?

A. I respectfully decline to answer.

Q. When was that?

A. I respectfully decline to answer.

Q. Please describe all dealings that you

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had with Ms. Middel.

A. I respectfully decline to answer.

Q. When I say Ms. Middell, I'm also referring to Rama White. Did you have any telephone calls with her?

A. I respectfully decline to answer.

Q. Would you please tell us the substance of those conversations?

A. I respectfully decline to answer.

Q. Did you ever write a letter to her?

A. I respectfully decline to answer.

Q. Would you please tell us the subject matter of those letters?

A. I respectfully decline to answer.

Q. Did you ever contact Ms. Middel to arrange services for the committee?

A. I respectfully decline to answer.

Q. Did you ever contact Ms. Middel to arrange transportation for the committee or for Mr. Hart?

A. I respectfully decline to answer.

Q. Did you ever contact Ms. Middel to

9304358391 2

arrange payment to committee vendors?

A. I respectfully decline to answer.

Q. With respect to services, transportation and vendor payments, would you please describe each incident including the date, the type of service or transportation, the amount of payment and the name of the vendor?

A. I respectfully decline to answer.

Q. Who associated with the '84 committee would have had dealings with Ms. Middel to your knowledge?

A. I respectfully decline to answer.

Q. Did anyone direct you to contact Ms. Middel?

A. I respectfully decline to answer.

Q. Who was that person?

A. I respectfully decline to answer.

Q. Did you attend the 1984 Democratic Convention?

A. I respectfully decline to answer.

Q. What role or functions did you perform at the Convention on behalf of the '84 committee?

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A. I respectfully decline to answer.

Q. Would you please identify all vendors who furnished goods or services to the '84 committee during or around the time of the 1984 Democratic Convention?

A. I respectfully decline to answer.

Q. What services were provided by those vendors?

A. I respectfully decline to answer.

Q. I'm going to give you a sheet of paper listing a number of vendors, not as an exhibit, simply to help you as we go through these questions.

Do you recall dealing with a firm named Wing Aero to provide services to the committee?

A. I respectfully decline to answer.

Q. Do you recall a firm named National Screen Print or National Screen Print of the Bay Area providing services to the committee?

A. I respectfully decline to answer.

Q. Do you remember a firm called Warren

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Lawler Press providing services to the committee?

A. I respectfully decline to answer.

Q. Did Debra Walker provide services to the committee?

A. I respectfully decline to answer.

Q. Did Contract Reproductions Company, Inc., provide any services to the committee?

A. I respectfully decline to answer.

Q. Did Kindel Graham provide any services to the committee?

A. I respectfully decline to answer.

Q. Did Blake Moffit and Towne provide any goods or services to the committee?

A. I respectfully decline to answer.

Q. Did More Plastic Bags provide any services to the committee?

A. I respectfully decline to answer.

Q. Did Tubes and Cores, Inc., provide any services to the committee?

A. I respectfully decline to answer.

Q. Did American Printing Company or American Printing and Copy Company provide any

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services to the committee?

A. I respectfully decline to answer.

Q. Did The Grace Company provide any services to the committee?

A. I respectfully decline to answer.

Q. Did Jack Nadel, Inc., provide any services to the committee?

A. I respectfully decline to answer.

Q. With regard to each of those above named vendors, what services did each provide?

A. I respectfully decline to answer.

Q. How were those services arranged for?

A. I respectfully decline to answer.

Q. How were the services paid?

A. I respectfully decline to answer.

Q. By whom were the services paid?

A. I respectfully decline to answer.

Q. Were any other vendors used to get promotional materials during the '84 convention?

A. I respectfully decline to answer.

Q. Would you identify each of those vendors?

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A. I respectfully decline to answer.

Q. Please tell us who contracted with each vendor and when each and by whom each was paid.

A. I respectfully decline to answer.

Q. Would you please name for us the campaign staff who attended the convention?

A. I respectfully decline to answer.

Q. Please identify the campaign staff who worked in the San Francisco area during June and July, 1984.

A. I respectfully decline to answer.

Q. Was transportation made available to the campaign workers in San Francisco during the convention?

A. I respectfully decline to answer.

Q. Which campaign staffers had access to transportation vehicles?

A. I respectfully decline to answer.

Q. What agency was used to acquire these vehicles?

A. I respectfully decline to answer.

Q. Do you recall if the firm Goodlife

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Travel was used as the rental agency?

A. I respectfully decline to answer.

Q. Was Midway Ford Rent-A-Car used as the travel agency?

A. I respectfully decline to answer.

Q. Was Budget Rent-a-Car of San Jose the travel agency through which the cars were obtained?

A. I respectfully decline to answer.

Q. How many rental vehicles were made available to the campaign staff?

A. I respectfully decline to answer.

Q. Who arranged for these vehicles to be leased?

A. I respectfully decline to answer.

Q. Who paid for the vehicles and what was that estimated cost?

A. I respectfully decline to answer.

Q. Who within the committee contacted Ms. Middel or Stuart Karl to make arrangements for the lease of these vehicles?

A. I respectfully decline to answer.

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Q. Who gave the names and the amounts owed to committee vendors to Rama White?

A. I respectfully decline to answer.

Q. Who gave those names and amounts to Stuart Karl?

A. I respectfully decline to answer.

Q. Who would be in a position to know that information?

A. I respectfully decline to answer.

Q. The New York Times quoted you as stating that persons on the financial side of the committee instructed you to contact Stuart Karl's office whenever supplies were needed at the convention. Who so instructed you?

A. I respectfully decline to answer.

Q. Who did you contact at Mr. Karl's office?

A. I respectfully decline to answer.

Q. Did you contact anyone else?

A. I respectfully decline to answer.

Q. Did you instruct anyone to contact Mr. Karl's office?

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A. I respectfully decline to answer.
Q. Would you please identify that person?
A. I respectfully decline to answer.
Q. What supplies were requested in this manner?
A. I respectfully decline to answer.
Q. Is there anything else you can tell us about vendors who supplied goods and services to the committee particularly around the convention time?
A. I respectfully decline to answer.
Q. What else can you tell us about how committee vendors were paid?
A. I respectfully decline to answer.
Q. Do you recall a firm known as Zimmerman, Galanty?
A. I respectfully decline to answer.
Q. What services did that company provide to the '84 committee?
A. I respectfully decline to answer.
Q. How was that company paid?
A. I respectfully decline to answer.
Q. Are you familiar with the procedure to

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transfer money by interbank depository or wire transfer?

A. I respectfully decline to answer.

Q. To the extent of your knowledge, did the committee pay any vendor through such wire transfers or interbank transfer?

A. I respectfully decline to answer.

Q. Could you describe the procedure through which the committee made such transfers?

A. I respectfully decline to answer.

Q. Were wire transfers handled through the committee's accounts?

A. I respectfully decline to answer.

Q. Please identify the accounts that the committee used.

A. I respectfully decline to answer.

Q. Who within the committee would have handled such wire transfers?

A. I respectfully decline to answer.

Q. What vendors were paid through a wire transfer?

A. I respectfully decline to answer.

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Q. Do you recall the name J. -- the initial J. -- McEwen?

A. I respectfully decline to answer.

Q. What services did J. McEwen provide to the '84 committee?

A. I respectfully decline to answer.

Q. How was this creditor paid?

A. I respectfully decline to answer.

Q. Were committee vendors paid by anyone other than the committee?

A. I respectfully decline to answer.

Q. Did Stuart Karl pay any debts or bills owed by the committee?

A. I respectfully decline to answer.

Q. What debts did Mr. Karl pay or authorize to be paid?

A. I respectfully decline to answer.

Q. Did you request Ms. Middel to arrange a wire transfer of funds on behalf of the committee?

A. I respectfully decline to answer.

Q. To whom did she make such transfers

9304358392 2

and when?

A. I respectfully decline to answer.

Q. Did anyone else associated with the committee request Ms. Middel to make a wire transfer to a committee vendor?

A. I respectfully decline to answer.

Q. To make a wire transfer to any committee account?

A. I respectfully decline to answer.

Q. In your work with the committee did you observe advance persons?

A. I respectfully decline to answer.

Q. Would you describe in general the duties and functions of an advance person?

A. I respectfully decline to answer.

Q. How did the advance staff coordinate its activities with those of the candidate?

A. I respectfully decline to answer.

Q. Would you describe for us the typical day of an advance person including the number of hours they were expected to work?

A. I respectfully decline to answer.

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Q. What was your interaction with the advance staff?

A. I respectfully decline to answer.

Q. How frequently and what types of contacts did you have with the advance staff?

A. I respectfully decline to answer.

Q. Did you know Dennis Walto?

A. I respectfully decline to answer.

Q. When did you meet him?

A. I respectfully decline to answer.

Q. To the best of your knowledge, would you describe his training, experience, and education?

A. I respectfully decline to answer.

Q. Please describe for us Mr. Walto's association with the '84 committee.

A. I respectfully decline to answer.

Q. Do you know if Mr. Walto was associated with Friends of Gary Hart, Inc., the 1988 presidential campaign of Senator Hart?

A. I respectfully decline to answer.

Q. Would you describe his association

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with the '88 committee?

A. I respectfully decline to answer.

Q. Do you know if Mr. Walto had employment during 1986 in addition to his activities with the '88 committee?

(Mr. Foreman conferred with the witness.)

A. Could you ask that question again, please?

Q. (By Ms. Jacoby) Are you aware if Mr. Walto had any employment in addition to his activities on behalf of the 1988 committee?

A. I'm not aware of that.

Q. Do you know if the '84 committee or if the candidate held meetings or events designated as retreats?

A. I respectfully decline to answer.

Q. What was the purpose of such meetings or retreats?

A. I don't know the answer.

Q. Did you ever attend a retreat?

(Mr. Foreman conferred with the

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witness.)

A. No.

Q. (By Ms. Jacoby) Do you know who was invited to attend retreats and what criteria were used to issue those invitations?

A. I don't know the answer to that.

Q. Do you know who sponsored the retreats?

A. No.

Q. Do you know how the retreats were financed?

A. No.

Q. Do you know what discussion areas were had at the retreats?

A. No.

Q. Is there anything you can tell us about the retreats sponsored by the '84 committee?

A. Nothing.

Q. Were you aware that certain persons may have had their contributions reimbursed?

(The witness conferred with Mr. Foreman.)

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MR. FOREMAN: If you don't know, you don't know.

A. I have no such knowledge. I don't know.

Q. (By Ms. Jacoby) Would you repeat that?

A. I don't know.

Q. Did anyone discuss the reimbursement of contributions with you?

A. No.

Q. Would you describe any meetings where reimbursement of contributions was discussed?

A. I was never involved in any such meetings.

Q. Who, to your knowledge, was aware that certain contributions were being reimbursed?

A. I -- I don't know.

(The witness conferred with Mr. Foreman.)

Q. (By Ms. Jacoby) Did anyone ever advise you or the committee that reimbursement of contributions would be illegal?

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A. No.

Q. To your knowledge --

A. Let me stop. I don't know about advising the committee. I never was -- I never discussed it with anybody or had it discussed with me.

Q. Thank you. Any time a question seems unclear to you, please stop me and, you know, I'll try to clarify. The same if you feel you misstate yourself or have given an incomplete answer stop and clarify the record.

A. All right.

Q. Do you know if a scheme to reimburse contributions was ever proposed?

A. I do not know.

Q. Okay. Do you know David Stein?

(The witness conferred with Mr. Foreman.)

A. Yes, I know David Stein.

Q. (By Ms. Jacoby) When did you first meet him?

(Pause.)

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(The witness conferred with Mr. Foreman.)

A. I'm not absolutely sure.

Q. (By Ms. Jacoby) Can you give us a general timeframe?

A. I believe it was after the 1984 convention.

Q. Do you know if Mr. Stein had any role or function within the '84 committee?

A. What do you mean by role or function?

Q. Was he an officer, an agent of the committee? A volunteer with the committee?

A. I don't believe so, but I don't know.

Q. Are you familiar with the sale of a computer by the 1984 committee?

(The witness conferred with Mr. Foreman.)

A. I respectfully decline to answer.

Q. (By Ms. Jacoby) Did you participate in any meetings in which the sale of a computer by the committee was discussed?

(The witness conferred with

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Mr. Foreman.)

A. I respectfully decline to answer.

Q. (By Ms. Jacoby) Would you please describe that meeting in detail telling us who attended, the date, and what was said?

A. I respectfully decline to answer.

Q. What was the purpose of the transaction by which the committee sold a computer and then leased it back?

(The witness conferred with Mr. Foreman.)

A. I respectfully decline to answer.

Q. (By Ms. Jacoby) Was the propriety of this sale/lease-back transaction discussed?

A. I respectfully decline to answer.

Q. Please tell us by whom it was discussed and what was said.

A. I respectfully decline to answer.

Q. What was the original purchase price of the computer?

A. I respectfully decline to answer.

Q. How was the sales price and the rental

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determined?

A. I respectfully decline to answer.

Q. What was the sales price and the rental?

(The witness conferred with Mr. Foreman.)

A. I respectfully decline to answer.

Q. (By Ms. Jacoby) What was the disposition of this computer after the convention or the campaign started to wind down?

A. I respectfully decline to answer.

Q. Was the computer repossessed or returned to its purchaser?

A. I respectfully decline to answer.

Q. Who within the committee would have knowledge of this transaction?

A. I respectfully decline to answer.

Q. Could you please tell us about the sale of office equipment by the committee to Stuart Karl?

(The witness conferred with Mr. Foreman.)

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A. I don't know anything about that.

Q. (By Ms. Jacoby) You have no knowledge --

A. I have no knowledge; that's correct.

Q. Who within the committee would have knowledge of that sale?

A. I don't know.

Q. Did Mr. Karl purchase any equipment used by the '84 committee or by any of the local organizations of that committee?

A. I don't know.

Q. Do you know if he purchased a Telefax machine for the committee?

A. No, I don't.

Q. Do you know if he purchased a computer for the committee?

A. No, I don't.

Q. Who within the committee would have knowledge of that information?

A. I don't know the answer to that.

Q. Have you been associated with the 1988 presidential campaign of Mr. Hart?

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A. No.

(The witness conferred with Mr. Foreman.)

Q. (By Ms. Jacoby) Are you familiar with the concept known as the cabinet program?

(The witness conferred with Mr. Foreman.)

A. I have heard of it, but I don't know anything specific about it because I wasn't involved in the campaign at all.

Q. (By Ms. Jacoby) Would you tell us everything that you have heard about that program?

A. Just that it existed and it was a fund raising vehicle.

Q. A fund raising vehicle for what entity?

A. Oh, I don't know the answer to that. I assume it was for Gary Hart's presidential campaign.

Q. Which campaign are you speaking of, his '88 or the '84 campaign?

A. I assume that it was 1988.

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Q. You have no recollection of that term during the '84 campaign?

A. No.

Q. And would you have any knowledge about who was involved in the organization of the cabinet program?

(The witness conferred with Mr. Foreman.)

A. Well, I had heard during the time I was working with Congressman Gephardt that David Stein was involved in putting together the cabinet program or whatever they called it.

Q. (By Ms. Jacoby) And how did you acquire that knowledge or that information?

A. Just on the rumor mill.

Q. Do you have any information concerning the purpose of the cabinet program?

A. I don't have specific knowledge. Our understanding was it was just to raise money for the 1988 campaign.

Q. Is there anything else you could tell us about this program?

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A. No.

Q. Are you familiar with a company known as Visual Eyes?

(The witness conferred with Mr. Foreman.)

THE WITNESS: Sorry.

A. I've heard of Visual Eyes, yes.

Q. (By Ms. Jacoby) Do you know if this company provided any services to the '84 committee?

A. I do not know that.

Q. Do you know if this committee provided any services to the 1988 committee?

A. No, because I wasn't involved in the '88 campaign.

Q. Are you familiar with a company known as Complete Products?

A. No.

Q. Are you familiar with a company known as Stratton & Associates?

A. Yes.

Q. Did that company provide any services to the '84 campaign?

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(The witness conferred with Mr. Foreman.)

A. All I know is that Mike Stratton was either a volunteer or helped with the '84 campaign, but I don't know about specific services.

Q. (By Ms. Jacoby) Okay. And what association did Mike Stratton have with Stratton Associates to your knowledge?

A. I don't know the official title, but he was obviously involved with Stratton & Associates.

Q. Are you familiar with a company known as LA Filmworks?

A. No.

Q. Do you know a company called Ray Strothers Associates?

A. Yes.

Q. Did Ray Strothers Associates provide any services to the '84 committee?

A. I am under the -- well, yes, they did. They prepared TV commercials for the campaign in '84.

Q. And it's my understanding, as you were not associated with the '88 committee, you had

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no knowledge of anything then?

A. That's correct.

Q. Do you know if any of the vendors that were just mentioned received payment by wire transfer from the committee?

A. I do not know anything about that.

Q. All right.

MR. FOREMAN: For clarification, Ms. Jacoby, when you are talking about the vendors that you just mentioned, I assume that those are the vendors that consisted of production companies you just enumerated rather than the list of vendors that --

MS. JACOBY: Yes, that would be Complete Productions, LA Filmworks, Ray Strothers Associates and Visual Eyes.

THE WITNESS: I have no knowledge.

Q. (By Ms. Jacoby) Do you recall the planning or production of a videotape during 1984 concerning before Mr. Hart's life or his campaign?

A. No, I have no knowledge of that.

Q. Were you aware of any meetings or

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discussions at which such a video project was considered?

A. I was not.

Q. Who associated with the committee would have been involved in a video production?

A. I don't know the answer to that.

Q. Do you know if, in fact, a video was ever produced?

A. I don't even know that.

Q. Is there anything you could tell us about the video, the contemplation of a video during the '84 campaign?

A. No.

Q. And you would have no knowledge as to the '88 campaign?

A. None.

Q. Do you recall a term Share Our Strength or by the acronym SOS?

A. I've heard of that organization, yes.

Q. Could you tell us in what context that term was used?

A. I believe it was a nonprofit

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organization that was set up -- and I don't know how it was set up -- but it was set up I think at Senator Hart's suggestion to provide food to drought stricken areas, primarily in Africa, I believe.

Q. Do you know who set this program up?

A. Which individual?

Q. What individuals would have been involved?

A. No, I don't.

Q. All right. And so it's your understanding that Save our Strength, or SOS, was a fund raising organization for famine relief for hunger --

A. I don't know whether it was fund raising or any kind of food raising or whatever. I don't know, but it was to help famine stricken countries, yes.

Q. And, to your knowledge, it was not directly associated with the presidential efforts of Mr. Hart?

A. No, to my knowledge it was not.

Q. Is there anything else that you can

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tell us that is pertinent to the Commission's investigation in this matter?

A. I don't think so.

MS. JACOBY: That will conclude the questions I have to pose to you today.

I would like to remind you of the confidentiality requirements for this deposition and the investigation of this subject and that our deposition is ongoing and could be resumed at a later date.

Mr. Foreman, would you like to make any statements or ask questions?

MR. FOREMAN: Yes, thank you. I have no questions to ask of the witness at this time, but I would like for purposes of clarification to make a couple of points part of this record.

First, during the course of this deposition Mr. Glaser has on various occasions asserted a privilege, and so that the record is perfectly clear, it is our intention that the privilege that he was asserting is his privilege against self-incrimination as guaranteed by the Fifth

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Amendment to the United States Constitution and there is no basis of which I am aware for his declining to answer any other question that was posed by you so that there's just no question as to exactly what the response is.

I think in the course of this deposition, just as you have made some of your questions somewhat compound in form for purposes of streamlining today's procedure, we have shortened our response, but so that the basis for our declining to answer is clearly set forth, I would like that to be noted.

Secondly, in connection with this deposition there have been various communications that have gone back and forth between myself and the Federal Election Commission since approximately the time that the original subpoena was served on Mr. Glaser back in the spring of 1988 and, in particular, I want to indicate that there was a letter which I have written to Lawrence Noble of the Federal Election Commission dated April 13th, 1988, in which I formally informed the Commission that the

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documents described in the attachment to the subpoena were not within Mr. Glaser's possession and therefore, as was indicated earlier, any nonproduction on our part today is deemed to be nothing more than the fact that we just simply don't have them.

Additionally, I would note that I had furnished to Mr. Bernstein of the Federal Election Commission by letter dated September 29th, 1988, a statement of intention that at this deposition now being concluded it was our intent to enter on Mr. Glaser's behalf his privilege against self-incrimination.

The basis for this position stems from our concern about a somewhat parallel investigation that is currently being conducted in the Central District of California which it is our understanding has not yet been completed.

In particular, there were allegations made in the Central District of California which resulted in an indictment, a ten-count indictment or more, against an individual by the name of George

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Stuart Karl in which he was charged with various offenses against the United States.

In particular the caption of that indictment itself indicates that among the crimes that Mr. Karl is alleged to have committed were violations of Title 2, United States Code, Sections 441(b) and Section 437(g).

Now, the procedural status of that case is that Mr. Karl has entered a plea of guilty to one or more counts in that indictment and, as a condition of his plea bargain, has agreed to fully and completely describe his association with every individual within the ambit of the indictment with whom he has come in contact, and it's my understanding that that specifically has included individuals who are associated with the Hart campaign.

Mr. Karl's plea has been set over for purposes of sentencing until approximately December of this year.

I state all of that as background because I think it is apparent from the initial

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subpoena and factual analysis that was presented to this witness in connection with that subpoena that it is largely the same subject matters involving the same prospective violations of Title 2 that are the subject matter both of the indictment in California and further the committee's investigation within this Matter Under Review.

The difficulty that was presented for us at that time in terms of fully discussing today any knowledge that Mr. Glaser might have within the co-extensive scope of these two investigations is due to the fact that at least as of this date the Government in California has not for our purposes clarified Mr. Glaser's status and to date has refused to commit to us that he would not be a target of that investigation.

Therefore, it is our position that to discuss his involvement with Mr. Karl or his activities that may touch upon Mr. Karl's relationship to the 1984 committee would potentially jeopardize his Fifth Amendment right against self-incrimination. Reluctantly though we have

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asserted the privilege here.

The most recent letter to the Federal Election Commission suggested ways by which this dilemma might be overcome including both postponing this deposition until the criminal investigation in California has reached a conclusion and some clarity has been presented to us as to whether or not Mr. Glaser enjoys the status of a witness or some other status, and the Commission has declined at this time to further postpone this deposition.

I should state in fairness it is not the first setting of this deposition and there have been earlier occasions when the Commission had acceded to my request that the deposition be rescheduled.

Additionally, I suggested to the Commission that this position could have been overcome if pursuant to the authority conferred by 18 United States Code, 6001, et. seq., that the Commission solicited from the Department of Justice authorization for a grant of judicial immunity which, of course, would have allowed Mr. Glaser's

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testimony at this deposition to be compelled because such a grant of judicial immunity would have been in essence co-extensive against his privilege against self-incrimination.

I do not at this juncture know whether the Commission has made an overture to the Justice Department for such authority, but it is apparent that no such immunity has been drafted or conferred. Consequently, we have appropriately asserted the privilege today.

I think the record also speaks to the fact that there were certain questions answered by this witness which in our judgment were not within the ambit of what we know about the criminal investigation of California, thereby indicating our willingness to comply with that committee's -- pardon me -- with the Commission's authority so long as such compliance does not interfere with his Constitutionally granted privileges.

Finally, I should state for the record that I am aware that in other contexts the Federal Election Commission has sought to overcome the

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assertion of Fifth Amendment privilege by a witness called within this very Matter Under Review and dealing with at least some of the same subject matters which the counsel for the Commission attempted to inquire into today, and I should note that by a written opinion dated September 20th, 1988, in the Central District of California, United States District Judge Pamela Rymer issued an opinion upholding the assertion of a privilege in this Matter Under Review by a witness by the name of David Franklyn Stein.

And I believe that completes the record I wish to make.

MS. JACOBY: Thank you. I would like to say that the Commission has recognized and does appreciate your concern regarding the assertion of the Fifth Amendment and its basis and we believe that you have fully stated that concern both in the correspondence and here.

At this time we will adjourn the deposition.

(Deposition concluded at 12:55 p.m.)

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CERTIFICATE OF WITNESS

STATE OF _____)
) ss.
COUNTY OF _____)

I, KEITH GLASER, the witness in the above deposition, do hereby acknowledge that I have read the foregoing transcript of my testimony and I state under oath that it, together with any attached Amendment to the Deposition, constitutes my sworn testimony.

I ( ) have ( ) have not made corrections on the attached Amendment to Deposition form.

_____
KEITH GLASER

SUBSCRIBED AND SWORN TO before me this _____ day of _____, 1988.

My Commission expires _____

_____
NOTARY PUBLIC
Street_____
City/State _____

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REPORTER'S CERTIFICATE

STATE OF COLORADO)
) ss.
CITY AND COUNTY OF DENVER)

I, VIOLA J. LUNDBERG, Registered Professional Reporter, Certified Shorthand Reporter, and Notary Public for the State of Colorado, duly commissioned to administer oaths, do hereby certify that, previous to the commencement of the examination, the witness was duly sworn to testify to the truth in relation to the matters in controversy between the said parties; that the said deposition was taken in stenotypy by me at the time and place aforesaid and was thereafter reduced to typewritten form by computer-aided transcription (CAT); that the foregoing is a true and correct transcript of my notes thereof;

That I am not attorney nor counsel, nor in any way connected with any attorney or counsel interested in the outcome of this action.

IN WITNESS WHEREOF, I have affixed my signature and seal this 23rd day of October, 1988.

My commission expires May 9, 1991.

Viola J. Lundberg

Viola J. Lundberg, Notary Public
227 South Lamb Lane
Golden, Colorado 80401

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Federal Election Commission
ATTN: Ms. Celia Jacoby
999 E Street, Northwest
Washington, DC 20463

Re: Deposition of DENNIS MICHAEL WALTO,
Denver CO, 4 October 1988.

Dear Ms. Jacoby:

Enclosed is the Original transcript of the above-entitled deposition, which has been read and signed by the Deponent. Changes in this transcript are shown on the list of corrections prepared by the Deponent.

Sincerely,

Edwin G. Crowley, Deposition Supervisor.

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Deposition of DENNIS MICHAEL WALTO, 4 October 1988.

CORRECTIONS TO DEPOSITION

Page	Line	Correction:
8	11	JOSH BARAN AND ASSOCIATES (SPELLED BARAN)
		ALL FURTHUR SPELLINGS OF THE SAME
10	21	SHOULD READ: "VETERANS WHO CARE".
11	6+7	SHOULD READ: PACIFIC SELECT CORPORATION
11	10	SHOULD READ: COMMITTEE
11	17	INSERT: WORKED AS PRODUCTION ASST. TO, ZIMMERMAN
		FYMAN + DIXON (PRODUCTION HOUSE) IN OCT of 1987
12	5	SHOULD READ: CHAMPION (NOT KEMP)
23	18	SHOULD READ: SCHWARTZ (NOT SWARTZ)
25	19	SAME
8	21	INSERT [AND PRIVATE COMPANIES.]

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TRANSCRIPT OF PROCEEDINGS

ORIGINAL

UNITED STATES OF AMERICA

BEFORE THE

FEDERAL ELECTION COMMISSION

IN THE MATTER UNDER REVIEW

NUMBER 2583

23043539552

DEPOSITION OF DENNIS MICHAEL WALTO

Denver, Colorado

Tuesday, October 4, 1988

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter Under Review 2583

Deposition of Dennis Michael Walto

U. S. Attorney's Office
Federal Building
1961 Stout Street
Denver, Colorado 80294

October 4, 1988
10:10 a.m.

The deposition of DENNIS MICHAEL WALTO was taken before VIOLA J. LUNDBERG, Registered Professional Reporter, Certified Shorthand Reporter, and Notary Public, State of Colorado.

APPEARANCES:

CELIA JACOBY, Attorney at Law, Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, appearing on behalf of the Federal Election Commission.

LEE D. FOREMAN, Attorney at Law, HADDON, MORGAN & FOREMAN, P.C., 1034 Logan Street, Denver, Colorado 80203, appearing on behalf of the witness.

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DENNIS MICHAEL WALTO,

called as a witness, being first duly sworn, was examined and testified as follows:

EXAMINATION

BY MS. JACOBY:

Q. Good morning. We're here to take your deposition as part of the investigation under Section 437(g) of the Federal Election Campaign Act and Title 1 of the United States Code.

The Federal Election Commission has jurisdiction to enforce these acts, and the Act requires that this proceeding and this deposition be held in confidence.

The Commission has designated this investigation as Matter Under Review No. 2583 and I'm Celia Jacoby representing the Commission.

Mr. Walto, would you state your name and address for the record?

A. Dennis Michael Walto, [redacted]

Q. Are you represented by counsel today?

A. Yes, I am.

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Q. Will you please identify your counsel?

A. Lee Foreman.

Q. I have given you a set of instructions which you returned to me as signed and having been read. Did you understand those instructions?

A. Yes, I did.

Q. Just briefly to review, I will be asking you a series of questions under oath to which you will respond.

A. Um-hum.

Q. And at any point if you do not understand the question, please stop me and I will clarify. If you find that at any point you have misspoken or you have given an incomplete answer, please stop me again and we will go off the record at that point.

A. I understand.

Q. The Commission issued a subpoena to you on March 3rd, 1988. Did you receive that subpoena?

A. Yes, I did.

Q. Could you describe to us your efforts

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to comply?

A. I contacted Lee Foreman March the -- I received the subpoena at some time after that date though, well after that date, even though I believe it was sent certified mail or registered mail. I'd never signed for it and received it a while later as I was out at that time, out of town.

But upon receiving it I contacted the Gary Hart campaign and subsequently Lee Foreman in regards to the subpoena.

Q. And you did produce certain documents in response to the subpoena. Do you have any further documents that would be responsive to the subpoena?

A. At this point, no.

Q. Do you know of any other documents that you may not yourself hold that would be responsive to the subpoena?

MR. FOREMAN: I think -- excuse me, counsel. I think we take the position that the subpoena called for the production of documents in his possession, and just so the record is perfectly clear, there is another agency that has been involved

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in the somewhat parallel investigation in this matter, and that is the Federal Bureau of Investigation, and sometime after the subpoena for the production of documents was served on Mr. Walto, all documents in his possession which are within the ambit of the subpoena that the FEC issued were produced to the FBI under certain limited immunity agreements that attended that particular production.

Now, there is correspondence that I think the FEC is aware of between myself, the FEC, and the United States Attorney's Office for the Central District in California whereby it was arranged for the documents produced to the FBI to be furnished by that agency to the Federal Election Commission.

And it is my understanding that that production was protected by the agreement under which they were produced to the FBI in the first place.

Now, you, of course, are not in a position --

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MS. JACOBY: I cannot comment whether we are subject to that agreement because it is limited and we do acknowledge that certain documents were produced through that route.

What I am clarifying is if there are any other documents to Mr. Walto's knowledge that would be responsive but which are not in his personal possession and control.

MR. FOREMAN: Well, it is limited --

MS. JACOBY: But I'm asking if there are any other documents existing.

A. I don't know.

Q. (By Ms. Jacoby) I could not require you to produce them. I'm not suggesting that. I'm just asking you were there other documents existing.

MR. FOREMAN: All I was really trying to do for purposes of the record --

A. I don't know.

MR. FOREMAN: -- since the way you formed the question was that he had produced certain documents is to clarify it because there are

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privilege issues which we are aware of that surround that.

I didn't want to be in a position where there is any misunderstanding that there has been some direct act of unprotected production that might compromise any position we may or may not take later in the course of these proceedings.

MS. JACOBY: And again we want to keep the record as clear as we can. Again I was not asking that you would have to produce documents that someone else has control of. I was merely asking if --

A. Yes, sure, there's documents, right. I mean --

Q. (By Ms. Jacoby) That would have been responsive to the subpoena had you controlled them?

A. Oh, no, I'm sorry. I misunderstood the question. The response to that is no.

Q. What is your marital status at this time?

A. Single.

Q. And can you describe your educational

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background for us?

A. I currently hold a bachelor of arts degree. I believe it's a bachelor of arts degree from the State University of New York, Empire State College, awarded in January of 1988.

Q. Have you had any further training?

A. No.

Q. What is your occupation at this time?

A. I'm an independent consultant to various political and nonprofit organizations. I'm currently employed by Josh ~~Baron~~ BARAN & Associates.

Q. And how long have you been doing this job?

A. Josh ~~Baron~~ BARAN & Associates' tenure has been approximately nine weeks. I have been an independent consultant for the past four years -- four and a half years.

Q. You had not been on the payroll of any company during that period?

A. Yes, I have, various nonprofit organizations and political campaigns. Do you want me to list them?

[INSERT] AND PRIVATE COMPANIES

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Q. Yes. Let's go back in time. Would you list them from Josh ~~Baron~~ BARAN back?

A. Josh ~~Baron~~ BARAN --

(Mr. Foreman conferred with the witness.)

A. Let's see. Josh ~~Baron~~ BARAN & Associates. Previous to that would be Fonda Films. Previous to that is the Democratic National Committee.

Do you want dates?

Q. (By Ms. Jacoby) To the extent that --

A. Josh ~~Baron~~ BARAN & Associates starting in August of '88, one week in late July with Fonda Films, approximately three weeks in July of 1988 with the Democratic National Committee, Jesse Jackson for President Campaign from April until May of 1988, Friends of Gary Hart, 1988, from December until -- December of '87 until March of 1988.

Q. Would you continue?

A. Yeah, sure. Vote Environment in October of 1987, Josh ~~Baron~~ BARAN & Associates in August and September of 1987, Friends of Gary Hart 1988, April-May, 1987.

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(Mr. Foreman conferred with the witness.

A. Prior to that date I respectfully will not answer or provide that information on the grounds that it may incriminate me.

Q. (By Ms. Jacoby) Prior to the date of May, 1987, is this --

A. No, prior to the date of -- I believe it's March, 1987.

Q. You have described various politically related consultant work. Have you had any commercial employment?

A. Yes.

Q. Would you describe that employment for us?

A. Sure. Most recently and currently, Josh ~~Baron~~ BARAN & Associates, a public relations firm. I am on contract to Josh ~~Baron~~ BARAN and working for Universal Pictures in a consultant capacity.

Prior to that I was the event producer of an event called "Veterans Who Care" for Fonda Films. That was in Waterbury, Connecticut.

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Prior to that I was a consultant with the Democratic National Committee not on policy or political matters, but on staging logistics for the Democratic National Convention, and let's see.

I've also worked in 1985 as a production assistant to an organization called ~~Pro~~ PACIFIC Select ~~Peace~~ Corporation on music videos. Is that --

Q. Has that gap in time -- apparently you said you worked for the Democratic National ~~Campaign~~ COMMITTEE staging -- that's the July '88 convention?

A. That's correct.

Q. And you said you worked for a group in '85?

A. Right.

Q. There is some time in between. Would you fill that for us?

(INSERT) See SHEET A. I worked with an organization called U. S. for Africa, Hands Across America, going backwards in April and May of 1986. I worked for an organization called the Great Peace March which was actually Pro Peace, P-r-o P-e-a-c-e, Incorporated, from April of 1985 until February -- actually March

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of 1986.

Previous to that, which would be December and January February of 1984 and then '85 subsequently, I worked for two organizations, one the CAMPAIGN ~~Kemp~~ for Economic Demoracy in Los Angeles and SANE, a committee for a sane nuclear world also in Los Angeles, California.

Q. We got up to March of 1986 and we talked about July 1988. Can you fill in the interim period?

A. From the end actually -- actually June of 1986, at that point I respectfully refuse to answer the question.

Q. If I could be clear, the time period you are not going to answer is from June of 1986 until your employment in July of 1988 or --

A. Until May of 1988 -- oh, actually, I'm sorry -- until March of 1987.

Q. Okay.

A. Is that clear?

Q. I just want to make sure we understand.

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Do you know a gentleman known as Stuart Karl or George Stuart Karl?

A. I respectfully refuse to answer the question on the grounds it may incriminate me.

Q. So that we all understand, I am not authorized to compel you to give testimony or evidence as to which you have asserted a Fifth Amendment privilege on self-incrimination nor am I authorized to grant immunity.

A. I understand.

Q. Each question I ask of you will be with the understanding that if you wish to assert your privilege, you may so simply state for the record.

If you do answer, you will be answering voluntarily; is that correct?

A. I understand.

Q. When did you first meet Stuart Karl?

A. I respectfully refuse to answer that question.

Q. Would you describe all circumstances surrounding your meeting him including who introduced

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you?

A. I respectfully refuse to answer that question.

Q. Were you employed by a company called Karl-Lorimar Home Video?

A. I respectfully refuse to answer that question.

Q. Could you tell us the dates of your employment with Karl-Lorimar Home Video?

A. I respectfully refuse to answer that question.

MS. JACOBY: Off the record for a moment.

(Discussion off the record.)

MS. JACOBY: Back on the record.

Off the record we discussed the form of the questions, and Mr. Foreman has no objection to the asking of compound questions at this time.

Q. (By Ms. Jacoby) Would you tell us your job title and the duties of that job at Karl-Lorimar?

A. I respectfully decline to answer that

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question.

Q. Would you tell us your supervisor at that position?

A. I respectfully decline to answer that question.

Q. Please describe all the travel requirements of this job including where you went, the dates and the functions you served while traveling.

A. I respectly decline to answer that question.

Q. Please tell us how all travel expenses were handled including what travel agency was used, who had to approve your travel, and how that travel was paid for.

A. I respectfully decline to answer that question.

Q. What were the required number of hours that you worked both on a daily and weekly basis for Karl-Lorimar?

A. I respectfully decline to answer that question.

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Q. Prior to your employment with Karl-Lorimar did you have any training or experience in the fields of video production or market analysis?

A. I respectfully decline to answer that question.

Q. What training did you receive at Karl-Lorimar to fulfill your duties?

A. I respectfully decline to answer that question.

Q. Would you please describe all of your relevant training and experience for the position you held at Karl-Lorimar?

A. I respectfully decline to answer that question.

Q. Please name each school you visited on behalf of Karl-Lorimar including the cities that you visited, the names of the schools, the types of reports and functions that you served, and to whom you submitted those reports.

A. I respectfully decline to answer that question.

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Q. During the time you were employed by Karl-Lorimar did your job or title change?

A. I respectfully decline to answer that question.

Q. Were you ever a production assistant at Karl-Lorimar?

A. I respectfully decline to answer that question.

Q. If your job title did change, did your duties remain the same or change, and if they did, how?

A. I respectfully decline to answer that question.

Q. Did you have any travel obligations in this position?

A. I respectfully decline to answer that question.

Q. Would you tell us where you traveled, how that travel was arranged and what services you provided while traveling?

A. I respectfully decline to answer that question.

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Q. Please describe for us all the salary and benefits you received at Karl-Lorimar.

A. I respectfully decline to answer that question.

Q. When you were traveling, did you receive an advance or per diem?

A. I respectfully decline to answer that question.

Q. What type of documentation did you have to submit to receive an advance or per diem, and who would have approved that advance?

A. I respectfully decline to answer that question.

Q. Did you ever receive an advance on your salary?

A. I respectfully decline to answer that question.

Q. Was the advance of $500 repaid to the company?

A. I respectfully decline to answer that question.

Q. Did the company provide you an

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automobile during your work there?

A. I respectfully decline to answer that question.

Q. Did you have the use of a Ford Bronco and later a Chevrolet Cavalier?

A. I respectfully decline to answer that question.

Q. Did your use of a company vehicle or other vehicle continue after your employment ceased?

A. I respectfully decline to answer that question.

Q. On what date did you terminate your employment with Karl-Lorimar?

A. I respectfully decline to answer that question.

Q. Were you ever employed by or associated with Complete Products?

A. I respectfully decline to answer that question.

Q. In what capacity and who was your supervisor at Complete Products?

A. I respectfully decline to answer that

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question.

Q. Please tell us what salary and the benefits you received.

A. I respectfully decline to answer that question.

Q. What was your required work schedule both on a daily and weekly basis?

A. I respectfully decline to answer that question.

Q. What were your dates of employment at Complete Products?

A. I respectfully decline to answer that question.

Q. Did you do any traveling in this position?

A. I respectfully decline to answer that question.

Q. Where did you travel, on what dates, and what services did you perform while traveling?

A. I respectfully decline to answer that question.

Q. Did you receive any income or other

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benefits from Complete Products?

A. I respectfully decline to answer that question.

Q. If you did, will you tell us what those benefits were, the amount and why such sums were given to you?

A. I respectfully decline to answer that question.

Q. Were you ever employed by or associated with Stratton & Associates?

(Witness conferred with Mr. Foreman.)

A. I respectfully decline to answer that question.

Q. (By Ms. Jacoby) Please tell us what job title you had, your supervisor's name and the required work hours at Stratton & Associates.

A. I respectfully decline to answer that question.

Q. What dates were you employed by Stratton & Associates?

A. I respectfully decline to answer that question.

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Q. Did you do any traveling in this position?

A. I respectfully decline to answer that question.

Q. With regards to all travel would you tell us the dates, the places, and what services you performed while traveling?

A. I respectfully decline to answer that question.

Q. Did you receive any income or other benefits from Stratton & Associates?

A. I respectfully decline to answer that question.

Q. Please tell us the amount, what those benefits were and why such sums were given to you.

A. I respectfully decline to answer that question.

Q. All right. You indicated earlier that you had been involved with the 1984 campaign of Senator Gary Hart; is that right?

A. I don't know.

MR. FOREMAN: But you were.

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THE WITNESS: Yes.

A. Yes, I was associated with the campaign in 1984.

Q. (By Ms. Jacoby) Would you tell us what services you rendered to that campaign?

(Mr. Foreman conferred with the witness.)

A. I first became involved in the 1984 Hart campaign known as Americans with Hart in the early fall of 1983.

I was currently a student at the State University of New York at Oswego. I initiated contact with the New York State office to which I got no reply. I then contacted the New Hampshire State campaign unsolicited and basically offered my services.

They indicated to me -- "they" being the person I spoke to was Eric ~~Swartz~~ SCHWARTZ -- that they were coordinating students and volunteers to come up from various universities to run a canvasing operation in New Hampshire. I volunteered the use of my car and myself, and on two occasions in the

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fall of 1983 I drove to New Hampshire to partake in the canvasing activities.

During that time period I also started an unofficial Americans with Hart chapter -- actually it was a Gary Hart for President Chapter on the State University of New York Oswego campus.

We performed no real functions. We did hand out some literature. I put together a fund raiser in I believe October -- no, it was November -- of 1983 which was a beer blast, fund raiser, of which I collected the funds and then sent them in to the New Hampshire office. I believe the sum was $250 to the New Hampshire office of Americans with Hart.

I made the decision in December of that year, 1983, to leave school, not under an internship program, just leave school and devote full time to the Hart campaign in New Hampshire.

I arrived there -- I believe the date was January 3rd -- I believe so -- and remained there through the New Hampshire primary which I don't know the date any more, but during that time utilized my car and drove around the state

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performing various activities on the Hart campaign's behalf.

Q. All these services were rendered in a voluntary capacity?

A. Very much so.

Q. Were you ever on the payroll or subsistence with the campaign?

A. At that point in the Hart campaign through New Hampshire, no, I was not.

Q. And thereafter were you?

A. I respectfully decline to answer that question.

Q. Could you tell us as a volunteer and then later in whatever capacity you served to whom did you report to?

(Mr. Foreman conferred with the witness.)

A. In New Hampshire I was originally under the direction of Eric ~~Swartz~~ SCHWARTZ, who was running the internship type campaign -- not campaign but program for the campaign.

I then worked in association with Sue

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Casey, who was the New Hampshire state scheduler, and did advance type work which at that point still I reported to Sue Casey, through the New Hampshire primary.

Q. And you spoke of advance work. Would you tell us what advance work encompassed?

A. In New Hampshire advance work consisted of literature distribution surrounding particular events, town meetings, organizing forums for a candidate to speak, arranging for press interviews, once they had already been established, not going to the media myself, but acting as a middle person in doing the actual logistical preparations for the interview.

It meant acquiring sound systems which at that point were very small and arranging for a camera or television coverage on-site, all site logistical preparations.

Q. And the advance work was similar in other states? You had said this was in New Hampshire, but if you went to another state, did you do similar functions?

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A. I respectfully decline to answer that question.

Q. Did you attend the 1984 Democratic convention?

A. I respectfully decline to answer that question.

Q. Who on the committee staff did attend the convention to your knowledge?

A. I respectfully decline to answer that question.

Q. What transportation was made available to the committee staff at the convention?

A. I respectfully decline to answer that question.

Q. Do you know if rental vehicles were provided to the committee staffers?

A. I respectfully decline to answer that question.

Q. Who was in charge of transportation services at the convention for the staff?

A. I respectfully decline to answer that question.

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Q. Who was in charge of transportation services for Mr. Hart?

A. I respectfully decline to answer that question.

Q. Who was in charge of staff workers generally at the convention?

A. I respectfully decline to answer that question.

Q. During the 1984 campaign could you characterize what contacts you had with Mr. Hart personally?

A. I respectfully decline to answer that question.

Q. Would you estimate the number of trips or events at which you worked as the advance person?

A. I respectfully decline to answer that question.

Q. What amount of time did you spend with the candidate, either to talk with him, to work on an event, or to travel?

A. I respectfully decline to answer that

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question.

Q. Were you associated with the 1988 presidential campaign of Mr. Hart?

A. I respectfully decline to answer that question.

Q. When were you first associated with that campaign?

A. I respectfully decline to answer that question.

Q. When did your knowledge was the 1988 committee formed?

A. I respectfully --

(Witness conferred with Mr. Foreman.)

A. -- decline -- I respectfully decline to answer that question.

Q. (By Ms. Jacoby) Who was involved in the formation of the '88 committee?

A. I respectfully decline to answer that question.

Q. Did you attend any meetings in which the formation of the '88 committee was considered or the program for that committee?

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A. I respectfully decline to answer that question.

Q. With respect to each meeting you did attend will you please tell us the date of the meeting, who attended, and the substance of all the discussions?

A. I respectfully decline to answer that question.

Q. Are you aware of any meetings at which the formation of the '88 committee was considered?

A. I respectfully decline to answer that question.

Q. With respect to those meetings would you tell us the date, who attended, and the gist of all discussions?

A. I respectfully decline to answer that question.

Q. During its exploratory phase could you tell us what activities the '88 campaign was engaged in?

A. I respectfully decline to answer that

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question.

Q. Would you please describe each of those activities and give us a timeframe?

A. I respectfully decline to answer that question.

Q. How were funds raised by the '88 committee?

A. I respectfully decline to answer that question.

Q. Is there anything else you can tell us about the inception of the '88 committee?

A. I respectfully decline to answer that question.

Q. During the 1988 presidential campaign efforts did you work as an advance person for Mr. Hart?

A. I respectfully decline to answer that question.

Q. Was the pattern of advance work during the '88 campaign efforts similar to that in the 1984 campaign?

A. I respectfully decline to answer that

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question.

Q. How was it determined which cities an advance worker would visit?

A. I respectfully decline to answer that question.

Q. On what date did you start working for the '88 campaign and to whom did you report?

A. I respectfully decline to answer that question.

Q. As an advance person, what numbers of hours were you expected to work on a daily or weekly basis?

A. I respectfully decline to answer that question.

Q. What contacts did you have with Mr. Hart after the 1984 campaign terminated?

A. I respectfully decline to answer that question.

Q. Did you have any contacts with his staff after the '84 campaign ended?

A. I respectfully decline to answer that question.

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Q. Would you please describe each contact you had and the frequency and with whom?

A. I respectfully decline to answer that question.

Q. I would like to give you a document which consists of three pages. The reporter is to mark it as Exhibit 1. Would you please look at this document for me?

(The witness conferred with Mr. Foreman.)

Q. (By Ms. Jacoby) Do you recognize this document?

A. I respectfully decline to answer that question.

MS. JACOBY: I would like the record to show that this is a three-page document which consists of calendars for the months of July, September and October, 1986, and have the notation Dennis Walto on them -- on the July '86 calendar. These calendars indicate that various trips apparently occurred.

Q. (By Ms. Jacoby) Can you tell me the

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purpose of each trip by day and place? Starting July '86, could you tell us about the trip on the 30th of June to July 2 to Washington, D.C.; on July 9 through 12th to Denver, Colorado; on July 13-14, Buffalo, New York; on 23 to 26 July, to Chicago, Illinois -- excuse me -- 23 to 28 of July to Chicago, Illinois; and then 31 July to August 2, New Orleans?

A. I respectfully decline to answer that question.

Q. If you would look at page 2, again it's a calendar indicating trips. Would you please tell me the purpose of each of these trips going 3-8 September to Orlando and what the Orlando event was; the 10 through 15 September, possibly in Colorado; 18 through 20 September in Connecticut, and what the Connecticut event was -- it's questionable about a trip on the other dates, the 21st to Indiana and possibly on the 22nd and 23rd to Washington, D.C. -- and a trip the 24th through the 27th of September to Casper, Wyoming, and an event there; and, finally, a trip on the 28th and 29th of September to Washington, D.C.? Would you describe the purpose of

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each trip and what event occurred?

A. I respectfully decline to answer that question.

Q. On the third page I have similar questions regarding each of these trips which are designated 5 through 7 October in Seattle; 8 September (sic) in Portland, Oregon; 9 through 11 October in California; 13th through the 16th of October in Boston; the 17th through the 19th in New Jersey; the 20th and the 21st in North Carolina; the 22nd through the 24th in Mississippi.

Please tell us the purpose of each trip, what each event indicated was, and how you traveled.

A. I respectfully decline to answer that question.

MR. FOREMAN: Off the record. That's going to be -- off the record, that's going to be marked as a deposition exhibit?

MS. JACOBY: Exhibit 1.

(Walto Exhibit 1 was marked for identification.)

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MS. JACOBY: I hand another document to the reporter which will be marked as Exhibit 2.

Q. (By Ms. Jacoby) I would like you to review this. It's a three-page document.

(Walto Exhibit 2 was marked for identification.)

Q. (By Ms. Jacoby) Do you recognize this document, Mr. Walto?

A. I respectfully decline to answer that question.

Q. Did you write this document?

A. I respectfully decline to answer that question.

Q. Can you identify that document for the record, please -- this is a three-page memo dated August 15, 1986, from Dennis Walto regarding Chicago slash Boston slash New Orleans assessment, and the memo was apparently written to Stuart Karl, Bill Dixon and Billy Shore.

Would you please identify Stuart Karl for us?

A. I respectfully decline to answer that

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question.

Q. Will you please identify Bill Dixon?

A. I respectfully decline to answer that question.

Q. Would you identify Billy Shore?

A. I respectfully decline to answer that question.

Q. Were Mr. Shore or Mr. Dixon associated with the 1988 presidential campaign of Gary Hart?

A. I respectfully decline to answer that question.

Q. As you look at this document, it indicates an assessment of Gary Hart's recent speaking engagements in Chicago, Buffalo and New Orleans.

Would you refer again to Exhibit 1 for me? You'll note that this calendar shows that you apparently took trips to Buffalo, Chicago and New Orleans.

Does this memo refer to those trips?

A. I respectfully decline to answer that question.

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Q. What was the role of each of these recipients in the 1988 campaign for Mr. Hart?

A. I respectfully decline to answer that question.

Q. During the month of August, 1986, were you not employed by Karl-Lorimar Video?

A. I respectfully decline to answer that question.

Q. How were you able to coincide travel for the campaign with travel with your work for Karl-Lorimar Video?

A. I respectfully decline to answer that question.

Q. A review of this memo, would you not agree, indicates the trips indicated on Exhibit 1, the July '86 calendar, were co-political?

A. I respectfully decline to answer that question.

Q. Did any of these trips also have the purpose of providing benefits to Karl-Lorimar Video?

A. I respectfully decline to answer that

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question.

Q. Did you ever call Stuart Karl or his office to schedule or obtain transportation for Mr. Hart or anyone on his campaign staff?

A. I respectfully decline to answer that question.

Q. Do you recall making a phone call to Stuart Karl or his office during October 1986?

A. I respectfully decline to answer that question.

Q. I would like you to review a document which will be Exhibit 3. I would particularly like to direct your attention to lines 6 and 10.

MR. FOREMAN: Are you counting the numbers down from the top?

MS. JACOBY: From the top.

(Walto Exhibit 3 was marked for identification.)

Q. (By Ms. Jacoby) Exhibit 3 is a one-page document dated October 14, 1986, and depicts the phone messages received by a gentleman designated as SK.

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At entry 6 it's indicated that a Dennis Walto made a phone call and left a message which reads, "Doesn't think he needs jet now."

Do you recall making that phone call?

A. I respectfully decline to answer that question.

Q. Do you recognize the number 213, 827-5695 as being your telephone number?

A. I respectfully decline to answer that question.

Q. At entry 10 it is indicated that Dennis Walto made a phone call leaving a message which states, "Reason we did not need the plane is the Senate will be in session Thursday."

Do you recall making that phone call?

A. I respectfully decline to answer that question.

Q. Would you explain all the circumstances underlying the making of these phone calls?

A. I respectfully decline to answer that question.

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Q. Did Mr. Karl provide air transportation to the committee or to Mr. Hart?

A. I respectfully decline to answer that question.

Q. Would you tell us all circumstances surrounding each time, to your knowledge, such transportation was provided?

A. I respectfully decline to answer that question.

Q. During the progress of the 1988 campaign how often did you see Mr. Hart?

A. I respectfully decline to answer that question.

Q. Did you ever have dinner with him?

A. I respectfully decline to answer that question.

Q. Did you ever attend movies with Mr. Hart?

A. I respectfully decline to answer that question.

Q. Could you tell us in any other meetings or phone calls or travels that you had with

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Mr. Hart?

A. I respectfully decline to answer that question.

Q. Would you please characterize for us the relationship between Mr. Hart and Mr. Karl?

A. I respectfully decline to answer that question.

Q. Would you please characterize Mr. Karl's role in the 1988 campaign?

A. I respectfully decline to answer that question.

Q. You have said you had been employed as a political consultant. What services did you render in that capacity to the '88 campaign of Mr. Hart?

(The witness conferred with Mr. Foreman.)

A. Can I let the record show that I have identified myself as an independent consultant who has been a consultant to political and nonprofit organizations as well as studios and various music video projects?

With that I would respectfully decline

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to answer that question.

MR. FOREMAN: Off the record.

MS. JACOBY: Yes, let's go off the record.

(Discussion off the record.)

MS. JACOBY: On the record. Off the record we discussed the terminology that Mr. Walto originally used to characterize his employment, and I believe I misspoke by saying you were a political consultant whereas I believe you identified yourself as an independent consultant to political campaigns.

Q. (By Ms. Jacoby) As an independent consultant to the 1988 presidential campaign of Mr. Hart what services did you render?

A. I respectfully decline to answer that question.

Q. Would you tell us what payment or other compensation you received in that capacity from the campaign?

A. I respectfully decline to answer that question.

Q. And during what time period had you

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served the campaign in this manner?

A. I respectfully decline to answer that question.

Q. If you were terminated in November, 1986, by Karl-Lorimar Video and not employed by the committee until April of '87, what was your source of income during the interim?

A. I respectfully decline to answer that question.

Q. I would like you to review another document with me. This will be Exhibit 4.

(Walto Exhibit 4 was marked for identification.)

Q. (By Ms. Jacoby) Do you recognize this document?

A. I respectfully decline to answer that question.

Q. Did you write this document?

A. I respectfully decline to answer that question.

MS. JACOBY: I would like the record to show that Exhibit 4 is a one-page memorandum dated

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17 February 1987 from Walto to Sue, Greg, Shore and Emmo -- that's E-m-m-o -- regarding advance in April slash March.

At the time you wrote this memo what was your relationship to the committee?

A. I respectfully decline to answer that question.

Q. What was your relationship to Mr. Karl at this time?

A. I respectfully decline to answer that question.

Q. Could you explain why you wrote in quotes, "my expenses and travel present no burden to the campaign"?

A. I respectfully decline to answer that question.

Q. Why would your travel pose no burden to the campaign?

A. I respectfully decline to answer that question.

Q. What trips and expenses were referred to in this sentence?

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A. I respectfully decline to answer that question.

Q. By whom would those expenses have been paid?

A. I respectfully decline to answer that question.

Q. Would you please describe for us all dealings you had with Mr. Karl after you left employment with Karl-Lorimar Video or any company associated with him?

A. I respectfully decline to answer that question.

Q. Are you familiar with the term prospect or prospecting?

A. I respectfully decline to answer that question.

Q. Would you tell us what that term means?

A. I respectfully decline to answer that question.

Q. Are you familiar with the concept known as the cabinet program?

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A. I respectfully decline to answer that question.

Q. Did you attend any meetings or discussions at which that concept or the term cabinet program were mentioned?

A. I respectfully decline to answer that question.

Q. Please describe each such meeting telling us who attended, the dates and a summary of all discussions.

A. I respectfully decline to answer that question.

Q. What was the purpose of the cabinet program?

A. I respectfully decline to answer that question.

Q. How was it organized?

A. I respectfully decline to answer that question.

Q. What was the relationship of the cabinet program to the 1984 presidential campaign of Mr. Hart?

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A. I respectfully decline to answer that question.

Q. What was the relationship of the cabinet program to the 1988 committee?

A. I respectfully decline to answer that question -- excuse me a second.

(The witness conferred with Mr. Foreman.)

THE WITNESS: Thank you.

Q. (By Ms. Jacoby) Is there anything else you can tell us about the cabinet program?

A. I respectfully decline to answer that question.

Q. Are you familiar with a company known as Visual Eyes?

A. I respectfully decline to answer that question.

Q. What is the principal business of Visual Eyes?

A. I respectfully decline to answer that question.

Q. What services if any did it provide to

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the 1984 Hart committee?

A. I respectfully decline to answer that question.

Q. What services did it provide to the 1988 Hart committee?

A. I respectfully decline to answer that question.

Q. Who at the committee was the point of contact between this vendor?

A. I respectfully decline to answer that question.

Q. What payments were made to the vendor by the committee?

A. I respectfully decline to answer that question.

Q. What payments were made on behalf of the committee to this vendor?

A. I respectfully decline to answer that question.

Q. Who made those payments, in what amount, and would you tell us how you acquired the information?

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A. I respectfully decline to answer that question.

Q. Do you know if this vendor received any payment by wire or any other interbank transfer?

A. I respectfully decline to answer that question.

Q. Would you please describe all circumstances surrounding any such wire transfer?

A. I respectfully decline to answer that question.

Q. Are you familiar with a company known as Complete Products?

A. I respectfully decline to answer that question.

Q. What was its principal business?

A. I respectfully decline to answer that question.

Q. What services did it provide to the 1984 Hart committee?

A. I respectfully decline to answer that question.

Q. What services did it provide to the

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1988 Hart committee?

A. I respectfully decline to answer that question.

Q. Who within the committee was the point of contact with this vendor?

A. I respectfully decline to answer that question.

Q. What paymnts were made to the vendor by this committee?

A. I respectfully decline to answer that question.

Q. What payments were made to Complete Products by anyone else on behalf of the committee?

A. I respectfully decline to answer that question.

Q. By whom and what amounts were such payments made?

A. I respectfully decline to answer that question.

Q. Do you know if this vendor received any payment by wire or other direct depository method?

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A. I respectfully decline to answer that question.

Q. Will you please describe all circumstances surrounding such wire transfer?

A. I respectfully decline to answer that question.

Q. Are you familiar with a company known as LA Filmworks?

A. I respectfully decline to answer that question.

Q. What is its principal business?

A. I respectfully decline to answer that question.

Q. What services did it provide to the '84 Hart committee?

A. I respectfully decline to answer that question.

Q. What services did it provide to the 1988 Hart committee?

A. I respectfully decline to answer that question.

Q. Who at the committee was the point of

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contact with the vendor?

A. I respectfully decline to answer that question.

Q. What payments were made to that vendor by the committee?

A. I respectfully deny -- decline to answer this question.

Q. What payments were made on behalf of the committee by anyone else?

A. I respectfully decline to answer that question.

Q. By whom were such payments made and what amounts?

A. I respectfully decline to answer that question.

Q. Do you know if this vendor received any payment by wire or other direct depository method?

A. I respectfully decline to answer that question.

Q. Will you please describe all circumstances surrounding such payment?

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A. I respectfully decline to answer that question.

Q. Are you familiar with a company known Ray Strothers Associates?

A. I respectfully decline to answer that question.

Q. What is its principal business?

A. I respectfully decline to answer that question.

Q. What services did it provide to the 1984 Hart committee?

(The witness conferred with Mr. Foreman.)

A. To the best of my knowledge, in the Americans with Hart effort of 1984 in New Hampshire Ray Strothers was the media consultant to the campaign and cut a couple of television spots that were aired in New Hampshire for that primary.

Q. (By Ms. Jacoby) And did Ray Strothers provide any services to the '88 Hart committee?

A. I respectfully decline to answer that question.

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Q. Would you tell us what the nature of those services was?

A. I respectfully decline to answer that question.

Q. Who on the committee to your knowledge was point of contact with Mr. Strothers during '84 and '88?

A. In the New Hampshire campaign of 1984 I was unaware of who the main contact was with Ray Strothers. I had heard the name on several occasions.

And the second part of the question I would respectfully decline to answer.

Q. To your knowledge, what payments were made by the committee to Mr. Strothers for his '84 efforts?

A. I do not know.

Q. And to your knowledge, what payments were made by the '88 committee to Mr. Strothers?

A. I respectfully decline to answer that question.

Q. To your knowledge, were any payments

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made to Ray Strothers Associates on behalf of the committee by anyone else?

A. I respectfully decline to answer that question.

Q. To the extent that you do know, what payments were made and in what amounts and by whom?

A. I respectfully decline to answer that question.

Q. Do you know if Ray Strothers Associates received a payment by wire or other bank transfer?

A. I respectfully decline to answer that question.

Q. Were you ever associated with or been employed by Complete Products?

A. I respectfully decline to answer that question.

Q. Were you ever associated with or employed by Stratton & Associates?

A. I respectfully decline to answer that question.

(The witness conferred with

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Mr. Foreman.)

A. In response to your previous question, I was never employed by Stratton Associates in any year under any circumstances.

Q. (By Ms. Jacoby) I also asked if you were associated with. In a sense were you an independent contractor with them or did you have any other dealings with them?

(The witness conferred with Mr. Foreman.)

MR. FOREMAN: Ms. Jacoby, let me ask a question for clarification: Do I understand the thrust of your question goes to whether or not Mr. Walto has any business relationship with Stratton & Associates?

The reason for my question is that he knows Mike Stratton on a personal level, but it seems to me the scope of your inquiry is more likely to be the business aspects and I just --

MS. JACOBY: Yes, it is related to the professional aspects, and to that extent we want to find out what compensation or other benefits you have

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received through those organizations.

(The witness conferred with Mr. Foreman.)

THE WITNESS: Okay.

A. I respectfully decline to answer that question.

MS. JACOBY: I think there's a little confusion. Would you be able to read back the question?

(The question was read by the reporter as follows:

Question: "I also asked if you were associated with. In a sense were you an independent contractor with them or did you have any other dealings with them?")

MR. FOREMAN: I'll object to the first part of the question as the term associated being too broad, but you can answer the second part as to whether you were employed by Stratton & Associates.

A. The answer is no, I was not.

Q. (By Ms. Jacoby) Did you have any

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professional relationship with Stratton & Associates?

(The witness conferred with Mr. Foreman.)

A. I respectfully decline to answer that question.

Q. (By Ms. Jacoby) Were you ever employed by or have other professional dealings with LA Filmworks?

A. I respectfully decline to answer that question.

Q. Were you ever employed by or did you have professional dealings with Ray Strothers Associates?

A. I respectfully decline to answer that question.

Q. Do you recall the planning or production of a videotape concerning Mr. Hart, his life, or his campaign during 1984?

A. I respectfully decline to answer that question.

Q. Were you involved in any discussions about such videotape?

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A. I respectfully decline to answer that question.

Q. With regard to each such discussion would you tell us who participated, the date, and what was said?

A. I respectfully decline to answer that question.

Q. Who would have been responsible for or involved in such video production in the 1984 campaign?

A. I respectfully decline to answer that question.

Q. Was the production of a videotape in connection with the 1988 campaign considered?

A. I respectfully decline to answer that question.

Q. Did you attend any meetings at which such a project, a videotape, was considered?

A. I respectfully decline to answer that question.

Q. With regard to each such meeting will you tell us who attended, the date, and what was

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said?

A. I respectfully decline to answer that question.

Q. Did you participate in any video project for the '88 campaign?

A. I respectfully decline to answer that question.

Q. Did you review a script for such videotape?

A. I respectfully decline to answer that question.

Q. Did anyone else, to your knowledge, review the script?

A. I respectfully decline to answer that question.

Q. Who wrote the script for the videotape?

A. I respectfully decline to answer that question.

Q. Who associated with the committee was involved in the production of the videotape?

A. I respectfully decline to answer that

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question.

Q. Would you tell me if any of these persons were involved and, if so, what their involvement was? McKay Daines?

A. I respectfully decline to answer that question.

Q. Beth Smith?

A. I respectfully decline to answer that question.

Q. Douglas Rosen?

A. Pardon?

Q. Douglas Rosen?

A. I respectfully decline to answer that question.

Q. Do you know what commercial companies or other vendors were involved in the production of the videotape?

A. I respectfully decline to answer that question.

Q. Could you tell us if LA Filmworks was involved?

A. I respectfully decline to answer that

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question.

Q. Was Complete Products involved in this videotape?

A. I respectfully decline to answer that question.

Q. Was Visual Eyes involved in this production?

A. I respectfully decline to answer that question.

Q. Was a videotape produced in any manner, whether completed or not?

A. I respectfully decline to answer that question.

Q. What was the anticipated use of the videotape?

A. I respectfully decline to answer that question.

Q. Would the tape have been sold?

A. I respectfully decline to answer that question.

Q. How was the tape to be distributed?

A. I respectfully decline to answer that

2304350401 5

question.

Q. What use of the proceeds of the tape was contemplated?

A. I respectfully decline to answer that question.

Q. How was the project to be financed?

A. I respectfully decline to answer that question.

Q. Was the project abandoned?

A. I respectfully decline to answer that question.

Q. If it was abandoned, why?

A. I respectfully decline to answer that question.

Q. Who else, to your knowledge, was involved in the planning, production, or anticipated distribution of this videotape?

A. I respectfully decline to answer that question.

Q. What use was made of any completed portion?

A. I respectfully decline to answer that

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question.

Q. Is there anything else you can tell us about the creation or development of the videotape for the '88 campaign?

A. I respectfully decline to answer that question.

Q. Do you recall the term Save Our Strength?

(Pause.)

A. Say it again?

Q. (By Ms. Jacoby) Save our Strength or, as an acronym, SOS.

(The witness conferred with Mr. Foreman.)

A. The SOS, Share Our Strength, is a project started by, I believe, William Shore in Washington. It's a hunger relief organization.

Q. (By Ms. Jacoby) It's an organization. What's the function of that organization?

A. I believe it's a hunger relief organization and collects proceeds from restaurants to be distributed -- not -- yeah, proceeds. I

2304350017

believe it collects financial proceeds. I'm not entirely sure, but I know that it's a hunger relief organization.

Q. Did it do any fund raising?

A. I'm not aware --

MR. FOREMAN: For Hart?

MS. JACOBY: For Hart.

A. Not that I'm aware of.

Q. (By Ms. Jacoby) For any other candidate?

A. I don't know.

Q. Is there anything else pertinent to this investigation that you can tell us?

A. No.

MS. JACOBY: Counsel, would you have any questions you wish to ask?

MR. FOREMAN: Let me to kind of complete the record because I think I just want to make a couple things, I think, kind of clear by agreement.

First --

MS. JACOBY: Let's not say by

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agreement because we are not making an agreement.

MR. FOREMAN: I understand, and I want to make them clear and some of them you may even agree with. Wait and see.

First, in connection with Mr. Walto's deposition today, during the early answers to his questions it was made clear that when he declined to answer a specific question, it was in reliance upon the guarantee against self-incrimination as provided by the Fifth Amendment to the United States Constitution.

Thereafter, as we picked up speed throughout the contents of this morning, he short formed it and often he would simply say I respectfully decline to answer the question.

I want the record to be clear that in declining to answer any question posed to him by Ms. Jacoby the basis for that declination was only his assertion of his Fifth Amendment privileges against self-incrimination and did not have any other basis and did not on our part involve a refusal to answer any question propounded for

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any reason other than that the answer might tend to incriminate Mr. Walto.

Now, you'll have to agree with that, but I think that it was clearly our intent to simply move through this with a little more dispatch and I wanted to make sure clear that that was the --

MS. JACOBY: We recognize that that's what the litany referred to.

MR. FOREMAN: Second, I would simply like to complete the record in terms of the communications that have gone back and forth between myself on Mr. Walto's behalf and the Federal Election Commission prior to today's date because I think it was not altogether a surprise to counsel for the Government that we would take the Fifth Amendment privilege or assert the Fifth Amendment privilege with regard to all or some of the questions proposed.

Is that a fair statement?

MS. JACOBY: That's true.

MR. FOREMAN: And so that I may complete the record -- off --

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MS. JACOBY: Let's go off the record at this point.

(Discussion off the record.)

MR. FOREMAN: Okay. I think we are back on.

MS. JACOBY: We can resume the record at this time.

While we were off the record we discussed Mr. Foreman's intent to make comments regarding prior correspondence between himself and the Federal Election Commission, and we have agreed at this time that he can make those comments, but reserve the determination regarding submission of letters as exhibits.

MR. FOREMAN: Prior to today's date there have been a number of communications that have gone back and forth between myself and the Federal Election Commission concerning the privilege that Mr. Walto enjoys under the United States Constitution and the degree to which this privilege might be asserted in connection with today's deposition.

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So that this is fully put forth on the record, I would simply say that the first such contact which related both to the production of documents compelled by the subpoena as well as any testimony that Mr. Walto might be called upon to give was a letter by me to Mr. Lawrence Noble of the Federal Election Commission dated February 13, 1988, in which Lawrence Noble -- in which I advised the FEC of the existence of a parallel grand jury investigation in California and indicated that there may be a privilege issue raised.

Subsequently on May 16th, 1988, I wrote a somewhat extensive letter to Mr. Bernstein which set forth our position and what my understanding was of the degree to which the Fifth Amendment privilege both affecting civil slash administrative proceedings was applicable to such proceedings and further had the impact of precluding our full participation in a deposition.

Subsequent to that time I received a letter from Lawrence Noble. The letter is dated May 20th, 1988, in which I was advised that on May

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17th, 1988, the Federal Election Commission voted to authorize the Office of the General Counsel to file a civil suit for subpoena enforcement in the United States District Court. Mr. Noble's letter also characterized my earlier correspondence with the Commission as a blanket assertion of the privilege against self-incrimination.

Now, in response to that I wrote a letter back to members of the Election Commission dated June 3rd, 1988, which I again discussed exactly what my position was and disputed the assertion that Mr. Noble had made that what I had proposed in my correspondence was to make a blanket assertion of the privilege.

I think the record established here today does indicate that where we were capable of answering a question without doing violence to the Constitutional guarantees that are afforded to Mr. Walto, we attempted to answer those questions, and indeed there were certain responses made today that were responsive to the questions that were posed and as to which no privilege was asserted.

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It is our position that we have attempted to be selective in the responses that we have made.

It is also apparent to me that certain of the exhibits that were marked as deposition exhibits and tendered to the witness today are documents which were obtained by the Federal Election Commission via the Federal Bureau of Investigation.

As some of the letters that I have previously discussed indicate, there has been a Federal Bureau of Investigation investigation conducted in the Central District of California as to some of these same matters, and I have previously advised counsel that pursuant to an agreement that protected Mr. Walto within the context of that investigation, we had furnished all documents in his possession that were responsive to the Federal Election Commission subpoena to that other branch of the United States Government.

In June 1988 arrangements were made whereby the documents that were furnished to the United States Government in California could be

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passed on to the Federal Election Commission for purposes of this particular investigation and this particular Matter Under Review.

It is our position that by agreeing to allow those documents to be furnished, which was only done with an understanding with the Justice Department, that such production would not diminish the protections under which they had already been produced to the Government. We made those available to the FEC and indeed it would appear that the FEC has received those and had them available to it for today's deposition.

It is our position again that, consistent with his privilege against self-incrimination, we have made every effort to cooperate with the Federal Election Commission's investigation and I have letters both that I wrote to the United States Attorney for the Central District of California dated June 16, 1988, and a letter back to me from the Assistant United States Attorney who is handling this particular investigation in California by which those documents

2304350402 5

were made available to the FEC.

And, finally, there is a letter that I have written to the Federal Election Commission, Jonathan Bernstein, a lawyer who is an associate of Ms. Jacoby's, dated September 29, 1988, in particular anticipation of this deposition, and in that letter of September 29 I again reiterated what our position had been with regard to what questions we could answer here at this proceeding and, additionally, I made suggestions to Mr. Bernstein that might have made this particular deposition a more productive one from the standpoint of the Federal Election Commission.

Those suggestions were to either postpone the deposition until approximately December of this year at which point I might be in a better position to assess Mr. Walto's ultimate status in connection with the California criminal investigation or, in the alternative, urging the Federal Election Commission as a branch of Government to approach the Justice Department and secure for Mr. Walto a grant of judicial immunity pursuant to 18 United States

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Code 6001, et seq., by which his testimony could be fully made available to the Commission consistent with protections afforded him by the Fifth Amendment to the United States Constitution.

It would appear to me that no such effort to secure that immunity has been made or at least if it has, I'm unaware of it and there was no judicial immunity granted prior to today's date, and those documents I'm going to suggest be marked as exhibits to fully complete this record.

Additionally, I should state for the record -- and I'm not going to move that these be made a part of today's record unless counsel for the Government particularly wants them to be -- but I should also state for the record that I am in possession of an indictment that was returned against George Stuart Karl in approximately -- I forget -- it's either May or June of 1988 in the Central District of California in which Mr. Karl was indicted for violations of Title 18, United States Code, as well as Title 2 of the United States Code which I believe include the same statutory

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prohibitions which is the subject matter of this investigation and which I believe, as is made clear from the questioning, involves the same essential subject matter that Ms. Jacoby would like to have inquired of Mr. Walto today.

And I point that out only to establish for the record that the investigation in California is not an ethereal investigation, but is an investigation that has resulted in the actual indictment of people for violation of the laws.

Additionally, I have in my possession a plea agreement from the United States District Court for the Central District of California dated July 28, 1988, between George Stuart Karl, Jr., the defendant, and the United States Government in which in essence his plea agreement provides that he must plead guilty and did, in fact, plead guilty to count I of the indictment, which is a conspiracy count embracing practically all of the subject matters and timeframes that were inquired of by the Federal Election Commission today.

This matter resulted in Mr. Karl

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being initially set over for sentencing until September 19 and required as a part of his plea bargain that he fully cooperate by giving information to the Government in whatever context he wishes as to any person with whom he may have been associated with the matters that are relevant to his plea of guilty.

Although that was originally set for September 19, and it was anticipated originally that as of that date people including myself might have a better sense of exactly those individuals who may have exposure, criminal exposure, as a result of their involvement with George Stuart Karl, Jr., as it turned out, his sentencing was postponed until sometime in December, and at this point it is my understanding that the investigation is ongoing.

The reason why I proposed in my letter dated September 19, 1988, to Mr. Bernstein that this particular deposition be postponed until December was so that we might have a better sense of the overall scope of the Government's investigation in California, but as I indicated previously, that offer was declined.

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And, finally, I have available which I do not need to have at this point marked for the deposition, but I would like to refer to it at least, a written opinion by Judge Pamela Rymer of the United States District Court in the Central District of California relating to the assertion of the privilege in a deposition before the Federal Election Commission of a gentleman by the name of David Franklyn Stein.

In particular, I think that that opinion stands for the proposition that as to matters related to the subjects which Ms. Jacoby attempted to inquire into today, the assertion of the privilege against self-incrimination at least as made by Mr. Stein was a valid exercise of his Fifth Amendment privilege and the Federal Election Commission, of course, may not be in a position where it is overriding a Constitutional guarantee nor would anything that it has done to date suggest that it has attempted to override those guarantees, but I don't need to offer that opinion as part of the record today but simply to indicate that I'm aware of it and

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I think on some level it validates the position that we have taken in this particular deposition here today.

MS. JACOBY: The Commission has seen the letters and does recognize and appreciate the concern regarding any possible violation of Mr. Walto's assertion of self-incrimination and any liklihood he may be subject to criminal sanctions in a parallel investigation.

However, the Commission is empowered to investigate all violations of the Federal Election Campaign Act and to enforce that act civilly and therefore the Commission has initiated this investigation of which this deposition was a part.

I believe at this time that you have adequately stated your concern. You have certainly referenced each document to which you believe that concern was previously expressed and that reference should be adequate to incorporate into this record without the necessity of adding exhibits which do not give the response in all cases, and I think at this time I would respectfully decline to accept these as

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exhibits.

MR. FOREMAN: Off the record.

MS. JACOBY: One more time I want to recognize again that all things stated here are held in confidentiality under the statute and will not be released absent -- will not be released.

MR. FOREMAN: Off the record.

MS. JACOBY: Off the record.

(Discussion off the record.)

MR. FOREMAN: We can go back on the record.

MS. JACOBY: Back on the record.

MR. FOREMAN: We have had a previous conversation off the record about the nature of Ms. Jacoby's objection to these particular documents which I was prepared to tender as deposition exhibits. I guess I would have numbered them 4 through 10, which would have essentially consisted of the correspondence that I have previously described as well as certain other documents that I referenced.

It is my understanding at this point that there is no need to attach these documents. I

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believe it is Ms. Jacoby's concern that that these documents, first of all, may not fully describe the communications that have gone back and forth between the Federal Election Commission and myself and, additionally, that they unduly make the record cumbersome and expensive.

I think I can state that by agreement that in the event that this deposition or Mr. Walto's responses at this deposition become scrutinized by another forum in connection with questions about the validity of the assertion of the privilege that at that point it would be the Commission's position that I would be allowed to supplement the deposition record itself by producing in that forum the documents that I have described orally here today.

MS. JACOBY: We are agreed with that. I believe in your comments you've adequately referenced each of these documents should an action to compel testimony be undertaken. At that point all correspondence between yourself and the Commission would be made available as part of the record to the

2304350033

Court.

MR. FOREMAN: I have no other questions or comments.

MS. JACOBY: I would then like to remind you, Mr. Walto, that this proceeding and all the investigation is subject to our confidentiality requirements and that the deposition itself is an ongoing one and may be resumed at a later date, and we will therefore adjourn.

THE WITNESS: I understand.

(Deposition concluded at 11:35 a.m.)

* * * * *

2304350403 4

CERTIFICATE OF WITNESS

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I, DENNIS MICHAEL WALTO, the witness in the above deposition, do hereby acknowledge that I have read the foregoing transcript of my testimony and I state under oath that it, together with any attached Amendment to the Deposition, constitutes my sworn testimony.

I (✓) have ( ) have not made corrections on the attached Amendment to Deposition form.

Dennis M Walto
DENNIS MICHAEL WALTO

SUBSCRIBED AND SWORN TO before me this 21st day of NOVEMBER, 1988.

My Commission expires JUNE 29, 1990

John A. Redmond
NOTARY PUBLIC
Street 142 LINCOLN BLVD
City/State VENICE CA 90291

OFFICIAL SEAL
JOHN A. REDMOND
Notary Public-California
LOS ANGELES COUNTY
My Comm. Exp. June 29, 1990

230435 4035

REPORTER'S CERTIFICATE

STATE OF COLORADO)
) ss.
CITY AND COUNTY OF DENVER)

I, VIOLA J. LUNDBERG, Registered Professional Reporter, Certified Shorthand Reporter, and Notary Public for the State of Colorado, duly commissioned to administer oaths, do hereby certify that, previous to the commencement of the examination, the witness was duly sworn to testify to the truth in relation to the matters in controversy between the said parties; that the said deposition was taken in stenotypy by me at the time and place aforesaid and was thereafter reduced to typewritten form by computer-aided transcription (CAT); that the foregoing is a true and correct transcript of my notes thereof;

That I am not attorney nor counsel, nor in any way connected with any attorney or counsel interested in the outcome of this action.

IN WITNESS WHEREOF, I have affixed my signature and seal this 23rd day of October, 1988.

My commission expires May 9, 1991.

Viola J. Lundberg

Viola J. Lundberg, Notary Public
227 South Lamb Lane
Golden, Colorado 80401

2304350 40036

MONTH: July 1986

DENNIS WALTO

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
29 JUNE	30 WASH, DC	1 WASH, DC	2 WASH, DC	3	4	5
6	7	8	9 DENVER CO	10 DENVER CO	11 DENVER CO	12 DENVER, CO
13 CHICAGO/BUFFALO	14 BUFFALO, NY	15 BUFFALO, NY	16	17	18	19
20	21	22	23 CHICAGO, IL	24 CHICAGO, IL	25 CHICAGO, IL	26 CHICAGO, IL
27 CHICAGO, IL	28 CHICAGO, IL	29	30	31 NEW ORLEANS	1 AUGUST NEW ORLEANS	2 NEW ORLEANS

EXHIBIT 1

9 3 0 4 3 5 3 4 0 3 7

MONTH: OCTOBER

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
	1	2	3 LV. for ORLANDO	4 ORLANDO	5 ORLANDO	6 ORLANDO
7 ORLANDO	8 ORLANDO EVENT	9 RETURN LH OR CO	10 COLORADO →	11 →	12 →	13 →
14 →	15 →	16 RETURN LA 53 →	17	18 LV - for CONNECTICUT CONNECTICUT →	19 →	20 EVENT
21 INDIANA ?	22 DC →	23 →	24 LV. FOR WYOMING CASPER	25 CASPER	26 CASPER	27 EVENT CASPER WY
28 WASH, DC	29 WASH, DC	30 RETURN LH	OCTOBER 1 *	*	*	*
*	*	*	*	*	*	*

MONTH: OCTOBER

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
			1	2	3	4
5 LV fr SEATTLE — SEATTLE	6 — SEATTLE	7 EVENT — SEATTLE	8 LV fr PORTLAND AND - NIGHT FLIGHT LA? — PORTLAND / LA	9 — CALIFORNIA → → →	10 →	11 → CA
12 OFF	13 LV fr BOSTON — BOSTON	14 IOWA INDIANA — BOSTON	15 WISC CHICAGO - CHICAGO - — BOSTON	16 I — BOSTON EVENT	17 LV- NEW JERSEY → — NEW JERSEY →	18
19 PH? — NEW JERSEY	20 LV- North Carolina — NORTH Carolina	21 — NC EVENT	22 LV- FOR MISSISSIPPI GEORGIA ATLANTA — MISSISSIPPI	23 — MISSISSIPPI	24 EVENT — MISSISSIPPI	25 RETURN LV fr Co
26 OPEN	27 OPEN New Mexico	28 OPEN / SOUTH	29 OPEN / OHIO	30 OPEN IOWA WIS. N.D.	31 WISC ILL. OPEN Co.	NOVEMBER

MEMO

TO: STUART KARL, BILL DIXON, BILLY SHORE

FROM: DENNIS WALTO

RE: CHICAGO/ BUFFALO/ NEW ORLEANS ASSESMENT

DATE: 15 AUGUST 1986

The purpose of this memo is to bring to light a positive and negative assesment of Gary W. Hart's recent speaking engagements. For each visit I will look at; text vs. audience and presentation of the speech itself, as well as a general logistics overview (or underview in my case!).

CHICAGO/ CITIZEN ACTION

*Event: Address to Midwest Academy Retreat, Appx. 1500 Delegates

*Text: Overall excellent. Delivered the necessary strokes and challenges to an initially skeptical audience. A vast majority of delegates left the hall with a positive view of GWH's policies and persona. Ira Arlook (Ex. Director Citizen Action) and Heather Booth (President, Midwest Academy) seem to be supporters and should, for what its worth, be courted.

*Presentation: In the course of remarks by GWH , there were a group of statements refered to as the "Scandle Series". These 1 or 2 sentence observations illustrated a Regan Administration shortcoming, and were automatic applause lines (A.A.L.). This series of statements has the potential to really ignite a crowd and could result in a standing ovation each time. The key element in this sequence is learning to speak through applause. In Chicago, we allowed the audience to peak and return to silence before the next applause line. If we had spoken through the applause, never allowing the crowd to stop their acknowledgement, we would have built in an intensity level that would have resulted in a standing ovation following the "Stephen Biko..... Thomas Jefferson." A.A.L. that brought the house down in Baltimore (NAACP Convention). Also speaking through applause forces the orator to raise his/her cadence resulting in a more forcefull delivery.

In Chicago, our sound system was excellent. A crisp sound, good press feed and little or no feedback. Unfortunately, there were no cameras to record our event.

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NEW YORK/ CUMO ISSUES FORUM

*Event: State Democratic Party Issues Forum; Economic Redevelopment.

*Text: Excellent text, difficult crowd, but when you play on the Govenor's home field you do not expect a Colorado welcome. The speech was technically very good. It was difficult at times to follow the international economic policy remarks. The audience seemed to listen attentively, but not quite get the message. The Strategic Investment Initiative is a winner. People buzzed about that afterwords. The national interest over special interest remarks are a well received theme.

*Presentation: Through a series of last minute negotiations both parties aggreed that a head table seating arrangement, not stage seating best suited the interests of all concerned. This immediately gave an informality to the setting and provided a good opportunity for GWH to "loosen his tie," following his remarks. Unfortunately a time shortage may have altered GWH's plans to utilize the detachable microphone and really turn some heads. I will continue, whenever appropriate to provide the Senator with this option and opportunity. The concept of utilizing the detachable microphone and roaming an audience is new and innovative in the political spectrum. It would furthermore shed GWH of any "aloofness" stereotype in the media. I feel its very important that GWH utilize this technique first, it seems too good an idea for a Babbit or Kemp to pass-up. We need to set the standard. This technique could easily be referred to as a "Hart Style Forum" in the future.

NEW ORLEANS:/ NATIONAL CONFERENCE OF STATE LEGISLATORS

*Event: Speech to Bi-partisan Delegation Appx. 3000 people.

*Text: Brief, but well tailored for the bi-partisan crowd. Remarks were accepted well and our text was interrupted several times by applause. (Kemp was never interupted). Our substance oriented speech was not unexpected but perhaps a little of the unexpected would have loosened the crowd up a bit. (Gov. Edwin Edwards spent 20 min. telling jokes and 5 on a text, and they loved him) We could have used a little humor to break to break the ice, but again our time constraints were imposing.

*Presentation: Overall we had a superior presentation compared to Kemp, an excellent visual (as seen on C-Span) showcasing the Colorado flag, and an excellent sound system. A teleprompter would have really iced the cake here. GWH's cadence was good and his tone forcefull. A smile and raising of the eye-brows following a question is our trump card- I had several comments on how good GWH looks when he smiles.

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OVERALL ASSESMENT

Logistically the swing was very strong. Timing was precise and schedules were tight. We ended up catching the three departure planes by a total of 10 min. Not bad!

Our organization in each area was exceptional. Its quite a change from 1984 where things were thrown together. These people are organized and hungry. They all get an A+.

In the words of Brigham Young: "Thats all for now."

DMW/dl

2304353 0042

Page I

PHONE MESSAGES

DATE: 10/14/86

Name & No.	RE:	SK Response:	Who will call back: SK	MS	RM	Other
Bill Co (917-10-3935	Please call me re Employment ...					
Gary He (30) 251-7122	It's a beautiful day to a lunch ...					
Phil	Hi! (Terry wants to talk about a Bill)					
Steve Wood 213-820-1-257	Not re: Gary Hart to attend ...					
Susan Carey 624-2292	Leaves 5:30 or 6:00 pm Will call in the morning					
Dennis Waite (213) 627-6145	Doesn't think he needs to see me now —					
Steve de Mos (213) 203-2111	Will you be going to [illegible] and Washington at a reception tonight or tomorrow?	(No)			X	
Mark Gerry 451-5152	Wants to see Gary ...	Someone must be there				
Lou Waters	Needs "Nut" for W.L. and more from you right now	— I'll call Jr.				
[illegible]	re/a Reason we did not meet the Dem to the Senate will be on					
J [illegible] Thurber	Session Tuesday. (213) 752-5091 — Will be in office today.					
Dan Angel 213-821-0211	Wit for Bus Sales ... 12:15 pm script "By Hill Dem". Going into ...	proj.				
Mr. Penfield 213-204-9191	Said - You Know Him ...					
[illegible]	re: Shelley [illegible]	9 3 0 4 3 5				

Walter
EXHIBIT
3

MEMO

TO: SUE, GREG, SHORE, EMMO

FROM: WALTO

RE: ADVANCE IN APRIL/MARCH

DATE: 17 FEB 1987

the following are trips in which i feel that advance is needed. as my expenses and travel present no burden to the campaign, i feel my presence can serve to both advance the event and begin to network the existing advance talent in those areas. if anyone see's the need for additional trips, i am always willing to entertain the suggestion and hit the road if necessary.

2304330440

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STENOTYPE REPORTERS

HAND DELIVERED

88 AUG 10 AM 10:52

8 August 1988

Federal Election Commission
ATTN: Jonathan Bernstein, Esquire
999 E Street, Northwest
Washington, DC 20463

Re: Deposition of DAVID FRANLYN STEIN,
Los Angeles CA, 25 April 1988.

Dear Mr. Bernstein:

Enclosed is the above-entitled deposition, which has been read and signed by the Deponent. Corrections are noted on the list of corrections prepared by the Deponent.

Sincerely,

Edwin G. Crowley, Deposition Supervisor.

88 AUG 10 AM 11:33

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Deposition of DAVID FRANKLYN STEIN,
Los Angeles C[illegible]25 [illegible]11 1988.

CORRECTIONS TO DEPOSITION

Page	Line	Correction:
5	11	Zip code - 92651
5	13	Area (typo)
Exhibit 1 4	4	"To The Witness"Section - omit "and understand"

2304335340446

ORIGINAL

TRANSCRIPT OF PROCEEDINGS

UNITED STATES OF AMERICA

BEFORE THE

FEDERAL ELECTION COMMISSION

- -x
:
IN RE: :
:
MATTER UNDER REVIEW 2583 :
:
- -x

DEPOSITION OF DAVID FRANKLYN STEIN

Los Angeles, California

Monday, April 25, 1988

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2304350040047

BEFORE THE

FEDERAL ELECTION COMMISSION

IN RE:

Matter Under Review) MUR 2583

DEPOSITION UPON ORAL EXAMINATION OF

DAVID FRANKLYN STEIN

BE IT REMEMBERED that, pursuant to Notice of Deposition and on Monday, the Twenty-fifth of April 1988, commencing at the hour of 9:30 a.m. thereof, at the Federal Building, Room 7210, 300 North Los Angeles Street, Los Angles, California, before me, HARRY ATTMORE Notary Public in and for the County of Los Angles, State of California, personally appeared

DAVID FRANKLYN STEIN

called as a witness by the Federal Election Committee who, being by me first duly sworn, was thereupon examined and interrogated as hereinafter set forth.

oOo

2304350048

For the Federal Election Committee:

JONATHAN BERNSTEIN, Esq., and
CELIA JACOBY, Esq.
Federal Election Committee
999 "E" Street, N. W.
Washington, D. C. 20463

For the Deponent, David F. Stein:

ED MEDVENE, Esq.
Mitchell, Silberberg & Knupp
11377 West Olympic Boulevard
Los Angeles, California 90064

o0o

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WHEREUPON, the following proceedings were had and testimony given, to wit:

MR. BERNSTEIN: We are on the record this morning in the course of Federal Election Commission investigation entitled Matter Under Review, or MUR, 2583, for a deposition of Mr. David Stein, who is a respondent in this matter and a witness.

My name is Jonathan Bernstein; and with, me for the Commission this morning, is Celia Jacoby.

At this point, I would ask the reporter to please swear in the witness.

Whereupon,

DAVBID FRANKLYN STEIN

called as a witness by the Federal Election Commission being duly sworn the Notary Public to tell the truth,the whole truth and nothing but the truth, was examined and testified as follows:

EXAMINATION

BY MR. BERNSTEIN:

Q Mr. Stein, could you state your full name, please.

A David Franklyn Stein.

Q And Mr. Stein, before we went on the record, I handed you an instruction sheet entitled "To the Witness," and did you read that statement and sign it?

A Yes, sir; I did.

MR. BERNSTEIN: Thank you.

At this time, I will hand it to the Reporter as Exhibit 1 to today's deposition.

(The document referred to was marked Exhibit No. 1 for identification.)

BY MR. BERNSTEIN:

Q Please give us your home address, Mr. Stein.

A [redacted]

Q And your home phone number?

A [redacted]

MR. MEDVENE: May we have an understanding that we will get a copy of the transcript?

MR. BERNSTEIN: Well, in the ordinary course, you will have a chance to review the transcript and to sign it before a Notary Public.

Off the record for a second.

(Discussion off the record.)

MR. BERNSTEIN: On the record.

BY MR. BERNSTEIN:

Q Mr. Stein, on March 4, 1988, the Commission mailed you a notification. The notification included a factual and legal analysis, which detailed two findings the

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Commission, reason-to-believe findings, the Commission had made against you. The notification also included a subpoena for the production of documents and for your attendance at this deposition.

Did you receive that notice?

MR. MEDVENE: Counsel, as we told you before we started, out of an abundance of caution, I advised the witness that it would be inappropriate at this time for him to answer any questions. I think, reluctantly, we must start with this first question. So, if you want to go through, the witness will make whatever statement he is going to make on this question. I would anticipate that it will be, depending on the question, questions that you, then ask; but, on my advice, he is not going to answer this question.

MR. BERNSTEIN: Before we deal with that, why don't we, at this time --

BY MR. BERNSTEIN:

Q Mr. Stein, are you represented by counsel here today?

A Yes, I am.

Q Could you identify him, please.

A Counsel is Ed Medvene.

MR. BERNSTEIN: Mr. Medvene, Mr. Stein, let me at this time record, in brief, the discussions that we

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have had before we went on the record, and let me try to state at least our position in this matter.

As I explained, Mr. Stein is a respondent in this case, as to two issues. Both of them involve the 1984 election campaign cycle. The Federal Election Campaign Act contains a three-year statute of limitations. In view of this, our position, at least at this point, is that an invocation of the privilege against self-incrimination is not properly invoked, as to these matters. Furthermore, the question as to whether Mr. Stein, in fact, received the Commission's notification in this matter, we don't see how that question could pose any reasonable apprehension of prosecution, as well.

In view of that, I would ask the witness to answer the question.

MR. MEDVENE: Since you put a part of our preliminary discussion on the record, let me summarize the rest.

We explained to you that, despite Mr. Stein's willingness to be fully cooperative and to participate in this hearing, he has agreed to follow my recommendation that he not testify at this time, in light of correspondence that has been recently received from the U. S. Attorney's office here in the Central District of Los Angeles, where the assistant assigned to handling this

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matter has indicated that Mr. Stein is a subject or target of a criminal investigation that the Department of Justice is now running. So, because of that, we have had to give Mr. Stein the advice we gave him.

He will take whatever privilege is the Constitution affords him on this question, because of my concern about the proverbial links in a chain; and I wouldn't want him to answer one question where somebody might, then, be able to argue that he has waived his right or ability to answer subsequent questions. It is possible that one might interpret whether he received this notice as the first link in the proverbial chain, which might, if he answered that, then, require him to answer subsequent questions about the areas in controversy here.

So, with that explanation, if you want Mr. Stein formally to decline to answer on my advice, he will do so; if it is sufficient that I have indicated that he will decline to answer, we can move ahead with whatever is best for you.

MR. BERNSTEIN: Mr. Medvene, is it your position, then, that -- You understand, Mr. Medvene, that the Commission's investigations are civil investigations. Do you understand that?

MR. MEDVENE: Understand that is what you advised me, and that is what the statute appears to

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indicate.

MR. BERNSTEIN: And, is it your position that any question at all about Mr. Stein's receipt of the Commission's notification of this civil investigation would pose the possibility of incrimination in the later proceeding?

MR. MEDVENE: I think I stated our position. You know, there is one Department of Justice, and you are with the Department of Justice; is that right?

MR. BERNSTEIN: No, we are not.

MR. MEDVENE: You are an independent Agency, but you refer matters to the Department of Justice.

MR. BERNSTEIN: I think, as I explained off the record, and maybe it behooves us now to get into it a little more fully, the Commission is an independent Agency and is not an Agency of the Department of Justice. Although the Commission has the ability to refer matters to the Department of Justice upon the conclusion of the civil investigation, matters involving the 1984 election cycle, a referral would be foreclosed because of the three-year statute of limitation on criminal prosecutions. So, as far as we are concerned, presumably, the Commission could refer such matters. The statute doesn't prohibit the Commission from doing that in such circumstances, but it would be futile in view of the statute of limitations. So, we don't

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see that as being a reasonable basis for invocation of the privilege.

MR. MEDVENE: Well, I state our objection; but really, to cut through it, if you are right, it would be pretty easy, there have been communications -- as I understand it from what you said previously -- with the United States Attorney's office. Is that correct?

MR. BERNSTEIN: Well, I don't feel that we can discuss what communications, if any, have--

MR. MEDVENE: I am not asking you for what communications, just you have talked to them; is that correct?

MR. BERNSTEIN: As I said, I am not in a position to--

MR. MEDVENE: Can't even tell if you have talked to them?

MR. BERNSTEIN: I am not in position to discuss that, really.

MR. MEDVENE: All right. Well, if you are not in the position, it seems to me the easiest way to go about it is to call them, tell them to revoke their letter, and say he is not a target, he is not under investigation, that the statutes have run and they are not looking them. That is all you have to do. I mean, I would think you have already spoken to them; you certainly know who they are.

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Just get them to say he is not under investigation; there is not going to be any criminal case, for whatever reason.

MR. BERNSTEIN: Well, all I can say, Mr. Medvene, is, as I have tried to explain, the Commission conducts its investigations independently. What I was positing simply was the basis for our position of not understanding what the reasonable, you know, fear of prosecution might be.

MR. MEDVENE: That stands--

MR. BERNSTEIN: And, quite obviously, if you were going to instruct your client not to answer the question, he won't answer it.

MR. MEDVENE: Right.

MR. BERNSTEIN: And maybe, at this point, I would like, as you suggested, Mr. Stein to formally indicate that.

MR. MEDVENE: Sure.

THE WITNESS: Even though I would like to be cooperative, on the advice of counsel, I must reluctantly decline to testify under the basic protection offered me by the United States Constitution.

BY MR. BERNSTEIN:

Q Mr. Stein, please tell us what efforts, if any, you made to comply with the Commission's subpoena that was included in the notification we just discussed?

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A Even though I would like to be cooperative, on the advice of counsel, I must reluctantly decline to testify under the basic protection offered me by the United States Constitution.

Q What documents, if any, Mr. Stein, did you collect in attempting to respond to the Commission's subpoena.

MR. MEDVENE: Could he say, instead of reading the same thing, just say same statement? Or do you want him to read the same, say the same thing each time, or could he say, same statement, just to move it along?

MR. BERNSTEIN: Off the record.

(Discussion off the record.)

MR. BERNSTEIN: On the record.

Yes, Mr. Stein, some sort of summary statement, as counsel suggested, would suffice.

THE WITNESS: Thank you. I repeat my previous statement.

BY MR. BERNSTEIN:

Q Please specify the types of documents that you collected or possess that are responsive to the Commission's subpoena?

A I repeat my previous statement.

Q Do the responsive documents include those relating to your fund raising activities on behalf of

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Americans With Hart?

A I repeat my previous statement.

Q Do the documents that are responsive relate to negotiations toward and the purchase of a computer in February 1984 from Americans With Hart?

A I repeat my previous statement.

Q Are there documents responsive which memorialize communications or meetings with Douglas Rosen, Keith Glaser, or other officers, employees, agents or advisers of American With Hart?

A I repeat my previous statement.

Q Mr. Stein, were you involved in Mr. Hart's 1984 primary campaign for president?

A I repeat my previous statement.

Q When did your involvement in that campaign begin?

A I repeat my previous statement.

Q What is your employment, Mr. Stein?

A I repeat my previous statement.

MR. BERNSTEIN: Off the record.

(Discussion off the record.)

MR. BERNSTEIN: On the record.

BY MR. BERNSTEIN:

Q Please describe the nature of your employment?

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Q Are you acquainted with a Mr. Douglas Rosen, Mr. Stein?

A I repeat my previous statement.

Q Are you acquainted with a Mr. Bernard Schneider, Mr. Stein?

A I repeat my previous statement.

Q Please describe all communications or meetings you had with Mr. Rosen, Mr. Schneider, or any officers, agents, or employees of Gary Hart's 1984 campaign.

A I repeat my previous statement.

Q Please describe all other meetings or communications with any of the individuals I have just mentioned?

A I repeat my previous statement.

Q Were fund raising techniques ever discussed at any of these meetings or communications?

A I repeat my previous statement.

Q Were methods of circumventing the Federal Election Campaign Act's contribution limitations and prohibitions ever discussed?

A I repeat my previous statement.

Q Was the reimbursement of contributions ever discussed?

A I repeat my previous statement.

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A I repeat my previous statement.

Q How long have you been employed at your current position?

A I repeat my previous statement.

Q And what was your prior employment?

A I repeat my previous statement.

Q Are you acquainted with a Mr. Stuart Karl, Mr. Stein?

A I repeat my previous statement.

Q Have you had business dealings with a Stuart Karl or any of his companies?

A I repeat my previous statement.

Q Please describe each business transaction, if any, you have had with Mr. Karl or his companies?

A I repeat my previous statement.

Q How did you first become involved in Gary Hart's 1984 campaign?

A I repeat my previous statement.

Q When did your association, if any, with Stuart Karl begin?

A I repeat my previous statement.

Q Please describe all communications or meetings you had with Stuart Karl in connection with the 1984 Hart campaign?

A I repeat my previous statement.

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Q Are you acquainted with a Mr. Douglas Rosen, Mr. Stein?

A I repeat my previous statement.

Q Are you acquainted with a Mr. Bernard Schneider, Mr. Stein?

A I repeat my previous statement.

Q Please describe all communications or meetings you had with Mr. Rosen, Mr. Schneider, or any officers, agents, or employees of Gary Hart's 1984 campaign.

A I repeat my previous statement.

Q Please describe all other meetings or communications with any of the individuals I have just mentioned?

A I repeat my previous statement.

Q Were fund raising techniques ever discussed at any of these meetings or communications?

A I repeat my previous statement.

Q Were methods of circumventing the Federal Election Campaign Act's contribution limitations and prohibitions ever discussed?

A I repeat my previous statement.

Q Was the reimbursement of contributions ever discussed?

A I repeat my previous statement.

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Q Were direct payments to campaign vendors ever discussed?

A I repeat my previous statement.

Q Was the provision of services or goods ever discussed?

A I repeat my previous statement.

Q Was the disguising as contributions, the disguising of contributions as legitimate business expenses ever discussed?

A I repeat my previous statement.

Q If your answer to any of the previous questions on the methods that I have just asked Mr. Stein is yes, please tell us the dates, location and individuals who participated in any of these meetings or communications.

A I repeat my previous statement.

Q Please summarize the gist of the conversation at these meetings or communications.

A I repeat my previous statement.

Q Mr. Stein, during the 1984 -- strike that.

Mr. Stein, during 1984, were you aware of anyone who reimbursed the contributions of others?

A I repeat my previous statement.

Q Are you aware of anyone who made direct payments to campaign vendors?

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A I repeat my previous statement.

Q Were you aware of anyone who provided in-kind services to a campaign without compensation?

A I repeat my previous statement.

Q How did you first meet Mr. Gary Hart?

A I repeat my previous statement.

Q Were you on the executive committee of Mr. Hart's 1984 campaign?

A I repeat my previous statement.

Q What did membership on the executive committee involve?

A I repeat my previous statement.

Q Did you hold any fund raisers or participate in any fund raisers on behalf of Gary Hart's 1984 campaign?

A I repeat my previous statement.

Q What were the dates of these fund raisers, if any, and who attended them?

A I repeat my previous statement.

Q Did you host any fund-raising events for Gary Hart's 1984 campaign?

A I repeat my previous statement.

Q To your knowledge, did employees of Stuart Karl ever attend any of these fund raisers?

A I repeat my previous statement.

Q If the answer was yes, what were the dates of

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the fund raisers at which these employees attended?

A I repeat my previous statement.

Q Who attended who, to your knowledge, were employees of Stuart Karl at each fund raiser?

A I repeat my previous statement.

Q Describe any other meetings, communications, fund raisers, or other activities in connection with the 1984 Hart Campaign?

A I repeat my previous statement.

Q Do you know anything else about fund raisers for the 1984 Hart Campaign?

A I repeat my previous statement.

Q Mr. Stein, do you know a Steven Alfers?

A I repeat my previous statement.

MR. MEDVENE: How do you spell Alfers?

MS. JACOBY: A-l-f-e-r-s.

BY MR. BERNSTEIN:

Q Please describe the dates and substance of all communications with Mr. Alfers.

A I repeat my previous statement.

Q To your knowledge, what involvement, if any, did Steven Alfers have in the 1984 Hart Campaign?

A I repeat my previous statement.

Q Do you know Patrick Caddell?

A I repeat my previous statement.

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Q To your knowledge, what, if any, involvement did Mr. Caddell in Gary Hart's 1984 Campaign?

A I repeat my previous statement.

Q Please tell us the dates and substance of all communications or meetings you had involving Mr. Caddell?

A I repeat my previous statement.

Q Do you know a Sue Casey, Mr. Stein?

A I repeat my previous statement.

MR. MEDVENE: Would it be helpful if there is a list of names, to read the entire list, and ask him if he would give any different answer with respect to anyone on the list; and, if so, who? I am just trying to move it along if we can.

MR. BERNSTEIN: Off the record for a second.

(Discussion off the record.)

MR. BERNSTEIN: On the record.

BY MR. BERNSTEIN:

Q Mr. Stein, I am going to read you a list of following individuals. As to each of them, please tell me if you know the individual; to your knowledge, what involvement that individual had in the 1984 Gary Hart Campaign; and, lastly, the dates and substance of all communications and meetings you had involving these individuals.

MR. BERNSTEIN: Off the record.

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(Discussion off the record.)

MR. BERNSTEIN: On the record.

BY MR. BERNSTEIN:

Q The names of these individuals are as follows: Sue Casey, Michael Cheroutes, William Dixon, James Dwinell, Keith Glaser, Kenton Granger, Oliver Hinkel, Michael Moore, Steve Rivers, Douglas Rosen, Bill Shore, Raymond Struthers, Christopher Townsend, Richard Wagner and Dennis Walto.

A I repeat my previous statement.

MR. BERNSTEIN: The record should reflect that Mr. Medvene had agreed for me to pose the questions in this form to speed up the process.

MR. MEDVENE: That is correct.

BY MR. BERNSTEIN:

Q Do you know of anything else involving the activities of these individuals, Mr. Stein?

A I repeat my previous statement.

Q Mr. Stein, did you engage in a transaction with Americans With Hart in February 1984?

A I repeat my previous statement.

Q Mr. Stein, I am now handing you a copy of report of receipts and disbursements by Americans With Hart covering the period February 1, to February 29, 1984, Exhibit 2 to this deposition, and I ask that you look at

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the second page of this two-page document. It purports to describe a sale-leaseback of computer equipment between you and the Committee. Does this refresh your recollection about the transaction?

A I repeat my previous statement.

(The document referred to was marked Exhibit No. 2 for identification.)

BY MR. BERNSTEIN:

Q Had you ever engaged in a sale-leaseback transaction before this transaction?

A I repeat my previous statement.

Q How did the transaction arise?

A I repeat my previous statement.

Q What communications or meetings did you have relating to this transaction?

A I repeat my previous statement.

Q Who participated in these meetings or communications?

A I repeat my previous statement.

Q When did these communications or meetings take place?

A I repeat my previous statement.

Q Please specifically describe the involvement of Stuart Karl, Douglas Rosen, Keith Glaser, Bernard

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Schneider and Christopher Townsend in this transaction.

A I repeat my previous statement.

Q Please describe the substance of all the communications or meetings you had relating to this transaction.

A I repeat my previous statement.

Q Who suggested the transaction be set up?

A I repeat my previous statement.

Q Who suggested the transaction be structured as a sale-leaseback?

A I repeat my previous statement.

Q Was anyone else involved--

A I repeat my previous statement.

Q --in setting up or discussing the transaction?

A Excuse me. I repeat my previous statement.

Q At the time of the transaction, were you not a financial supporter of Gary Hart's 1984 campaign?

A I repeat my previous question, excuse me, statement.

Q You can ask questions, if you like, and I will answer.

A You think by now I would have that right, wouldn't you? Sorry.

Q What was the purpose of the transaction, Mr.

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Stein?

A I repeat my previous statement.

Q What was your understanding of why the Hart Committee sought to carry out the transaction?

A I repeat my previous statement.

Q What was your purpose of entering into the transaction, Mr. Stein?

A I repeat my previous statement.

Q Please describe the computer that was involved in the transaction?

A I repeat my previous statement.

Q What was the estimated value of the computer?

A I repeat my previous statement.

Q Was your purpose in entering into the transaction to provide funds to the Hart campaign for its ongoing operations?

A I repeat my previous statement.

Q Did you have a business use for the computer that was involved in the transaction?

A I repeat my previous statement.

Q Did you discuss the propriety of the transaction with anyone prior to entering into it?

A I repeat my previous statement.

Q Who, if anyone, did you discuss the propriety with?

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A I repeat my previous statement.

Q When did this discussion or discussions take place?

A I repeat my previous statement.

Q What was the substance of the discussion?

A I repeat my previous statement.

Q What were the specific terms of the transaction?

A I repeat my previous statement.

Q What remedies were available if the committee defaulted in its lease payments?

A I repeat my previous statement.

Q How were the amounts of the lease payments determined?

A I repeat my previous statement.

Q What was the amount of the lease payment?

A I repeat my previous statement.

Q Did the lease payment reflect the market value of the computer?

A I repeat my previous statement.

Q Did you carry out the transaction, Mr. Stein?

A I repeat my previous statement.

Q Did you pay $20,000 to the campaign in connection with the transaction?

A I repeat my previous statement.

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Q How did you determine the amount to be paid by you?

A I repeat my previous statement.

Q What was the source of the funds for this payment?

A I repeat my previous statement.

Q How were the funds transferred to the committee?

A I repeat my previous statement.

Q What documents, if any, do you know of recording the transfer of funds?

A I repeat my previous statement.

Q What documents, if any, do you know of recording the transaction?

A I repeat my previous statement.

Q Did you receive a lease payment in March 1984?

A I repeat my previous statement.

Q Did you receive a lease payment in April 1984?

A I repeat my previous statement.

Q Did you receive a lease payment in May 1984?

A I repeat my previous statement.

Q Did you receive a lease payment in June 1984?

A I repeat my previous statement.

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Q Did you receive a lease payment in July 1984?
A I repeat my previous statement.
Q When you failed to receive a lease payment, what did you do?
A I repeat my previous statement.
Q Did you repossess the computer?
A I repeat my previous statement.
Q How did this repossession, if any, take place?
A I repeat my previous statement.
Q Who took possession of the computer?
A I repeat my previous statement.
Q When did the repossession, if any, take place?
A I repeat my previous statement.
Q Was this during or after the Democratic National Convention in July 1984?
A I repeat my previous statement.
Q Did the committee have the use of the computer at the convention?
A I repeat my previous statement.
Q Why did you not repossess the computer sooner, Mr. Stein?
A I repeat my previous statement.
Q If you repossessed the computer, what did you

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then do with it?

A I repeat my previous statement.

Q Did you ever make any business use out of the computer?

A I repeat my previous statement.

Q Did you, at sometime, sell the computer?

A I repeat my previous statement.

Q When did you sell it?

A I repeat my previous statement.

Q And, for how much?

A I repeat my previous statement.

Q And to whom?

A I repeat my previous statement.

Q Did you ever make personal use of the computer?

A I repeat my previous statement.

Q Did you have any other transactions with the 1984 Hart Committee?

A I repeat my previous statement.

Q Did you have any transactions with Stuart Karl, or any of his businesses--

A I repeat my previous statement.

Q --during 1984?

A I repeat my previous statement, excuse me.

Q Do you recall making a $30,000 payment to

9304350407 5

Karl's business in May 1984?

A I repeat my previous statement.

Q Mr. Stein, I am handing you Exhibit 3 to the deposition, which is a one-page document, at the top, entitled "Karl Production -- Checking." It purports to reflect a deposit of $30,000 from David Stein on May 25, 1984. Is that your understanding of what the document reflects?

A I repeat my previous statement.

(The document referred to was marked Exhibit 3 for identification.)

BY MR. BERNSTEIN:

Q Please describe the details of this transaction, Mr. Stein?

A I repeat my previous statement.

Q What was the purpose of this transaction?

A I repeat my previous statement.

Q What communications or meetings did you have regarding this transaction?

A I repeat my previous statement.

Q Please describe the participants and dates of these meetings?

A I repeat my previous statement.

Q What was the substance of these

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communications or meetings?

A I repeat my previous statement.

Q How was the deposit effected?

A I repeat my previous statement.

Q Who received the funds at Stuart Karl's business?

A I repeat my previous statement.

MR. BERNSTEIN: Off the record for a second.

(Discussion off the record.)

MR. BERNSTEIN: On the record.

BY MR. BERNSTEIN:

Q What connection, if any, did this transaction have with the 1984 Hart Campaign?

A I repeat my previous statement.

Q Mr. Stein, I would now like to discuss your direct campaign contributions in connection with the 1984 election cycle. And let me begin by showing you Exhibit No. 4 to this deposition, which is a report of receipts and disbursements of Americans With Hart, Inc. It is a two-page document. On the bottom of the second page, it indicates the receipt of a contribution from you, Mr. Stein, in December 1982.

Did you make a contribution of a thousand dollars to Americans With Hart in December 1982?

A I repeat my previous statement.

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(The document referred to was marked Exhibit No. 4 for identification.)

BY MR. BERNSTEIN:

Q How did you come to make this contribution, Mr. Stein?

A I repeat my previous statement.

Q Mr. Stein, Exhibit No. 5 is a two-page document, Report of Receipts and Disbursements of the DNC Services Corporation, Democratic National Committee. On the second page, it reflects contribution by you in February 1984.

Did you contribute $4,000 to the Democratic National Committee in February 1984?

A I repeat my previous statement.

(The document referred to was marked Exhibit No. 5 for identification.)

BY MR. BERNSTEIN:

Q Exhibit No. 6 is a contribution report, again, of the Democratic National Committee. On the second page of the document, it reflects additional contribution by you.

Did you contribute $5,000 to the Democratic National Committee in May 1984?

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A I repeat my previous statement.

(The document referred to was marked Exhibit No. 6 for identification.)

BY MR. BERNSTEIN:

Q Exhibit 7, Mr. Stein, is another report of the Democratic National Committee, this one for the period of June 1984. On the second page, it reflects three transactions dated 6-4-84.

Do you recall these transactions, Mr. Stein?

A I repeat my previous statement.

(The document referred to was marked Exhibit No. 7 for identification.)

BY MR. BERNSTEIN:

Q Please describe each of them.

A I repeat my previous statement.

Q Did you make a contribution of $5,000 in June 1984 to the Democratic National Committee?

A I repeat my previous statement.

Q Did you make a contribution of an additional $10,000 in June 1984 to the Democratic National Committee?

A I repeat my previous statement.

Q Did you receive a reimbursement or a credit from the Democratic National Committee at that time in the

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amount of $10,000?

A I repeat my previous statement.

Q When did the reimbursement or credit take place?

A I repeat my previous statement.

Q How long after your initial contribution of $10,000 did the reimbursement or credit take place?

A I repeat my previous statement.

Q What was the reason for the reimbursement or credit?

A I repeat my previous statement.

Q Exhibit No. 8, Mr. Stein, is also a report from the Democratic National Committee for the period of September 1984, and it reflects another contribution by you on page of the document.

Did you make a thousand dollar contribution tot he Democratic National Committee in September 1984?

A I repeat my previous statement.

(The document referred to was marked Exhibit No. 8 for identification.)

BY MR. BERNSTEIN:

Q Exhibit 9 is a report of receipts and disbursements by the Democratic Congressional Dinner Committee, which, on the second page of the document,

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indicates a contribution by you.

Did you make a contribution of a thousand dollars to the Democratic Congressional Dinner Committee in April 1984?

A I repeat my previous statement.

(The document referred to was marked Exhibit No. 9 for identification.)

BY MR. BERNSTEIN:

Q Exhibit 10 is a report of Friends of Congressman Jerry Patterson for the period July through December 1983. On page 2 of the report, it reflects a contribution of $750 on September 13, 1983; and an aggregate year-to-date contribution of a thousand dollars.

Did you contribute a thousand dollars to the Patterson Committee during 1983, Mr. Stein?

A I repeat my previous statement.

(The document referred to was marked Exhibit No. 10 for identification.)

BY MR. BERNSTEIN:

Q Exhibit 11 is a report of receipts and disbursements by the John Kerry for the United States Senate Committee. On page 2 of the document, it reflects a contribution by you.

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Did you contribute five hundred dollars to the Kerry for Senate Committee in October 1984, Mr. Stein?

A I repeat my previous statement.

(The document referred to was marked Exhibit No. 11 for identification.)

BY MR. BERNSTEIN:

Q Exhibit 12 is a report of receipts and disbursements of the Cranston for President Committee for the month of November 1984, and reflects a contribution on the second page.

Did you contribute five hundred dollars to Cranston for President in 1984, November 1984?

A I repeat my previous statement.

(The document referred to was marked Exhibit No. 12 for identification.)

BY MR. BERNSTEIN:

Q Exhibit No. 13 is a report of receipts and disbursements for the Markey for Congress Committee for the period January 1985 through June 1985. On the first page, it reflects that the report contains activity for the 1984 primary and general election. On the second page of the document, it reflects a contribution by you, Mr. Stein.

Did you contribute five hundred dollars to

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the Markey for Congress Committee in March 1985?

A I repeat my previous statement.

(The document referred to was marked Exhibit No. 13 for identification.)

BY MR. BERNSTEIN:

Q In connection with what election was your contribution?

A I repeat my previous statement.

Q What other contributions did you make regarding the 1984 election cycle, Mr. Stein?

A I repeat my previous statement.

MR. BERNSTEIN: The record should reflect here, once again, the Commission's position that this violation, if any, took place more than three years ago, and, thus, any criminal prosecution on this basis would be barred by the statute of limitations contained in the FECA; but, Counsel, Mr. Medvene, has advised his client not to answer these questions, in any event.

I haven't misstated anything so far, have I?

MR. MEDVENE: We have made our statement before about the letter. We recently, within the last several weeks, received from the United States Attorney's Office, or a representative of Mr. Stein received it.

MR. BERNSTEIN: Mr. Medvene, am I right that

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you have not had any communications with the United States Attorney's Office?

MR. MEDVENE: Well, I would be glad to tell you that, if you tell me about your communications with them.

MR. BERNSTEIN: Well, I--

MR. MEDVENE: But I really don't want to get into a dialogue because it is his deposition. I have to get to court in Ventura, so I just want to complete. But, if want to complete, and, than, I will answer anything you want. I just want to complete with him.

In short, no; I have not had any.

BY MR. BERNSTEIN:

Q Mr. Stein, did you receive reimbursement for any contributions that you made in the 1984 election cycle?

A I repeat my previous statement.

MR. MEDVENE: I am sorry, could you repeat that? Did he receive--

MR. BERNSTEIN: --reimbursement for any contributions.

MR. MEDVENE: Thank you, I am sorry.

BY MR. BERNSTEIN:

Q Did you reimburse any individuals for their contributions during the 1984 election cycle?

A I repeat my previous statement.

9304355 4084

Q Turning to the 1988 election cycle, did you engage in activities in connection with Gary Hart's 1988 presidential campaign?

A I repeat my previous statement.

Q Do you engage in any fund raising activities?

A I repeat my previous statement.

Q Exhibit 14, Mr. Stein, is a report of receipts and disbursements by the Friends of Gary Hart 1988, which, on the second page of the document, reflects an in-kind contribution of food and beverages by you reported by the Committee in July 1986.

Did you make a contribution, an in-kind contribution, to the Committee, as is reflected in this report?

A I repeat my previous statement.

(The document referred to was marked Exhibit No. 14 for identification.)

BY MR. BERNSTEIN:

Q Please explain the circumstances of this contribution?

A I repeat my previous statement.

Q Was this contribution in connection with a fund raiser attended by the candidate?

A I repeat my previous statement.

2304350085

Q Mr. Stein, I earlier asked you if you were acquainted with an individual named Dennis Walto, and had also inquired about his involvement, to your knowledge, in the 1984 Gary Hart Campaign. To your knowledge, what position or function did he hold in the 1988 campaign?

A I repeat my previous statement.

Q When did that position or function commence to your knowledge?

A I repeat my previous statement.

Q Do you know of his connection, if any, with Stuart Karl, or any of the Stuart Karl's businesses?

A I repeat my previous statement.

MR. BERNSTEIN: Off the record for a second.

(Discussion off the record.)

MR. BERNSTEIN: On the record.

BY MR. BERNSTEIN:

Q Mr. Stein, I am going to read to you the names of several business firms. As to each of them, I would like you to tell us if you are familiar with them; and, if you are, to your knowledge what connection and relationship they have to Mr. Stuart Karl.

The firms are as follows: Visual Eyes; VIDOCM; Complete Productions; Continental Marketing Distributors; Promoview; Rewind Productions; KL Productions; Karl Duplicating Corp.; Karl Enterprises; Karl

2304350 40086

Record Corp.; Karl Entertainment Corp.; Karl Productions.

A I repeat my previous statement.

Q I ask the same question about any firms which are similar in name to these and are related in some fashion to Mr. Karl.

A I repeat my previous statement.

Q Are you familiar with any other business firms or enterprises related to Mr. Stuart Karl?

A I repeat my previous statement.

Q Are you familiar with a project undertaken by Mr. Karl called Hart Video?

A I repeat my previous statement.

Q What do you know about this project?

A I repeat my previous statement.

Q Who developed the project?

A I repeat my previous statement.

Q To your knowledge, who -- strike that.

Identify all the individuals who, to your knowledge, were involved in the project?

A I repeat my previous statement.

Q In regard to two of the business firms I had earlier listed, Visual Eyes and VIDCOM, if you are acquainted with them, please describe their relationship,if any, that, to your knowledge, they had to Mr. Douglas Rosen.

9304350 40087

A I repeat my previous statement.

Q Is there anything else you can remember about firms that I listed?

A I repeat my previous statement.

Q Is there anything else you can remember about Hart Video?

A I repeat my previous statement.

Q Can you remember what your previous statement was?

A Yes, I can.

MR. BERNSTEIN: Off the record for a second.

(Discussion off the record.)

MR. BERNSTEIN: On the record.

Our questions at this time are concluded; however, the deposition is a continuing one such that, if we have further questions, we will notify you, Mr. Stein, about another date to proceed, to continue.

I also would like to just recap the quick exchange that we had off the record, Mr. Medvene; and that is this:

As I indicated to you, the Commission ordinarily makes a determination, in the instance where an individual invokes the privilege against self-incrimination, about whether we think it is well-founded. And, I think, as I have explained to you both on and off

2304350408 8

the record, this is an instance where, because the matters in which Mr. Stein is so far a respondent, involved in the 1984 election cycle, we don't think that it is well-founded and will shortly have to determine whether or not to bring a subpoena enforcement action to request a District Judge to order the production of documents and, also, to answer the questions that we have propounded today. I say that only to inform you about what the ordinary process of our investigations do. I ask that you keep in touch with us if and when there comes a time that your position, with regard to that, changes.

MR. MEDVENE: I might just note for the record that we suggested to you off the record that, while we will try, we suggest, since you are an Agency of the United States Government, that you attempt to clarify the situation with the United States Attorney's Office and with the Department of Justice in Washington, whichever you think appropriate; and, if at all possible, the matter could be concluded. Mr. Stein would very much like to testify.

I would say one thing further. I assume that, if any court proceeding is contemplated, we will receive adequate notice so that we can appear. Because we assure you we want to appear to oppose any motion that you might make.

9304350089

MR. BERNSTEIN: Yes. These are not ex parte proceedings. They are -- the form of that, to my best understanding, is a notice to show cause why an order should not issue enforcing the subpoena.

MR. MEDVENE: All right. Let's hope we don't have to do that, and we will see where we are.

MR. BERNSTEIN: Let me also, in closing, state that the Commission's investigation by our stature are confidential; and, that, not notice should be given of those investigations. And, again, that we do hope to possible hear from you, Mr. Medvene, if the time comes that your position changes; and, on the other hand, that we will give sufficient notice if the time comes that we feel the need to recall Mr. Stein for further questions.

MR. MEDVENE: All right.

I would just ask that, if you are not able to make any headway with the Justice Department, to obviate the need for a court proceeding, we would like the opportunity to speak to whoever, along with you in your office. A court proceeding, at least as I understand the law, would be futile, unless you can show me some case. It seems to me it is pretty clear that their is no compulsion to testify if the Government says that Mr. Stein is the subject. I will be glad to look at anything you want to show us. We don't want to unduly go to court or burden

9304350400900

you. It seems to me it is just that clear.

MR. BERNSTEIN: Yes. I think at this point we had sufficient discussions back and forth so that we understand each other, and I think that that is the way we will have to leave it.

MR. MEDVENE: We very much appreciate your courtesy.

Thank you, very much.

MR. BERNSTEIN: Thank you.

Off the record.

(Thereupon, the deposition was adjourned sine die at 12:00 noon.)

DAVID FRANKLYN STEIN

Subscribed and sworn to before me this 16th day of June, 1988.

Judith Wyatt
Notary Public

My Commission Expires 7-29-88

OFFICIAL SEAL
JUDITH WYATT
Notary Public California
ORANGE COUNTY
My Commission Expires July 29, 1988

9304350 40921

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I, Harry Attmore, a Notary Public for the State of California, certify:

At the time and place therein set forth in the foregoing transcript, the witness, David Franklyn Stein was put on oath by me.

IN WITNESS WHEREOF, I have subscribed my name and affixed my seal this 25th day of April, 1988.

Harry Attmore

NOTARY PUBLIC IN AND FOR THE STATE OF CALIFORNIA

OFFICIAL SEAL
HARRY ATTMORE
NOTARY PUBLIC - CALIFORNIA
LOS ANGELES COUNTY
My Comm. Expires Nov 6, 1989

2304353 0092

To The Witness

This proceeding is known as a deposition. The person transcribing the proceeding is a Certified Shorthand Reporter, who is also a Notary Public and has placed you under oath. During the course of this proceeding I, and perhaps other of the counsel present here today, will be asking you questions pertaining to this matter.

Although this proceeding is being held in an informal atmosphere, since you have been placed under oath, your testimony here today has the same force and effect and is subject to the same penalties as if you were testifying in a courtroom before a judge. Specifically, you are subject to the penalty of perjury. Perjury is defined as "willfully, and contrary to an oath administered, stating as true any material fact which one knows to be false." You are advised that an unqualified statement of that which you do not know to be true is equivalent to a statement of that which you know to be false.

If, at any time during the deposition, you feel that a question is ambiguous, that you are unable to understand a question, or you fail to hear the question for any reason whatsoever, please tell the person asking you the question. If you do not so indicate, it will be presumed that you have heard and have understood each question and that your answer to each question is based upon your complete and full understanding thereof. If, after a question has been posed to you, you have any question yourself relating to what has been inquired about,

Exhibit #1
MUR 2583
witness: STEIN 4/25/88 Los Angeles, CA

2304350409 3

please tell the person who posed the question before you answer the question.

The reporter is only able to transcribe audible responses, so please do not nod your head, shake your head, or say "ahha, haah." Further, the reporter can usually record the words of only one person speaking at a time, so plese allow time for the questions to be completed before you respond. You will normally be allowed to finish each and every answer before a new question is posed.

At the conclusion of this deposition, the reporter will transcribe these proceedings into a booklet form, and you will have an opportunity to read that booklet and make any changes in your testimony that you feel are necessary. However, if you do make changes in your testimony, as it is given here today, I will be entitled to ask you why you made such changes. Because of that fact, it is important that all of your answers be full, complete and correct.

If I ask you about any conversations you have had in the past and you are unable to recall the exact words used in the conversation, you may state that you are unable to recall those exact words and then you may give me the gist or substance of any such conversation, to the best of your recollection. If you recall only part of a conversation or only part of an event, you are requested to give me your best recollection of those events or parts of conversation that you recall. If I ask you whether you have any information upon a particular subject, and you have

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overheard other persons conversing with each other regarding it or have seen correspondence or documentation regarding it, please tell me that you have such information and indicate the source, either a conversation or documentation or otherwise, from which you derived such knowledge. In answering, please do not be concerned with whether or not your answer is hearsay or concern yourself with any technical rules of evidence you think may preclude answering.

Our purpose here today is not to trap you or to trick you in any manner, but simply to ascertain and discover that information about the facts concerning this investigation that you have within your knowledge.

At the conclusion of this deposition, the attorneys present may, by agreement, stipulate that you sign the booklet containing your testimony in the presence of any notary public, rather than the reporter who is here today, taking and transcribing this deposition. If we do so agree, it will be upon the expressed understanding, and your promise, that you will, upon receipt of this deposition, promptly and as expeditiously as possible, read it, correct it if you feel necessary, and sign it in the presence of a notary public and return it to the office from which it was sent to you.

Do you understand everything that you have just read?

Yes _____ No _____

9304354095

Do you have any questions pertaining to either the procedure or what is about to transpire, insofar as this deposition is concerned? If so, please ask them now of me.

Please indicate that you have read [redacted] all of the foregoing, by signing this document where indicated below.

David F. Skin

Signature of Deponent

Exhibit 1 to the deposition of David Skin,
taken on April 25, 1988.

9304350406

REPORT OF RECEIPTS AND DISBURSEMENTS

Dukakis, Inc.

COMMITTEE SUMMARY OF RECEIPTS AND DISBURSEMENTS

6. COVERING PERIOD	From: February 1, 1984	Through: February 29, 1984

SUMMARY	6. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD	2,592.61
	7. TOTAL RECEIPTS THIS PERIOD (From Line 22 Column A)	986,610.40
	8. SUBTOTAL (Add Lines 6 and 7)	989,130.31
	9. TOTAL DISBURSEMENTS THIS PERIOD (From Line 39 Column A)	992,856.60
	10. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 9 from 8)	(3,726.29)
	11. DEBTS AND OBLIGATIONS OWED TO THE COMMITTEE (Itemize All on Schedule C or Schedule D)	81,000.00
	12. DEBTS AND OBLIGATIONS OWED BY THE COMMITTEE (Itemize All on Schedule C or Schedule D)	1,309,884.00
	13. EXPENDITURES SUBJECT TO LIMITATION (From Line 39, Line 9)	2,951,781.32
NET YEAR-TO-DATE CONTRIBUTIONS AND EXPENDITURES	14. NET CONTRIBUTIONS (Enter Year Losses) (Subtract Line 39 Column A from 17b Column B)	460,998.46
	15. NET OPERATING EXPENDITURES (Subtract Line 39 Column A from 39 Column B)	931,028.38

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

TYPE OR PRINT NAME OF TREASURER
Michael L. Myers

SIGNATURE OF TREASURER
Michael L. Myers

DATE
March 20, 1984

NOTE: Submission of false, incomplete or misleading information may subject the person signing this Report to the penalties of 2 U.S.C. 437g.
All previous versions of FEC Form 3P are obsolete and should no longer be used.

For further information, contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-376-3120

FEC Form 3P (1982)

EXHIBIT 2
MUR 2583
4/25/88
W. STEIN

(HA)

PERSONS WITH NAME, ADD.

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

[illegible] Dodds 29982 Ivy Glenn #100 Laguna Nigel, CA 92677	Sale/Leaseback - computer equipment			
		√Primary		
	Aggregate 20,000.00		2/21/84	20,000.00
Stuart Karl 899 West 16th Street Newport Beach, CA 92662	Sale/Leaseback - office furniture			
		√Primary		
	Aggregate 10,000.00		2/21/84	10,000.00
Subtotal of receipts this page				30,000.00
Unitemized amounts				19.12
Total this period				30,019.12

[illegible]

KARL PRODUCTION - CHECKING

		1	2	3	4	5	6
		DEPOSITS	TRANSFERS TO OTHER ACCOUNTS	CHECKS WRITTEN	INTEREST	S. CHGS	BALANCE
2/29/84	BAL FWD						29595
3/30	S. chg					6 -	28995
4/30	"					.75	
5/25	DEP. DAVID STEIN	30000 -					
5/25	S.C.					10 -	
5/29	DEP. TRS FROM KNC	22000 -					
5/31	S.C.					630	
5/25	ZIMMERMAN Galanty			22000 -			
5/29	" "			30000 -			27290

EXHIBIT 3
MUR 2583

4/25/88
W: STEIN

310036
Los Angeles (HA)

2304335 40999

STATEMENT OF ORGANIZATION

(see reverse side for instructions)

FEC

1. Full Name of Committee (in Full) — Check if name or address is changed.
Americans With Hart, Inc.

Full Address (Number and Street)
1670 Broadway, Suite 2500

Full City, State and ZIP Code
Denver, Colorado 80202

2. Date
April 15, 1983 3:21

3. FEC Identification Number
C00159251

4. Is this an amended Statement? ☒ YES ☐ NO

5. TYPE OF COMMITTEE (check one):

☒ (a) This committee is a principal campaign committee. (Complete the candidate information below.)

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

GARY W. HART	Democrat	President of the United States	
Name of Candidate	Candidate Party Affiliation	Office Sought	State/District

☐ (c) This committee supports/opposes only one candidate _____ and is NOT an authorized committee.
(name of candidate)

☐ (d) This committee is a _____ committee of the _____ Party.
(National, State or subordinate) (Democratic, Republican, etc.)

☐ (e) This committee is a separate segregated fund.

☐ (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

6. Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship
NONE		

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

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

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

Full Name	Mailing Address and ZIP Code	Title or Position
Michael R. Moore	1670 Broadway, Suite 2500 Denver, CO 80202	Treasurer (303) 831-9500

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

Full Name	Mailing Address and ZIP Code	Title or Position
Michael R. Moore	1670 Broadway, Suite 2500 Denver, CO 80202	Treasurer (303) 831-9500

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

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
United Bank of Denver	1740 Broadway, Denver, CO 80217
First American Bank	444 N. Capitol St., N.W. Washington, DC 20001
Patriot Bank/Brookline Trust	6 Beacon Street, Boston, MA 02108

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

Michael R. Moore	Michael R. Moore	4/13/83
Type or Print Name of Treasurer	SIGNATURE OF TREASURER	Date

NOTE [illegible] 18 U.S.C. §437[illegible]

For further information contact [illegible] (202) [illegible]-4063

FEC FORM 1 (3/80)

Witness: STEIN EXHIBIT 4 4/25/88

AMERICANS WITH HART, INC.

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Mr. Theodore Sorensen 25 Central Park W. New York, NY 10022	Paul, Weiss, Rifkind, Et. al. Attorney		✓Primary		
	Aggregate	400.00		3/03/83	400.00
Mr. John W. Sperling 6051 N. Brookline #131 Oklahoma City, OK 73112	Information Requested Information Requested		✓Primary		
	Aggregate	250.00		1/10/83	250.00
Mrs. Gail Sperling 6051 N. Brookline #131 Oklahoma City, OK 73112	Homemaker Homemaker		✓Primary		
	Aggregate	250.00		1/10/83	250.00
Mr. Geoffrey L. Stack 259 Morning Cyn Rd. Corona Del Mar, CA 92625	Regis Homes Corp. President		✓Primary		
	Aggregate	500.00		3/21/83	500.00
Mr. Peter Stamelman ICM 40 W. 57th St., #18 New York, NY 10019	ICM Executive		✓Primary		
	Aggregate	250.00		3/03/83	250.00
Ms. Barbara A. Stanmer P.O. Box 2603 Las Cruces, NM 88004	B & B Consultant Consultant		✓Primary		
	Aggregate	250.00		2/02/83	250.00
Mr. Benjamin Stapleton 1675 Broadway #2600 Denver, CO 80202	Ireland, Stapleton, & Pryor Attorney		✓Primary		
	Aggregate	1,000.00		7/21/82	1,000.00
Mr. David F. Stein 18071 Fitch Irving, CA 92714	Stein-Brief Group Developer		✓Primary		
	Aggregate	1,000.00		12/08/82	1,000.00
Subtotal of receipts this page					3,900.00

REPORT OF RECEIPTS AND DISBURSEMENTS

For a Political Committee Other Than an Authorized Committee

(Quarterly Report)

RECEIVED FEC
MAR 26 P 1:28

ALIGN AREA

ALIGN AREA

1. Name of Committee (In Full)

DNC Services Corporation/
Democratic National Committee

Address (Number and Street)

1625 Massachusetts Ave., N.W.

City, State and ZIP Code

Washington, D.C. 20036

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C00010603

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)

4. TYPE OF REPORT (Check appropriate box(es))

(a)
☐ April 15 Quarterly Report
☐ October 15 Quarterly Report
☐ July 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-Election Year Only)
☒ Monthly Report for February, 1984
☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
☐ Thirtieth day report following the General Election on _____ in the State of _____
☐ Termination Report

(b) Is this Report an Amendment?
☐ YES ☒ NO

SUMMARY

5. Covering Period 2/1/84 through 2/29/84

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on hand January 1, 19 84		$ 340,456.11
(b) Cash on Hand at Beginning of Reporting Period	$ 476,204.23	
(c) Total Receipts (from Line 18)	$ 1,394,014.27	$ 2,698,151.82
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 1,870,218.50	$ 3,038,607.93
7. Total Disbursements (from Line 28)	$ 1,474,774.69	$ 2,643,164.12
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 395,443.81	$ 395,443.81
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ 6,025,551.88	

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

Paul G. Kirk, Jr.
Type or Print Name of Treasurer

Paul G. Kirk, Jr.
SIGNATURE OF TREASURER

March 20, 1984
Date

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

NOTE: Numbers in brackets [ ] refer to corresponding lines on the Detailed Summary Page.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

FEC FORM 3X (1-84)

Exhibit 5
4/25/88
witness: STEIN (HA)

ITEMIZED RECEIPTS
DNC SERVICES CORPORATION / DEMOCRATIC NATIONAL COMMITTEE
SCHEDULE A LINE 11A

NAME ADDRESS CITY ST ZIP	OCCUPATION EMPLOYER	DATE	AMT THIS PERIOD	AGGREGATE YEAR TO DATE
MR HARVEY W SCHIEBEL 7326 CAMERRA DR LOS ANGELES CA 90068	PRODUCER SELF-EMPLOYED	040280	$500.00	$500.00
MR MELVIN L SCHNEITZER 141 E 88TH ST NEW YORK NY 10128	ATTORNEY ROGERS & WELLS	040280	$500.00	$500.00
MR JOLYN SELLERS 6344 PEND APPLE RD BOCA RATON FL 33433	INVESTMENT BANK PRUDENTIAL-BACHE SEC	040280	$1,000.00	$1,000.00
MS ESTHER N SHAPIRO 619 N ALTA DR BEVERLY HILLS CA 90210	CREATOR/PRODUCE SELF-EMPLOYED	040280	$1,000.00	$1,000.00
MR WENDY SHEPARD 1110 19TH ST 3 SANTA MONICA CA 9[illegible]403	VICE PRESIDENT CALIF DEPT OF TAX AD	040280	$1,000.00	$1,000.00
MR MAURICE SONNENBERG 540 5TH AVE NEW YORK NY	SELF-EMPLOYED	040280	$1,000.00	$1,000.00
MR ERIC SPECTOR 521 5TH AVE NEW YORK NY 10016	PRESIDENT PARK PHOTOS	040281	$5,000.00	$5,000.00
MR DAVID STEIN SUITE 500 9000[illegible] DEV GLENN LAGUNA NIGUEL CA 92677	PRESIDENT STEIN [illegible] GROUP	040283	$1,000.00	$1,000.00
MS Anne Taft Route 2 Box 213 Dinwiddie VA 23841	INFORMATION REQ	040284	$5,000.00	$5,000.00
MR Harry Tamoyan 6200 Beechwood Rd Baltimore MD 21239	INFORMATION REQ	040283	$500.00	$500.00

Exhibit 6

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

(Summary Page)

RECEIVED BY THE FEC
84 JUN 20 PM 12:48

ALIGN AREA

1 Name of Committee (In Full)

DNC Services Corporation
Democratic National Committee

Address (Number and Street)

1625 Massachusetts Ave., N.W.

City, State and ZIP Code

Washington, D.C. 20036

☐ Check here if address is different than previously reported.

2. FEC Identification Number
C00010603

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)

4. TYPE OF REPORT (Check appropriate boxed)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report
☐ July 15 Quarterly Report ☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-Election Year Only)
☒ Monthly Report for May 1984
☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
☐ Thirtieth day report following the General Election on _____ in the State of _____
☐ Termination Report

(b) Is this Report an Amendment?
☐ YES ☒ NO

SUMMARY

5. Covering Period 5/1/84 through 5/31/84

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on hand January 1, 19 84		$ 340,456.11
(b) Cash on Hand at Beginning of Reporting Period	$ 369,053.23	
(c) Total Receipts (from Line 18)	$ 1,097,207.97	$ 6,366,948.85
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 1,466,261.20	$ 6,707,404.96
7. Total Disbursements (from Line 28)	$ 1,048,794.66	$ 6,289,938.42
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 417,466.54	$ 417,466.54
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ 5,369,365.83	

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

Paul G. Kirk, Jr.
Type or Print Name of Treasurer

Paul G. Kirk, Jr.
SIGNATURE OF TREASURER

June 20, 1984
Date

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

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used

FEC FORM 3X (3-80)

EX. #6
MUR 2583
WITNESS: STEIN 4/25/88 (AA)

84031744779

SCHEDULED ACCOUNTS PAGE 11

UNC SERVICES CORPORATION/DEMOCRATIC NATIONAL COMMITTEE
SCHEDULE A LINE 11A

NAME ADDRESS CITY STATE ZIPCODE	OCCUPATION EMPLOYER	DATE	AMOUNT THIS PERIOD	YTD AGGREGATE
Mr. Edmund A Stanley JR Box 85 Oxford MD 21654	REQUESTED	5/08/84	350.00	350.00
Mrs. Marie C Steeg 2501 Virginia Ave N Washington DC 20037	REQUESTED	5/03/84	75.00	225.00
Mr. Martin P Stauffer 17 Pheasant Ln Bloomfield CT 06002	Accountant Stolnin Shapiro & Co	5/02/84	1,500.00	1,500.00
Mr. David P. Steege 19071 Fitch Avenue Irvine CA 92715	Developer Stein Brief	5/14/84	5,000.00	5,000.00
Mr. David Steinberg 13 Hastings Rd Massapequa NY 11758	REQUESTED	5/08/84	100.00	300.00

FEC

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

(Summary Page)

84 JUL 11 P2:22

ALIGN AREA

ALIGN AREA

1 Name of Committee (In Full)

DNC Services Corporation/
Democratic National Committee

Address (Number and Street)

1625 Mass. Ave., N.W.

City, State and ZIP Code

Washington, D.C. 20036

☐ Check here if address is different than previously reported.

2 FEC Identification Number

C00010603

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)

4. TYPE OF REPORT (Check appropriate boxes)

(a)
☐ April 15 Quarterly Report
☐ October 15 Quarterly Report
☐ July 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-Election Year Only)
☒ Monthly Report for June 1984
☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
☐ Thirtieth day report following the General Election on _____ in the State of _____
☐ Termination Report

(b) Is this Report an Amendment?
☐ YES ☒ NO

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5 Covering Period 6/1/84 through 6/30/84		
6 (a) Cash on hand January 1, 19 84		$ 340,456.11
(b) Cash on Hand at Beginning of Reporting Period	$ 417,466.54	
(c) Total Receipts (from Line 18)	$1,092,619.04	$ 7,459,567.89
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$1,510,085.58	$ 7,800,024.00
7 Total Disbursements (from Line 28)	$1,033,689.39	$ 7,323,627.81
8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 476,396.19	$ 476,396.19
9 Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$	
10 Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$5,173,236.30	

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

Paul G. Kirk, Jr.
Type or Print Name of Treasurer

SIGNATURE OF TREASURER

7/10/84
Date

For further information contact
Federal Election Commission
Toll Free 800/424-9530
Local 202/376-3120

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used

EXHIBIT 7. Ex. # 7
W. STEIN
4/25/88

HA

9103-00307

[redacted]

NAME / ADDRESS / CITY STATE ZIPCODE					
Mr. Herbert D Stanley 1515 Harding St Hollywood FL 33020	REQUESTED	6/10/84			
Ms. Anne Stark 321 So Russell Monterey Park CA 91754	REQUESTED	6/6. 84			
Ms. Kaela Stein 321 S Hillcrest 3B 328 Los Angeles CA 90048	REQUESTED	6/11/84			
Mr. David F. Stein 20071 Fitch Avenue Irvine CA 92715	Developer Stein Brief	6/04/84 6/04/84 6/04/84	$1000.00 10,000.00 101000.00	$4,000.00	
Mr. Hoff R Stenson 2500 Granbury Cir Longwood FL 32701	REQUESTED	6/21/84 6/01/84	98100 25000	219100 PA	

9304354107

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other than an Authorized Committee

(Summary Page)

ALIGN AREA

1. Name of Committee (In Full)
DNC Services Corporation/
Democratic National Committee

Address (Number and Street)
[illegible] Massachusetts Avenue, N.W.

City, State and ZIP Code
Washington, D.C. 20036

☐ Check here if address is different than previously reported.

2. FEC Identification Number
C00010603

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____

4. TYPE OF REPORT (Check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report
☐ July 15 Quarterly Report ☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non Election Year Only)
☒ Monthly Report for September 1984
☐ Twelfth day report preceding _____ (Type of Statement)
election on _____ in the State of _____
☐ Thirtieth day report following the General Election
on _____ in the State of _____
☐ Termination Report

(b) Is this Report an Amendment?
☐ YES ☒ NO

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period 9/1/84 through 9/30/84		
6. (a) Cash on hand January 1, 19 84		$ 340,456.11
(b) Cash on Hand at Beginning of Reporting Period	$ 711,092.75	
(c) Total Receipts (from Line 18)	$ 2,671,856.64	$ 13,450,380.50
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 3,382,949.39	$ 13,790,836.61
7. Total Disbursements (from Line 28)	$ 2,772,380.47	$ 13,180,267.69
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 610,568.92	$ 610,568.92
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ 3,511,270.63	

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

Paul G. Kirk, Jr.
Type or Print Name of Treasurer

Paul G. Kirk, Jr.
SIGNATURE OF TREASURER

October 19, 1984
Date

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

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

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

FEC FORM 3X (3/80)

A 4 0 3 3 1 2 2 1 4 6

Ex. # 8

EXHIBIT 8
W/ STEIN 4/25/88

MUR 2583
(HQ)

ITEMIZED RECEIPTS
DNC SERVICES CORPORATION/DEMOCRATIC NATIONAL COMMITTEE
SCHEDULE A LINE 11A

NAME ADDRESS CITY STATE ZIPCODE	OCCUPATION EMPLOYER	DATE	AMOUNT THIS PERIOD	YTD AGGREGATE
Mr. Robert M Stein 1107 Telford Rd Jenkintown PA 19570	RETIRED	9/17/84	50.00	225.00
Mr. Robert M Stein Jr 67 Leonard Street Stamford CT 06905	REQUESTED	9/11/84	100.00	210.00
Mr. David B. Stein 18071 Fitch Avenue Irvine CA 92715	Developer Stein Brief	9/28/84	1,000.00	15,000.00
Mr. Nathan L. Stein 9745 Walnut Drive Apt. 801 Ramsey City NJ 06116	REQUESTED	9/24/84	250.00	250.00
Ms. Katherine Steiner 1615 Park Ave San Francisco CA 94122	RETIRED CLERK HEBREW UNION SELF.	9/14/84	60.00	360.00

RECEIVED AT THE FEC

MAY 18 4:31

HAND DELIVERED

REPORT OF RECEIPTS AND DISBURSEMENTS

For a Political Committee Other Than an Authorized Committee

(Summary Page)

ALIGN AREA

1. Name of Committee (In Full)

Democratic Congressional Dinner Committee

Address (Number and Street)

Suite 319
400 North Capitol St., NW

City, State and ZIP Code

Washington, D.C. 20001

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C C00000182

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____

4. TYPE OF REPORT (Check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report

☐ July 15 Quarterly Report ☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-Election Year Only)

☒ Monthly Report for April 1984

☐ Thirty day report preceding _____ Report Election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____ in the State of _____

☐ Termination Report

(b) Is this Report an Amendment?

☐ YES ☒ NO

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period 4/1/84 through 4/30/84		
6(a) Cash on Hand January 1, 19 84		$ 14,656.29
(b) Cash on Hand at Beginning of Reporting Period	$ 171,179.46	
(c) Total Receipts (from Line 18)	$ 260,400.00	$ 699,840.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 431,579.46	$ 714,496.29
7. Total Disbursements (from Line 28)	$ 387,863.81	$ 670,780.64
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 43,715.65	$ 43,715.65
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$	

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

AIDEN J. KIRWAN

Type or Print Name of Treasurer

Aiden J. Kirwan

SIGNATURE OF TREASURER

May 18, 1984

Date

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

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

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

FEC FORM 3X (3/80)

EXHIBIT 9
MUR 2583
4/25/88
W; STEIN (HA)

NAME / MAILING ADDRESS	OCCUPATION / BUSINESS ADDRESS	SELF-EMPLOYED	EACH RECEIPT THIS PERIOD	DEPOSIT DATE	YEAR-TO-DATE AGGREGATE
[illegible], Stephen Mr. 640 Fifth Avenue New York NY 10022	Investor LBS Equation 640 Fifth Avenue New York NY 10022	YES	1,000.00	06-06-84	1,000.00
[illegible], Marvin F. Mr. 3515 Bromm Condo 114 Dallas TX 75219	President 3515 Bromm Condo 114 Dallas TX 75219		6,000.00	06-06-84	6,000.00
Sidhu, Ajaib Singh Mr. 521b Lamgate Road Columbia MD 21044	Medical Doctor 3009 Ingleside Avenue Baltimore MD 21228	YES	1,000.00	06-06-84	1,000.00
Sparks, R. H. Mr.	Executive Director Licensed Beverage Distributors 609 Perry Brooks Building Austin TX 78701		5,000.00	06-06-84	5,000.00
Stein, David F. Mr. [illegible] Jay Glenn Drive Suite 100 [illegible] Niguel CA 92677	President Stein-Brief Group Land Developers Laguna Niguel CA		1,000.00	06-30-84	1,000.00
Strachota, Rose Mrs. 8 Billard Road New London CT 06320	Homemaker 8 Billard Road New London CT 06320	YES	1,000.00	06-11-84	1,000.00
Stumpf, E. A. Mr. [illegible]83 Portshire Houston TX 77079	President/CEO Gas Conservation Systems 9900 Richmond Suite 2046 Houston TX 77042	YES	2,000.00	06-06-84	2,000.00
Taylor, Paul Mr. 400 West Second Roswell NM 88201	President Taylor & Taylor Realtors, Ltd. 200 West Second Street Post Office Box 344 Roswell NM 88201		200.00	06-11-84	200.00
Thomas, Joseph H. Mr. Post Office Box 4 Sinton TX 78387	Geologist Post Office Box 4 Sinton TX 78387		1,000.00	06-03-84	1,000.00
Thomases, Susan P. Ms. 929 Park Avenue New York NY	Attorney/Partner Willie, Farr & Gallagher 153 East 53rd Street 47th Floor New York NY 10022		1,000.00	06-06-84	1,000.00
Walton, Robert Mr. 56 Regina Road Fall River MA 02726	Contractor Walton Properties 10 Tobin Street Fall River MA 02722	YES	1,000.00	06-30-84	[illegible]
Vandergriff, Tom The Honorable Post Office Box 1460 Arlington TX 76004	Congressman U. S. House of Representatives Washington DC 20515		2,000.00	06-06-84	[illegible]

[redacted]

(Summary Page)

1. Name of Committee (In Full)
Friends of Congressman Jerry Patterson

2. FEC Identification Number
[redacted]

Address (Number and Street)
3200 Park Center Drive, Suite 710

3. Is this Report an Amendment?
☐ YES ☒ NO

City, State and ZIP Code
Costa Mesa, California 92626

If address is different than previously reported.

4. TYPE OF REPORT

- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☒ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Twelfth day report preceding election on _____ in the State of _____
- ☐ Thirtieth day report following the General Election on _____ in the State of _____
- ☐ Termination Report

This report contains activity for – ☐ Primary Election ☐ General Election ☐ Special Election ☐ Runoff Election

SUMMARY

	[redacted]	[redacted]
5. Covering Period 7/1/83 Through 12/31/83		
6. Net Contributions (other than loans):		
(a) Total Contributions (other than loans) (from Line 11e)	$ [illegible],844.00	$ 114,537.74
(b) Total Contribution Refunds (from Line 28d)	$ -0-	$ -0-
(c) Net Contributions (other than loans) (Subtract Line 6b from 6a)	$ 68,344.00	$ 114,537.74
7. Net Operating Expenditures:		
(a) Total Operating Expenditures (from Line 17)	$ 48,248.54	$ 84,978.55
(b) Total Offsets to Operating Expenditures (from Line 14)	$ 14.35	$ 14.35
(c) Net Operating Expenditures (Subtract Line 7b from 7a)	$ 48,234.19	$ 84,964.20
8. Cash on Hand at Close of Reporting Period (from Line 27)	$ 39,719.38	[redacted]
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	$	[redacted]
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ 2,500.00	[redacted]

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

For further information, contact:
Federal Election Commission
Toll Free [redacted]
Local [redacted]

Joan Hayes
Type or Print Name of Treasurer

Joan Hayes
SIGNATURE OF TREASURER

1/30/84
Date

EXHIBIT 10

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

All previous versions of FEC FORM 3 and FEC FORM 3x are obsolete and should no longer be used.

FEC FORM 3 (1983)

W. STEIN MUR 2583 4/25/88

HA

0401235292

840-2523570

Friends of Congressman Jerry Patterson

A. Full Name, Mailing Address and ZIP Code Willa Dean Lynn 929 Via Lido Soud Newport Beach, CA 92663 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Homewide Occupation Amount This Period	Date (month, day, year) 10/26/83	Amount of Each Receipt This Period 250.00
B. Full Name, Mailing Address and ZIP Code Howard H. Larsen 407 Kings Place Newport Beach, CA 92663 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Management Consultants International Occupation Vice-President Amount This Period 750.00	Date (month, day, year) 9/31/83	Amount of Each Receipt This Period 750.00
C. Full Name, Mailing Address and ZIP Code John D. Lusk P. O. Box C 19560 17550 Gillette Ave. Irvine, CA 92713 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer John D. Lusk Co. Occupation President Amount This Period 1,000.00	Date (month, day, year) 9/23/83	Amount of Each Receipt This Period 750.00
D. Full Name, Mailing Address and ZIP Code Irvin Schatzman 17265 Los Pintos Circle Fountain Valley, CA 92708 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Carma-Sandling Group Occupation Senior Vice President Amount This Period 1,000.00	Date (month, day, year) 9/10/83	Amount of Each Receipt This Period 750.00
E. Full Name, Mailing Address and ZIP Code David F. Stein 18071 Fitch Avenue Irvine, CA 92715 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Stein-Brief Group Occupation Partner Amount This Period 1,000.00	Date (month, day, year) 9/13/83	Amount of Each Receipt This Period 750.00
F. Full Name, Mailing Address and ZIP Code John C. Curtin 2721 Via Verbena San Clemente, CA 92672 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Mgmt. Cons. Inter. Occupation President Amount This Period 750.00	Date (month, day, year) 9/30/83	Amount of Each Receipt This Period 750.00
G. Full Name, Mailing Address and ZIP Code William Royer 1747 Penn. Ave. NW Washington, D. C. 20006 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Royer & Shacknai Attorneys at Law Occupation Attorney Amount This Period 500.00	Date (month, day, year) 10/27/83	Amount of Each Receipt This Period 500.00
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page only this entry only)			

2 S8315
MA Dem C1565

REPORTS OF RECEIPTS AND DISBURSEMENTS
For Authorized Committee

SECRETARY OF THE SENATE
1984 DEC 5 PM 2:23

(Primary Post)

ALPHA AREA | ALPHA AREA

1 Name of Committee (in Full)
John Kerry for United States Senate Committee

2 FEC Identification No. C00[illegible]
H.D

Address (Number and Street)
5 Doane Street, 2nd Floor

3 Is this Report an Amendment?
☐ YES ☒ NO

City, State and ZIP Code
Boston, MA 02109

☐ Check if address is different than previously reported

4 TYPE OF REPORT

- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
- ☒ Thirtieth day report following the General Election on 11/6/84 in the State of Massachusetts
- ☐ Termination Report

This report contains activity for – ☐ Primary Election ☒ General Election ☐ Special Election ☐ Runoff Election

SUMMARY

5 Covering Period 10/18/84 through 11/26/84

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6 Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (From Line 11 (e))	$ 681,557.17	$1,814,313.32
(b) Total Contribution Refunds (from Line 28 (d))	0.00	0.00
(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))	681,557.17	1,814,313.32
7 Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	714,738.57	1,988,942.36
(b) Total Offsets to Operating Expenditures (from Line 14)	0.00	24,104.66
(c) Net Operating Expenditures (Subtract Line 7 (b) from 7 (a))	714,738.57	1,964,837.70
8. Cash on Hand at Close of Reporting Period (from Line 27)	146,475.72	
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	0.00	
*10 Debts and Obligations Owed BY The Committee (Itemize all on Schedule C or Schedule D)	401,176.65	

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

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

Wesley E. Finch
Type or Print Name of Treasurer

Signature of Treasurer

12/3/84
Date

EXHIBIT 11
MUR 2583
W. STEIN

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

All previous versions of FEC FORM 3 and FEC FORM 3b are obsolete and should no longer be used.

FEC FORM 3 (1/88) 4/25/88

Contributor Mailing Address	Employer/Occupation/Aggr$	Date	$ Amount
Stephen Stamis 325 Evandale Road Scarsdale, NY 10583 _Prim ✓Genl _Othr _____	Exxon Corporation Vice President Aggr YTD $ 250.00	11/04/84	$ 250.00
Jason E Starr 21 Mud Hill Road Newton, MA 02155 _Prim ✓Genl _Othr _____	Self Employed Boston Showcase Co. Aggr YTD $ 200.00	10/31/84	$ 200.00
Thomas K Steel Jr 55 Shermans Waye Marshfield, MA 02050 _Prim ✓Genl _Othr _____	New England Cable Vice Pres/Gen Counsel Aggr YTD $ 250.00	11/02/84	$ 250.00
Barry A Stein 6 Channing Place Cambridge, MA 02138 _Prim ✓Genl _Othr _____	Self Employed Management Consultant Aggr YTD $ 250.00	10/27/84	$ 250.00
David F Stein 29982 Ivy Glenn Drive Suite 100 Laguna Niguel, CA 92677 _Prim ✓Genl _Othr _____	The Stein-Brief Group President Aggr YTD $ 500.00	10/30/84	$ 500.00
Kay E Stein 19 Druid Hill Road Newton Highlands, MA 021 _Prim ✓Genl _Othr _____	Boston Center for Adult Ed Archeologist Aggr YTD $ 300.00	10/30/84	$ 250.00
Stanton L Stein 236 Hickory Road Sant Monica, CA 90402 _Prim ✓Genl _Othr _____	 Aggr YTD $ 250.00	10/25/84	$ 250.00

RECEIVED AT THE FEC

84 DEC 21 P2:30

OFFICIAL OF RECEIPTS AND DISBURSEMENTS
BY AN AUTHORIZED COMMITTEE OF A
CANDIDATE FOR THE OFFICE OF PRESIDENT

Citizens for President Committee, Inc.

1120 17th Street, Suite 400

Washington | D.C. | 20036

C00158782

Primary ☐ General ☐

☐ Termination Report

COMMITTEE SUMMARY OF RECEIPTS AND DISBURSEMENTS

6. COVERING PERIOD: FROM 11/01/84 THROUGH 11/30/84

SUMMARY	6. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD	21,080.49
	7. TOTAL RECEIPTS THIS PERIOD (From Line 20 Column A)	62,196.00
	8. SUBTOTAL (Add Line 6 and 7)	83,276.49
	9. TOTAL DISBURSEMENTS THIS PERIOD (From Line 29 Column A)	65,255.29
	10. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 9 from 8)	18,021.20
	11. DEBTS AND OBLIGATIONS OWED TO THE COMMITTEE (Itemize All on Schedule C or Schedule D)	
	12. DEBTS AND OBLIGATIONS OWED BY THE COMMITTEE (Itemize All on Schedule C or Schedule D)	1,227,924.78
	13. EXPENDITURES SUBJECT TO LIMITATION (From FEC Form 3Z, Part 4)	4,310,677.11
NET YEAR-TO-DATE CONTRIBUTIONS AND EXPENDITURES	14. NET CONTRIBUTIONS (Other than Loans) (Subtract Line 28d Column B from 17b Column B)	1,023,120.57
	15. NET OPERATING EXPENDITURES (Subtract Line 28b Column B from 23 Column B)	1,620,886.56

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

TYPE OR PRINT NAME OF TREASURER
William Landau, Treasurer/Sue Paschen, Agent

SIGNATURE OF TREASURER | DATE

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.
All previous versions of FEC Form 3P are obsolete and should no longer be used.

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

FEC Form 3P (2/83)

EXHIBIT 12
WEISTEIN 4/25/88 (HA)

8 4 0 3 3 3 1 3 4 8 9

SCHEDULE A-P

STERLING RECAPITAL
FOR PERIOD
11/01/84 TO 11/30/84

CHANGSTON FOR PRESIDENT, INC

FULL NAME AND ADDRESS	PLACE OF BUSINESS	OCCUPATION	[illegible]
MORSE MS. SUSAN L 123 GEORGINA AVE #10 SANTA MONICA CA 90402			PRIMARY [illegible] $ [illegible]
			AGGREGATE YEAR TO DATE $ [illegible]
RIEDLING MR. ANDRE A 6000 BERNEIL LA PARADISE VALLEY AZ 85253			PRIMARY [illegible] $ [illegible]
			AGGREGATE YEAR TO DATE $ [illegible]
ROVACK MRS. MARY V 329 W EL CAMINO DR PHOENIX AZ 85021			PRIMARY [illegible] $ [illegible]
			AGGREGATE YEAR TO DATE $ [illegible]
PETRASEK MR. MARTIN 9229 SUNSET BLVD STE 616 LOS ANGELES CA 90069			PRIMARY [illegible] $ [illegible]
			AGGREGATE YEAR TO DATE $ [illegible]
APPD MR. JOHN W 7610 GIRARD AVE STE 200 LA JOLLA CA 92037			PRIMARY [illegible] $ [illegible]
			AGGREGATE YEAR TO DATE $ [illegible]
SAUTER MR. MARK S 4100 MAC ARTHUR BLVD NEWPORT BEACH CA 92660			PRIMARY [illegible] $ [illegible]
			AGGREGATE YEAR TO DATE $ [illegible]
SCHOUT MR. ROBERT L 737 BAYWOOD NEWPORT BEACH CA 92660			PRIMARY [illegible] $ [illegible]
			AGGREGATE YEAR TO DATE $ [illegible]
SHELTON MR. ROBERT M 500 NEWPORT CENTER DR NEWPORT BEACH CA 92660			PRIMARY [illegible] $ [illegible]
			AGGREGATE YEAR TO DATE $ [illegible]
STEIN MR. DAVID P 29982 IVY GLENN DR STE 100 LAGUNA NIGUEL CA 92677			PRIMARY [illegible] $ [illegible]
			AGGREGATE YEAR TO DATE $ [illegible]

MARKET FOR CONGRESS COMMITTEE

P. O. Box [illegible]

Boston, MA 02114

TYPE OF REPORT

- [ ] April 15 Quarterly Report
- [ ] July 15 Quarterly Report
- [ ] October 15 Quarterly Report
- [ ] January 31 Year End Report
- [x] July 31 Mid Year Report (Non-election Year Only)
- [ ] Twelfth day report preceding ____ election on ____ in the State of ____
- [ ] Thirtieth day report following the ____ election on ____ in the State of ____
- [ ] Termination Report

This report contains activity for – [x] 1984 Primary Election [x] 1984 General Election [ ] Special Election [ ] Runoff Election

SUMMARY

8. Covering Period 1/1/85 through 6/30/85

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (From Line 11 (d))	$151,338.13	$151,338.13
(b) Total Contribution Refunds (From Line 20 (d))	300.00	300.00
(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))	151,038.13	151,038.13
7. Net Operating Expenditures		
(a) Total Operating Expenditures (From Line 17)	$7,152.94	$7,152.94
(b) Total Offsets to Operating Expenditures (From Line 18)	4,837.64	4,837.64
(c) Net Operating Expenditures (Subtract Line 7 (b) from 7 (a))	$2,315.30	$2,315.30
8. Cash on Hand at Close of Reporting Period (From Line 27)	37,481.42	
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	---	
10. Debts and Obligations Owed BY The Committee (Itemize all on Schedule C or Schedule D)	$5,495.32	

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

Patricia M. Chisholm

Type or Print Name of Treasurer

Patricia M. Chisholm July 15, 1985

SIGNATURE OF TREASURER DATE

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

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

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

FEC FORM 3 (1980)

EXHIBIT 13
MUR 2585
W. STEIN
4/25/88
Los Angeles
(AA)

8501225112

MONEY FOR CONGRESS COMMITTEE

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt this Period
Charles H. Spaulding 12 Seaborn Place Lexington, MA 02173 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	self real estate Aggregate Year-to-Date $	6/19/85	$ 500.00
David F. Stein 29982 Ivy Glenn Laguna Niguel, CA 92677 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Stein Brief Group developer Aggregate Year-to-Date $ 500.00	3/18/85	500.00
J. Gordon Stephens 4700 N. 38th Place Arlington, VA 22207 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Akin, Gump, Strauss, Hauer & Feld attorney Aggregate Year-to-Date $ 250.00	3/28/85	250.00
S. Allyn Stewart 117 S. Doheny Drive Los Angeles, CA 90048 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Warner Bros. producer Aggregate Year-to-Date $ 200.00	3/18/85	200.00
Michael P. Sullivan 1314 Salem Street Malden, MA 02148 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	A&A Window Products President Aggregate Year-to-Date $ 1,000.00	6/17/85	1,000.00
Antonio J. Tambone 2 Main Street Stoneham, MA 02180 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Tambone Corporation real estate developer Aggregate Year-to-Date $ 650.00	3/18/85 6/19/85	150.00 500.00
Peter Tannenwald 3910 Garrison St., N.W. Washington, D.C. 20016 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Arent, Fox, Kintner attorney Aggregate Year-to-Date $ 250.00	3/27/85	250.00
(SUBTOTAL of Receipts This Page (optional))			
TOTAL This Period (last page this line number only)			

85012535565

FEC Form 3P, Page 1
Federal Election Commission
1328 K Street, N.W.
Washington, D.C. 20463

REPORT OF RECEIPTS AND DISBURSEMENTS BY AN AUTHORIZED COMMITTEE OF A CANDIDATE FOR THE OFFICE OF PRESIDENT

87 JUL 17 A8:52

NOTE: *This report is to be used by an authorized committee of a candidate seeking nomination or election to the Office of President or Vice President of the United States whether or not public funds are used.*

1. NAME OF COMMITTEE IN FULL
FRIENDS OF GARY HART-1988, INC.

2. IDENTIFICATION NUMBER
C00214452

ADDRESS (Number and Street)
707 17th Street, Suite 3800

CITY: Denver | STATE: Colorado | ZIP CODE: 80202 | ☐ Check if name or address is changed

3. IS THIS REPORT OF RECEIPTS AND DISBURSEMENTS FOR:
☒ Primary ☐ General

4. TYPE OF REPORT ("X" appropriate box and complete, if applicable)
- ☐ Amendment for (Report) _____
- ☐ Monthly Report (month) _____
- ☐ April 15 Quarterly Report
- ☐ January 31 Year-end Report
- ☒ July 15 Quarterly Report
- ☐ Termination Report
- ☐ October 15 Quarterly Report
- ☐ Twelfth Day Before Election
- ☐ Thirtieth Day After Election

TYPE OF ELECTION
STATE | ELECTION DATE

COMMITTEE SUMMARY OF RECEIPTS AND DISBURSEMENTS

5. COVERING PERIOD — FROM: Inception — THROUGH: June 30, 1987

SUMMARY	6. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD	0.00
	7. TOTAL RECEIPTS THIS PERIOD (From Line 22 Column A)	2,192,377.68
	8. SUBTOTAL (Add Line 6 and 7)	2,192,377.68
	9. TOTAL DISBURSEMENTS THIS PERIOD (From Line 30 Column A)	2,069,305.73
	10. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 9 from 8)	123,071.95*
	11. DEBTS AND OBLIGATIONS OWED TO THE COMMITTEE (Itemize All on Schedule C or Schedule D)	12,381.00
	12. DEBTS AND OBLIGATIONS OWED BY THE COMMITTEE (Itemize All on Schedule C or Schedule D)	99,372.87
	13. EXPENDITURES SUBJECT TO LIMITATION (From FEC Form 3P, Page 4)	1,085,576.91
NET YEAR-TO-DATE CONTRIBUTIONS AND EXPENDITURES	14. NET CONTRIBUTIONS (Other than Loans) (Subtract Line 28d Column B from 17e Column B)	2,133,916.07
	15. NET OPERATING EXPENDITURES (Subtract Line 20a Column B from 23 Column B)	1,085,576.91

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

TYPE OR PRINT NAME OF TREASURER
Michael R. Moore

SIGNATURE OF TREASURER
Michael R. Moore

DATE
July 15, 1987

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

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.
All previous versions of FEC Form 3P are obsolete and should no longer be used.

FEC Form 3P (2/83)

*Includes $101,440.10 held by the U.S. District Court of Colorado, pending resolution of claims by creditors of Americans With Hart, Inc.

witness: STEIN 4/25/88 EXHIBIT 14 Los Angeles

FRIENDS OF GARY HART -- 1988, INC.

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

LINDA SPANGLER 2317 S. JACKSON DENVER, CO 80210	Salary Salary Salary Salary Primary	03/17/87 04/15/87 05/07/87 05/07/87	341.87 341.87 341.87 341.87
STANHOPE 995 FIFTH AVENUE NEW YORK, NY 10028	Travel/Subsistence Primary	05/05/87	1,049.92
STATE FARM INSURANCE MOUNTAIN STATES OFFICE 3001 8TH AVENUE GREELEY, CO 80638-0001	Insurance Primary	03/13/87	349.00
MR. DAVID F. STEIN 29982 IVY GLENN DR. LAGUNA NIGUEL, CA 92677 07/01/86 In-kind contribution of Food/Beverages	Food/Beverages Primary	07/01/86	250.00
ANDREW STEIN 4139 VIA MARINA #510 MARINA DEL REY, CA 90291	Travel/Subsistence Media Services Primary	04/07/87 04/14/87	420.00 150.00
Subtotal of receipts this page			3,586.40

(14-2)

OGC 8754

TRANSCRIPT OF PROCEEDINGS

UNITED STATES OF AMERICA

BEFORE THE

FEDERAL ELECTION COMMISSION

- -x
IN RE: :
M U R 2583 :
- -x

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 NOV 28 PM 3:02

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DEPOSITION OF GEORGE STUART KARL, JR.

Washington, D. C.

Wednesday, November 7, 1990

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UNITED STATES OF AMERICA

BEFORE THE

FEDERAL ELECTION COMMISSION

- -x

IN RE:

M U R 2583

- -x

DEPOSITION OF GEORGE STUART KARL, JR.

Washington, D. C.

Wednesday, November 7, 1990

Deposition of GEORGE STUART KARL, JR., called for examination pursuant to notice of deposition, at the Federal Election Commission, 999 E Street, N.W., Sixth Floor, at 10:06 a.m. before MARLENE KNOWLES, a Notary Public within and for the District of Columbia, when were present on behalf of the respective parties:

PATTY REILLY, ESQ.
JOSE RODRIQUEZ, ESQ.
JONATHAN A. BERNSTEIN, ESQ.
Federal Election Commission
999 E Street, N.W.
Washington, D. C. 20463
On behalf of the Commission.

LAURIE S. FULTON, ESQ.
Williams & Connolly
Hill Building
839 Seventeenth Street, N.W.
Washington, D. C. 20006
On behalf of the Deponent.

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C O N T E N T S

WITNESS	EXAMINATION
George Stuart Karl, Jr.	
by Ms. Reilly	3

E X H I B I T S

KARL DEPOSITION NUMBER	IDENTIFIED
Exhibit 1 - 4/13/84 letter and attachment	119
Exhibit 2 - 3/12/84 letter	131
Exhibit 3 - List of contributions	149
Exhibit 4 - Handwritten note	166
Exhibit 5 - RSVP list	173
Exhibit 6 - 2/7/86 memorandum	192
Exhibit 7 - 2/24/86 letter	193
Exhibit 8 - 5/23/84 memorandum and attachments	204
Exhibit 9 - Invoices	210
Exhibit 10 - Handwritten notes	215
Exhibit 11 - Lists of charges, and invoices	225
Exhibit 12 - 3/7/84 letter	246

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P R O C E E D I N G S

Whereupon,

GEORGE STUART KARL, Jr.

Was called as a witness and, having first been duly sworn, was examined and testified as follows:

EXAMINATION

BY MS. REILLY:

Q We are here at the Federal Election Commission on November 7, 1990 taking the deposition in a matter entitled MUR 2583. This deposition is taken pursuant to the Commission's subpoena power at 2 U.S.C. Section 437g(a).

Would you state your name, please?

A George Stuart Karl, Jr.

Q Are you known by any other names, Mr. Karl?

A No.

Q Stuart Karl, for example?

A Stuart Karl.

Q Have you had your deposition taken before?

A Yes.

Q And just to sort of refresh you in the process, what we're going to be doing this morning is asking you a

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series of questions relating to your activities and relating to the activities of other people.

It is very important that you give verbal answers to my questions. The court reporter can't reflect gestures and nods. Do you understand that?

A Yes.

Q It is also important that you answer each question fully and completely. Do you understand that?

A Yes.

Q If you don't understand a question or if you are unclear about what I'm asking, please let me know and we'll try and rephrase the question. Do you understand that?

A Yes.

Q If you failed to indicate that you haven't understood a question, I'm going to presume that you have understood the question and I'm going to further presume that you answered it fully and completely. Do you understand that?

A Yes.

Q If at any time you want to modify or change your answers, let me know and we'll make an effort to

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accommodate you.

Now, you have just taken an oath to tell the truth. What that means is you should consider your testimony here today the same as though you were testifying before a court of law. Do you understand that?

A Yes.

Q Other than your counsel, have you discussed the fact that you are being deposed this morning with anyone?

A Yes.

Q Who did you discuss it with?

A My wife.

Q Anyone else?

A Probably my travel agent.

Q Anyone else?

A Not that I recall.

Q What were the substances of those conversations?

A I'm going to Washington to give a deposition.

Q And that was it?

A Yes.

Q Did you examine any documents in preparation for your testimony this morning?

A No.

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Q None at all?

A In what time period?

Q Let's say for the previous two weeks.

A No.

Q Did you receive a subpoena from the Commission in this matter, a long time ago?

A Not that I recall, I must have.

Q Would you except my representation that you did receive a subpoena?

A Yes.

Q Did you produce documents to the U.S. Attorneys office regarding some of the matters at issue today?

MS. FULTON: Could you make the time frame more clear, please?

MS. REILLY: Let's go from 1988 forward.

THE WITNESS: Did I produce documents to --

Q -- to the U.S. Attorneys office.

A Personally?

Q Yes.

A Since 1988?

Q Yes.

A I don't recall personally doing it. I may have,

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through counsel.

Q You gave documents to your counsel and --

A Yes.

Q -- your counsel produced documents to you?

A Yes.

Q Were those documents returned to your counsel from the U.S. Attorneys office?

A You have to ask my counsel.

Q So you have no personal knowledge of that?

A I don't recall. I don't know. I mean -- I don't know. Were they? The documents that U.S. Attorneys -- I don't know the details of what they have or don't have. Or what you have and don't have since I wasn't involved in the transaction.

Q But you caused your records to be searched and provided documents to your counsel to give to U.S. Attorney; that is correct?

A Yes.

Q What is your address, Mr. Karl?

A [redacted]

Q Is that your home address?

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A Yes.

Q Do you have a business address?

A Mailing P.O. Box 177, Riverside Drive, Newport Beach, 92660 also.

Q And what is your phone number?

A [redacted]

Q What is your occupation?

A I'm a producer.

Q What do you produce?

A Home videos.

Q Are you currently employed?

A Yes, as a producer.

Q Are you employed by any person or entity?

A Yes.

Q And what is that?

A Cooper/Hamilton Inc.

Q And where are they located?

A Newport Beach.

Q And how long have you been with them?

A The last three or four months.

Q What is your salary?

A It depends. I mean I don't have a set salary.

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You know, depending on the productions. Anywhere from 5 to $10,000 a month.

Q How is that set?

A Well, it is a pretty new situation. So we're just starting out, and it's what's available and what the needs are.

Q Is this a company or -- well, is it a corporation?

A Yes.

MS. FULTON: I object. I don't understand how this question is relevant to the scope of the subpoena.

MS. REILLY: We're just trying to get a little background information to see what Mr. Karl's salary is and to see what he's been doing since the last time we've heard from him. This is just a little bit of background stuff.

MS. FULTON: My objection stands.

MS. REILLY: Okay.

BY MS. REILLY:

Q Is Cooper/Hamilton a corporation which you have incorporated?

A Yes.

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Q And Cooper is your son's name?

A Yes.

Q And Hamilton is --

A My other son's name.

Q Do you have any other children?

A No.

Q Prior to -- well, let me back up a little. Who else is involved in your corporation at Cooper/Hamilton?

MS. FULTON: Objection. I believe this is outside the scope of this deposition.

MS. REILLY: I'm going to ask you to answer it anyway, please.

A No one.

Q You are the only one who runs it?

A Yes.

Q Do you have any employees?

A Yes.

Q How many?

A One.

Q And that is?

A Ed Hanlon.

Q And Mr. Hanlon's position is?

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A Salesman.

Q Prior to starting Cooper/Hamilton, what were you doing then?

MS. FULTON: Objection.

BY MS. REILLY:

Q I'm going to ask you to answer, please.

A I was president of NAC Home Video.

Q And what does NAC stand for?

MS. FULTON: Objection.

THE WITNESS: I don't know.

BY MS. REILLY:

Q What were you doing there?

A President.

Q And where are they located?

A Newport Beach.

MS. FULTON: Objection. If this line of questioning is going to continue I'm going to ask him not to answer. I'm going to instruct him not to answer the questions.

I believe that these are outside the scope of this deposition.

MS. REILLY: As you know, the Commission has

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very wide investigatory powers. And it, of course, would be our position that they are well within the scope of the deposition, and particularly given the nature of the Commission's reason to believe findings regarding the pattern of activity that went on here, I --

MS. FULTON: How does this relate to the pattern of activity that went on?

MS. REILLY: I think we're all very clear that Mr. Karl was involved with a corporation or a number of corporations, and those corporations may have made expenditures in connection with the Federal Election as prohibited by law.

We've also seen a pattern where, apparently, there have been contributions made in the name of others. And for that reason, it is very relevant to probe into what Mr. Karl has been doing since this time. And I'm going to continue with the line of questioning.

MS. FULTON: I'm going to continue to object to those questions.

MS. REILLY: That's fine. We note your objections.

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BY MS. REILLY:

Q How much money did you make at NAC?

MS. FULTON: Objection.

MS. REILLY: Do you want to do a continuing objection?

MS. FULTON: I'd like to have a continuing objection.

THE WITNESS: What does that mean, "a continuing objection"?

MS. FULTON: It means that I don't have to keep saying it. But at some point I'm going to instruct him not to answer.

BY MS. REILLY:

Q How much money did you make at NAC?

A 15,000 a month.

Q A month?

A Yes.

Q And how long were you there?

A Six or seven months.

Q And roughly how many employees do they have?

A Four.

Q And you were one of those four?

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A Yes. Five.

Q What kind of work did you do for them?

A Produce and distribute home videos.

Q How long were you there?

A I think I just answered this. Six or seven months.

Q And then before that where were you working?

A Just independent producing.

Q And that was, sort of, out of your house?

A No. I had a -- well, as an independent producer, you kind of pick up projects as you go. So technically I've always worked out of the P.O. Box which is 177, that address.

Q Can you tell me a little bit about your educational background?

A Can you be more specific?

Q Did you graduate from high school?

A Yes.

Q When was that?

A '71.

Q Did you attend college?

A Yes.

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Q And did you receive a degree?
A No.
Q Roughly how many years of college did you have?
A One.
Q And after you left college what did you do then?
A I started a magazine.
Q What was the name of that magazine?
A Industry Magazine.
Q Is that still an ongoing concern?
A As of last year, no.
Q But prior -- so we're talking between '72 through 1989?
A Yes.
Q And you were involved with it during that time?
A Just the first seven years.
Q And then you sold your interest?
A Yes.
Q Have you taught any seminars regarding home videos?
A Periodically I've spoken on home videos.
Q When was the last time you did that?
A I don't recall.

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Q In the last year?

A No.

Q Two years?

A No.

Q So not recently?

A Not recently.

Q Are you married, Mr. Karl?

A Yes.

Q And your wife's name?

A Deborah Karl.

Q When you were working on the magazine, that was not a full-time project; is that correct?

A It was full time.

Q It was full time?

A Yes.

Q Do you currently have any interest in any partnerships?

A Yes.

Q What are those?

MS. FULTON: Objection.

BY MS. REILLY:

Q I'm going to ask you to answer it, please.

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A I'm a general partner in two partnerships.

Q And what are their names?

MS. FULTON: Objection.

THE WITNESS: Six Pack and Four Pack.

BY MS. REILLY:

Q And the Six Pack, what is its business?

MS. FULTON: Objection.

THE WITNESS: Developing video projects.

Q And would the answer be the same for Four Pack?

MS. FULTON: Objection.

THE WITNESS: Yes.

BY MS. REILLY:

Q Are you currently involved with any other corporations?

MS. FULTON: Objection.

BY MS. REILLY:

Q And by that I mean sort of owning stock as a -- in a closely-held corporation?

A No.

Q Do you have a financial interest in any other companies since 1983?

MS. FULTON: Objection.

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THE WITNESS: Just the ones I've stated.

BY MS. REILLY:

Q That would be it?

A Yes.

Q Are you currently involved in any civic organizations?

A No.

Q How about any community organizations?

A AYSO Soccer.

Q Which is a?

A My kid's soccer team as a helper.

Q Are you a member of any clubs right now?

A Yes.

Q What clubs are those?

A The Pacific Club.

Q And that is a country club?

A No, it is just like a lunch club, dining room.

Q In 1983 where were you employed?

A Karl Video Corporation.

Q And Karl Video is a corporation, yes?

A Yes.

Q And is it known by any other names?

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A KVC.

Q KVC?

A Yes.

Q Anything else?

A Not that I recall. Just Karl Video, KVC.

Q What was your position with this company?

A President.

Q Were you the founder of the corporation?

A Yes.

Q When did you find it?

A I don't recall. '79, '80. Somewhere around there.

Q Was this after you had finished with the magazine?

A Yes.

Q So you went from the magazine to Karl Home Video?

A No.

Q What was the intervening occupation?

A Another magazine.

Q What was that?

A Video Store Magazine.

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Q Is that still an ongoing concern?

A Yes.

Q Are you still associated with it?

A No.

Q When did you sell your interest in that?

A '79, '80. Right around there.

Q Right before you started Karl Home Video?

A Yes.

Q Can you tell us a little bit about what Karl Home Video did?

A Developed, produced, manufactured and distributed home videos.

Q Starting in 1983, how many employees did you have?

A I don't know a specific number.

Q A rough number?

MS. FULTON: If you can recall. Don't speculate.

THE WITNESS: I don't know a specific number.

BY MS. REILLY:

Q Did you have less than 100?

A Yes.

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Q Did you have more than 20? Roughly.

A 15 to 20.

Q Can you tell me a little bit about how it was set up in terms of organization. You were president. Did you have any vice presidents?

A Yes.

Q And who were they? This is 1983.

A Yes, and this is 1990. Dennis Blackburn was vice president in '83.

Q Anyone else?

A On a technical basis, I think he was like the vice president.

Q On sort of a nontechnical basis, were there any other vice presidents?

A Yes. There was Harold Weitzberg who had sales, Court Shannon did marketing. I think that was the -- I guess the basic structure.

Q Now, in 1988, was Mr. Blackburn still at the corporation?

MS. FULTON: Excuse me. Which corporation are you referring to, Karl Video?

MS. REILLY: Yes, right.

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THE WITNESS: No.

BY MS. REILLY:

Q And Mr. Weitzberg?

A No.

Q In 1983 can you tell me a little bit about the decisionmaking authority there, who had authority for example to hire and fire?

A All the names I mentioned.

Q Anyone else?

A No. Well, I think our shipping -- the guy who ran shipping could hire shipping clerks. And our accounting girl could probably hire and fire accounting people. And our duplicating guy could probably hire and fire duplicating people. And so on.

Q So authority to hire and fire wasn't just with you?

A Right.

Q You mentioned that Mr. Blackburn was there and Mr. Weitzberg was there, can you name some of the other employees you had in 1983?

A Eileen O'Malley. Elizabeth Baughman, Rama White. I'm trying to remember what her name was then.

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And now it is --

Q She later became?

A Middel. Abraham Kantzabedian, Kevin Burke, Rich Mulharen.

Q Sounds like sort of a small group?

A Yes.

Q What were the sort of major projects you were working on in '83?

A Our major project at the time was the Jane Fonda exercise tapes.

Q Anything else?

A Richard Simmons exercise tapes.

Q Anything else?

A Graham Kerr cooking tapes. Made a show called Money Hunt, various other titles.

Q Can you sort of specify what your duties were in '83 regarding all of these projects?

A Can you be more specific?

Q Well, did you approve the corporation's decision to decide to produce a video, for example?

A Yes.

Q And were you responsible for figuring out what

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the financing of it would be?

A Yes.

Q What other sort of things would you do regarding production of videos?

A I would be involved in the production, approvals of crews and producers and creative, and then to marketing on down.

Q And by "on down," the lowest type of work you would do, would be what?

A I would make the coffee every morning.

Q That is pretty low.

A I take the trash out on Saturdays.

Q During 1983, which is sort of where we are right now, roughly how many hours would you work a week?

A A lot.

Q Definitely more than 40?

A Yes.

Q 60?

A I don't know. Yes.

Q And if you were not there for some reason, who would make the decisions in the areas we just discussed, other than making coffee and taking out the trash?

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MS. FULTON: Could you be more specific and go through the areas?

BY MS. REILLY:

Q Who would make decisions if you were not available, regarding financing of videos?

A Dennis Blackburn.

Q Anyone else?

A Can you be more specific when you say "unavailable."

Q Suppose you were out of the office. Who would everyone turn to as, sort of, second in charge.

A The phone probably, they would call me. I mean I don't understand the question.

Q Well, then, maybe I need to rephrase it a little.

Were you always available during this time period to answer questions and make decisions?

A I would like to think I was.

Q And if you for some reason couldn't be around who would be second in charge?

A For what specific area?

Q If I understand your question you sort of

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delegated into certain areas; is that correct?

A Depending on what was going on and the scope of the project.

Q So for example for obtaining a crew, who would answer that question?

A Well, probably, specifically, you would hire a line producer who would be responsible for that. And he'd communicate that to me.

Q Well, would Mr. Blackburn be making any decisions in your absence?

A On what?

Q Anything at all.

A Yes, he would make a lot of decisions in my absence.

Q What sorts of decisions would he make?

A He would probably have to make the coffee if I wasn't there.

Q And take out the trash.

Anything else?

A I'm sure he would assume a lot of things, I mean I --

Q Would he do everything that you would do, in

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your absence?

A Dennis Blackburn wasn't me, so I can't imagine he would be doing everything I would be doing.

Q But he would be second in command; is that correct?

A Yes.

Q And Mr. Weitzburg, would he also --

A More sales related, specifically.

Q So he would mostly make decisions about sales?

A Yes.

MS. REILLY: Why don't we break so you can make your call.

A Thank you.

(Recess.)

BY MS. REILLY:

Q Just to sort of refresh you as to where we were, we were discussing Karl Home Video, roughly during the time period 1983. Was --

MS. FULTON: Excuse me one moment.

(Witness conferred with counsel.)

BY MS. REILLY:

Q Is there anything that you wanted to clarify?

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A No. It was easy using your phone, thank you.

MS. FULTON: No clarification.

MS. REILLY: Okay.

BY MS. REILLY:

Q Did Karl Home Video come to sell its assets to another organization?

A Yes.

Q And who did Karl Home Video sell its assets to?

A Lorimar.

Q And when did that happen?

A '84 I think.

Q Do you remember roughly when in '84?

A October '84, I think?

Q What were the circumstances that you came to sell the assets of Karl Home Video to Lorimar?

A Can you be more specific?

Q Did they approach you and ask you if you wanted to sell?

A Yes.

Q And when was that?

A I don't recall the date.

Q Was it -- it was obviously prior to the sale.

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Was it in 1983?

A I don't remember. Probably '83.

Q Probably before the holidays in '83?

A I don't recall exactly when. I'm sorry.

Q What were the terms of the sale?

MS. FULTON: Objection.

BY MS. REILLY:

Q I'll ask you to answer, please.

A Can you be more specific?

Q How much money did you get for it?

MS. FULTON: Objection.

THE WITNESS: Can you be more specific on that?

BY MS. REILLY:

Q Let me ask you a very specific question. How did Lorimar pay you for Karl Home Video's assets?

MS. FULTON: Objection.

THE WITNESS: They wrote a check.

BY MS. REILLY:

Q What was the amount of that check?

MS. FULTON: Objection.

THE WITNESS: I think the first check was $1.7 million.

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BY MS. REILLY:

Q Was there a second check?

MS. FULTON: Objection.

THE WITNESS: There was another check for $500,000.

BY MS. REILLY:

Q And the first check was written, roughly, when?

A October of '84.

Q And the second check?

A The same, October '84.

Q I guess I don't understand. Why were there two checks?

A I mean that's when -- because -- this is somewhat complicated, because there was some duplicating equipment and the 500 was held against the duplicating equipment based on a certain formula. And as that earned out, then that freed up to $500,000.

Q I see. As a result of this sale of assets, did Karl Home Video change its name?

A Yes.

Q What did it change its name to?

A I think, technically, Karl Home Video, Inc.

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Because prior to that, I think it was Karl Video Corporation. And I think we changed it then to Karl Home Video Inc.

You have been saying Karl Home Video. People refer to us as a lot of things. Technically, we're Karl Video, KVC, Karl Home Video; I think then it was technically changed to Karl Home Video Inc. I think, I don't remember specifically.

Q Was the Lorimar name in the title at all?

A Not at first.

Q Did Lorimar's name subsequently --

A Yes.

Q -- become part of the title?

A Yes.

Q When was that?

A Some months later. I don't know the exact time.

Q Same year though?

A I don't think so.

Q Was it within a year?

A Yes, I think it was within a year.

Q And why did Lorimar's name come to be part of a title?

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A I think they wanted an identity with the unit.

Q As a result of this sale of assets to Lorimar, did any of your employees change?

A How do you mean, "change"?

Q Leave.

A When?

Q Let's say within the first six months after the sale?

A Yes, I think. I mean it is hard for me to remember employee turnover. I mean, you know, when you have people in the warehouse and people in duplicating, I have to believe there were people coming and going within --

Q How about management types? Did any of your management change?

A Yes. I don't know if exact date, but Dennis Blackburn left at some point. I don't know the timing when. But he did leave.

Q And was he replaced by anyone?

A Well, I don't recall specifically if he was replaced by anyone at that time.

Q Was he, later on, replaced by someone?

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A Oh, yes.

Q And who was that?

A I'm just trying to think, the time frame. I mean, a number of people then did what he did. I mean he was kind of a general manager. We never replaced a general manager per se, but we began to fill out the finance department and the administration with different people.

I mean, so it was like we went from being a small organization to, all of a sudden, trying to be more of a structured organization. There wasn't one general man like Dennis. Other people came in to do certain functions, finance, planning, things of that nature.

Q So you were getting bigger after the Lorimar purchase?

A Yes.

Q And you testified before maybe 15 or 20 people there in '83. Roughly how many people did you have in 1985?

A 50.

Q How about '87?

A I know it was over 100.

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Q So that is a lot of growth.

Did you become more formalized as a result of this growth?

A I think you are constantly attempting to be.

Q Can you describe some of those attempts?

A How do you mean, describe those attempts?

Q Well, did you set up for example a finance department?

A Yes, we had a finance department.

Q And who was in charge of that?

A When?

Q Let's start with when it was first set up?

A I don't recall. I know we had a consultant. I don't know when he came on full time. That's why I'm a little -- I can't say, you know, he came on full time. Because I know there was a consultant in there. I can't recall when the consultant switched to full time or brought in another full time --

Q So for a while finance was sort of --

A Well, we were trying to --

Q -- in a flux.

A -- sort out what we were doing, plus we were

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interfacing with Lorimar at the time. He was trying to determine what they wanted to do with the department, whether they would take it in-house or leave us the function. So it was, you know, that's the way it was.

Q What about 1987, did someone -- was someone running finance then?

A Yes.

Q Who was that?

A A guy named Mike Piriano.

Q Could you spell that for us, please?

A No, to be honest with you, I can't. I'll try, P-i-r-i-a-n-o. We called him Mikey.

Q How long, roughly, was he with you?

A He was there in that role I think between four and six months as I recall.

Q Who was there before him?

A A guy named John Lutgens.

Q How long was Mr. Lutgens there?

A Probably a couple years before that. A year, year and a half, two years.

Q Just to round up the picture. After Mikey left, who was he replaced by?

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A I wouldn't know that.

Q Because this was after you departed?

A Yes.

Q Do you recall anybody else who was in charge of finance, other than the people that you have mentioned?

A Well, I mean that's a broad question. You mean at Lorimar or in day-to-day at our office or --

Q I guess what I really meant, who was in charge as in who ran finance?

A Well, technically those were their titles.

Q And there was no one else who held those titles is what I'm trying --

A Right, no one else had those titles.

Q And you said you had an administrative division?

A Well, we had a consultant. I'm trying to figure out what his title was, who helped -- started helping with the structure and we started growing.

Q Do you remember the name of the consultant?

A Steve Bornstein.

Q How long was he with you?

A A couple years.

Q Beginning in --

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A I don't know, '85? 85ish.

Q Was there a separate planning division or was that part of administration?

MS. FULTON: Excuse me, could you repeat the question?

MS. REILLY: I'm sorry.

BY MS. REILLY:

Q Was there a separate planning division?

A Not that I recall.

Q Is the name Court Shannon familiar to you?

A Yes.

Q And who is Court Shannon?

A He was like senior vice president, kind of like the number two guy.

Q And when did Mr. Shannon come on board?

A I think I mentioned he'd been there since '82 or '83, I don't know the exact date.

Q A long time?

A Yes.

Q Is the name Gary Hunt familiar to you?

A Yes.

Q And who is Mr. Hunt?

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A He was brought in as vice president of sales.
Q And who did he replace?
A Harold Weitzberg.
Q When did Mr. Weitzberg leave?
A I don't recall. Sometime between '84 and '87.
Q Was Mr. Weitzberg there prior to the sale to Lorimar?
A Yes, I think he was.
Q Was he there afterwards?
A Yes.
Q But did he leave as a result of the Lorimar sale?
A How do you mean?
Q Was he unhappy with the Lorimar acquisition?
A I don't know. You would have to ask him that. I don't think he was.
Q Do you know why he left?
A I think we replaced him.
Q So he was fired?
A I don't know if he was fired. I don't like to use that word.
Q What word would you use instead?

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A The organization outgrew his abilities.

Q Let's move back before the sale for a second. Can you tell me a little bit about the sort of bank accounts that KVC had? How many?

A I don't recall.

Q Did you have more than two?

A I don't recall.

Q Surely you had a checking account; right?

A Oh, yes. Dennis did a lot of that. I wouldn't recall. I mean at this point in time it is hard for me to remember.

Q But you knew you had a checking account?

A Oh, yes.

Q Were there any other accounts in 1983 -- bank accounts?

A I can assume there were. I mean I couldn't really give you the details or specifics. I don't remember how many or -- to be honest with you.

Q Where did you bank, the corporation?

A A bank in Newport.

Q Was it near the office?

A What do you consider "near the office"?

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Q A couple miles.

A Yes.

Q Did the corporation have any certificates of deposits?

A Not that I recall. I don't remember.

Q Who had authority to open up the bank accounts?

A I guess Dennis would.

Q Did you ever open a bank account?

A I may have. But I don't remember. I mean obviously I must have before I started the company. I can't sit here and tell you exactly when.

Q Who was signing checks in 1983?

A I think Dennis signed a lot of them. Obviously I probably had signature power. I'm sure Dennis did. I can't recall if anybody else did.

Q Would Court Shannon have had authority?

A In '83?

Q Yes.

A I don't know. I don't remember.

Q What about Mr. Weitzberg?

A I don't think so. Again I can't be exact. I just don't think so.

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Q Now, after the asset sale to Lorimar, were the accounts changed?

A Yes.

Q They were?

A I think they were. I can't tell you specifically, but I think they were.

Q Why do you think that happened?

A Well, whether they were changed or not, I know they probably -- well, I don't know. Now that I think about it, I don't know. I can't tell you honestly, I don't know.

Q You didn't switch banks?

A I don't think at first we switched banks.

Q But you did later?

A I think we did later.

Q And by "later," just so I'm clear, roughly what year?

A Between '84 and '87.

Q Any sense of which end?

A Probably the earlier end, '85.

Q As a result of the Lorimar acquisition, did you open any new accounts?

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A I think you asked me that earlier. I don't recall.

Q Did you close any accounts?

A I tell you I don't really recall.

Q During 1983 who made deposits into your accounts?

A I don't know.

Q Did you?

A I can't specifically remember making a deposit. What do you mean by making a deposit?

Q Did you go to the bank and fill out a deposit slip?

A Probably didn't do that.

Q Did you in your office fill out a little deposit slip and give it to a --

A Probably Dennis Blackburn did most of that, and --

Q Mostly Dennis?

A Yes, I'm trying to think, physically did I drive down there, I may have, on a Friday, got in the car with Dennis and went to the bank, but I can't -- it wasn't my -- I don't remember being with Dennis around doing those

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type of things.

Q So it is fair to say it probably wasn't part of your responsibilities?

A Responsibility is a broad word. Part of what I did is --

Q A better word?

A Yes.

Q During 1983, did the corporation have a political account where political contributions were made from?

A Not that I can recall.

Q And you mentioned the Bank of Newport was the corporation's bank?

A I believe so.

Q Any others?

A Not that I recall. It doesn't mean there were none, just not that I recall.

Q During 1983 were there company credit cards?

A I don't think so.

Q You don't recall having them?

A Company credit cards?

Q Yes.

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A Not that I recall, no.

Q After the sale were there company credit cards?

MS. FULTON: Do you have a year?

MS. REILLY: I would say -- well, he said '84.

THE WITNESS: I don't think so. I think everybody -- it was corporate policy you used your own and got reimbursed. I don't think they ever issued company credit cards. Then again they may have, I don't remember.

Q But you never had one?

A No.

Q And for the period through 1983 through 1988 what credit cards did you have?

A I had an American Express card, and a Bank America card.

Q Anything else?

A Not that I recall. I may have had a Master Charge, but I don't think I ever used it. Mostly used American Express.

Q And who had authority to use your cards?

A Who had authority to use my cards? Well, for traveling, I think the travel agency had my number. So some people, when they got tickets, it would be put on my

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number periodically.

Q This would be, sort of, over the phone transactions?

A Yes. Other than that I don't recall.

Q Your wife have any?

A Of course.

Q She had her own card in your name or her own personal card?

A Well, she had -- I guess it is all derivative. Don't you get multiple cards?

Q Sometimes, yes.

A Well, she had one of those cards.

Q Just so I'm clear, it was all from one account number?

A Yes.

Q Did you use a credit card in anyone else's name?

A How do you mean?

Q Did you have a credit card that was your father's?

A All these were my father's.

Q All these credit cards were your dad's?

A Yes.

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Q Why was that?

A It just happened that way, way back when, and we just never changed it.

Q But the bills, did they come to you?

A They went to my father and he would hand them to me.

Q Did your father also charge on this card?

A I'm sure he did.

Q So how would you go about segregating out the bills?

A He would take out his charges and hand me the bill.

Q Relatively quickly?

A Yes.

Q And up until 1988 you and your dad still shared the same card?

A Yes.

Q 1983 where was the office located?

A In Newport Beach.

Q And the address?

A What was our address, 875 West 16th.

Q After the sale, did you remain there?

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A For a period of time, yes.

Q And you moved?

A Yes.

Q When was that?

A I don't know the exact date. Sometime after the sale.

Q Shortly after the sale?

A I don't recall exactly when. I really can't tell you exactly when. I know it was before Christmas of '85 because I have a little card with my kids, and it has Christmas '85 on it and I know it was taken at the other office.

Q And where did you move to, addresswise?

A 17942 Cowan Street, Irvine, California.

Q And how far is that from Newport Beach to Irvine?

A Five minutes. It is the next city.

Q So it was a short move?

A Yes.

Q Was it a nicer building you moved to?

A Yes.

Q And I presume you have had your own office all

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the way through?

A Yes.

Q In the old building, physically, where was your office located?

MS. FULTON: Objection.

THE WITNESS: It was like two buildings --

MS. FULTON: The subpoena is for documents from the FEC. We have yet to see a document. We've run into all kinds of areas here that I believe are outside of the scope of this deposition. And I object.

MS. REILLY: Well, we note your objection. But given the fact that there were apparent reimbursements from persons in the office it is pretty relevant where people were sitting.

So I'm going to ask you to answer the question, please.

THE WITNESS: What was the question?

MS. REILLY: Would you read the question, please.

(The reporter read the record as requested.)

THE WITNESS: Towards the back.

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BY MS. REILLY:

Q Was it on the first floor? Second floor?

MS. FULTON: Objection.

THE WITNESS: First floor. We were actually separated. By the time -- what was the date?

BY MS. REILLY:

Q '83.

A By then we had three separate -- it was an industrial complex, we had three different buildings, the main 875. Two doors down was another industrial warehouse that we built out in an office which was mine.

And two doors down from that was our shipping warehouse.

Q Were all the offices in that one building that you were in?

A No, I said two. And then shipping.

Q And then -- so outside your door did you have a secretary sitting there?

A No.

Q Who was -- whose office was next to yours?

A I had a meeting room -- a conference room.

Q Just so I understand, people had to walk through

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the meeting room to get to your office?

A Yes.

Q And then your secretary was outside the meeting room?

A Yes.

Q And in 1983 who was your secretary?

A Either Elizabeth or Rama. I know there was a transition. One of those two.

Q And Elizabeth is Elizabeth --

A Baughman.

Q And Rama is Rama White or Middel --

A Yes.

Q -- depending on the time frame.

Where did Mr. Weitzberg sit?

A Up at the other building, 875.

Q What about Mr. Shannon?

A 875.

Q And Mr. Blackburn?

A 875.

Q Who else was in your building who had decisionmaking authority?

A What do you mean by decisionmaking authority?

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The duplicating guy was there. So they ran the duplicators there. So he had decisionmaking authority over the duplicating.

Q And duplicating, we're talking about duplicating videos; right?

A Videotapes.

Q Who else was in your building?

A There was Rama, Abraham Kantzabedian, and then the duplicators.

Q And that's it?

A Yes.

Q And Abraham was --

A He was like a -- at one time he helped produce some shows with me, kind of like a production assistant. And then other times he was like an administrative guy, run around and do errands, and things like that. Especially when we do personal appearances, or talent, or coordinate, all kinds of stuff.

Q So he was sort of a personal aid?

A Yes, I guess.

Q How did employees who wanted to see you get in to see you?

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A They just walked in the door.

Q Past Rama through the conference room to your door?

A Yes. I mean you didn't have to go through Rama's office to get to me. But from the technical point of view they are supposed to call and make an appointment. But the practical point of view they would just walk in.

Q In the beginning when there were 15 people or so, did people come by and see you often?

A Yes, I have always had pretty much an open door policy.

Q Even when 1988 we're looking at roughly 100 people, still open door policy?

A I wasn't there in '88.

Q I'm sorry, '87?

A Got a little less open, a lot more closed.

Q Now in '87, if someone wanted to come and see you, how would they get access to you?

A They would probably call me or Rama and see if I was going to be there. She would tell me and I would say yes, send them in.

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Q Or "no, send them away"?

A Yes, but didn't send many people away. I mean --

Q Pretty much anybody who wanted to see you could see you eventually?

A Yes, unless I was doing something. I don't know how to answer that.

Q Did you have a private line, telephone line?

A Yes.

Q And did everyone have that number?

A No.

Q Who had that number?

A Well, my wife -- I had one number for my wife that she could call at my desk, pretty much my line.

Q Anyone else have that number?

A Oh I'm sure a lot of people did, not that I wanted them to, but I'm sure a lot of people did. I don't remember many people calling me on that. That's what I used to call in too when I was on the road, because it would ring as Rama's desk also.

Q So it rang at Rama's desk and it rang at your desk?

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A Yes.

Q And if you weren't there she could pick up; is that correct?

A Yes.

Q In the beginning, say 1983, when you were sort of a small company, was there a procedure for mail delivery?

A How do you mean, "procedure"?

Q Mailman comes and brings the mail and what happens to it next?

A I don't remember.

Q Well, did you see invoices coming in in 1983?

A Probably not.

Q And if you didn't, who would have?

A I would assume Dennis would. I mean --

Q Anyone else?

A I would assume that if it involved something with other people he may show them. I can't really answer that. I'm just assuming that if it involved something that other people would take a look at it.

Q So it was your testimony there is no regular procedure for you to see --

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MS. FULTON: I'm not sure that that adequately reflects his testimony. I think he's carefully said "I assume" and "I don't recall."

BY MS. REILLY:

Q Did you see your personal mail when it came in?

A Yes.

Q And did you get a lot of personal mail at work?

A I don't recall.

Q Was it unusual for you to get personal mail at work?

A What do you consider "personal mail"?

Q Personal letters, correspondence that's personal --

A What do you mean by "personal"?

Q Nonbusiness related.

A A letter from my wife or --

Q A letter from your mom, yes.

A I'm sure no one would open that. They would give it to me if my wife or mom wrote me a letter. I don't recall my wife or my mother writing me a letter.

Q Generally did you receive mail in 1983 at the corporation?

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A Yes.

Q And what kind of mail did you receive?

A What kind of mail did I receive in 1983?

Q Yes.

A That's a pretty broad question there. Could you be more specific?

Q Well, did you see for example the corporation's telephone bill?

A Probably not. Not that I recall.

Q How about your American Express bill, did that come to your work?

A I think my father would hand that to me.

Q And what about your other credit card bills?

A I don't recall. I don't recall how those were treated or dealt with.

Q Well, daily, at some point, did you see something called "the mail"?

A I had an in and an out box. So I mean if you want to characterize at this point and day I'm looking at the mail, that was going through the in and out box, it may be mail in that in box. I don't think anybody ever walked in and put the mail on my desk, per se.

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Q But if you were to see the mail, it would eventually end up in your in box; is that correct?

A Any mail that I would get would end up at my in box.

Q And people who called on the telephone, other than your personal line, would they go through Rama?

A Eventually, yes. I don't know how -- if it went to someone else first before it went to her. But I think it eventually went through Rama.

Q And she would screen your calls; is that correct?

A I think that's a fair characterization.

Q Was there a procedure for Rama giving you your telephone messages?

A Yes, they would type them up.

Q Type them up?

A It depends. Sometimes they would hand me slips, sometimes they would be more formal and type them up, I mean sometimes they would just tell me and I would write them down.

Q So there were three ways essentially, either you got the slip, you got the typed --

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A Or sometimes they wouldn't tell me at all.

Q But in terms of what you actually received, we have the slips and the typed --

A Yes, I think it finally came down where they would just type them up on a sheet. That was the best --

Q And that was sort of a daily event?

A I think you probably have copies of those, don't you?

Q Yes, we do. But my question is --

A Do they look daily to you?

Q Well, you know, actually sometimes they look more than daily; is that correct?

A Yes, I would have to look at it and see what you are referring to.

Q But you would receive typed telephone messages more than occasionally; is that correct?

A Yes.

Q What about internal company memos, did you receive any of those?

A Yes.

Q And would they also come in through your in box?

A Yes.

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Q Did you receive them any other way?

A People may have handed them to me. I may have got them off Rama's desk. There could be any number of ways.

Q So again we're talking sort of informal; is that correct?

A Yes.

Q Now, after the sale to Lorimar, can you give me an idea of the types of expenditures the corporation would make?

MS. FULTON: Can you be more specific in that question?

THE WITNESS: Yes, that's a pretty broad question.

BY MS. REILLY:

Q Who did you pay to do things for you?

A Lots of people. Can you be more specific?

Q Well, if you were producing a video, for example, what were the kinds of things that you would buy to see that production was carried through?

A If I were producing a video -- that's such a broad question. What do you mean?

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Q I think it really reflects that I don't know much about the industry. So I guess I'm sort of relying upon -- on you to help me out a little bit I guess. You had accounts --

A A contradiction in terms.

Q You had accounts receivables, people who you owed money to presumably, and --

A That would be accounts payable.

Q Payable -- see? You do know more than I do about this.

A Not much.

Q Would you have like marketing costs for example?

A Yes.

Q And who were the kinds of people that you would pay marketing costs to?

A The boxes, designers, if we bought media time, media, advertising, chotskis, you know, if we're doing a promotion we would do a bio, oh, for Johnny Bench's baseball tape, we would have baseball bats, you know, to send the customers.

We released over 300 videos, for me to sit there and go through, you know, exercise mats for Fonda,

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T-shirts, baseball caps. Those are the different things we would buy for marketing.

Q And for taping would there be other sort of costs for that?

A Yes. I mean you would hire -- usually, unless we physically produced it, we would pay the vendors. If we hired a production company to produce it we would pay them and they would pay the vendors.

Q Right. And who were some of the vendors that you would use regularly?

A For what?

Q Was there any one that you would use regularly for a taping?

A Which taping?

Q Let's take the Fonda taping.

A We hired Sid Galanty, from Zimmerman, Fineman & Galanty. I don't know what the name of it was at the time. But he would in essence be a line producer of the Fonda product. And we would pay him and he in turn would pay the production cost.

Q I'm sorry, did you say the line producer?

A Yes.

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Q And that means what?

A The day-to-day producer.

Q How long does it take -- well, for example to produce the -- to tape -- I'm sorry, the Fonda video?

A Well, that's kind of a broad question. I mean technically the taping takes two or three days. From the time you conceive, develop, negotiate, it could be anywhere from three months to a year and a half, depending on schedules, music, costume and sets availability.

I mean there is no set, you know, it is not like this happens every three months, there is no set schedule. I mean it could be as short as a couple months; it could be as long as a couple years. Films take two or three years to make.

Q Whose responsibility was it to pay the bills as they came in regarding the taping, the producing, the marketing?

A How do you mean?

Q Well, the bill comes in from the people that you owe money to, and was there a procedure for paying it?

MS. FULTON: Are you referring to a specific video or a specific time?

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MS. REILLY: No, just a general procedure.

MS. FULTON: Not even a specific time?

MS. REILLY: We'll say after the Lorimar acquisition.

THE WITNESS: What was the question again?

MS. REILLY: Can you read it, please.

(The reporter read the record as requested.)

THE WITNESS: I would assume there was a procedure, yes.

BY MS. REILLY:

Q Were you familiar with that procedure at one point?

A Most likely yes.

Q Were there forms that had to be filled out in order that a check could be cut to pay for a bill that was owed?

A Probably. I think. I can't recall. I'm assuming yes.

Q Was there any sort of a check internally to see whether the bill was correct?

A What do you mean?

Q If you received a bill for example for a million

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dollars, and it had the name of someone in the corporation who allegedly authorized it, would you go and check?

A Would I personally?

Q Yes.

A Probably not.

Q Would there be a procedure so that the people whose names were associated with an invoice would see a copy of that invoice?

A I would assume that those procedures were there, yes.

Q And did you ever see invoices?

A I'm sure I saw a fair amount.

Q A fair amount is?

A I don't know.

Q Would you see them regularly?

A I don't recall. When?

Q Post-Lorimar.

A It is hard for me to recall what was going on then.

Q Of course you probably had a lot more of them too at that point; is that correct?

A Yes.

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Q The invoices that you did see, did you cut the -- did you sign the checks for those or did they go into your out box?

A The invoices that I did see, I cut the checks for those? You mean did I sign the checks for those?

Q Right.

A I may have, I may not have. I'm sure some I did, and some I may not have. I don't think there was a set policy if I did or didn't.

Q In 1983, was there a petty cash fund?

A I think so.

Q And where was it kept?

A I don't know.

Q Who had responsibility for it?

A I don't recall.

Q Well, would Rama?

A Maybe. I don't recall.

Q Is it in anyone's job description?

A Not that I recall.

Q Actually, in 1983, were there job descriptions for anyone?

A What do you consider job description?

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Q Some sort of written document laying out what someone's duties and responsibilities are?

A I mean there may have been attempts to make written documentation of structure and people's -- I mean I can't specifically recall, but I like to think as we were growing we would make attempts to more clearly define people's jobs.

Q Would that be Steve Bornstein's responsibility?

A I think at some point he came in to do a little of that.

Q And did he?

MS. FULTON: Could we clarify the time frame we're talking about again.

MS. REILLY: We were in '83. And then he said at some point we did. And then I said did Bornstein do it. And the answer was affirmative.

THE WITNESS: I think he made an attempt, yes.

BY MS. REILLY:

Q Do you know roughly in 1983 how much money was kept in petty cash?

A No.

Q Did you ever receive reimbursement from petty

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cash?

A I don't remember.

Q Is it likely you did?

MS. FULTON: Objection. Don't speculate.

THE WITNESS: I don't want to speculate. I don't remember.

BY MS. REILLY:

Q And as the company got bigger -- so we're talking post-Lorimar, '84, '85, '86, '87, was there a petty cash fund still?

A I don't remember.

Q Do you know if it was abolished at one point?

A I don't know that.

Q So it might have still been in existence?

A I don't want to speculate.

Q It's okay to speculate.

MS. FULTON: I believe he answered the question "I don't remember."

BY MS. REILLY:

Q You don't remember?

A I couldn't clearly tell you if there was or wasn't.

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BY MS. REILLY:

Q Now, you mentioned before -- we touched on a little bit about the credit card situation. Apparently there weren't any company credit cards?

A Not that I recall.

Q Were there situations where employees advanced their own money on behalf of either of the two corporations?

MS. FULTON: Can I ask for a clarification in terms of time?

MS. REILLY: Well, '83 and then after the acquisition it would be close to '84.

THE WITNESS: So you mean like when you travel for FEC do you use your credit card or do they give you a credit card?

BY MS. REILLY:

Q Actually both.

A So you would advance money on behalf of FEC?

Q Right. And they reimburse me.

A Yes, at times, I'm sure, employees did that.

Q Was there a procedure for it?

A How do you mean?

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Q Well, the employee gets a bill, and the bill has on it expenditures the employee has made, let's say 1983 on behalf of KVC, and how would they go about getting reimbursed?

A I assume they would fill out an expense report and then get reimbursed.

Q So in '83 there were expense report forms?

A Yes. I think there were. I can't remember right now, seven years ago looking, but I assume there were.

Q And well, since you were using your dad's credit card and people were using your credit card as well, did you fill out expense reimbursement forms?

MS. FULTON: Objection. I don't think the witness testified that people were using his credit card.

MS. REILLY: I believe he said people were using his credit card number for travel.

BY MS. REILLY:

Q Is my recollection correct?

A Yes.

Q The travel agent?

A The travel agent would have the number as I

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recall. I don't think you can walk in and use someone else's credit card anywhere.

MS. FULTON: Could you restate the question a little more adequately to reflect his testimony, please.

MS. REILLY: Let me start over again, which might be easier.

BY MS. REILLY:

Q You had a situation where you had a credit card in your dad's name which you were using for KVH -- KVC, I'm sorry, travel.

How would you go about getting reimbursed for what you would spend on behalf of the corporation?

A I don't remember.

Q Do you recall any instance where you were not reimbursed?

A I don't remember. This is 1983.

Q Okay, so let's move it up in time. Let's take 1987. 1987 if you -- when you --

A Fill out expense reports.

Q You did in '87?

A Yes.

Q You are sure about that?

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A How sure can you be about anything that happened three years ago?

Q What I'm trying to probe is why you remember in 1987 that you did as opposed to 1983 when you are not sure?

A Because in 1983 I owned the corporation and we were new, and I don't know if the systems were intact, I think I mentioned, as in 1987, there was a little more routine of how you had to do it.

Q Okay. So there was a routine in '87?

A A more clearly defined routine, yes.

Q And what was that routine?

A Can you be more specific?

Q I'll give you my example again of you spent money on behalf of KHV or Lorimar or whatever name it is using in 1987 and you want to be reimbursed, what do you do?

A Fill out an expense report, submit it, and get reimbursed.

Q And when you filled out the expense report, what information were you required to put on it?

A I don't recall.

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Q Well, did you have to put on where you went?

A Yes.

Q And where you stayed?

A Yes.

Q And whether or not you had a rental car?

A Yes.

Q Anything else?

A I can't remember.

Q How about food?

A I'm sure you put on food.

Q Would you put on it everything that you had spent on behalf of the corporation that was related to your trip?

A Would I put on everything? You are asking me definitively if I remember putting on everything, I couldn't tell you yes or no.

Q Okay. Well, let's say as a practice when you filled out your expense form for reimbursement, did you as a practice, request reimbursement for everything that you had spent money on?

A I think I would have.

MS. FULTON: Can we take a break again?

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MS. REILLY: Sure. Let's do it now. Off the record.

(Recess taken from 11:25 a.m. to 11:35 a.m.)

BY MS. REILLY:

Q When Lorimar purchased the assets of the corporation, did they physically take control of the books?

A What do you mean "physically."

Q Did they bring them to their office?

A No.

Q Did they, before they purchased the assets, did they do an audit?

A I don't know.

Q Do you recall anybody coming in and looking at the books?

A Yes, I think they did send somebody. But I tell you it was a long time ago and I don't really remember clearly.

Q The person that they sent, do you remember his name?

A If they sent somebody it would be a guy named Bob Geovonatone.

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Q And he was with Lorimar?

A Yes. I think he had some involvement, but I don't recall specifically what he did or if he did.

Q Was there an actual written sale agreement?

A What do you mean?

Q When you sold the assets to Lorimar, was there a contract?

A Yes.

Q Was there more than one contract?

A What do you mean? What do you define as "more than one contract"?

Q Well, sometimes you have a contract for sale, and then sometimes you have a sales contract, and then sometimes you might have incidental activities handled by say, a third contract.

A I'm sure there was a number of documents. I always looked at it as one contract in a generic point of view. But I'm sure there were elements to that one contract.

Q And you signed it?

A Yes.

Q Anyone at your corporation signed it?

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A Not that I remember. Someone may have, I don't remember really.

Q Now, the artistic control in 1983 was obviously yours; is that correct?

A What do you mean by "artistic control"?

Q Deciding what projects would be produced, what they would entail.

A Primarily.

Q And then after Lorimar came in, did that change?

A I still pretty much had a say in what was done in that.

Q Lorimar was located where?

A Culver City.

Q And how far is that from the Beach?

A Miles or hours?

Q Let's do both. Let's do miles first and then hours.

A What time of day?

Q Miles are the same no matter which time of the day. With driving, say, midday, no traffic.

A And hour.

Q And what about mile wise?

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month. At minimum.

Q Was there someone there that you spoke with more often than others?

A When?

Q Let's start in at the beginning.

A Sid Marshal at first.

Q And that changed?

A Yes, it changed -- evolved is a better term, yes.

Q And after you had this sort of evolution with Sid Marshal, who did you come to speak with more often?

A Kind of just different people for different things. You know, I don't -- I mean we talked to a lot of people about a lot of things. I don't know what you mean.

Q Well, you said -- what would you talk to Sid Marshal about?

A What we're doing to build the business.

Q Anything else?

A How is the ad agency business running?

Q Is that what Sid did?

A He was involved, I think in a cursory point of

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view with their ad agency, spent a lot of time exploring ways with the home video and the advertising agency to work together.

Q So that was one of your projects?

A Yes.

Q Mary McArthy, what would you talk to her about?

A She was just originally the acquisition. And then generally what's going on with the corporation as it grows.

Q When you say "what's going on," do you mean projects you are working on?

A I can't recall specific conversations with Mary McArthy from 1983, you know, I mean --

Q And I'm sorry, you said Merv -- is it Adelson?

A Yes.

Q What were the sort of things you talked to him about?

A Same thing, what we're doing, how things were going, and what we're doing to build the company, and things we want to do and the general home video industry, general.

Q Your communications with Lorimar, were they

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mostly oral communications?

A How do you mean?

Q Did you talk to them as opposed to writing them letters?

A What do you mean by "letters"? I'm trying to get a feel of what you mean. Memos?

Q Right, a memo. If you needed to communicate to them?

A Well, specifically me, I would -- I don't -- I would think I would send them memos on what we were thinking of doing. I can't recall, but I usually did that. Is there any documentation that you have that I can refer to that can refresh me on this?

Q So I'm just trying to get a feel for the communication.

A So you don't have anything that I could refer to that would refresh my memory?

Q Not now, I don't.

Did you go up to visit Lorimar?

A I had an office there.

Q How often would you use that office?

A I would try to go up there a couple times a

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week.

Q And would you drive?

A Yes.

Q Nonrush hour?

A Early, late. Different times. This is what time frame you are talking about?

Q Well, after the acquisition. But did that -- in the beginning you were up there how often, I'm sorry?

A A couple times a week.

Q Did that stay the same throughout?

A I don't think there was any rule of when I was going to be there, I mean they are just that -- or business schedule. I felt I should be there a certain period of time, communicate and interface, and we had employees there.

Q And who were your employees there?

A When?

Q Let's say at the time of the acquisition.

A At the time of the acquisition we had a development girl there, development acquisition girl.

Q And her name was?

A E.J. Oshins.

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Q Anyone else?

A When?

Q This is '83, '84, when it was first --

A I'm sure we started adding people. I mean she had a secretary, and we started adding people there over the two or three years.

Q So by 1987, how many employees did you have at the Lorimar offices?

A 10, 15.

Q When you were small, when you were KVC and you had 15 employees, what kind of perks did you have for your employees? Anyone have a car?

A Yes.

Q Who had a company car?

A I couldn't recall. When was this?

Q 1983. Well, did you have one?

A In '83?

Q Yes.

A Yes.

Q Did you have more than one?

A Yes. My wife had a car. I don't know if the company paid for it. But my wife had a car.

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Q How about Mr. Weitzberg, did he have a car?
A Probably.
Q And Mr. Blackburn?
A Probably.
Q Anyone else who probably --
A Mr. Shannon.
Q And was there sort of a company car that was used for running errands?
A An old pick-up truck, yes.
Q Any others?
A Maybe, I don't remember.
Q Certainly we're not talking of a fleet of 10 or more automobiles; is that correct?
A I don't know.
Q You would remember if you had 10 or more company cars?
A Yes. I don't think we had 10 or more. I don't know the number, but I don't think it was -- I don't remember.
Q In 1983, did you give out bonuses to your employees?
A '83, I couldn't tell you, I don't remember.

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Q Well, as a practice did you give out bonuses at holiday times to your employees?

A I think so.

Q Do you recall a year when you didn't give a bonus out?

A I don't remember. '83, gees.

Q Well, let's make it a little easier, let's take it to '87. In '87 did you have a company car?

A Yes.

Q And who else had a company car?

A It would be hard for me to sit there and tell you everybody in 1987 who had a company car. I think by that time we had 100 employees and I couldn't --

Q So closer to the fleet of 10 automobiles I guess?

A I would assume between company cars and reimbursements for cars, yes.

Q Now by reimbursement for cars --

A Mileage, people driving back and forth. I couldn't tell you the specifics of each --

Q But generally it would be for mileage; is that correct?

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A I can't say it would specifically be for mileage.

Q I guess I'm confused. What else would it be for other than mileage?

A So that people would have a company car. Like I had a company car. And --

Q Okay. So we got the company cars and we've got mileage reimbursement. Is there any other sort of --

A I would assume that maybe -- I can't be real certain of this, but sometimes people got reimbursed for their car but then in turn they made their car payment. So it wasn't a company car and it wasn't mileage, they were just reimbursed for their car.

Q So it was a perk the company helped them pay --

A Yes.

Q -- their loans that they had on their car?

A Well, I don't know if it was for their loans or whatever. But the company gave them money to do whatever they wanted for their car.

Q I see. I presume in '83 you did the standard health insurance, life insurance sort of things for your employees?

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A I don't remember.

Q Do you recall having a conversation with anyone that they didn't have health insurance?

A I don't remember.

Q Did you have health insurance in '83?

A I don't remember. I think I did.

Q Well, did your wife have a baby in '83?

A Yes. Thank you. She had insurance.

Q So you had insurance also?

A Yes. Lightning rod time, thank you.

Q In '83, can you tell me a little bit about what sort of personal checking account you had?

MS. FULTON: Objection.

THE WITNESS: What do you mean?

BY MS. REILLY:

Q Well, I guess the first question is, did you have one?

A I think so.

MS. FULTON: Objection.

BY MS. REILLY:

Q What bank was it at?

A I don't remember.

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Q Was it at the same bank that your corporation was at?

MS. FULTON: Objection.

THE WITNESS: I don't remember, I'm sorry.

BY MS. REILLY:

Q Well, did you have a savings account?

MS. FULTON: Objection.

THE WITNESS: I don't remember.

BY MS. REILLY:

Q Were you putting away money for your kid's college tuition?

MS. FULTON: Objection. How is that relevant to the scope of this deposition?

MS. REILLY: Again, the scope of the subpoena is quite broad, given the fact that we have apparent reimbursements --

MS. FULTON: It is quite broad, but it doesn't go to where you are putting away money for your children.

MS. REILLY: It does go to the fact what accounts you had access to which is what the question is.

BY MS. REILLY:

Q Please answer.

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MS. FULTON: I would like to state a continuing objection to this line of questioning, please.

THE WITNESS: What was the question?

BY MS. REILLY:

Q Do you have a bank account that you were putting money into for your kid's college account?

A Not that I remember.

Q So you don't recall where your checking account was. You don't recall if you had a savings account.

Did you have any other kinds of accounts where you were putting your money?

A I don't remember.

Q Did you have a certificate of deposit?

A You asked me that before. I don't remember.

Q I'm trying to plumb your memory so you can recall.

Did your wife have a checking account?

A Yes.

Q She did? Was it in her own name?

A What do you mean, "her own name"?

Q In other words, the account was labeled Deborah Karl.

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A Yes, I think she did.

Q And she signed the checks from it?

A Yes.

Q Did she have a savings account?

A I don't remember. I don't know.

Q Let's see we have your savings account probably, and --

A I said I don't know. I mean I don't remember.

Q Well, do you recall writing checks in '83 other than corporate checks?

A Well, yes, I would think. I mean -- I can't sit there and tell you exactly, remembering writing one check for something, but --

Q Yes, sure, but you probably had a checking account?

A I probably had a checking account, yes.

Q And we're not sure about the savings account. But your wife apparently had a checking account?

A Yes.

Q Did you have access to any other accounts either in your name or in someone else's name?

A What do you mean?

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Q Could you write checks on any other accounts other than the ones we've discussed?

A The company.

Q Right. And any others?

A Like what do you mean? I'm trying to --

Q Actually I'm just trying to see if we've exhausted the realm of your financial activity for the year --

A I don't -- I mean the company had accounts and I had accounts, my wife had an account. I mean that would probably cover it. That's as much as I can remember sitting here in 1990, whatever day it is.

Q Okay. I'm going to make it easy for you again because I'm going to move to '88.

A Okay.

Q In '88 had your financial situation changed from '83 in terms of opening or closing accounts?

A How do you mean?

Q Well, did you -- we weren't able to establish for example whether or not you had a savings account in '83. Do you know if you had one in '87?

A I had one in '87.

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Q You did have one in '87?

A I think.

Q In '87?

A Did I have a savings account.

Q Yes.

A You mean like a savings account?

Q Right. Where you just sort of toss money into.

A I don't know. I don't remember. I mean -- do you have something that would refresh my memory? I don't know. I don't remember. I don't think so is what I'm trying to say.

Q Well, this might help you. When you got your check from Lorimar for a million plus, what did you do with that?

MS. FULTON: Objection.

THE WITNESS: In 1984?

BY MS. REILLY:

Q Right.

A I think I put it in a checking account.

Q So you probably did have a checking account?

A Yes.

Q But you don't recall the bank?

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MS. FULTON: I repeat my continuing objection to this line of questioning.

MS. REILLY: Noted.

THE WITNESS: May have gone in the bank in Newport.

BY MS. REILLY:

Q So your account may have been there?

A Yes. But I tell you I can't specifically sit here and tell you.

Q No, and we appreciate the fact that you are struggling to remember and we appreciate it is a long time.

In 1987 did you balance your checking account yourself?

A No.

Q That much you are sure of. Do you know who did?

A No. '87?

Q Yes.

A Well, I don't know if anybody did. I couldn't tell you.

Q How about '86?

A I had an accountant who may have worked on it.

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Q Well, do you ever recall balancing your checkbook?

A Me, personally?

Q Yes.

A Not that I recall. Do you balance your checkbook?

Q Frequently.

THE WITNESS: Do you?

MR. BERNSTEIN: No comment.

THE WITNESS: Do you?

MR. RODRIGUEZ: Are you kidding?

THE WITNESS: Let the record stand.

BY MS. REILLY:

Q I never made a representation that I got the right answer.

A Those bank charges catch up on you, so you have to do that.

Q That's the case. Let's switch gears a little bit.

Have you ever worked on any political campaigns?

A Can you be more specific?

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Q Yes. Have you ever stuffed envelopes on behalf of a political campaign?

A No.

Q Have you ever rung any doorbells?

A No.

Q Have you ever done any phone banking?

A No.

Q Have you ever raised any money for a political candidate?

A Yes.

Q Were they state candidates or federal candidates?

A Both.

Q And why did you raise money for state and federal candidates?

MS. FULTON: I object to any questions that have to do with state candidates.

MS. REILLY: Just for background stuff.

MS. FULTON: No, I'll object. That is definitely outside the scope of this deposition.

BY MS. REILLY:

Q I'm going to direct you to answer, please.

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MS. FULTON: I instruct you not to answer anything that has to do with state candidates.

MS. REILLY: We'll note it for the record and we'll get a judicial determination if we need to.

BY MS. REILLY:

Q Actually, Mr. Karl, I'm going to ask you, please, to answer the question.

MS. FULTON: No, I've instructed him not to answer.

MS. REILLY: But I want him to refuse to answer, if that's the case.

BY MS. REILLY:

Q Mr. Karl, did you make any contributions to state candidates?

(Witness conferred with counsel.)

BY MS. REILLY:

Q Please answer the question.

A On advice from my counsel I refuse to answer.

MS. REILLY: We'll mark that and we'll get a judicial determination if we need it.

THE WITNESS: Is it lunchtime yet?

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BY MS. REILLY:

Q Let's try to go a little longer.

When did you come to start raising money for federal candidates?

A I don't recall the exact date.

Q Was it before the asset sale to Lorimar?

A Don't you have something to refresh my memory? Because I don't recall the exact time.

Q Just sort of give us a ballpark figure.

A '83? '82? '83?

Q That sort of time period?

A Yes. When was the general election?

Q For 1984?

A Yes, was it in '83 or was it in '84 and --

Q So in other words you had general -- you have general elections in the even years, so it is '82, '84, '86, up to last night which was '90.

Had you always been interested in politics?

A How do you mean?

Q Did you follow political events?

A Can you be more specific?

Q Did you read about politics in the newspaper?

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MS. FULTON: Do you mean prior to this time, prior to '82?

MS. REILLY: In '82.

THE WITNESS: How do you mean?

BY MS. REILLY:

Q Well, --

A You can't open a newspaper without reading about politics.

Q No, I mean when you did open a newspaper, did you go to the sports page first or were you following politics with something other than casual interest?

A That's hard to characterize. I don't remember what my interest level was at the time. It is hard to say.

Q Well, we know you weren't stuffing envelopes or phone banking, that much is clear; right?

A Yes.

Q Did you vote?

A Yes.

Q And were you a Democrat or Republican in '82?

A I was a Republican.

Q And did you stay a Republican?

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A No.

Q You changed to becoming a Democrat; is that correct?

A Yes.

Q And when was that?

A I don't remember the date. I don't remember.

Q Why did you change from Republican to Democrat?

A It seems like a very personal question.

Q Well, it sort of is, but, were you --

A How is that relevant? I mean this is -- forget all lawyering. How does that relate to any of this? I mean this is like, wait a minute, don't I have a right to be anything I want?

So I don't have to answer why I am a Republican or Democrat, do I?

Q Well, it is sort of --

A Tell me why and I'll try to help.

Q It is sort of two issues, okay?

A Okay.

Q One, do you have a right to be whatever you want to be, you bet.

Two, you have to tell us the question because

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obviously there is a situation here that the allegation has been raised that you were contributing to various Democratic candidates, and it is sort of relevant to our inquiry why you decided to change.

A Say that again now?

Q In other words, at one point you were a Republican, right. And then there is an allegation made that suddenly you became very interested in Democratic candidates. And our question is why did you change, what was the reason for it?

MS. FULTON: Do you want a chance to confer for a minute?

THE WITNESS: Yes.

MS. FULTON: Off the record.

MS. REILLY: We're happy to go off the record but it has to be us saying it. So just let me know.

(Witness conferred with counsel.)

MS. REILLY: Back on the record. Could you read the last sequence of questions, please.

(The reporter read the record as requested.)

THE WITNESS: I like Democratic candidates.

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BY MS. REILLY:

Q Anyone in particular?

A What do you mean anyone in particular?

Q Well, did you suddenly love all Democratic candidates or were there some sort of stuck out in your mind?

A Well, Gary Hart obviously, Tom Hayden, I mean at the start.

Q Right. Anybody else at the start?

MS. FULTON: I would instruct you to limit your candidates to federal candidates that appealed to you.

A JFK, I began to get more interested.

BY MS. REILLY:

Q You mentioned Gary Hart is one of the people who attracted your attention. Did you meet Gary Hart?

A Yes.

Q When did you meet him for the first time?

A I don't know if it was '83 or '84. I couldn't tell you. One of those years.

Q Did you meet him at an event?

A Yes.

Q What event was that?

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A A reception at my house.

Q And that was the first time you had met him?

A Yes.

Q How did you come to hold an event at your house for Gary Hart?

A Someone called me and said would I be interested in doing it?

Q And who was that who called you?

A A guy named Denny Freidenrich.

Q I'm sorry, could you say that again?

A Denny Freidenrich.

Q Did Mr. Freidenrich previously ask you to host any activities at your home?

A I don't remember.

Q Had you previously hosted any political events at your home?

A Could I confer with counsel?

MS. REILLY: Sure.

(Witness conferred with counsel.)

THE WITNESS: Not federal.

BY MS. REILLY:

Q So we are to assume there were state ones; is

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that correct, there were state ones?

A Yes.

Q Who is Denny Freidenrich?

A "Who is Denny Freidenrich?" What do you mean?

Q Well, when he called you up did you know who he was?

A Yes.

Q Is he a person you know from your club?

A No.

Q Are we to assume that his children play soccer with yours?

A No.

Q How did you know him?

A I can't really remember how I met Denny Freidenrich.

Q Is he active in the video business?

A No.

Q What is his business?

A I really don't know. I couldn't tell you. Right now I couldn't tell you what Denny Freidenrich is doing.

Q Would you describe him as a businessman?

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A What do you mean? What is your definition of businessman?

Q Someone who works for a business in a white collar capacity.

A Yes.

Q Who does he work for?

A I don't know.

Q But he just called you up and said what?

A Boy, it's hard to remember. I don't remember the specific conversation.

Q Do you know if there was more than one conversation with him?

A I don't remember.

Q But in any event you did have a function for Gary Hart at your house?

A Yes.

Q Can you tell us a little bit about it?

A What would you like to know?

Q Well, who came?

A Boy, I can't remember.

Q Well, Gary was there; right?

A Yes. John Emerson was with Gary.

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Q And John Emerson, I'm sorry, is who?

A I think John Emerson. I can't -- I can't remember who was there. I think John Emerson. Just a guy who works with Gary, my wife. To sit there and look around the room I can't remember. I couldn't sit here and say these people were there.

Q Were there more than 10 people there?

A Yes.

Q Were there more than 100?

A No.

Q So it was --

A 15 to 25.

Q Was Lee Hart there?

A No.

Q Was it a fundraiser event?

A I believe so.

Q What's your basis for that belief?

A I think it was -- I don't recall, I wasn't involved in that side of the event. It was just more like I provided a residence. But I mean just speculation -- I don't know.

Q Well, who was involved in the -- you said you

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were only involved in providing the residence?

A Freidenrich was the organizer and I provided the residence.

Q Was it catered?

A Yes.

Q And who was the caterer?

A I think a company called Gentleman's Agreement.

Q Who paid for the catering?

A Probably me.

Q Did you spend any other money on this?

A I don't remember.

Q Do you recall a collection basket by the door where people would put the checks?

A No, I don't. That's what I was trying to think of and I don't remember that. That's exactly what I was trying to think of. I don't remember that.

Q Did you have a conversation with Gary Hart that day?

A What do you mean by conversation?

Q Did you talk to him?

A Yes.

Q What did you talk to him about?

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A I don't remember.

Q The first time you met Gary Hart you don't remember what you even talked to him about?

A I really don't remember.

Q Did he thank you for letting him use your house? Did he know it was your house?

A Yes.

Q He did, okay. Did he stay with you?

A No.

Q How long did the event last, timewise.

A An hour and a half.

Q And did Gary make a speech?

A Yes.

Q Do you remember the speech?

A No. I remember where he stood.

Q Where did he stand?

A In the corner of the room in front of the fire place.

Q Not a terrifically memerable experience?

A Well, I remembered it. I couldn't tell you the specifics of it.

Q Other than it happened?

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A Yes.

Q Did you have valet parking that day?

A I don't think so.

Q Small enough group you wouldn't need it?

A I don't think I did. I don't remember.

Q Well, when did you next see Gary?

A I don't remember.

Q But you do recall seeing him again?

A Yes.

Q Did you come to see him during 1983 on a regular basis?

A No, because I don't even know if this event was in '83 or '84. Remember earlier I mentioned some, you know, I don't want to --

MS. REILLY: Let's go off the record a second.

(Discussion off the record.)

BY MS. REILLY:

Q Let me see if I can sort of refresh your recollection in another way. Did you make a contribution to Gary Hart?

MS. FULTON: Can you clarify the time frame?

MS. REILLY: I'm sorry. Yes.

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BY MS. REILLY:

Q In 1983.

A Do you have something that would help me remember?

Q Actually yes. I'm not sure necessarily we'll make this as an exhibit. But just take a peak at that.

A You are helping me in more ways than one. I may have. Is this what you are saying this check was for? I mean it --

Q No, no. I'm not trying to push you one way or another. But let me just --

A I don't remember doing this or not doing this. I just --

Q Let me just describe the check for the record. It is a Karl Video Corporation check --

A I haven't seen one of these in a long time.

Q -- it is for $302 and no cents. It indicates under explanation that it is for "Americans with Hart," a cashiers check. It appears to be drawn on the Imperial Bank.

A Imperial Bank?

Q The date is April 26, 1983. And --

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A Where did you guys get this check?

Q I can't really tell you.

A Where would you get a check like this? Just for my own knowledge.

Q Does this refresh your recollection regarding your contributions to the Hart Campaign?

A No, I can't remember.

Q But the date is April of '83?

A The election you are saying was in '84?

Q Right.

A Okay, so that would have been in '83.

Q Well, do you recall making a contribution around the time of the event or before the event or --

A I don't -- I mean -- you are asking me to speculate. I don't want to speculate.

Q You don't have any sense of -- at the time Gary Hart was in your living room --

A I can't remember doing that.

Q -- whether or not you had contributed or not; right?

A I can't remember.

Q You weren't introduced to him as a contributor,

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for example?

A I don't remember how I was introduced to Gary.

Q But in any event you came to see more of Gary Hart; is that correct?

A How do you mean?

Q Well, we've seen once so far that we've documented; right?

A I have seen him more than once.

Q Do you recall any of the instances that you did see him?

A When?

Q Let's try the rest of that year, 1983?

A I don't remember seeing him in '83. It doesn't mean the I didn't, but I don't remember.

Q Now, in 1984, it's an election year, and let's see, the New Hampshire primary is February of '84 and the Iowa caucuses are in pre-February '84. Do you recall seeing --

A Is that January, preFebruary?

Q I tried to come up with a date and I couldn't recall. It is contagious.

But in '84 did you see more of Gary Hart then as

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the presidential year or --

A I saw him more that year.

Q Where did you see him?

A I remember seeing him at the Mayflower Hotel.

Q In D.C.?

A Yes.

Q When was that?

A I don't remember that.

Q Was it cold in D.C. when you were here?

A Yes, it was snowing.

MS. FULTON: That's probably February.

THE WITNESS: It was snowing. It was one of the -- I won't speculate. I was going to say maybe Super Tuesday, whatever that is. Maybe not. Whenever that was, I don't remember the date.

BY MS. REILLY:

Q March '84. Any other time?

THE WITNESS: Does it snow in March in Washington, D.C.?

MS. FULTON: It can.

MS. REILLY: Yes, it can.

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BY MS. REILLY:

Q Okay. So you saw him at the Mayflower in '84. Did you see him in California at all in '84?

A Yes.

Q Do you recall some of those instances?

A Fundraiser in Los Angeles and of course the Democratic convention in San Francisco.

Q Any other times?

A Yes. I saw him right prior to the June primary.

Q The California primary?

A Yes.

Q Where did you see him?

A Where?

Q Yes.

A In California. Long Beach and San Francisco.

Q Was he at a function?

A He was on his way to film a commercial in San Francisco.

Q How did you come do meet him as he was in transit?

A They said that's where he would be.

Q Did you meet with him that day?

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A How do you mean meet with him?

Q Did you have a conversation with him?

A What kind of conversation?

Q Did the candidate say, "hello, Stuart"?

A Yes.

Q Were there other people there?

A Yes.

Q Roughly how many?

A When? During the course of the day anywhere from 10 to 50, casts of thousands, I mean, you know, it was a motorcade to film the commercials.

Q Were you involved in the film filming?

A How do you mean?

Q Were you with the candidate as he filmed?

A I was watching the taping, yes.

Q Were you with the candidate the entire day that day?

A No.

Q About how long roughly did you spend with him?

A An hour and a half.

Q And this is at the taping site?

A Yes. There were actually two taping sites. One

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in Union Square and one down at the Beach. So there was an unbelievable entourage.

Q Did you get to ride in the motorcade?

A Yes.

Q Did you ride in the candidate's car?

A No.

Q Were you there as an advisor when you got in the commercial?

A How do you mean?

Q Did you give advice regarding camera angles or way to shoot a scene or what the candidates should say or things like that?

A No.

Q Did you give any advice at all?

A That day?

Q Yes.

A Not that I remember.

Q And other than your conversation of "hello, Stuart," did the candidate say anything else to you?

A I don't remember. I really don't remember.

Q Did you help write the script?

A No.

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Q Did you see the script before you got there?

A No.

Q Was there a script?

A I don't know.

Q And you saw the candidate at the convention in '84. Did you see him in the time period between the convention, which is July '84 through the general election which would be November of '84?

A I don't remember. I don't remember.

Q Did Gary Hart know you by name?

A Ask him.

Q We have, but --

A What did he say?

Q My question is to you.

A What did he say?

Q I can't speculate what he --

A You can't speculate, but you said you asked him.

Q I'm sorry, could you repeat your answer? I missed it. Did Gary Hart know you by name?

A That's a weird question to answer, I don't know.

Q Well, did he call you by name?

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A Yes.

Q Did you consider him to be a friend?

A What is your definition of "friend"?

Q Was he someone who you had his home phone number?

A When?

Q Any time.

A Did I have his home phone number? Yes, I think I did. I think. I think.

Q Did you ever stay at Gary Hart's house?

A No.

Q Did you ever visit at his house either -- let's say in D.C.

A No.

Q Did you visit his ranch in Colorado?

A Yes.

Q And how many times?

A One time.

Q When was that?

A I don't remember.

Q Was it after Gary Hart had not secured the nomination in '84?

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A Yes.

Q Did you visit him when you came to Washington, D.C.?

A Yes.

Q And you went to the Senate office?

A Yes.

Q And did you have lunch with him?

A Yes, well, in the Senate dining room I guess. To eat in the Senate dining room you have to be a senator. Is that right? You have to be a senator to eat in the Senate dining room? I don't remember exactly. I think I did have lunch with him.

Q Any meals with him while you were in D.C. other than that lunch?

A Not that I remember.

Q When you first had this event at your house, what did you know about the Federal Election campaign laws?

A Next to nothing.

Q By "next to nothing," does that imply you knew something?

A That means I knew nothing.

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Q Absolutely nothing?

A Absolutely nothing.

Q Did you come to learn a little bit about them?

A What do you think? I don't mean to be flippant, yes, I've learned more about it. I don't mean to be flippant, I apologize.

Q But at that time when you were sort of starting off, having this event at your house, did you ever sense that there was -- that any sort of activity could be illegal or prohibited?

A Did I sense that? No.

Q No idea at all?

A No.

Q Did you come to learn that there are limitations on how much an individual can spend on a federal candidate?

A Yes.

Q How did you come to find that out?

A How did I come to find that out? It is hard to remember when I first found that out.

Q Well, do you know today that there are limitations regarding how much money you can give?

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A Yes.

Q What is your understanding of what that limitation is?

A What is my understanding?

Q Yes.

A $1000, a -- $1000 or $2000.

Q Did the Hart people provide you with any sort of advice regarding what was legal or illegal regarding the Federal Election campaign laws?

A That's a pretty broad question. How do you mean?

Q I want it to be sort of broad. Did they tell you anything at all regarding Federal Election campaign act?

A You mean who? When? Or --

Q No, just sort of generally. Did they give you a publication?

A No, not that I remember.

Q Did you have any conversations with anyone of the Hart people regarding limits?

A When?

Q Any time.

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A I think there were but I can't remember specifically when.

Q Let me see if I can do a little bit refreshing of your recollection.

MS. REILLY: Let's go off the record one second.

(Discussion off the record.)

BY MS. REILLY:

Q At this point I'm going to hand to the court reporter and she'll hand to you what we're going to have marked as Karl Exhibit 1. And I'm going to ask you to take a moment and just review this two-page document, please.

(Karl Exhibit 1 identified.)

(Witness reviewed document.)

BY MS. REILLY:

Q Have you had a chance to review this document?

A Yes.

Q Do you recognize it?

A How do you mean, "recognize it"?

Q Do you remember getting it?

A I don't remember getting it. This is 1984.

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Q Well, let's turn to the second page of it and there is a check there. Do you recognize that check?

A How do you mean recognize?

Q Well, see the little notation at the bottom it says "Carol King concert." Do you remember writing a check for the Hart people for the Carol King concert?

A No. I don't remember writing the check.

Q This purports to be an April 13th, 1984 letter addressed to Stuart Karl signed Charley Dobbs. And I'm going to ask you if you could just review the first paragraph of it, please.

A Yes.

Q And this is essentially returning a check for $200 that you made apparently payable to Americans with Hart. It states that unfortunately you have maxed-out.

Does this refresh your recollection regarding when you came to know about the contribution limitations?

A No.

Q The phrase "unfortunately you have maxed-out" doesn't have any significance to you?

A I don't remember when.

Q But certainly the fact that they returned a

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check to you on April 13th, 1984 would indicate to you that there were limits of some sort; is that correct?

A Yes.

Q And Charley Dobbs, do you know who he is, the guy who signed the letter?

A No, maybe a she.

Q What is your basis for saying that?

A I don't know. For some reason. I don't know why I say that.

Q Well, it says here in the same first paragraph "if there is any way you can replace this" -- referring to the check -- "with someone else's check/contribution, we'd appreciate it."

What did you understand that to mean?

A I don't know. This is 1984. This is a long time ago. I don't even remember reading the letter as I mentioned earlier. So it is hard for me and I don't want to speculate.

Q So you don't regard this as an invitation from the Hart people to ask you to give the money to someone else and write a check?

A I don't know how to answer that question.

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Q Well, did you have any conversations with the Hart people regarding this letter?

A Not that I remember.

Q You didn't call anyone and ask some advice?

A I don't remember.

Q I'll ask a more general question and it might help.

If you had a question regarding what was legal or what was not legal regarding federal campaigns, who would you call?

A I had an attorney at the time. I don't remember his name right now.

Q Does Bagatelos ring a bell?

A Yes, thank you. Peter Bagatelos who I thought was -- who I think was -- I think, and I can't recall, because it was reviewing some of this stuff.

Q Just to pursue this a little bit more, did you know that corporations were precluded from making any contributions whatsoever in federal elections?

A I don't remember if I did or didn't know that.

Q At some point you found out that was the case, yes?

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A Yes.

Q Did you find that was the case before you received a "reason to believe" determination from the Commission?

A Say that again?

Q The Commission sent you a letter that says that there is "reason to believe" that you violated the act. That is how we begin this sort of an investigation and how you sort of got here today. And one of the things that they send you when they do that is something called a factual and legal analysis. And one of the things that your factual and legal analysis discussed was the fact that it is illegal for a corporation to make contributions.

A Do you have a copy of this letter?

Q Sure.

A Can I see it?

Q Let's go off the record a second.

(Discussion off the record.)

BY MS. REILLY:

Q We went off the record to provide Mr. Karl with a document which we hope will refresh his recollection.

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This purports to be a March 4, 1988 letter from the Federal Election Commission addressed to Stuart Karl, certified mail, return receipt requested, signed by Thomas Jsefiak who is the chairman of the FEC.

The enclosures note that this letter includes a factual and legal analysis, and in fact at page 11 there is something entitled "factual and legal analysis addressed to Stuart Karl." And what I've marked at page 18 is a section under subheading 2 entitled "corporate contributions."

I'm going to ask you if you can take a peak at that and see if that refreshes your recollection.

A It doesn't help my recollection.

Q Well, do you recall receiving communication from the Commission indicating that you may have violated the law? That there was reason to believe the act had been violated?

A Well, I don't specifically remember getting this, it is the wrong address, but B, I'm sure I got it. And C, I probably sent it to the attorneys.

Q So you are unable to refresh your recollection regarding the ability of corporations to make

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contributions?

A Obviously it appears -- as it says in the document, it is unlawful to do that. Am I correct?

Q Right, that's correct. And really what the question is, did you know that fact prior to getting the Commission's "reason to believe" determination which was sent out March 4, 1988?

A I can't tell you when I did or didn't start knowing this stuff. I mean it's --

Q Did you sort of pick it up as you went along?

A Well, it started coming along real fast.

Q I'll bet, but before that?

A I can't recall, prior to when it all started coming fast.

Q Well, did you know that you couldn't write checks from Karl/Lorimar to Gary Hart?

A Well, my general sense is that -- well, I don't want to speculate.

Q Well, try. Maybe that will help you sort of refresh.

A Maybe I shouldn't try.

Q What about -- did you have any sense there was a

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limit in how much you could give in a year to a candidate?

A I don't recall a lot of when's and details and all that.

Q Did you ever know it?

A Did I ever know it?

Q Right.

A I know it now.

Q Then we can go back and say at the time that you received the Commission's "reason to believe" determination did you know it?

A I think I was beginning to become aware of it. I can't give you an exact time.

Q Well, of course you knew about the thousand dollars at some point, that that was the limit?

A Yes.

Q Did you know that you had to use your own money to make a contribution?

A How do you mean?

Q When you wrote a check to a committee, did you know that the money you used --

A When I did it, or now? Now I obviously know that.

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Q Right. But at the time that you did it --

A I don't recall at the time if I did or didn't know.

Q Well, if you didn't know that, why didn't you just write the checks yourself?

A You are helping me recall.

Q Okay, good.

A You have to understand, this is a very confused area for me because of everything that has gone on. So I mean it's -- what's your question?

Q Well, we're trying to decide if -- trying to reach a consensus regarding whether or not you knew that when you made a contribution it had to be with your own money. And you're, I think, not quite certain when you knew that.

And my question is if you didn't -- if you thought it was okay to use someone else's money to make a contribution, why would you make contributions in the name of other people?

A Can I talk to my counsel on this?

MS. REILLY: Sure. Off the record.

(Witness conferred with counsel.)

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(Discussion off the record.)

BY MS. REILLY:

Q Let me see if I can rephrase the question. We were discussing essentially two limitations. There is a $1,000 limitation for a candidate, and then there is the $25,000 a year limitation which is what I was alluding to regarding whether or not if you knew that there was a limit and how much money you could give in a given year.

My question is, if you didn't know there were limitations, why were you -- why would you write checks and then -- I'm sorry, strike the whole thing.

You didn't know there were limitations, why were you paying people cash to write checks in their own names?

A I guess you could say at the time I probably knew there were limitations. You asked me specifically if I recalled when and if I did I couldn't sit here today and tell you I did or didn't.

Q But at the time of the reimbursements you did because you wouldn't have done it otherwise?

MS. FULTON: Do you have some specific experiences in mind? We would really like a foundation for this kind of questioning at this point. I'm going to

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have to object.

MS. REILLY: And I note your objection. And actually we will go through this in greater detail later. This is kind of background stuff.

BY MS. REILLY:

Q Have you ever read any campaign guides put out by the Federal Election Commission?

A Not that I remember.

Q Did you attend any seminars sponsored by the Commission?

A No, not that I remember.

Q Did you attend any seminars or meetings where Federal Election campaign laws were discussed?

A I'm just trying to recall general meetings of finance committees, when you have these meetings I'm sure that Federal Election things were discussed. Do I recall any of those what was discussed, I don't recall.

Q And if you had a question regarding whether or not an activity was okay, was there someone in the Hart committee that you would call?

A In the Hart committee that I would call?

Q Ask their advice.

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A Not that I recall asking anybody specifics. I mean I talked to a lot of Hart people on a regular basis.

MS. REILLY: On that note why don't we go to lunch. Off the record.

(Whereupon, at 1:00 p.m., the deposition was recessed, to be reconvened at 2:15 p.m. this same day.)

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AFTERNOON SESSION (2:20 p.m.)

Whereupon,

GEORGE STUART KARL

resumed the stand and, having been previously duly sworn, was examined and testified further as follows:

BY MS. REILLY:

Q We're back from lunch, and we hope we can pick things up a little bit here.

At this point I'm going to hand to the court reporter what we're going to mark as Exhibit 2. And I'll ask her to please hand this to the witness. And then for you to take a moment and look this over please.

(Karl Exhibit 2 identified.)

(Witness reviewed document.)

BY MS. REILLY:

Q Have you had a chance to examine the document?

A Yes.

Q Do you recognize it?

A Yes.

Q Can you describe it for us?

A It is a letter from the Stein/Brief Group to Oliver Hinkel and Doug Rosen, Americans with Hart in

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Washington, D.C. It says "dear Pudge" -- well, Oliver Hinkel.

It said Pudge in here somewhere, didn't it?

Q Yes, it did.

A Signed by David Stein.

Q The first paragraph it refers to -- to you and to Bernie Schneider and the author of the letter who apparently had been working for more than a year to raise funds and build support for Gary Hart.

Can you tell me a little bit about your involvement with these two gentlemen in the Hart Campaign?

A How do you mean, "involvement"? I mean David always was -- how do you mean "involvement"?

Q Okay, what did -- let's start at the beginning.

Who is Bernie Schneider?

A Bernie Schneider is a lawyer with Buchalter, Nemer, Fields law firm, who represents David Stein. And which, I understand, represents Americans with Hart also now.

I don't know what he did then. But he's an attorney from Orange County.

Q And David Stein is who?

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A Orange County developer.

Q And the Stein/Brief Group who is at the top left corner, what is that?

A That's David's company.

Q And the letter refers to activities that the three of you apparently conducted in Orange County for the previous year.

What was David Stein referring to, your activities?

A I don't know specifically what activity he was referring to. My general recollection was this letter was him trying to somehow formalize positions with the Hart Campaign.

Q Well, during this past year, had you been out raising funds for Gary Hart?

A Not that I recall. I mean I may have. I may not have, again I think there was some events, I think we saw earlier.

Q Let's see. We had the one at your house; right?

A Yes, and this one is April, before this letter.

Q Right, that's the Carol King concert you were referring to, Exhibit 1.

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A I wonder if this was after. I don't know when this event was. (Indicating.)

Q Were you soliciting contributions from anybody?

A I may have been. I can't recall specifically a period of time. If you help me with recollections I'll try to more clearly --

Q Well, this is right before apparently -- the letter was sent out and there had been an attempt to formalize the relationship here. In the last paragraph, the last sentence of the first page it says "I've asked Stuart Karl to deliver this letter to you personally in order to obtain your authorization."

A That I don't recall, delivering it personally.

Q You don't?

A No.

Q Did you go to Washington in March of -- this would be in close proximity to --

A That may have been the date that I went to that Mayflower event which was a big fundraiser -- I mean finance committee supposedly.

Q So John Emerson, who is mentioned in the second to last paragraph on the first page, who is he?

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A John, he's an attorney from California who has been close to Gary. He ran the California campaign. I know that was kind of his title, head of the California campaign.

Q Now when you were in D.C. to attend the Mayflower event, did you go to the National Finance Committee meeting?

A That was the meeting.

Q The meeting was actually at the Mayflower?

A No. It was at the Mayflower, and that was a National Finance Committee meeting.

Q And roughly how many people were there?

A A couple hundred. It was a big meeting. In fact you can see it. They actually taped it. It is on that PBS Night Line spot where -- not that you want to cut to the tape, but it is on the PBS documentary, that actual meeting.

Q And Pudge Hinkel, who was he?

A He was the -- from what I understand, I believe he was the head of the whole campaign.

Q What about Doug Rosen?

A He -- this is where it gets confusing. Because

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I kind of thought he was the guy, in my opinion, was the head of finance for the whole campaign. There was another guy I think, but I can't remember his name -- I'm sure it will come up, but there was another guy too that was involved in finance. But Doug was the guy that I was interfaced with as head of finance.

Q He was the person that you dealt with most frequently on financial type stuff?

A Yes.

Q Can you tell me a little bit about the kind of discussions you would have with Doug Rosen?

A Could you be more specific.

Q Actually, could you sort of give me sort of a general overview of the kinds of things that you would discuss with him?

A Well, we got to raise a lot of money, we got to buy media time, Gary is going to make a difference, and, you know, it's we're going to get there, and that kind of stuff, like we need lots of money. Some levels it was very condescending.

Q How so?

A I don't know, I just sensed that. You know,

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just an impression I would get. Like you know, everybody can contribute and we got to get you close to the candidate, and all that kind of stuff. I just sensed, it was a general feel. Kind of in essence, he was the guy who pretty much gave me directions or impressions of raising money.

Q Now, was Rosen a young guy?

A What do you consider young?

Q Was he under 30?

A No.

Q Was he about his 30s, 40s?

A Late 30s, 40s.

Q Young. So this is March '84, it's the year that Gary is going for the nomination for the first time, seriously anyway. And you and Bernie and David Stein, are you concentrating just your efforts in Orange County?

A Let me characterize something. We never sat down, like the three of us and had like pow wows.

I mean, you know, David and Bernie spent a lot of time together. They had a business relationship and the personal relationship. They were very up on politics. David has been involved in politics in Orange

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County.

Bernie is an attorney who I think is, you know, like very much involved in politics. So it wasn't -- I want to be careful not to characterize this as like a triumvirate where the three of us would sit around. I mean I was always going -- I can't probably remember, I'm sure there was a time, but I can't remember where the three of us sat down and plotted at Orange County campaign strategy.

Q Did you do a lot of sort of informal telephoning back and forth is how it worked?

A Not really. I mean I interfaced more with Rosen in the national office than I did with either of these two guys.

Q What about -- is the name Mike Novelli familiar to you?

A That's the name. There is still another guy too.

Q Now, let's be sure what we're defining before I give you the names. Novelli was also the person who you understood to be in charge of financial things for the Hart people?

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A He would have had a finance position. But again I guess you could say my handler was Rosen. I didn't really interface much with Mike Novelli.

Q Rosen was the person who you spoke with most at the national office?

A That's right.

Q And you would speak occasionally with Novelli about financial type of stuff?

A I can't remember any discussions with Novelli of financial stuff or --

Q But you knew him by face?

A Yes.

Q And he knew you by face? Doug Stuart?

A You know, that's hard to say. I have an interesting viewpoint if they really knew you or not. That's another book.

Q Actually what is your viewpoint on that? Do you think they don't know who you are?

A I don't know. I don't want to speculate.

Q Did Rosen work out of the national office, is that where you would call them?

A I don't think he had one central location. I

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mean I -- to answer your question I don't know where he worked out of. I knew he was always on the road it seemed like. A lot of times he would be at my office. A lot of times he would be in Los Angeles. A lot of times he would be in Washington. I mean, he never had one place I could call up Doug Rosen at.

Q Is he from California?

A Is he from California? What I know about Doug is he lives in California. I don't think he is from California. I think he's from Boston or New York.

Q And you said that he was around your office?

A Yes.

Q Can you tell me a little bit about that?

A How do you mean?

Q What was he doing when he was at your office?

A I sensed Doug -- which he subsequently did -- always wanted to go in the video business after the campaign stuff, which he did. And so I think he had more than just a political interest in hanging around our office.

Q Did he do political stuff while he was there too?

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A How do you mean?

Q Was he making telephone calls to contributors?

A Doug Rosen was constantly on the telephone. I mean who he was calling I didn't listen over his phone. But I mean he kept a book this thick and he was always on the phone. That's Doug Rosen. Who he was calling, I don't know.

Q Would he spend like big chunks of time at your office, hours?

A How do you mean? Like would he show up just specifically to hang out at the office?

Q Yes.

A He didn't do that. Because our office was in Orange County, you see. So I mean to come to our office, you know, you drove. It is like you just didn't happen to be in the neighborhood. So probably drove down, talked to me or, you know, promote me to raise more money or do things.

Q So Rosen was the guy that you talked to about raising money; is that right?

A Yes.

Q Can you tell me a little bit about those

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conversations?

A How do you mean?

Q The first conversation you had with him about --

A It is hard to tell you what conversation. I know I talked to Gary Hart at my house in December of '83. It would have been about getting ready in January and then I think Pudge called me and Doug Rosen called me, which I may have some notes somewhere, I may have, I don't know. And then Rosen would show up and -- well, I don't remember our first conversations. But he -- you know, he gave me a general impression, you know, we talked earlier about was I or wasn't I doing the right thing, gave me a general impression about whatever I was doing, this is how it is done.

And, you know, reimbursements, lawyers, all their secretaries do it. So it was like, you know, -- it was a general attitude and feel about it. You have to understand at the same time I'm running a business, at the same time I -- the other thing I want to characterize, too, our business went from 7 to $96 million a year in about a year and a half period of time there. So on top of all this, we were, like, running real fast.

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Q So Rosen gave you the impression that it was --

A You know, it is hard for me to specifically say exactly when those conversations were. I couldn't sit there and say this is when it was and this it exactly what it --

Q Well, even though you can't tell me when it happened, do you recall that it happened?

A I recall that it happened.

Q I'm trying real hard to see if I can get you to remember this. So bear with me.

A I tell you I had other people sit across the table, as you are probably aware of, and tried real hard and I'm trying to be real clear. I can't specifically remember times and dates other than the fact that I remember those general impressions. You know I have had --

Q Other federal people?

A Yes.

MS. FULTON: Who remain nameless.

THE WITNESS: Well, it could, and without perjuring myself, I would tell you exactly. I'm trying to help as much as I can to clearly remember times and dates

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and places. I'm just trying to give you a general feel of the impression that I was given.

BY MS. REILLY:

Q So Rosen is hanging around your office; right?

A Well, not hanging around. He would come down, I'm sure he came down for an appointment to have lunch, he couldn't just hang around my office. It wasn't like he just came by, he was an hour south of L A.

Q But there is Rosen in your office and was he aware of the fact that your employees are making contributions and then being reimbursed by you?

A I think it would be safe to say that I got the general feeling of how to do it or what to do from him. I can't specifically tell you time or date or place, but it is not something that I in my heart figured out.

Q So it is your testimony that this is not an idea you would have come up with by yourself?

A Yes, that's my testimony.

Q And that you believe that it is Doug Rosen who was the person who most likely gave you the idea?

A And again, I'm trying to be real honest that I can't specifically, you know, and it is a tough one for

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me, because, you know, I'm just telling you that it was a feeling that I was given, I mean I do remember a conversation where somebody, and I'm almost 100 percent certain, that it was him, that, you know, law firms, all the secretaries do it.

Q And by "do it," they meant --

A They give and then the law firm gives money back to it.

Q And this is regarding presidential campaigns?

A Well, it was the one that I was involved with with Doug Rosen.

Q Do you recall having a conversation with Mr. Rosen on an airplane that one time discussing this, on a trip from the East Coast to the West Coast?

A Doug was on an airplane a lot we me, I mean --

Q Right, but does this somehow refresh your recollection regarding reimbursements?

A I feel that conversation was in a parking lot outside my office. I don't feel it was in an airplane. It may have been in an airplane or --

Q Or there could have been more than one; right?

A I don't know if there was more than one.

Airplanes are loud.

Q Okay. So it is your impression that Rosen knew reimbursements were going on; right?

A Yes.

Q Is it also your impression that Rosen knew that the corporation might be undertaking activities regarding Gary Hart?

A Yes.

Q We sort of covered the sense of Rosen -- it's your sense that Rosen was the one who gave you the idea for this. Did you ever discuss it with him after the fact?

A I want to characterize, it wasn't like it was an idea. It was like this is how it is done.

Q Procedure almost?

A Yes, I mean -- let me clarify that. It is not like that's a good idea, let's do that. It was like --

Q Business as usual?

A Yes. It was like this is how it is done. We want to characterize it. It wasn't like a red flag per se. It was --

Q Well, in his statement to you that law firms do

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it all the time --

A I think he was the one that made that statement. And again -- I would love to remember that exact conversation, dates and times and places, but --

Q Did you have a sense that -- well, did you have any discussions with anyone else involved with the Hart Campaign regarding the reimbursement situation?

A Not that I can recall.

Q And here we're sort of I guess back to sensing or --

A I mean when?

Q Actually at any time.

A When all this started to come out in '88 was it?

Q Yes.

A I had a discussion with Bernie Schneider about it in his office.

Q And what was that discussion about?

A Let's talk about it, Stuart, I'm your attorney, I represent Hart, let's talk about it.

Q And what did you talk about?

A I'll tell you I don't remember. At that point I

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was like what's going on here. That's my state of mind. I mean that day. What a bad day. I proceeded to like almost die in my opinion from this whole stress from this whole thing. Let me tell you this was a shock in terms of the gravity of the whole situation. You know, I mean --

Q So was it your impression that you really weren't doing anything very different than what other people were doing regarding the Hart Campaign?

(Pause.)

Q I'm sorry, I missed your response?

MS. FULTON: Do you remember the question? Do you want it read back?

MS. REILLY: Yes, please.

(The reporter read the record as requested.)

THE WITNESS: The Hart Campaign or campaigns in general.

BY MS. REILLY:

Q I guess what I'm trying to figure out is, did you have conversations with anyone else, any place in time regarding these other people reimbursing their employees?

A Not that I can remember.

Q Okay. At this point what I'm going to do --

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A Can I take a minute to talk to my attorney?

MS. REILLY: Sure, absolutely.

(Witness conferred with counsel.)

BY MS. REILLY:

Q At this point I'm going to hand to the court reporter was is going to be marked Exhibit 3 and I'm going to ask you to please hand it to the witness and his counsel and I'm going to ask you to take a look at this.

(Karl Exhibit 3 identified.)

BY MS. REILLY:

Q Just for your information, this is a document that we put together with contributions which we believe to be associated with you. And it is a five-page document, and it has a number of people on it and I just want to run through it and see if you recognize some of these contributions and the circumstances under which they were made.

MS. FULTON: Could I ask for a point of clarification?

MS. REILLY: Sure.

MS. FULTON: This is something that has been done by you all recently?

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MS. REILLY: Right.

MS. FULTON: On the basis of?

MS. REILLY: Mounds of documents, essentially. And last, for point of clarification, it is also drawn from materials on the public record these committees would end up reporting.

So mostly materials also in the public record and it is not necessarily exhaustive. But it is sort of our best guess.

MS. FULTON: I'm sorry, I've forgotten the question you asked him in relation to this document.

MS. REILLY: I don't think there is a question pending.

MS. FULTON: You just asked him to review it?

MS. REILLY: Right.

(Witness reviewed document.)

BY MS. REILLY:

Q Have you had a chance to review it?

A Yes.

Q Mr. Karl, did you have occasion to solicit your employees for contributions to Americans with Hart?

A Yes.

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Q What can you tell me about that first solicitation?

A I don't remember. I mean I don't --

Q Well, let's look at the first sort of group of contributors starting with Elizabeth Baughman down through Harold Weitzberg on the first page, okay? Now, the receipt dates of the checks that we've seen or have information from the committees about show contributions were made between February 3, '84 and April 25, 1984.

Are all these individuals employed by you?

A Now?

Q No. In February of 1984.

A A few aren't.

Q And who was not?

A Betty Anne Weir was not, neither was Janis Klinger.

Q Did Janis Klinger come to be employed by you?

A She was a contractor. She wrote music for various projects.

Q So she was someone who was in and out of your office?

A No, I don't think she was ever in our office.

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Q And Betty Anne Weir?

A Just a family friend.

Q Is she involved with any business dealings with you?

A No. Just a family friend. I mean I used to go out with her daughter for seven years.

Q That would be Alison Weir?

A Heather. I don't think Heather ever did anything, did she?

Q Not that I ever found out.

The people listed here, are these persons who you solicited for contributions and reimbursed them?

MS. FULTON: Can we divide that into two parts?

MS. REILLY: Sure.

BY MS. REILLY:

Q Part 1, did you solicit these persons for contributions?

A I must have, I can't recall specifically but I must have. I mean again I don't remember, I couldn't tell you specifically walking in and doing it.

Q Well, is there anyone on this list who you can say you did not solicit for contribution?

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A No.

Q Did you reimburse these people for their contributions that they made between February 3rd, 1984 and April 25, 1984, contributions were made to the Americans with Hart committee?

A I'm sure some of these people were reimbursed. I couldn't sit here right now and tell you specifically some were.

Q Okay, let me ask you this. Are there any on this list who you know you did not reimburse?

A Boy, that's hard for me to -- that's really hard to --

Q Just do your best guess, that's all we want.

A I don't want to guess.

MS. FULTON: For clarifications, are we talking about --

MS. REILLY: Contributions, 1 through 14 --

MS. FULTON: -- this time period?

MS. REILLY: February 3, '84, April 25th, '84.

THE WITNESS: I don't remember specifically. My general impression is the majority were reimbursed.

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BY MS. REILLY:

Q My question to you is looking at this list of 14, is there anyone that you can say absolutely you did not reimburse?

MS. FULTON: Why don't you take a moment and look at this, Stuart, and see if you remember.

THE WITNESS: I don't remember. I don't remember. This was way back. I don't remember.

BY MS. REILLY:

Q But at minimum you were convinced that the majority of them were reimbursed?

A Yes.

Q Is there anyone on this list who was more likely to be reimbursed than other people on it?

MS. FULTON: Could I ask for a clarification? You mean, is your question is there somebody on here that Mr. Karl remembers was more likely a person to be reimbursed?

MS. REILLY: Right.

MS. FULTON: According to his best recollection, these people were likely to have been reimbursed?

MS. REILLY: Yes.

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THE WITNESS: That's what I stated.

MS. REILLY: Right.

BY MS. REILLY:

Q And we're just trying to see if we can get -- if it's the case that it is all of them or most of them or --

A You are trying to get me to say all. I would love to answer the question any way you want me to answer it. But you ask me to tell you the truth. And the truth is I don't recall exactly if all were. As much as I would love to do that, you are asking me if I recall in 1984, in 1990 dates, if I reimbursed all these people. I can specifically tell you I don't recall doing that.

Q Each specific one?

A Right. A general feeling was I reimbursed the majority.

Q Because there is no question about the fact that you did in fact reimburse contributions during this period?

A Yes, there is no question about it. Which brings me to another point, but nevermind, I won't get off on that.

Q Just in terms of clarification, I really want

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you to tell me the truth. There is no right or wrong answer. Just whatever happened. I don't want to badger you into saying something that isn't the case.

Let's go off the record for five minutes.

(Discussion off the record.)

BY MS. REILLY:

Q While we were off the record we had a discussion regarding essentially the physical process by which these contributions were reimbursed. And so I will ask the witness a series of questions regarding what we discussed.

Mr. Karl, did you personally go about soliciting people as a general rule for contributions?

A From time to time, yes.

Q For people who were going to be reimbursed for their contributions, would you know ahead of time whether or not someone was going to be solicited with the representation that they would be reimbursed?

A I think that was made clear on numerous occasions, yes.

Q And would your assistant, Rama, actually go about physically soliciting people?

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A Yes.

Q And how did she know which people to solicit for contributions?

A I can't recall doing it, but I think we discussed it in advance.

Q You did? There were a group of people that were selected and it was her job to go around --

A Yes.

Q -- and collect checks? When she collected the checks, what happened to them then?

A The checks?

Q Yes.

A I'm sure they were sent to the Hart Campaign.

Q Was that also her responsibility to send them out?

A I think so. I can't -- I didn't do it. At least I don't remember doing it.

Q And after the checks were collected, as a practice would the employees be reimbursed?

A As a general rule, yes.

Q And how would they be reimbursed?

A I guess Rama would give them cash or reimburse

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them.

Q Where did Rama get the money to reimburse them?

A Probably out of one of my bank accounts.

Q And during this time period how many bank accounts did you have?

A I told you I don't remember that.

Q Would it be the corporation's bank account she was getting the money from or from your personal bank account?

A I couldn't tell you which one.

Q Did you use them sort of interchangeably? Did you do personal stuff on the corporate account and --

A I don't recall. I don't recall what accounts they came out of. I really don't recall.

Q You don't recall one as opposed to another?

A No.

Q And am I correct in saying that there was no sense that one account had to be used as opposed to another?

A I don't recall having that sense.

Q Did you really care where the money came from to reimburse the employees other than that it was from an

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account that you controlled?

A Well, I won't characterize that I was real flippant about not caring what account it came out of. I mean, I think that's a wrong characterization. I don't think I addressed it. It was not a matter of caring or not caring, I don't think I addressed it.

Q But did it occur to --

A -- or I don't remember addressing it. It may have occurred to me, I really don't remember.

Q Okay, let's turn to the -- what we're going to call the second group of contributions here and it begins -- it is headed "Mid-1984" on page 1. So you have Pierre Loubet, George Unwin, Alison Weir, and Rama.

And these are contributions occurring between June 1, '84 to October 13, 1984 to Americans with Hart. Were these contributions also reimbursed?

A I tell you I can't tell you.

Q And again we go to the second question which is do you have any reason to believe any of them were not reimbursed?

A You know, my instinct tells me due to the amounts of these and the timing these weren't reimbursed.

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But I couldn't say they were or weren't. I mean Pierre Loubet is the type of person who would not want to be reimbursed. Unwin, Weir, and -- I sense that maybe these may have been given without reimbursement. I mean that's --

Q Now, was there a fundraiser going on at this time?

A No, this looked like right around June primary when a lot of pressure was being put on a lot of people to raise money. That was when they needed the most money from what I understand.

Q And were you one of those people who was being pressured to raise the money?

A That's an understatement.

Q Tell me a little bit about it? Seriously, who was pressuring you?

A Specifically I couldn't tell you. Obviously Mr. Rosen would call me. Again he was the interface, you know, I couldn't tell you beyond that. But my just general sense is we're on a roll, June is coming, we got to do it, get money.

Q I hate to beat a dead horse, but how was the

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pressure being exerted? Was he calling -- was Rosen calling you on the phone?

A Yes, he probably called.

Q Did he drop by to the extent that he did?

A I don't even remember what I looked like in 1984. Let alone who called me and --

Q But the pressure that you felt, where did it come from?

A Probably from Doug Rosen.

Q Anyone else?

A Well, this gets right -- when was the convention?

Q The convention was July '84.

A In my mind it all runs together. There seemed to be a lot of pressure at that point. If I had to sit there and say to you today how I felt at the time, my best recollection was hounded.

Q "Hounded"?

A Now to tell you it was Doug or more than that it is hard for me to recall. There was some other people that I sense called, and I think there may have been some calls that Rama, her records may have had. But sitting

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here right now I can't tell you that.

Q Would Keith Glaser be one of those people?

A See, now there's another one. And that -- I'm real unclear about conversations I had with Keith Glaser.

In another one of these interviews, as much as I would like to, again, a lot of my information was coming to me from secretaries and receptionists because, you know, I -- it wasn't like I was always in one spot to pick up the phone and have long conversations with people. I mean, I was running a lot, as you can see by my schedule, which you have. So, but just a general sense of, you know, someone else deal with it, just do what they want, I guess it was just a feeling, being hounded.

Q Now, had you made a certain commitment to the Hart people regarding raising X dollars?

A We were always making commitments to the Hart people. I mean you go to the Mayflower hotel and everybody signs in and makes a commitment, then you go to the next commitment, they are always pushing you to make commitments.

Q So prior to the California primary which is June of -- I'm sorry, prior to the convention which is July of

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'84, were you trying to meet a commitment for fundraising?

A I don't know if it was -- yes, probably, I mean that's a general way to look at it. I never felt that that was like the specific goal, it was more like just do it.

Q Did they ever say thank you?

A Don't get me off the subject. "Did they ever say thank you?"

Q Is that a no?

A "Did they ever say thank you?" Who is "they?"

Q The Hart people?

A Who are "the Hart people"?

Q Did Rosen ever thank you?

A I would probably think they would want to deny the fact that I even did it, never even involved in it, I don't know.

Q But at the time that it's going on you are bringing in some bucks, they are strapped for cash, anybody say thank you?

A Well, I think, you know, on a cursory basis they are always kind of saying thank you. You can do more. But I don't --

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Q It is always thank you and you could do more; is that correct?

A Oh, yes, I don't think it was like thank you, you have done your part, we'll see you later. It was never that. That's an interesting question. I ought to think about that one for weeks.

Q Let me ask you if you could turn to what is essentially the third group of contributions, it is headed "late '84, Hart dinner, Bradford." Again we have Loubet, Rama, Court Shannon, Betty Ann Weir, and Harold Weitzberg.

A Why does it say "Hart dinner"? Bradford is a state campaign.

MS. FULTON: Of course I'm going to make my objection to questions related to this group because they relate to state candidates.

MS. REILLY: It was my understanding it was a joint fundraiser for Hart and Bradford.

MS. FULTON: My reading of your document is that the recipient of these checks was Bradford.

MS. REILLY: Let's go off the record a second.

(Discussion off the record.)

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BY MS. REILLY:

Q We will come back to it.

1985, moving right on down. It says "Rama Middel. Two contributions to Americans with Hart." One in January and one in October of '85. Were these contributions reimbursed?

A I don't know.

Q How much was Rama making a year then?

A 1985?

Q Yes.

A 35 to $50,000, somewhere in that range, with perks and benefits.

Q So you have no recollection whether or not she was reimbursed; is that correct?

A No, I mean -- no, I don't have a recollection.

Q Let's move to the next group and it begins with Robert Bonham and it goes until Court Shannon's $2,000 contribution on the next page. And these are 11 contributions apparently made to the Kerry Committee between March 8 and 4/11.

Was there a fundraiser held for the Kerry committee?

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A Yes.

Q Can you tell me a little bit about the fundraiser?

A It was at my house. He just gave a talk.

Q And your employees came?

A Yes.

Q And how many of your employees came?

A I couldn't tell you exact number. Do you have a number there?

Q Actually, no. Let me actually at this point introduce the next exhibit and ask some questions. I'm going to hand to the court reporter Exhibit Number 4.

(Karl Exhibit 4 identified.)

BY MS. REILLY:

Q I'm going to ask you to take a look at this and review this document.

(Witness reviewed document.)

BY MS. REILLY:

Q Have you reviewed this document?

A Yes.

Q Do you recognize it?

A How do you mean, do I recognize it? I've seen

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it before.

Q Where did you see it before?

A The last time I had one of these meetings.

Q When was that? Okay. I'm going to ask you if you would, please, sort of review this document with me. Let's start at the bottom. And the name that appears is Ed Herrera. And the amount next to it is $50.

And moving up we see the name Kelly Ramsey and the amount of $200. And if you flip to the document in front of you, notice that she is listed for that amount.

A Yes.

Q And then we see an S. Bornstein for $100. And the next one, could you read the initials on that?

A E. J.

Q And who would that be?

A E.J. Oshins.

Q How much is she said to have contributed?

A Well, you have on your document $50.

Q And the paper also appears to indicate $50?

A $50.

Q Right. And who is the next person?

A Doug Ayers.

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Q And who is he?

A Just an independent producer who was in a project for us.

Q Did he go to the Kerry fundraiser?

A Probably. I couldn't -- I mean I don't remember. I mean if it says he is there he may have been there.

Q And the next initials are which?

A P. L.

Q And who would that be?

A That would be most likely Pierre Loubet.

Q And the amount he is said to contribute?

A Well, you have an amount, after these letters, of $25.

Q And the next one, what is that?

A L. K.

Q And to the best of your knowledge who would that be?

A Linda Kinwald.

Q And the amount?

A It says 100.

Q And the next one?

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A K. S.

Q And who would that be?

A Probably Karen Stewart.

Q And the amount?

A It says 200.

Q On the Lorimar document?

A Yes.

Q And L. C.?

A Linda Cacia.

Q And the amount?

A $100.

Q R. M.?

A Rama Middel.

Q And the amount?

A 200.

Q J. C.?

A I think that's probably J. L. for John Lutgens.

Q Actually I think you are right, I think it is J. L. And the amount?

A It says $50.

Q And the G. H. at the top, do you know who that refers to?

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A No. It could be Gary Hunt or Gary Hart. Those are the two G. H.s I was involved with at the time. Or good heavens.

Q The Kerry fundraiser that you had, did you reimburse your employees for their contributions to it?

A Yes.

Q The people whose names we've just gone through on the FEC document, were they reimbursed for their contributions?

A I'm sure there is documentation that will show they were or weren't. You know, I'm assuming from this they were.

Q Do you have any basis for believing any of them were not reimbursed?

A Yes, I would think someone like E.J. Oshins or Steve Bornstein wouldn't get reimbursed, that they would make the contribution. And Doug Ayers also in this one.

Q Okay and why is that?

A I don't know. Just a sense I have.

Q That they would be more likely to be politically active?

A Well, you don't have to be politically active to

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contribute money to a campaign, or --

Q Or maybe they had the money?

A Or maybe they had the money.

Q Is there anyone on this list who came to the fundraiser --

MS. FULTON: Which list are you referring to?

THE WITNESS: Aren't we talking about Kerry?

BY MS. REILLY:

Q Is there anyone on Exhibit 3 who went to the fundraiser and was not reimbursed other than the people you have already indicated?

MS. FULTON: To the best of your recollection.

THE WITNESS: To the best of my knowledge I would sense from the $50 that E.J. probably paid that herself.

Q Did you reimburse anyone else, not on Exhibit 3, for contributions they made to the Kerry committee?

A Probably not, just these employees. I mean that's the best of my recollection.

Q Did the reimbursement activity which occurred encompass simply your employees and the people you have mentioned so far?

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A Yes.

Q So essentially it would be employees and people with a business relationship with the corporation; is that correct, and the Weirs?

A Yes, I mean --

Q I'm going to ask you now to look at the contributions under the heading of May in the left column beginning with Janice Benlein and ending at the bottom of that page.

MS. FULTON: We're going to object. This refers to state candidates. The recipient listed by you is a state candidate.

THE WITNESS: Dave Carter?

MS. REILLY: No, Carter was a congressional candidate also. And we're going to go back --

THE WITNESS: That's right, he was.

BY MS. REILLY:

Q And Bradford was also a candidate, that's how we picked up the name from the FEC reports.

MR. BERNSTEIN: Off the record.

(Discussion off the record.)

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BY MS. REILLY:

Q While we were off the record we determined that the Carter --

MS. FULTON: And I withdrew my objection.

BY MS. REILLY:

Q -- the Carter committee was a federal candidate committee. And so of the 10 contributions listed, starting with May and ending with George Unwin, were these people who were reimbursed for their contributions?

A I would assume so, yes.

Q Is there anyone appearing on that list who was not an employee of the corporation or have a business relationship?

A No.

Q Mr. Unwin, what is his association?

A He was a producer.

Q So to the best of your recollection all of these were reimbursed?

A Yes.

Q If we could move to page 4 -- actually I'm going to introduce Exhibit 5, please.

(Karl Exhibit 5 identified.)

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BY MS. REILLY:

Q I'll ask the witness to take a moment and look at that, please.

(Witness reviewed document.)

BY MS. REILLY:

Q Have you looked at this document?

A Yes.

Q Do you recognize it?

A Yes.

Q Can you describe it?

A It is an RSVP, it says at the top, for a party for Katherine Townsend.

Q And the date?

A 9/23/86.

Q And was this a fundraiser that you had at your home?

A Yes.

Q How did you come to have a fundraiser for Kathleen Kennedy Townsend?

A Steven Rivers, I think, suggested I have it.

Q And who is Steven Rivers?

A Steven Rivers was a press agent type who worked

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on campaigns before. I think he worked in Sacramento and he was working with us. For our corporation doing consulting on press, and interfacing new talent and personal appearances and stuff.

And he was -- also had an interest in politics and knew a lot of these people --

Q A lot of these people being candidate people?

A Yes.

Q Did he have an association with Jane Fonda?

A Yes.

Q What was that?

MS. FULTON: Objection. How is that relevant?

MS. REILLY: Mr. River's role is relevant in terms of the contributions that occurred initially --

MS. FULTON: But how is his role to Jane Fonda relevant?

MS. REILLY: There are a number of issues here regarding who and who was not reimbursed for contributions. So for that reason I think it is relevant.

BY MS. REILLY:

Q If you can, please answer the question.

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A What was the question again?

(The reporter read the record as requested.)

MS. FULTON: I repeat my objection.

THE WITNESS: Yes.

BY MS. REILLY:

Q And what was that association?

A I think he was -- I don't know his official title, but he worked on her press for Fonda Films, doing press, from what I understand.

Q And the fundraiser that you held roughly, according to the RSVP list, about 81 people came?

A Yes.

Q And did you expend any funds for that fundraiser?

A I'm sure I did.

Q Did you have catering?

A Yes.

Q And valet parking?

A You always ask the valet question. I don't know. I don't remember.

Q 81 people coming to your house, you probably --

A Probably. Probably. I never checked outside.

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Q The candidate appeared at this one; is that correct?

A Yes.

Q And anyone else?

A 81 other people.

Q Including Ethel Kennedy?

A Yes.

Q Of the people listed here on Exhibit 3, I believe, which is the first document, beginning with Neal Bagman under September. Who is Neal Bagman?

A He's an attorney for Karl/Lorimar.

Q What about Anthony Douglas?

A He was head of Playboy Productions for Karl/Lorimar.

Q And these contributions here, I believe there are 16 of them, were there any that were not reimbursed by you?

A Of these?

Q Yes.

A It is hard for me to say. Again I go to Steve Bornstein and Neal Bagman as probably not -- and E.J. not wanting to be reimbursed, not being reimbursed, and the

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rest probably being reimbursed to the best of my recollection.

Q Was there ever a situation where, you know, sort of throughout all these reimbursed contributions that were going on that an employee stated they didn't want to make a contribution or be reimbursed for a contribution?

A How do you mean?

Q In other words did you hear that Rama approached this person and said will you make this contribution and we will reimburse you and the person to whom the offer was made refused?

A Not that I remember. Not that I recall.

Q And yet you are fairly sure that Bagman and Bornstein and --

A Not fairly sure. I said to the best of my recollection I'm assuming. A jab, I couldn't say exactly yes or no.

Q But everyone else is fairly likely that they were reimbursed?

A Yes.

Q And did anyone else attend that fundraiser who was reimbursed by you?

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A No. I would assume just this list here.

(Witness conferred with counsel.)

BY MS. REILLY:

Q Did you want to clarify your answer?

A No.

Q The next group of contributions you have got Court Shannon on the bottom of page 4 and Rama at the top of page 5; both are dated October 31, 1986 to Tim Wirth.

How did you become to be involved with the Wirth Committee?

A I don't know if it was Rosen or Rivers, but it is probably one of the two, said you ought to do this for him.

Q And so when they said "you ought to do this for him" --

A I don't mean that in terms of that's exactly how they said it. I'm just trying to characterize.

Q Right. Did you understand at that time that they were looking for a contribution from you personally?

A How do you mean?

Q In other words did they think that you would make the contribution to Tim Wirth?

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A Yes, I'm sure they assumed that I'd make a contribution to Tim Wirth.

Q Was it your impression that they understood you would also solicit and reimburse your employees the contributions to Wirth?

A Well, you know, it is hard for me to say with the Wirth or any other campaigns that they did or did not know what was going on or sensed. I'll tell you from the beginning it was a sense I had. And I clearly got that sense from the Hart Campaign. I never got that sense from the Townsend, Kerry, or Wirth campaign.

Q Was that --

A Or Bradford.

Q -- was that because you --

A -- Carter.

Q Any other campaigns?

A No.

Q Was that because you were communicating with those folks at those other campaigns?

A That was because -- well, once you are in that position, it seems like the phone rings all the time, and, you know, that's just -- I had a general sense that's

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what's being done, and so they call me and that's what's got done.

This is what Hart did and he was running for president. You know, and this is the campaign manager for Hart, finance guy, all the secretaries do it at law firms. And then it was like, I didn't sit down and address every single one -- it was like -- I think there was probably even some discussion with Rama just, you know, if you will leave me alone, yes, I'll do it. What do they want, deal with it, Keith Glaser type stuff. I mean I'm running the company at the same time all this was --

Q And this wasn't your first priority?

A No.

Q And there are contributions to Wirth from Court Shannon and Rama. Were they reimbursed?

A I would assume they would be.

Q Our last group of contributions, in Exhibit 5, there are four of them, from Steve Bornstein through Court Shannon, all dated December 3, 1986, all for $750 and all going to the '88 Hart Campaign.

Were any of these contributions not reimbursed?

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A I would assume they were reimbursed.

Q I'm going to return --

A Maybe Gary Hunt may not have been reimbursed.

Q And what's your basis for saying that?

A His general attitude was I want to get in and do what I can do and, you know, you can't reimburse me on that. I just vaguely remember a conversation like that that's why I wanted to mention it.

Q Would that be true for any other contribution Gary Hunt made?

A No, Gary Hunt was becoming more and more prominent within our company within six months.

Q So for example his -- on page 3 we have $1000 contribution to --

A He was most likely reimbursed for that but not this one.

Q That $1,000 contribution to the Carter Committee?

A Yes.

Q The only one I wanted to return to was the Bradford dinner on page 2.

MS. FULTON: For the record I will withdraw my

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previous objection to that topic.

BY MS. REILLY:

Q Were any of these employees not reimbursed for their contributions for the Bradford committee?

A I would assume they were reimbursed.

MS. REILLY: We're just going to take a quick five.

(Recess.)

THE WITNESS: I wanted to clarify relating to that list of amounts and titles you gave me for all the campaigns.

Again I was assuming that I reimbursed all these people. And I wanted to make it clear that as a practical matter I don't remember specifically. Assuming that at some point the people were reimbursed once doesn't necessarily mean they were reimbursed every time. I just wanted to clarify that.

BY MS. REILLY:

Q I see. Can you recall someone who was reimbursed once but not another time, other than Mr. Hunt?

A Not specifically.

Q I would like to run through, if we could, and --

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A Excuse me. E.J. Oshins.

Q Was reimbursed once but --

A Not another time.

Q Thank you.

We've had some discussion regarding fundraisers today, you had a fundraiser for Senator Hart at your house at one point. I believe we decided it was in 1983; is that correct?

A I think we tried to come to that date. I'm sure it -- well, it sounds like '83, yes.

Q And this morning we showed you a check regarding amounts you had paid for the Carol King concert?

A Yes.

Q That was Exhibit 1. Were you involved with that -- scheduling that concert at all, Carol King concert?

A Scheduling the concert, no.

Q Were you involved with the fundraising or the publicity for it?

A No.

Q Did you go to the concert?

A Yes, it was a good concert. What did she sing is your next question.

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Q What did she sing?

A All of her songs.

Q Did you make a commitment to sell any tickets to it?

A Probably.

Q Do you have any specific recollection of selling tickets to anyone?

A Yes, I think. I think I went with a couple associates of mine and I think we bought tickets.

Q And who were they?

A I think -- well, I know one was Tim Paone. I know clearly because I think I sat next to him and we talked the whole time. Who else was there, if you show me a list I'll recall. But --

Q Any of your employees attend that you know?

A They may have attended, maybe not with me. I don't recall.

Q How many people were there, roughly? Thousands?

A How many people does the Dorothy Chandler Pavillion -- well, I think that's where it was. I don't know.

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Q Thousands?

A Oh, yes, it was a major concert.

Q Now, did you participate in a fundraising event called "Voices for Change," with Barbara Streisand?

A Oh, yes.

Q What can you tell us about that?

A Can you be more specific?

Q Well, did you attend the concert?

A Yes.

Q Who did you go with?

A My wife, some friends, other people.

Q Did you make a commitment to sell tickets to it?

A Not to sell tickets. I think it was to buy a table.

Q And how many people would be -- how many people were seated at the table?

A I think 10.

Q So -- and how much was the minimum contribution?

A I think a seat was -- was it 2500 bucks? I mean I think it was somewhere around there. It was definitely

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a major fundraiser.

Q Did you do anything to prepare for the concert?

A I went to a meeting at Barbara's house prior to the concert where it was debated what to do, where the concert was discussed. Barbara wanted to do something because the Chernobyl thing scared her.

So a group of people went to her place on a Saturday to discuss various options of what to do, which ultimately, the concert was the option. In terms of, you know, she had not performed in years, maximum fundraising, sell the rights, et cetera, et cetera. One of the things our company discussed was buying the video rights of the concert.

Q And did you?

A No.

Q Were you involved in any of the publicity that went on about it?

A No.

Q Did you do anything else for the concert?

A Just what I mentioned with the video and what we discussed at that meeting at her house. I mean I can't recall, I may have. I don't remember.

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Q You said you bought a table for 10 and you thought that the seats went for 25 hundred --

A Each. 1250 each? Something like that. It was 25 grand.

Q Right, and did you make a $25,000 contribution to that event?

A I think I bought the table for $25,000.

Q And did you reimburse yourself for that amount with a corporate check?

A I think I did.

Q Are you sure that you did?

A I fairly -- I think you probably have the check, don't you?

Q But what I'm trying to do is probe your recollection.

A Do you have a check?

Q I can't answer your questions, you have to answer mine. I'm not trying to be difficult.

A Neither am I. I'm just trying to get help here.

Q Right. Was it part of the indictment that was issued?

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(Witness conferred with counsel.)

THE WITNESS: I don't specifically remember. I don't want to sit here and speculate.

BY MS. REILLY:

Q You don't remember whether you were reimbursed for the --

A No, you asked the question whether it was part of my indictment or not. And I said no, I --

Q Okay. Do you recall whether or not you were reimbursed with a corporate check for the $25,000 you paid for "Voices for Change"?

A I think I was. To the best of my recollection. I can't specifically recall. That's why I asked you if you have the check. I think I was.

Q Were any of the Hart people that we have mentioned, Rosen, Novelli, Glaser involved at this?

A Not that I recall.

Q What about Steve Rivers?

A He was the one that -- yes, I don't know to what official extent he was, but he went to this meeting at Streisand's house, prior --

Q Did you discuss with anyone the fact that you

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had contributed $25,000 to this event?

A Discussed with who, how do you mean?

Q Anyone who was at the meeting at Streisand's house, for example.

A Well, the meeting at Streisand's house was a formation thing. The concert didn't even come up until after that meeting.

Q What about other people who attended the concert with you, did they wonder where the tickets came from?

A Yes, I think I mentioned I bought the table.

Q But did they know you had purchased the table is the question?

A Oh, I'm sure they did.

Q Anyone else?

A You. Other people I sat across the table and discussed this. I can't recall anybody else. That doesn't mean there weren't any other people. I just can't recall.

Q Was there a Hart fundraiser in 1986 at the Park Restaurant?

In Corona Del Mar?

A For a movie screening?

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Q I don't believe so. There was a movie screening, I believe in March of that year at the Port Theatre?

A Yes, because the Park Restaurant is right next to the Port Theatre, that's why I asked.

Q I see, okay.

A Now the Park also was the catering company that I used to cater from. If I paid the Park Restaurant that may have been for catering also, to clarify.

Q I see, so let me be sure I understand.

A Ethel Kennedy event, Townsend event, the Park Restaurant catered that event, for example. So there may have been a check to the Park Restaurant for catering events.

I can't recall there was an event at the Park Restaurant. As a matter of fact I don't think there was, unless there was something tied to that --

Q Unless it was tied to the event that happened a month later next door which was the screening --

A Yes, I'm just surmising here.

Q Now, the Port Theatre event, did you provide the film that they showed?

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A What was the movie?

Q I believe it was "The Boy Who Could Fly."

MS. FULTON: If you have documents from which you are basing your questions, the witness is entitled to see them to help him refresh his recollection.

MS. REILLY: Actually, all I have right here are just notes and we're just trying to probe what he does recall. We'll do more documents as we go along.

MS. FULTON: I understand, but to the extent you have documents that your questions are based upon, I think he is entitled to see them to refresh his recollection.

BY MS. REILLY:

Q And certainly we understand that this is all subject to your best recollection. But anyway, if I can hand this to the court reporter and ask her to mark it.

(Karl Exhibit 6 identified.)

BY MS. REILLY:

Q Let's see if this refreshes your recollection on this. I ask you to please take a moment and look at it.

(Witness reviewed document.)

BY MS. REILLY:

Q Have you had a chance to examine this document?

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A Yes.

Q Do you recognize it?

A I recognize it now, I mean I don't remember it from then.

Q Can you describe it for us?

A It is a memo to me from E.J. regarding fundraising film-Hart, telling me two films that she is probably subjecting to have for this event.

You will notice in the top right-hand corner, obviously it appears to me from this, I got the memo in my in box, where I get my mail, wrote "priority" on it, and in essence, Rama dealt with it from that point on. Because I notice she put on here -- these are Rama Middel's notes, "Bernie will call back." Which refers to Bernie Schneider who was obviously very involved in all Orange County Hart fundraising events, intimately involved.

And E.J., that would be her job getting films.

Q At this point I'm going to hand to the court reporter a two-page exhibit. Exhibit 7.

(Karl Exhibit 7 identified.)

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BY MS. REILLY:

Q I'm going to ask you to examine this two-page document, please.

A Do you know what was on the other side of this?

Q I think that's the complete document.

A But this is to be returned.

Q Right, that would be a return address card that would go inside this letter.

A With what on the back of it?

Q It is an envelope. It is a photograph of an envelope.

A So he was using Buchalter, Nemer, Fields business reply mail for Gary Hart business?

Q It sure looks like it. I guess my question did you know that he was doing that is in the negative?

A I don't know. Can you do that?

Q Well, --

A I'm just curious. I'm --

MS. FULTON: Could we go off the record a minute?

MS. REILLY: Yes, let's go off the record.

(Discussion off the record.)

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BY MS. REILLY:

Q Have you had a chance to review that document, Exhibit 7?

A Yes.

Q And do you recognize it?

A Now I see it, yes.

Q Can you describe it for me?

A It is a letter from Bernie Schneider. It is obviously a form letter sent to a mailing list he must have had, again we're speculating, to invite people to this film, fundraiser.

Q And you said that Bernie was intimately involved in this one?

A Yes, I mean I'm assuming so, it is his stationery and his letter with a return to his law office.

Q Do you recall any conversations you had with Bernie regarding putting on this fundraiser at the Ford Theater?

A Can I see those documents for a second? You just took them all away and I want to see the Stein/Brief letter for a second. I'm just trying to match dates

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here.

Q Sure, please.

A I'm sorry, the question? Did I discuss this with Bernie?

Q Yes.

A I don't remember any discussions. I'm assuming that I discussed getting a film for him and probably put Bernie in touch with E.J. through Rama on how to deal with that, and Missy worked for E.J., that was her secretary.

So I'm assuming that Missy probably did it for E.J. You know, went and got the film, because you call the studios and they give you whatever film you want.

Now, you are saying it wasn't one of these two films, it was --

Q Well, actually I shouldn't have testified. And this is probably a better statement of the movie that was actually used.

A This doesn't actually say what film.

Q To be absolutely honest, I haven't the faintest idea what film it was.

But did you go to the Hart fundraiser?

A No.

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Q You didn't go?

A Did I go to this event --

Q At the Port Theatre?

A No.

Q And why didn't you?

A I had probably seen the film.

Q Was Gary Hart there?

A "Was Gary Hart there?"

Q At the fundraiser.

MS. FULTON: If you know.

THE WITNESS: Yes.

BY MS. REILLY:

Q He was there? And did you meet with him? This is March of '86 when he came to town.

A At this event?

Q No, while he was in town around --

A Well, I saw him after this event.

Q And where did you see him?

A I had dinner with him right after this event.

Q Where did you have dinner?

A I know exactly where this restaurant is, I'm trying to remember the name. The restaurant Laguna.

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Q Laguna Beach?

A Yes, the restaurant David Stein owned. I want to say Hemingway's. I think they changed the name.

Q How many people were there with you and Gary Hart that night?

A Myself and my wife. David Stein, and another couple, a couple friends of ours who just happened to be in town.

Q So it was a small dinner?

A Yes.

Q Did you discuss the senator's plans for the 1988 presidential bid then?

A No.

Q What did you discuss?

A That's funny, I clearly remember this one because this other couple who I very rarely see, they are farmers from Montana, and I think they spent the whole -- I'm talking about ranch farming and raising purebred cows and acreage, and things of that nature.

So I mean it was very much an off the subject, let's talk about mountains and cattle and farming.

Q Did Lorimar own the film that was used at the

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fundraiser?

A Are you able to tell me exactly what film was shown?

Q We sort of narrowed it down to --

A If it was The Boy Who Could Fly. That was a Lorimar film.

Q And the other two that are listed up there?

A This is Orion and Columbia, it says in this memo.

Q What about the Cranston fundraiser in August of '86, did you attend one of those? This is apparently at the Pacific Club.

A Yes.

Q And what can you tell me about the Cranston fundraiser? Were you involved in the planning?

A Most likely, yes.

Q Why do you say "most likely"?

A I remember the Pacific Club, and a lot of my friends were there, so I think -- I don't know if I was the sponsor or one of the sponsors of the event, but I was.

Q To have a function there you have to have a

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sponsor?

A You have to be a member.

Q Is Bernie Schneider a member there?

A I don't know. I don't think so.

Q Was he involved in fundraising?

A He may have been, I don't recall.

Q How about Dave Rivers?

A Steve Rivers?

Q Steve Rivers.

A He may have been. I mean I don't recall. Do you have some document that would help me remember?

Q No, I sure don't.

Then we have the Townsend event we discussed previously. And that was at your house; right?

A Yes.

Q Was there another fundraiser for her the next day in San Francisco?

MS. FULTON: If you know.

THE WITNESS: I don't know.

BY MS. REILLY:

Q It didn't have anything to do with the --

A No.

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Q Now, the Cranston fundraiser at the Pacific Club, did you pay expenses for that?

A I don't recall. Most likely. I mean I don't want to speculate.

Q Did you attend another fundraiser for Cranston at the Beverly Wilshire in October of '86? And that would be right before his Senate election.

A I don't recall. I mean I know there was another -- I know there was another event. I don't recall.

Q Now in terms of fundraising in D.C. we've discussed the Mayflower one, hotel finance meeting that you went to in 1984, did you attend a fundraiser at Pamela Harriman's house?

A Yes.

Q And when was that?

A I don't remember.

Q Well, did -- you sense it was before Gary had run the first time?

MS. FULTON: You mean prior to the 1984 election?

MS. REILLY: Right.

THE WITNESS: I'm assuming it was for the first

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time he ran, for the '84 election. I'm assuming that. I don't --

BY MS. REILLY:

Q Did you make -- I'm sorry. Did you make a special trip into town for it?

A How do you mean "special trip into town"?

Q Was it the only reason you came to Washington?

MS. FULTON: To the best of your recollection. All you can testify to is what you recall.

THE WITNESS: I don't know if that's the only reason I came to town.

BY MS. REILLY:

Q How frequently did you come to Washington between '83 and '87?

A I couldn't tell you specifically. I mean a number of times.

Q Did you have business here?

A For a period of time, I don't remember when it was, we were involved in a -- the first SALT doctrine testifying stuff with that, I don't know if that was in the same period of time or not. But I don't --

Q Testifying before Congress?

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A Yes, you know, committee. And then we would have trade shows here. We had a major video/software dealer convention, VSDA show. Erol's is a big customer in the video business, and always has been, 200 stores.

Q Mr. Karl, were you involved -- was your corporation involved with a sale/leaseback of furniture in the Americans with Hart campaign?

A Yes.

Q Can you tell me a little bit about that?

A Specifically how do you mean? I think that was one of the first things I was involved in was here is a way to -- you know, and this is where I think I -- in discussions before, I don't know if this was actually Rosen or someone prior to Rosen, and I still was not able to put my finger on who I had these original discussions with, but I know it did get into Rosen was, you buy the computer, you buy the furniture and we'll lease it back to you, fax machines and things of that nature.

Q And the idea was that you would buy them back from the committee and --

A Yes, I bought them from them and they would lease them back.

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Q Why did they want to do that?

MS. FULTON: To the best of your knowledge.

THE WITNESS: To the best of my knowledge, I mean I'm assuming to raise cash.

BY MS. REILLY:

Q Had you ever entered into a transaction like that before this one occurred in '84, sale/leaseback?

A Not that I recall.

Q For the political committee?

A Not that I recall.

Q And you probably would recall, wouldn't you? It is fairly unusual.

A Not necessarily. It has been a tough couple of years and I don't say that loosely. Between getting sick and everything.

Q Let me see if I could sort of refresh your recollection a little bit on this. I'm going to hand this to the court reporter and have her mark it.

(Karl Exhibit 8 identified.)

BY MS. REILLY:

Q I'm going to ask the witness to please take a moment and look at that.

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(Witness reviewed document.)

BY MS. REILLY:

Q Do you recognize it?

A Yes.

Q Could you describe the first page for us?

A It is a memo from Rama to me regarding the transaction or discussions with James Dwinell.

Q And who is James Dwinell?

A He was one of the other -- the name I was looking for, the other finance guy. Involved with Rosen. He was like the national finance guy --

Q So he --

A -- and he had all these titles.

Q But he was a big guy?

A Well, he was in the headquarters in Washington.

Q And it is discussing payment of bills. Is this regarding the leasing of equipment we just mentioned?

A What equipment are you talking about?

Q I'm sorry, furniture.

A It says office furniture on page 3. I'm assuming that's what this was about.

Q And the $10,000 check on the second page from

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Karl Video Corporation, February 16, '84; is that the amount that you paid for the furniture which you purchased from the Americans with Hart committee?

MS. FULTON: Are you asking him if this is the amount he paid or if this is a check that paid the --

MS. REILLY: Actually it is both I suppose. The check paying that amount or --

MS. FULTON: I think there is a lack of foundation for whether this is the check.

MS. REILLY: But I'm asking.

MS. FULTON: I object. There is a lack of foundation for that question.

BY MS. REILLY:

Q I'm going to ask you to answer it anyway, please.

MS. FULTON: I think the objection could be overcome if we asked Mr. Karl if he has any recollection of what this check is.

MS. REILLY: Fine.

BY MS. REILLY:

Q Do you recall this check?

A I'm assuming it is attached to these documents.

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MS. FULTON: Make no assumptions. It was attached right there before your eyes.

BY MS. REILLY:

Q Did you pay $10,000 for the furniture in question?

A Yes.

Q Can you think of any other $10,000 that your corporation would have paid to Americans with Hart in February of '84?

A No.

Q So it is fairly likely that this is the check in question?

A Yes.

Q And the third page if I can explain to you what it is. The candidate committees are required to file with the Federal Election Commission reports of receipts, disbursements and other sorts of activity. And this is a document that is available on the public record of the FEC. In fact, if you look at the corner there is a number there that would reference you to the --

A Very clearly I can see that. I'm being sarcastic. Let the record stand.

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MS. FULTON: Maybe we could write on the exhibit what that number is.

BY MS. REILLY:

Q It is 840, and that would be for 1984.

A Right here?

Q 217591 -- it looks like 1, probably have to look more to get that.

Whose suggestion was it that you buy back the -- buy the furniture from the Hart people and then lease it back to them?

A Dwinell.

Q Are you sure?

A Not 100 percent confident. I mean I can't remember the phone call, or the conversation. But I mean I'm assuming it was Dwinell. It may be Rosen. Remember I was telling you it was one of those two. I don't know who I had the first discussion with.

Q Those are the two likely candidates?

A Yes.

Q And is it your testimony that you didn't come up with this idea by yourself?

A Yes.

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Q The second paragraph here it says -- these are Rama's notes. Mr. Dwinell says we should ignore the bills."

Can you explain what she meant by that?

A I can't. I'm sitting here trying to think about what that meant myself. I don't know what bills she's talking about.

Q Because presumably if you own the furniture they should be paying you money, correct, if they are leasing it?

A Yes. This doesn't make sense to me.

Q Now, her statement at the -- in the rest of that paragraph she says "I asked him if he feels everything is in order. And he says yes, don't worry. Who can tell. This is one of the questions Peter Bagatelos asked me, is this legal and was it done correctly."

Do you recall having any conversations with Rama regarding the lease in question?

A I can't recall.

Q At the bottom it says -- I think it says, "just hold on to."

Is that your handwriting?

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A Yes.

Q Is that what it says?

A Yes.

Q What were you referring to?

A Just hold on to it. I mean probably keep it out. Just hold on to it.

Q And by keep it out, you mean keep it handy?

A I don't know what I mean by that. Just hold on to it. I'm trying to think what bill she is talking about. You know, we were getting a bill for a fax machine, that may have been part of this, that I never could quite figure out.

Q Maybe we can help.

I'm going to hand the court reporter what I believe is Exhibit 9.

(Karl Exhibit 9 identified.)

BY MS. REILLY:

Q I'm going to ask you to take a moment and look it over, please. This is what you were referring to?

A Yes, because I remember there was some bill that had something to do with this.

Q So you recognize the invoice on top?

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A Well, I recognize it. I mean --

Q Now, on the second page it is billed to Americans with Hart campaign Karl Video. Addressed to Mr. Dwinell.

Why was Telautograph billing you for the Hart committee's fax machine?

A I can only speculate.

Q And?

A I'm not going to.

MS. FULTON: Do you have a recollection?

THE WITNESS: I don't have a recollection.

BY MS. REILLY:

Q But you do recall, if I understand you correctly, that you did buy the fax machine for the Hart people; is that correct?

A Yes.

Q But apparently if we're to make any sense of Rama's notes, you weren't paying the bills for it as it came through after you made the initial purchase?

A Well, maybe I paid the Hart campaign and they paid these people. So I should ignore the bill.

Q That would be your explanation?

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A I mean that's all I can surmise by looking at the documents. Because if I wrote the check to the Hart campaign, and the Hart campaign in essence was involved with me with the facts and then they paid. That's -- I mean I'm just speculating.

Q You know, what I ask you to do, is the previous exhibit, I guess it is 8, could you turn to the last page there. Now, we've discussed that you had a sale/leaseback computer -- I'm sorry, sale/leaseback for office furniture with the Hart people and the date that it was reported to us was 2/24/84.

I also see on the first line of that page that David Stein also apparently was involved in a sale/leaseback with computer equipment. Is this the same David Stein we were briefly discussing?

A I can only speculate. What do you think?

Q The David Stein we were discussing before, does he live in Laguna Nigel?

A Well, if you check the address and the stationery it is the same as --

Q So we can assume it is the same. Let me ask you this. Did you discuss with Mr. Stein his plans to buy

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computer equipment from the Hart committee and then lease it back?

A Not that I remember.

Q So same day, busy day for the Hart people, they sell their office furniture and lease it back and then they sell their computer system and they lease it back.

A Or else they just filed the report on the same day.

Q That's also possible I suppose.

Did you ever discuss it with David Stein, the fact that there was a sale/leaseback of the computer?

A When? Do you know when?

Q Ever.

A I don't know if I ever discussed it with him. I can't recall ever sitting down like saying let's talk about your sale/leaseback to your computer. I mean I --

Q Did you ever mention it to him as opposed to discuss it with him?

A I don't think I know he did it. I mean --

Q When did you find out he did?

A A lot of newspaper accounts of it towards the --

Q Yes?

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A -- '88.

Q Anything before then?

A Not that I recall. There may have been. I mean if you have something to help me refresh my memory.

Q Do you remember getting any legal advice about your own sale/leaseback?

A I think Bagatelos was involved at some level. Again I wasn't paying much attention to it. I don't recall the specifics of it.

Q Did you receive the furniture you bought?

A When I was at their office I saw it.

Q So you knew what you were buying?

MS. FULTON: You mean at the time he bought it?

MS. REILLY: Yes.

THE WITNESS: I think it was just general office furniture in the broad sense of the word.

BY MS. REILLY:

Q Was it the furniture in their D.C. office?

A Yes, the one supposedly out there, upstairs, somewhere out there. (Indicating.)

Q Is there an inventory?

A I don't know, there may have been.

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Q What about a sales contract?

A There may have been. Do you have a copy of that?

Q No, actually.

A Do they have a copy of one?

Q And the funds that you used to pay for the leaseback, if it is in fact what's represented on page 2, then it would be from your corporation; is that correct?

A Yes.

MS. REILLY: Off the record.

(Discussion off the record.)

(Karl Exhibit 10 identified.)

BY MS. REILLY:

Q If you could take a moment please and examine that.

(Witness reviewed document.)

BY MS. REILLY:

Q Have you had a chance to look at this document?

A Yes.

Q Do you recognize it?

A Yes.

Q Can you describe it?

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A It is a memo from Rama to me. Obviously she has had discussions with Doug Rosen and this Randy Thompson guy.

Q And who is Randy Thompson?

A I guess he works with 20/20 Film Productions. I don't recall exactly who he is.

Q 20/20 Film Productions is what?

A I'm assuming from the last one of these interviews I had, a post-production facility in New York City. Well, 202, that's here; right? 212 is New York; right?

Q Telephone number?

A Yes.

Q 202 is D.C.

A Why does it say New York? But it says "film New York." And then it has this phone number.

Q And the second page?

A It is questions regarding the equipment lease.

Q And does that refresh your recollection regarding the equipment lease?

A No.

Q Other than it happened and that it --

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A See, I don't know if someone handed this to me or handed this to her. I mean I don't know. That's my writing on the top that says "purchase documents from them."

Q What did you mine by that?

A I don't know, probably that they were going to give us the purchase documents. I'm just speculating.

This outlines getting the list of the equipment and pays for insurance, term of lease, where do they send it when it is over, et cetera, et cetera. By the way, where is my furniture?

BY MS. REILLY:

Q Mr. Karl, where is your furniture?

A I don't know.

Q And the fax machine?

A At my house.

Q Both? Were there two of one?

A There is two. I have one at my house. The other one was at the Lorimar office. So I'm assuming Lorimar has the other one.

Q And you never saw your furniture again?

A No.

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Q Did you get rent payments for it?

A I don't recall.

Q At the time you entered into this transaction, were you expecting to get rent payments for it?

A I'm assuming so. I never -- I kind of was under the impression I would.

Q So you entered into it with the expectation you would receive payments --

A Something.

Q -- or there was new filming to be something coming in?

A Yes.

Q But it was also your impression that what was really going on here was to get the campaign some funding; is that correct?

A Yes.

Q And you said you spoke with Rosen as far as you could recall, Dwinell as the other person who was mentioned, anybody else at the Hart committee?

A About what?

Q About the furniture, fax situation.

A There may have been. I don't recall. There may

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have been. I mentioned I had a talk with Oliver Hinkel. I don't recall the exact discussion with him.

Q But the Hinkel discussion was related to the equipment rental?

A Some calling me with things I could do to help.

Q And this was one of them?

A I'm assuming so. This happened obviously right after that call from -- it was a Hart call in December, a Dwinell call in January, and all this started happening.

Q Okay. Now, the Hart call in December was Mr. --

A Yes.

Q What did he have to say?

A Do I have notes on that call? I may have. Last time I sat down there were some notes, but --

Q You know, I can't really answer your questions. But --

A If I had the notes that I think you may have I can respond more clearly because as I speak right now I can't recall. I mean it was --

Q But you remember the candidate calling in December?

A Yes.

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Q This is December of '83?

A Yes.

Q And he's looking for some kind of campaign assistance?

A I don't recall the conversation right now, as we sit here today. But it was --

Q But you remember picking up the phone and it was Gary Hart?

A Yes.

Q Now, did he call you at work or at home?

A Home.

Q At home? So he had your home phone number too?

A He even called me by my name.

Q Then you said there was another phone call later on in time from another person associated with the campaign?

A To the best of my recollection and then right after that -- some period of time after that -- Oliver Hinkel called, and that's when Dwinell and Rosen were called.

Q And then Dwinell and Rosen called after Hinkel after Hart?

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A Yes.

Q And if I understand you correctly, Hinkel was trying to come up with ways for you to help raise money for the campaign?

A I think he told me he was -- well, I can't recall. But I know I think he said one of these two guys or I think somebody would be calling me with specifics.

Q Is this the beginning of the hounding?

A Yes, it was always when I was in the bathtub with my little boy, too. Rosen would call. I always remember that very clearly. My little boy and I would take a bath and the phone would ring. So if years from now he is stunted because his dad is always getting out of the bathtub, I'll have this to blame.

Like why did my dad always leave me in the middle of the bath?

Q Just so I'm clear --

A It was a big tub. (Indicating.) No, I'm --

Q Hinkel sort of discussed things generally saying Dwinell --

A I'll tell you I don't remember that conversation. If I thought I could look at some notes and

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refresh my mind, I may be able to help you. Right now I can't. I mean after everything, it is hard for me to specifically remember the tone of Hinkel's call. Clearly the tone of Rosen's calls were always money, some way, this is how it is done. No problem. In terms of Hinkel I can't tell you specifically the tone of that one.

Q What about Dwinell, was he always looking for money?

A Originally I think he was the finance guy. And then all of a sudden Rosen got on me. That's what I'm saying, it may have been Dwinell that did the leasing. I'm still real unclear on that.

Q Or it may have been both?

A Yes, one picking up for the other. Again I'm not real clear on that. I have stated that before, as much as I would like to be.

Q Did you ever provide the Hart committee with a computer -- a personal computer?

A I vaguely remember something about a computer.

Q Was it associated with New York West modeling agency?

A Yes, they may have had an extra computer,

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because that was the office next door to us. It may have been. I mean I don't recall physically doing it. But I vaguely remember he had an extra computer or something. I don't -- I mean it was probably like you handle it type thing, and someone else just handled it.

Q And that would be your --

A Abraham.

Q And it would have been his responsibility to take it to the Hart people?

A I'm assuming. Whatever they told him to do with it, if they did tell him in fact to do something with it.

Q So there was essentially sort of extra computer lying around?

A New West had tons of extra computers. The guy was a computer fanatic. I mean he just had lots of computers. I don't know where the origination of the thought to get New West Computer involved came from, but --

Q But it sort of happened. Did they owe you a favor?

A Who, New West?

Q Yes.

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A The guy who owned New York West, he and I were just friends. I don't know if he owed me a favor.

Q Was he interested in Hart at all?

A I don't recall.

Q Do you know if he went to any of the fundraisers?

A I don't think so.

Q Did he go to the California Hart office?

A Again, I remember it kind of happening, I can't remember the details of it.

Q Do you know roughly when it happened?

A It would have to have been over on 16th Street. Because once we moved off 16th Street I don't think I ever saw him again until about the day before he died. So it would have to be in that '84 period of time. Whenever we moved to Cowan Street. At that point, I hadn't seen him.

Q Do you know what happened to the computer at all?

A No.

Q Sort of went away with the furniture?

A That may have been picked up. That computer may have been picked up. I vaguely remember something about

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it. That's what I'm saying, I don't know if it was going or coming. I don't recall.

Q But you have a sense that maybe you sent someone down to pick it up or --

A Yes, for some reason that may be. It was a long time ago.

MS. REILLY: I'm handing to the reporter Exhibit 11.

(Karl Exhibit 11 identified.)

BY MS. REILLY:

Q I ask the witness to please take a look at that.

(Witness reviewed document.)

BY MS. REILLY:

Q Have you had a chance to look at that?

A Yes.

Q And do you recognize it?

A Recognize it? What do you mean by "recognize it"?

Q Have you seen it before?

A Yes, I vaguely remember seeing some of the pages, not all the pages.

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Q Which ones do you remember seeing?

A The top page.

Q And when did you see that?

A I think the last time I sat down at one of these interviews.

Q Any time previous?

A Not that I recall.

Q Is this a document that Karl Home Video prepares regularly, a balance sheet?

A It looks like a recap. I don't know if we prepare it regularly. I mean for productions we prepare breakouts.

Q And do you recognize the handwriting on it?

A No.

Q And the second page, is that your handwriting?

A No.

Q Do you know whose it is?

A No.

Q Then the third and 4th pages are bills to Americans with Hart, Raymond Strothers, and a second bill to Karl Home Video from Raymond Strothers.

I think you testified previously regarding who

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Raymond Strothers is, but --

A No, I didn't.

Q Oh, okay, can you tell us who he is?

A I think he's a political consultant and film maker here in Washington, D.C.

Q And let's turn to the first page, if we could and sort of -- the document is headed "Karl Home Video, services for Hart Campaign, 1984." There is a list of payee, date, payor, explanation and amount. Do you see that?

A Yes.

Q The first entry is 20/20 Film Productions. The date's 1/31/84, the amount is $17,000. Can you explain that entry?

A How do you mean?

Q Like, what was it for.

A Obviously it is to this film production company. It looks like postproduction facilities. Editing commercials and things like that.

Q Did 20/20 Film Productions do that sort of services for the Hart campaign?

A I guess if they said they did. I don't recall

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on a firsthand basis. They represented to us they did.

Q Why were they representing that to you as opposed to the Hart committee?

A Because from what I understand, we were going to be involved in kind of overseeing, producing a lot of these commercials as like a main contractor. And then we would advance moneys and get involved in the productions. Then it was kind of things we had talked about in terms of Stuart's involvement, you know, being involved in the production of commercials and stuff.

Q Who did you discuss that with?

A Probably in general with guys like Rosen.

Q Anyone else?

A Maybe Dwinell. I can't recall specifically.

Q How about Gary himself?

A Not that I recall.

Q But he knew you were on location with him one day filming a commercial; is that right?

A That was in June of '84. I mean you would have to ask him if he remembers. I was on location. He saw me there.

Q And then the $10,000 figure that follows?

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A That's obviously the furniture.

Q How about the next two?

A Strothers, he's the line producer as we discussed earlier.

Q And what sort of stuff did he do for the Hart people?

A He produced their commercials.

Q All of them?

A Not all of them.

Q And you essentially were -- they expended all these funds and then you paid them?

A Yes.

Q What about -- I'm sorry, the last entry I can't -- the next entry I can't read. Number 5?

A "Zimmerman Galanty." He does the same thing that Strothers does. But he's on the West Coast.

Q And so he was also doing --

A Commercials.

Q Were you involved with any of those commercials?

A Like I said, other than a cursory level, they sent them to me to look at, you know, wanting a comment. And I probably could have made myself more involved. With

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the time restraints I didn't.

Q So you saw all the commercials that are represented by these billings?

A Yes, I think I did.

Q And you commented on all of them?

A I don't think I ever got around to commenting on them.

Q You planned to comment on them?

A I would have liked to. Part of my whole thought was, this is production, see what we do.

Q This is because I don't understand what you do, but would you ordinarily pay for these sorts of services and then --

A I paid -- for example, I paid Zimmerman, Fineman, and Galanty $300,000 to produce exercise tapes for me. They physically went out and did it. Even though we were senior producers per se, he physically would go and role his sleeves up and turn the lights on and do it.

Q Same thing with Strothers?

A Same thing as Strothers --

Q Have you used them before?

A Not for anything -- no, I never used Strothers

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before.

Q So he was new?

A He was new.

Q And the reason why he was new is because he was doing political stuff?

A He was theirs.

Q So he was essentially the Hart committee's vendor?

A Yes.

Q You had no prior relationship with him?

A No.

Q How did you -- sort of mechanically, how did the Strothers people come to expect payment from you?

A I think this arose in the Dwinell thing, well, you know, Karl has a production company, he'll do it for us, and then, you know, kind of never got to the will we pay him back or whatever, it was like just do this, Stuart. Okay?

Q Well, which sort of brings me to my question which is at the time that you gave these folks this money, did you expect to be repaid by the Hart committee?

A Did I expect? I sensed I would. Then as the --

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you know, then you begin to like, with anybody you deal with, the campaign starts getting less and less viable, you begin to question. But we never sat down and addressed it. Things moved real fast in those days.

Q Did you have any discussion with Strothers regarding the fact that Karl Home Video was going to pay the bills?

A I don't recall.

Q In your conversations with Dwinell and Rosen, did you ever specifically discuss payments to Strothers?

A I think they would have suggested the payments to Strothers.

Q And they didn't have occasion to point out that there were individual contribution limitations that you were subject to regarding this?

A No.

Q Didn't happen to point out that you --

A No.

Q -- your business was a corporation and that's what's precluded from advancing money?

A When Raymond Strothers advances money to a vendor to produce a commercial, is he in violation of the

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campaign laws?

Q (No verbal response.)

A Really? So when Roger hires a writer for $5000 --

Q Mr. Karl, I can't really --

A I'm trying to clarify.

Q We'll be happy to answer off the record.

MS. FULTON: Well, I think -- are we on or off the record?

MS. REILLY: Let's go off the record.

(Discussion off the record.)

BY MS. REILLY:

Q We were off the record and we discussed the practices of the media business regarding advances. My question to Mr. Karl is, at the time that you began to make these payments on behalf of the Hart Campaign, did you have an agreement with them that you would make these payments and that you would be reimbursed?

A That was an assumption. Not necessarily we had an agreement.

Q Did you have an agreement with them that you were providing services and that you would make these

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payments in the course of providing the services?

MS. FULTON: Clarification. When you ask for agreement, you are not necessarily talking about a written agreement, you are talking about --

MS. REILLY: Oral.

MS. FULTON: -- any kind of understanding?

MS. REILLY: Right. Understanding is perhaps a better word.

THE WITNESS: Put in the context I was just trying to be helpful because it was the kind of business we were in and they are saying just do this. And I guess I never put myself in a position of clearly saying let's lock this down or what does this mean. I didn't do what I probably should have done in retrospect. But it was always like help us out, do this, you are in that business, you know maybe I was being sold and started to believe the sales pitch.

BY MS. REILLY:

Q And the sales pitch was that?

A Again not understanding how we clarified when we went off the record if it is or isn't a contribution, it wasn't, and maybe I'll go in this business.

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Q Let me ask you about the payment to Harmon Press. Do you recall that?

A Harmon Press?

Q Yes.

A No, I don't recall.

Q Let me ask you to turn pack to Exhibit 10 and ask you to read the second notation there.

A Okay. It says "ask for budget that we could attach to the bill for $17,000."

Q What is "the bill" that you are referring to?

A Well, when you bill somebody for something, you attach the budget. So in other words if -- so I'm assuming that Randy Thompson is asking us for a check that he would give us a budget and we would attach the budget when we send our bill to the Hart Campaign, there is his back up document to it. I'm assuming that's what that means.

Q So it is a search for back up documentation?

A Yes.

Q Now, are you talking about the first payment --

A Well, you said refer to this. I'm just tying 20/20 to 20/20, $17,000 --

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Q Exactly, yes, and that's what we're trying to do.

THE REPORTER: Excuse me. The two of you were talking at the same time.

THE WITNESS: Exhibit 10, I'm referring to number 2. On the first line of Exhibit 11, the 20/20.

BY MS. REILLY:

Q Can you tell me why "bill" is in quotes like that? Is there any significance? That is on Exhibit 10.

A I didn't write it, so I don't know why she did that.

Q Was there a real bill for 17,000?

A Was there a real bill?

Q In other words she's got bill in quotes. Saying is it representing services that these people actually provided?

A I'm assuming what will happen is they will generate a bill from that. I don't recall seeing the bill.

Q And you don't seem to feel there is any significance regarding the fact that bill was in quotes?

A What do you think? I mean I don't know.

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Q My thought would be it is in quotes for a reason. What's the deal?

A I don't know. I --

Q But it is your testimony, if I understand you, that 20/20 Film Productions did produce commercials and that you saw them?

A No. I said Raymond Strothers produced commercials and saw them. I said 20/20 was a -- from my understanding was a post-production facility, and I'm not even clear on that, because I've never been there. I'm assuming that that's what they did.

Q Post-production facility means doing what?

A A place where you edit the commercials. The producers go in and you actually sit down and mechanically edit things or transfer tapes or put voice over on things, I mean that's a post-production facility. They may be producers. I don't think so. But I don't know. I'm speculating.

Do you know who they are?

Q I guess we're going to go back. Procedurally, how would you come -- or would Karl Home Video come to pay for these things? I mean I know there was an arrangement

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apparently with the Hart people that you would do so. Would the bills come in and you would see them and pay them? Or --

A These people would call, because they always needed the money tomorrow. I mean --

Q Now, "these people" are who, 20/20?

A Randy Thompson, Doug Rosen, various people.

Q What about Strothers, would he call too?

A I don't recall if he would or not.

Q So you wouldn't even see a bill, you would just send out the money?

A I'm not saying we didn't see a bill. I'm just saying it wouldn't be like in the normal, you know, 30-day cycle. It was always sooner than later. Because most production people like to see the media people pay --

Q Right away?

A Yes.

MS. FULTON: Could we take a break? Unless we're going to end soon.

MS. REILLY: Do you want to take five? And we'll come back until about 6:00.

(Discussion off the record.)

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(Recess.)

BY MS. REILLY:

Q Can we return to Exhibit 11, please, regarding 20/20 film productions, did you have any conversations with them regarding the services they were providing for the Hart Campaign?

A I think Raymond did most of that discussion, I didn't, not that I can recall.

Q Did any of the Hart people communicate through you regarding the 20/20 Film Production services, talk to anybody about it?

A Any of the Hart people?

Q Did they communicate to you what they wanted 20/20 to do?

A I vaguely remember some notes or discussions about this, but I can't recall. They may have described what was going on, chose a production or whoever it was for what it was and a reason.

Q Sort of informational?

A I may have made notes or something.

Q But was it sort of informational type stuff?

A I don't know. How do you define

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"informational"? Is this informational? You know what I'm saying? At a cursory level or --

Q And did you communicate with Strothers during this period?

A I think you asked me that. I don't recall if I communicated with him.

Q And Zimmerman?

A Well, Sid Galanty and I communicated on a regular basis.

Q And was that about the Hart stuff that he was doing?

A Yes.

Q So for some of these people it sounds like you paid the bills and for other people you had communications; is that correct?

A Yes.

Q This period of time is roughly January of '84 through May '84, sort of heading up into the California primary, sort of time frame reference.

At what point did the Hart people call you and ask you for a wire transfer of a large amount to a New York bank?

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A Call me personally?

Q Or through Rama.

A They may have. I can't recall it specifically.

Q Do you recall making -- do you recall authorizing wire transfers during this period?

A I don't remember.

Q Do you regularly use -- or then, I'm sorry, this is the '84 period. Did you regularly use wire transfers?

A I don't know. I don't know how Dennis -- whether he -- he may have. I don't recall. Why the distinction with wire transfer is that it sounds like a quick way to pay versus writing a check.

Q Well, you also with a check have a receipt.

A It says wire transfers, and I --

Q Do you know where the Hart committee had their bank?

A You mean there is no record of wire transfers?

Q No, I'm asking you if you recall.

A What bank? I think -- I knew they had the Riggs Bank, wasn't that one near Washington, D.C.? I think that was one bank. Because I remember where at one of the meetings how he had to walk down to the Riggs Bank, we

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needed the pledges, so I could get more money and blah, blah, blah.

Q Let me ask you if you could turn to the rest of this exhibit. The Strothers bill, the invoice dated March 28th?

A Yes, I see it.

Q It looks like we have a bill from January 10th through March 29th. Totaling $93,000. And then we have a deduction of $18,000 it says from Karl Video. That I presume would be you.

Can you tell me the sort of -- can you tell me specifically what each of these production billing statements refer to?

A No, I couldn't.

Q Did you know at one time?

A No. I mean I may have. Let me rephrase that. I don't recall it now.

Q What about the notations on the side. Is that your handwriting?

A No, I don't believe so.

Q Do you know whose it would be?

A Where did you get the document?

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Q Actually from you.

A Really?

Q Yes.

A This was one of my documents?

Q Yes, it was one of yours.

A No, was it given by me or was it given by some mysterious people over there giving the documents? I mean I'm just curious.

Q Your counsel.

THE WITNESS: Was this from us?

MS. FULTON: Yes.

THE WITNESS: That doesn't look like my writing.

BY MS. REILLY:

Q Why did you pay some of this but not all of this? In other words, you made this $18,000 advancement and yet these people apparently were billing Americans with Hart for other stuff. Can you explain that?

A No. You are assuming that I didn't pay all these; right?

Q Yes, I am actually. Let me ask you the better question, did you?

9304355 4365

A I don't recall.

MS. FULTON: I would like to state for the record, if I can, I will not swear to the fact that these documents are from us since the number here appears to have one fewer digits than our numbers.

MS. REILLY: You are right. But I think it was from yours, that's my understanding. I don't know.

MS. FULTON: I'm not saying it is not. I'm just saying there is a discrepancy here, I can't swear it came from us.

BY MS. REILLY:

Q Well, have you ever seen that before? The document.

A This is the one I mentioned earlier I don't recall seeing before.

Q What about the next one, have you seen that before?

A This was 1984. It is now 1990. I may have. I don't recall.

Q And you notice, too, that Strothers is billing you and yet he is "cc billing Dwinell." Why do you think that is?

9304353366

A I don't know. Let Dwinell know he's billing us.

Q Can you tell us what any of these expenses on the last page of the exhibit would be for?

A All I can assume for is they are for the various things they say, color lab, recording place, Roger Jacobs; these are obviously vendors, or contract laborers or a recording place.

Q The only thing I don't really understand is, I guess, why it includes 20/20 Film Production on the second page when you already have an invoice with them. Can you explain that?

A Well, what you are saying is you don't understand why this last one has balance due from 20/20?

Q Right.

A Like 20/20 is paying Karl Video?

Q No. No, actually what I'm thinking of is -- this is the Strothers bill we are on, the last page.

A Okay.

Q And the first item is 20/20 Film Production.

A Yes, that's what they paid out.

Q To them?

9304353667

A To 20/20. They are still doing business with them. That's the only thing I can surmise.

Q So Strothers paid 20/20 for services and you paid 20/20 for services, is that the case?

A It appears that way. But the thing I can't understand is way is 20/20 paying money back? And the last one says "balance due from 20/20 Productions."

Q That's an interesting question, why do you think that is?

A Maybe they went over budget and had to reimburse some money. I don't know. It could be the --

Q Is that the ordinary reason why you would find a balance due?

A Yes, usually, technically.

Q Any nontechnical reasons?

A No.

MS. REILLY: I'm going to hand the court reporter Exhibit 12, please.

(Karl Exhibit 12 identified.)

BY MS. REILLY:

Q I'm going to ask you to examine it.

(Witness reviewed document.)

9304353 3688

BY MS. REILLY:

Q Have you had a chance to review this document?

A Yes.

Q Do you recognize it?

A Yes.

Q Can you describe it?

A It is a letter from Peter Bagatelos to Mr. Jack Quinn.

Q What are the contents of that letter?

A It says "this will confirm" -- do you want me to read the letter?

Q No, just sort of summarize it if you could.

A It is discussing reimbursement for some advanced payments that were made on behalf of the campaign.

Q Did you make payments of $5,485 for airplane tickets or volunteers to go to Iowa to work for the Hart Campaign?

A If this letter says I did, I must have.

Q Do you recall why you did?

A I think I got one of those calls. We've got to fly a bunch of people to Iowa, can we use your -- to go buy some tickets.

9304353369

I said okay, call these people and they put it on the credit card I think and those people went.

Q Only one way tickets; right?

A I don't know. Were they? I just want to know did I get the advantage miles for this? Sorry.

Q Do you recall who you spoke with at the Hart Campaign regarding the airline tickets?

A I've been asked that question before and it is the one I've tried and tried to remember. I can't -- maybe I said I did, I can't remember specifically remember who told me to do it.

Q Do you have a list of suspects?

A We went through that list of people I thought went.

Q So we're talking Rosen --

A This was somebody from San Francisco. This was somebody else who called. And that's why I --

Q Oh, it was someone different from the Hart Campaign?

A Someone that I think -- I mean obviously -- I don't recall. I mean it was somebody from San Francisco who was arranging this.

9304353370

Q Betsy Kinney, does that ring a bell?

A Yes, but she wasn't involved with this one.

Q Not that one? Was it a man or a woman?

A I think it was a man.

Q Did they reimburse you for this amount?

A I don't know, I don't recall.

Q How did you come to get a copy of the letter?

A Probably my in box. I didn't mean to be flippant, I mean I got it, there it is.

MS. REILLY: What do you say we call it a day. Off the record.

(Discussion off the record.)

(Whereupon, at 5:20 p.m., the deposition was adjourned, to reconvene at 9:30 a.m., November 8, 1990.)

GEORGE STUART KARL

9304353371

CERTIFICATE OF NOTARY PUBLIC & REPORTER

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

9304353372

Marlene Knowles

Notary Public in and for the
District of Columbia

My Commission Expires FEBRUARY 29, 1992

April 13, 1984

Stuart Karl
899 W. 16th Street
Newport Beach, CA 92663

Dear Stuart,

As per my conversation with Rama, I have enclosed your check for $200 made payable to AMERICANS WITH HART. Unfortunately, you have maxed-out. If there's any way you can replace this with someone else's check/contribution, we'd appreciate it.

I have also enclosed a copy of the memo we handed out at the last Finance Committee meeting regarding the May 30th event at the Biltmore. As I told Rama, it will be from 8:00 PM to 10:00 PM, $250 per person or $2500 per table, for desserts and wine, plus some great entertainment. Gary will be there and we hope to make it the biggest fundraiser the campaign has ever had.

Basically, we need Finance Committee members to make a commitment to be either an EVENT CHAIR (sell 10 tables or more), EVENT SPONSOR (at least 5 tables) or and EVENT COMMITTEE member (at least 1 table).

I'd appreciate your calling next week to let us know what sort of commitment you can make so that we can include your name on the invitation.

Thank you for your attention to this matter.

Best regards,

CHARLEY DOBBS

enclosures

9304353437373

Fundraising and Events Consultants

404 North Roxbury Drive, Suite 600 • Beverly Hills, California 90210 • (213) 276-8054

000780

STUART KARL
899 W. 16TH STREET [redacted]
NEWPORT BEACH, CALIFORNIA 92663

№ 1261

18-21/185
1220

March 22, 1984

PAY
TO THE
ORDER OF AMERICANS WITH HART $ 200.00

TWO HUNDRED AND ---------- 00/100 DOLLARS

First Interstate Bank
First Interstate Bank of California
Corona Del Mar Office
3141 East Coast Highway
Corona Del Mar, CA 92625

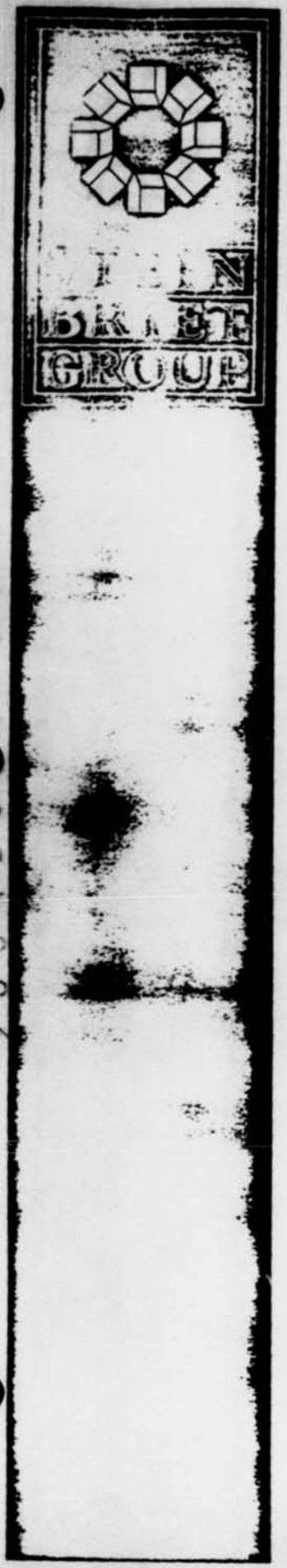
FOR Carol King Concert 000783

Stuart Karl Lama Whi

[redacted]

930435 4 7 4

9304350437 5



March 12, 1984

Messrs. Oliver Hinkel
and Douglas Rosen
Americans With Hart
507 Eighth Street, S.E.
Washington, D.C. 20003

Dear Pudge and Doug,

As you are well aware, Orange County has played a critical role in the Gary Hart Campaign. Stuart Karl, Bernie Schneider and I have been working more than a year to raise funds and build a support network in our county, which has the second-largest Democratic voter registration of any county in the state of California.

Now that the Hart Campaign has moved into high gear the level of activity in California and Orange County in particular has increased dramatically. In response to this changing situation and to eliminate confusion, I believe it is essential that we formalize our campaign organization in Orange County immediately.

Therefore, on behalf of Stuart Karl and Bernie Schneider, I request your approval of the following officers for the Orange County Hart Campaign:

Chairman:	David Stein
Vice Chairman:	Bernie Schneider
Finance Chairman:	Stuart Karl

We have discussed this matter with John Emerson and received his approval, and will coordinate with John to finalize the rest of our campaign organization.

Please accept my aploogies for being unable to attend the National Finance Committee Meeting today. I have asked Stuart Karl to deliver this letter to you personally in order to obtain your authorization.

000775

29982 Ivy Glenn, Suite One Hundred • Laguna Niguel, CA 92677 • (714) 859-6995

Thanks for your time and consideration.

Yours truly,

David F. Stein

cc: John Emerson

Approved: _____
Oliver Hinkel

Approved: _____
Douglas Rosen

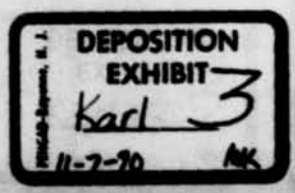
9304350437 6

000776

Contributions Associated with Stuart Karl

Cycle	Party	Amount	Date	Recipient
Early 84	Elizabeth Baughman	500 200	2/6/84 3/6/84	AWH AWH
	Dennis Blackburn	1000	2/6/84	AWH
	Patricia Bonham	1000	4/25/84	AWH
	Catherine Bramnick	250	2/3/84	AWH
	Linda J. Cacia	250	2/6/84	AWH
	Edward Hanlon	250	2/6/84	AWH
	Abraham Kantzabedian	1000	2/6/84	AWH
	Janis Klinger	250	2/6/84	AWH
	Pierre E. Loubet	500	2/6/84	AWH
	Rama Middel	250	2/6/84	AWH
	E.J. Oshins	1000	2/6/84	AWH
	Court Shannon	500	2/6/84	AWH
	Betty Ann Weir	1000	2/6/84	AWH
	Harold Weitzberg	1000	2/6/84	AWH
Mid 84 (Prior to Convention)	Pierre E. Loubet	400	6/6/84	AWH
	George Unwin	1000	6/1/84	AWH

9304355 4377



	Alison Weir	500	6/1/84	AWH
	Rama Middel	200	10/13/84	AWH
Late 84 (Hart Din., Bradford)	Pierre E. Loubet	250	11/26/84	Bradford
	Rama Middel	250	11/7/84	Bradford
	Court Shannon	1000	11/7/84	Bradford
	Betty Ann Weir	1000	11/7/84	Bradford
	Harold Weitzberg	500	11/26/84	Bradford
1985	Rama	50	1/1/85	AWH
	Middel	40	10/1/85	AWH
1986 (March)	Robert W. Bonham	100	3/18/86	Kerry
	Steven J. Bornstein	100	3/18/86	Kerry
	Linda J. Cacia	100	3/19/86	Kerry
	Edward Herrera	50	3/19/84	Kerry
	Linda Kinwald	100	3/12/86	Kerry
	John J. Lutgens	1000	3/20/86	Kerry

9304350 437 8

	Rama Middel	200	3/19/86	Kerry
	E. J. Oshins	50	3/18/86	Kerry
	Kelley Ramsey	200	3/18/86	Kerry
	Karen Stewart	200	3/12/86	Kerry
(April)	Court Shannon	2000	4/11/86	Kerry
(May)	Janice Benlein	500	5/28/86	Carter
	Catherine Bramnick	1000	5/27/86	Carter
	Linda J. Cacia	500	5/28/86	Carter
	Edward Herrera	100	n/a	Carter
	Gary Hunt	1000	5/29/86	Carter
	John J. Lutgens	2000	5/28/86	Carter
	Rama Middel	500	5/28/86	Carter
	Kelley Ramsey	1000	5/28/86	Carter
	Court Shannon	1000	5/29/86	Carter
	George Unwin	1000	5/28/86	Carter

9304379

(Sept.)	Neal Baseman	100	9/24/86	Townsned
	Robert W. Bonham	50	9/23/86	Townsend
	Steven J. Bornstein	250	9/23/86	Townsend
	Catherine Bramnick	20	9/23/86	Townsend
	Linda J. Cacia	40	9/23/86	Townsend
	Anthony J. Douglas	20	n/a	Townsned
	Gary Hunt	1000	9/23/86	Townsend
	Linda Kinwald	900	9/22/86	Townsend
	Robynne Phillipsen	40	9/23/86	Townsend
	Kelley Ramsey	50	9/23/86	Townsend
	George Unwin	1000	9/23/86	Townsend
(Oct.)	Anthony J. Douglas	430 50	10/6/86 "	Townsend "
	Jeff Jenest	250	10/6/86	Townsend
	John J. Lutgens	100	10/6/86	Townsend
	E. J. Oshins	100	10/6/86	Townsend
	Court Shannon	1000	10/6/86	Townsend
	Court Shannon	2000	10/31/86	Wirth

9304435 43380

	Rama Middel	1000	10/31/86	Wirth
(Dec.)	Steven J. Bornstein	750	12/3/86	88 Hart
	Gary Hunt	750	12/3/86	88 Hart
	E. J. Oshins	750	12/3/86	88 Hart
	Court Shannon	750	12/3/86	88 Hart

9304335 4381

KARL·LORIMAR
HOME VIDEO™

From The Desk Of
Rama Middel

Reimb.

$ 50.

$ 200.—
100.—
200.—
100.—
25.—

Glt
RM
LC
JKS
LK
PL
Doug
E.S.
S. Bornstein
Kelly Ramsey

Ayres 50.
50.
100.
200.—

Steve Ross

Ed Herrera $ 50.—

000408

17942 Cowan, Irvine, CA (714) 474-0355

DEPOSITION EXHIBIT 4
Karl
11-7-90
MK

RSVP FOR PARTY ON 9/23/86

* MAKE CHECKS TO:

Citizens for Townsend

5	Guest Speaker and Party
2	Tom Unvert + Cathy Walker
1	Linda Gunderson
2	Kacy Sackett and Jane Guerin
1	Ralph Mazurek
NO	Tony Russell
NO	Ken Kragen
2	Kelley Ramsey
1	Barbara Heffernan
2	Rob Bonham
1	Steve Bornstein
2	Bo Powell
2	C. Townsend
2	Bernie Woolner
2	Mr. and Mrs. Champlin
1	Neal Baseman ?
2	George Unwin
2	Bob Roark and Mrs. Wafega Lacey
1	Roger Gass
2	Gloria Zigner and Pat Pattison
1	Kristen Halverson
1	Betty Weir
1	Tony Douglass
2	Chris Wharf

930435●43383

DEPOSITION EXHIBIT Karl 5 11-7-90 MK

2	Linda Kinwald and Bob O'Neil
1	Robynne Phillipsen
2	John Virtue
2	Brennan Cassidy
1	Mike Stockstill
1	E.J. Oshins
2	George and Barbara Karl
1	Darleen Dotts
NO	Gary and Tony Thompson
2	Debbie Ragsdale and Greg Byers
1	Derek Hall
1	Rich Parker
NO	Mike Wray
1	Kris DeLorme
1	Gary Burrell
NO	Mike Wray
1	Derek Westervelt
1	Bill Harrison
1	Steve Rivers
NO	April Lantz
1	Kathy Cassidy
2	Dana Baljeau and Cindi Gleason
1	Tim Brown
2	John Whitehurst (in place of Mike Wray)
1	James Harrison
NO	Martha Newkirk
2	Dr. and Mrs. Unvert
NO	Bob Haskle

930435 043884

000538

2

Grand Total 67

1 Jane Kawalek

1 Rich Mulherron

1 Court Shannon

1 Linda Cacia

1 Jan Benlein

1 David Stein

1 Jeff Jenest

NO Neil Murphy

GRAND TOTAL 74

2 Gary Harrison

2 John Lutgens + Jo

2 Cathy Bramnick + Denise?

1 Mr. John Walter

81

9304335 4385

STUART & DEBORAH KARL'S POLITICAL GUEST LIST 4/4/86

AIRES, DOUG & GUEST 889 W. 16th St.
1025 W. 30TH ST. Newport Beach; CA.
LOS ANGELES, CA. 90007 92663

BALJEAU, MARCO & DANA
220 NICE LANE #303
NEWPORT, BEACH, CA. 92663

BROWN, MR. & MRS. TIMOTHY
2151 MICHELSOM DR. SUITE 222 13 Red Rock
IRVINE, CA. 92715 Irvine; CA 92714

CHAMPLIN, MR. & MRS. ALLEN
1060 N COAST HWY.
LAGUNA BEACH, CA. 92651

FRIEDENRICH, DOREE & GUEST
2006 YACHT VIGILANT
NEWPORT BEACH, CA. 92660

FRIEDENRICH, DENNY & GUEST 2684 San Joaquin Hills Dr.
FRIEDENRICH & ASSOC. Corona Del mar; CA
3 UPPER NEWPORT PLAZA 92625
NEWPORT BEACH, CA. 92660

GALANTY, MR. & MRS. MICHAEL Sid
340 5TH STREET 1272 Lachman Lane
SANTA MONICA, CA. 90401 Pac. P.C Palisades; CA 90272

GENOVESE, MR. & MRS. MICHAEL
1470 JAMBOREE RD. 22212 Rico Road
NEWPORT BEACH, CA. 92660 S. Laguna; CA 92677

HARRISON, JAMES & LAURA 31863 Seaview lane
C/O GRUBB & ELLIS S. Laguna; CA 92677
4000 MAC ARTHUR #1500
NEWPORT BEACH, CA. 92660

HARRISON, GARY & DAYNA
836 MOLINO
LONG BEACH, CA. 90804

HEFFERNAN, MR. & MRS. JOHN 1937 Port Claridge
610 NEWPORT CENTER DR. SUITE 300 Newport Beach; CA
NEWPORT BEACH, CA. 92660-6430 92660

LITTLE, BERNIE & HEATHER Preffs. off only
1300 DOVE ST. #200
NEWPORT BEACH, CA. 92660

LYON, CURT & GUEST 420 de sola Terrace
LYON RECORDING STUDIO Corona Del mar; CA 92625
2212 NEWPORT BLVD.
NEWPORT BEACH, CA. 92660

MCKNIGHT MR. & MRS. BOB
938 EMERALD BAY
~~NEWPORT BEACH, CA. 92660~~ Laguna Bch. 92651

O'BRIEN, TERRYN & GUEST
[redacted] E. CLIFF [redacted]
NEWPORT BEACH, CA. 92663
1411

POWELL, BO & GUEST 2098 Temple Hill Dr.
C/O ARCHITECT INTERPLAN Laguna Beach CA 92651
2062 BUSINESS CENTER DR., IRVINE, CA.

PAONE, MR. & MRS. 6150 W. Villa Dr.
C/O 1470 JAMBOREE RD SEC. FL. Orange; CA 92669
NEWPORT BEACH, CA. 92660

RAMSEY, KELLY MR. & MRS.
C/O REWIND 13802 Tustin E. Dr. #88
200 E. SANDPOINTE #700 Tustin; CA
SANTA ANA, CA. 92707 92680

RAY, MICHAEL & GUEST 259 Lower Cliff Dr.
2699 WHITE RD. #150 Laguna Beach; CA #611
IRVINE, CA. 92714

RIVERS, STEVE & GUEST 1801 11th St. "D"
914 MONTANA AVE. Santa Monica; CA 90404
SANTA MONICA, CA. 90403

ROSEN, DOUG & GUEST 1925 Old Ranch Rd.
237 ROWLAND CANAL Los Angeles; CA 90049
VENICE, CA. 90291 213-459-9883

RUSSELL, TONY & GUEST Preffs. off only
4631 TELLER AVE #140
NEWPORT BEACH, CA. 92660

SCHNEIDER, BERNIE & GUEST- 668 Buena Vista way
610 NEWPORT CENTER DR. #1040 Laguna Beach, CA.
NEWPORT BEACH, CA. 92660 92651

STEIN, DAVID & GUEST - 9 La Gunita
29982 IVY GLEN DR. Laguna Beach; CA 92651
LAGUNA NIGUEL, CA. 92677

TOWNSEND, CHRIS & GUREST 29642 Coral Cove
C/O 29982 IVY GLEN DR. Laguna Niguel; CA 92677
LAGUNA NIGUEL , CA. 92677

WOOLNER, BERNIE & GUEST 5921 Warwick Cir
C/O 200 E. SANDPOINTE #700
SANTA ANA, CA. 92707 LA Palma; CA 90623

ZUBURG, MR. & MRS.
1421 S. ROSS ST.
SANTA ANA, CA. 92707

TOM HAYDEN & JANE FONDA
316 ALTA
SANTA MONICA, CA. 90402

000540

– write checks:
Citizens For Townsend
– mail to SK

RSVP'S FOR PARTY ON 9/23/86

5 Guest speaker + party
2 Tom Unvert
1 Linda Gunderson
2 [redacted] Kacy Sackett + Jose Guerra
1 Ralph Mazurek
0 – NO Tony Russell
0 – NO Ken Kragen
2 Kelley Ramsey
1 Barbra Heffernan
2 Rob Bonham
1 Steve Bornstein
2 Bo Powell
2 C. Townsend
2 Bernie Woolner
2 Mr. & Mrs. ~~Chaplin~~ Champlin
1 Neal Baseman ?
2 George Unwin
2 Bob Roark & mrs. wafega Lacey
1 Roger Gass
2 Gloria Zigner & Pat Pattison
1 Kristen Halverson
1 Betty weir
1 Tony Douglass
2 Chris wharf
~~Linda~~ Kimwald
1 Robynne Phillipsen
2 John Virtue
2 Brennan Cassidy

there

7

6

RSVP 9/22/86

1 mike stockstill
1 E.J. OSHINS
2 George + BARBARA KARL
1 DARLEEN DOTTS
NO GARY + TONY THOMPSON
2 DEBBIE RAGSDALE + GREG BYRDS
1 DEREK HALL
1 RICH PARKER
NO MIKE RAY
1 CHRIS DELORN
1 GARY BURRELL
NO MIKE WRAY
1 DEREK WESTERVELT
1 BILL HARRISON
1 STEVE RIVERS
NO APRIL LANTZ
1 KATHY CASSIDY
2 Dana Baljeu + Cindi Gleason
1 TIM BROWN
2 JOHN WHITEHURST
1 James Harrison
2 Linda KINWALD + BOB O'NEIL
NO MARTHA NEWKIRK
2 Dr + Mrs UMBERT.
NO BOB HASKIE
2 - SK + DHK
2 - Scott Karl + Barb Barr

421
1-JANE KAWALEK
1-RICH MULLERTON
3- Brad Ackerman
Chip N.
Edie N.

202
2431

Patty Shaffer - NO
Heather Hines - NO
(1) - Scott Buckhammer - yes
(1) - Elizabeth B. - yes
(1) - mike Balmages - yes
714-553-9266.

9304435888

000542 7

KARL·LORIMAR
HOME VIDEO

2/11 Bonnie will call back.

PRIORITY!

MEMO

To: Stuart

From: E.J.

Re: Fund Raising Film - Hart

Dept:

Date: 2/7/86

CC:

- told Missey to tell E.J. Violets Are Blue

9304350 43889

JUST BETWEEN FRIENDS — Orion (3/21 release)

stars: Mary Tyler Moore
Sam Waterston
Ted Danson
Christina Lahti

Suddenly widowed housewife Mary Tyler Moore learns that her husband had been having an affair with best friend Christina Lahti who is now pregnant with child.
script/directed Alan Burns

VIOLETS ARE BLUE — Columbia (4/18)

stars: Sissy Spacek
Kevin Kline
Bonnie Bedelia
Jim Shankford

Photojournalist Sissy Spacek returns to home town after a 15 year absence and rekindles her affect-on for first love Kevin Kline, now married with a son.

directed: Jack Fiske (Sissy's husband)

Am speaking with Craig on word of mouth on these.
What do you think?

DEPOSITION EXHIBIT Karl 6
11-7-90 MK
001083

BERNARD E. SCHNEIDER

Volunteer Committee

WE 1543 3/6/84

February 24, 1986

? you + Ottis attending?

Stuart Karl
17942 Cowan
Irvine, CA 92714

Dear Stuart:

As you may already know, United States Senator Gary Hart will be in Orange County on Friday, March 14, 1986. The major public event will be held at 7:30 p.m. at The Port Theatre in Corona del Mar. The event will feature a short talk by Gary and preview showings of a yet to be released major studio motion picture and a film short about Gary and his ideas.

The 7:30 event will be preceded by a 6:00 cocktail at a nearby restaurant. I need your participation in the cocktail party as well as the 7:30 event. The cost of the cocktail party will be $150 per person or $250 a couple, which cost will include a respective number of tickets to the movie. The cocktail party will provide you with an opportunity to talk to Gary personally.

I would sincerely appreciate your help. Please respond by return mail in the envelope provided.

Very truly yours,

Bernie

DEPOSITION EXHIBIT Karl 7 11-7-90 MK

P.S. The check should be made out to Americans with Hart. If you are mailing out to that committee, please make your check payable to The Volunteer Committee which is a new committee formed by Gary to provide field assistance to the election of Democratic candidates in 1986.

RECEIVED FEB 26 1986 STUART KA

091163

9304350 43900

NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES

BUSINESS REPLY MAIL
FIRST CLASS PERMIT NO. 47967 LOS ANGELES, CA.

POSTAGE WILL BE PAID BY

BUCHALTER, NEMER, FIELDS, CHRYSTIE & YOUNGER
610 Newport Center Drive
Suite 1040
Newport Beach, CA 92660

001164

ATTN: Bernard E. Schneider

9304354391

KARL VIDEO

From The Desk Of
Rama White

TO: SK
FROM: RAMA
DATE: 5/23/84

Per my conversation with Mr. James Dwynell, K.V.C. bought equipment from Hart Campaign, and the Hart Campaign is leasing it back.

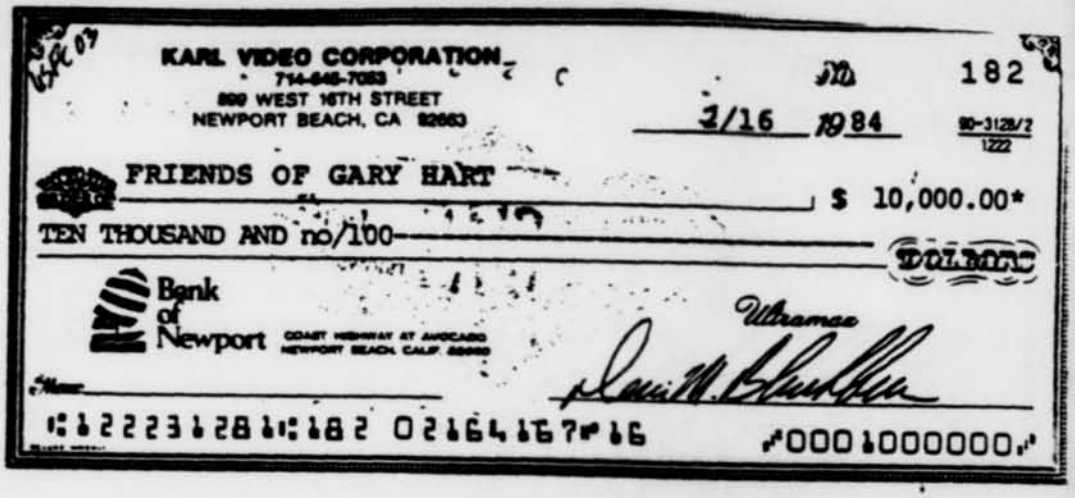
Mr. Dwynell says we should ignore bills. I must say he didn't have much interest in explaining this lease to me. I asked him if he feels everything is "in order" and he said yes, don't worry. Who can tell? This is one of the questions Peter Bagatellos asked me -"Is these lease legal and was it done correctly?"

KW

JLS
hdd o/TO

930435 043992

DEPOSITION EXHIBIT Karl 8
11-7-90 MK



KARL VIDEO CORPORATION
714-646-7053
899 WEST 16TH STREET
NEWPORT BEACH, CA 92663

182

2/16 1984

90-3128/2
1222

FRIENDS OF GARY HART

$ 10,000.00*

TEN THOUSAND AND no/100 DOLLARS

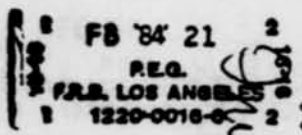
Bank of Newport
COAST HIGHWAY AT AVOCADO
NEWPORT BEACH, CALIF. 92660

Ultramar

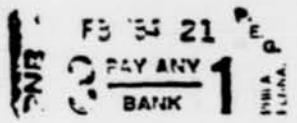
Dan M. Blumenthal

⑆122231281⑆182 02164167⑈16 ⑈0001000000⑈

9304350 43993

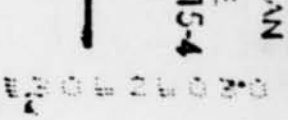


FEB 84 21
R.E.C.
F.R.B. LOS ANGELES
1220-0016-0



FEB 84 21
PAY ANY
BANK
1

⑆122205⑆



FEB 21 '84

15-4

PAY ANY BANK

15-4

FEB 84 21
R.E.C.
F.R.B. LOS ANGELES
1220-0016-0

Dr Deposit Only
Friends of Gary Hart

[redacted], INC.

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

[redacted] 25962 Ivy Glenn #180 Laguna Nigel, CA 92677	Sale/Leaseback - computer equipment	√Primary		
	Aggregate 20,000.00		2/21/84	20,000.00
Stuart Karl 899 West 16th Street Newport Beach, CA 92662	Sale/Leaseback - office furniture	√Primary		
	Aggregate 10,000.00		2/21/84	10,000.00
Subtotal of receipts this page				30,000.00
Unitemized amounts				19.12
Total this period				30,019.12

93;04 3 5 1 4 3 9 4

INVOICE NUMBER

279629

Telautograph

©TELAUTOGRAPH CORPORATION / 8700 BELLANCA AVE. LOS ANGELES. CALIF 90045
(213) 641-3690
D-U-N-S 00-828-7302

BILL TO

Americans with Hart camgaign/Karl Video
899 West 16th St.
Newport Beach, CA 92663

SHIP TO

SAME

507 8th St., SE
Washington, DC 20003

CUSTOMER P.O. NO	CUSTOMER NO	CODE	SALES ORDER NO	SALES	SERVICE	STATE	INVOICE DATE
Sales Agreement	1371-48	E	26502	664	650	08	5-4-84 gr

ORDER DATE	DATE SHIPPED	SHIPPED VIA	TERMS
			NET 30 DAYS

QUANTITY	DESCRIPTION	DIST. CODE	UNIT	AMOUNT
	PURCHASE OF TELAUTOGRAPH EQUIPMENT PER ORDER 26502:			
2	G39 Omnifax $ 3,500.00 each G39-2050, G39-2051	133700		$ 7,000.00
1	G39 Omnifax Paper 45-5018	163700		117.00
	Installation	191100		125.00
	6% State Tax	199900		434.52
	Freight and Handling	192200		180.00
				$ 7,856.52

9304353439 5

WE HEREBY CERTIFY THAT THESE GOODS WERE PRODUCED IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS OF SECTIONS 6, 7, AND 12 OF THE FAIR LABOR STANDARDS ACT, AS AMENDED, AND OF REGULATIONS AND ORDERS OF THE UNITED STATES DEPARTMENT OF LABOR ISSUED UNDER SECTION 14 THEREOF

VALIDATED BY

DATE	INITIAL	DATE	INITIAL
5-2-84		5-4-84	

002533

FORM NO. 3007 REV. 2-78

CUSTOMER

DEPOSITION EXHIBIT 9
Karl
11-7-90 MK

Telautograph

Since 1888

April 24, 1984

American With Hart Campaign/Karl Video
899 West 16th Street
Newport Beach, CA 92663

Attention: James Dwinell

Subject: Agreement # 26502

Dear Mr.Dwinell:

Thank you for signing the contract. Attached is your copy of subject agreement, with our acceptance.

We welcome this opportunity to serve you.

Very truly yours,

TELAUTOGRAPH CORPORATION

Saul Minkus
Director, Sales Order/Collections

SM:jl

Enclosure

cc: A. Moran - Clifton

Customer Number: 1371-48

9304353396

002530 Z

Telautograph

Telautograph Corporation / 8700 Bellanca Avenue
Los Angeles, California 90045 • 213 / 641-3690

DATE April 12, 1984

SALES AGREEMENT

SOLD TO: Americans With
Hart Campaign/Karl Video
899 West 16th St.
Newport Beach, CA 92663

SHIP TO: Americans With
Hart Campaign Headquarters
507 8th St., SE
Washington, DC 20003

Telautograph Order * 26502
Customer * 1371-48
TO BE FILLED IN AT TELAUTOGRAPH HOME OFFICE

Quantity	Model	Description	Unit Price	Extended Price
2	G-39	OMNIFAX Facsimile	$3500.00	$7000.00

* Service included for life of the campaign.

** Installation charge one terminal only.

Extended Equipment & Accessory Total *$7000.00

One Time Installation Charge **$ 125.00

Supplies: Description	Price
1 ca-45-5018 Paper	$117.00

TERMS: Net 30 Days
Invoicing to occur at time of shipment
F.O.B. ORIGIN - Air Express - No inside delivery

SALES TAX WILL BE ADDED UNLESS EXEMPTION CERTIFICATE NUMBER SUPPLIED

This Sales Agreement is subject to all the terms and conditions on the reverse side thereof.

This agreement shall be effective when accepted by Telautograph

Accepted Telautograph Corporation

By SAUL MINKUS

Title Director, Sales Order & Collections

Date 4/19/84

Customer's Acceptance

By Americans With Hart Campaign/Karl Video

Name James Duncan

Title Deputy Campaign Manager for Finance

Date 4-13-84

FORM 2041 REV 6-77

002537

3

Telautograph

Telautograph Corporation
8700 BELLANCA AVENUE LOS ANGELES, CA 90045 (213) 641-3690 D-U-N-S 00-828-7302

INVOICE NUMBER 553028

[redacted] 1371-48 135439

SIGNED AGREEMENT

SOLD TO
AMERICAN WITH HART CAMPAIGN
KARL VIDEO
899 WEST 16TH ST.
NEWPORT BEACH, CA 92663

SHIP TO
AMERICAN WITH HART CAMPAIGN
507 8TH ST S.E.
WASHINGTON, DC 20003

LOCATION	SALES AREA	SERVICE	ORDER DATE	INVOICE DATE	DATE SHIPPED	TERMS:
8-001-0010	664	650	4/13/84	5/09/84	4/23/84	NET 30 DAYS

SHIPPED VIA
WITH EQUIPMENT/IMPERIAL

QUAN	PART NO	DESCRIPTION	UNIT	AMOUNT
1	45-5018	PAPER,RECORDING-OMNIFAX/G39,CAS	117.000	117.00
		DISTRICT OF COLUMBIA STATE TAX	6.000%	7.02

WE HEREBY CERTIFY THAT THESE GOODS WERE PRODUCED IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS OF SECTIONS 6 AND 12 OF THE FAIR LABOR STANDARDS ACT, AS AMENDED AND OF REGULATIONS AND ORDERS OF THE UNITED STATES DEPARTMENT OF LABOR ISSUED UNDER SECTION 14 THEREOF

PLEASE PAY THIS AMOUNT ▶ 124.02

TO ASSURE PROPER CREDIT, PLEASE REFER TO INVOICE NUMBER OR RETURN INVOICE COPY WHEN REMITTING. THANK YOU

TO RE-ORDER OMNIFAX PAPER CALL TOLL FREE 1-800-225-OMNI
(7AM-5PM PST)

002535

FORM NO 3007 REV 12/82 INVOICE

9304353439 8

4

Telautograph
Since 1888

Telautograph Corporation / 8700 Bellanca Avenue, Los Angeles, California 90045 • 213/641-3600

received
7-19-84

STATEMENT OF ACCOUNT

DATE	CUSTOMER NUMBER
6/29/84	1371-48

AMERICAN WITH HART CAMPAIGN
KARL VIDEO
099 WEST 10TH ST.
NEWPORT BEACH, CA 92663

DATE	[redacted]				[redacted]
5/04/84	279629		7,856.52		
5/09/84	553028		124.02		
CURRENT	[redacted]				
	7,980.54				7,980.54

002543

930435303399

5

KARL VIDEO

From The Desk Of
Rama White

1. Call Doug Rosen.
Ask these questions
& what type of equipment?
How does Doug want
to do it? (be easy)
A. SK buys $10,000.-
B. they lease back

2. Call Landy Thompson @
2020 Film Productions N.Y.
(202) 541-1999
544-1659
- Ask for budget that
we could attach to
the "bill" for $1,000.-

9304353 4000

002527

DEPOSITION EXHIBIT
Karl 10
11-7-90 MK

Purchase Documents for Inv

Doug Rowe

Equipment Lease

(1) Detail List of equipment + cost of each item (total $10,000)

(2) Who pays for insurance

(3) Term of lease
(4) Frequency of payments
(5) Monthly payment
(6) who pays to ships everything back down here at end of lease
(7) Do They want a purchase option at end of lease

(1) They need to complete bottom 1/3 of page

9304353 401

002528

KARL HOME VIDEO

SERVICES FOR HART CAMPAIGN

1984

PAYEE	DATE	PAYOR	EXPLANATION	AMOUNT
2020 ELM PRODUCTIONS	1/31/84			17000 -
AMERICANS WITH HART	2/84	KARL HOME VIDEO	PURCHASE FURNITURE	10000 -
2 STROTHERS	3/84	✓		19000 -
2 STROTHERS	4/84	KARL PRODUCTION CORP		25000 -
2 SHERMAN GALANTY	5/84	✓		22200 -
HARMAN PRESS	✓	KARL HOME VIDEO	WIRE TRANSFER	70525
DEFRANCE PRINTING	✓	✓	✓	2.00
T. MC EWEN	✓	✓		424800
Audio Visual West	6/84	✓	Wire Transfer	45000
THE HARMAN PRESS	✓	✓	✓	22897
THE HARMAN PRESS	✓	✓	✓	47950
MARIO ROMERO - SECURITY PACKAGING	✓	✓	✓	12500 00

TOTAL CHARGED TO RECEIVABLE FROM HART ACCOUNT ON KVC BOOKS 107 72830

TOTAL CHARGES ABOVE 107 72830

LESS: BURTON THESECO NOT BILLABLE (INC PURCHASED / LEASEBACK OF FURNITURE) < 10000 >

JUNE CHARGES (BILLING WAS FOR CHARGES THRU MAY) < 2408 48 >

AMOUNT BILLED TO AMERICANS WITH HART BY KARL VIDEO CORP 95520 -

AMOUNT OF HART LIABILITY PER SETTLEMENT AGREEMENT 96030 42

DIFFERENCE - REASON UNKNOWN 510 -

002430

DEPOSITION EXHIBIT Karl 11 11-7-90 AK

93043553444402

9 3 0 4 3 5 3 4 4 0 3

← Gary Hart →

Feb	KVC checking		(10,000)	- Gary Hart
March -	KVC ultra	✓	18,000	- R. Strothers
April -	KPC Ultra -	✓	25,000	- R. Strothers Ltd
May -	KPC checking	✓	22,000	- (CK to Zimmerman Colorado)
" -	KVC Ultra	✓	13,520.42	9,052.52 - wired to Hanson Farms 219.90 - wired to Trans 4,248.00 - J. McEwen
June -	KVC checking -		(2,408.48)	wired to various P's
			90,928.90	

January 31 - 2020 Sales Products Purchased 17,000 00

$ 107,928.90.

Dennis — Hart should be billed for The $10,000 in Feb. + $2,408.48 in June — /s

15 Cars @ $500 for 3 weeks in Convention - '75

000328

[redacted]

RAYMOND STROTHER LTD
[redacted]

Invoice

March 28, 1984

Americans with Hart
507 8th Street, SE
Washington, DC 20003

Attn: James Dwinell

930435044044

STATEMENT OF ACCOUNT

Balance Due	1/10/84	$ 3,757.07 ?
Production Billed	2/8/84	11,083.74 ~ 95
Production Billed	3/2/84	7,723.64 ~ 69
Production Billed	3/15/84	3,844.96 ~ 87
Production Billed	3/20/84	11,150.34 ~ 36 ~ 37
Production Billed	3/25/84	8,933.01 ~ 17 - missing slipper
Production Billed (Karl's Video)	3/25/84	18,249.08 ~ 16 - No document
Production Billed	3/29/84	29,191.90 ~ 3
TOTAL Billed		$93.933.74 ?
Less Payments/Advances (including $18,000 from Karl's Video) ~ 16		-61,199.17 ?
BALANCE DUE		$32,734.57 ?

00031

Invoice

March 25, 1984

Karl Video Corporation
West 16th St.
Newport Beach, Ca 92663
Attn: Rama

Produciton Expenses:

20-20 Film Production	3/4/84	$ 4,337.00
Roger Jacobs	3/4/84	1,218.73
Recording Place	3/8/84	90.00
Color Lab	3/4/84	355.06
David Perry	3/5/84	1,980.00
	3/13/84	1,320.00
	3/2/84	199.62
Interface	3/19/84	4,991.86
	3/19/84	1,146.39
SUBTOTAL:		$ 15,638.66
10% Administrative Overhead		1,563.81
TOTAL:		$ 17,202.47
Balance due from 20-20 Film Productions:		1,046.61
		$ 18,249.08
LESS: Payment		(18,000.00)
BALANCE DUE:		$ 249.08

CC: James Dwinell

9304350 44405

00032

LAW OFFICES OF
BAGATELOS & FADEM
ATTORNEYS AT LAW
ONE MARITIME PLAZA
SUITE 2500
SAN FRANCISCO, CALIFORNIA 94111

BARRY FADEM
PETER A. BAGATELOS

TELEPHONE
(415) 362-1840

March 7, 1984

Mr. Jack Quinn
Attorney at Law
Arnold & Porter
Thurman Arnold Building
1200 New Hampshire Ave., N.W.
Washington, D.C. 20036

Re: Stuart Karl

Dear Mr. Quinn:

This will confirm our telephone conversation on March 2, 1984. With regard to one item of our discussion during that conversation, we are forwarding this letter at your request regarding a payment which was made by Stuart Karl in the amount of $5485 for airplane tickets for volunteers who flew to Iowa to work with the Hart campaign.

As agreed, this amount should be reimbursed to Mr. Karl by the Hart campaign. By this letter, we are formally requesting that the Committee make reimbursement of the aforesaid amount in a prompt fashion. Enclosed is a receipt for the amount indicated.

Thank you for your assistance. Please call me if you have any questions.

Sincerely,

Peter A. Bagatelos

Peter A. Bagatelos

PAB/mlh

cc: Stuart Karl

9304350 44006

001848

DEPOSITION EXHIBIT
Karl 12
11-7-90 MK

OGC 8765

TRANSCRIPT OF PROCEEDINGS

UNITED STATES OF AMERICA

BEFORE THE

FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 NOV 29 AM 12:01

- -x

IN RE:

M U R 2583

- -x

2304357407

DEPOSITION OF GEORGE STUART KARL, JR.

(CONTINUED)

Washington, D. C.

Thursday, November 8, 1990

ACE-FEDERAL REPORTERS, INC.
Stenotype Reporters
444 North Capitol Street
Washington, D.C. 20001
(202) 347-3700
Nationwide Coverage
800-336-6646

UNITED STATES OF AMERICA

BEFORE THE

FEDERAL ELECTION COMMISSION

- -x
:
IN RE: :
:
M U R 2583 :
:
- -x

DEPOSITION OF GEORGE STUART KARL, JR.
(CONTINUED)

Washington, D. C.

Thursday, November 8, 1990

Deposition of GEORGE STUART KARL, JR., called for further examination pursuant to agreement by counsel, at the Federal Election Commission, 999 E Street, N.W., Sixth Floor, at 9:30 a.m. before RONALD J. WILSON, Court Reporter, when were present on behalf of the respective parties:

PATTY REILLY, ESQ.
JOSE RODRIQUEZ, ESQ.
JONATHAN A. BERNSTEIN, ESQ.
Federal Election Commission
999 E Street, N.W.
Washington, D. C. 20463
On behalf of the Commission.

LAURIE S. FULTON, ESQ.
Williams & Connolly
Hill Building
839 Seventeenth Street, N.W.
Washington, D. C. 20006
On behalf of the Deponent.

9304353408

C O N T E N T S

WITNESS	EXAMINATION
George Stuart Karl, Jr. (Resumed)	
by Ms. Reilly	253
by Mr. Bernstein	477

E X H I B I T S

KARL DEPOSITION NUMBER	IDENTIFIED
Exhibit 13 - 6/7/83 memorandum	254
Exhibit 14 - 7/3/84 memorandum	267
Exhibit 15 - List of expenses	270
Exhibit 16 - Invoices	295
Exhibit 17 - Handwritten notes and retainer document	328
Exhibit 18 - Ledger page	367
Exhibit 19 - 12/4/86 letter	385
Exhibit 20 - Ledger pages	389
Exhibit 21 - Loan documents	397
Exhibit 22 - Agenda	405
Exhibit 23 - 7/2/86 letter	411
Exhibit 24 - 7/15/86 letter	416
Exhibit 25 - 8/15/86 memorandum	422
Exhibit 26 - Memorandum and attachments	425
Exhibit 27 - Ledger page	426
Exhibit 28 - 10/7/87 letter	427
Exhibit 29 - Copy of postcard, and other correspondence	431
Exhibit 30 - 3/13/85 letter	437
Exhibit 31 - 4/23/85 letter	443
Exhibit 32 - Copy of newspaper article	445
Exhibit 33 - 10/17/85 letter and attachment	450
Exhibit 34 - 2/20/86 memorandum	459
Exhibit 35 - 6/3/86 memorandum	465
Exhibit 36 - 6/24/86 letter	472
Exhibits 37 and 37A - Description of Hart group, and application	475
Exhibit 38 - Flight logs	497
Exhibit 39 - Flight logs	502
Exhibit 40 - Group of invoices	504
Exhibit 41 - Flight logs	508
Exhibit 42 - Flight logs	510
Exhibit 43 - Flight logs	511
Exhibit 44 - Flight logs	512
Exhibit 45 - Flight logs	513
Exhibits 46, 47 and 48 - Flight logs	513

9304357 4409

PROCEEDINGS

Whereupon,

GEORGE STUART KARL, JR.

resumed the stand and, having been previously duly sworn, was examined and testified further as follows:

EXAMINATION (Continued)

BY MS. REILLY:

Q We swore you yesterday. We will let your swearing apply to today as well. I remind you again that you are under oath and it is important to tell the true story and the complete truth, that it is important to answer all my questions completely and fully and that you should try to respond to the best that you recollect. Do you understand that?

A Yes.

Q Okay. Do you have a statement you want to make?

A No. Off the record?

Q Off the record.

(Discussion off the record.)

BY MS. REILLY:

Q One of the things I want to discuss with you if I could is your involvement with the 1984 Democratic

9304351410

convention and you may recall that convention occurred in July of 1984. At this point I would like to introduce an exhibit that may -- I will hand this to the court reporter and I believe as of yesterday we were up to Exhibit 13.

(Karl Exhibit 13 identified.)

BY MS. REILLY:

Q I will ask you to take a look at that, please. Have you had a chance to examine the entire document?

A Yes, I looked at it.

Q Do you recognize it?

A Yes, I have seen it before.

Q When did you see it before?

A The last time I was interviewed like this.

Q Had you see it at a time prior to that?

A Not that I recall the exact time and place.

Q The first page, can you describe that for us, please?

A I guess it is a memo from Betsy Kinney of the Americans With Hart to Rama White, R-a-m-a, talking about his list of staff people for the convention and who will require rental cars.

9304353411

Q Can you tell me a little bit about how the Hart people came to ask you for rental cars?

A How do you mean? Could you be more specific?

Q Did you have conversations with anyone in the Hart committee regarding renting rental cars?

A I cannot recall an exact conversation. I can't recall specific conversations. I am assuming, if I can speculate a little --

Q Sure.

A -- that obviously my father was in the automobile business which probably didn't go unknown to people in the Hart campaign. And again I cannot -- I am just assuming that they probably said well, Stuart is in the video business and his father is in the car business, call him for rental cars.

Q At the time --

A Again, that is speculation. I am trying to connect the dots.

Q Okay.

A Again, this probably falls in the category of the hounding, where they're calling, the convention. Probably I just -- you know, again having Rama was just

9304353 4412

interfacing with these people, yes, have Betsy call Rama. I don't know if I even said that to anybody. It is clear to me that she was communicating with them about this.

Q Did you discuss this with Rama, the rental situation?

A I don't recall.

Q Is it the sort of thing she would do independently as part of her job responsibilities?

A If I would have said you deal with it, I am busy running a business, or whatever, she would have taken over the responsibilities and done it. Obviously it is my responsibility but I am sure it probably was delegated and the fact this is a detailed type of thing I would not spend my day doing.

Q This is June '83 actually I think that is incorrect because the convention was in fact in '84 and I believe that she typed the wrong date on the top. What was going on in your business in June of 1984?

A I was probably negotiating the sale of my company which was completed in October of 1984. We were growing pretty quickly. I mean, I cannot recall exactly. In fact I know we were -- we had the two or three top hits

9304353413

in the business.

Q That was the Fonda Workout?

A Exercise tapes.

Q Did it bother you at the point that the Hart people were calling up and beginning to hound you for rental cars?

A I don't know if I can specifically say it bothered me that they were hounding me for rental cars. I don't know if it is necessarily anything I shared with anybody in terms of how I really felt. I probably never addressed myself to what is going on here. It just seemed like just part of what was going on. It was just a general sense of like, oh, okay.

Q Sort of one more thing they are asking for?

A I am trying to recollect now, looking -- a lot of this unfortunately is in hindsight. If you had taken my deposition June 8th I may have had a different feel for it in '84.

Q There is a grouping that says "early cars as soon as possible for the convention" and it is a list of people underneath it. Do you recognize any of those names?

9304353 4414

A Betsy Kinney I recognize.

Q Betsy Kinney. I'm sorry. Who is she?

A Very attractive lady. Betty Kinney, you see Betty Kinney, you remember. Like you see Farah Fawcett, you remember Farah Fawcett. I don't know the exact title but obviously she was someone that was involved, I think was involved in the organization. I think she was also involved in the Carole King concert.

Q Did any of these people here -- did you have any conversations with them regarding rental cars?

A I don't recall.

Q You don't remember anybody saying thank you for the rental car?

A No, I don't remember anybody saying thank you for the rental car. The interesting thing I mentioned at some point in time Scott Van Hove's name I thought about and thought about and I cannot recall and don't know if it is a fact or not, but part of me says he may have been involved in going to Iowa but I could not clearly say that to you.

Q Bring saying involved going to Iowa --

A The airplane tickets. I was always curious if

9304353 4415

he lived in San Francisco because he may have been the guy who called me but I'm trying so hard to --

Q Anybody else in that group?

A In the "early cars"?

Q Right.

A Not that I recall.

Q How about the second group?

A Doug Wilson was the other name I mentioned. I could not figure out earlier who was in the campaign office regarding finance. He worked out of Hart's Senate office and from what I understand he was going to become or became one of the finance people.

Remember, I told you there was another name besides Dwinell. I now know who Keith Glaser is, obviously. Ely -- Siegal, Will Canteras.

Q Tell me how you came to know who Keith Glaser was?

A I don't recall the first time I met him.

Q Sort of in general?

A I think he was someone involved in planning the convention.

Q Okay.

9304353416

A I don't know if I met him or he called me.

Q You had some prior contact?

A I don't know about prior. Possibly. It is hard for me to say. It may have been with the convention or it may have been earlier, I don't recall.

Q How about Ely or --

A Ely Siegal. I only met him once at the convention. He was a businessman. He was not a campaign worker per se. I think he was at the higher levels of the campaign.

Q Did you have any conversation with him?

A Yes, I think he called me a couple times, too, and I've tried to recall those exact conversations and previous discussions like this and there may be some paperwork that relates to Ely Siegal notes which you may have. In fact, he may have called me as we were talking here a lot. In fact, I think you know, you said did they ever thank me? I think the first time I met Ely Siegal face to face he thanked me.

Q Making him memorable?

A I think so.

Q With him did you discuss the fact that you had

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used some of your corporate money and some of your personal money?

A I don't recall.

Q Did you have any sense he might be doing the same thing?

A No. I mean I don't -- I -- first off, you understand at that point in my life I understand the difference or the ramification of corporate or personal money. I was living under an assumption. I mean I am trying to in hindsight reflect back in terms of -- I assumed responsibility for what I have done obviously I have been through this and you know what's happened to my life in the last couple of years but I don't feel at the time I was sensing this is personnel and this is corporate.

Q It is sort of your money?

A Yes. I never -- it sounds very irresponsible. In terms of did I sense he was, it is like --

Q You didn't know enough to sense it?

A I could just use an analogy with you, but at this point I would rather not.

Q We can delete it if we need to.

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A It is like my little boy who plays soccer. He does not know necessarily the rules of the game but he plays the game. When he is 20 years old he will say I should not have gone out of bounds or off sides now I know that but at the time he was just playing the game.

Q Was there any business reason for the corporation to be paying these bills?

A Business reason?

Q I guess what my question really says is they were part of campaign stuff and not corporate cars; is that connect?

A I think it is clear. Don't you believe that is the case?

Q Yes, but I wanted to hear you say it. So it is correct; right?

A I mean in hindsight, looking at it now, the fact is these are campaign cars to campaign and not people who worked for Karl Video.

Q If you can turn to the second page of this exhibit and let's just take a moment to review it, please. Have you had a chance to review this page?

A Yes.

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Q Do you recognize it?

A Yes.

Q And could you describe it for us?

A It's a memo from Rama White. I don't know who it is to. I think it is like Herbowitz, just kind of looks like Herbowitz. I don't think this was sent to me.

Q But it is on Karl Video stationery?

A Yes.

Q It is discussing yet again more rental cars?

A Yes.

Q And appears to be for the convention; is that correct?

A Well, tie it to the document that you showed me prior and the dates and times, it would probably be for the convention, yes.

Q You cannot think of any other business reason you would be putting people in rental cars around San Francisco convention time?

A Not these people.

Q Speaking of which, you got the first group. Midway down in the page, there are five of them?

A Yes.

9304353 4420

Q Do you know any of those people besides the one we previously --

A Keith Glaser. Mark Elmwood for some reason rings a bell, but I don't recall why.

Q Does he ring a bell in the context of being a Hart person?

A You meet a lot of people. Yes.

Q Anyone else in the group?

A Well, Keith Glaser.

Q What about the next one down, Paul Kerry?

A I cannot recall who that is.

Q And the next two?

A I cannot recall.

Q And then the last grouping of six?

A Lynn Williams. I don't know how I got to know her more, but I think she was around a lot.

Q By "around a lot," that is with the Hart organization?

A Yes.

Q Do you know why those people had cargo vans --

A No.

Q -- as opposed to cars? This woman, Jean Shahim,

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is she familiar to you?

A No. Who is she, do you know?

Q Actually I don't know. If you can return to the first page, the last name in the second group?

A Yes.

Q Do you know who that person is?

A Ken Terrace.

Q Who is he?

A Can you be more specific?

Q Is he associated with the Hart campaign?

A I don't know his official title. I know he was around the Hart campaign a lot. I think he was just around. I don't know exactly what he did, but I sense he was in favor or something. He was around a lot. He seemed like a nice guy.

Q When you say he was "around the Hart campaign," what do you mean?

A When I went to the convention he was there and I saw him at a couple fundraisers that we had talked about before. But he didn't seem like he had -- in fact he didn't seem to have an official title like a Rosen or a Wilson. In retrospect I think he was also involved with

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Carole King for some reason. I think he knew Carole or helped with that.

Q The Carole King fundraiser?

A Carole King in general. He is from New England. Vermont, maybe?

Q The third page of this exhibit, this is your father's business card?

A Yes.

Q This is his business?

A Yes.

Q And did you rent cars from your father's business for the Hart people?

A I don't know exactly who she rented that from but obviously if it involved automobiles I would not be surprised if they called my dad. I think he had a small rental car company in addition to the leasing company.

Q To the best that you can recall, would this be a list, complete listing of all of the cars that you provided to the Hart people for the convention?

A It is hard for me to say. I am assuming if Betsy gave her this and Rama gave her that, unless there is other documentation it is hard for me to say.

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MS. REILLY: At this time I will move to Exhibit 14, please.

(Karl Exhibit 14 identified.)

BY MS. REILLY:

Q I hand it to the witness and ask you to look at this, please.

Have you had a chance to review this exhibit?

A Yes.

Q And do you recognize it?

A It's on Gary Hart's stationery. I don't recall when I saw it.

Q It is a letter addressed to you?

A Yes.

Q It is providing for some cost estimates regarding the convention?

A Yes.

Q And who is is it signed by?

A Keith Glaser.

Q Had you met Keith at the time you had --

A It is hard to determine when I met Keith.

Q Look the last paragraph. It says "I look forward to meeting you"?

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A He probably hasn't met me yet. It is hard for me to say.

Q I was trying to refresh your recollection.

A You understand again I go back, my office was in Orange County, which was not necessarily right in line, if my office would have been in LA. I'm sure I would have met a lot of these people. It is hard to determine when I met these people because they just would not have the opportunity to come down to Orange County.

Q And had you talked with anyone in the Hart committee regarding helping to pay for some of the convention costs?

A It appears I talked to Keith Glaser and probably Doug Rosen.

Q How about Doug Wilson?

A Maybe. Remember, I mentioned he was involved in the finance.

Q Right.

A I may have had discussions with him. You understand, a lot of this period of time was I am involved in my company and these people are calling and it was like details, I was not like sitting down full-time, okay, I

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will arrange for rental cars or expenses. So I was delegating pretty much the details as I am responsible for -- but delegating details to Rama and people who work for me.

Q To touch on that for a bit, who primarily would be responsible for taking care of these details?

A I think -- from what I can see from the materials, it looks like Rama was involved in a lot of this. I don't think I sat down and said you're going to do this and delegate that.

Q You didn't really care as long as it got done; is that correct? You didn't care who did it?

A Cavalier approach. Care? Yes, as long as it got done. Obviously I cared who did it, you want someone doing it who's responsible.

Q If you can turn to page 2 of this exhibit heading "Budget," it has "item," "vendor," "cost" and "terms." The first item listed there is pads and on the right-hand corner it says "I am certain Marty thinks credit may be okay." Do you know who Marty is?

A No.

Q These vendors that are listed in the left column

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-- I'm sorry, under "vendor," do you see this?

A Yes.

Q Any of those that you have -- that you can recall that Karl Home Video worked with previously?

A Not that I recall.

Q You have looked at all of them?

A Yes.

Q And the total on the last page, $25,025.10, to the best of your knowledge, is that the amount that you spent for the convention activities?

A I would not be able to tell you that.

Q Did it seem about right?

A It is 1990. It is hard for me to tell you accurately what seemed right or wrong. I am not being evasive. I just don't remember.

MS. REILLY: Let me see if I can help you out. If we can mark Exhibit 15, please.

(Karl Exhibit 15 identified.)

BY MS. REILLY:

Q Have you had a chance to review this document?

A Yes.

Q Do you recognize it?

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A I have seen it before, yes.

Q Where did you see it before?

A I don't recall.

Q Have you seen it recently?

A No.

Q The first three pages, if you can focus on that for a second. Could you describe that for me, please?

A It looks like a list of vendors and amounts paid and how they were paid.

Q And it is entitled "Hart Activities at Convention"?

A Yes.

Q On page 3, bottom left-hand corner?

A Yes.

Q The initials SK, RW?

A Yes.

Q What would that refer to?

A Stuart Karl and Rama White.

Q The date?

A Probably the date she typed it.

Q Does this refresh your recollection regarding vendors that you may have paid to make expenditures for

9304353 4428

the convention?

A It appears obvious from looking at it, these are vendors for the convention based on why we're in this room and it appears to be expenditures made by us for them.

Q Do you doubt it is anything other than that?

A No.

Q The first item listed, "Defense printing," it notes it was wired by Cathy Brannick, requested by Steve Robins?

A Right.

Q Who was Steve Robins?

A I have no idea.

Q So he --

A I mean, I cannot recall.

Q But he was apparently the person requesting the payment and it says it was wired? Do you recall authorizing wire transfers during this period?

A No.

Q If you delegated the authority to someone else to make these expenditures, would that show authorization to wire money if necessary?

A I guess if the money had to get there, they

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would do what they had to do to get it there. I sense it was more requested by them than formed by us.

Q So if you authorized the payments, you would not need to authorize the wire payment?

A No. I would not be involved in that.

Q And -- I'm sorry. Who is Cathy Brannick?

A She worked for Dennis Blackburn. She was in accounting.

Q Dennis was the chief financial operator?

A I don't know his official title. He helped run the company with me. We discussed that yesterday. There it is -- it is chief operating officer.

Q And the total on page 3, $29,000 and some change, then there is an FIB total. Do you know who what "FIB" stands for?

A Probably First Interstate Bank.

Q What is the significance of First Interstate Bank?

A I don't know here. Maybe that was my personal account versus the corporate account.

Q That would be your best guess?

A Yes.

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Q Wasn't your personal account in the Bank of Newport?

A Like I said yesterday, I may have had more than one personal account. I didn't recall. I think I saw something yesterday that made me think my personal account was in the First Interstate Bank.

Q Could you have had an account at each during this time period, 1983 to 1987?

A I don't recall exactly but I may have had an account.

Q Do you have your bank records now?

A I don't know where they would be.

Q Have you seen them recently?

A No, not recently.

Q When you left Lorimar did you bring more of Lorimar's bank records with you?

A No.

Q How do you maintain your personal bank records?

A Excuse me. Be more specific.

Q Where do you keep it them?

A I know I got a box in my office now with the current statements in it. It is probably in the box

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somewhere.

Q Would you be willing to produce them to us?

A I don't know how to answer that. I don't know how to answer that. I am trying to be cooperative.

Q The best way to be cooperative would be to produce them.

A Is this a request to produce them?

Q Yes.

A Is this the format you do that in?

Q It is one of them, yes. Do you want to confer with counsel?

A Yes.

Q Okay.

(Discussion off the record.)

BY MS. REILLY:

Q Before we went off the record we discussed if you would be willing to produce records for your savings and checking account. Would you be willing to do so?

A On advice of counsel, I am not willing to turn those over.

MS. REILLY: Okay. Off the record.

(Discussion off the record.)

9304353143 2

MS. REILLY: On the record.

MS. REILLY: While we were off the record we discussed whether or not Mr. Karl was required to produce his checks and other banking statements to the Commission pursuant to the subpoena. There is apparently a Fifth Amendment issue which is being raised by counsel and she has represented she will review the bank statements and checks as they are produced and will get back to us regarding the privilege issue.

BY MS. REILLY:

Q And just so we are clear on that, do you have an idea when you will be able to give that to your counsel, Mr. Karl?

A How much time do I have?

Q Could you do it within the next two weeks, do you think?

A The problem is you have Thanksgiving.

Q How about three weeks?

MS. FULTON: Are we talking about 1982 to 1987?

THE WITNESS: The problem is, I don't have them I'll have to ask the bank for them. And if the bank gets them, I think they may need four to six weeks.

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BY MS. REILLY:

Q Why don't you look for them in the three-week time period and if you don't have them, go to the bank and let your counsel know, who can let us know, and we will be squared in terms of where they are?

A Fine.

Q When Stuart gives them to counsel we would ask you that you review them in an expeditious manner as you can arrange.

MS. FULTON: Of course.

MS. REILLY: Thank you.

BY MS. REILLY:

Q Okay. If you can turn to page 4 of the exhibit, please, and take a moment and look at that, please.

A Yes.

Q Have you had a chance to review this document?

A Yes.

Q Could you describe it for me?

A It is a letter from Dennis Blackburn to the Bank of Newport.

Q And the account number listed at the top 0216416716 that identifies that "as our account."

9304335 4434

A Yours or mine?

Q "Ours" in quotes. That would be Karl Video Corporation's account?

A It must be.

Q And discusses certain wire transfers?

A Yes.

Q And at the top of the page in the right-hand corner there is a note. Do you recognize that handwriting?

A That is mine.

Q What does the note say?

A "Rama: Major project. You must hound me on doing a billing to the Hart campaign Monday."

Q Do you remember writing that note?

A Not as I sit here right now.

Q But it is your handwriting?

A Yes.

Q And what do you understand that note to mean?

A Probably we should bill the campaign for all of this stuff.

Q So am I correct in assuming you had an expectation of being repaid, regarding at least for the

9304335

documents -- at least for the transactions listed on this page?

A It appears so. That is why I asked her to hound me.

Q Did she hound you?

A I don't recall.

Q Look at the note again for a second. You see it says, "you must!" Any significance to that?

A I think when you run a company you have a general sense, you tell people to do things and sometimes they don't do them. Probably to let her know you must hound me. There may have been -- who knows why I put that? I am speculating now, "you must."

Q It seems like perhaps you thought it was important?

A If that is what you say.

Q No. I don't want you to adopt what I am saying. I want to try to see if I can get you --

A I don't recall. I am not trying to be difficult but it is hard for me to speculate on why and how I felt.

Q If I can turn to page 6 of this exhibit, please. I will ask you to take a moment and -- are you on

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6?

A Mine says 9.

Q I am referring to a document that has from the desk of --

A That is the same one.

Q Which is marked in the exhibit --

A No, I'm not on the same one. 306.

Q There's the notation at the bottom that says "call Tom Epstein"?

A Yes.

Q Do you know who he is?

A Tom Epstein, now I do, yes.

Q Who is he?

A How do you mean?

Q Is he a friend of yours?

A I would not say he is a friend. I know who he is --

Q At the top of the page it says "Tom Epstein of Hart." So you can infer he was with the Hart campaign?

A I guess we could infer that. I don't know.

Q What does he do for a living, Tom Epstein?

A I think he is currently head of publicity for

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the Disney Corporation, the Disney Channel.

Q When was the last time you saw him?

A Geez, I think I bumped into him at the airport two or three years ago, just "hi." I cannot recall.

Q Is he someone that you communicated with regarding Hart activities?

A I don't remember.

Q Can you tell me anything else about Tom Epstein?

A How does he look? How tall he is? I know after the campaign he came to me and talked to me about going to work for us going in the PR department. I know he worked on other campaigns. I sensed he was generally around candidates.

Q Sort of a "political junkie"?

A What is your definition of a political junky?

Q I cannot allowed -- how about Bill Bryant?

A I cannot recall that name.

Q Tom Epstein, when you were --

A You know, Epstein, thinking about it now, he may be involved in, I think in California, for Hart. He may have been involved at that level.

Q The state organization?

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A Yes.

Q Is he a friend of Bernie Schneider, by any chance?

A I would have to believe they know each other. I don't know if he had a friend, Bernie is an attorney in Orange County. Tom Epstein is in the entertainment business in Los Angeles.

Q Did you ever see them together?

A I don't know. I mean they would not strike me as being like --

Q Buddies?

A I don't know about buddies. What is your definition of "buddy"? Buddies are like two boys. It didn't seem to be --

MS. FULTON: It is 10:30.

MS. REILLY: Off the record.

(Recess.)

MS. REILLY: On the record.

BY MS. REILLY:

Q We have been discussing your activities regarding spending you had done for the '84 convention regarding Gary hart. Just to be sure I am clear on this,

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do you recall making any other expenditures that have not been listed on the documents that I have shown you so far, the rental cars and the second listing that --

A Regarding the convention itself?

Q Right.

A No.

Q You went to the convention?

A Yes.

Q Who did you sit with?

A Who did I sit with?

Q Yes.

A My wife.

Q Anybody else?

A I don't know if you really sit at the convention. When?

Q Okay. How long? Did you go all the nights it was running?

A I don't remember.

Q You remember being there on more than one night?

A Yes.

Q Were you there when Gary Hart addressed the

9304353 4441

do you recall making any other expenditures that have not been listed on the documents that I have shown you so far, the rental cars and the second listing that --

A Regarding the convention itself?

Q Right.

A No.

Q You went to the convention?

A Yes.

Q Who did you sit with?

A Who did I sit with?

Q Yes.

A My wife.

Q Anybody else?

A I don't know if you really sit at the convention. When?

Q Okay. How long? Did you go all the nights it was running?

A I don't remember.

Q You remember being there on more than one night?

A Yes.

Q Were you there when Gary Hart addressed the

9304353 4440

convention?

A Yes, I think so.

Q Did you talk to Gary Hart at the convention?

A Yes.

Q And what was the substance of that conversation?

A There was a meeting in his room, I don't know what it was about. I want to say it was about a speech but I don't believe that came up. I want to say it was about financing but it is hard to remember. I know there were some finance guys or people on the so-called finance committee at that meeting.

Q The finance committee was -- what was that?

A The finance committee that met at the Mayflower. Rosen gave out different levels I guess and this is real rough recollection.

Q Yes.

A And the finance committee guys wore pins, I guess they give you colored pins for what level you were -- this is a rough memory. I also remember sitting in the grandstands during the day with Dwinell for a minute with three or four other guys who were on the finance committee

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and they were talking about, Dwinell was going to give them a copy of Gary's speech and wanted their comments on it.

And I clearly remember at the time thinking to myself like give me a break, you know. These guys raise money and they will get a copy of Gary's speech and makes comments on, give it to back to Gary.

Q And Gary would incorporate the comments into his speech?

A I -- yes, I remember at the time thinking, what is wrong with this picture?

Q Did he ask for your comments on the speech?

A I think he saw the look in my eye, like, don't pull that on me I remember that was a sense I had, like they are not falling for this, but then again, then I think somehow that speech came up and who knows? I remember at the time it just seemed sort of odd.

Q He was sort of placating them?

A Those are your words. I don't know he --

Q I sense at a minimum he was not -- at a minimum you had a sense he was not taking their comments very seriously?

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A Who is "he"?

Q Was it Dwinell?

A I don't know if he took the comments serious or not. It is hard for me to -- I cannot tell you his motives. You have all of these other people involved, speech writers, and here is the three finance guys in the grandstands who don't even have passes to get on the floor and they are going to comment on Gary's speech.

Q The meeting you went to in Gary's room, was that the night that he addressed the convention?

A I don't recall.

Q Did you get a little pin from Doug Rosen?

A I don't recall. Yes, I think I did.

Q Did you wear it to the convention?

A I don't recall. Probably not.

Q Do you recall who else was at the meeting in Gary's room?

A I can remember the room as clear as day.

Q Gary was there; right?

A He came in and out. I am trying recall if he actually sat and was part of the meeting or if he came in and out.

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Q He was at least present occasionally, if not for the whole time?

A I don't think he was there the whole time. He may have come out and said something.

Q How about Doug Rosen? Was he there?

A It is hard for me to remember exactly. I would assume he was there.

Q Mike Novelli, do you recall him being there?

A No. I tried to get this light go on before and I am doing well when I remember the exact room.

Q You don't remember the room number?

A No. It was the corner living room at the St. Francis, the floor Gary was on.

Q Was Lee Hart, there?

A I don't remember that.

Q Was your wife there?

A No. It may have been why it was in the morning. She does not get up early.

Q Anything else that you can remember about the convention at all?

A How do you mean?

Q I mean do you remember going there and watching

9304353444

the balloons and confetti fall?

A It is hard not to remember stuff like that.

Q Tell me a little bit about it. What was it like?

A It was a convention. I had never been to a convention before. It was interesting.

Q Were there parties going on, too?

A I don't know your definition of a party. There was events. I mean I look at it more as events than parties. You put the delegates on a bus and you go to a reception.

Q Did you go on the bus with the delegates?

A Yes.

Q And where was the reception?

A Some huge house over by Nob Hill somewhere, beautiful estate where they had the reception.

Q Any other events that you went to?

A There was another meeting. I don't know if it was the next morning or another finance meeting. I want to think it is after, the day after he lost or didn't get the nomination. I don't know if that was before or after. There was another meeting in the room with other

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finance people.

Q It was --

A Another meeting in another room. It was finance-oriented and I am trying to recall if it was before or after. I don't recall.

Q And where was that?

A St. Francis Hotel.

Q There is at least two meetings that you recall regarding events where the finance people had gathered?

A Yes.

Q Did anybody mention the fact that you had paid for a bunch of stuff right before the convention?

A Remember I mentioned I met Ely Siegal? I may have met him at the convention and I may have met him earlier at another time. I don't recall.

Q Not so much thank you but a mention that you had done it?

A Maybe. I cannot recall.

Q Were there agendas at any of the meetings?

A I don't recall.

Q You don't recall getting a piece of paper?

A Do I have a piece of paper here for an agenda?

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Q No.

A I don't remember. Usually they would do agendas and things. There is another meeting that dawned on me. I went to another finance meeting in Denver. I don't know --

Q Go ahead.

A There was another meeting sometime, I am sure, between January and June in Colorado.

Q January-June '84?

A Yes, that I went to at the Executive Hotel in Denver.

Q That was talking about financing?

A It was a finance meeting. In fact, that may have been -- I don't know when that was. That may have been '85 or '86. That's right.

Q It was later?

A Yes.

Q But they were talking finance then, too?

A Yes. That was for the new campaign.

Q We can touch back on that later.

A I am sure we will.

Q So Gary doesn't get the nomination and everybody

9304353 4447

is disappointed but everyone goes home, so what did you do next about the fact the Hart people seemed to owe you a bunch of money?

A I don't recall.

Q Did you call them up and ask them?

A I don't recall. Maybe.

Q Aside from the two meetings we just discussed at the convention and with the finance people, do you recall any other time ever --

A Do you have something to help me refresh my memory?

Q I wish I did -- where the Hart people, anyone associated with the Hart campaign, acknowledged the fact that you had spent all of this money for them?

A That was 1984 and it is 1990.

Q Really what I am trying to get to is who knew in the Hart campaign what was going on? Did you [redacted] any sense that anyone did?

A You have a letter here from [redacted] and a letter from Betsy Kinney and you got calls from -- I think there is some records, calls from Ely Siegal and Tom Epstein and everybody else.

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Q Anybody else?

A That would indicate to me -- anybody else? Doug Rosen; maybe Billy Shore thanked me. But again I sense he thanked everybody for everything. That was kind of his job. A new guy shows up, hey, that's your job, thank him for something.

Q Who is Billy Shore?

A He was Gary's administrative assistant, as I recall. I don't know what official title he had. He was Gary's -- all the time, he traveled with Gary.

Q Shore traveled with Gary all of the time?

A I sensed that, yes.

Q So anytime you saw Gary during this period Bill Shore would be there thanking you?

A I don't want to say that.

Q Did you have more access to Billy Shore than you did to Gary?

A What do you mean, "access"?

Q Did you talk to him more frequently than Gary Hart?

A Yes. Of course. If you had to say how many times I talked to Gary and how many times I talked to

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Billy Shore, I talked to Bill Shore more.

Q Were you close to him?

A What down mean, "close"?

Q Were you friends?

A I don't know what you mean by "friends." You consider yourself friends. Not the friends like I confide about my, you know --

Q Deepest feelings?

A Deepest feelings or something but I am sure we were friends.

Q And how close was, to the extent that you know, how close was Shore to Gary Hart?

A I sensed very close.

Q Why do you sense that?

A You just sensed that.

Q They were together all of the time?

A They were together all the time and I sensed Billy was very, very close. That was my perception, extremely personal view.

Q It is also your perception Shore knew that you had paid for some of these expenditures; is that correct?

A I think that would be fair. I assume he knew I

9304353 4450

paid for some of the expenses.

Q So we cover all of the bases, Mike Novelli, did you have a sense that he knew?

A Novelli -- like I said, I don't really remember interfacing that much with Novelli.

Q How about Doug Wilson?

A That is one I don't remember interfacing that much with.

Q So you didn't have a sense that he knew you had paid for some of these expenditures?

A It is hard for me to say. I don't remember interfacing with him.

Q Just so we cover all the bases, did you have a sense Gary Hart knew you paid for some of these things, to the best of your knowledge?

A My honest opinion is I don't think he knew. I think he was oblivious to things like that.

Q Almost deliberately oblivious?

A Was -- what was the question?

Q Was he almost deliberately oblivious? In other words, he did not want to know?

A I could not comment on that. You are asking me

9304353 4451

to make broad assumptions. My assumption is I don't think he was deliberately oblivious. I think he had other things he was worried about and working on. I am trying to really tell you how I feel and I don't think it is like I will avoid hearing about this. I don't think it was an issue. I don't think it was in his realm of things he thought about.

Q What about Dwinell? Was he someone whom you had an impression knew you had paid for certain expenditures?

A Yes.

Q That's a definite "yes"?

A That's a definite "yes."

Q Why is that?

A I don't know. Because I think if you look at the documents and some of the notes, I think it is obvious he would have known.

Q Did you eventually enter into a debt settlement with the Hart people?

A Yes.

MS. REILLY: At this point I am going to mark Exhibit 16.

(Karl Exhibit 16 identified.)

9304353 4552

MS. REILLY: I want to hand to the witness what has been marked as Exhibit 16, please.

(Pause.)

BY MS. REILLY:

Q Have you had a chance to review this document?

A Yes.

Q And have you seen it before?

A Not that I recall. I am sure I have.

Q Can you describe the first page for us?

A An invoice from Karl Home Video to Americans With Hart.

Q The amount at the bottom?

A $95,520.42.

Q Is there a date at the bottom?

A Do you see a date?

Q It looks like 7-11-84.

A Yes. 7-11-84.

Q The next page of the exhibit?

A Clearly I have no idea who wrote this stuff on these things.

Q Good.

A The next exhibit is on Gary Hart stationery from

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Richard Wagner to -- with a memo to Rama enclosing a check for $9600, October 10th.

Q The next page, it looks like a copy of the check?

A Yes.

Q Dated September 29th, 1986 from Americans With Hart. The next page, a letter on Gary Hart stationery to you. Can you tell us who it is from?

A It looks like Mike Novelli.

Q And --

A It is hard to read the signature.

Q That is my guess as well.

What does the letter say?

A "Enclosed find a regular settlement form. After after you review, please" -- something.

Q Process?

A "Process if you agree with our proposal. It would be best for someone besides yourself to see the signature, to be the signature, Stuart. As always, we are most grateful for your kind help." I get more thank you's out of this in the last two days than I did at the time.

Q The next page? I'm sorry. Do you remember

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getting that letter, the handwritten one from Mr. Novelli?

A I don't recall at this point in time when I got that letter. I am sure I do remember getting it.

Q Or you are sure it happened?

A Yes. Am I supposed to be responding?

Q I want to give you a chance to read it.

A Okay.

Q Do you recognize it?

A Again, yes, I recognize it.

Q It is --

A Formal offer of settlement to meet the current obligation.

Q From -- it looks like the Americans With Hart committee?

A Yes.

Q And the next page, a document entitled "Debt Settlement Agreement"?

A Yes.

Q And have you seen this before?

A I vaguely recall it, yes.

Q Is that your signature at the bottom?

A Yes.

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Q And paragraph 2 of that agreement states your current obligation as what?

A $96,030.42.

Q Does it indicate what it was incurred for?

A I don't see it on -- do you see it?

Q In paragraph 3?

A Yes.

Q It was for?

A TV production and travel subsistence.

Q And what is the offer that they make to settle the document?

A $9600.

Q So it's roughly?

A 10 cents on the dollar.

Q Not very much, huh? Then the paragraph 5 states that "the initial extension of credit was commercially reasonable and that it being," the vendor being you, presumably, "has taken all commercially reasonable steps to collect the full amount owing." Do you see that?

A Yes.

Q And then the last page of this exhibit, take a moment and read that.

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A I read it.

Q And it is a letter to you from Tim?

A Tim Brown.

Q Who is he?

A My accountant.

Q And apparently he reviewed the debt settlement?

A Apparently so.

Q And does he give you any advice in this letter?

A Yes.

Q What is that?

A The letter says "Hart's debt to Karl Home Video was assumed by you personally when the company was liquidated. Therefore, the agreement should be between Americans With Hart and Stuart Karl. Tax-wise, this results in a loss."

Q Okay. Can you tell me a little what you recall about the circumstances that you settled your debt with Americans With Hart for 10 cents on the dollar?

A Can you be more specific?

Q Obviously it looks like you sent them a bill?

A Yes.

Q And was there any negotiation with anyone

9304353 4457

regarding what was on that bill?

A What I vaguely remember is, they were millions of dollars in debt and I guess they were paying people 10 cents on the dollar from available funds. It is hard for me to recall. I just knew they were in debt.

Q Do you recall when you began to gather the fact that they were in debt?

A I think the general assumption is every political campaign is in debt. That is one thing I sense. Isn't this a fair assumption?

Q Not always.

A If you lived through the Hart campaign you sensed from day 1, from the amount of pressure and stuff they put on you, they were always kind of behind.

Q Is it fair to say the Hart committee sort of ran on a shoestring budget a lot of times?

A I was not privy to how they financed. The general sense is they were always short of money.

Q Always looking for new ways to raise it, presumably? Is that a yes?

A Those are your words. Yes. What do you mean by "new ways to raise it"?

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Q Well --

A Don't all campaigns look for new ways to raise money?

Q Let's go over the billing on the first page, if we could, please, and what I would like to do is turn back to Exhibit 11 from yesterday. On Exhibit 15 the first item is "video production services."

A 16.

Q 16 --

MS. FULTON: This is Exhibit 16.

BY MS. REILLY:

Q I'm sorry, it is. On Exhibit 16 the first item is "video production services for commercials, January 31"?

A Yes.

Q And the amount is?

A 17,000.

Q On Exhibit 11, which is, as you recall from yesterday, was identified as Karl Home Video Services for Hart Campaign 1984, would you read the first item?

A 20/20 film production 5 1-31-84, $17,000.

Q Would this bill that was sent apparently to the

9304353 4459

Hart committee from Karl Home Video refer to that amount?

A Yes.

Q Second item on the invoice, could you read that please.

A "Video production services for commercials, March 1984."

Q And the amount?

A $18,000.

Q Do you see that amount reflected on Exhibit 11?

A Yes.

Q Where is that?

A The third line.

Q And who is identified as the payee on Exhibit 11?

A Raymond Strothers.

Q What about the third entry on the invoice?

A "Video production services for commercials, April 1984."

Q And the amount?

A $25,000.

Q Do you see that reflected on Exhibit 11?

A Yes.

9304353 4460

Q Where is that?

A "Where is that"?

Q Yes, what line?

A 4.

Q And the payee is identified as?

A Raymond Strothers.

Q There is a fourth entry on the invoice. Could you read that, please.

A "Video production services for commercials, May 1984."

Q And the amount?

A $22,000.

Q And do you see that referenced on Exhibit 11?

A Yes.

Q And where do you see that?

A Fifth line.

Q Who is the payee?

A Zimmerman, Galanty.

Q And then the last invoice, last item on the invoice. Could you read that, please.

A "Rally production, May."

Q What does that refer to?

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A I would think the convention.

Q And the amount?

A 13,500 -- excuse me. That was the rally filmed for a commercial. Remember? I mentioned I went to San Francisco to film a commercial. They staged a rally around Union Square that's what that was. And we filmed that.

Q If we were go to here, to the invoice, I mean to the ledger sheet, if I were to tell you expenses for Harman Press, DeFrance Printing and J. McEwen add up to $95,520.42, would those be referring to --

A That appears so.

Q To the rally?

A It looks like it, yes.

Q DeFrance Printing, is that a printer you would normally use?

A I don't know what vendors we normally use. We may or may not. I don't know.

Q Do you know them -- where they are located?

A No.

Q What about Harman Press?

A I don't think -- you know.

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Q Right.

A It is hard for me to say. We may or may not. But I don't know.

Q And --

A The general sense is we didn't use these people.

Q They were selected by the Hart people?

A I sense that.

Q What about J. McEwen for $4000?

A Let me say something. It may not have been the Hart people. It may have been Zimmerman Galanty, if he was staging the event he may have used his vendors. Just like we mentioned earlier, whoever produces the show, they hire their own crew and hire their own production people.

Q So it is not necessarily related to Hart people specifically in terms of selection of vendors; is that correct?

A That is correct. It may have been a selection by the producer. If he was shooting the commercial he may have used those people for it.

Q We have J. McEwen. Do you know who that is?

A No.

Q At this point I will ask you to refer to Exhibit

9304353 4463

15, please. And this was previously identified as amounts expended for Hart activities at the convention. Do you want to take a moment to look at that?

A Yes.

Q The item, 5 items down, Pacific Entertainment?

A Yes.

Q Do you see that?

A Yes.

Q And the amount?

A $1250.

Q Do you see that reflected on Exhibit 11 for services to the Hart campaign?

A Yes.

Q And then the next one going up, 5-31-84 the Harmon Press, do you see that exhibit? Do you see that on Exhibit 11 as services rendered to the Hart campaign?

MS. FULTON: For clarification, are you talking about the second item on Exhibit 15?

MS. REILLY: That is correct.

THE WITNESS: I see one Harman Press for $9000 which we identified earlier and now we are looking for another Harman Press.

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BY MS. REILLY:

Q On Exhibit 11 do you see another entry for the Harman Press?

A Yes.

Q How much is that for?

A $479.

Q Moving up on Exhibit 15?

A Another Harman Press for $228.98.

Q Back to Exhibit 15 entitled "Karl Home Video, Hart activity at convention," third item down, read that entry.

A Audio Visuals, Inc.

Q The amount?

A $450.

Q Do you see that reflected on Exhibit 11?

A Yes.

Q Is it in the same amount?

A Yes.

Q Okay. And DeFrance Printing, do you see that?

A Yes.

Q How much is that?

A $219.90.

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Q Do you see that reflected on Exhibit 11?

A Yes.

Q Okay. So it looks to me -- I'm sorry. And the total amount on Exhibit 11?

A $107,000 -- well, where? Exhibit 11, you go down, which amount?

Q A whole bunch.

A Total charge above.

Q It looks like the first total is for $107,928.90?

A Yes.

Q Then we see a reduction in that amount for $10,000; right?

A Yes.

Q What is the reason given for that?

A It says here "for purchase/leaseback not billable."

Q That referred to the furniture we discussed yesterday?

A Yes.

Q That was leased?

A Yes.

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Q And then "amount billed to Americans With Hart by Karl Home Video." How much is that?

A $2408.48.

Q Actually that is --

A Excuse me, not billable. $95,520.42.

Q Does that match the amount that we saw on Exhibit 16 which is there?

A No -- yes. Yes, it does.

Q Okay. So it looks to me that if I can sort of bring these documents together for you, there was an invoice to the Hart people, it was for $95,520.42, that it is the total amount in Exhibit 11, which is $95,520.42, and that we have gone through and identified certain expenditures making up that total; is that correct?

A Yes.

Q Now, on Exhibit 15, which is "Karl Home Video, Hart activities at convention," we have identified items 1, 2, 3, 4, 5, down to Pacific Entertainment as being on Exhibit 11; is that correct?

A Yes.

Q Do you see on Exhibit 11 any other entries reflecting any other expenses that you incurred at the

9304350 44467

convention?

A Well, let me clarify something here. From my recollection of the documents, from what I am seeing here, it appears everything we talked about is not all convention. What I sense here, everything on Exhibit 15 that says "convention" is wrong.

Not all of this was the convention. A lot of these items was obviously for the rally held the month before. So if you look at the dates of DeFrance Printing on Exhibit 15 on down, a lot of this stuff appears to be the rally.

Q Let me ask the question which is, is there anything on Exhibit 15 which is not related to the Hart campaign?

A Without having all of the backup and all of the invoices and all of the notes, this obviously is somewhat incorrect in the way it is specified. So unless I sat down with every one of the invoices, it is hard to say something may have not slipped in here that is something other than in the Hart campaign. I assume this is all Hart campaign, nothing else in here but Hart's campaign.

Q Rama, was she generally efficient about keeping

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track of the Hart campaign stuff?

A To the best of my knowledge.

Q Okay. Any of the vendors listed on here, on Exhibit 15, do you recognize any of them as being vendors that Karl Home Video would deal with?

A That is hard for me to say. I didn't do the actual -- a lot of times on line purchasing of Scotty's.

Q Let's go through it. We have identified 1 through the first 5 were billed to the Hart campaign according to Exhibit 11?

A Yes.

Q The next item is the Grace Company for posters, care of Hart For President. That would appear to be related to the Hart committee?

A If it says Hart For President, that is a fair assumption.

Q The next item?

A Beachballs, Hart For President.

Q So that's probably Hart for President?

A Yes.

Q The next one?

A Typesetting for Hartbeat Magazine.

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Q Care of Hart For President? So that's probably one?

A Yes.

Q National Screen Print, what about that one?

A Balloons and baseball caps. We always did baseball caps. Every time we release the tape I got a collection of 25.

Q So that might not be one of them?

A It is a general assumption that it is.

Q "More plastic bags"?

A That is hard to say.

Q I think I can refresh your recollection on that one.

A Can you tell me what you are looking for?

Q I believe in Exhibit 15 there is -- maybe it is Exhibit 14, yes, go to Exhibit 14, please.

A Yes.

Q More plastic bags is listed on page 2 of that exhibit.

A Also on here, too, on Exhibit 15.

Q So it appears to be --

A A Hart campaign.

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Q Okay. And the next item which is Wynn Byron for Frisbees. Do you recall the Hart people having Frisbees at the convention?

A No.

Q Is there any documentation --

A The Frisbee would hurt somebody if you threw it at a convention, wouldn't it? It says here on the Keith Glaser stationery.

Q So it is campaign-related. And the T-shirts?

A It is on the Hart notes of Rama's so I'm accounting -- it is the Hart campaign.

Q Item 1, "Warrens L-a-w-l-e-r, Press Care of the Hart For President," would appear to be campaign-related?

A Yes.

Q And the samr for the next item? Kendall Grimm?

A It's on the same piece of paper that has Keith's number on the top, Keith Glaser.

Q "Scotty's pins for delegate pins" would proabaly be Hart-related?

A That is obviously the convention rally.

Q Blake, Moffitt & Town?

A Paper company it says to Keith at Hart. Folders

9304350447 1

to Keith and Hart.

Q And which refers to the tubes and cords entry?

A Yes.

Q And then the last three all indicate they were related to Hart For President. So even though there may be some confusion regarding whether or not they are convention-related, it appears they were related to the Hart committee; is that correct?

A Yes.

Q The question was can you find on Exhibit 11, other than items 1, 2, 3, 4, 5 on Exhibit 15, any of those entries that were billed to the Hart committee?

A Say that again. Can I find --

Q In other words, we have Exhibit 15 which lists certain expenses that were paid for the Hart committee and we have Exhibit 11 which we have shown to be --

A Yes. I think -- can we do this together? Aren't these a couple of these that are not billed?

Q I think there is a lot of them that are not. 1 through 5 are billed?

A And the rest are not.

Q That is my reading, but I want you to be sure

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that is the case.

A Yes. I mean I don't see them billed here and they are stated here as expenditures.

Q And they are not on Exhibit 11?

A That's right.

Q Okay.

A The only thing that I can say is this bill was prepared 7-11-84. A lot of these expenditures -- I mean someone says 7-11-84 and I don't have a date, but somebody, who I have no idea, wrote this says 7-11-84. I noticed all of these on this expenditure coincidentally happened before the convention so maybe there is another invoice.

Q Except that we have a debt settlement which is for $96,000?

A Obviously the other ones were not billed.

Q Right. Whoever paid this for them, their expenses were not subject to the debt settlement; is that correct?

A Yes.

Q Anything else you want to add?

A I am trying to recall. Maybe this is a little

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bit of speculation. By now, the convention was over and there was no more money, so it's like, what's the purpose?

Q Why bother?

A Why bother?

Q Did you have a conversation with anyone associated with the Hart campaign?

A No. I am thinking now --

Q It is sort of money down the drain on your part?

A Maybe I didn't think that then, but looking at this now in hindsight that may have been the case. You are getting $9600 for $96,000 here. And we will bill them for something. What is the purpose? And was there -- the convention is over. It is like the business went out of business.

Q And "business" being the committee?

A The campaign. We don't bill companies after they have gone out of business. It may be on the books somewhere as a debt to us, you know.

Q Let me ask you about the invoice on the top of Exhibit 16. Have you seen it before?

A Like I said, I may have, but I don't recall

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when. I saw it before.

Q Generally if you were sending out an invoice, would you have a date on it somewhere, a typed-in date?

A Yes.

Q And the information such as order date, ship date, and going forward, would that be filled in?

A Yes.

Q Can you explain to me why this isn't?

A I would venture to say if you went through a lot of Karl Home Video records at those points in time there were some that -- I don't think there is a reason why or why not. I think it was just something probably somebody like Rama or somebody else may have compiled this to make an invoice versus our traditional invoice procedure because this was a separate situation.

Q By "separate situation," it wasn't -- running the campaigns and buying stuff for presidential campaigns is not stuff you normally do?

A No. I'm saying it is a video production that we were contracted out for. We're a production company. This is what we did. I'm not saying it was not selling videotapes, which is the main part of the business.

9304350447 5

Q Or paying for printing or --

A We paid for printing all of the time. We had boxes and posters and flyers and baseball caps and Johnny Bench baseball caps.

Q Let me ask you this.

A Standups and flags.

Q On Exhibit 15, the entry to Pacific Entertainment?

A Yes.

Q Can you tell me what that would be for?

A I have no idea. I am assuming it relates somehow. I don't know.

Q What about Audio Visual west? What would that be?

A All I can assume is that maybe it was some broadcast material from the production. If they are filming a rally, Audio Visual West may have provided the speaker and PA system and maybe Pacific Entertainment provided music. It's hard for me to say. Again, when we contract out, by the invoice or the backup, I could tell you specifically what it was.

Q Okay. I will ask you to return to page 3 of

9304354476

Exhibit 16, please. This is --

A On my exhibit it says 4. But it is 005545.

Q Thank you. This is the letter that we think is from Mike Novelli to you, apparently enclosing the debt settlement. In his third sentence, "It would be best for someone besides yourself to be the signator," do you know why he didn't want you to sign the debt settlement?

A No.

Q Do you think he might have been concerned that people would connect you personally with the expenses that were made by the Hart committee made for the Hart committee during the convention period?

A Are you asking me to speculate?

Q That is one of the reasons you think you might have?

A You are asking me to speculate and I cannot speculate on those things.

Q Did you have any conversations with anyone regarding the fact he didn't want you to sign it?

A No, I cannot recall that.

Q You sent it to your accountant; is that correct?

A It says here "Have Tim Brown look at it first

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before sending."

Q In the last page of the exhibit, Tim Brown --

A Looked at it.

Q Right. Did you have any conversations with anyone at the Hart committee regarding the 10 cents on the dollar figure?

A I think Rosen, as I recall.

Q What was that about?

A Send the bill and get some money. In a general sense; I cannot recall specific.

Q Did you know how much money you would get on the dollar?

A I don't recall if I knew it was 10 cents.

Q Did you have an expectation you would be paid less?

A As I said earlier, the general sense was that the campaign was in debt, so you had a good sense you would not get everything that you were owed.

Q Turning to Doug Rosen for a second, we had testimony yesterday regarding a recollection that you had regarding a conversation, maybe in a parking lot regarding the fact that secretaries and law firms were being

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reimbursed for their contributions and that was how it was done, you had a vague sense that it may have happened.

Was anybody else there at that time? Do you remember anybody being there at all?

A I cannot recall. I think I've tried to recall.

Q Was it in your parking lot?

A I sensed it was in the parking lot at my office.

Q I know this may seem a little obnoxious, were you putting Doug into his car? Were you going somewhere?

A Why does that sound obnoxious?

Q Like I am really sort of beating you up on this, but it is really important.

A I am here to answer, if you can beat me up and if I can remember, but you are not being obnoxious. I am trying to remember.

Q Do you remember where you were going?

A Where I was going?

Q Yes.

A I don't remember where I was going. I sensed, as much as I tried as much as I can to remember this, and again it's just a faint recollection. I may have been putting him in his car. That is interesting. I never

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thought about it that.

Q Sort of sending him off good-bye?

A I always did walk him to his car.

Q Why was that?

A "Why was that?" Why do walk people to the car?

Q Did you walk everybody to their cars?

A Probably, because if I didn't get up and walk up out to the car, he would not leave. To be honest, that is a general recollection. This guy is like on me and I am trying to run a business. This old school of how to get someone out. I will help you to your car.

Q Getting back --

A Was there someone else at that meeting?

Q I don't know. Do you recall anyone else being there?

A You asked me that.

Q Do you remember the kind of day it was? Was is raining or snowing?

A I thought it never rained in Southern California. It was probably warm.

Q What kind of car was Rosen driving?

A I think he had a little brown Mercedes

9304335 44480

convertible.

Q Does that jog your memory now putting him into a convertible?

A Obviously it was not raining. I don't know. I know I did walk him out a lot of times to his little brown Mercedes, because the interesting thing about our office, our door opened up, the front door was actually our back door. It opened up right onto where the cars parked. People literally blocked the doors.

Q So it was very easy for you to get up and walk Mr. Rosen to his car?

A Yes. We walked out the front door and there would be the car.

Q You said that on another occasion, the debt settlement occasion, you had a recollection that you called Rosen and --

A Did I say I called him?

Q Talked to him. Did you? Actually, don't let me mischaracterize it, but there was a conversation that if you sent a bill you could get some money; is that correct?

A I think I mentioned he may have said that.

9304335 4481

Q Can you tell me a little bit about what you remember about that?

A That is vaguely what I remember. Again, I don't know if I am like recreating this now in 1990 or if this is the way it happened. As I begin to see all these documents, I begin to remember this. If you asked me if I ever billed the campaign, three hours ago I would probably have said no, until you showed me the bill and then I could remember last couple years of my life, literally. I don't remember a lot of things. It is not that I don't want to.

Q But there was a lot going on?

A A lot of stress; just being sick and all that good stuff. This whole period of time is like -- I don't know -- how you could put it -- gone.

MS. REILLY: Let's take a break.

(Recess.)

MS. REILLY: On the record.

BY MS. REILLY:

Q I have a couple more questions regarding the invoice in Exhibit 16 if you can turn to the first page. Now, we see five entries; right?

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A Yes.

Q And they look like they are from January 3, 1984 through May 1984; is that correct?

A Yes.

Q And it is for "video production services for commercials"?

A Yes.

Q Now what exactly does that mean, "video production services for commercials"?

A Video production services for commercials.

Q Tell me a little bit of what it would entail.

A In essence, I assume the representation is they're hired us to oversee the video production of commercials.

Q Was this a situation of the Hart people calling up and saying, "Help us out, do this, get these commercials together, pay for these commercials"?

A You asked three questions there.

Q You are right. Is this an instance of the Hart people essentially saying "pay for these commercials"?

A I think the fact of the matter is we did pay for the commercials.

9304350 4483

Q But --

A They obviously at their direction said you are in the video production business, so why don't you get involved in this part, this is how you can help the campaign.

Q And by "get involved in this part" and "help the campaign," what were you doing specifically?

A It looks like extending credit for or paying people they could not pay at the time. That comes under the purview of what we do.

Q Anything else that you did regarding the commercials other than extend credit and pay for them?

A I think one of the things we discussed was having Sid Galanty do some of the commercials versus Raymond Strothers, I have had involved with Sid Galanty. I mentioned earlier I used to look at them.

MS. REILLY: Could you read the question back.

(The reporter read the record as requested.)

THE WITNESS: I think I mentioned before, I need to look at them.

BY MS. REILLY:

Q I think you used you did not comment?

9304335 44844

A I didn't remember if I commented.

Q Do you remember now whether or not you commented?

A No. I may have done other things. I don't recall.

Q You don't have any specific recollection of doing anything regarding any of these commercials; is that correct?

A That is correct.

Q Okay.

MS. REILLY: At this time I think we have Exhibit 17.

(Karl Exhibit 17 identified.)

BY MS. REILLY:

Q I hand this to the witness and ask you to look at that, please.

(Pause.)

BY MS. REILLY:

Q Have you had a chance to review this document?

A Yes.

Q Do you recognize it?

A I see it now, yes.

9304335 4485

Q Did you see it at a prior time?

A I must have, but I don't recall when.

Q But it is not unfamiliar to you; is that correct?

A Yes. The only page not familiar to me is the front page. Do you know whose writing that is or what it says?

MS. FULTON: Off the record?

MS. REILLY: Sure.

(Discussion off the record.)

MS. REILLY: On the record.

BY MS. REILLY:

Q While we were off the record, we discussed that page 1 of Exhibit 17 was not part of the original and should not have been part of the document, so we will proceed to what is marked as page 2 of this document. And do you recognize this piece of paper?

A Yes.

Q What is it?

A Memo pad from my desk.

Q The first item, there are 2 entries on it. What is the first one?

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A Redo of dollars.

Q BOA stands for Bank of America?

A Yes.

Q What does that mean, "redo dollars"?

A It looks like I make little notes to myself all day, things I need to address, and I probably had to look at the Bank of America account. And number 2 is send Dixon $5000. I don't think the two are related. I think it was like notes to myself. SK dollars. I make notes of what I wanted to deal with.

Q That is your handwriting?

A Yes.

Q The next page, please, marked as page 3, have you had a chance to read this?

A Yes.

Q Would you describe it for me, please.

A It looks like a letter from Bill Dixon on Gary Hart stationery.

Q It looks like he is introducing himself?

A Yes.

Q This is February 17, 1985?

A Yes.

9304335 44887

Q The second paragraph mentions Jim Barrett?

A Yes.

Q Do you know who he is?

A Yes.

Q Who is he?

A A businessman from the south, from Oklahoma, I think.

Q He was involved with the Hart campaign?

A Yes. He may have been in the Mayflower group on the finance committee. He was someone similar to me, I think.

Q And so you knew him, yes?

A I knew who he was. We knew each other, yes.

Q Mr. Dixon said Jim Barrett told him some good news. Do you recall what the news may be?

A It appears from this that we put him on a retainer for our company.

Q And how is that related to Jim Barrett?

A Jim Barrett called me and asked me if I would do it.

Q Can you tell me a little bit about that conversation? I know it is a long time ago.

9304355 4488

A This one, I had this discussion before. I clearly remember I was in my car on the way back from Los Angeles and the traffic I called on the car phone to talk to Jim Barrett and he mentioned Dixon who they were bringing on to be potentially the campaign manager for 1988 for Hart was going to be working in Hart's office, but I guess the Senate AA salary was only so much and that some other people would help out and hire, possibly because to get him there he had to make up his income. And some other people would get together and have retainer agreements and make him some money and it would allow him to get up to what he was making.

Q Jim Barrett was also going to do a retainer --

A If you look, because it's amusing, you have a Jim Barrett agreement with Bill Dixon. I don't know where that came from. It looks like it is signed by James T. Barrett. I don't remember seeing that one or how I would get that one.

Q There it is.

A Based on that, you know, I think Jim told me he was going to do it.

Q Did he tell you who else was going to do it?

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A Not that I recall.

Q Is it your sense that there were going to be other people doing it, too?

A I don't know.

Q Didn't you think it was a little strange he asked you to do this?

A In hindsight, sitting here in 1990, knowing what I know now, it is probably strange. At the time, I mean it was just another thing I guess you did.

Q And Barrett was doing it, so I guess you thought it was okay?

A And I got a letter from Dixon on Hart's stationery acknowledging it. I guess they were trying to hide something. Dixon is an attorney and Hart is a United States Senator.

Q Right.

A You asked if I thought something was wrong. I don't think this reflects that.

Q The conversation that you had with Barrett, did you decide how much of a fee you would pay to Dixon?

A I think he may have mentioned it, but I don't recall. I think they wanted more and I wanted to give

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less or something.

Q Did you consider this to be sort of another example of them hounding you?

A Yes.

Q Here you are, you've run up and billed them for $96,000 worth of debt at this point that you've billed them for, and we've look at some documents suggesting there was even more money that you had paid out for convention-type activities and you had organized your employees apparently to do some sort of reimbursement, you're out a fair chunk of change already, and then Barrett comes to you and suggests that you invest $10,000 more? Isn't there a part of you that said enough is enough?

A I think you need to put things in perspective. You understand when those original billings were given it was June of 1984. By October of 1984, I had sold my business and had a huge employment contract, couple million dollars in the bank and I was on the way to building a $100 million the company.

So my perspective of $10,000 then and $10,000 in June of '84 was the difference of third grade and than

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being married and looking at a girl, I mean, it was a completely different frame of reference at that point. What I've just experienced was like unfortunately what I thought was the American dream which turned into the America nightmare.

Q But at that time you had a lot of cash so it didn't really matter?

A I don't like to say I was totally irresponsible. But in terms of my perspective on the thing, it was not like I am out this and now this is even more. It was -- I am trying to explain to you a different frame of mind.

Q Did you wonder why Dixon asked you to communicate at his home address as opposed to the Gary Hart offices?

A I don't think I looked at documents that closely.

Q What is "The Freshman Fund"?

A When I sold the company, I was going to get a group of guys and get together, my godfather and bunch of guys, and think of pulling money and investing in little businesses. That is what we call "The Freshman Fund."

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Q Did you do it?

A We had a couple meetings and things got busy and we never did it.

Q So was The Freshman Fund ever incorporated?

A I think it was. I don't know if it was. I am almost certain it was, but I mean again it was like one brief moment, hey, we got this, let's do that.

Q Am I correct it never had any assets, The Freshman Fund?

A Just the initial capitalization, no assets per se. We talked about buying a record store. We had a couple meetings that we were going to buy some things.

Q The initial capitalization, how much would that be?

A I don't know.

Q I mean a $100?

A Couple thousand dollars probably. I cannot recall. I am speculating now.

Q I want to get a perspective of the capitalization.

A I think you cannot clearly have that as a reflection. We thought we were sitting there with a pool

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of lots of money we were going to invest in various projects, and this would be the vehicle to do it.

Q Well, this agreement with Mr. Dixon, it was not really intended for him to give advice to the investment fund, The Freshman Fund?

A If you try to put yourself in a position to carry yourself as now someone who is legitimate because you've sold your company and like a Washington attorney who will look at this, you have a false sense of perceptions. It is not like --

Q Let me ask you, did Mr. Dixon do any work for The Freshman Fund?

A I don't believe so.

Q You didn't send him documents to look over?

A It is hard to remember. I could not tell.

Q Did you ever intend Mr. Dixon would do any work for you?

A We may have initially thought, going back to what we were projecting we could do. I don't --

Q Did you have any conversations with Mr. Dixon about this?

A I don't recall. I don't remember. I really

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don't remember.

Q So you gave him $10,000 total; is that correct?

A I don't recall exactly what it was.

Q According to the agreement that looks like what it would be.

MS. FULTON: Are you referring to a particular page?

MS. REILLY: Page 8.

THE WITNESS: Without seeing it, I could not tell you. I am assuming we have, yes. Page 6, it says "check sent."

BY MS. REILLY:

Q And you didn't have any conversations with him?

A I may have. This is 1985.

Q Did the --

A Now I am getting really busy in 1985. Now it is real busy.

Q You said you had a couple initial meetings with The Freshman Fund?

A Yes.

Q And they were sort of informal-type meetings?

A Yes.

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Q No minutes were taken?

A No.

Q You were sitting around drinking beer?

A I would not say we were drinking beer. That is not a fair characterization.

Q But it was informal?

A Yes. What do you consider "informal"?

Q No minutes, no secretary no one with Roberts' Rules up here waving them.

A No.

Q So in terms of the documents that would relate to The Freshman Fund to be incorporated, you would have articles of incorporation?

A Yes.

Q Is there anything else that you can remember, document-wise, that would have come out of The Freshman Fund?

A Do you have something to refresh my memory?

Q No.

A I don't think so. Maybe. I don't think so.

Q Your recollection is no, you don't think so?

A My recollection is I don't remember. That does

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not mean it was or wasn't. I can't imagine there was. I mean, it was literally a little blip in time. I sensed generally The Freshman Fund, the guys I brought together had one thing in mind; Stuart would invest and they would get a piece. I got that sense. Wait a minute, guys, the idea is we would all invest.

And I got the sense that is not the idea we had, Stuart. I think I wasn't too anxious. So to be honest, I am running a business that is going from 7 to 9 million. The last thing on my mind was spending time with eight guys while they thought I was going to buy them a record store and get 50 percent. It became in the form of more hounders.

Q Did you ever discuss this agreement with Bill Dixon?

A I may have. I may have.

Q I hate to ask the question. Did he ever say thanks for the 10,000 bucks?

A He may have.

Q So really all that this was, I mean, yeah, there was an organization called The Freshman Fund, but it didn't really do anything, although the initial intent was

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they would try to do something, but really the purpose for the payment to Dixon for the $10,000 was to make up his Senate salary; is that correct?

A Maybe I was naive enough to think in those days that if the Freshman Fund worked, we could use Dixon. In hindsight, I began to see a different picture of why this was being done. Being honest with you, I may have been naive enough then to think we're going to use Bill Dixon. We have a Washington attorney. Maybe that was great to walk around and tell my Freshmen Fund buddies, "Aren't I important?" So I mean --

Q Do you know the kind of law Dixon did?

A I thought he was a banking commissioner, so I think it was banking and finance. Assistant banking commissioner, I think, so it would relate to investments. I don't think we sat down and said let's make a corporate decision to hire an attorney. I think it is unfair to say does that mean -- does that mean -- I don't know. The characterization bothers me. It is like you retain an attorney and you settle the case in three days and it is like saying you never intended to use the attorney for three years because you settled the case.

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Q Maybe I was not clear.

A I would have loved to have Freshmen go and Fund invest in things, but it didn't happen. I dated girls sometimes and I would love to have things happen, but it does not happen. I was running a company. I was trying to explain -- clearly in hindsight we are making up the salary.

Q But when Barrett proposed it to you, was it also clear you would be making up his salary?

A He told me. I said that earlier.

Q Not only that, but you were making up the salary and Dixon was coming on and the reason he was coming on is because he was to start running the '88 campaign?

A He would be the guy that potentially could. I don't think it was ever officially said. It was never said, this is the guy, but this campaign needs someone like Bill Dixon to run the campaign. Did Barrett ever use him?

Q I cannot answer.

A I am trying to get a feel as I fill in my view of these things. This has been extremely educational. To find answers or not to find answers.

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Q Anything else you want to tell me about your relationship with Bill Dixon? Let me back up. Did you come to see Bill Dixon more often?

A Not any more -- I mean, a couple times I went to his Senate office, he was there at the convention. He was always around the campaigns in later times. He was in Denver. He always was extremely stressed.

Q How come?

A I don't know. He seemed like a stressed person.

Q Roughly how old was he? Over 50?

A No. 45, 50-ish.

Q Was Dixon involved in 1984 with the Hart people?

A Not that I remember.

Q While we are on the Hart people in 1984, I would like to go through a bunch of names and see who you remember. Sometime maybe in '84.

A This is like a Barbara Walters interview. I will give you a name, and tell me what comes to mind.

Q Okay. We talked a little bit about Billy Shore.

MS. FULTON: Are we in 1984?

MS. REILLY: We're in '84 but we're going to go

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forward. So I am going to go back to '84 starting point and the question refers to people you met from '84 to essentially to date.

BY MS. REILLY:

Q Billy Shore we discussed a little bit. Can you recap it for me?

A Recap what?

Q How you met him.

A I don't remember the exact time I met him, but I was Gary's like administrative assistant.

Q He was the one who you felt was very close to Gary?

A Closest.

Q And Bill Dixon obviously had the letter of introduction you in February 1985. What did he do regarding the campaign?

A He became campaign manager, as I recall.

Q And did he run any of the meetings the Hart people may have had, or was he involved with them?

MS. FULTON: Referring to campaign meetings?

MS. REILLY: Yes.

THE WITNESS: He was there.

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BY MS. REILLY:

Q And --

A I guess he was running them. It is hard to recall exactly.

Q But he was there?

A Yes.

Q And he was big in the Hart campaign?

A Yes.

Q And Mike Novelli --

MS. FULTON: He came on in the --

MS. REILLY: He came on in '85.

BY MS. REILLY:

Q Mike Novelli was involved in the '84 effort. Did that continue?

A He seemed to become more involved in the '88 campaign.

Q You said more involved?

A I sensed his position became more important.

Q He became closer to the top?

A He had more responsibility, I sensed.

Q What about Beth Smith? Is that name familiar?

A Yes.

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Q Who is she?

A A speech writer; did communications.

Q Anything else?

A Press secretary. Press relations.

Q Was she involved in any projects with you?

A Yes.

Q What was that?

A The Hart video project.

Q Any else?

A It may have been. There may have been. Not that I recall. There may have been.

Q Was she with the Senate office or the campaign?

MS. FULTON: Are you talking about a certain point in time?

MS. REILLY: Let me break it up.

BY MS. REILLY:

Q Was she ever with the Senate office that you know?

A She may have been. I vaguely remember that.

Q And did she come to work for the campaign either in '84 or '88?

A I think she moved to Denver.

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Q Did she ever work for any entities that you have done business with?

A We had the video production company for the video, yes.

Q That was what?

A I don't know the name, Complete or Rewind or one of the production companies. I don't know which one.

Q What is Complete Production?

A People we contract out to do the video productions.

Q Do you know who owns it?

A Allison Weir.

Q The mother of --

A Daughter.

Q This is the daughter?

A Yes.

Q Betty is the mother?

A Yes.

Q And Allison owned Complete Productions?

A Yes.

Q And Rewind Productions?

A That was another production company.

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Q Who owned that?

A George U-n-w-i-n.

Q We have seen him as someone whose contribution may have been reimbursed?

A It may or may not.

Q We discussed that yesterday?

A Yes. I think Allison was on the list, also.

Q Kevin Sweeney, he's not. Who is he?

A That is a new name. Kevin Sweeney? That is a familiar name. Why do I know the Kevin Sweeney name? He worked in the Hart offices.

Q Do you recall what he did?

A He must have been in the -- a speech writer in the press office. I am speculating.

Q Obviously -- is he someone that you communicated with regularly?

A He sounds like he is. The name is so familiar to me.

Q Beth Smith, you had a lot of association with her?

A We talked a lot.

Q Okay. Keith Glaser we mentioned a little bit.

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I understand he was involved in the '84 effort; is that correct?

A Yes.

Q And did he continue into the '88 campaign?

A I think for a while. Then I think he went to work for Gephardt. Actually he went to work for a friend of mine before he worked for Gephardt.

Q Who was that?

A I don't know the company's name.

Q Producing?

A No. I don't know what he was doing. I don't know actually what he was doing.

Q Who is the friend?

A Mike Ray, R-a-y.

Q Glaser was someone who apparently knew that you were spending money on Hart activities?

A Yes. If you look at the correspondence --

Q He was pretty clearly involved?

A Yes.

Q And Doug Rosen, of course, we've had a number of conversations regarding he started in '84-83?

A I don't know when he started.

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Q Roughly that time period?

A I had the sense Doug had been involved with Gary way back.

Q "Way back" being the '60s?

A No. His first Senate campaigns.

Q And Doug Rosen is someone we have identified as probably providing you with the sense that it was okay to reimburse your employees for contributions; is that correct?

A That is a fair assumption.

Q After '84, what was your relationship with Rosen? Did it change at all?

A How do you mean?

Q Did you become closer?

A We became closer friends.

Q And I think you mentioned yesterday he started his own production company?

A Yes.

Q Which one was that?

A Visualize.

Q Did you give him a hand starting up?

A What do you mean, "give him a hand"?

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Q Advice.

A I never sat down and gave advice.

Q He was taking copious notes at your office when he was there before during the campaign; is that correct?

A Did I say he was --

Q I was being sarcastic, but he had observed you before in your office?

A Yes. He observed me in my office.

Q So he probably picked up a few pointers?

A I don't know how you can pick up pointers sitting in my office. I don't think he liked watched me work. What do you mean?

Q I guess I meant that he sort of got a flavor for the business from being around you and sort of had a sense of how it operated as a result of --

A What he did and I did was not basically the same, although related. He started a line production post facility house where we sometimes did line produce and hired post production. We were clearly more in the business of distributing and selling the end product, where he didn't do that. His company produced and his facilities provided services for other producers where a

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company like ours would actually sell the product to the consumer.

Q So did you come to use Visualize?

A We hired him to do a number of shows.

Q Can you give me an example?

A I think he did the Silver Fox Show with Richard Simmons, and Richard Simmons did an exercise tape for handicapped children which we felt very good about. He produced that for us and his two partners directed it. I think there may have been some others. I think he may have done some of our commercials, trailer tapes.

It is hard to say. By now I was not necessarily on a regular basis involved with every detail, who got what show and where, an overview and sometimes I did the program.

Q And Doug Wilson?

A I didn't know him that well. He was always in the campaign office or somewhere else.

Q This is in '84?

A I don't remember exactly. I thought he had something to do with finance and then he was in the Senate. I remember seeing him once at the Senate office.

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Q Not someone you would characterize yourself as being close to?

A No.

Q Pudge, Henckel, he was involved in the '84 campaign. What was his job?

A I thought he was campaign manager.

Q And did you have any contact with him after the '84 --

A Not that I recall. I may have.

Q Okay. Now, Henckel, did you have a sense that he knew that you had made certain payments for the convention?

A I don't even remember bumping into him or seeing him at the convention. I may have.

Q What about your subsequent conversations, did you have a sense from that that he knew --

A I don't know that there were subsequent conversations. I have a rough recollection about my interface with him, what it was.

Q Jim Dwinell, he was involved in the '84 campaign. And am I correct, he was someone that you assumed knew that you had made certain expenditures for

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the convention?

A Yes.

Q Did you also have a sense Dwinell knew you had reimbursed employees?

A That gets down to the Rosen-Dwinell thing, and I tried so hard to recall if Dwinell knew or didn't know. In my general sense, people knew. It didn't seem like -- it was not characterized as a secret. I could not say it was something like don't do this. It was like all the secretaries in all of the lawyers' offices do it. The ones that make a little more in your office can do a little more. The ones that make a little less can do a little less.

Q And that was sort of the pattern you used; low-level people gave less and the upper-level people gave a little more?

A Yes. I actually recall a situation -- I thought about it last night -- when one of my employees came and said maybe this is too much, I will give you a smaller check.

Q What did you say?

A Okay.

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Q Who was that employee?

A E.J. Oshins.

Q But she was someone that we said for, at least some of her contributions, she was not reimbursed?

A Yes. She was very politically active in a sense.

Q That was probably an earlier contribution?

A I don't know when it was or wasn't.

Q Is the name Sue Casey familiar to you?

A Yes.

Q Who was she?

A She was something to do -- yes, she became more and more involved in '88 and I think she was there in '84 dealing with finance in the Washington office or something in the Washington office.

Q And then she got more involved?

A Let me characterize something for you. I should probably not just speculate but I always sensed Mr. Rosen tried to deal with me and I always got the sense when other people tried to deal with me, he tried to intercept that and be the guy I dealt with.

Q Why was that, do you think?

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A I don't know. I am just making an observation. I don't want to speculate why or why not.

Q That was very much your sense?

A In hindsight, looking at all of this, yes.

Q Any idea why?

A What do you think? I don't know. Forget it -- I'm sorry.

Q Anyway, Sue Casey, she was in the '84 office in Washington and then what happened?

A What do you mean "what happened"?

Q Did she go on to other levels of the campaign?

A I think she was involved in '88. I think she became -- there was another woman that I am thinking about, too, and I may be confusing her with somebody else.

Q Okay.

A Maybe I am confusing her with someone else.

Q Did you have any conversations with Casey regarding employee reimbursement of subsidizing the campaign?

A You asked two questions.

Q Did you have any conversations with Casey

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regarding employee reimbursement?

A I don't remember.

Q Let's go to the second part which is any conversations with her regarding subsidizing the campaign?

A What do you mean by "subsidizing"?

Q In other words, the money you were paying on behalf the Hart people?

A Like the furniture and stuff?

Q Right, and the convention stuff.

A There may have been a conversation but it is hard to remember.

Q You may have, though?

A I may have. Some reason she sounds familiar to me.

Q Was it maybe when you came to Washington in '84, at the Mayflower event, do you think?

A No.

Q Did you go to the Hart '84, Americans With Hart Washington office?

A Yes.

Q How many times, roughly?

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A I don't remember.

Q Where was it located?

A It was way out somewhere. I'll always remember, you've got get out of the cab and run. I'm a blonde-haired boy from California. Everybody said it is very unsafe. Go right in.

Q You did?

A I did.

Q You had a cab waiting for you when you came out?

A Right.

Q How many times do you remember running into the office?

A I don't recall.

Q More than once?

A Possibly. I don't recall.

Q We discussed Scott Van Hove?

A Yes.

Q He was the person who was involved in the debt settlement; is that correct?

A I saw his name for the first time in the letter here.

Q You don't recall him?

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A I tell you, he is one of the names I have a hard time recalling. Remember, I mentioned I thought he was from San Francisco and now I think he maybe was not from San Francisco. I don't know. I have a hard time remembering him.

Q Richard Wagner?

A Yes.

Q Yes, he was involved in the '84 campaign?

A I don't remember if he was involved in '84 but he was involved later on.

Q Subsequently?

A Yes.

Q What was his role?

A I don't quite know. He did a lot of different things I sensed. I never knew exactly what he did.

Q What did you actually see him doing?

A I don't think I ever saw anybody do anything -- what did I see him doing?

Q Was he on the phone or out raising funds?

A Did I see him on the phone? Did I see him raising funds? I may have seen him on the phone. I may have seen --

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Q Did you meet him fundraising?
A I don't recall.
Q You sensed he did a lot of different-type stuff?
A Yes.
Q Did you have any conversations with him?
A Yes.
Q And that was in D.C.?
A Yes.
Q And what were those conversations about?
A I think he was going to be involved in helping us do the video.
Q Did you talk to him about anything else other than the video?
A In 1990, to try to remember now, I cannot remember.
Q In terms of what you talked about in terms of the video, are we discussing financing?
A I tell you, I don't really remember.
Q Artistic control?
A I don't remember.
Q Was it your sense Wagner knew that you had reimbursed employees for contributions?

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A I don't think that was my sense at all.

Q Did you think he knew that there had been subsidization of campaign expenses by you?

A I don't know. It is hard for me to say. I didn't look at him like that in terms of on the level of a Rosen.

Q So he is a lower-level guy?

A I don't want to say that. I said I didn't have the perception that he wasn't -- he is in his 20's and these other guys were lawyers and --

Q Old?

A Not old, but Wagner was young.

Q Roy Strothers, what about him?

MS. FULTON: For clarification, is that Ray Strothers?

BY MS. REILLY:

Q I am sorry, yes, it's Ray.

A What about him?

Q Was he involved in the Hart campaign at all?

A He did the commercials.

Q Did he do anything else for them?

A He probably advised, aren't those guys political

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advisors in addition to producers? But I don't know.

Q Did you know Strothers before the campaign began?

A I think I said no, not that I recall.

Q Your association with him was based upon the Hart activities?

A To the best of my recollection at this point in time, but again, this is such a gray area for me in trying to remember this.

Q Then we have David Stein. He was apparently active with Hart in California in 1984; is that correct?

A Yes.

Q And was he involved with Hart during '85-86-87?

A Yes.

Q Is he one of the people whose roles became more important?

A I sensed that he wanted to become more important. Again, I don't -- he looked like he was becoming more important, if I had to make an assumption.

BY MS. REILLY: Off the record.

BY MS. REILLY:

Q Back on the record. We were just discussing

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David Stein and I believe you testified it was your impression that he was becoming more important in the Hart organization. It looked to you that was the case, I think you said, and the question is why did you draw that conclusion?

A I think David is very, very sharp, he's very, very intelligent and is very sophisticated, extremely capable when it comes to, my opinion, politics and all his and thoughts and his clearcut stands. And I sensed from having conversations and time spent, I sensed with Gary and he seemed to always be going somewhere, be with Gary. It is just a general feeling that I had. It is hard to say why. It was clearly he wanted to be more involved than he was going to be, I sensed that.

Q Did you have the impression David Stein knew you you would reimburse employees for contributions to the best of your knowledge?

A I couldn't say that he had that impression.

Q Would that answer be also true for the subsidization of the Hart campaign?

A I think he knew I did the further turn because he did the computer.

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Q How do you think he knew that?

A I just sensed that he did. There may have been comments back and forth about I have to go pick up my computer or something and I said how will I get my furniture. David is a very funny individual. He has a tremendous wit I think there may have been something like that said. I thought about that last night.

Q The time that you were both making the jokes, both of you knew it was fairly unlikely you would get your furniture back?

A No, I don't think that was true.

Q Did you think you would get the furniture back eventually?

A I never addressed it like I wasn't. You characterize it like I blew it off and I don't think I ever addressed it, to or not to.

Q The money was sort of gone and the furniture was sort of there and things were sort of happening; is that correct?

A On a list of things that I dealt with it was down at the bottom and I never got to it. It was not like I was blowing it off and I don't think David's impression

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was that he would never see his computer, either.

Q Was he aware of the vendor payments you made for the Hart people?

A How do you mean?

MS. FULTON: Could you refer to specifics?

BY MS. REILLY:

Q Was he aware you made expenditure payments regarding commercials?

A This gets into an area that I am still confused about in terms of what people knew and didn't know.

Q That is one of the things we are trying really hard to flush out.

A May I talk to my counsel?

Q Certainly.

(Pause.)

(Witness consulted with counsel.)

MS. REILLY: Repeat the question, please.

(The reporter read the record as requested.)

BY MS. REILLY:

Q Let me ask you indirectly. Did David Stein -- was he aware of the fact that you had made advances on behalf of the Hart campaign for media purchases?

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A Yes, that is my recollection.

Q What is the basis of that?

A You asked -- I think he knew about -- did he know about it?

Q I guess my question is why do you think he knew?

A It is hard for me to tell you why I think he knew. I mean --

(Witness consults with counsel.)

MS. FULTON: What is the question?

BY MS. REILLY:

Q Why do you think he knew?

MS. FULTON: Yes.

THE WITNESS: At one point during the campaign he wrote a $25,000 check to Karl Video or Karl Productions or one of these deals that I thought was at the behest of Doug Rosen to do that, to pay for some of the production costs or something. Media time or something, now --

MS. REILLY: I think I can help you out with that.

THE WITNESS: Please.

MS. REILLY: Mark this as Exhibit 18.

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(Karl Exhibit 18 identified.)

BY MS. REILLY:

Q I will hand you what has been marked as Exhibit 18 and ask you to look at that and see if it refreshes your recollection.

A Yes.

Q Apparently it does. Could you describe this for me, please.

A It looks like a ledger regarding deposits in and out of the account.

Q By "the account" that would be Karl Productions checking?

A It says "Karl Productions" at the top, yes.

Q It shows money in from David Stein?

A Yes. I thought it was 25 you -- I apologize, but it says 30 here. I still think it is 25, but I mean, I can't recall the exact --

Q The date is May 25, 1984?

A Yes.

Q And then it looks like $30,000 went out a couple days later; is that right?

A Yes.

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Q Where did it go?

A It appears to Zimmerman, Fireman and Gallanty.

Q And you stated the $30,000 was used for what?

A I think it was for media time, as I recall.

Q Okay. So can you tell me a little bit about how David Stein handed you a $30,000 check?

A I don't remember if he handed it to me or somebody picked it up. I don't remember.

Q Did you have discussions regarding the fact he would advance several thousand dollars to you?

A No, but it is interesting.

(Witness consults with counsel.)

THE WITNESS: It is interesting. Sometime later, and I don't remember when, David and I had lunch and he looked at me and said, "When are you going to pay back the $30,000 you owe me?" And I looked at him like, "What do you mean?" He looked at me, "I lent your company money." And I said, "it went to buy media time."

And I sensed he was confused by this and in hindsight I am wondering did Doug Rosen work him, did Doug Rosen or somebody say, "Stuart needs $30,000 and can you lend him the money?"

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Q So like Stuart is on the verge of bankruptcy and can you give him $30,000?

A Those are your words, but --

Q Like you were sort of in need?

A It kind of surprised me. I said, "David" --

Q Did you explore this further with him at lunch?

A No. I was real embarrassed and just confused.

Q When, roughly, was this?

A I don't know.

Q Was it like a couple months -- after the convention?

A Yes. I mean, I don't remember. It could have been a year. It could have been a month. I really don't remember.

Q Did he ever mention the $30,000 again?

A Not that I recall.

Q And did he ever get the money back?

A I don't know.

Q Did he get it back from you, as far as you know?

A I don't think so.

Q So if I understand you right, this went for -- the $30,000 went for the Hart commercials; is that

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correct?

A Yes. That is my understanding you but you have to ask Sid Galanty what he wrote the $30,000 check or if he did write the $30,000 check.

Q I'm sorry, Sid Galanty would write the $30,000 check --

A Well, no, I'm just saying Zimmerman, Galanty. I mean, we wrote a check to them. What they did with it --

Q But they paid for that commercials would be your understanding?

A Yes, I thought this was -- this is right around the June primary when we needed TV time.

Q And --

A $30,000 check shows up, we write a $30,000 check to Galanty that's TV time, I thought.

Q David Stein is a developer?

A Yes.

Q So he does not do any media consultation? That is not his business?

A He probably buys TV time to advertise his developments.

Q Right. But I mean, it is not his line of work?

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A No.

Q I guess what I don't understand is why the $30,000 wasn't included in the bill which you eventually sent to the Hart committee which we previously saw earlier today as Exhibit 16? We went through and figured out where all of the money came from on Exhibit 16.

A That is a good question. I mean I don't know. It is like I am trying figure out why they didn't bill for the rest of the money.

Q So $30,000 David put into this account, it went out to Sid Galanty or Zimmerman Galanty was, presumably spent on Hart media given the proximity of time when the primary --

A The only thing I can only assume is maybe my people didn't think we didn't put the 30 in, we were responsible for billing it. That's all I can think of.

Q Did you discuss that with anybody in your corporation regarding the $30,000?

A I may have discussed it with Dennis Blackburn. I may have had a discussion with Dennis about it.

Q Did Dennis know you were making media advances on behalf of the Hart people?

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A I think he was aware of the fact we were doing this commercial expenditures, yes. Dennis knew pretty much everything that was going on, I mean the company.

Q Employee reimbursements, too?

A He may have been reimbursed.

Q So he knew about that and the media?

A In the sense that what was right or wrong, he had a handle on the business.

Q And also since he was involved with the wire transfers we saw in the previous exhibit he knew about the convention staff, presumably?

A Yes.

MS. REILLY: Let's break for here and come back at 2:00.

(Whereupon, at 12:45 p.m., the deposition was recessed, to be reconvened at 2:00 p.m. this same day.)

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AFTERNOON SESSION (2:00 p.m.)

Whereupon,

GEORGE STUART KARL, JR.

resumed the stand and, having been previously duly sworn, was examined and testified further as follows:

MS. REILLY: On the record.

EXAMINATION (Continued)

BY MS. REILLY:

Q Right before lunch we were discussing certain people in the Hart campaign and I was asking you to identify them, and I would like to continue with that, if we could. Is the name Greg, L-o-u-b-e-l-l, familiar to you?

A No.

Q Not in '84-88?

A Not right now, no.

Q Richard Wagner, we touched upon already. So you can refresh my memory, who is he?

A He did a lot of things. I don't know if he was in the Senate or in the campaign. He seemed to do a lot of things. Hr didn't seem to be anybody of tremendous importance.

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Q He was a lower-level person?

A I sensed that.

Q Chris Thompson, who was he?

A He worked for David Stein, so I think he worked for Stein Brief Company.

Q What was his position?

A I don't know his actual title. I know he worked for David.

Q Was he sort of like a valet?

A I would not consider him a valet.

Q Higher than a valet?

A Yes.

Q Personal assistant, like Rama was to you?

A Oh no, I would not say that. Rama was a secretary per se at first. He was more of an aide, I guess. Maybe he had some other responsibilities. I tell you, I'm not familiar.

Q Did he have any position in the Hart campaign, either in 1984 or 1988?

A He was around the campaign. I don't know if he had an official position or not.

Q When you say "around the campaign" --

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A Usually when David was around, Chris was sometimes around, also.

Q Did you ever see him in a campaign capacity without David being there?

A I don't remember.

Q Betsy Kinney we discussed before, the woman who apparently arranged for some of the transportation during the 1984 convention; is that right?

A Yes, from all of the papers I saw.

Q She is someone aware of the fact that you had made certain expenditures regarding the convention; is that correct?

A Yes.

Q Did she know about your role in providing media to the Hart campaign?

A I don't know.

Q Do you know if she knew that you had provided reimbursed contributions from your employees?

A I don't know.

Q Ely Siegal, who was he?

A He was involved higher up in the campaign. He was a businessman. I don't know his exact title, but he

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was involved.

Q Was he exclusively in California?

A No. He was from Boston, I think, as he was national.

Q Let me ask you a very general question. Yesterday and today we have discussed the fact that there appeared to have been contributions from your employees that were be reimbursed, media expenditures that were made on behalf of the Hart committee, and other advances made by you or your corporation, on behalf of the Hart committee, and I have been trying to identify who in the Hart committee, according to your impressions, would have known this was going on.

Could you just give me a list of those?

A We have picked through some of it already. You could probably go back and refer to the testimony of what I said regarding each individual person.

Q Maybe I should have said the question better. Have I missed anybody? Is there anyone else who would have known?

A I keep waiting for the clock to go off.

Q Please take your time.

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(Pause.)

THE WITNESS: You got Billy Shore, Dixon. There may have been -- I mean those are the names I seem -- unless you can refresh my memory, those are names that came up on a regular basis. I am not saying any one of them knew anything more than the other.

BY MS. REILLY:

Q But we have identified the heavy litters and reached a determination one way or the other as to their involvement; is that correct? I don't want to miss anybody.

A I can imagine that. Now, in the campaign, those were the ones.

Q Who outside of the campaign knew?

A It is hard to say. Knew what? When you sit on the finance committee you assume other people are contributing. I never sat down and compared notes with anybody. I never sat down with Barrett ans compared notes.

Q Right. Did Steve Rivers know?

A He knows.

Q About the subsidization of the Hart campaign?

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A He may have had more of a knowledge just by being around and maybe we discussed it. I don't remember.

Q It is your sense that he did know?

A Yes.

Q And Bernie Schneider?

A Yes. I would think he would know. If I had to make a general assumption, I would say he knew about some of the stuff.

Q Of that, which would you assume he knew about?

A It is hard. I would assume he was involved on David's behalf. I told you I had a meeting in his office with him regarding --

Q The $30,000? I'm sorry.

A Not with Bernie.

Q I was referring to Stein.

A You asked me about Bernie Schneider, and I had a discussion with him about the reimbursement in his office when we started breaking. He knew about the $30,000, I don't know. Did he know about the productions? I don't know. Unless he heard from David.

Q Did I ask you about Jim Barrett?

A Yes. I told you the discussion we had in the

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car regarding Dixon.

Q Let me switch views a little bit.

Were you involved in a video regarding Gary Hart?

A Yes.

Q Can you tell me a little bit about that project?

A Well, it was kind of an evolving project, at one point in time, way back when, at the '84 convention there would be a video version of I guess it was called The New Democracy, which was Gary Hart's book.

Because being that I was in the video publishing business and began to explore doing videos of publications -- obviously Jane had a book on exercise before we did a video on that, and America Health Magazine we were going to do American Health's videos, and subsequently we were going to do Playboy.

The whole issue of this video kind of was like a meandering river. It changed and we paid attention to it. We didn't pay attention to it. It came and it went. Let's do or not do it. It is really, it is like something that is very difficult in my opinion to put your arms

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around. I am trying to give a broad answer to begin with which may help characterize questions that you may have about it, to give you a better framework.

Originally the idea was simply in '84 to do the video version of the book. We would produce it and Gary could use it as a fundraiser. Do the video and people buy it, and that way the campaign gets money.

Q Creative fundraising?

A I don't know if it's creative fundraising -- I don't know, in my view at that point it was a good idea. Creative was new technology.

Q Why did you decide to do it?

A I don't know if we ever did that one. We talked about -- that was at a point where we used to give people advances. So I said, Gary, we will get a $75,000 advance just like he gets a book advance and will do the video version. It is very similar to the book publishing situation. That went away when the campaign ended and there was a lot of talk about -- this is where it is sketchy for me how it all came or went -- and then it's like, let's do a video on Gary.

Even sitting here, I am trying to think about

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how it started or where the script went. The real characterization is I only worried about it when I felt I had to worry about it. I mean like when -- I don't think I -- I mean it was like not always at the top of the list of things I was worried about.

Q You said it started after the convention?

A At the convention.

Q Physically at the convention?

A Physically, that was when there was the book. And I forget, maybe it was Rosen or something, said, well, let's go talk to Gary. And I walked up to Gary and said, you know, would you do a video? Just like my normal pitch I make to celebrities. These are the reasons why. You understand, people would look at me sideways because at that point in the video business it was not what it is today.

In '82 there was 2 million video recorders, and in 1984 there were 10 million video recorders out of 70 million TV homes. Now there are 60 million video recorders and everyone has them. So when I'm talking video in 1984, people are looking at me like "sure, kid, good idea." But you understand that was kind of the tone

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of it, so I don't think anybody took me serious.

Q You don't think who took you serious. Anyone in general?

A I don't think anyone took me serious until October of 1984 when Lorimar bought the company, then all of a sudden people started taking it seriously.

Q You mentioned -- did you spend any money on the video prior to the convention, is the first question?

A How do you mean "spend any money prior"?

Q Did you do any filming, incur production costs?

A I don't think so.

Q Essentially, the idea came up at the convention?

A It may have come up before then. I had a little company doing videos and exploring what does this video business mean. In my opinion, video was going to be in the business for everybody. Kids would learn how to read with video, they would not read books to teach them how to play baseball. They would use video. They wouldn't exercise anymore at health clubs. They'd exercise in front of the TV.

People thought I was crazy. They would get their messages about campaigns from videos. I think the

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DNC and RNC both have videos. So these were unique ideas at the time. So it was logical for me in that position to run down every one of these avenues. I don't think I may have spent money, but I may have written some memos or notes. In terms of hard production costs, not on the New Democracy video, no.

Q Were you interested in doing a video on any other political candidate?

A I think you always think if this worked you can do it for others.

Q Gary was your first choice?

A Yes.

Q You mentioned, I think, you made advances during this time period in --

A No. Traditionally how the business works is you advance the talent. The budget is $150,000, the talent gets 75 and the production gets 75. So that would have been how it would have happened. Our company would have would have advanced the talent or the book rights. You would buy the book rights from Gary for 75,000. The standard rule of thumb was always about $75,000. That's what we would pay. Jane got 75 grand and Simmons got 75

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grand. That was kind of a benchmark of the business at that point.

Q Did they get a piece of the profit?

A You recoup the money and they get an ongoing royalty, after you've recouped the investment.

Q So it is a gamble in terms of buying the book rights?

A Yes. The same gamble the publisher took in publishing the book.

Q How did the project change from being a video on The New Democracy? Can you tell me how the project evolved?

A It is so hard for me -- I mean --

Q There were a lot of scripts, weren't there?

A To characterize it, I was like here and people were coming in and out as the thing evolved and I would respond to them. It was not like I probably never should have -- I never sat down and said let me address myself to this project once and for all. I was more responding than acting on.

MS. REILLY: Why don't we see if we can get this document? I will hand it to the court reporter and ask

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him to mark it, please.

(Karl Exhibit 19 identified.)

BY MS. REILLY:

Q Have you seen that? Have you had a chance to read this document?

A Yes.

Q Is it familiar to you?

A Now it is. I don't remember reading it before, but I read it now, yes.

Q It is addressed to you?

A Yes.

Q The date?

A December 4.

Q 1986?

A Yes.

Q Signed by?

A Doug Rosen.

Q On the Visualized Production stationery?

A Yes.

Q That is the company you started?

A Yes.

Q Describe for us a little bit how the Hart video

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started and meandered, and ultimately what happened to the project?

A I don't think it was ever completed.

Q Why is that?

A I left the video company.

Q It sort of died with you?

A I think so. Died with me.

Q The first paragraph -- second paragraph, it says "Gary perceives of this as your production. He does not know specifically who was doing what. In these cases he usually does not want to know because it involves excessive in-kind type arrangements."

Do you recall reading that before?

A I cannot remember when I read it.

Q But at least Mr. Rosen seems to be concerned about an excessive contribution; would that be correct?

A That is his words, yes.

Q And Beth Smith, she was involved in the video?

A Yes.

Q Would you feel -- would you agree that her performance might not have been up to snuff?

A "Up to snuff" on what? I think --

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Q Actually, I should ask you, what do you think Doug is referring to here?

A I sensed, from what I gathered, Beth Smith was under pressure just from Gary's office in general, not necessarily because of the video. This is a microcosm of an organized -- I mean, my sense of it was, who was going to do the project?

Maybe I was a little paranoid that Doug was going to do the project and I was not going to do the project and that's how I was going to be involved. And this would be a good project. So this is almost like Doug trying to put his arms around me with them. And he will inform me about -- I don't spend time talking to these people and knowing the politics of offices and who is up and who is down and what they about Beth Smith or Gary's feelings about this or that.

This obviously reflects what I was trying to say to you earlier. This was never sat down and said this is what we will try to do and maybe this was his attempt to lock it into some plan. We never buttoned it down as tight as we should in terms of producing the show.

Q Did you discuss -- Mr. Rosen in the last

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paragraph suggesting that you deal directly with Bill Dixon regarding video? Did you deal directly with Bill Dixon on it?

A I don't recall. It does not sound familiar. I don't recall.

Q There was some shooting that went on regarding the video; right?

A Yes.

Q When did that happen?

A Numerous locations. I don't know if we shot in Gary's office or not. We shot at his apartment here in Georgetown -- not Georgetown.

Q Capitol Hill?

A Yes. Somewhere over there. I don't know where I am. Not Georgetown. And the Troublesome Gulch, how apropos.

Q Did you go on any of the shoots?

A Yes.

Q How many of them?

A I was on those that I mentioned.

Q Were there any others?

A Yes. I think, I cannot quite recall, but I

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think the crew may have shot a speech, couple of speeches elsewhere, I am not quite sure, but they may have.

Q Now, who was doing the shooting?

A How do you mean?

Q Who were the people with the cameras?

A I think this crew I had the one I was telling you about there may have been a couple different ones. It is hard for me to remember. I know Doug was on a couple shoots with me. We hired camera people. We hired people to do that. I could not tell you their names.

Q Did you use another company?

A I think at some point Complete Productions, I thought, got involved.

Q In fact, I can introduce this. This might help you out a bit.

MS. REILLY: I'm going to hand it to the court reporter and ask him to mark it, please, as Exhibit 20.

(Karl Exhibit 20 identified.)

BY MS. REILLY:

Q I hand to the witness and his counsel and ask you to take a moment and examine it.

A Yes.

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Q Have you had a chance to examine this document?

A Yes.

Q Do you recognize it?

A How do you mean "recognize it"?

Q Have you seen it before?

A I don't recall seeing it before.

Q This purports to be a schedule, first page headed "Complete Productions, production cost relating to Gary Hart video project," and the second page is another ledger "Dennis Walto, payments received from Complete Productions relating to G. Hart video." And the last page is "Stuart Karl, miscellaneous 1986 check appearing to be Gary Hart-related." You used L.A. Film Works to do some -- actually, tell me what L.A. Film Works did?

A They are like Visualized. They are another outfit. Going back to characterizing, part of this project, it is safe to say, was -- at various times was a for-profit situation in terms of what we would do to produce the video and sell it.

And the way it would work historically, the distributor, being Karl/Lorimar, would sell the tape and we would take a distribution fee and pay our costs to do

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the show and the profits from that after split would go to Gary Hart campaign or whatever it is.

So, basically L.A. Film Works came in to do probably a lot of the actual filming of the thing. You hire a new production outfit, who actually goes and rents the camera and they are the Raymond Strothers, so Complete would have gone out and hired them to do that. Complete didn't have their own equipment.

Q Did you have an interest in Complete Productions?

A Interest?

Q Financial interest?

A Not in a technical point of view. Allison Weir grew up with it and I wanted to see her succeed. She did the back tapes for us. She did a couple of other topics for us. Actually, it's a good tape. Something about sushi.

Q Anything else?

A No.

Q Did you advance L.A. Film Works any money for them to do their work?

A Whose? Who? Who are you referring to? Me

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personally?

Q Or Lorimar.

A We may have. It is hard for me to remember.

Q They would probably would not have done it for free; is that correct?

A That is a fair assumption.

Q McKay Daines, D-a-i-n-e-s, who is he?

A He was somebody who originally came to the Hart campaign independently because he was going to do a video and they said go meet Stuart because he is doing a video and that is how he came into the project. It was like let's go it together and I thought, obviously, he would be active in it.

Q Was he?

A Yes, on and off. This thing meandered and raised its head and then going away, it was off and on. He was active, yes.

Q The schedule also lists an expenditure for archives and money for Good Life Travel and payments to Dennis Walto coming up to $95,948.63, the bottom number.

Did you submit any bills to the Hart campaign for that amount?

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A I don't see why I would. Why I would submit bills to them?

Q For the costs you had incurred.

A If I was producing the show, I would not be submitting bills to them.

Q If you were producing the shows --

A For ourselves to sell as a for-profit deal, I would not be submitting them a bill that I can recall.

Q The ordinary course, would be you would not submit a bill for these costs?

A Exactly.

Q If this was a for-profit situation, as you've described, then under such circumstances, who would front the money for the project? You, personally, or the corporation?

A Most likely the corporation.

Q It would be unusual for you to do it personally; is that correct?

A No.

Q Have you ever taken $95,000 of your own money for a project like this?

A I don't recall.

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Q And you do recall using corporate money in such circumstances; is that correct?

A Yes.

Q Let's try to recapitulate for a second.

Did you have a contract with the Hart people for the video?

A I don't know if there was ever one. There may have been one. There may be letters, but I don't recall.

Q Was there any formal statement of legal rights regarding who owned the rights to the video?

A I don't recall.

Q Is it your impression that at the end of the production when you had a final video that Karl/Lorimar would own it?

A I would probably, at this point in time, 1990, think that would be apropos, but then again, maybe not. You have this hassle all of the time when you are producing videos. They may say we own it but you have a seven-year license to do what you want with it and these are terms. The copyright and the ownership only becomes of function of what you plan to do with it seven, eight or nine years down the line.

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Q If I understand you correctly, there was not a clear consensus regarding ownership; is that correct?

A I don't think there was. I don't recall one.

Q Did you make any payments to Gary Hart for any of the rights that you received to the books that he had written?

A I don't recall. I don't think so.

Q At the beginning it was as I understand it -- it was going to be a video --

A About the book "The New Democracy."

Q As I understand it, wasn't the concept changed?

A For some reason, it didn't happen.

Q The payment of royalties?

A That video.

Q That concept didn't happen?

A Yes.

Q The listing on the exhibit before you, Exhibit 20, is that, to the best of your knowledge, a complete listing of all funds you expended or the corporation expended?

A I have no idea. I can't honestly recall if it was or wasn't.

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Q Does that total cost seem wildly out of sync for costs that you would normally incur for producing a video up to the point that the Hart video stopped?

A Some movies cost 2 million and some cost 30 million. Some videos cost $100,000, some cost $500,000.

Q The cost of a candidate making speeches at various locations would be roughly what?

A That is --

Q Not a fair question?

A That's correct. The Nike commercial cost $400,000 and it's 30 seconds. I can produce for $400,000 a small film. I didn't think it was out of character for the type of money you spend for a video.

Q The payments made to L.A. Film Works, were they, to the best of your knowledge, normal and usual ones, nothing unusual about them?

A Knowing L.A. Film Works, that is probably what the standard fare would be for what they do. They produced a couple other shows for us.

Q What were those?

A How to stop smoking with Larry Hagman.

MS. REILLY: At this point I will hand the court

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reporter Exhibit Number 21.

(Karl Exhibit 21 identified.)

MS. REILLY: I will hand it to the witness and your counsel. Take a moment and review that, please.

(Pause.)

BY MS. REILLY:

Q Have you had a chance to review this document?

A Yes.

Q And are you familiar with it?

A I remember it, yes.

Q And if you could turn to page 4, describe that for us, please.

A It looks like a loan application from the National Bank of Washington.

Q And on the next page, page 5?

A Says the purpose of the loan, installment Loan.

Q To?

A Americans With Hart.

Q The next, on page 6, there is, it looks like, another loan application?

A Yes.

Q Who is it to?

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A Eddie Ferrara.

Q He was an employee of yours?

A Yes.

Q On the last page, page 8 -- I'm sorry. There is another loan application?

A Yes.

Q And who is that to?

A Nick Norton.

Q Who is he?

A Another employee.

Q I'm sorry. Where did he work? What was his job title?

A He was a brand manager.

Q A brand manager?

A Brand manager.

Q On the second page there is a telephone message to Rama from Mr. Rick Ryder --

A Yes.

Q -- regarding the Gary Hart applications. Can you identify Mr. Ryder for us?

A You know, that name is so familiar.

Q Was he a finance person, do you think?

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A I don't know. I am sure as time goes on -- it a very familiar name. It is confusing because I deal with another Ryder right now in my other life, so he had something to do with something, but I cannot tell you what it is.

Q Do you think that something was a loan application?

A I was looking at that. These applications are all dated 9-25 and the letter, the message is, I'm sorry that the birthday --

Q On the second page?

A 8-12. That would be a good assumption, to say they were related to these applications.

Q Can you tell me a little bit about this loan?

A I think this was something that the campaign did where they got people to sign these applications and they financed their contributions and these people would pay monthly.

Q Sort of the ultimate credit card?

A How do you mean that?

Q You make a contribution and they take a little bit every month and you don't miss it?

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A I don't know.

Q On the first page there are some initials?

A Yes.

Q Are those initials familiar to you?

A Yes.

Q CS?

A Court Shannon.

Q Going down?

A Kim, Court was going out with a girl at the time named Kim. Raymond M-i-d-d-e-l. Ed Herrara, John Ludkins, G. Hunt, Nick Norton and Pierre, L-o-u-b-e-t.

Q Were you involved with the loan program?

A In terms of how? Conceiving, creating?

Q Let's start there.

A No.

Q Were you involved with it in terms of offering people the opportunity to loan the campaign money?

A I don't know if I did this or it was sent to Rama and she handed it out. I don't remember being actively involved in this one, that I can recall.

Q Did you make a loan?

A I don't know. I don't think so. I don't think

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so. Is this for volunteers? This was for the new campaign? The date was '86? Had he announced then?

Q Yes. If I can direct your attention to the second page of the loan application itself, page 5, you notice the beneficiary of the loan is listed as Americans With Hart?

A Yes.

Q And that was the '84 committee, as I understand it. So it was, I would think, probably a debt reduction in the program, but maybe you know more about it than I do.

A That is what I understand. I don't know.

Q Did they discuss any sort of thing like this at the financing committee meetings, debt reduction?

A I don't think there was a financing committee meeting that I recall.

Q Wasn't there one at the Mayflower?

A That was the meeting before for -- that was in March of '84.

Q So to be sure I understand, did the finance committee cease operations after the convention?

A The finance committee cease operations? Let me

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give you my opinion of the finance committee. In my opinion, the finance committee, anybody who gave some money got to pretend they were were on the financing committee. You can raise money, you can be on the finance committee. Come to the Mayflower in the ballroom the size of the Astrodome. In terms of the real finance committee, Gary would turn to and say where is my finance committee? I don't know if they disbanded or not.

Q You don't know because you were not on it?

A Yes. I don't know because I was not on it. So in terms what I sense was the ballroom, I can't imagine those people sitting in the same ballroom in 1985 after Gary lost the primary in '84.

Q Did you discuss, to the best of your recollection, these loan applications with any of your employees?

A I may have. I probably did but I don't remember.

Q What about anyone in the campaign?

A You know, I talked to somebody about this and I don't know the extent of it. I mean, again this is starting to be a very busy period of my life. I mean my

9304350455 9

-- I don't mean to say that, to have this comment say that I was being lax, but my focus on the Hart stuff in '85 and '86 was ask me something and I will respond. It was not like thought out as much as I probably should have. If someone says you are doing this, it is like yes. I don't think it was -- I didn't sit down and address this.

(Pause.)

THE WITNESS: I wonder if this or a similar thing, David Stein was involved in, something to do with this.

BY MS. REILLY:

Q Cabinet program?

A Yes. Was it similar to this? It was -- there is something vaguely familiar.

Q Let me be sure I understand. Are you saying, to the best that you can recall, that David Stein might have been involved in this loan program in Exhibit 21? Correct?

A I don't know if it was this one. I vaguely remember -- the cabinet sounds familiar. He mentioned the cabinet.

Q But let me back up a little bit.

9304335 4560

A Is this the cabinet?

Q No, this is a loan program. It is from a Washington bank.

A Do people do these on a regular basis for a campaign? I am asking another question. I'm sorry.

Q Obviously, when we finished up in the convention the Hart people had a lot of debt, and we have seen they went out and reduced some of the debt and tried to raise money to liquidate the debt.

Were you involved with any of the debt liquidation program?

A Just what we discussed.

Q The loan?

A And discounting.

Q Anything else?

A Not that I recall.

Q Do you know if your employees had money deducted or paid money monthly as a result of the loan program papers they signed?

A I don't know.

Q Are you familiar with an individual named Denny Walto?

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A Yes.

Q And how is that?

A He was around a lot.

Q And --

A Involved in many different levels. I mean he worked on the video. He was on my payroll at the office. I got him a car.

Q And he was also involved with the Hart campaign?

A Yes.

Q Let's start in 1984. '83-'84 Did you know Dennis then?

A I don't think so.

Q When did you first meet Dennis?

A I don't remember exactly when I first met Dennis.

MS. REILLY: I will hand to the court reporter Exhibit Number 22 and ask you to mark it, please.

(Karl Exhibit 22 identified.)

BY MS. REILLY:

Q Have you had a chance to examine this document?

A Yes.

Q Have you seen it before?

9304356562

A Yes.

Q And can you describe it?

A It is an agenda for a breakfast meeting on Steven Rivers stationery.

Q The date?

A June 18, 1986.

Q Did you attend breakfast with Mr. Rivers that day?

A I don't know if it was that day, but I assume I had breakfast with Mr. Rivers.

Q Does Mr. Rivers always draw up an agenda for breakfast?

A I don't know.

Q When you had other meals with him --

A I don't recall. I was becoming very busy, so this is probably a way to get through a lot of subjects without meandering.

Q Turn to the second item listed which is Dennis Walto. The first item is scheduled meeting?

A Yes.

Q What was Mr. Rivers' relationship to the hiring of Dennis Walto?

9304356563

A I think he was the one that introduced Walter to my life.

Can I go off the record?

Q Sure.

(Discussion off the record.)

BY MS. REILLY:

Q You stated that Mr. Rivers introduced Dennis Walto into your life. Can you be a little more specific?

A I think he said there is this guy who works for the campaign and a lot of people, between campaigns, look to go to work for companies that have similar things. And maybe Gary wanted to have stuff done and they could do stuff for you, and I said sure, let's talk about the job description.

Q On that day, did you talk about Mr. Walto's job description?

A I don't recall if we did or didn't.

Q You did come to hire Mr. Walto?

A Yes.

Q And when was that, roughly?

A I don't know the date.

Q It would be after June 18, 1986?

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A Yes.

Q And was there a period of time when Mr. Walto was at your office but not on the payroll?

A Maybe. Maybe.

Q Okay.

A I don't know. There may have been a period, but I don't know.

Q But then he ultimately did come on the payroll?

A Yes, I think he was on the Karl/Lorimar payroll.

Q What was he doing for you?

A I think the original thought was that -- originally Dennis said he worked when I met him or talked to on the phone he worked on locations and he was good at organizing the advance men and stuff. And he had worked on some music videos and wanted to get into production and could help organize shoots and stuff like that. You know, okay, that is good.

Then I think the other is because he wanted to still travel and have time to go be with Gary and stuff, so then I think we discussed in addition to video production stuff, the idea of him doing what we call detailing. Detailing is, for example, when the new tape

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is released, you have people that go into video stores and Frito-Lay does this and Pepsi Cola does this and All Brand Products does this. Where you detail stores, you make sure your posters are in the window or your Frito box is prominently displayed.

I think -- and I don't know if he ever did this or not because I think I read some conflicting things. I said go talk to the guys downstairs and let them know where you are going and give them detailed reports. By now we had close to 200 employees and I sensed he took advantage of me, didn't really do that. Maybe I was talking to him and he was saying, okay, I am hearing you but thinking I really just here to travel with Gary Hart and I am thinking maybe he would do -- I am doing 1990 speculation and I should probably stop.

Q Did you hire Dennis Walto with the expectation he would do work for Karl/Lorimar?

A Some, yes.

Q But he would not be a full-time employee?

A I sensed at times he would do for Gary stuff, having the ability to go out.

Q Was it your understanding that when he had to go

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and do things for Gary that he would remain on the payroll?

A Let me properly characterize this. I never totally addressed myself to him one way or the other, so for you to sit down and ask me if I had this impression or that impression, I never sat down and came to any formal conclusions as much as I should have.

I am quite sure I shirked my responsibility by not doing that by addressing, what is this arrangement. I didn't pay as much attention as I should.

Q You discussed it with Mr. Rivers?

A Yes.

Q Anybody else?

A I don't know. Probably.

Q And do you know who that would be?

A I may have mentioned it to Gary Hunt, to have Dennis go to the sales guys, Rob Bonham, that handled the sales guys and detailing guys. I may have mentioned it to him.

Q So there were people at Lorimar whose job it was to go out and do detail work?

A Yes, we had detail work. Yes.

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Q Were they based in California or sort of across the country?

A We had an office in Dallas and in Chicago and New York.

Q So they would be based there?

A Yes. Now, detailing fell into a general description. We had a detail in Southern California, and that is all she did. Sales guys would detail in addition. Sometimes we would hire detail forces. When you do a big promotion you would hire detail forces. It was not something totally foreign to our business.

MS. REILLY: I will hand this to the court reporter and ask him to mark it, please, as Exhibit 23.

(Karl Exhibit 23 identified.)

BY MS. REILLY:

Q Have you read the document?

A Never a dull moment.

Q Have you had a chance to read this document?

A Yes.

Q Do you recognize it?

A Now I do, yes.

Q The date stamped at the bottom, "received July

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7, 1986, Stuart Karl," that would be you?

A Last time I checked.

Q The letter is addressed to you from Bill Shore?

A Yes.

Q Stating, "What a great difference it made to have Dennis Walto at the scene of a major event. Great idea on your part. Continued thanks for all your assistance."

Can you explain this letter?

A It looks like a thank you letter.

Q But it also says "great idea on your part." Can you explain that?

A It sounds like someone clearly wants to make this my suggestion.

Q And any idea who that someone would be?

A Obviously Billy Shore.

Q But who would have told Billy Shore about the Walto situation?

A Probably Steven Rivers.

Q Anyone else could have done it?

A I don't know. I don't recall.

Q Did David Stein know about it?

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A David Stein know Dennis Walto? I don't think so.

Q How about Bernie Schneider?

A I don't know. He may have. I know he started to get more and more involved in the campaign, Bernie did, in a major way. To the extent when Gary ran the second or third time, he traveled with him a lot and did some press interface. This may have been too early for that but -- it seems to me too early.

I know at the end, I mean Walto traveled with Bernie and Gary and Steven Rivers. There was a clip of them getting off the plane to go into the debate. I was shocked. I didn't know Steven was traveling with them. I saw him on TV with Walto and Gary.

Q So Rivers clearly knew about the employment situation?

A Yes.

Q And Bill Shore, reading from this letter, apparently has an idea of what is going on?

A Yes.

Q Anyone else that you discussed with it?

A Discussed the employment situation?

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Q Of Dennis Walto?

A I mean people knew he worked in our office. He was on the floor with eight other or 10 other people.

Q He has his own office?

A No. He was in a cubicle. No one had offices. We had cubicles.

Q At Karl/Lorimar were there yearly evaluations of employees?

A You understand systems when you go from this size to this size, I would love to say yes, we had yearly evaluations. But when you grow as fast as we grow, we may have. Lorimar may have. There may be a policy manual, but we were too new. We probably did. Maybe we didn't. I don't recall.

Q So Dennis comes on the payroll and what does he do?

A It is hard for me to tell you specifically. I didn't interface with him on a duty level on a daily basis.

Q Was he, his cubicle near your office?

A The same floor.

Q So would you be likely to see him on a daily

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basis?

A If I was there and he was there, I would see him.

Q And he was out on the road a lot; right?

A From -- I don't know. He had a schedule. It sounds like from what I read after the fact, he probably was.

Q You didn't know that at the time?

A I don't recall.

Q You went looking for Dennis?

A No, I had no need, with regard to my responsibilities give me Dennis Walto.

Q Whose responsibility was Dennis Walto?

A This is where it is confusing. I would like to have thought it was the guys in the sales department checking on him and from -- I think from what I read after the fact he never went down and did that or someone said they didn't do that. I thought he did do that.

Q So there was Dennis without any work to do?

A I am not saying that, or else he didn't attempt to do any work. There was always plenty of work to do. If you avoided it, then you had no work to do. Again, it

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is two people have a different understanding of a situation.

MS. REILLY: I will ask the reporter to mark this as Exhibit 24.

(Karl Exhibit 24 identified.)

BY MS. REILLY:

Q I ask you to take a moment and examine this document, please.

(Pause.)

BY MS. REILLY:

Q Have you had a chance to examine this document?

A Yes.

Q Do you recall receiving this document?

A No, but I got it. That's my scribbling at the top.

Q You scribbled to the left?

A Yes. "To file."

Q Directing your attention, please, to the second paragraph which states, "It was great to see you in Denver last weekend along with Steve and Dennis who are rapidly becoming indispensable to the Hart operation."

Do you see that?

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A Yes.

Q And the bottom, Bill Shore is the sender?

A Yes.

Q When Bill Shore is writing you this letter, telling you Steven Dennis is becoming rapidly indispensable to the Hart operation, did it occur to you to check on what Dennis was doing?

A I obviously, I think I mentioned before, sensed he was always gone with the Hart people, doing things.

Q Right. Did you have an impression he was doing any work for Karl/Lorimar at all during this period?

A I don't know. I never addressed myself to that.

Q Did he file any reports regarding the detailing?

A That is a question I was asked before. I thought he was supposed to but I don't think he ever did. Or he may have, once or twice. Maybe once or twice. Some people said he never did. He obviously was not doing much for Karl/Lorimar.

Q He was doing a lot of Hart stuff?

A It appears so.

Q You knew that?

A Yes.

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Q And the Hart people knew it, too?

A Yes.

Q And --

A Billy Shore knew it.

Q Who else knew it?

A Obviously Gary knew it if he was as much with Gary as I heard he was.

Q Anyone else?

A I don't know. It is hard to say.

Q Did you ever discuss it with Gary, the fact that you had given him this advance person?

A I don't think so like that.

Q Or that Dennis was working for you?

A I don't think I ever -- no. I mean no, we don't have discussions like that.

Q Were you paying for Steve Rivers to go on the travel, too?

A Was I paying Steve Rivers to go on travel? I don't know how he got paid. I know he got some money from us and he was being paid some money from the Fonda camp. I don't know how he -- unless you have something to refresh my memory, I don't know how he was reimbursed.

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When you own a big corporation, people are always putting things in for reimbursement.

Q You said Steve was getting money from Karl/Lorimar. Was that for the political stuff he was doing with Gary Hart?

A No. I think he was truly doing all our Fonda press, interfacing and things of that nature with Jane and the press. And stuff for me, too; press for me, too. I think he helped me out with the press in terms of articles and stuff and interfacing with our other PR firm at the same time.

Q Who is the other PR firm?

A Bender Communications.

Q You said Steve was getting money from the Fonda people as well?

A I think he did some consulting for them, too.

Q That was related to what work he was legitimately performing?

A Yes.

Q But he did a lot of political work as well; Steve?

A What do you mean by that?

9304350457 6

Q I think you mentioned he was traveling with Gary.

A I said there is a time he seemed to be traveling with Gary. I didn't track these people. I could not sit there and tell you if I -- you are asking me where they were and were not.

Q But whether or not you knew where Denny Walto was, you knew he was out doing Gary Hart's stuff, even though you don't know exactly where he was on a given day?

A Yes.

Q He would report in to you occasionally?

A I think he called me. I don't know if I ever took the calls but I know he called me a lot. I vaguely remember a lot of Walto calls.

Q And the Walto calls we are discussing --

A I said I don't know if I took them or not. I can't remember any of the calls.

Q But the telephone logs would seem to indicate that?

A Yes.

Q And when Dennis called in, I guess it is fair to say he was not talking about Karl/Lorimar business; is

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that correct?

A I don't know.

Q Given the fact he was not doing any work for you at the time?

A We have yet to totally establish that he was not doing work for me at the time.

Q I think we have pretty well established that he was not doing much; is that true?

A You may have established it. In my mind I have not established that.

Q Let's back up for a second.

A I want to be clear. I am not totally 100 percent comfortable he was not doing any work for Karl/Lorimar.

Q Was he doing -- it is possible what you are saying is he may have done a little work?

A It is possible he may have done a little.

Q Is it possible he may have done a lot?

A It is possible he may have represented and given me the feeling that he was doing work for Karl/Lorimar but never did the work for Karl/Lorimar. That's what I'm trying to say.

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Q But you knew --

A I may have been naive enough to think all that was true.

Q But you knew for a fact he was doing Hart stuff during this period?

A What is "Hart stuff," traveling with Hart, doing events?

Q Yes.

A Yes.

MS. REILLY: Let me hand to the court reporter and ask him to mark this, please, as Exhibit 25.

(Karl Exhibit 25 identified.)

BY MS. REILLY:

Q I hand this to the witness and ask you to take moment and examine that, please.

(Pause.)

BY MS. REILLY:

Q Have you had a chance to examine this document?

A Yes.

Q Do you recognize it?

A No. I don't remember this one.

Q Okay. This purports to be a memo to Stuart

9304350457 9

Karl, Bill Dixon and Billy Shore from Dennis Walto regarding Chicago-Buffalo-New Orleans assessment dated August 15, 1986. It discusses Gary Hart's recent speaking engagements and apparently discusses Dennis Walto's assessment regarding the timing of the campaign.

Did you regularly receive memos like this from Dennis?

A I may have, but I don't remember. I got a lot of mail.

Q Did you have anyone else on your payroll who was going to work for Gary at the time?

A I think we have established Walto and Steven.

Q So a memo from someone doing political work while on your payroll is a little different from the ordinary mail you would have gotten during that period; right?

A Yes.

Q And did you discuss this memo with Bill Dixon or Billy Shore?

A No.

Q Did you ever discuss the fact that Dennis Walto was on your payroll with Bill Dixon?

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A Not that I remember.

Q What about Billy Shore?

A I may have discussed it with Billy Shore.

Q Is it likely you discussed it with Billy Shore?

A It is hard for me to say. I don't remember.

Q From the exhibits, we have Billy writes and thanks you for your assistance regarding assistance.

A He may have heard that from Steven. Whether he and I directly conversed about it, I don't recall a conversation.

Q Did you talk to Bill Dixon regarding --

A You asked that, and I said I don't remember.

Q How long did Dennis Walto stay on your payroll?

A I don't know.

Q Was there a period of time when he went off your payroll?

A I don't know.

Q Did you ever pay him any money personally?

A I think I recall paying him some money personally.

Q When Denny was out on the road was he sunmitting reimbursement requests?

9304350458 1

A Yes. What a coincidence. You just happen to have it.

MS. REILLY: I will hand to the court reporter and ask you to mark this, please, as Exhibit 26.

(Karl Exhibit 26 identified.)

BY MS. REILLY:

Q Have you had a chance to examine this document?

A Yes.

Q Do you recognize it?

A It is an expense report form.

Q Entitled "Karl/Lorimar Home Video Employee Expense Report"?

A Yes.

Q Is that the form Karl/Lorimar used during this period of time, July of '86?

A Yes, I believe so.

Q And it indicates that Dennis Walto sought reimbursement for $203.37?

A Yes.

Q Would Dennis regularly submit these?

A I think he did on a regular basis.

Q Did Dennis also work on the video?

9304358452

A Yes.

Q And what did he do regarding the video?

A Getting back to the video, it could have been one of six different roles, helping us set it up, working on location -- it is hard for me to say specifically what he did or didn't do.

Q But it would not have been in his area of expertise, would it?

A What he represented to me originally was his expertise.

MS. REILLY: I will hand to the reporter the next exhibit.

(Karl Exhibit 27 identified.)

MS. REILLY: I will ask to you take moment and examine that document, please.

(Pause.)

THE WITNESS: I examined it.

BY MS. REILLY:

Q Based upon your examination of this document, do you believe that you paid Dennis Walto from your personal checking account $8,714.92?

A That is what it says here.

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Q And the total was for $9,657.75?

A Yes.

Q Those were amounts that you paid to Dennis Walto, based upon examination of this document; is that correct?

A Yes.

MS. REILLY: Mark this as Exhibit 28, please.

(Karl Exhibit 28 identified.)

BY MS. REILLY:

Q Can you --

A Let me make it clear; I don't remember any of these things, but I'm obviously referring to seeing it now.

Q And refreshing your recollection?

A Yes.

Q I will ask you to take a moment and examine this document, please.

(Pause.)

BY MS. REILLY:

Q Have you had a chance to examine this document?

A Yes.

Q Do you recognize it?

9304350458 4

A Yes.

Q Could you describe it for us, please.

A A letter from Dennis Walto to me.

Q And it seems to be thanking you for your assistance?

A Yes.

Q And the second sentence, "I hope things that CH are going well." That was the company you were with then?

A Cooper Hamilton.

Q I'm sorry, what is Cooper Hamilton?

A It has been a corporation for a long time.

Q Were you and Dennis Walto friends?

A Not like in the sense I was friends with Doug Rosen. Different generations.

Q Have you seen him recently?

A No.

Q Have you seen him since '88?

A On TV.

Q Anywhere else?

A No, not that I remember.

Q Do you have anything you want to add regarding Walto?

9304350458585

A No.

Q The only other question I have is, you testified that you had given Dennis a lease on a car?

A Yes.

Q And his reference there to the fact he appreciates you keeping the lease on the Chevy going, that would refer to his car that he had?

A Yes.

Q How long did Dennis maintain use of the car?

A I don't recall.

Q Was it for a year?

A I don't recall.

Q Six months?

A Probably could not have been, but three, four, five months after this at the maximum.

Q And --

A I don't know.

Q When Denny was at the office I presume he had access to all of the things in your office, such as the telephone, the fax machine, Xerox machine; is that correct?

A As much as anybody else.

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Q He was treated like everyone else in terms of his access?

A Yes.

Q Did you have a policy doing political work in the office?

A Did we have a policy on anything? I don't know.

Q Because there was political work going on in the office; is that correct? Rama, for example, doing convention arrangements?

A The guy downstairs calling for his wife who is selling Girl Scout cookies. That is a pretty interesting characterization.

Q My point is --

A 200 employees in a company and two people that, Rama is collecting, doing this, and Dennis Walto -- I mean, is that political? It sounds like there is this whole machine down there. We were not doing videos, but we were doing political work.

Q I didn't mean to imply that you had devoted the entire resource of the corporation to do that but there did seem it be a certain level of political activity?

A What level would that be? Two people out of

9304350458587

200-some-odd? My secretary? David's secretary makes campaign contributions for an event, is his office doing a political work?

MS. FULTON: Can we take a little break?

MS. REILLY: Yes.

(Recess.)

MS. REILLY: On the record.

I will hand to the court reporter the latest exhibit and ask him to mark it, please.

(Karl Exhibit 29 identified.)

MS. REILLY: I will ask the witness to take a moment and examine this document.

(Pause.)

BY MS. REILLY:

Q Have you had a chance to examine this document?

A Yes.

Q Do you recall this document?

A I do. Yes.

Q And can you describe it for us?

A It is a postcard from Russia with love.

Q From --

A This is a walk down memory lane.

9304335 4588

Q Tell me a little bit what you remember about this Russian postcard.

A I got it.

Q And it was from?

A Steven Rivers.

Q Anybody else?

A It looks like Bill Dixon signed this one and so did Doug Wilson. It's like two different cards.

Q I would like to direct your attention, please, to the second page of this document. I ask you to examine that one, please.

A Okay.

Q You have?

A Yes.

Q And do you recognize this document?

A I don't remember getting it.

Q Is that your name stamped on the top?

A Yes.

Q And it is addressed to you?

A Yes.

Q Dated October 21, 1986?

A Correct.

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Q From Doug Wilson?

A Correct.

Q I would like to ask you, please, to look at the third paragraph which states, "Stuart, I also wanted to take this opportunity for a long overdue thanks for enabling" --

A I get another thanks.

Q -- "Steve Rivers to come with me to Moscow. He is terrific and made the trip much more enjoyable for Bill Dixon and me."

I am going to you, please, to turn to the page marked 00065. There is a memo there addressed to you?

A Yes.

Q With your date stamp on it?

A Yes.

Q And Steven Rivers' name appears on the bottom?

A Yes.

Q Asking for reimbursement for his hotel for the Moscow trip?

A Yes.

Q Did you arrange for Mr. Rivers to go to Moscow?

A I think I paid for it. It is obvious from these

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documents.

Q Why did you do that?

A I don't know. I don't Remember.

Q What was --

A He probably asked me and I said sure, go.

Q What was Mr. Rivers doing in Moscow with Bill Dixon of Gary Hart's staff and Doug Wilson of Gary Hart's staff?

A I don't remember. I could not tell you if you asked me to tell you what they were doing there.

Q Do you recall the circumstances of arranging for Mr. Rivers to go?

A How do you mean "the circumstances"?

Q Did he come to you or call you up and ask you if you would do it?

A Probably.

Q Or did someone from the Hart committee or the Hart Senate office call you up?

A Steve would probably do it, I would think. I think probably more Steve would probably do it than Doug.

Q And have you ever paid for Steve Rivers to go on a trip before?

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A Probably.

Q And when would that be?

A He did a lot of traveling for us. I mean personal appearances, I think, other things.

Q Did you pay for any of his travel regarding the Hart campaign?

A I don't remember.

Q Is it possible that you did?

A It is possible. I don't remember this.

Q Have you, during this time period which is October 1986, did you have any business interest in the Soviet Union?

A No.

Q So he was not there on business for you; is that correct?

A That is correct.

Q And he went there with two persons on Gary's staff; is that correct?

A If you are telling me Doug Wilson was officially on the staff, I guess he was. And that would be correct.

Q And Doug Wilson wrote and thanked you for letting Steve Rivers come along; is that correct?

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A Yes.

Q Wasn't this really a political trip for Gary Hart, the Moscow trip?

A I don't remember why Gary went to Moscow. He is a United States Senator. That is a pretty good assumption this was not a pleasure trip.

Q I want to clarify that the exhibit indicates Doug Wilson and -- Doug Wilson and Bill Dixon went to Moscow and not the Senator, right, at least on this trip, based on these documents?

A Without Gary?

Q Yes. That is my understanding of the exhibit. Unless you know something that we don't; right? Do you have a recollection of Gary Hart going to Moscow?

A I just assumed he went. Why would they be going? Again, I don't remember much about it.

Q But in any event, based upon your refreshed recollection, it appears that you paid for Steve Rivers to make this trip?

A It appears that way, yes.

Q My only other question, which is flipping back, did you ever bill the Hart campaign for months that you

9304350459 3

paid either from the corporation or from your personal checking account?

A I don't remember.

Q Regarding Dennis Walto?

A I don't remember.

Q Could you have?

A I don't know. I don't remember.

MS. REILLY: I will hand to the court reporter the next exhibit and ask you to mark it.

(Karl Exhibit 30 identified.)

BY MS. REILLY:

Q I will ask the witness to examine this document, please.

A Okay.

Q Have you examined this document?

A Yes.

Q Do you recognize it?

A Yes.

Q And what is it?

A Looks like an invitation to a retreat.

Q To your knowledge, when did Gary Hart's campaign for the '88 Presidential nomination begin?

9304335 45994

A I couldn't tell you. I don't remember.

Q This meeting that you went to in 1985, this retreat, I will ask you to please look at the agenda at page 5. It appears to be a bunch of meetings there?

A Yes.

Q Did you go to those meetings?

A None of them.

Q None of them?

A No.

Q What were you doing instead?

A I was playing with my little baby.

Q So you didn't attend any of the meetings?

A I went to the western cookout and entertainment on Saturday night and I went to the boat ride on Sunday.

Q And did you discuss with anyone who attended those meetings what went on?

A No.

Q Were you --

A Maybe Rosen, but I didn't remember discussing anything.

Q Was Gary Hart there?

A Yes.

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Q Did you speak with him?

A Cursory level. Saturdays are my days at home.

Q This was one in California?

A Yes. This was like 30 minutes from my house.

Q So -- I'm sorry. You went to the western cookout and that was it?

A And the boat ride on Sunday.

Q Was that on your boat?

A Yes.

Q And what was the name of your boat?

A The Oz.

Q When you were at the western cookout, did you have any discussions with anyone regarding Gary Hart's Presidential bid?

A No. We got there late and everybody was eating. I think my wife was pregnant. When was this? She was. She was as big -- she had a baby in July.

Q So you had no political discussions with anybody?

A I don't remember. No. It was more listening to music and stories. No political discussions that I recall.

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Q Was Dennis Walto there?

A I don't remember.

Q Who from the Hart campaign do you remember being there?

A Oh, man. I would love to say Dixon was there but I can't remember.

Q Rosen was there, I take it?

A Yes. He and I had discussion. Stein was there because obviously he had something to do with the ranch. It was a friend of his. We got there late. People were sitting around eating ribs, which I hated eating ribs in front of other people.

Q And on the boat ride, did Gary Hart go on your boat?

A Yes.

Q Did you have any discussions with him?

A No.

Q Were you driving?

A No.

Q Hosting?

A I guess you could say that.

Q Were any contributions solicited at this

9304350459 7

gathering?

A Not that I recall.

Q And the last page of this document, page 7, might refresh your recollection regarding who was there. Martha Keys. Do you know who she is?

A Yes.

Q Who is she?

A I think she is Gary's sister-in-law, isn't she?

Q What else did she do?

A She ran the Center for New Democracy; is that correct?

Q There is an organization with that name.

A I think she ran that.

Q Did you make a contribution to that organization?

A Yes.

Q When was that?

A I don't remember.

Q Do you remember how much it was?

A Not unless you can refresh my memory. I know it was more than a thousand dollars.

Q And did she become part of the group of people

9304350459 8

who were hounding you?

A I don't think she ever did directly. I think that was more Steve Rivers hounding on her behalf.

Q On who else's behalf did Steve Rivers hound you?

A It is not a fair characterization to say he hounded, per se. He was in my life because he was there, so it was not like it was out of nowhere hounding. Like he would prod me.

Q I am unclear. Did Steve Rivers work out of your office?

A No.

Q He had his own office?

A Yes.

Q I'm sorry, why did you contribute to the Center for New Democracy?

A I was probably asked to.

Q And Steve Rivers asked you to contribute to a lot of people; is that correct?

A I don't know if you can characterize it as asked me. Maybe like why don't you and this would be a good one.

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Q Was he sort of your mentor in terms of political contributions?

A He was more informed.

Q He would be a good barometer in terms of what would be good candidates to contribute to?

A Yes.

MS. REILLY: I hand the reporter this document and ask him to mark it as Exhibit 31.

(Karl Exhibit 31 identified.)

MS. REILLY: I will ask the witness to please examine this document.

(Pause.)

BY MS. REILLY:

Q Did you have a chance to examine this document?

A Yes.

Q Do you recognize it?

A Yes.

Q Could you describe it for us, please?

A An invitation for an event.

Q What event was that?

A It says Derby Week.

Q Did you and your wife go to the Derby weekend?

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A Yes.

Q When was that?

A In May of 1985.

Q And was Gary Hart there?

A Yes.

Q And was Lee Hart there?

A Yes.

Q And Doug Rosen?

A Yes.

Q Is he married?

A No.

Q Was he there, also?

A Yes.

Q And what was your purpose for attending the Derby?

A Doug Rosen's horse was the favorite to win the Derby. So I knew they were doing this but I went there at the behest of, not as a political fundraising thing but to see Doug's horse win the Kentucky Derby.

Q Did you see his horse win the Derby?

A No. He came in third. We left quick.

Q While you were there and Gary Hart was there,

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did you have occasion to discuss financing of campaigns with him?

A Not that I recall, no. No.

Q You are sure?

A I've heard people say we did; I don't remember.

MS. REILLY: Let me introduce as the next exhibit a newspaper article.

(Karl Exhibit 32 identified.)

MS. REILLY: I will ask the witness to please examine this document.

(Pause.)

BY MS. REILLY:

Q Have you had a chance to examine this document?

A Yes.

Q Have you seen it before?

A I remember reading it at the time.

Q So you have seen it before?

A Yes.

Q I ask you to direct your attention to the third page and to the area that has been highlighted in yellow at the top.

A Yes.

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Q It states -- actually, why don't you move to the previous page and begin with the paragraph -- this is discussing the Kentucky Derby and the fact there was a conversation held, according to the news article, to raise money to repay '84 debts. The newspaper article states, "The conversation took place, the source said, following a post-race party in which Rosen entertained Hart and his wife, Lee, and Karl and wife, Debra. Again, the question focused on questionable fundraising, how to get the most out of Stuart and his friends without anybody knowing it, the source said."

Mr. Karl, can you explain --

A Off the record.

MS. REILLY: Sure. Off the record, please.

(Discussion off the record.)

BY MS. REILLY:

Q Can you explain this?

A As I recall, I had a pregnant wife. I was taking Mrs. Rosen back to the West Coast to California. The mood was not one of jubilation after their favorite horse who -- they wanted us to win because Doug Rosen's father just died and this was his horse because he was the

9304350460 3

chief and this was Chief's Crown, I cannot -- maybe there was, but in my memory there was no mood or frame of mind in anybody's eyes to talk about campaign financing at a post-race party.

If I recall, it was like, let's get out of town, I remember the minute the race was over, and people were getting picked up and getting the Rosen family out of there. This was a very distraught moment for this family. Politics did not enter into it. And all I can recall and I don't know if it was that night or the next morning, but I remember we went to a little reception at the hotel. It was like the family felt uncomfortable because the family was in mourning, their horse just lost, and I remember David Stein, of all things, in my opinion, made probably the biggest public -- what's the term, a gaffe, faux pas -- thanking Rosen's family and they looked at him, like "leave us alone." And I said to my wife, "Let's get out of here."

I don't remember being with Lee and Gary after this or having conversations and discussions on fundraising, how to get most of the Stuart and his friends without anybody knowing?

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Q It seems pretty clear, as far as you recall, it didn't happen after the race?

A Or before the race, having discussions like that with anybody. I mean, you know, my impression is a lot of these articles are, you know, did you know this is what they were doing, here it is, whenever this was. What is the date on this article? January of '88. Let me tell you about the campaign laws. Okay, now tell us about this meeting. Oh, I will be famous for five minutes. Let me give you my impression and speculation. We don't have to verify any facts. Let's just type it here. We don't have to tell you who your name is.

Q So it is your impression that the article is not accurate?

A There is a tremendous amount of inaccuracies with comments like this in the article.

Q Just so I'm clear, did you have any conversations with Gary Hart at the Derby?

A I don't think I saw much of the Derby. In fact, I bet you I didn't see -- I think we went to dinner. I don't even know if he was at the dinner.

Q Was it a big dinner?

9304350460 5

A Actually we had dinner in the governor's dining room because we were late. Everybody else was out under the tent and we got -- it was quite plain. I don't know if he was there or not. I really don't -- I'm really somewhat in awe of this whole thing.

Q How about Anita Madden's party in Lexington, did you go there?

A Yes.

MS. FULTON: Are you referring to a particular document?

THE WITNESS: In the agenda, yes. I went to the party.

BY MS. REILLY:

Q Did you hear any political discussion there?

A There were probably 3000 people there with volcanoes and dancers six bands and 200,000 free shrimp.

Q I understand it was an opulent party?

A Yes.

Q And the agenda document we're referring to is in Exhibit 31?

A It was probably the most singular opulent party in the history of mankind next to a fight in Vegas.

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Believe me, my mind was not thinking politics at this point. I went to this thing -- I think what I understand -- Douglas trying to promote to other people coming to this thing as a Derby, weekend as a fundraiser. I never went under those auspices.

MS. REILLY: Let's move to the next exhibit, please. I will hand to the court reporter the next exhibit, and mark this as Exhibit 33, please.

(Karl Exhibit 33 identified.)

BY MS. REILLY:

Q Incidentally, how did you get to the Derby?

A I flew.

Q Charter?

A Yes.

Q And how did you arrange for the charter?

A Probably called the charter company I did business with and said I need a plane, or my secretary or somebody did it.

Q You were using one agency at that time; is that correct?

A Yes.

Q What company was that?

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A Martin Aviation.

Q Your other travel, who did that? Was there an agency for that?

A Good Life, at that time.

(Pause.)

BY MS. REILLY:

Q Have you had a chance to examine this document?

A Yes.

Q And do you recognize it?

A Yes, vaguely. Yes.

Q And could you describe for us, please, the first two pages?

A Yes. A letter from Gary.

Q Addressed to?

A Me, asking me to do report of some kind for him.

Q And the letter is dated October 17, 1985; is that correct?

A That was my son's third birthday.

Q And it notes that "a planned weekend in Colorado with 10 to 12 trusted friends and advisors to discuss ideas about the management and structure and organization of a future and national political effort." Then it asks

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you to put your thoughts down on paper.

Did you?

A It appears I did, yes.

Q And in fact if you look at the third page of the document it looks like Bill Shore wrote to you and confirmed you were going to come to this Colorado event?

A Yes.

Q Did you go?

A Yes.

Q At the time you got this letter, this is your son's third birthday, October 17, 1985. Did you have a sense that Gary Hart was going to run in '88?

A A clear sense, yes.

Q Why was it clear?

A I don't know. I just had that feeling.

Q Did you discuss it --

A Did you think in 1985 he was going to continue to run after losing -- I'm sorry. Yes, I understand.

Q Was it based upon your interaction with the Hart people?

A I don't know. You just assumed he had won 30 some odd states in '84. You know the Democrats and he was

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running -- it was just an assumption.

Q Of course, you had paid Bill Dixon $10,000 as a retainer to stay on in the Senate office and then probably come and run Hart's campaign.

A You start putting that together, it gives you a good assumption that he is going to run again.

Q Was there anything else that would lead you to conclude he was going to run again?

A I am sure there are 20 or 30 different things. Articles you read. Stories you heard.

Q Retreats he was having?

A Retreats he was having.

Q Anything else? Did you have any discussions with him, regarding 1988?

A Not that I remember.

Q But you did with Doug Rosen, yes, regarding Gary's Presidential ambitions in '88?

A Yes.

Q Is it your impression Doug Rosen also believed Gary was running?

A Yes.

Q I'm going to phrase this next question a little

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differently. Did you talk to anybody associated with the Hart campaign or Hart Senate office who gave you the impression that Gary was not going to run?

A There may have been some discussions, maybe this is not the right time. There may have been those discussions at times. So maybe it is accurate to say as probably there was a fair amount of discussion maybe he should not run.

Q At least it was your impression he was going to run?

A Yes.

Q Did you discuss Gary Hart's plans with Gary personally during this time?

A I had an opportunity at Winter Park to, yes -- plans to run or not?

Q Yes.

A Oh, no.

Q Did you happen to see Gary Hart much in the period from October '85 through, say, the end of 1986, fairly often?

A I don't remember.

Q Did you see him at all during that period?

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A I may have.

Q Did you have lunch with him?

A I may have. I don't know my schedule. You asked me to remember what I did in a three-month period of time five years ago.

Q Actually it is a 15-month period, 1985 and all of 1986.

A That is even harder to remember.

Q That is easy because you have a bigger period of time. Did you come to D.C. at all?

A I think I may have, yes.

Q When you came to D.C., did you see him, Gary Hart?

A Probably. Like I mentioned, I had lunch with him once at the Senate -- I don't know what that period of time was. Sitting here, right now, I couldn't "opinion" a date.

Q When you came to Washington would you always call Gary's office to see if he was available?

A No.

Q Why was that?

A That wasn't my style.

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Q Were you waiting for Gary to call you?

A No. I just didn't do it. There were times I came in and didn't call him.

Q But there were times clearly when you came in and did?

A No. I cannot imagine showing up in town and calling Gary's office. It's just not me. I never positioned myself as feeling like I needed to hang around or hang on. In fact, I probably made a big point of not being one of those type of people. I planned to be not one of these people, hey, I am in town, I'm a junkie and can I come to your office? I went out of my way not to do it.

Q When you came to town, would you call any of his staff?

A I didn't call hardly anybody. I would usually go places for a reason so if I came here to see Gary Hart. I came here to see Gary Hart and conduct whatever other business I would have or fly up to New York and come down. What are you trying to get at and I'll answer it for you.

Q Let me ask it this way.

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A Get to the point. Your questions -- I don't know what you are trying to ask me.

Q Essentially trying to probe your interaction with Gary during this period --

A It is a fair characterization to say we had a very non -- it was not necessarily a deep relationship. It was cursory at best. We didn't sit down and say let's talk political issues. I mean clearly it was not the tone of our relationship.

Q It as more sort of, if I can characterize it correctly, hello, good-bye, thank you?

A Yes. And how is it going?

Q You mentioned yesterday you had dinner with Gary and another couple and you and your wife in Laguna Beach at one point and the topic was Minnesota Farms, Montana Farms.

Did you have, at any time, other dinners or luncheons with Gary where it was a small group sitting around like that?

A You mean over the course of five years?

Q Yes. All I'm really trying to do is get a sense how often you would be with him in that sort of

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situation.

A Rarely.

Q Three or four times maybe?

A Yes. Five times maybe, maybe six, seven times.

Q Less than 10?

A Yes. I mean, yes. It was not -- like I said, I was not one of those people that I felt I needed to hang around Gary to feel important. I think I had a different view. I didn't want to feel like I had to be handled, we have to do a dinner with this guy and that guy.

Q Or he won't give us any more money. Is that what you didn't want to happen, so that they would have to treat you a certain way?

A I never related it -- even the people I deal with in business, I never felt I had to go to their house or take their time.

Q Tell me a little about the Winter Park retreat.

A What would you like to know?

Q Who was there?

A A bunch of people. Do you have a list somewhere.

Q I believe I do.

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MS. REILLY: I will have the court reporter mark this as Exhibit 34, please.

(Karl Exhibit 34 identified.)

MS. REILLY: I will ask the witness to please take a moment and examine this.

(Pause.)

BY MS. REILLY:

Q Have you had a chance to look at this document?

A Yes.

Q Do you recognize it?

A Yes. Agenda for the Winter Park retreat.

Q The date was February 20, 1986 through February 23rd?

A Yes.

Q You stated you went to this?

A Yes.

Q And how did you get there?

A I flew.

Q And did you go commercial or charter?

A Charter.

Q And anybody go with you on the plane to Winter Park?

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A It is hard for me to remember.

Q How about Dave Stein?

A Did he fly with me on that? I don't know if he flew with me then. I usually remember when David flies with me.

Q Why is that?

A Because he is so funny. He's Great. A very entertaining individual.

Q What about Bernie Schneider? Did he go?

A To the Winter Park meeting, I don't think he did.

Q Okay. I would like to ask you to please take a peek at the agenda. It looks like there are, on Friday, there are meetings and work sessions in the morning and in the afternoon. Same deal on Saturday; meeting and work sessions.

Did you go to any of those?

A Yes.

Q What were they about?

A I think generally -- it is hard for me to remember.

Q Try real hard.

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A I think they took -- each of the members of the group were divided into different areas, communication, delegates, political issues, and I think then different groups broke up to be responsible to give their feelings on those different areas of the campaign and I think people got up -- I remember got up to the board and gave different opinions of how to do things and not do things.

It is a general how much I know about a management session by a lot of guys who think they know a lot about management. And so you -- I mean general issues about how to run things and who is responsible. I don't think it is signing anything but a general feeling of what you people think about all these political issues.

Q And I guess at one point you discussed how to run things in a campaign?

A Yes.

Q And the focus was a national campaign?

A Yes.

Q And the focus was Gary Hart's '88 national campaign?

A Yes.

Q Were they discussing anything else there, any

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national campaign and how to run it or how not to run it? Anything else?

A You said that.

Q I mean with the management types.

A I don't remember it. That is the problem. I remember sitting around in awe of a lot of guys sounding like they knew what they were talking about. A lot of stuff I had no idea what they were talking about. The theories I knew about was what I felt, was my opinion of how a guy should present himself. Initially, that is what I discussed. Interviews, major events.

Q And Gary was there, right?

A Yes.

Q I see Bill Dixon's name there.

A Yes.

Q And was Dan, I'm not sure how to say it so I'll spell his last name, C-a-l-a-g-a-r-i, Calagari there?

A The name does not sounds familiar.

Q How about Kevin Sweeney, was he there?

A I have a hard time placing Kevin Sweeney, if he is a tall guy with dark hair?

Q I don't know. I've never met him.

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A The difference between Kevin -- now I know who he is. He was the press secretary. I don't know if he was there. He and Beth Smith worked together. Now I know who Kevin Sweeney is.

Q What about David Lane?

A I don't remember David Lane.

Q Matthew, R-e-u-t-e-r?

A Maybe. There was a lot of guys there. I don't know.

Q Chris Philips?

A I don't remember.

Q Weston Frank?

A Yes. I remember Weston Frank. I don't know if he was there or not, but I sure remember Weston Frank.

Q Tell us about him.

A He is one of those guys, I didn't understand a thing he talked about. He's one of the guys who sits and talks and I'm going, either it's me or him.

Q How about Carla Reese?

A I don't remember.

Q Beth Smith?

A I don't remember your guys' names.

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Q You must remember my name.

A I remember yours but I cannot tell you your name or your name. Don't take that personally. I cannot tell you your name right now. I have been in this room for two hours, two days -- I can't even remember how long I've been here, so don't take that personally. I know I stayed with Ely Siegal with him and his wife in the condo -- at least I can tell you that one -- and his daughter and Hogan was there, cause he's got white hair and you can't forget him.

Q Who is Hogan?

A Mark Hogan -- Tom Hogan.

Q Is he a Hart person?

A Yes.

Q Involved?

A Yes. No. Hogan is another guy. There was a guy who was the ex-lieutenant governor, was there, too. Hogue?

Q Well --

A Do you have a list?

Q I read it.

A Somewhere I am sure there is a list of people

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that were there. There is a photo, a big group shot.

Q Now that we have sort of located who Kevin Sweeney is, did he know that employees had been reimbursed for their contributions?

A I don't think he was involved in '84. I think he came on in '87-88. I don't remember him being involved.

Q Okay. So we are clear. It is your impression that the Winter Park retreat was essentially geared to figuring out how to run the '88 campaign and how to do it; is that correct?

A Yes.

MS. REILLY: I hand this to the reporter, and mark this as Exhibit 35, please.

(Karl Exhibit 35 identified.)

MS. REILLY:

Q Have you had a chance to examine this document?

A Yes.

Q Do you recognize it?

A Yes.

Q And can you tell me what it refers to?

A A meeting of coordinators in Colorado that is

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going to take place.

Q When was it going to take place?

A July 11 through 13th.

Q And the front page is a request from Richard Wagner to help cover the bar?

A It looks like that, yes.

Q Stratton & Associates, are you familiar with that organization?

A Now I am. Mike Stratton, I think that was his name, I guess did things like this. They hired him to do things like this.

Q So he was hired by the Hart campaign?

A I think so.

Q Do you know what his exact line of work was?

A No.

Q And did you attend this meeting?

A Yes.

Q Did you already tell me how you got there?

A No.

Q How did you get there?

A By plane.

Q Charter?

9304350462 3

A Probably.

Q Martin Aviation?

A Probably.

Q I will ask you a couple questions about the retreat itself. Return to the agenda, which is page 1354 through 1356. Again this the same sort of situation where we see sort of working meetings regarding political strategy and compiance and fundraising, apparently.

Did you go to those meetings?

A I went to one of these big ones, yes.

Q Do you recall what was discussed there?

A Not really. I just remember the room with a lot of people. I can't remember exactly.

Q And were they discussing Gary Hart's Presidential prospects for 1988?

A If you had to ask me, I would probably say yes. I think, yes.

Q This was a fairly big meeting?

A Yes.

Q Bigger than ones you were at previously?

A I'd only been to that one retreat, and that was that dinner, if you recall, so this was a full-blown --

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maybe there were other meetings.

Q You went to the Winter Park one?

A Yes.

Q And then the part of the dinner at --

A At the ranch.

Q Okay. I will ask you to turn to what is marked as 1355 on the next page.

A Yes.

Q Go to the 2:30 to 3:00 meeting. There is a mention of something called the volunteer committee?

A Yes.

Q Can you tell me what that is?

A I think I don't know. Maybe that became a working title for the campaign, or people. It rings a bell. I think volunteers started showing up in a lot of places, as I recall. But I cannot tell you specifically right now what it was. I don't remember as we speak.

Q Were you a member the volunteer committee?

A I probably could be a member of any committee I wanted at that point. Maybe I was.

Q Did you go to brunch at Troublesome Gulch?

MS. FULTON: Are you referring to something on

9304335 46625

this document?

MS. REILLY: The next page over.

THE WITNESS: I don't know if we did or didn't. That may have been canceled. I don't remember going to Troublesome Gulch then. Maybe we did.

BY MS. REILLY:

Q Okay.

A I may have left. I don't remember.

Q There were a lot of people there, so if you went to Troublesome Gulch with a lot of people --

A That is why it does not ring true. That is not a place for a lot of people. Maybe we did.

Q But you have no recollection of going?

A No.

Q The usual suspects of the Hart committee were there?

A I don't think that is a very nice characterization.

Q No, it's not. Were the usual people from the Hart committee were there?

A Yes.

Q Was Mike Novelli there?

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A I don't remember. Probably.

Q Bill Dixon's name is on here, and Greg LaBell is there?

A I still don't know who that is.

Q Did you talk to Gary at all during this time frame?

A This one?

Q Yes.

A Probably not. Maybe. I don't think so.

Q And why don't you think so?

A Usually in big groups I didn't get too close to him. I am the type who likes to sit in the back of the classroom.

Q Roughly how many people were there?

A I've got to believe -- if this is the one meeting I am thinking it had to be, at least 50 to 100 people in it.

Q This is the one in Denver you mentioned earlier?

A Yes.

Q Did you go to all of the meetings that were scheduled?

A I doubt it.

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Q And you do remember going to at least one?

A Yes, the big one.

Q Did you go to any others?

A I don't remember.

Q But you do remember discussions there regarding the 1988 campaign; is that correct?

A It is hard for me to specifically tell you what was discussed.

Q You are talking about debt reduction there?

A They may have. I see that here.

Q But I was wondering if they followed the agenda, is what I am saying.

A It is hard to remember.

Q You recall the volunteer committee --

A The name keeps showing up.

Q So you may have gotten mail from them?

A Probably. I may be sounding evasive but I am telling you as much as I remember.

Q I suspect you are tired?

A I am probably feeling better now.

MS. REILLY: I will hand to the court reporter this document and ask him to mark this as Exhibit 36.

9304355 4628

(Karl Exhibit 36 identified.)

MS. REILLY: I will ask the witness to please examine this document.

THE WITNESS: Yes.

(Pause.)

BY MS. REILLY:

Q Okay?

A I didn't go to this.

Q Did you have a chance to examine the document?

A Yes.

Q And it is your testimony you did not attend the Wisconsin retreat on July 18?

A No, I didn't.

Q Did you talk to anybody who went?

A Not that I remember.

Q Do you know if David Stein went?

A I don't remember.

Q Steve Rivers? Did you go to any of these with Steve Rivers?

A Steve Rivers go to any of these? He may have.

Q Probably to the one in California at Dave Stein's, do you think?

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A I don't think so. That was in '86. I think he was just getting to know them then. I don't remember if he was at that one.

MS. REILLY: I hand this to the reporter and ask him to mark this as Exhibit 37.

(Karl Exhibit 37 identified.)

BY MS. REILLY:

Q I will ask you to please examine this document.

A Yes. Yes, I read it.

Q Do you recognize it?

A Yes.

Q Could you describe it for us.

A A letter from the Hart national cabinet.

Q Do you know who put this up?

A Monarch Beach address leads me to believe it is David Stein because that is -- he developed, Monarch Beach.

Q Did he develop the Hart national capital cabinet?

A I think so.

Q That was a program to reduce debt, apparently?

A I have not read the letter closely, but is that

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what it says?

Q Yes, the second paragraph, "the Hart national cabinet and our membership have the specific goal" --

A Yes.

Q -- "of retiring the 1984 debt before the end of 1986." Were you a member of the Hart national cabinet?

A I don't know, but I am sure if I wanted to be, I could have been. I don't remember.

Q At the end they have the Silver Hart Club and the Golden Hart Club?

A For some reason I don't think this ever happened.

Q Why is that?

A I don't know. I for some reason I don't believe this ever happened. I vaguely remember for some reason this not happening.

Q By "not happening," could that be tied to the fact they didn't get very much money in the end to pay off their debt?

A No. Maybe this program just didn't work.

Q Did you ever discuss it with David Stein?

A Not that I recall.

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Q Or discuss it with anyone else?

A No. I am sure if someone got this in my office I may have discussed it with people in my offices. Are these the ones the people did for the banks? Are they different from the ones you showed me earlier? They are both the same bank.

Q I think they are different. I think there is a loan application and then a national cabinet membership application.

A This is a loan application.

MS. REILLY: I'm sorry, the exhibit appears to be incorrectly put together. Off the record.

(Discussion off the record.)

MS. REILLY: Mark these documents. Back on the record.

(Karl Exhibits 37 and 37-A identified.)

BY MS. REILLY:

Q While off the record it was discussed that the third page of Exhibit 37 appears not to relate to that document, and so we have marked as Exhibit 37-A what appears to be an application to the Hart national cabinet membership application which apparently should follow that

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document and, if you notice, 37-A refers to Pierre Loubet, who I believe was an employee of yours?

A Was.

Q He apparently filled out an application to become a member of the Monarch Beach -- to a Monarch Beach address?

A Yes.

Q Did you ever discuss this with Mr. Loubet?

A I don't remember.

Q If I am correct, you would have no recollection regarding the Hart national cabinet?

A I believe I mentioned before I vaguely remember it but I cannot give you any specifics about it. I don't know.

Q So I am clear and the volunteer committee other than ringing a bell --

A If you show me more information, all this stuff runs together in my mind.

Q Did you actually have a title at any time with the Hart organization?

A I saw a piece of paper that said I was finance something or another.

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Q Anything else?

A Not that I do recall. Maybe. The finance chair was for Orange County. But I was never privy to any overall financial things.

Q So if I can sort of draw together your testimony over the last two days, it would be that you didn't consider yourself to be a high-ranking person of the Hart organization. Is that correct -- I mean, is that true?

A I -- perception and reality are sometimes interesting. I mean, maybe I would like to carry myself that I had a little more importance to other people but in reality I sensed I was not that important in the scheme of things.

MS. REILLY: I am going to turn the questions over to Jonathan Bernstein, who is going to do a little questioning.

EXAMINATION

BY MR. BERNSTEIN:

Q Mr. Karl, what we have left are some questions about one area we have not touched on in the last few days in the area of transportation. And this relates to chartered airplane and helicopter flights that were

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apparently paid for by you and/or your company, involving Gary Hart and some other political candidates.

Let me ask you first, during 1984, did you have occasion to use charter air transportation?

A Most likely, yes.

Q For what purposes?

A Probably combination of business or pleasure.

Q What kind of business?

A Going to meetings, accounts -- business. We sold to 30 distributors in 100 different locations. We had meetings in New York, Chicago, various places.

Q Was that true in early 1984 as well?

A Yes.

Q You stated earlier that the charter company that you used was Martin Aviation; is that right?

A That's one of them, yes.

Q What other ones?

A Sky Bird Aviation at times. There may have been another one I don't recall. At some point, I didn't deal with who they called.

Q What kind of aircraft did you charter?

A All kinds.

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Q Can you list for me the different kinds?

A There is another charter company. I'm going to get this one.

(Pause.)

THE WITNESS: It is in Oregon. Aircraft At Your Call.

BY MR. BERNSTEIN:

Q I think the question was what -- can you list the different types of aircraft that you chartered?

A Sometimes Lear jets, Cessna Citation jets, Falcon jets, Gulf Stream jets, West Wind jets. In fact, coming out of West Wind is another name a company that had the West Wind there was another name for that one and they were based in northern California, CP Air, CP National. Maybe that is the name. I don't recall. Two and four seater helicopters, maybe an odd turbo prop here and there. This is going to look horrible in the deposition. I don't know.

Q Could you briefly describe what the procedure was when the need arose for a charter aircraft?

A Using --

MS. FULTON: Are you still talking about 1984?

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MR. BERNSTEIN: Yes.

THE WITNESS: I would turn to someone, Rama, Abraham or Elizabeth, and say I need to go somewhere and give them this kind of plane or I would call and get this kind of plane and it would be there and the schedule set.

BY MR. BERNSTEIN:

Q Did you decide on the type of plane?

A I don't remember. Maybe. Sometimes. Sometimes maybe not. I don't know.

Q Would that vary by the number of people you wanted to transport?

A Yes. Sometimes. Sometimes it was more comfortable in a certain plane in particular. I hate to fly, so once I got to know one or two of the planes, I became more comfortable.

Q How were the charters paid for?

A Periodically on my American Express card. Before I sold the company it was American Express or a company check. I don't recall each instance.

Q Was it mixed?

A I would think it would be. It is hard to recall now.

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Q Did you indicate to the charter company when you ordered the plane whether it would be paid for by personal funds or by the company?

A I don't think I was doing the all ordering.

Q Is that part of the instructions you would give to whoever it was that did order?

A It would seem to be, but I don't remember.

Q During 1984, did you travel to any political events on chartered aircraft?

A I went to the campaign. Was that in 1984, the convention? I went ot the convention in a chartered plane.

Q What kind of plane was that? Do you remember?

A What kind of plane was that? That may have been a West Wind.

Q How many passengers does a West Wind have room for?

A Six to eight.

Q Was that the night before the convention?

A I don't remember. My schedule would show.

Q And who else was on the plane with you?

A It is hard to say. Probably my wife.

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Q Who else?

A I don't recall. Maybe Court Shannon. I know I had a meeting with Court in San Francisco regarding business, but I don't know if he flew up with us or if he flew up later.

Q Was there anybody political on the plane with you?

A Going up to San Francisco?

Q Yes.

A To the convention?

Q Yes.

A I don't remember. I am sure they have flight logs to tell you who was on the plane.

Q I will show you a flight log in a minute.

A It would help my memory. I was doing a lot of flying on weekly basis with the strangest hours of the day and night. Sometimes I would get on the plane and fall asleep.

Q You said this was the first national political convention that you have been to in July 1984?

A Yes.

Q Was that the entire purpose of your trip up?

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A I think -- I had business meetings with Court Shannon when I was there. So I was doing business up there. Primarily it was to go to the convention.

Q Were there other people on the plane who were going to the convention with you?

A I am trying to remember, but I can't. There may have been.

Q Was Gary Hart on the plane with you?

A No.

Q Are you certain?

A There was another trip Gary Hart was on the plane, if that is what you are getting to, but not to the convention.

Q More than one trip?

A Yes, but not going to the convention in California.

Q Was Donna Rice on the plane with you?

A Are you kidding? No.

Q I am exploring the universe of possibilities.

A No.

Q Can you remember who else, anybody else?

A Somewhere in that period of time Patricia Duff

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was her name at that time, was on the West Wind and I don't know if it was going up or coming back, but she was on one of the legs.

Q Who is Patricia Duff?

A Someone who worked on the campaign. She coordinated the star appearances and subsequently married Mike M-e-d-e-a-v-o-y.

Q Who is Mike Medeavoy?

A Chairman of Tristar Pictures.

Q Was he involved in the Hart campaign?

A I think he was kind of a contributor and was around the campaign a lot.

Q Was Patricia Duff someone you dealt with or were familiar with from the campaign?

A No. I met her around this time.

Q So you think she might have been on the plane but you're not sure?

A I am almost certain she did one of the legs with us. She is one of the types you would remember if Patricia Duff was on the airplane. I mean she is right up there she's a wonderful woman.

Q Do you remember if it was on the way to the

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convention?

A I don't remember. It is hard for me to imagine her coming to Orange County -- it may have been on the way back. I know she is on the airplane. I literally remember looking across at her on the airplane. I am almost certain she was on one of those legs.

Q And so that was one instance in 1984 when you flew up to the convention. What other political events can you remember that, in 1984, that involved the use of the chartered aircraft?

A It is hard for me to say. Obviously I flew chartered airplanes the majority of the time in 1984, '85 and '86 and early '87. That was more the way I got around. So when I went to Winter Park or went to Washington or flew to the Mayflower, I mean I went on a chartered airplane. When I went to the Mayflower event, I told you we landed in the snow in a Lear 35 and I was scared to death.

Q The first incident was the one in March of 1984 at the Mayflower, the first event?

A Yes.

Q Let me ask it a different way. You described

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during the course of the days a number of different people that you had involvement with in the campaign, people who had some involvement in the Hart campaign, or you worked with or talked to or knew of. What instances can you tell us about where people like that were on planes with you during the '84 campaign?

A It is hard for me to say. There is one trip, and I don't recall the event, but I think it was the Colorado -- I may have flown out to do business. But I remember I was cramped with Stan Schneider and Rosen and a whole bunch. And I remember I was mad because I didn't get to sit where I wanted to use the phone so there was an incident where we were all crammed into that little thing. This had to be --

Q Was that -- do you know when that was?

A I don't remember that date.

Q Do you remember if it was --

A It may have been --

Q -- in 1984 or later?

A It is hard for me to say.

Q Was Gary Hart on the plane?

A No.

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Q Do you remember if it was in the heat of the campaign?

A The only time Gary Hart, if I can recall, flew on the plane during the campaign is when we chartered a plane from Long Beach in early June, the first day of the filming, the day we filmed at Union Square and filmed out at the beach, we flew a G-2 with the Secret Service and CBS and David Stein and myself and Gary and I forget who else flew from Long Beach to San Francisco on a G-2 which is a biller jet, 12-passenger.

Q That was a plane you chartered?

A Yes. Through Sky Bird Aviation. Martin may have arranged it. I remember they picked me up in Orange County and we flew to Long Beach and picked up everybody.

Q Where did you pick up everybody?

A Long Beach. Gary had done a thing earlier that morning in Long Beach.

Q Was that a trip that you put on your charge card or the company paid for?

A I don't recall. At that point I owned the company. So in June of '84 it was still mine.

Q Well, I guess the question is did you or the

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company bill the Hart campaign for that flight?

A I don't remember. I doubt it.

Q Can you remember any discussions about the propriety of the company paying for that?

A No. It was "Can you get us a plane? No problem." It was never like, as I said, you know, "Stuart, blank, blank, blank, dot, dot, dot."

Q You've made that reasonably clear. Who asked you for that plane? Who made the request?

A I don't recall. Rosen may have been involved in that because that was the Gallanty commercial. It is hard for me to say exactly who. He may have asked someone in my office. By then I am sure people knew who the people in the Hart campaign were.

Q This was June of 1984?

A Yes. By now they had been hounded for money and elections, et cetera.

Q If I recall, there were payments made in May of '84 that were connected with the filming you talked about?

A Yes. By now I might not have taken that call. Someone may have walked in and said can we get a plane, and somebody said yes. It is not the type of thing I

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would deal with. I cannot believe on a regular basis making those types of arrangements.

Q Tell me again, please, who was on the plane, to the best that you can.

A I know David Stein was and Gary was and I was, couple Secret Service guys and couple CBS film crew guys. There may have been some other people, but that is who I recall.

Q You cannot remember you or the company ever being paid for that?

A No.

Q So those are two instances during the '84 campaign, going to the convention and in June of '84 the chartered aircraft were used to go to some sort of political events.

Was there any other that you can recall during the 1984 campaign?

A One day I think Gary had a reception or a breakfast in San Jose on a Saturday or something. In fact, I think I met Steve Wozniak at that event, the Apple computer guy, and I think I just got up one morning and said I should go up and see this.

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So I went to the airport by myself and flew to the event. I don't think there was anybody in the plane with me. I think I met him at the airport. Drove from one place to another. I sat next to the candidate in the motorcade and like I always do, went home on Saturday. I was not a groupie, per se, but there may have been another time like that.

Q Met who at the airport?

A I met them at the restaurant and they went somewhere else.

Q Met who at the restaurant?

A Gary Hart and the entourage of people. It was an event. I remember quietly walking out there by myself and flying back home. Probably by myself.

Q You chartered a plane?

A Yes.

Q When was that, approximately?

A I don't remember. It had to be in May. Probably in May or some swing through California.

Q It was in some proximity to the primary?

A Yes.

Q Were there any trips that you can remember

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during 1984 that Doug Rosen was on, other than the ones you mentioned?

A He may have been on a bunch of the trips. He would call and jump on the airplane.

Q Tell me about that.

A It is a sense I had he was on the airplane a number of times. It is hard for me to tell you specific times. I was flying these -- we flew a lot.

Q Try to remember, during 1984, can you approximate the number of times that Doug Rosen traveled with you?

A It is hard for me because it runs together through '85 and '86 and '87. He always seemed to say -- he made a beeline to my secretary when I jumped on the plane to New York, sometimes he would show up or he would get a ride back. It is hard for me to say when he was or was not on the airplane.

Q In the period of time that you remember Rosen being intensively involved in the campaign in '84, how frequently did he join you during that time --

A I don't know.

Q -- if that helps you remember?

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A It is hard for me to recall. You know, the events I was talking about when Rosen and I went up to San Jose on a Saturday. I may have flown up on the campaign plane and flown back privately if it was a Saturday event. That's what happened. I flew to San Jose on the campaign plane from LAX and then went to the motorcade with Gary to the restaurant. What restaurant is it? Nolan Bushnell's restaurant, The Lighthouse, something like that. And then flew home by myself.

Q How would you have gotten to LAX from where you lived?

A Probably helicopter from Orange County. The Secret Service people looked as I landed in my helicopter very closely as I got out. It was like "Hi, guys. I am just going on the plane."

Q Are there any other specific trips that you can remember that Doug Rosen was involved in during the '84 campaign?

A There may have been others. Again, I was criss-crossing the country a lot. He may or may not have jumped on the plane a number of times.

Q How did that happen?

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A I may have told him we were going or he may have heard from my secretary I was going and jumped on the plane.

Q Did he ask you?

A Did he ask me?

Q Yes.

A You mean like "Can I go on the airplane with you?" I mean he probably said "If you are going, I will be there and can I go with you?" He is a polite individual.

Q Do you know the purpose for his travel in those times?

A Not that I remember.

Q Was it campaign business?

A I don't remember.

Q Did he have business interests that could have caused him to travel in the places --

A Going back to New York, he and his family had a major business in New York and his brother lived there.

Q Okay. During 1984, can you recall anyone else connected to the campaign in any way who used the plane that you chartered?

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A I think during the convention we may have sent a plane for Kenny Loggins to fly from Santa Barbara to the convention to perform. I think Patricia Duff actually flew down and picked him up in the plane and came back. I think she should have been in that trip.

Q That was from the convention in San Francisco?

A I think. That's where the plane would have been. It would have had to go back there. That plane was based in San Francisco.

Q If the convention was for several days, beginning, I believe, July 16, 1984, was it at the beginning of that?

A I don't recall. I'm sure the schedule of events will show you when the Kenny Loggins concert was for the Hart delegation.

Q Did you make arrangements for the chartered plane to go back up Kenny Loggins?

A I don't remember. You mean personally?

Q Yes.

A Probably not.

Q If you were in San Francisco at the time how would the arrangement have been made?

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A I don't know. I didn't deal with a lot of the details at times. Probably called my office and said they want to do this and those people got in touch and they did it.

Q Who asked you, if you remember?

A I don't remember. I cannot tell you if it exactly happened. I had a sense it happened. I never really followed up on it. Supposedly, I thought he was supposed to call and thank me, but he never did. He heard he is going to call and thank you, where are you going to be. I'm still waiting for the phone to ring.

Q Are there any other flights during 1984 that involved campaign people or activity that you can remember?

A I've tried to remember, but I cannot.

Q So there were -- you are confident there were a number of flights Doug Rosen was on, but you are not certain what his travel involved?

A No.

Q What the purpose of his travel is?

A No.

Q During 1984, do you remember, did you charter

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any helicopters that were transporting campaign people?

A Helicopters, campaign people? Maybe. I remember -- I don't know when it was -- I remember landing in Orange County because I wanted to get home and there may have been a helicopter to take Doug Rosen to L.A. because I didn't want to land in L.A. and have to let him off and get home an hour late. But I may have done that on a number of occasions.

Q So you have accommodated him?

A Yes.

Q Once we move past the '84 campaign period, Mr. Karl, and into 1985 and 1986, Ms. Reilly has discussed with you earlier on some fundraisers you were involved in and most recently we discussed some retreats you attended and it is apparent, there were some political activities that you engaged in during that period; right?

A Yes.

Q What chartered aircraft were used to transport campaign people for political purposes in the post-'84 period?

A I don't think it was formal. There are a number of times I remember being in Washington and picking Gary

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up and flying him to New York. I think that happened once or twice.

Q Approximately when was that?

A I don't remember that.

Q And do you know what business Gary Hart was involved in when you dropped him off in New York?

A No.

MR. BERNSTEIN: I would like to ask the reporter to mark this document as Exhibit 38.

(Karl Exhibit 38 identified.)

BY MS. BERNSTEIN:

Q I hand you an exhibit marked number 38. That is four pages. And do you recognize the first page of Exhibit 38?

A No. I -- this is looks like a Martin Aviation record, not one of mine.

Q It is entitled "Flight Log" in the right-hand corner. It reads "Martin Aviation Charter." Is this a record they used?

A This looks like their record. I would guess this is one of theirs that they filled out.

Q Did you ever have occasion to see records like

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this?

A Not that I recall. I would see the bills, like the one back here, but I don't remember seeing flight logs.

Q You are referring to page 3 of the exhibit?

A Yes.

Q Do you know if the flight logs came to your office?

A I cannot imagine they would. Maybe they did. It didn't seem like at the time that the document would show up in our office. Do you believe they came to my offices?

Q You certainly included some of them in your filings.

A I know. I don't remember seeing this.

Q So I gather you would not be a source on how these forms are completed or what the entries mean; is that right?

A That is correct. This looks like a Martin document.

Q Let me point you to the third page of the exhibit, and I think you said that -- which is an invoice

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from Martin addressed to Rama White?

A Yes.

Q She was your assistant?

A Yes.

Q And you stated this was the sort of invoice that you did see from Martin Aviation?

A From time to time, yes.

Q Do you notice that the fifth line of the description, apparently there was a helicopter flight, reads "Reference, Senator Hart"?

A Yes.

Q Do you think this was a helicopter trip Senator Hart took?

A This is '85, right? Yes, it looks like it. Now, when was the date? What is the date on this?

Q April 26, 1985.

A When is the retreat at the ranch?

Q Perhaps if you turn to the last page of the exhibit, which is a calendar.

A This is off Rama's desk.

Q Is this is a calendar, page from a calendar maintained by Rama White?

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A Yes.

Q Is this all her handwriting?

A Yes.

Q Does this refresh your recollection about what the helicopter flight might have been related to?

A It probably flew Gary to or from this event. In fact, after the boat ride there were two helicopters there.

Q This was the retreat that you attended, the barbeque and boat ride and that was it?

A From the boat ride, in Dana Point Harbor the helicopters came and took him away.

Q So they were both helicopters you chartered?

A Most likely, yes.

Q Why were there two helicopters?

A A lot of people. Gary went one way and we went one way. Quantity, it says "quantity, two."

Q Do you know where they went?

A It says here LAX, Santa Ana Airport. I think Lee was flying out of LAX and Gary was flying out of Santa Ana. If I recall, they had two different destinations or the opposite --

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Q Did helicopters transport people in addition to Senator Hart?

A They were full of staff people.

Q How did it arise you chartered helicopters to transport Gary Hart and Lee Hart to their various destinations?

A I think they knew I had access to airplanes and Rosen and people like that would call me and up and say, "Can I get a plane," and I said, "Sure."

Q Do you know if your company paid for this or if you did?

A I don't know which would at the time.

Q And was a bill ever sent to Gary Hart or any entity by you?

A I don't know.

Q Do you remember the subject ever being discussed?

A No.

Q Was there a procedure for paying for personal travel versus company travel?

A I don't recall. I mean when?

Q We are into 1985.

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A I really don't remember. I am sure at some point in time somebody analyzed it and looked at it in terms of company accounts.

MR. BERNSTEIN: I will show you another flight log and ask the reporter to mark it as Exhibit 39.

(Karl Exhibit 39 identified.)

BY MR. BERNSTEIN:

Q Have you had a chance to look at this?

A Yes, as much as I can figure out what it says.

Q I asked you to --

A Comment on this?

Q Yes.

A There was an event as it says here on Rama's notes, Polisis house, P-o-l-o-s-i-s, house that my wife and I flew up, it was for his book. He had a book-signing for one of his books and my wife and I flew up to the event. And, as I recall, we had possibly Bernie Schneider with us on the airplane or he was already up in San Francisco and we flew Gary from that event down to LAX and dropped Gary off or John Emerson picked him up and we flew home.

Q Gary Hart?

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A Yes. That is what this one is.

Q Do you know what Gary Hart was involved in at the time?

A It is -- this is for a book thing. It says book-signing at the house.

Q Were there any fundraisers for the '84 committee?

A This was in '85.

Q Debt reduction fundraisers for the '84 committee in this period?

A I don't know. This may have been it, but I don't know.

Q You are certain that Gary Hart was on a plane?

A Yes. On the way back, yes, from San Francisco to LAX, and we dropped him off and went back home to San Diego.

Q And again, do you have any recollection of you or anyone else billing anyone for this?

A No.

Q How did Gary Hart come to join you on the way back?

A I think someone must have called my office and

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said he wants to come back to L.A. and can you give him a ride back, and I or someone said sure and asked if it was all right, and I said that is great.

Q In any of these flights you were on with Gary Hart, did the subject of who is paying for the flights ever come up?

A Not that I recall.

MR. BERNSTEIN: I would like to ask the reporter to mark this as Exhibit 40.

(Karl Exhibit 40 identified.)

BY MR. BERNSTEIN:

Q This is a nine-page document, Mr. Karl. It has a cover note on it that has Rama's name at the bottom. And there are two trips that are referenced in this exhibit, one which was dated June 22, 1985 and the second which was dated October 18, 1985. And I wonder if you would examine the exhibit, and particularly, I am interested in what you can remember about the two invoices, the one relating --

A I don't remember ever seeing these.

Q I guess I would point you to the first -- the second page the exhibit.

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A I don't remember seeing that.

Q Are you certain?

A I don't remember it. I certainly don't remember it.

Q And do you have the same reaction to the second invoice which is three pages from the back of the exhibit?

A I may have seen it but I don't remember it.

Q Do you recall debt reduction fundraisers that took place on these dates, in June of '85 and in October of '85?

A I don't remember. I mean, no, I don't recall any.

Q It looks to us that this represents a bill that was being sent apparently on your behalf of Americans With Hart belatedly, and what can you tell us about that?

A Nothing. I told you, I don't remember it.

Q Did you ever discuss with Rama, your secretary, the subject of whether a bill should be sent to the Hart committee?

A I may have, but I don't recall. We had sent bills earlier. It obviously appears Richard asked for a

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bill and she sent one.

Q Did she ask you about it?

A I don't recall. She may have. I tell you I don't remember.

Q Did you order deluxe catering when you knew Gary was going to be a passenger?

A No. That is the first time I've see how they do this. This is an educational process for me. They knew I liked a certain meal. I didn't know they went out and spent $200 for it on top of everything else. This is the first time I have ever seen this stuff. You know, this stuff just shows up. I didn't know some guy went out and paid 225 bucks for it.

Q I think that had you testified that you did see the Martin Aviation invoices?

A Yes.

Q If you look at the last page of the exhibit, do you remember seeing this one which indicates that passengers were Mr. and Mrs. Stuart Karl, Senator Gary Hart, Richard Wagner and Bill Shore?

A No, I don't remember seeing this one. I see them from time to time. As a rule, invoices would not

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come to me. I am getting back to where our mail went.

Q So do I gather it was not an unusual occurrence during this period for Gary Hart and his aides to travel in one of your planes?

A I would not say it was a standard occurrence. Obviously there was a period of time when they did it but it was not like a regular event.

Q What I am trying to get at --

A It was not like aircraft at your call in any sense.

Q I guess what I'm trying to get at is if you did see these invoices from time to time, would it have stuck out in your mind?

A I probably knew they were flying on a plane. They probably would say can, Gary fly on your plane. And I would have said sure.

Q It looks like you were a passenger, according to this.

A If this is the one that supposedly went to Fresno --

Q Yes, in the June one?

A I didn't go to Fresno. This June one -- I'm

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looking at the October one, the Fresno one, I didn't go. I remember that. If you check the date of the week it was probably a Saturday. In fact, flight date 6/22, that is my birthday and I know I didn't go.

Q What can you remember about the October one where you were listed as a passenger?

A I don't remember that one.

Q Nothing?

A I don't remember anything.

Q Do you have any idea, Mr. Karl, why would have prepared a bill for these two flights and sent them to the Hart committee?

A Should I speculate? I don't know why. I can only speculate.

Q Okay.

MR. BERNSTEIN: I would like to ask the reporter to mark this as Exhibit 41.

(Karl Exhibit 41 identified.)

BY MR. BERNSTEIN:

Q I would ask you to look at that, please.

(Pause.)

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BY MR. BERNSTEIN:

Q These are two flight logs; one dated October 31, 1985 and the other dated November 3, 1985. It indicates that Doug Rosen and/or Mrs. Rosen --

A There is no Ms. Rosen. When is this?

Q October and November 1985. Did Doug Rosen's mother travel on your planes?

A She may have. To go to Palm Springs?

Q No. San Diego.

A San Diego? She -- I think she had a house -- she may have. I mean his mother is a great lady. We may have flown her to San Diego. In fact, now that I think about it, I think we did.

Q Do you have any idea why on the first page of the exhibit it would indicate Doug Rosen authorized this charter?

A Probably I said you call them. He called up and said I am calling for Stuart and that's all I can speculate. He knew these guys. Doug used to own his own airplanes and he is familiar with the whole process. His family had airplanes.

MR. BERNSTEIN: Please mark this as Exhibit 42.

9304350 46666

(Karl Exhibit 42 identified.)

BY MR. BERNSTEIN:

Q Exhibit 42 is a six-page exhibit which indicates apparently helicopters or jet copters on December 5, 1985 and December 8, 1985 and which appears to be another instance where Gary Hart was transported. Do you remember this instance?

A There may have been an event down -- it was obviously going to, Mission Community Hospital, if that is the one I am thinking about it's down by Mission Viejo, where obviously there would have been was a Stein event of some kind maybe something Gary flew from LAX down there.

Q Was he going to hospital?

A No, but that is where he would land because there's no airport down there. You would get clearance to land there if the Mission Viejo to go on a Stein event and there was events down there, in fact, I think I flew Jane down there to be at and I was going to go and I got sick. She --

Q Jane Fonda?

A Yes. Just as a company courtesy. I -- it may have been something --

9304350 46667

Q What kind of Stein event do you think it was?

A I don't know.

Q What kind of Stein events were there in December of 1985?

A I don't remember. A western something.

MR. BERNSTEIN: I would ask the reporter to mark as Exhibit 43.

(Karl Exhibit 43 identified.)

BY MR. BERNSTEIN:

Q This is Exhibit 43, and it is a flight -- we move now to 1986 so this is on February 6. Passengers on this flight apparently were Doug Rosen and Steve Rivers.

A Yes.

Q Was this a helicopter?

A Yes, it looks like a helicopter.

Q How do you tell that?

A 444CR, I think is a helicopter.

Q Where are you reading?

A Aircraft here. That is a helicopter under itinerary and Santa Monica is where we fly back and forth to LAX rather than be in traffic all day.

Q Do you remember this?

9304350 46668

A They may have been coming down for business.

MR. BERNSTEIN: Mark this as Exhibit 44.

(Karl Exhibit 44 identified.)

BY MR. BERNSTEIN:

Q Have you had a chance to look at this?

A Yes.

Q And it is a three-page exhibit which has a flight log and invoice and then a calendar. Again, is this a calendar if Rama White-Mandell?

A Yes.

Q Based on your review, what can you remember about this flight?

A Nothing, but it looks from this, Gary Hart flew down for the Port Theater screening.

Q That was the fundraiser you described earlier?

A Yes.

Q Yesterday?

A Yes.

Q What can you remember about how these arrangements were made?

A I cannot remember a thing.

Q Were you on the plane?

9304350 46669

A No, I don't think so. I can't remember.

MR. BERNSTEIN: I would like the reporter to mark the next exhibit as Exhibit 45.

(Karl Exhibit 45 identified.)

MR. BERNSTEIN: Would you mark the next three exhibits at this time, please.

(Karl Exhibits 46, 47 and 48 identified.)

BY MR. BERNSTEIN:

Q What can you tell us about the flight log and invoice that is Exhibit 46?

A What do you want to know? You mean 45?

Q Sorry. 45.

A I have never seen these before, not that I recall.

Q Do you remember flying to Washington to meet with Senator Hart?

A Not at this time, no, I don't.

Q Referring you to Exhibit 46, do you remember anything about this flight?

A No.

Q Well, do you remember there being any shooting

9304350467 0

for the Hart video in November of 1986?

A Yes, there may have been. Yes, there may have been. Without having any of my records or any of my calendars to remember what my exact schedule was in those periods of time, I cannot remember.

MS. FULTON: Do you have something to help him make the connection, a document that could refresh his recollection?

MR. BERNSTEIN: Not in the next four minutes, no.

BY MR. BERNSTEIN:

Q Turning to Exhibit Number 47, it is a three-page exhibit describing travel on December 8, 1986. Do you remember this trip?

A No.

Q Do you remember Mr. Emerson being a passenger on a plane you were on?

A Not that I recall.

Q Turning to Exhibit 48, which is a five-page exhibit, the front page of which is a flight log from February 24, 1987, I would ask you to review that.

A Okay.

9304350 46711

Q This was a flight to Denver, wasn't it?

A Yes.

Q It indicates that a passenger was Griff Ames?

A Ames.

Q Who is that?

A A business associate. We talked business all the way out about advertising.

Q Why were you going to Denver?

A There was a fundraising committee meeting going on, or some meeting. I don't know if it was a fundraising, it was a Hart meeting going on. I used the airplane to talk to Griff Ames about business for a few hours; nothing to do with Hart.

Q Was there anybody else on the plane?

A No. Two pilots, thank God.

Q Did anybody else come back with you?

A I don't think so. I don't think so. Maybe. I don't recall. I think I came back the same day, the night of the Grammys.

Q Do you remember flying to the Kennedy Center -- to Washington for a Kennedy Center event in late 1986?

A Kennedy Center in D.C.?

9304350467 2

Q Yes.

A I don't think I have ever been there. Maybe I have.

Q Let me ask you, other than the invoices that we have reviewed which show transportation of Gary Hart and other people connected with his campaign efforts, can you recall other instances where you chartered airplanes for Senator Hart or any of his entourage?

A I hardly remember these instances.

Q How about instances where you transported other candidates?

A There was another incident that I recall, the Lorimar plane. They asked if -- I think there is a memo to the extent where I asked our chairman if we could use the Lorimar plane to fly Gary from somewhere to somewhere in upper Midwest, and I got approved, yes. There is a set of memos that would indicate that. It was not through my division but through the parent corporation, through our chairman's office.

Q What was the purpose of that trip?

A Transportation. I don't know the purpose. Getting him from one place to the other.

9304350467 3

Q Why would you ask for the use of the Lorimar plane as opposed to just chartering the plane yourself?

A I don't know why. For some reason I think somebody knew that plane -- I don't know why. Maybe somebody knew something more than I did and said why don't you ask for that plane.

Q Do you remember transporting Congressman Gephardt in SOLARZ in 1985? .

A I don't recall that. Flying Gephardt?

Q Yes.

A Helicopter or plane?

Q What does 400 JE signify?

A How much is the bill?

Q The bill is $15,299.40?

A I do not remember flying Gephardt.

Q You are not sure what that would be in connection with?

A No. I tell you I do not remember flying Gephardt.

Q That appears to be from Orange County to Teboville, New York?

A Gephardt?

9304335 4674

Q Yes.

A What do you know? I really don't remember. Is my name on that invoice? Karl Video? No other company -- maybe I was getting billed every time a politician or candidate, billed it to me.

Q How about Senator Dodd also in December of 1985?

A I don't remember that one, either. Is that billed to me, also?

Q Do you remember any flight like that?

A No.

Q And how about Senator Carey?

A I may have flown Carey from a helicopter. Is that a helicopter ride? 500 bucks?

Q What does L-1 mean? That's the aircraft designation?

A How much is the bill?

Q $952?

A Sounds like the helicopter for the event at my house. Maybe I flew him down to Orange County, maybe not.

Q Would that be in connection with the Carey fundraising events?

A Possibly. I have never met Dodd. Both

9304335 4675

Ms. Reilly and Ms. Fulton raised objections. Both said "I am going to object to that."

In the Gephardt event, maybe I was flying to see Gephardt. I did fly one time when I saw him in Washington D.C.

Q Did Senator Carey's committee pay you or the company for this?

A I don't recall.

Q Did you ever send any bills other than the two that I showed you that you didn't remember?

A I don't remember.

Q You don't remember sending any bills?

A I don't remember.

Q I think just in time we have exhausted the subject of transportation.

A Can I see the Dodd bills?

Q Once we go off the record I'll be happy to show them to you. One area that we discussed off the record that I would like you to elaborate on. Maybe I can ask a couple foundation questions.

Did you plead guilty, Mr. Karl, in connection with a criminal proceeding that relates to some of the

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transactions that we have been discussing?

A Yes.

Q And were you sentenced in that proceeding?

A Yes.

Q What was the sentence?

A $60,000 fine and three years' probation.

Q Have you served your sentence?

A The probation is not up yet.

Q So at this point you are on probation?

A Yes.

Q Have you made payments for the fine?

A Yes.

Q What payments have you made?

A I don't know the exact amount. I make them periodically. I'm working it down.

Q How much are the periodic payments?

A Usually I pay $1000 every time I see my probation officer, once a month.

Q 1000 dollars a month?

A On an average. It is hard for me to say specifically without sitting here and recapping it. It has been a year and a half.

9304350 46777

It took a while to get started because of my other problems and then I recently started in the last five or six months.

Q How long have you been paying these?

A I couldn't tell you exactly.

Q Approximately?

A Last year.

Q Have you given full and complete information in response to Ms. Reilly's questions and my questions?

A To the best of my recollection, yes. As much as I remember, I've tried to be --

Q Do you want to modify any answers you gave or clarify any answers at this time?

A I don't think so.

MR. BERNSTEIN: Let me explain that we are adjourning the deposition and not closing it. And that means that, should the need arise, we would let your counsel know if we need to recall you to take further testimony. We don't have any intention of doing that at this time.

And let me also memorialize the understanding we

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have, that we expect to hear from your counsel within three weeks with regard to the personal bank records of yours. In addition, you will be receiving a witness check for your appearance here for the last two days.

Are there any statements that you would like to make at this time?

MS. FULTON: Could I clarify something for the record in terms of the timing that you expect to hear back from counsel? My recollection, I am sure the record will reflect, is Mr. Karl was going to, within the next three weeks, attempt to located bank records and be in touch with me, at which time I would have an opportunity to review them, but certainly as soon as I know something from Mr. Karl in terms of what kinds of bank records he can locate, I'll be in touch with you.

MS. REILLY: In terms of this may depend on whether or not you have to get them from your bank.

THE WITNESS: Exactly.

MR. BERNSTEIN: Are there any statements you would like to make, Mr. Karl?

THE WITNESS: No.

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MS. BERNSTEIN: Okay.

(Whereupon, at 6:05 p.m., the deposition was concluded.)

_____

GEORGE STUART KARL, JR.

9304350046880

DEPOSITION EXHIBIT 13 KARL

TO: Rama White, Karl Home Video
FROM: Betsy Kenny, Americans With Hart Convention Office
DATE: June 7, 1983

Here is a list of the Hart Convention staff people who will require rental cars during the Convention week. If possible, we would like to be able to get five cars early.

Early cars (as soon as possible through the Convention week):

Betsy Kenny
Tim Connelly
Scott Van Hove
Beth Donovan
Mike Cheroutes

Convention week cars (July 13 - July 20)

Mark Emblidge
Carol Dickenson
Joann She pard
Keith Glaser
Mary Alice Manderich
Steve Morrison
Carol Casey
Mike Levy
John Babs
Lymon Bishop
Doug Wilson
Eli Segal
James Dwinell
Liz Feldman
Will Kanteres

Thank you so much for your help, Rama. Please thank Stuart, too. You can reach me at 415/546-1221.

Americans With Hart Convention Office
185 Berry St., Suite 363
San Francisco, CA. 94107

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000317

KARL VIDEO

Still out 7/24/84

From The Desk Of
Rama White

5/84 Bill Bradley (Catherine Rich) ~~CAR RENTALS~~ = $154.06 (attached bill)

6/20/84 to 7/23 Betsy Kinney (415) 546-1221

5 cars rented from Budget Rent-A-Car, Airport Holiday Inn, San Francisco (415) 872-3128. 245 S. Airport Blvd. S.F.

Rented at 475.00 per month each = $2,375.00
(to be returned approx. 7/23)

1. Mark Emblidge
2. Carol Dickenson
3. Tim Connelly
4. Scott Van Hove
5. Keith Glaser

7/2/84 to 7/23

1 van (cargo?) from Mid-Way Rental, Pico & Riverea, L.A.

1. Paul Carey
   @ $180.00 per week, 1200 miles free then.27¢ per mile

7/6/84 to 7/23

2 cars from Budget at Airport Holiday Inn, S.F. to:

1. Ervin Torell
2. Mark Emblidge

@ 120.00 per week plus $6.00 a day insurance.

7/9/84 to 7/23

3 cars and 3 cargo vans from Budget, S.F. (same as above)

1. Debbie Graham (van)
2. Crayton Smith (van)
3. Lynn Williams (van)
4. Jeanne Shaheen (car)
5. Carol Casey (car)
6. Mike Houlihan (car)

$, car same as above, vans are 174.00 a week + 8.00 day ins.

000316

GEORGE S. KARL
Executive Vice-President
Chairman of the Board

Coberly
SINCE 1918

SALES • LEASING • SERVICE
ALL MAKES • ALL MODELS

1940 S. Figueroa St.
Los Angeles, Ca. 90015
Telephone: (213) 748-9201

000318

MIDWAY RENT-A-CAR

345 North La Brea Avenue
Los Angeles, California 90036
(213) 939-3111

1891 South Figueroa Street
Los Angeles, California 90015
(213) 749-4575

No. 2353

ORIGINAL VEHICLE

CUSTOMER: [illegible]

ADDRESS: [illegible] #1128

CITY: [illegible] STATE: [illegible] ZIP CODE: [illegible]

DRIVER'S LICENSE NO.: [illegible] STATE: [illegible] EXP. DATE: 2-7

AGE: [illegible] SOCIAL SECURITY NO.: [illegible] HOME PHONE: [illegible]

LOCAL CONTACT OR ADDRESS: [illegible] PHONE:

EMPLOYER'S NAME: [illegible]

EMPLOYER'S ADDRESS: [illegible] PHONE:

CITY: [illegible] STATE: [illegible] ZIP CODE: [illegible]

VEHICLE NO.: 3363 LICENSE NO.: [illegible]

YEAR-CAR LINE (TRUCK SERIES): [illegible] MODEL AND COLOR: [illegible]

SPEEDOMETER IN: 21082 DATE AND TIME IN: 84 JA 18 P 2:19 A.M. P.M.

SPEEDOMETER OUT: 19357 DATE AND TIME OUT: [illegible] 21 P 2:51 A.M. P.M.

MILES DRIVEN: DATE DUE AND EXPIRATION OF CONTRACT: 6 6 51 A.M. P.M.

REPLACEMENT VEHICLE

VEHICLE NO.: LICENSE NO.:

YEAR-CAR LINE (TRUCK SERIES): MODEL AND COLOR:

SPEEDOMETER IN: DATE AND TIME IN: / / A.M. P.M.

SPEEDOMETER OUT: DATE AND TIME OUT: / / A.M. P.M.

MILES DRIVEN: DATE DUE AND EXPIRATION OF CONTRACT: / / A.M. P.M.

REMARKS

Bill C. Cabenty Pcn
Cash (1)

CONDITION OF CAR - DAMAGE PRIOR TO RENTAL

FUEL GAUGE POSITION

GAS OUT	GAS IN
E	E
	1/4
1/2	1/2
3/4	3/4
F	F

COMPREHENSIVE/COLLISION DAMAGE WAIVER — ACCEPTS [illegible]

RATES: 5 PER DAY _____ PER WEEK _____

By his/her initials, Customer accepts or declines Comprehensive/Collision Damage Waiver at the rates listed above. If Customer DECLINES to Purchase the Waiver, he/she accepts full responsibility for all loss/damage to the rented vehicle up to $500.00 per occurrence, regardless of cause. — DECLINES

PERSONAL ACCIDENT INSURANCE — ACCEPTS OK — DECLINES

Benefits	Renter	Passenger
Loss of Life	$150,000	$15,000
Medical Expenses	1,500	1,500

RENTER'S LIABILITY

ITEM 1: TO ASSUME RESPONSIBILITY FOR ALL COLLISION DAMAGE TO RENTED VEHICLE. THIS LIABILITY TO BE LIMITED TO $500.00 EXCEPT AS PROVIDED HEREIN.

ITEM 2: CARS PREMATURELY TO BE SURRENDERED IF RENTED AND KEPT FOR MORE THAN 2 DAYS. VEHICLE CODE SECTION CALIFORNIA VEHICLE CODE.

OK

EXCESS HOURS @ $ PER HOUR	$	
28 DAYS @ $ 15.00	$ 420	00
WEEKS @ $	$	
MONTHS @ $	$	
MILES @ ¢ PER MILE	$	
TOTAL MILEAGE AND RENTAL CHARGES	$ 420	00
DRIVERS 1.5 ea	$ 27	30
[redacted]	$ 140	00
[redacted]	$ 56	00
LESS CREDITS Parking tickets	$ 82	00
Airport Drop, SAS	$ 7	
TOTAL CHARGES	$ 753	05
LESS DEPOSIT [redacted]	$	
	$ 754	05
CASH REFUND Bill CaBenty	Renter's	

Customer will not under any circumstances surrender the use of the Rented Vehicle to any person other than those listed below or in Paragraph 1 of Rent-A-Contract of the vehicle by any driver under 21 years of age or in violation of Par. agraph 2. If none, print NONE across the spaces provided below and initial in the space.

GARY HART
FOR PRESIDENT

July 3, 1984

Stuart:

This is our best guess on cost and payment terms for all Hart activities planned for the Convention.

As you know, we all appreciate very much your willingness to help us out with the financial arrangements. I doubt we could have planned much of any "delegate persuasion" activities without you.

I will continue to keep in touch with Rama and work out the details on a daily basis.

I look forward to meeting you and thanking you personally for all you have done.

Sincerely,

Keith Glaser

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BUDGET

ITEM	VENDOR	COST	TERMS
(Delegate Packets)			
1. Pads	Blake Moffit & Towne (415) 330-1115 Contact: Ray	$.31 each x 5,040 pads $1,566	Uncertain--Marti thinks credit may be okay
2. Pens	Scotty Pens (415) 982-1172 Contact: Mel	$.14 each x 5,000 pens $ 700	50% deposit, check or money transfer, balance can be mailed after we get pens
3. Folders	More Plastic Bags (415) 863-1475 Contact: Paul		We have paid $1,500 of $3650 total
(Demonstrations & Sale)			
4. Beach Balls	Jack Nadel, Inc. 302 4th St. Oakland, CA 94607	75 X $1.66 = $124.50 Shipping = 64.85 Print cut Chg. 31.30 TOTAL $233.15	
5. Balloons T-Shirts (red) Baseball Caps T-Shirts (white) Magnets	National Screenprint 14648 Griffith St. San Leandro, CA 94577 30% Down, Bal. C.O.D.	1,000 @ $90 x3 = $ 270 1,500 @ $3.40 = 5,100 160 @ $2.40 = 384 1,000 @ $3.20 = 3,200 1,000 @ $ .44 = 440 TOTAL $9,394	
6. Key Tags	Patrick & Co. 560 Market St. San Francisco, CA 94104 50% Down, Bal. C.O.D.	500 @ $225 x 8 = $1,800	
7. Frisbees	Wing Aero 5614 Central Ave. Richmond, CA 94804 50% Down, Bal. C.O.D.	1,000 A $1.10 = $1,100	
8. Wood (Demonstration)	Fairfax Lumber Fairfax, CA (Marin County)	$.10/ft. x 12,000 ft. = $1,200	
9. Posters 1) demonstration 2) sale	Grace Co. 1631 Yosemite San Francisco, CA (415) 822-3166	6,000 x .25 = $1,500 2,000 x .25 = 500 TOTAL = $2,000	

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BUDGET
(cont.)

ITEM	VENDOR	COST	TERMS
(Magazine)			
10. Typeset	American Printing 45 Washington St. San Francisco, CA	$300.00	
11. Photo Processing	Deborah Walker 780 Mcdonell Dr. S. San Francisco 94080	31.95	
12. Magazine	Warren's Lawler Press 2136 Palou Ave. San Francisco, 94124	$6,700	50% down by 7/9 Balance due 7/13
	TOTAL:	$25,025.10	
	less deposits:	(1,500.00)	
	NET TOTAL:	$22,525.10	

1. Turnaround time is of utmost importance. Some items order and delivery time is 4 to 5 days. The above chart indicates in some places payment deadlines; these items have been ordered. The remainding items need to be ordered and paid as soon as possible.

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KARL HOME VIDEO

HART ACTIVITIES AT CONVENTION

DATE	AMOUNT
5/30/84: De France Printing Wired to Mitzubishi Bank, Mira Mesa Branch 9189 Mira Mesa Blvd. San Diego, 92126 Acct. # 270-106-991 Route # 90-923 Phone: (619) 566-5200 (wired by Cathy Bramnick, requested by Steve Robbins)	$219.90
5/31/84: The Harman Press, 1227 N. Highland Ave. L.A. 90010 Wired to Wilshire Bank 4155 Wilshire Blvd. Los Angeles, 90010 Acct. # 01-504-150 Route # 122-038-874 Phone: (213) 934-8222 (wired by Cathy)	$9,052.52
5/31/84: Audio Visual West, Inc. Wired to Wells Fargo, M. Valley 123 Camino De La Runa San Diego, 92108 Route # 16-24-652-1220 (wired by Cathy)	$450.00
5/31/84: The Harman Press (second payment) same as above (wired by Cathy)	$228.98
6/1/84 (?) Pacific Entertainment c/o Mario Romero Security Pacific Bank 333 S. Hope Street Los Angeles, 90071 Acct. # 252-0790146 Routing #122-00043 wired by Cathy	$1,250.00
6/5/84 The Grace Co. (posters) c/o Hart For President 185 Berry St. China Basin Bldg. #363 San Francisco, CA 94107 FIB check	$1,544.25
6/5/84 Jack Nadel, Inc. (beach balls-"Hart For Pres.) 302 4th St. Oakland, CA 94607 Attn: Karin Viets FIB check	$233.15

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000320

899 West 16th Street, Newport Beach, CA 92663 (714) 645-7053

KARL HOME VIDEO

HART (cont.)

6/5/84
American Printing (typesetting for Hartbeat mag.) $300.00
c/o Hart For President
(same address as page 1) FIB check

6/5/84
National Screen Print (balloons & baseball caps) $544.00
14648 Griffith St.
San Leandro, CA 94577
Attn: Tom Murphy
FIB check

7/3/84
More Plastic Bags $1,500.00
Cathy wired
info not avail.

7/9/84
Wing Aero (frisbees) $835.00
5614 Central Ave.
Richmond,CA 94804
Attn; Brian Shea
FIB check

7/9/84
National Screen Print (tee-shirts) $1,600.00
14648 Griffith St.
San Leandro, CA 94577
Attn: Tom Murphy
FIB check

7/9/84
Warren's Lawler Press (magazine print) $4,000.00
c/o Hart For President
(same address as page 1) FIB check

7/9/84
Kindel Graham (helium for balloons) $95.85
c/o Hart For President
(same as page 1) FIB check

7/9/84
Scotty's Pens (delegate pens) $745.50
c/o Hart For President
(same address as page 1) FIB check

7/9/84
Blake Moffit & Towne (pads) $1,665.00
c/o Hart For President
(same address) FIB check

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KARL HOME VIDEO

HART (cont.)

7/9/84
More Plastic Bags (folders) $2,150.00
c/o Hart For President
(same address) FIB check

7/9/84
Tubes & Cores, Inc. (tubes) $684.00
c/o Hart For President
(same address) FIB check

7/10/84
American Printing Co. (typesetting) $355.51
c/o Hart For President
(same address) FIB check

7/10/84
Debra Walker (graphic supplies) $71.60
c/o Hart For President
(same address) FIB check

7/10/84
Contract Reproductions (posters) $1,724.00
c/o Hart For President
(same address) FIB check

Total $21,249.36

* FIB Total $ 16,549.56 *

SK:rw
7/26/84

930435046900

000322

KARL VIDEO CORPORATION

Ron
MAJOR
Prosecet
You must!
hand me
on doing
AT Billing
TO START
company
money!

June 1, 1984

Bank of Newport
ATTN: Shirley
Wiring Dept.
Coast Hwy. at Avocado
Newport Beach, CA 92660

Dear Shirley:

The following amounts have been authorized to wire to the following accounts. The first two are drawn on our account 02 164167 16:

1) $219.90 wired to De France Printing, Mitsubishi Bank Mira Mesa Branch, 9189 Mira Mesa Blvd., San Diego. Account # 270-106-991.

2) $9,052.52 wired to The Harman Press, Wilshire Bank 4155 Wilshire Blvd., Los Angeles. Account # 01-504-150.

The following are drawn on our account #02 164 167 01.

1) $450.00 wired to Audio Visual West, Inc., Wells Fargo Bank, Mission Valley, 123 Camino de la Reina, San Diego. Account # 0652-028-465.

2) $228.98 wired to The Harman Press, Wilshire Bank, 4155 Wilshire Blvd., Los Angeles. Account # 01-504-150.

3) $479.50 wired to The Harman Press, same as above.

4) $1,250.00 wired to Mario Romero, Security Pacific Bank, 333 S. Hope St., Los Angeles. Account # 252-079-146.

Thank you for your help.

Sincerely,

Dennis M. Blackburn

Dennis M. Blackburn
Chief Operating Officer

899 West 16th Street, Newport Beach, CA 92663 (714) 645-7053

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000323

THE PIN COMPANY
2254 Union - No. 4
San Francisco, CA 94123

June 26, 1984

Mr. Doug Rosen
Hart Campaign Headquarters
507 8th Street S.E.
Washington, D.C. 20003

Dear Doug:

This is to thank you for your order of 3750 HART pins for the up coming convention.

We received the deposit check today from Stuart Karl, and have processed the order. We are taking every step to expedite this order, and will advise you promptly of any changes.

Sincerely,

Ron Bortree

RB:mc

cc: · Stuart Karl

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000324

(415) 839-7374

8

KARL VIDEO

From The Desk Of
Rama White

Bill Bryan
Tom Epstein-
of Hart.

$ [redacted]

to Pacific Entertainment
acct. # Mario Romero
→ 252-079-146
Security Pacific Bank
333 S. Hope St.
L.A. 90071
(213) 613-5838
routing # 122 000 43 wrong
122-0000-43 right

(213) 850-63[illegible]

OK

Never used

call Tom Epstein
(213) 850-6338

000306

Karl Video Corporation, Newport Beach, California 714/645-7053

9

KARL VIDEO

From The Desk Of
Cathy Bramnick

Steve Robbins
850 - 6338

1) [redacted] A/C# Audio Visual West Inc.
0652-028-465
Wells Fargo - M. Valley
123 Camino de la Reina
S.D. 92108
RT # 16-24/652-1220

(4)

2) [redacted] Herman Press
A/C 01-504150
Wilshire Bank
4155 Wilsh. Blvd.
L.A. 90010
RT # 122-038374

By - TODAY

000307

10

Karl Video Corporation, Newport Beach, California 714/645-7053

479.50 - Hamm

P.O'Brien —

000308

11

KARL VIDEO

5/30 2:15 pm

From The Desk Of
Rama White Other

Printer

[redacted]

please wire today

could not be wired until 5/31

The Harman Press
1227 N. Highland Ave
LA. 90038

Wilshire Bank
4155 Wilshire
L.A. 90010
Acct# 01-504-150
routing - 122-038-374
phone: (213) 934-8222

our bank - call me back to confirm

000309

KARL VIDEO

From The Desk Of
Rama White

was wired 5/30

5/30/84 11:20 am

SK:

Steve Robbins would like [redacted] today to:
De France Printing
c/o Mitzubishi Bank, Mira Mesa Branch
9189 Mira Mesa Blvd.
San Diego, 92126
Acct. # 270-106-991 Routing # 90-923
Phone: (619) 566-5200

He also would like $8,000.00 wired to a different printer in L.A. (He will call back this afternoon with details) Today

Also, $3,000.00 (each) to two different printers tomorrow.

Let me know how you want to handle this.

Rama

Steve Robbins: (213) 850-6338

Authorize

000310

Karl Video Corporation, Newport Beach, California 714/645-7053

13

(paid/done 6/5/84

KARL VIDEO

Hart Camps:
Keith Glaser

From The Desk Of
Rama White

(415) 546-1221

① Posters for floor Demo.

The Grace Co. for Pres. China Basin Bldg. suite 363
c/o Hart St.
185 Berry St.
S.F. 94107

② Beach Balls w/ Hart for Pres.

Jack Nadel, Inc. #[redacted]
302 4th St. Oakland 94607
Attn: Karin Viets
"Hartbeat"
delegate magazine

③ typesetting
American printing #[redacted]
c/o Hart Camp.

④ Balloons & baseball caps
floor leaders

National Screen Print #[redacted]
000311 14648 Griffith St.
San Leandro, CA 94577
Att: Tom Murphy

14

KARL VIDEO

From The Desk Of
Rama White

date 7/3/84 To: Cathy

wired
$1500. F.I.B.
4th ¢

More Plastic Bags

000312

15

: SK- total = $11,775.35 sent 1/5/8

KARL VIDEO

(415) Keith
546-1221

From The Desk Of
Rama White

1. Frisbee's
Wing Aero
561st Central Ave
Richmond, CA 94804
Attn: Brian Shea
[redacted]

2. Tee shirts
National Screen Print
14648 Griffith St.
San Leandro, CA 94577
Attn: Tom Murphy
[redacted]

3. Mag. print
Warren's [redacted] Lawler Press
to Keith Glass @ Hart
[redacted]

4. Hekyum.
Kindel Graham

000313

KARL VIDEO

7/9

From The Desk Of
Rama White

Fed. Ex. today
also

1. (#2) Pens for delegate packette
Scotty Pens
to Keith Glaser @ Hart
#[redacted]

2. Pads (5,000 ea) #[redacted]
Blake Moffitt
Towne
to Keith @ Hart

3. Folders bal. → #[redacted]
[redacted] More plastic Bags
to Keith @ Hart

4. Tubes
Tubes & Cores, Inc. #[redacted]
to Keith @ Hart

000314

17

Total: 2,151."

KARL VIDEO

From The Desk Of
Rama White

Orig - 7/10/84 to Kevin @ Hunt for Pm

1. typesetting bill $355.51
American Printing Co.
(do Keith)

2. graphic supplies [redacted]
Debra Walker

3. posters (off convention) [redacted]
Contract Reproductions

000315 18

DEPOSITION EXHIBIT
KARL
16

KARL HOME VIDEO CORPORATION

899 W. 16TH STREET
NEWPORT BEACH, CA 92663
(714) 645-7053

#8123

INVOICE

SOLD TO
American's With Hart
507 8th St. S.E.
Washington D.C. 90003
ATTN: James Dwynell

SHIP TO

Invoice
14205

09-6210-0-010 95520.42

ORDER DATE	SHIP DATE	SHIP VIA	P.O. NUMBER	SALES PERSON	TERMS	DUE DATE

ORDERED	SHIPPED	✓	BACK ORD.	STOCK #	DESCRIPTION	UNIT PRICE	TOTAL
					HART FOR PRESIDENT CAMPAIGN		
					Video production services for commercials **January 31**		$17,000.00
					Video production services for commercials **March 1984**		$18,000.00
					Video production services for commercials **April 1984**		$25,000.00
					Video production services for commercials **May 1984**		$22,000.00
					Rally production **May**		$13,520.42

930435 4703

SPECIAL INSTRUCTIONS

2.11.84

SUB TOTAL	00030
FREIGHT	
TOTAL	$95,520.42

GARY HART
WASHINGTON, D.C.

October 10, 1986

Ms. Rama White
Karl-Lorimar Home Video
17942 Cowan
Irvine, CA 92714

Dear Rama,

Enclosed is a check in the amount of $9,600. This check is forwarded per the debt settlement agreement between Karl Home Video and Americans with Hart. Please pass it on to Stuart and the book-keepers.

Thanks.

Best wishes,

Richard Wagner

Deposited to SLIS account.

930435047 04

United Bank Center, 1[redacted]roadway, Denver, Colorado 80274

630019 23-7/1020

United Bank of Denver

National Association

Cashier's Check

Purchase of an indemnity bond will be required before any official check of this Bank will be replaced in the event it is lost, destroyed, or stolen

Date 09/29/86

Pay To The Order Of KARL HOME VIDEO CORP $ ******9,600.00

********9,600*DOLLARS AND*00*CENTS

Americans With Hart, Inc.

Gilbert Lee Romero

Authorized Signature

⑈630019⑈ ⑆102000076⑆ 010 479⑈

930435047705

005541

3

GARY HART
WASHINGTON, D.C.

RECEIVED
AUG 19 1986

Have Jim Brown look at before sending

August 14, 1986

Dear Stuart

Enclosed for our regular settlement form. After your review please process if you agree w. the one proposed. It would be best for someone besides yourself to see the signatures

Stuart, as always, we are most grateful for your kind help.

Sincerely

M. La Duke

930435047706

005545

4

GARY HART
WASHINGTON, D.C.

August 14, 1986

Karl Home Video Corporation
17942 Cowan
Irvine, CA 92714

Dear Sir or Madame:

This letter is a formal offer of settlement by Americans With Hart, Inc. to meet its current obligation to you.

Enclosed please find a debt settlement agreement which indicates the terms available for settlement of your account. If you agree with the settlement offer and return a signed copy of the form to our office we will forward a check to you to meet the settlement terms.

Federal Election Commission Regulations require that any debt settlement by a federal candidate committee entered into with a corporate creditor is subject to review by the Commission. This debt settlement form will protect you from any question that the settlement constitutes a prohibited corporate contribution to a federal candidate.

Americans With Hart, Inc. sincerely appreciates the patience you have already extended, and it is our hope that you will accept this settlement offer. The committee has debts of approximately $2.8 million, and the opportunity to raise funds through fundraising events continues to decrease with time. We hope that you understand our situation and realize that we have made every possible effort to repay all of our debts in full.

Should you have additional questions, feel free to contact me at your convenience.

Sincerely,

S. J. Van Hove

Scott J. Van Hove

PLEASE RETURN TO:
Americans With Hart, Inc.
P.O. Box 75356
Washington, DC 20013

930435047707

005546

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of Americans with Hart, Inc. Debt Settlement	COMMITTEE NO. C00159251

DEBT SETTLEMENT AGREEMENT

1. Pursuant to 11 C.F.R. 114.10(c), Americans with Hart, Inc. (AWH) and Karl Home Video Corporation (Vendor) hereby enter into a debt settlement agreement and request Commission approval of the same.

2. AWH's current obligation to Vendor is: $96,030.42.

3. This obligation was incurred for: TV production and travel/subsistence.

4. Being unable to meet its obligation to Vendor, AWH offers, and Vendor hereby agrees to accept, the following as settlement in full for AWH's outstanding obligation to Vendor: $9,600.00.

5. Vendor verifies that the initial extension of credit to AWH was commercially reasonable and that it has taken all commercially reasonable steps to collect the full amount owing.

6. This agreement is conditioned on approval by the Federal Election Commission.

FOR VENDOR:

Name:
Title:
Date:

FOR AMERICANS WITH HART, INC.:

Michael R. Moore
Treasurer
Date:

9304357708

005547

6

Karl Home Video Corporation

95,520.42 @ ~~12/31/84~~ 1/31/55

3/1/85 Invoice Attached AJVH

8/14/86 spoke w/ Simon re: 10% settlement — he agreed it was justifiable — letter sent AJVH

10/5/86 filed settlement form

~~Untitled~~

9304357029

From the Desk of: **TIM BROWN**

Stuart - 1-16-86 RHM.

The only problem I see with this is that Hartle debt to Karl Home Video Corp was assumed by you personally when the company was liquidated. Therefore, the agreement should be between Americans with Hart and Stuart Karl (not KHV, Inc.) Taxwise, this will result in a capital loss of $86,430, that you can deduct on your 1986 tax return.

Tim

005544

9304350047110

E

DEPOSITION
EXHIBIT
KARL
17

– said not what
Fleischmann Fund Inc.
to ask those two
it was

9304350047111

KARL HOME VIDEO

From The Desk Of
Stuart Karl

SK #

1. Rodo 3rd A #6 -
(2) 5000 Dixon

Bill Oliva

9304335047112

Karl Home Video, Newport Beach, California 714/645-7053

GARY HART
WASHINGTON, D.C.

received
2-25-85

Feb. 17, 1985

Copy

Stuart -

This is one hell of a way introduce myself!

Jim Barnett told me some good news and asked me to drop the attached in the mail. He suggested that it could be re-typed there on appropriate letterhead as discussed.

May I please ask that on this matter you use my home address of 230 F St., N.E., Washington, D.C. 20002.

On more important matters, I understand you will be here in March. & I greatly look forward to meeting you.

With best wishes,

Bill D.

930435 47113

LEGAL RETAINER and NON-COMPETITION AGREEMENT

I hereby retain William P. Dixon as attorney-at-law for the purpose of rendering legal and financial advice regarding domestic and international financial investments, banking law, and related matters.

I agree to pay a retainer of $~~20,000~~ 10,000 for Dixon's advice and counsel for the period of February 1, 1985 through December 31, 1986, in equal amounts of $~~10,000~~ 5,000, the first payment being due upon execution of this document, and the second payment due January 1, 1986. Dixon agrees not to render legal or financial advice to any other business or individual engaged directly in competition with during this period.

I understand that applicable conflict of interest laws and rules of the United States Government place restrictions on certain activities by Dixon, and I agree that I shall not request, and acknowledge that Dixon shall not perform, any services that are inconsistent or in conflict with any official Government duties of Dixon. I further acknowledge that Dixon's legal services pursuant to this Agreement shall not be performed to any extent whatsoever during regular office hours of any Government office in which he is employed.

It is agreed that Dixon's services are not being retained or compensated on a hourly basis. It is further agreed that since the payments pursuant to this Agreement [illegible] compensation for Dixon's

9304357147

advice on legal matters which because of their complexity, novelty, and potential financial return may require expertise, judgement and experience which Dixon possesses, and since Dixon agrees not to render legal or financial advice to competitors during 1985 and 1986, the payments pursuant to this Agreement do not entitle the client to any minimum amount of Dixon's time and Dixon shall determine in his sole judgement the amount and frequency with which he will render such service during 1985 and 1986.

I acknowledge that I have read and received a copy of this Agreement.

Jan 19, 1985 — William P. Dixon

William P. Dixon, Attorney

December 26, 1984 — [signature]

Client

9304355 4715

Karl Home Video, Inc.
A Lorimar Company

899 West 16th Street
Newport Beach, California 92663
Telephone (714) 645-7053

Letter OK.

✓ $5,000. - Due to Mike 4 days D. 3/22/85

February 28, 1985

Mr. Bill Dixon
230 F Street, N.E.
Washington, D.C. 20002

Dear Mr. Dixon,

Enclosed please find the Legal Retainer and Non-Competition Agreement.

If this letter is satisfactory, call me at (714) 645-7053 and I will have a check Federal Expressed to you at that time.

Thank you.

Sincerely,

Rama White

Rama White
Executive Assistant to the President
Karl/Lorimar Home Video

RW:lk

Enclosures

930435 47 16

From th[redacted].
WILLIAM P. DIXON

rec'd
3-4-85

March 5

Dear Ms White,

Many thanks for your assistance.

I am enclosing an executed copy of the Agreement for your records.

I look forward to seeing Mr Karl if he visits Washington later this month.

Sincerely,
Bill

9304353 7717

Freshmen Fund Inc.
899 W. 16th Street
Newport Bch., CA 92663

LEGAL RETAINER and NON-COMPETITION AGREEMENT

I hereby retain William P. Dixon as attorney-at-law for the purpose of rendering legal and financial advice regarding domestic and international financial investments, banking law, and related matters.

I agree to pay a retainer of $10,000 for Dixon's advice and counsel for the period of February 1, 1985 through December 31, 1986, in equal amounts of $5,000, the first payment being due upon execution of this document, and the second payment due January 1, 1986. Dixon agrees not to render legal or financial advice to any other business or individual engaged directly in competition with Freshmen Fund, Inc during this period.

I understand that applicable conflict of interest laws and rules of the United States Government place restrictions on certain activities by Dixon, and I agree that I shall not request, and acknowledge that Dixon shall not perform, any services that are inconsistent or in conflict with any official Government duties of Dixon. I further acknowledge that Dixon's legal services pursuant to this Agreement shall not be performed to any extent whatsoever during regular office hours of any Government office in which he is employed.

It is agreed that Dixon's services are not being retained or compensated on a hourly basis. It is further agreed that since the payments pursuant to this Agreement are compensation for Dixon's advice on legal matters which because of their complexity, novelty, and potential financial return may require expertise, judgement and experience which Dixon possesses, and since Dixon agrees not to render legal or financial advice to competitors during 1985 and 1986, the payments pursuant to this Agreement do not entitle the

9304353718

client to any minimum amount of Dixon's time and Dixon shall determine in his sole judgement the amount and frequency with which he will render such service during 1985 and 1986.

I acknowledge that I have read and received a copy of this Agreement.

Stuart Kaf

Will P. Dix-

William P. Dixon, Attorney

~~Client~~

9304355 7719

KARL PRODUCTION - CHECKING

		1	2	3	4	5	6
			TRANSFERS TO OTHER	CHECKS			
		DEPOSITS	ACCOUNTS	WRITTEN	INTEREST	S. CHGS	BALANCE
1	2/28/84	BAL FWD					2959.
2	3/30	S. Chg				6 -	2899.
3	4/30	"				75	
4	5/25	DEP. DAVID STEIN	30000 -				
5	5/25	S.C.				10 -	
6	5/29	DEP. TRS FROM KAC	22000 -				
7	5/31	S.C.				630	
8	5/25	ZIMMERMAN Gal Onty		22000 -			
9	6/29	" "		30000 -			27229

930435307720

DEPOSITION EXHIBIT KARL 18

EXHIBIT 3
MUR 2583

1/25/88

DEPOSITION EXHIBIT
KARL
19

December 4, 1986

Visual Expressions
PRODUCTIONS

RECEIVED
DEC 5 1986
STUART KARL

Mr. Stuart Karl
Karl•Lorimar
17942 Cowan
Irvine, CA 92714

Dear Stuart,

I have been considering for several days the impact of the present production on your agenda for the campaign. I have come to the following conclusions:

1. Gary perceives this as your production, he does not know specifically who is doing what. In these cases he usually does not want to know because it invovles excessive in-kind type arrangements. Beth Smith was his point person and in his mind she definitely has failed. Gary allows these types of things to go so far under their own steam and then gets involved and gets his people on them. At this point I am not sure where he considers you, that is something you can better judge.

2. Gary's desire and understanding for this biographical video is that it be shot documentary style, where he does not have to act and where the lines come from almost a stream of consciousness on his part. It is my opinion that to do this someone like yourself has to have the understanding with Gary that it will require a considerable time commitment on his part. He told me that no one asked him for more than that afternoon on his schedule, while Lee insisted that it was always two days as far as she was told. It seems that the staff, more often than not, still tells Gary what they expect he wants to hear and then try to work out the diferences some where else.

What you may want to do in the future.

1. Who did you make the arangement with to produce this show? It should have been directly with Bill Dixon and there is where you should ask the questions like: Is this somthing Gary wants to do and is he commited to .... (what ever you feel you need from Gary to get this done right)? This will allow you to get Dixon's support and allegiance. You are making a tremendous commitment in both your time and funds and they do appreciate it. I spoke a bit with Dixon last Monday and he acknowledged how important he felt you were to the effort.

2401 Main Street
Santa Monica, CA 90405
213 392-8300

9304353 7211

2. The money to some extent puts you definitively in the driver's seat until the show is completed; then the success of the video will drive your future abilities. I do not see any way that you will not be seen as the responsible party for this project. I just hope that it is not in anyones agenda to nail you at this point in time. I can assure you however that you are wrestling with the toughest tiger that exists in Presidential politics, it seems that since media controls pretty much the big picture, that every one has their eye on the position to control the media and since you have put yourself squarely in that position, it is only a matter of time before you will get your supporters on one side and those out to replace you on the other. In talking to Gary and listening to what he is saying to others it is for sure that he has put Dixon squarely in control of his operation and it is there that I would seek alliance at this point. I have always told Dixon how helpful and sincere you were in the past and to what extent you have made things available to get the job done, as well as keeping both he and Gary informed of your successes in the video business.

2. With this project as well as future ones you must personally take the time to insure the proper politics have been covered, I believe in cases such as this people get only one opportunity, two at best, and if things do not meet staff expectations it becomes very difficult to keep the staff support on your side. I know that because of your business commitments it may be difficult for you to spend the amount of effort to keep these projects politically on track, and I also believe that you may be better off in the long run being one step removed by placing a trusted person, someone like Steve Rivers or myself (if you feel comfortable, although to tell you the truth right now I would like to be with you and have a little distance but that is not right either. The answer is, to get in there, get everything squared away, and produce a magnificent video for the campaign while coordinating all the political elements along the way. You and I both know, that is a job very few people can do.)

For this project I will donate any and all of my facility and equipment, and personnel where it will help you.

I have written this over a period of days while certain events have transpired. You, most likely, have worked all this out with Gary, in the mean time.

Best regards,

Douglas Rosen

9304353 7222

DEPOSITION EXHIBIT
KARL
2nd

COMPLETE PRODUCTIONS
PRODUCTION COSTS RELATING TO
GARY HART "NEED PROJECT"

PAID TO	DATE	CHECK NO	AMOUNT
L.A. FILMWORKS	11/4/86	96	10,000 —
✓	11/6/86	101	5472.73
✓	11/24/86	119	40000 —
✓	12/24/86	139	15000 —
TOTAL - L.A. FILMWORKS			70472.73
MCKAY DAINES	11/12/86	107	1600 —
✓	12/17/86	136	5376.20
TOTAL - MCKAY DAINES			6976.20
BETTMAN ARCHIVES	12/12/86	133	1105 —
GOOD-LEE TRAVEL	12/17/86	135	799 —
DENNIS WALTO - PER SEPARATE SCHEDULE			6500 —
GRAND TOTAL			95,948.63

002433

930435347223

DENNIS WALTO

PAYMENTS RECEIVED FROM COMPLETE PRODUCTIONS

RELATING TO G HART VIDEO

PAYEE	DATE	CHK NO	AMOUNT
DENNIS WALTO	11/17/86	137	1450 -
✓	12/09/86	138	750 -
TOTAL FOR 1986			2200 -
DENNIS WALTO	1/[illegible]/87	147	1500 -
✓	2/2/87	15[illegible]	1500 -
✓	2/12/87	176	1300 -
TOTAL FOR 1987			4300
GRAND TOTAL			6500

NOTE - 1099-MISC FORMS WERE ISSUED FOR BOTH YEARS, REPORTING GROSS AS NON-EMPLOYEE COMPENSATION.

OU2431

930435347224

STUART KARL

MISCELLANEOUS 1986 CHECKS APPEARING TO BE GARY HART - RELATED

PAYEE	DATE	CHECK NO.	AMOUNT	
McKAY DAIMES	10/31/86	577	1900 -	HART VIDEO
[illegible]	10/[illegible]/86	578	66700	M Daimes, A. Con. FA

062451

9304335347225

NATIONAL BANK OF WASHINGTON

(NBW)

LOAN APPLICATION AND INSTALLMENT NOTE

Full Name (Last, First, Middle): HERRERA, EDWARD B.

Birthdate: 1/25/62

Present Street Address: 5027 E TANGO CIR.

City: ANAHEIM State: CALIF. Zip Code: 92807

Years there: 4 (four) Telephone: (714) 970-8190

Social Security No: 572-19-4661 Drivers License No. V8021727

Present Employer: KARL-LORIMAR Years There: 1 (one)

Employer's Telephone: (714) 474-0355

Employer's Address: 17942 COWAN ST. IRVINE CA. 92714

Present Salary or Commission: $ 1500.00 per MONTH

Have you previously received credit from National Bank of Washington ? NO

Personal Checking Account No.: 0108003856

Institution and Branch: WESTERN EMPIRE SAVINGS & LOAN IRVINE CA.

Savings Account No.: 10801017-4

Institution and Branch: WESTERN EMPIRE SAVINGS & LOAN, IRVINE CA.

	Credit Cards	Acct. No.	Name in which card is held
1.	DISCOVER	6011 0002 8350 3161	EDWARD B HERRERA
2.			

(PLEASE COMPLETE AND SIGN THE REVERSE SIDE)

005572

6

9304350 47226

PURPOSE OF LOAN

This consumer loan is for use by borrower in any lawful manner as he or she deems fit, and neither National Bank of Washington nor any other institution with which it may deal with respect to this note shall limit the use of the loan proceeds. The disbursement instruction made by the borrower in the following paragraph, however, will be honored by National Bank of Washington.

DISBURSEMENT INSTRUCTIONS

National Bank of Washington is authorized to disburse the Loan proceeds as follows -- to:

AMERICANS WITH HART

(Name)

P.O. Box 75356, Washington, D.C. 20013

(Address)

INSTALLMENT NOTE

$1,000.00

August 13, 1986

FOR VALUE RECEIVED, the undersigned hereby promises to pay to National Bank of Washington, at 619 14th Street, N.W., Washington D.C. 20005, the principal sum of One Thousand Dollars ($1,000.00) together with interest thereon from the date the Loan proceeds are disbursed pursuant to the "Disbursement Instructions" (the "Effective Date"), at the rate of twelve percent (12%) per annum). Principal and interest shall be payable as follows:

(X) Twelve (12) monthly installments of $88.85

or

(X) Twenty-four (24) monthly installments of $47.08

The first (1st monthly) installment shall be due thirty (30) days following the Effective Date and each subsequent installment shall be due on the same day of each month thereafter until the entire amount of principal and accrued interest has been paid in full. Each installment when made shall be applied to the reduction of principal. The undersigned may repay, without penalty, all or any portion of the principal amount due on this note.

Should default be made in payment of any installment due under this note, the whole sum of principal and interest shall become immediately due and payable. Principal and interest are payable in lawful money of the United States. If any such action is instituted under this note, the undersigned promises to pay such as the Court may determine as attorneys' fees.

005573

(your signature)

Alameda, California

7

9304350 47727

NATIONAL BANK OF WASHINGTON

(NBW)

LOAN APPLICATION AND INSTALLMENT NOTE

Full Name (Last, First, Middle): [illegible]

Birthdate: 7/11/61

Present Street Address: [illegible]

City: [illegible] State: CA Zip Code: [illegible]

Years there: 1 Telephone: [illegible]

Social Security No: [illegible] Drivers License No. [illegible]

Present Employer: [illegible] Years There: [illegible]

Employer's Telephone: [illegible]

Employer's Address: [illegible]

Present Salary or Commission: $ [illegible] per [illegible]

Have you previously received credit from National Bank Washington ? N

Personal Checking Account No.: [illegible]

Institution and Branch: [illegible]

Savings Account No.: —

Institution and Branch: —

	Credit Cards	Acct. No.	Name in which card is held
1.	—	—	—
2.	—	—	—

(PLEASE COMPLETE AND SIGN THE REVERSE SIDE)

005568

8

9304350 47228

PURPOSE OF LOAN

This consumer loan is for use by borrower in any lawful manner as he or she deems fit, and neither National Bank of Washington nor any other institution with which it may deal with respect to this note shall limit the use of the loan proceeds. The disbursement instruction made by the borrower in the following paragraph, however, will be honored by National Bank of Washington.

DISBURSEMENT INSTRUCTIONS

National Bank of Washington is authorized to disburse the Loan proceeds as follows -- to:

AMERICANS WITH HART

(Name)

P.O. Box 75356, Washington, D.C. 20013

(Address)

INSTALLMENT NOTE

$1,000.00

August 1, 1986

FOR VALUE RECEIVED, the undersigned hereby promises to pay to National Bank of Washington, at 619 14th Street, N.W., Washington D.C. 20005, the principal sum of One Thousand Dollars ($1,000.00) together with interest thereon from the date the Loan proceeds are disbursed pursuant to the "Disbursement Instructions" (the "Effective Date"), at the rate of twelve percent (12%) per annum). Principal and interest shall be payable as follows:

(X) Twelve (12) monthly installments of $88.85

or

(X) Twenty-four (24) monthly installments of $47.08

The first (1st monthly) installment shall be due thirty (30) days following the Effective Date and each subsequent installment shall be due on the same day of each month thereafter until the entire amount of principal and accrued interest has been paid in full. Each installment when made shall be applied to the reduction of principal. The undersigned may repay, without penalty, all or any portion of the principal amount due on this note.

Should default be made in payment of any installment due under this note, the whole sum of principal and interest shall become immediately due and payable. Principal and interest are payable in lawful money of the United States. If any such action is instituted under this note, the undersigned promises to pay such as the Court may determine as attorneys' fees.

005569

(Signature)

, California

9

30435729

DEPOSITION EXHIBIT KARL 22

STEPHEN M. RIVERS

Breakfast meeting with Stuart Karl
June 18, 1986

1. Streisand meeting, Saturday 12:30 in Malibu
   - agenda
   - directions/transportation

2. Dennis Walto
   - schedule meeting
   - job description: SK duties/GH responsibilities
   - salary & expenses
   - Hart video?

3. NY next week
   - David Letterman
   - Will Kanteres
   - Bill Minter

4. Center for a New Democracy
   - $10,000 due

5. New Fonda video
   - shoot schedule
   - Sidney
   - what's needed by when

6. Jane & Tom's camp - video equipment

7. July schedule
   - Denver 7/12-13*
   - Wisconsin 7/18-20
   - Nantucket 7/12-27
     (DSCC event at Teddy's 7/25-26)
   - meetings to schedule

8. *Hart retreat/Denver
   - plane from NY or DC?

9. California campaigns
   - Garamendi/money
   - Gray Davis
   - Bradley
   - Rose Bird
   - Cranston

10. Pope, 1987 US trip

11. Misc.
   - Mary Louise Oates, L.A. Times
   - car phone

9304350047730

DEPOSITION EXHIBIT 23 KARL

GARY HART
UNITED STATES SENATOR

July 2, 1986

Dear Stuart:

I just wanted you to know what a great difference it made yesterday to have Dennis Walto at the scene of a major event. It increased Gary's confidence, improved his performance and generally made our entire operation run more smoothly.

Great idea on your part. Continued thanks for all of your assistance.

Sincerely,

Thanks!

Bill Shore

Mr. Stuart Karl
Karl-Lorimar Home Video
17942 Cowan
Irvine, California 92714

002341

RECE
JUL 7 1986
STUART KA

NOT PRINTED AT GOVERNMENT EXPENSE

9304350473 1

GARY HART
UNITED STATES SENATOR

July 15, 1966

RECEIVED
JUL 18 1986
STUART KARL

Dear Stuart:

Steve Rivers told me of your willingness to help Share Our Strength's hunger relief effort by following up on our contacts with Rolling Stone Magazine and US Magazine regarding publication of our public service ad. I just wanted you to know how much I appreciate your taking the time to help us out on this. As you know, it's a very good cause and one that Gary and I are strongly committed to.

It was great to see you in Denver last weekend along with Steve and Dennis who are rapidly becoming indispensable to the Hart operation. Hope life on Nantucket treated you well. See you soon. Thanks again.

Sincerely,

Bill Shore

STEVE RIVERS
DENNIS WALTS

Mr. Stuart Karl
Karl-Lorimar Home Video
17942 Cowan
Irvine, CA 92714

DEPOSITION EXHIBIT
KARL
24

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930435047332

MEMO

TO: STUART KARL, BILL DIXON, BILLY SHORE

FROM: DENNIS WALTO

RE: CHICAGO/ BUFFALO/ NEW ORLEANS ASSESMENT

DATE: 15 AUGUST 1986

The purpose of this memo is to bring to light a positive and negative assesment of Gary W. Hart's recent speaking engagements. For each visit I will look at; text vs. audience and presentation of the speech itself, as well as a general logistics overview (or underview in my case!).

CHICAGO/ CITIZEN ACTION

*Event: Address to Midwest Academy Retreat, Appx. 1500 Delegates

*Text: Overall excellent. Delivered the necessary strokes and challenges to an initially skeptical audience. A vast majority of delegates left the hall with a positive view of GWH's policies and persona. Ira Arlook (Ex. Director Citizen Action) and Heather Booth (President, Midwest Academy) seem to be supporters and should, for what its worth, be courted.

*Presentation: In the course of remarks by GWH, there were a group of statements refered to as the "Scandle Series". These 1 or 2 sentence observations illustrated a Regan Administration shortcoming, and were automatic applause lines (A.A.L.). This series of statements has the potential to really ignite a crowd and could result in a standing ovation each time. The key element in this sequence is learning to speak through applause. In Chicago, we allowed the audience to peak and return to silence before the next applause line. If we had spoken through the applause, never allowing the crowd to stop their acknowledgement, we would have built in an intensity level that would have resulted in a standing ovation following the "Stephen Biko..... Thomas Jefferson." A.A.L. that brought the house down in Baltimore (NAACP Convention). Also speaking through applause forces the orator to raise his/her cadence resulting in a more forcefull delivery.

In Chicago, our sound system was excellent. A crisp sound, good press feed and little or no feedback. Unfortunately, there were no cameras to record our event.

9304735

NEW YORK/ CUMD ISSUES FORUM

*Event: State Democratic Party Issues Forum; Economic Redevelopment.

*Text: Excellent text, difficult crowd, but when you play on the Govenor's home field you do not expect a Colorado welcome. The speech was technically very good. It was difficult at times to follow the international economic policy remarks. The audience seemed to listen attentively, but not quite get the message. The Strategic Investment Initiative is a winner. People buzzed about that afterwords. The national interest over special interest remarks are a well received theme.

*Presentation: Through a series of last minute negotiations both parties aggreed that a head table seating arrangement, not stage seating best suited the interests of all concerned. This immediately gave an informality to the setting and provided a good opportunity for GWH to "loosen his tie," following his remarks. Unfortunately a time shortage may have altered GWH's plans to utilize the detachable microphone and really turn some heads. I will continue, whenever appropriate to provide the Senator with this option and opportunity. The concept of utilizing the detachable microphone and roaming an audience is new and innovative in the political spectrum. It would furthermore shed GWH of any "aloofness" stereotype in the media. I feel its very important that GWH utilize this technique first, it seems too good an idea for a Babbit or Kemp to pass-up. We need to set the standard. This technique could easily be referred to as a "Hart Style Forum" in the future.

NEW ORLEANS:/ NATIONAL CONFERENCE OF STATE LEGISLATORS

*Event: Speech to Bi-partisan Delegation Appx. 3000 people.

*Text: Brief, but well tailored for the bi-partisan crowd. Remarks were accepted well and our text was interrupted several times by applause. (Kemp was never interupted). Our substance oriented speech was not unexpected but perhaps a little of the unexpected would have loosened the crowd up a bit. (Gov. Edwin Edwards spent 20 min. telling jokes and 5 on a text, and they loved him) We could have used a little humor to break to break the ice, but again our time constraints were imposing.

*Presentation: Overall we had a superior presentation compared to Kemp, an excellent visual (as seen on C-Span) showcasing the Colorado flag, and an excellent sound system. A teleprompter would have really iced the cake here. GWH's cadence was good and his tone forcefull. A smile and raising of the eye-brows following a question is our trump card- I had several comments on how good GWH looks when he smiles.

9304354734

OVERALL ASSESMENT

Logistically the swing was very strong. Timing was precise and schedules were tight. We ended up catching the three departure planes by a total of 10 min. Not bad!

Our organization in each area was exceptional. Its quite a change from 1984 where things were thrown together. These people are organized and hungry. They all get an A+.

In the words of Brigham Young: "Thats all for now."

DMW/dl

9304350473735

KARL·LORIMAR
HOME VIDEO™

DEPOSITION EXHIBIT
KHL
26

From The Desk Of
John Lutgens

EK

[illegible] please note
that Denise is requesting
reimbursement for produce
and that all meal receipts
are [illegible] not the
required credit card receipts

002551

JL

9304350047336

KARL-LORIMAR HOME VIDEO EMPLOYEE EXPENSE REPORT

(A)
NAME DENNIS WALTO
DEPARTMENT
SIGNATURE Dennis M Walto
MANAGER APPROVAL
DATE 7 July 1986
FROM 24 JUNE 86 TO 7 July 86

(B) ADVANCES

DATE	AMOUNT
0	0
TOTAL	0

BEGINNING BALANCE 0
ADVANCES (B) 0
TRAVEL (C)
BUSINESS (D) 0
ENDING BALANCE

PAID
AUG 8 1986
CK # 201

005530

TRAVEL (C)

DATE	AIRFARE	MEALS	LODGING	TRANSPORT.	ENTER	TELE.	MISC	TOTAL	DESCRIPTION
6-24				14.00				14.00	TAXI FARE
6-24				14.00				14.00	"
6-25		22.00						22.00	DINNER
6-25				13.50				13.50	TAXI
6-26				15.00				15.00	TAXI
6-26		29.87						29.87	DINNER
6-27				5.00				5.00	GAS
6-30				3.00				3.00	PARKING
7-1		24.50						24.50	DINNER
7-1				6.00				6.00	PARKING
7-2				8.00				8.00	GAS
7-2				15.00				15.00	CAB
7-2		18.50						18.50	DINNER
7-3				5.00				5.00	GAS
7-7				10.00				10.00	GAS
TOTAL						TOTAL:		203.37	
								201.37	OUT-OF-TOWN EXPENSES / GAS

9 3 0 4 3 5 4 7 3 7

FROM 6[illegible] HILLANDALE

TO RUSSELL LONG BLG

RECEIVED FROM _____

FOR _____

AMOUNT $14.00 DATE JUNE 24 TIME _____

DRIVER John Nelson VEH. NO 511

THANK YOU!

946-0306

9304335047738

002553

—TAXICAB RECEIPT—

DATE 6-24 19 86

REC'D FROM _____

FARE AMOUNT $ 14.00

TRIP FROM SENATE RID (Long)

TRIP TO BETHESDA NID

ASSN. _____ CAB NO. _____

I.D. NO. _____

SIGNATURE _____

47 002555

THE FORMS WORKS, INC. HYATTSVILLE

9304350 47739

002554

DATE 6-25 AMOUNT $22.00

9304335 47740

002556

FROM Pete A.

TO Ben Roth

RECEIVED FROM _____

FOR _____

AMOUNT 13.50 DATE 25th TIME _____

DRIVER JM VEH. NO. _____

THANK YOU!

9304350 47741

002557

TAXI DRIVER'S CUSTOMER RECEIPT

Date: 6-26-86

Time: _____

Company/Ass'n: Dennis Mylon

Cab No. # _____ ID No. 45020 Tag No. 7354

Origin of Trip: _____

Destination: _____

Fare: 15.00 Tip: _____ Total: _____

Signed: Dennis Mylon

9304335 47742

002558

1069 31ST Street N.W.
Washington, D.C. 20007
(202) 965-MOON

CHECK NO
27440
DATE
AMOUNT
$2937

930433504774 3

02559

ca 4-Ge

Thanks for buying CHEVRON

00952432 6743391

ARTHUR MITCHEL 2
2[illegible] LINCOLN AV

ORIGINAL INVOICE—
RETAIN FOR YOUR RECORDS

SUPREME
CUSTOM

X
Customer's Signature

Total

Customer's Copy

9304335 47444

002560

PARKING

9304350 47745

002561

SABATINO'S

901 FAWN STREET
BALTIMORE, MD. 727-2667
727-9414

DATE 8-1 AMOUNT 24 50

9304335 47746

00256

9 3 0 4 3 5 4 7 4 7

002563

RETAIL SALES RECEIPT

SOLD TO

CASH

All consumer credit sales reflected on this form are made pursuant to the Retail Installment Credit Agreement terms previously furnished you by Mobil. Bank card sales are subject to the terms of your bank card agreement.

CUSTOMER COPY

Mobil MOBIL OIL CREDIT CORPORATION

K5392402

SOLD BY

PRODUCT OR SERVICE	QTY.	PRICE	AMOUNT
MOTOR FUEL GRADE: ____ ☐ LEADED ☐ UNLEADED			
REPAIR ORDER #			
PRICES INCLUDE APPLICABLE FEDERAL & STATE EXCISE TAXES		SALES TAX	
TOTAL AMOUNT AGREED WITH AMOUNT IMPRINTED AT TOP		TOTAL	

FCO 85-1-84

CUSTOMER SIGNATURE X	
AUTH CODE ▶	SALESMAN
AUTO TAG NO	STATE
DRIVERS LICENSE NO	STATE

9304335 47748

002564

DATE 2-2-85

RECEIVED OF _____

THE SUM OF $ 15.00 SURCHARGE _____
FOR CAB SERVICE RENDERED

FROM LAX

TO [illegible]

CAB NO. 132 DRIVER [illegible]

Thank You Your Patronage is Appreciated Security items may be redeemed at our office at 1300 W Olympic Blvd Suite 303 Los Angeles Ca 90015 Phone 385-5397

LAX TO DOWNTOWN LOS ANGELES (Flat Rate)	**- $22.00**
LAX TO BEVERLY HILLS (Approx Fare)	**- $21.00**
LAX TO HOLLYWOOD (Approx Fare)	**- $22.00**
LAX TO WESTWOOD (Approx Fare)	**- $20.00**

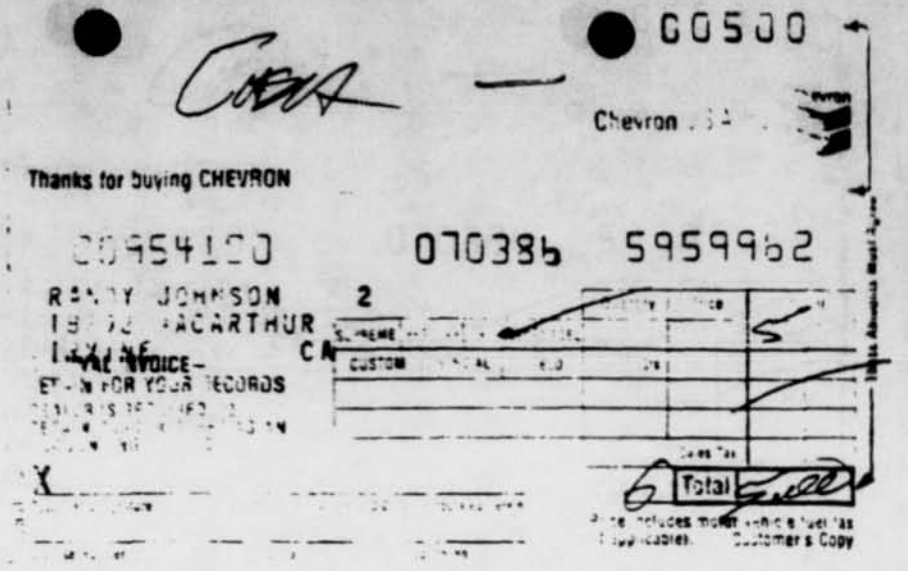
9304350 47749

002565

DATE	AMOUNT	
7-2	15.50	11450

9304350 47750

002568



930435047751

002567

1000

Chevron U S A Inc.

Thanks for buying CHEVRON

00942706 070784 6293840

MORRIS POULOAR I
301 LINCOLN BLVD
VENICE C1

SUPREME	REGULAR	UNLEADED	DIESEL	Quantity	Price	Amount
CUSTOM	SPECIAL					
					Taxes Tax	
					Total	

These Amounts Must Agree

X
Customer's Signature

Price includes motor vehicle fuel tax if applicable.

Customer's Copy

9304335 47552

002563

Hart Loan Papers

CS
Kim
Rm
Ed Herrera
JL
G. Hurst
J Nick
PL

Rama 8/22 11:25 ☐
Mr. Rick Reiter 859-6995

re: Gary Hart
applications ...

005567

SIGNED RP

X X ☐ ☐ ☐ ☐ URGENT ☐

9304354754

3

Stuart Signature

9304355 4755

NATIONAL BANK OF WASHINGTON

(NBW)

LOAN APPLICATION AND INSTALLMENT NOTE

Full Name (Last, First, Middle): Middel, Rama Louise

Birthdate: 9-25-53

Present Street Address: 816 Farlington Dr. #30

City: Santa Ana State: Ca Zip Code: 92705

Years there: 4 Telephone: 474-0355

Social Security No: 560-04-2957 Drivers License No. F0532191

Present Employer: Karl Corinan Years There: 3

Employer's Telephone: (714) 474-0355

Employer's Address: 17942 Cowan Irvine, Ca 92714

Present Salary or Commission: $ 30,000 - per year

Have you previously received credit from National Bank of Washington ? no

Personal Checking Account No.: 1080032509

Institution and Branch: Western Empire S+L, Irvine

Savings Account No.: —

Institution and Branch: —

	Credit Cards	Acct. No.	Name in which card is held
VISA 1.	Atlantic Financial	4121 [illegible]	Rama L. Middel
VISA 2.	Citibank	5424180 [illegible]	Rama L. Middel

(PLEASE COMPLETE AND SIGN THE REVERSE SIDE)

005570

4

9304355 047556

PURPOSE OF LOAN

This consumer loan is for use by borrower in any lawful manner as he or she deems fit, and neither National Bank of Washington nor any other institution with which it may deal with respect to this note shall limit the use of the loan proceeds. The disbursement instruction made by the borrower in the following paragraph, however, will be honored by National Bank of Washington.

DISBURSEMENT INSTRUCTIONS

National Bank of Washington is authorized to disburse the Loan proceeds as follows -- to:

AMERICANS WITH HART
(Name)

P.O. Box 75356, Washington, D.C. 20013
(Address)

INSTALLMENT NOTE

$1,000.00

8-12-, 1986

FOR VALUE RECEIVED, the undersigned hereby promises to pay to National Bank of Washington, at 619 14th Street, N.W., Washington D.C. 20005, the principal sum of One Thousand Dollars ($1,000.00) together with interest thereon from the date the Loan proceeds are disbursed pursuant to the "Disbursement Instructions" (the "Effective Date"), at the rate of twelve percent (12%) per annum). Principal and interest shall be payable as follows:

(X) **Twelve (12) monthly installments of $88.85**

or

(X) **Twenty-four (24) monthly installments of $47.08**

The first (1st monthly) installment shall be due thirty (30) days following the Effective Date and each subsequent installment shall be due on the same day of each month thereafter until the entire amount of principal and accrued interest has been paid in full. Each installment when made shall be applied to the reduction of principal. The undersigned may repay, without penalty, all or any portion of the principal amount due on this note.

Should default be made in payment of any installment due under this note, the whole sum of principal and interest shall become immediately due and payable. Principal and interest are payable in lawful money of the United States. If any such action is instituted under this note, the undersigned promises to pay such as the Court may determine as attorneys' fees.

Lena Mitchell
(your signature)

005571

Fresno, California

5

2304359247757

DEPOSITION EXHIBIT 1240 E-7

DENNIS WALTO

STUART KARL PERSONAL CHECKS TO OR FOR THE BENEFIT OF D WALTO - 1986

PAYEE	DATE	CHECK NO.	AMOUNT	EXPLANATION PER CHECK REGISTER
CASH (PER DENNIS WALTO)	7/22/86	183	1700 -	TRIP EXPENSES
DENNIS WALTO	9/4/86	297	1300 -	—
✓	9/4/86	298	24961	—
✓	9/16/86	376	600 -	ADVANCE ON WEST TRIP
✓	9/16/86	377	156 -	REIMB FOR SEPT T-O
✓	10/13/86	509	1000 -	CASH FOR TRIP
CASH (DENNIS WALTO)	10/29/86	526	575	REIMB FOR TELEREGISTER
✓ (DENNIS WALTO)	11/19/86	674	200 -	CASH FOR EXPENSES TO DEN-DC
DENNIS WALTO	11/26/86	778	800 -	12 PAY CHECK
✓	11/26/86	781	765 -	EXPENSES
✓	12/8/86	201	20337	—
✓	12/12/86	245	200 -	—
✓	12/26/86	455	26594	—
SUBTOTAL			$71402	
Budget Rent a Car	10/8	511	17444	HOTWIRE DENNIS WALTO
Exec. Tower Inn (Dennis Walto)	11/26/86	720	76877	—
TOTAL FOR 1986			965775	

00432

9304335347558

DEPOSITION EXHIBIT
KARL
25

000094

1 or 2 left

FRIENDS OF
GARY HART
1988

7 Oct 1987

Dear Stuart:

I use this stationary because I seem to have alot of it lying around, and it doesn't seem to be usefull. I hope things at C-H are going well and again If I can ever be of use don't hesitate to give me a call. We still haven't gotten together to play golf, but I do appreciate your keeping the lease on the Chevy going. I'm not one to speak of what could have been - but it was really too much fun to just Thanks Again -

Like You! ☺

Dennis Wolff

1600 DOWNING STREET
DENVER, COLORADO 80218
(303) 894-1988

Paid for by Friends of Gary Hart 1988

87, 86, 85, 84 .....

Москва. Здание Моссовета.

Куда STUART KARL 495
KARL · LORIMAR
17942 COWAN
IRVINE CA 92714
Кому USA

Индекс предприятия связи и адрес отправителя

Индекс предприятия связи места назначения

Stuart -
A FASCINATING PLACE -
GREAT POTENTIAL MARKET
FOR HOME VIDEO. THE FEMALE
COMRADS HERE COULD SUCK
BLOOD FROM THE WORKOUT.
See you soon.
Stu

Москва. Вид на Кремль со стороны Москвы-реки.
Moscow. A view of the Kremlin from the Moskva River

АВИА
PAR AVION

Stuart -
Steve Rivers & I have had
some interesting escapades -
and have found the
Workout Book and Video
in some very unexpected
places!
See you at the end of the
month. Doug Wilson

Stuart Karl
17942 Cowan
Irvine, Ca 92714
U.S.A.

Stuart - We're off to the
local video store this morning
to check on sales of the Hard Workout.
See you soon.
SM

These guys are a real PAIN.
Dixon

© Издат. «Прогресс». Москва 1986. Тип. «Красный пролетарий». Зак. 1677. Тир. 36700 ФН644 Цена 10 коп

DEPOSITION
EXHIBIT
Karl
29

000068

9304435 47760

GARY HART
UNITED STATES SENATOR

OCT 27 1986
STU

October 21, 1986

Dear Stuart:

As you remember, last year's trip to Asia had to be cancelled because of the Senate session in December. We had planned to re-schedule the entire trip for the end of this year. However, because of time constraints, we're now planning only one Asian stop this December -- in Seoul, Korea, for the second Pacific Rim conference. The conference begins on Wednesday evening, December 10, and concludes on Saturday noon, December 13. We're planning a brief R&R stop in Hawaii following the conference.

You and Debbie are again invited to join Gary, Lee, Martha Keys and me. Please let me know as soon as possible if you're planning to come along; if so, I'll send you details on the Seoul conference and on our travel plans.

Stuart, I also wanted to take this opportunity for a long overdue thanks for enabling Steve Rivers to come with me to Moscow. He's terrific, and made the trip much more enjoyable for Bill Dixon and me.

All here send best regards. I look forward to hearing from you soon.

Sincerely,

Doug Wilson

Mr. Stuart Karl
Karl Lorimar Home Video
17942 Cowan
Irvine, CA 92714

NOT PRINTED AT GOVERNMENT EXPENSE

9304350047611

MEMO

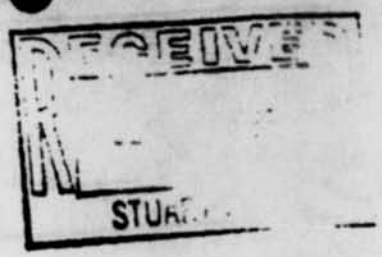
Stuart -
FYI

9304435 47662

STEPHEN RIVERS

000061

September 3, 1986



To: Stuart
From: Rivers

1. I got my visa and will be leaving Friday night for the USSR. I hook up with Dixon and Wilson in London Sunday a.m. We arrive in Moscow that afternoon and are there until Wednesday morning. I arrive back in NY Wednesday afternoon (attached is a copy of my flight itinerary). I'll call you when we get back to NY with a full report.

2. Attached are a couple of clips on Kathleen and Joe Kennedy's campaigns. We need to get the invitation letters out right away for your event on the 23rd. I think we have to hit people up for a minimum of $100 per person, and we should raise $10,000 total (that's an event minimum in a congressional race). You and Debbie can both contribute up to $1000 each, and I can make a contribution if you want.

   Let me know how you want to proceed on this.

3. Streisand -- anything new?

4. What happened last week with Medavoy, Zimmerman, Hart, etc?

5. Do we have dates, etc. for the other fundraisers you were talking about for Davis, Cranston?

I will be in my office all day Thursday and from 6am-Noon Friday. Please give me a call when you have a chace so we can touch base. Thanks.

9304350476763

THE GOOD LIFE TRAVEL
4570 CAMPUS DRIVE, NEWPORT BEACH, CA. 92660 ● PHONE (714) 756-1400

PRINTED IN U.S.A.

INVOICE

SALES PERSON: RC ITINERARY/INVOICE NO. 0005078 DATE: 26 AUG 8[illegible]

[redacted]

FOR: RIVERS/STEPHEN MR

05 SEP 86 - FRIDAY					
AIR	LV LOS ANGELES	555P	TRANS WORLD	FLT:760	SPCL COACH
06 SEP 86 - SATURDAY					
	AR LONDON HEATHROW	1200N	NON-STOP	BREAKFAST	
07 SEP 86 - SUNDAY					
AIR	LV LONDON HEATHROW	950A	BRITISH AIR	FLT:710	BUSINESS
	AR MOSCOW SVO	445P	NON-STOP		
10 SEP 86 - WEDNESDAY					
AIR	LV MOSCOW SVO	900A	PAN AM	FLT:65	COACH CLASS
	AR NYC KENNEDY	115P	1-STOP	LUNCH	
AIR	LV NYC KENNEDY	OPEN	TRANS WORLD	FLT:OPEN	COACH CLASS
	AR LOS ANGELES				

AIR TICKET/S TW7864016938	FOR RIVERS STEPHEN MR	
	BILLED TO AX372830065801011	2,698.00
	SUB TOTAL	2,698.00
	LESS AMOUNT	2,698.00-
	TOTAL AMOUNT	.00

000063

CUSTOMER COPY

INVOICE

TO

INVOICE

DATE

9304335047665

paid by SMR 9/3/86

C

THIS INVOICE REPRESENTS AN IMMEDIATE TRANSFER OF FUNDS FROM OUR AGENCY TO THE PARTICIPATING CARRIERS UPON ISSUANCE OF TICKETS. YOUR PROMPT REMITTANCE WILL BE APPRECIATED.

000064

MEMO

SEP - 4 1986

9/3/86

Stuart:

Attached is the bill for my hotel in Moscow on the Hart advance trip.

I paid the bill and need to be reimbursed.

Thanks.

- Reimbursed on 9/5/86 W-C Check included

STEPHEN RIVERS

930435 47666

000065

INVOICE

TOUR DESIGNS, INC.
510 H STREET, S.W.
WASHINGTON, DC 20024
(202) 554-5820

TO: Mr. Steve Rivers
Director of Public Relations
Fonda Films
914 Montana Avenue
Santa Monica, CA 90403

INVOICE Nº 3315

DATE 25 August 1986

RE: STEVE RIVERS -- 7-10 September 1986 USSR Tour

7-10 September	3 Nights, 1st Class Single at Hotel Rossia in Moscow Includes Breakfast Daily & Transfers	$324.00
Telex Fee		5.00
USSR Visa Processing		25.00
	FULL PAYMENT DUE IMMEDIATELY	$354.00

THIS INVOICE REPRESENTS AN IMMEDIATE TRANSFER OF FUNDS FROM OUR AGENCY TO THE PARTICIPATING CARRIERS UPON ISSUANCE OF TICKETS. YOUR PROMPT REMITTANCE WILL BE APPRECIATED.

000066

THE GOOD LIFE TRAVEL

4570 CAMPUS DRIVE, NEWPORT BEACH, CA. 92660 ● PHONE (714) 756-1400

INVOICE

[redacted]

Rama - This is for your records.

000067

GARY HART
COLORADO

UNITED STATES SENATE
WASHINGTON, D C

[3-21-85

DEPOSITION EXHIBIT KARL 30

March 13, 1985

Dear Stuart,

Lee and I hope you will join us at a weekend retreat in California on April 26th, 27th, and 28th. This will be the opportunity I have been looking forward to since the 1984 campaign ended: to spend time with you and a select group of others whose support, advice, counsel and understanding we will treasure always.

All of us recognize the importance of spending more time together without hubub and distractions as we begin to plan for the future. I want to spend this relaxed, quiet time listening to your thoughts and ideas about where the Party and our country must be headed.

The retreat will take place in southern Orange County. We will pursue both a political and social agenda. Our several serious discussions will take place at a ranch. Socially, we will be spending our time at the Ritz Carlton Hotel and an adjoining beach club.

000699

9304350047669

NOT PRINTED AT GOVERNMENT EXPENSE

I sincerely hope your schedule permits you to join us and that we can come together that weekend to develop a better sense of understanding and cooperation for the challenging months ahead. Also, it's about time we had a little fun.

Mike Novelli, chief financial officer of Americans with Hart, will be contacting you in the next few days to discuss the weekend in more detail. Please give Mike any thoughts and suggestions you have regarding the agenda.

Once again, I look forward to spending the weekend with you. Thanks for all you have done for me. I greatly value your friendship.

Sincerely,

Gary Hart

HOPE YOU AND
DOUG CAN JOIN US.

9304350047770

GARY HART
WASHINGTON, D.C.

received
4-2-85

CC ✓ 4-16-85 LK
Tuesday

March 29, 1985

Dear Stuart,

Gary and Lee are very pleased you will be joining them at our first "retreat." We are looking forward to this relaxing weekend where, in a beautiful setting, we may review ideas, activities, and plans of interest to us all.

Our activities will take place at two sites. One is the Monarch Beach Ritz-Carlton Hotel and Beach Club situated in southern Orange County a short distance from San Juan Capistrano and San Clemente. The other is Rancho Carillo, a forty minute drive up into the mountains from the Ritz. The ranch will be partially utilized for lodging and Saturday's business meetings. More details are provided in the enclosed three-day agenda.

Before going any further, I want to take this opportunity to thank our most generous host, David Stein. The Monarch Beach development is a magnificent project developed by David. All of our activities, food, and lodging (except for those staying at the Ritz-Carlton) will be provided through David's gracious hospitality.

For your information, I have enclosed flight schedules from your home city to the Orange County Airport. You will also find ground transportation and lodging information.

I encourage you to read through the enclosed information. We would request that you let us know as early as possible your arrival time at the Orange County Airport as well as any reservations you may need at the Ritz. If you have any questions, please contact Melissa Cloud in my office.

Again, we are most pleased you will be joining us. We are anticipating a stimulating and fun weekend.

Sincerely,

Mike

Michael P. Novelli

000706

311 Massachusetts Avenue, N.E., Washington, D.C. 20002 • (202) 675-9000

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Flights

We have enclosed flight information from your local airport to the Orange County Airport. This is the closest airport to the Ritz, and the only one from which we can provide ground transportation. Incidentally, the drive from the other "area" airports, Los Angeles and San Diego, ranges from one and one/half to two hours, depending on the time of day.

We request that you inform us of your flight plans as soon as possible in order for us to coordinate ground transportation.

Transportation

All of our transportation needs over the weekend will be satisfied by a chartered bus, a small luxury bus, and two limousines. This includes all Orange County Airport pickup and delivery and shuttles between the Ritz and Rancho Carillo.

Lodging

We will be utilizing two separate sites for lodging. Some will overnight in the wooded, mountainous seclusion of Rancho Carillo. This setting is totally rustic and situated in the Cleveland National Forest. The facilities include bunkhouses and trailers. Our business meetings will be conducted in what was once the Ranch's barn.

Due to space limitations at Rancho Carillo, some participants will be staying at the lovely new Ritz•Carlton. Room rates are:

$115 - Sunday through Thursday

$150 - Friday and Saturday

These facilities might be better suited for couples and those not desiring the more rustic accomodations of Rancho Carillo. Please let us know your accommodation requests within the next ten days so that we may plan accordingly.

Thursday arrivals are encouraged to stay at the Ritz that evening. Anyone wishing to play eighteen holes of golf on Friday should plan on arriving in time for a 1:00P.M. tee time (a 2:00P.M. tee time is recommended for those wishing to play only nine holes). All cart and green fees will be compliments of Stein Brief Group.

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AGENDA

FRIDAY:

Ritz & Beach Club	A.M. & Early P.M.	Arrival, golf
Ritz & Beach Club	6:30 P.M.	Cocktail Reception Dinner
Ranch & Ritz		Overnight

SATURDAY:

Ranch	8:00A.M.	Breakfast
Ranch	9:00 - 11:30A.M.	First General Meeting
Ranch	12:00 Noon	Luncheon
Ranch	1:00 @ 3:00P.M.	Small Group Meetings
Ranch	3:30 @ 5:00P.M.	Small Group Meetings
Ranch	7:00P.M.	Western Cookout & Entertainment

SUNDAY:

Ranch	8:00 @ 8:30A.M.	Farewell Gathering
Ritz	9:30 @ 10:30A.M.	Brunch & Final General Meeting
Beach Club	10:30 @ 12:00A.M.	Boat Ride
Ritz	12:30P.M.	Departures

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RETREAT AGENDA

Friday evening:		
6:30 - 7:30	Cocktails	Monarch Bay Club
7:30 - 9:30	Dinner	Monarch Bay Club
9:30	Shuttle departs for Ranch and Ritz	
Saturday A.M.:		
8:30	Shuttle departs Ritz for Ranch	
9:00 - 9:30	Continental Breakfast	Ranch - Barn
9:30 - 11:30	General Session	Ranch - Barn
	Introduction of Senior Staff and Martha	
	Remarks:	
	. Bill - Theme & Organization	
	. Billy - Scheduling & Politics	
	. Mike - Fundraising	
	. Martha - Center for a New Democracy	
11:30 - 1:00	Lunch	Ranch - Barn
Saturday P.M.:		
1:00 - 2:30	General Session	Ranch - Barn
	Open discussion with Gary	
2:30 - 6:00	Recreation	Ranch
6:00 - 7:00	Cocktails	Ranch - Pool
7:00 - 9:30	Western-style Cookout & Entertainment	Ranch - Pool
10:00	Shuttle departs for Ritz	
Sunday A.M.:		
8:00	Shuttle departs Ranch	
8:30	Shuttle departs Ritz	
9:00 - 10:45	Boatride with Continental Breakfast	
11:15	Departure - Gary and Lee	
11:15 -	Free time	

9304350 47774

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9304355 4775

GARY HART
COLORADO

UNITED STATES SENATE
WASHINGTON, D C

RECEIVED
MAY 2 1985
STUART KARL

April 23, 1985

Dear Stuart and Debbie,

Lee and I are delighted that you will be joining us in May for the 'Derby' weekend. I know we will have an enjoyable time ¢ for once we will be watching a horse race rather than running in one.

A member of my staff, Richard Wagner, will be contacting you soon regarding accommodations and the weekend's schedule.

Lee and I look forward to seeing you in Kentucky.

Sincerely,

Gary Hart

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DEPOSITION EXHIBIT
KARL
37

GARY HART
WASHINGTON, D.C.

RECEIVED
APR 30 1985
STUART KARL

April 27, 1985

Mr. Stuart Karl
Karl Lorimar Home Video
17942 Cowan
Irvine, CA 92714

Dear Stuart,

Doug Rosen asked that I send along a copy of the schedule for the upcoming 'Derby Weekend.' I know that Gary and Lee look forward to the Derby, and I expect Debby and you will have a fine, memorable time.

Sincerely,

Richard Wagner

PS Sincere thanks to you, Pamela and Linda for all your help this past Friday.

930435 047777

000710

122 C Street, N.W., Suite 360, Washington, D.C. 20001 • (202) 879-HART

DERBY WEEKEND SCHEDULE
May 2nd - 4th, 1985

Thursday, May 2nd

7:00PM — Governor's Ball, Governor's Mansion/Frankfort
+ 7PM cocktails
+ 8PM dinner
+ 9PM dancing
+ Dress: black tie/gowns or cocktail dress
+ depart at leisure

Friday, May 3rd

10:45AM — DEPART Capitol Plaza Hotel/Frankfort
+ Dress: for the morning and afternoon, comfortable, sportcoats and ties, jackets or sweaters and skirts

11:30AM to 12NOON — Spendthrift Farms/Lexington
+ tour

12:30PM to 2:00PM — Three Chimneys Farms/Midway
+ tour and lunch

3:30PM to 5:00PM — Churchill Downs/Louisville
+ running of the Kentucky Oaks

6:15PM to 7:30PM — Capitol Plaza Hotel/Frankfort
+ time for a bit of rest and a change into evening clothes

8:00PM to 10:00PM — Coach House Restaurant/Lexington
+ dinner with the Harts
+ Dress: black tie/gowns or cocktail dress

10:30PM — Anita Madden's party/Lexington
+ depart at leisure

Saturday, May 4th

8:00AM to 11:00AM — Governor's Breakfast, Governor's Mansion/Frankfort
+ arrive and depart at leisure

11:15AM — DEPART Capitol Plaza Hotel/Frankfort

12:30PM — ARRIVE Churchill Downs/Louisville
+ 111th running of the Kentucky Derby
+ Dress: Comfortable. For men, sport coats and ties. For women, jacket or sweater and skirt. One of the traditions of the Derby is for women, if they wish, to wear hats.

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DEPOSITION EXHIBIT KARL 32

Hart ex-aide tied to donation scheme

6297N

Karl assistant, others identify '84 fund chief

By Michael A. Ledrovich, Joan O. Pasco and Larry Peterson
© 1988, The Orange County Register

Gary Hart's 1984 national finance director told Newport Beach millionaire Stuart Karl how to disguise illegal contributions to the Hart campaign and knew that those donations were being hidden from federal officials, say Karl's former chief assistant and three other sources familiar with the fund raising.

Douglas Rosen of Los Angeles began advising Karl, 36, in late 1983 on how to raise the funds and conceal them, said Abraham Kantzabedian, who worked closely with both men while employed at Karl Home Video from 1983 to mid 1985.

Rosen oversaw Hart's 1984 campaign effort that raised $9 million and was active in helping Hart find contributors in a continuing effort to pay off a $2.2 million '84 campaign debt that now stands at $1.1 million.

Although Rosen has held no official title with the candidate's 1988 effort, Hart officials said Rosen was one of Hart's active California supporters until he temporarily dropped out of the presidential race last May after revelations about his relationship with Miami model Donna Rice.

As Karl's right hand man at Karl Home Video, which eventually became Karl Lorimar Home Video, Kantzabedian was the chief assistant in charge of finances and said he knew that Karl had arranged to funnel thousands of dollars of illegal contributions into Hart's 1984 effort.

"I'm the dirty laundry of the Hart campaign. I've kept quiet long enough. The truth needs to come out," Kantzabedian said in an interview with the Register on Tuesday. "Rosen told Stuart how to raise the money and hide the money. Stuart was pressured by the campaign to come through with the bucks."

Rosen, reached in Los Angeles, denied the allegations.

Kantzabedian said Karl was told by Rosen how to raise and disguise the funds. He said he personally delivered $5,800 in computer equipment from Karl for Hart's Los Angeles office and paid for three leased automobiles for Hart campaign workers. Rosen also helped disguise Hart campaign expenses paid by Karl into a company fund for a never completed video about Hart, Kantzabedian said.

Kantzaedian also said he was a

B Please see KARL/12

"I'm the dirty laundry of the Hart campaign. I've kept quiet long enough. The truth needs to come out. Rosen told Stuart how to raise the money and hide the money. Stuart was pressured by the campaign to come through with the bucks."

Abraham Kantzabedian
Chief financial assistant to Stuart Karl from 1983 to mid 1985

"I've worked for Gary Hart for 15 years and we don't do that. I am not involved, nor is anyone else on the Hart campaign."

Douglas Rosen
Gary Hart's 1984 national finance director

MORE →

ORANGE COUNTY REGISTER
JANUARY 29, 1988

FEC: Re: Hunt
MUR: 2583.
4/2/88

EXHIBIT 26

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FROM 1

passenger on [redacted]-chartered Learjet flights during 1983 and 1984 during which Rosen was ferried to Hart campaign appointments. Karl paid about $30,000 for these trips, Kantzabedian said. The trips included a flight to John Wayne Airport from the 1984 Democratic convention in San Francisco in July, and a $14,000 round-trip flight from John Wayne to Washington, DC, in May 1984.

Kantzabedian said he used his first and middle names — Abraham Levon — to bill the airplane charters on Karl's American Express card to conceal the trips.

"No one would identify that name with the Hart campaign," he said.

Hart's campaign reports for the period between July 1983 through July 1984, filed with the Federal Election Commission, do not list any in-kind contributions from Stuart Karl under "individual contributions." The records do indicate that Karl had contributed a total of $1,000 — the maximum allowed — as of Nov. 29, 1983.

Rosen called all the allegations "preposterous" and said he had no knowledge of any illegal fund raising on behalf of Hart.

"I've worked for Gary Hart for 15 years and we don't do that," he said. "I am not involved, nor is anyone else on the Hart campaign."

Rosen said Karl was a fund-raiser and "Whatever Stuart did, he did. I didn't know about it."

Karl has been unavailable for comment.

Rosen acknowledged that he had flown on Karl's Learjet during the 1984 campaign but said it was a common practice for members of Hart's executive finance council to hitch rides on charter flights.

"A lot of members of the executive finance council had chartered planes and it was nothing to piggyback with them if they were going in your direction," he said.

Rosen said he did not know if the trips were reported to the FEC.

Kantzabedian said he was among 15 Karl Home Video employees who made a total of $12,250 in bogus contributions to Hart's 1984 campaign. The employee checks, collected by Karl and handed over to Rosen, later were repaid to employees in cash by Karl, Kantzabedian said.

During one such employee solicitation at Karl's Newport Beach office in February 1984, Kantzabedian said Rosen and Karl discussed the employee donations.

"Rosen said to Karl in the office, 'How is that (the employees) to be handled,' meaning the cash repayment to employees," Kantzabedian said. "Stuart said to Rosen, 'Don't worry, Rama (White Middel) is already taking care of it.'"

Middel, at that time Karl's executive aide, has told the Register that she reimbursed $30,000 to employees from Karl's personal bank account for contributions made to Hart and two other congressional candidates.

"I know Rosen knew about everything. I was there when Rosen had the conversations with Karl. I handled the billing for campaign expenses. Stuart told me what to do and told me Rosen wanted him to do it that way," Kantzabedian said.

Kantzabedian recalled another incident, late in Hart's unsuccessful bid to win the 1984 Democratic nomination, when the Hart campaign telephoned Karl with an urgent plea for $20,000.

"Stuart came out of his office and pounded his fist against the wall. He told me Rosen's people called saying they needed $20,000. It was a crunch and they had to have the money," Kantzabedian said. "Stuart was angry. He said 'What the (expletive) do they do with all that money I give them?'"

A source who attended several Hart campaign-finance meetings also confirmed that [redacted] and Karl had discussed illegal fund-raising. The source said the discussions took place during four private meetings held between 1983 and 1986.

The source, who spoke on the condition of being unnamed, said the meetings involved Karl, Rosen and Hart campaign strategists.

The first meeting took place in August 1983, after Rosen had obtained Karl's name from a list of Democratic activists.

"Doug told Stuart he needed his help with fund raising. Then he told us how we could check-swap (employees) and hide money," the source said. "We were reassured that everybody with Hart was doing it. Doug said other candidates had, and were doing it. There was no problem."

The source said methods discussed at the first meeting included:

- Using employees of Karl's video company as contributors and then repaying workers in cash. The Register has disclosed that Hart received $17,000 in such contributions for his 1984 and 1988 campaigns.
- Paying Hart's campaign expenses such as printing, materials, Learjet trips, limousines, rent-a-cars and parties and then listing the items as expenses of Karl Home Video.
- Masking other Hart campaign contributions as being connected with a for-profit home video, "Gary Hart: The Candidate," that involved Karl and Rosen.

Kantzabedian confirmed that all three methods were used by Rosen and Karl to conceal the money.

"They always talked in a sort of code. Rosen always was very careful about what he said. But since I was handling the financial records, video budgets and travel schedules, I knew what they were talking about," he said. "And at the end of the day, Stuart and I would sit in his office and he would tell me everything that was going on. I couldn't believe it."

Rosen said he was living in New York in August 1983 and never attended any meetings with Karl before Jan. 4, 1984, when he was named Hart's finance manager.

"On that date I became involved in the Hart campaign," he said.

Rosen denied ever talking to Karl about hiding contributions.

"That's an absolute lie. I didn't know of any funds being hidden from federal officials," he said.

Susan Casey, Hart's campaign manager, could not be reached for comment.

"I don't really have any response at all right now," said Bernie Schneider, general counsel for the Hart campaign. "We will wait unto it."

Schneider said he knew nothing of the alleged activities.

"I remember a guy named Abraham [illegible] who worked for Karl," he said. "I thought he was a driver."

Asked about how the allegations would reflect on the Hart campaign, Schneider said, "I don't know. I really don't have anything to say."

Schneider added, however, that he has begun questioning "Doug and all the other people connected with this." He said he has had "two or three" conversations with Rosen since The Miami Herald first published an account last week about alleged Karl-related campaign-finance irregularities.

"I'm trying to get to the bottom of the problem," he said. "That is all I have to say."

Kantzabedian said Karl had become enraptured with the glamour of Washington politics and the power of government after first meeting Academy Award-winning actress Jane Fonda, a political activist, and her husband, Tom Hayden, a Democratic state assemblyman, in 1982.

Karl had made millions through marketing the Jane Fonda Workout and Playboy home videos. He had contracted with Rosen's Visual Eyes Company to do post-production on the projects. Rosen has since sold Visual Eyes and has no involvement with the firm, company officials said.

"The Hart people were telling Stuart they would make him an ambassador if Gary Hart was elected president," Kantzabedian said. "I remember one day after Stuart had counted all the money he gave, he said 'I can't believe what it costs to become an ambassador somewhere.'"

Days after the August 1983 meeting, the source said there was a second fund-raising session in which Rosen brought along a "slew of Hart campaign people."

The source said the same topics were discussed between Rosen and Karl.

Rosen denied attending any meetings with Karl before 1984. When asked which Hart campaign people were dealing with Karl before 1984, Rosen said, "I don't know. I got Stuart's name off a (contributors') list."

Rosen said his involvement with Hart fund raising ended with the July 1984 Democratic Convention in San Francisco.

But Billy Shore, special assistant to Hart during the first Hart campaign and a key '84 campaign insider, said that Rosen was one of the California people involved in helping find contributors to pay off $2.2 million in debts for the '84 effort.

Shore also said Rosen later became a supporter for the Hart 1988 effort until the incident with Rice resulted in Hart temporarily quitting the race.

Sources said two more conversations took place about Hart's financial problem after the convention.

One conversation on methods to raise money to repay '84 debts was conducted during festivities at the 1985 Kentucky Derby at Churchill Downs in which the Rosen family had entered a horse named "Chief's Crown."

[redacted]

MORE →

Karl and his wife, Debra

The source said Hart was not included in that discussion

Rosen said Karl was his guest for the derby, but that no fund-raising meeting took place

"My horse lost. It was a post-mortem," he said. "There were no meetings."

Kanzabedian said he left Karl-Lorimar Home Video in July 1985 because of the pressure exerted by Karl and Rosen in the fund-raising efforts.

"I had a long talk with Stuart, friend-to-friend, and I told him something is wrong with all these c[illegible]ributions. I told him we re[illegible]ing with the government and that it was a heavy-duty game that I didn't want to play anymore," he said.

Kanzabedian said Karl shrugged his shoulders and told him, "I don't know what to say, all I know is that I've got to take care of it."

The Register previously has disclosed that Karl continued his fund-raising for Hart and for the unsuccessful 1986 congressional races of Kathleen Kennedy Townsend of Baltimore and Orange County Superior Court Judge David Carter.

Although no longer the Hart finance manager, Rosen remained in fund-raising. A former Karl-Lorimar executive said Rosen and Karl again discussed disguised Hart campaign money in the fall of 1986.

That conversation between Rosen and Karl was during a Learjet flight from Teterboro, N.J., to John Wayne Airport, according to the executive, who was on the aircraft and overheard the discus[illegible]

[illegible]Rosen and Stuart were discuss[illegible]ing the 1984 campaign debt on the way back to the coast," said the executive, who asked not to be named. "Stuart said to Rosen, 'Listen, I've hidden the campaign's indebtedness, but I ever going to get my money back?'"

The executive said Rosen assured Karl that he would be repaid and said, "You've done a great job to fund raising. We need you for more (financial) support from you."

The executive said Karl was concerned with his "[illegible]investment" in the Hart campaign.

Rosen said he was not involved with Hart in 1986, but then retracted the statement and said he might have held "a debt-retirement fund-raiser in New York."

He said he was on Karl's chartered Learjet, but it involved private video business, not the Hart campaign.

Former Karl-Lorimar employees have told the Register that Rosen maintained a constant presence at the Karl Home Video office in Newport Beach and later at the private office when the company became Karl-Lorimar in 1986. The business is defunct as of 1987.

"Rosen was a regular in Stuart's office. Every couple of weeks he would spend a few days at Karl-Lorimar that focused on the Hart campaign," said another former Karl-Lorimar worker. "When Rosen telephoned the office, he had the same status as the president of Lorimar — he was to be put right through to Stuart."

The Register disclosed last week that Karl employees had been pressured into giving a total of $12,250 to the 1984 campaign, and $4,500 in December 1986 in bogus contributions to Hart's 1988 campaign that were later were repaid in cash by Karl.

Rosen denied being active in the 1988 Hart effort before the Rice incident, but when told of Shore's statements, said, "I am participating [illegible] putting some things together."

He would not specify his role.

Karl and Rosen also were active in a project called "the Gary Hart video." Publicly, they told workers the video was a private venture that would be marketed for sale at video stores. Karl and Rosen said the project did not involve the Hart campaign.

But Kanzabedian and one other source involved with Hart fund-raising said the video was another vehicle that Karl used to conceal funds to Hart's campaign.

The Hart video crumbled after The Miami Herald disclosed Hart's relationship with Rice.

"It was a means to channel cash to the Hart people without anyone checking," the source said. "If the Hart video was a private venture, the FEC people wouldn't even look at it. Of course, it wasn't private. It was directly involved with the Hart campaign."

A former Karl employee who arranged flights for Karl in 1986 and early 1987 said Rosen flew four times with Karl in August and September 1986.

The employee said he did not know what transpired on the flights, but said Rosen was known as a key member of Hart's campaign. Karl paid for all of the flights, said the employee, who asked not to be identified.

However, an executive who was on the majority of flights was told by Karl that Rosen was making the trips as "Gary Hart's public-relations man."

Another Karl employee familiar with the workings of the executive office confirmed that Rosen was introduced to the staff as a member of Hart's campaign. She said the constant topic between Karl and Rosen was how to pay off the debt from Hart's 1984 campaign.

Register staff writer Robin Gotzian in Washington contributed to this report.

9304350 47811

GARY HART
COLORADO

UNITED STATES SENATE
WASHINGTON, D C

RECEIVED
OCT 21 1985
STUART KARL

DEPOSITION EXHIBIT
KARL
33

October 17, 1985

Dear Stuart:

Sometime in the first 90 days of next year I would like to get together for a weekend in Colorado with 10-12 trusted friends and advisors to discuss ideas about the management structure and the organization of a future national political effort. Given your own successful experience in business and management, I hope you'll be one of the handful of people to join me.

Between now and then, it would be extremely valuable to me if you would be willing to put on paper some of your thoughts regarding organizational structure, management and financing of a national campaign. I'd consider it a great personal service if you would be willing to draft a comprehensive memo in this regard, mark it "Personal and Confidential," and send it to me by December 15. Your help before the end of the year will enable me to take maximum advantage of the period available for planning in the months ahead.

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NOT PRINTED AT GOVERNMENT EXPENSE

Thanks in advance for your willingness to devote the time this important task deserves. I really need your help on this, and look forward to discussing it personally with you during a planning retreat weekend which Lee and I will be organizing in Colorado early next year.

Sincerely,

Mr. Stuart Karl
Karl Lorimar Home Video
17942 Cowan
Irvine, CA 92714

PERSONAL AND CONFIDENTIAL

THIS IS IN PREPARATION OF THIS MEETING WE DISCUSSED.

000897

9304357837

GARY HART
WASHINGTON, D.C.

January 20, 1986

Mr. Stuart Karl
17942 Cowan
Irvine, CA 92714

Dear Stuart:

Gary asked me to drop you this note as a reminder that he'd be very interested in receiving your thoughts - - in writing - - regarding the organizational structure, management, and financing of a national campaign.

As you know, we're planning a small strategy session for Winter Park, Colorado on February 21-22. To make this session a success it would be extremely helpful for Gary to have your memo by February 5 so he can review it carefully. Several of those invited to Winter Park have already submitted their memos and Gary has found their ideas to be extremely valuable.

Please mark your memo "Personal and Confidential" and get it in by February 5. I'll be sending along more details about February 21-22 shortly.

Sincerely,

Bill Shore

9304350047884

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122 C Street, N.W., Suite 360, Washington, D.C. 20001 • (202) 879-HART

G. STUART KARL, JR.

February 20, 1986

Dear Gary:

The next few pages the first rough draft on my campaign strategy approach concerning your upcoming election. I look forward to hearing your comments on these ideas and spending some valuable time exploring this over the weekend.

Regards,

Stuart Karl

9304350478785

MEMORANDUM

To: Gary Hart

From: Stuart Karl

Date: February 19, 1986

This is not an attempt to package a candidate, but to examine and plan out a communication scenario, to achieve an end result, the Presidency. It combines some time-proven systems used to sell consumer products. We will take the best of this system and personalize it. It also addresses people and the organization. People are the key ingredient to success.

We must also take an entrepreneurial approach to our campign to not only create an aura of enthusism, but of individual motivation, pushing down into the ranks of campaign workers, a drive to create and accomplish results intuitively and quickly...but all with the main goals and wishes of our candidate at heart.

Once our themes are indentifiable, we must begin the slow process of candidate identification with these themes to all entities in the country. We must expand beyond the traditional "off year" duldrums.

Like any plan, this plan is **dynamic, flexible** and most obviously, **open** for suggestions.

The campaign must have three phases:

Planning

There is no substitute for well thought out groundwork. Time is our enemy. A Presidential campaign is not like product positioning. You are allowed very few mistakes. Our time to plan is now.

Action Period/Groundwork

This is the investment period of the campaign that is between now and New

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Hampshire. This critical stage must be used to not only establish the credibility of the candidate, but his organization and campaign staff's integrity.

Reaction Period/Election Period

This is the quick pace reaction period that even with the best plan must be taken day by day. To make this issue intense period more tolerable the planning and groundwork period are critical.

PEOPLE ARE THE ORGANIZATION:

Planning Stage

Regardless of the candidates standing in the polls, the actual campaign organization must maintain an attitude of constantly "coming from behind" and never letting up. This passion can be developed and maintained as long as there is an open set of communication channels from top to bottom.

Early on, the formation of clear channels of authority and direction must be given and continually reaffirmed to all campaign workers. This will build confidence and allow for a more efficient decision making process. It will eliminate "second guessing". That can plague any organization. One major criticism of 1984 was lack of organization .

This structure, properly handled, will not hinder entrepreneurial efforts but foster them by allowing each individual a clear set of guidelines to work within. The campaign should work smarter, not necessarily harder.

PLAN OF ACTION FOR GARY HART:

1. Designate a clear campagin manager, who will handle political issues and direction and key political staff to run this portion of the campaign.
2. Create the role of campaign administrator to organize all administration, personnel, communication and fundraising activities.
3. Monthly, show visible support to the workers of his key staff via specific internal communication vehicle.
4. Allow mistakes to be a learning experience at first, promoting individual effort with reward, win or lose.

The focus and lessons learned in the planning and groundwork periods will expand

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just prior to the Reaction period to not only include campaign workers, volunteers and staff, but will also include contributors.

It is very important to illustrate immediately to contributors that a strong managment is in place and that the management supports its staff. This will create a confidence level fundamental to word of mouth fundraising efforts. The way the organization is run will in itself reflect the candidates ability to lead. It will become a microcosm of the country early on and a focus of national press. During the groundwork phase it will be assumed that volunteers will provide the bulk of the manpower as we set up for more extensive fundraising and the primaries.

To motivate this group, in addition to commiting to the above mentioned clarity of command, we must continue to have Gary address the organization (look backwards, as we may call it) with a basic organization theme.

GARY HART MOTIVATE AND COMMUNICATE THE FOLLOWING:

1. We are never ahead until the election is over.

2. Regadless of any poll, we must not breed or be arrogant, but be humble and thankful that people support us.

3. The people who work, contribute and volunteer are the essence of victory. The American public relates to hard work with reward. It is very difficult to reward financially in a campaign. A campaign newsletter needs to be created to be a spokesperson for Gary to these workers and contributors. This bi-monthly publication will grow to a monthly as we move forward to the primaries and the national press. It will allow people to feel in touch with the top. We can reward by profiling individual efforets and recognizing people. This brings the effort to a full circle. It will:

* Communicate from the top significant themes and directions to the people in the campaign and contributors.
* It will reward by recognition the people of the campaign.
* Promote the concept of a "tightknit" group.
* Represent to outside observers a well run campaign organization.
* Create press opportunities regarding organization and its staff. My suggestion would be to profile a cross section of workers, i.e., blacks, hispanics, yuppies, etc.).

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GROUND WORK

Within this period prior to New Hampshire, it is fundamental to:

A. Properly fund the campaign

B. Prepare computer modelling allowing for different circumstances

C. Communicate leadership themes to the staff and the nation

D. Develop "**Strategic Constituant Group**" leaders to communicate to various constituencies.

A. Campaign Fundraising needs a complete plan of its own and will be addressed separately.

B. Computer modeling - acting vs. reacting as a key need of the campaign.

Issues as diverse as political ramifications of votes, to statements made by Gary or about to be made, could be analyzed before or after by comparing polls to voter reaction (i.e., if Kennedy re-enters how will we react? How will the polls change?) This nerve center could be an invaluable tool to help the campaign keep ahead of itself. It could analyze a wide range of scenarios and help us set up a contingency plan accordingly.

COMMUNICATE LEADERSHIP THEMES

The citizens of the United States need a leader not a Democrat or Republican. In an effort to stand above trite political themes, or special interest groups, or we need to be responsible to all with basic themes. We must decide these early on and build from them. One basic here should be that Gary Hart is a leader not a politician!

The organization and fundraising also should encompass Republicans as well as Democrates in an effort to prove this.

STRATEGIC PEOPLE GROUPS

Gary Hart is not a candidate of special interest thus he is a candidate for all, we should though divide the nation into groups (to be mutually determined) i.e.

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Black, Hispanics, Jews, Catholics, Yuppies, etc. and tailor our overall themes to them.

A campaign worker should be assigned to each group to see that each constituency is properly being handled.

A plan of action needs to be developed for each group and we must identify:

1. Leaders of each group

2. Communication vehicles (i.e. key radio, newspaper, etc.)

3. Heroes of each group (i.e. stars)

This is a basic brand management philosophy used in consumer marketing. Proctor and Gamble is in essence a combination of various little companies. The sum of the parts equals the whole.

By tailoring our message, we will better understand the needs of these groups. These "Strategic Constituant Groups" will communicate with our computer modelling people analyzing scenarios to create a better understanding of anticipated moves and desires of these groups.

COMPETITION

One area the computer modelling department can monitor is our competition. This will allow us to keep tabs on:

1. Key supporters of other candidates.
2. Key political affiliations
3. Key Press, etc.

This should be communicated to the candidates and key staff via a weekly memo.

REACTION PERIOD

With the proper themes, and positioning Gary as a leader, we can win! During the primaries, we enter a re-action period. Our planning and groundwork will allow us to understand our competition, the voters and the issues, allowing us to react better.

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CONCLUSION

Gary Hart can win with **proper planning** and **hard work!** The nation needs a leader. The voters are concerned that the economy maintains growth. Gary must communicate his concern for fiscal responsibility. This will begin to attract the eye of the conservative element. As a leader, not necessarily a Democrat, (which may still connotate unions, etc.) he needs to lay out a plan for growth with social responsibility. Introducing social responsibility into the political environment has not been well received lately, (Reagan pushes for growth at any expense). Gary can create a balance of both. True Patriotism!

Gary, as a leader, can achieve this. Kennedy was a leader. Gary Hart is a leader!

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Albert H. Gersten, Jr.

19 March 1986

Mr. Stuart Karl
17942 Cowan Street
Irvine, CA 92714

Dear Stuart:

Enclosed please find the text of our initial rough draft regarding Revenue/Major Events. I'm sharing this text with you following the retreat at Winter Park. I'm interested in hearing any comments you may have regarding the enclosure.

Look forward to seeing your remarks on your assigned topic.

Sincerely,

Albert H. Gersten, Jr.

AHG/dd

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STUART KA

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HART CAMPAIGN

Revenue/Major Events

Intial Rough Draft

We must make every effort to raise the maximum amount allowed by the FEC. The maximum that can be spent during the pre-convention period is approximately $25,250,000 plus 20% fund raising costs. We need to raise about $30,300,000 less matching funds by May 31, 1988. Matching funds for the 1988 campaign will be assumed at 50%.

The Staff has estimated that about $4,000,000, plus fundraising costs, will be needed for operations in 1987. Most of that will be raised during 1987. Without a detailed budget in place, it will be assumed that the first half of 1988 will consume the remainder of the $30,300,000.

To raise $30,300,000, assuming 50% qualifies for matching funds, we must raise $20,200,000. If we assume that the time frame is January 1, 1987 through May 31, 1988, we have 17 months, or 74 weeks, or 517 days to raise this amount.

1,188,235 per month
272,973 per week
39,072 per day

While figures offered by Staff suggest only 25% of the 1984 funds were derived from events, our assumption here is that 75% of the 1988 campaign funds will come from major and minor events. This will include many smaller $10,000 - $25,000 stacked events to reach our fundraising goals. An example of stacked events might include four cocktail receptions which can be arranged on the same day, at locations within a 20-45 minute drive, at staggered times.

430 - 6:30 Cocktails*	Hart arrives 5 departs 5:45
5:30 - 7:30 Cocktails	Hart arrives 6:15 departs 7:00
7:00 - 9:00 Cocktails	Hart arrives 7:30 departs 8:15
8:00 -10:00 Event	Hart arrives 9:00 departs 10:00

*This event should be at a major law office, investment firm, et cetera.

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75%, of the total budget exclusive of matching funds, or $15,150,000 will need to be raised from fundraising events.

891,176 per month
204,730 per week
29,304 per day

While the ideal fundraising schedule for a month might consist of

12 events	2 hotel events	@200,000	400,000
	4 house parties	@ 65,000	260,000
	6 house parties	@ 50,000	300,000

A more typical month will probably include:

25 events	1 hotel event	@200,000	200,000
	2 hotel events	@100,000	200,000
	2 house parties	@ 65,000	130,000
	4 house parties	@ 50,000	200,000
	4 house parties	@ 25,000	100,000
	12 events	@ 10,000	120,000

Losing one major event @200,000 per month will dramatically increase the number of events necessary to reach our goals.

By mid 1986, state by state goals and strategies must be developed. For the early months of 1987 it makes sense to concentrate on states with strong illustrated support, trying later, to get support from the weaker states. Thus, the bulk of the first 12 months must come from a few key states:

California	3,000,000
Colorado	1,000,000
Texas	1,500,000
Illinois	1,000,000
Pennsylvania	1,000,000
Florida	1,500,000
Maryland	500,000
Massachusetts	500,000
Connecticutt	500,000
Washington DC	500,000

New York, which was strong in 1984 must be discounted because of the possiblilty of a Cuomo candidacy. However, in 1986, while Cuomo is ducking the Presidential label, contributors may be more freely persued.

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Elements involved in each state will vary depending on demographics, size, number of key cities, regional habits, et cetera. The funds, however, will raised from the following sources:

A. Hotel events: Dinners and/or receptions for 250 - 1000 people should net $100,000-$300,000, depending on the geographical location and organizational ability.

B. House parties: Events in private homes will net between $10,000 and $65,000, once again depending on geographical area and organizational effort.

C. Organizational events: Media events, rallies and grass roots fundraisers are primarily designed to generate press coverage, support for the candidate and raise the morale of the troops. These events are not generally considered as fundraisers. However, please see attached note.

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D. Concerts: The Hart campaign should capitalize on its access to the entertainment industry, and attempt to produce a concert on each coast with the goal of raising $500,000 at each event.

E. The Cabinet: Expected revenues are not available.

F. Miscellaneous: This category of major events includes telethons, walkathons, bicycle trips, large rafting or canoe trips on casual rivers, and other unusual events not yet specified.

Four strategic considerations demand maximum feasible front loading of fundraising, despite the truism that it will be easier to raise money during the heat of the campaign. Consequently, we recommend attempting to raise 5 million, excluding matching funds, during the first quarter of 1987 with a total of 15,150,000, including matching funds, for 1987 from all fundraising sources.

1. Political/Press - The Press will constantly evaluate the early Hart campaign on its ability to raise money. This is the only tangible evidence of organization they have to evaluate at this early stage. If we are capable of raising 5 million within the first Federal filing period of 1987, the effect will only

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further our ability to raise money by turning press doubts into accolades for the Hart organziations ablility to raise money.

2. Financial - Early monies placed in CD's obviously serves as substantial fundraisers themselves.

3. "New Face" buffer - Money in the bank will not only pre-empt some pretenders, it will serve as a buffer against temporary derailment by a new face. Should we be upstaged at any point, money will slow at least temporarily. This buffer established from the beginning will allow us to prevail.

4. Time - There is more time available for fundraising at this point than there will be later.

Major events around the country should be scheduled by fall 1986 for January, February and March 1987. These fund raisers should be primarily designed to tap previous Hart donors early, while continuing to broaden our base. While most of 1986 fundraising and recruiting will be targeted toward the deficit and 1986 operations cost, attention to these early 1987 events is critical. The Hart schedule for the last half of 1986 should target trips to 40 key cities at least once, but more likely twice to recruit additional key people and touch base with former supporters.

Sample Projected Fundraisers for January 1987

Tuesday	Jan 13	Dinner	Los Angeles	300,000
Wednesday	Jan 14	Dinner	Las Vegas	100,000
Thursday	Jan 15	Dinner	San Francisco	150,000
Friday	Jan 16	Dinner	Seattle	200,000
Saturday	Jan 17	Brunch	Sacramento	50,000
Saturday	Jan 17	Dinner	San Diego	50,000
Sunday	Jan 18	Dinner	Denver	250,000
Tuesday	Jan 20	Dinner	Chicago	
Wednesday	Jan 21	Dinner	Des Moines	
Thursday	Jan 22	Dinner	Boston	
Friday	Jan 23	Dinner	Manchester	
Saturday	Jan 24	Dinner	Atlanta	
Tuesday	Jan 27	Dinner	Miami	

January 28 to February 9 are devoted to pre-sale events for March fundraisers.

Tuesday	Feb 10	Dinner	Dallas
Wednesday	Feb 11	Dinner	Houston

et cetera...

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A prerequisite of these early fundraisers should be that the key sponsors absorb all related costs until the money for their event is in. This avoids taxing the campaign which has yet to raise Hart for President money.

Key Hosts/Sponsors and event coordinators should be determined at least 5 months in advance. In some instances, it will be possible to use capable, full time volunteers, in others, paid event coordinators will be required.

There may be some internal fear that this doesn't look like a grassroots campaign. THIS PROPOSAL IN NO WAY PRECLUDES A GRASSROOTS CAMPAIGN. In fact, the early money will allow us to purchase Hart "memorabilia" to raise more cash at the grassroots level.

Time demands of other critical campaign components will severely restrict the available time for fundraising as the campaign progresses. If we assume an average campaign day of 15 hours, allowing 9 hours for personal time, an average of 20% or 3 hours per day, 7 days a week, will be available for fundraising. On a more cautious note, we should anticipate losing one day a week to unforseen circumstances, leaving only 18 hours a week for event fundraising.

If we now assume 443 days (517 less 74), we must raise $34,200 each day, or approximately $11,500 each candidate hour devoted to event fundraising.

The frontloading proposal would allow a fundraising timeline as follows:

Jan - Mar	Apr - Aug	Sept - Nov
50% fundraising	20% fundraising	30% fundraising
50% all other	80% all other	70% all other
5,000,000 raised	3,000,000 raised	2,000,000 raised
2,500,000 matched	1,500,000 matched	1,000,000 matched

Dec - May
20% fundraising
80% all other
10,000,000 raised
5,000,000 match

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The last five months we will be responsible for nearly 10,000,000 plus 5,000,000 matching funds, or:

2,000,000 per month
465,120 per week
60,445 per day for a 7 day week
77,520 per day for a 6 day week

The $1000 maximum donation restriction makes it difficult to develop a program to cultivate major donors. In depth attention should be given to this problem.

The central staff should design a prototype of each event and supply it to each local Fundraising event coordinator. The central staff should identify and lock in place key volunteers or paid event coordinators in each state, city and region, who will be supplied with the masterplan.

One of the most difficult organizational tasks of the campaign will be the need to establish tight controls, and rapid and accurate reporting procedures without stifling the creativity that will emerge from a decentralized operation. Both are vital to the success of this mammoth undertaking.

In fundraising terminology,"Major Events" generally refers to dinners at hotels which can accomodate 500 to 1000 people in one seating, and, concerts, or sporting events held in large public facilities. By definition, a major event requires the technical ability to successfully coordinate a flow of schedules, deadlines and bodies over a period of 2-3 months for a dinner,or 6 months or more for a concert.

For purposes of this discussion we have considered a "house party" with a net to the campaign of $50,000 as a major event.

A cocktail reception in a private home which will reach the minimum net to the campaign and will involve the candidate for no more than one hour is a very useful fund raising tool. In major metropolitan areas it is possible to do "stacked" events at staggered times, aimed at specifically targeted universes. This type of event is relatively uncomplicated to produce, and can easily be administered by volunteers with a limited amount of supervision from the campaign staff.

On the other hand, a seated dinner in a private home which requires extensive rentals and catering is generally not cost effective. This type of event may generate the required amount of revenue, but the ratio of production cost to dollar received is so high as to discourage frequent application of this formula. This event is most effective when used sparingly, and/or where

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extraordinary costs may be kept to a minimum.

A major dinner, in a hotel, for a universe ranging from 500 to 1000, is traditionally prepared over a 3 month period and consists of 4 categorical time blocks:

1. Budget, location, theme & list approvals - 2 weeks
2. Solicitation of sponsors - 4 weeks
3. Production and dispersal of invitations - 2 weeks
4. Intensive calling to follow-up invitations - 3 to 4 weeks, depending on universe

Post-production time for an 800 plate dinner should be estimated at 5-7 working days.

It is possible to compress the pre-production time frame to 2 months by beginning with an approved budget and event format, and eliminating the sponsor letter approach. However, sponsors play an extremely important role in a dinner, as they are committed to sell or purchase a significant percentage of the projected gross. Theirlevel of committment is generally comensurate with the amount of time and interest invested in them by the campaign/candidate. Honorary sponsors (elected officials, community leaders, celebrities, et cetera) are equally important. If this phase of participation is eliminated, and sponsors are solicited by telephone, it is probably a good idea to follow up with a letter of thanks and enclosure card for them to return confirming their level of participation. A dinner "Kick Off" reception or meeting is also advisable, and should be attended by a member of the campaign staff or a surrogate who will not be involved in the day to day production of the event.

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MAJOR DINNER TIMELINE - 3 MONTH SCENARIO

1ST WEEK	Set date and secure location Determine universe Get budget approved Target sponsors
2ND WEEK	Create sponsor letter Get approval of sponsor letter text Generate and drop sponsor letter
3RD WEEK	Preliminary meetings with hotel, florist et al First meeting with graphic artist Print outside envelope Gather and collate lists from participants Begin sponsor letter calls
4TH WEEK	Complete sponsor letter calls Complete desing and get approval to print Go to print Begin addressing outside envelopes
5TH WEEK	Pick up final print run and stuff invitations Final check on invitation alphalist Bulk invitations to sponsors Second meeting with hotel Drop invitations
6TH WEEK	Prepare lists for inviation calling Clean lists as bad addresses come in
7TH WEEK	Begin calling sponsors re:table committments Continue cleaning lists
8TH WEEK	Begin calling on invitations using temps Continue cleaning lists Keep in touch with sponsors
9TH WEEK	Continue calling with temps Continue to clean lists
10TH WEEK	Continue calling Continue to clean lists Design program and get approval
11TH WEEK	Start confirmation calls Print program Create preliminary floor plan Preliminary arrangement of head table
12TH WEEK	Final arrangements with vendors Final head count to hotel Final seating, table charts and table sheets Dinner tickets EVENT

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MAJOR DINNER TIMELINE - 2 MONTH SCENARIO

1ST WEEK	Budget is approved Set date and secure location Target sponsors Print outside envelopes
2ND WEEK	Begin addressing outside envelopes Preliminary meetings with hotel Meet with graphic artist Complete design and get approval to print Gather and collate lists from participants Go to print with invitation
3RD WEEK	Complete sponsor calls Pick up final print run, stuff Final check on invitation alphalist Drop invitation.
4TH WEEK	Bulk invitations to sponsors Second meeting with hotel Prepare lists for calling
5TH WEEK	Begin calling on invitations using temps Clean lists as bad addresses come in Keep in touch with sponsors
6TH WEEK	Continue calling Continue to clean lists Design program and get approval
7TH WEEK	Start confirmation calls Print program Create preliminary floor plan Preliminary arrangement of head table
8TH WEEK	Final arrangements with vendors Head count to hotel Final seating, table charts and table sheets Dinner tickets EVENT

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A NOTE ON NON-MAJOR EVENTS

Key campaign components, other than fundraising, demand much of the candidate's time. Press in several media markets each day, grassroots events to mobilize supporters, travel, recruitment of key people, preparation, and personal time will all compete for the campaign's most valuable asset, the candidate's time.

Press events and grassroots events do not preclude fundraising. We should devote attention to ensuring that every possible gathering of people becomes a small fundraiser. We should attempt not only to gather names of workers at every rally, but raise money as well. Passing "Help Hart Hats" at rallies, selling pins, buttons, posters, bumper stickers, t-shirts, et cetera, will substantially increase our "take" at these events, but must be tightly organized.

Important revenues might be derived from the production of a Jim Dine "Hart Heart" poster, produced at $X and sold for $X plus 200%. (Jim Dine is a contemporary artist widely known for a series of "heart" lithographs.) We might also do seriagraphs or lithographs for major donors at a much higher price, if it is legal. Art for Hart.

Special limited edition pins of quality might bring similar mark-ups. We should have at least five or six different limited editions of 200,000. "Americans Take Hart", "The Hart of America", et cetera.

Autographed Hart first editions can be auctioned or used as door prizes. Coffee mugs may be reaching a bit, but with advanced preparation the merchandising of Hart "instant" memorabilia could generate $3-4 million. While these efforts will require very tight distribution and accounting systems, they will pay off. It may be wise to have a donor front the initial costs to be reimbursed from the sales on a monthly schedule.

Celebrities offer a huge potential draw, but are difficult to schedule. It would be advisable to make readily available the master travel schedule for Lee Hart, the Hart children and the Hart surrogates to facilitate using celebrities with them to increase the overall appeal of their events.

Direct mail offers the interesting prospect of dramatically increasing our percentage of matching funds. It is possible that the high costs involved in initiating a direct mail program could be offset by the fact that almost all contributions generated will be well below the $250 maximum matching limit.

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Retreat

+ cabinet discussion

Gary Hart
David Stein
1988 Campaign Strategy
February 5, 1986

Pursuant to your request I have prepared a memorandum outlining my thoughts regarding immediate and future efforts toward a 1988 Gary Hart presidential campaign. I have spent time refining my thoughts through discussions with Richard Wagner (while he was in Laguna), Paul Freeman, Rick Reiter and, of course, Chris Townsend. I would like to acknowledge our four friends for their input.

I have organized my thoughts around the following four key campaign elements:

- Management
- Money
- Messenger
- Message

I have written this as if it were directed to a third party. Somehow "he must..." sounded less presumptuous than "you must...".

I hope this memorandum will be of benefit to you. Although my greatest outward accomplishment in creating this document may have been its reduction in length from my initial 32-page draft to its present length, it has been a valuable process. The development of this document has proved to be an enlightening experience for me as well as the aforementioned "gang of four".

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Thank you for providing me with the opportunity to share my thoughts with you. Thank you, also, for creating a deadline for its completion. I would otherwise have re-drafted it another dozen times.

It was great to see you and Lee, Billy Shore, Bill Broadhurst, et al at the Superbowl. I look forward to seeing you Monday in San Antonio.

My best regards,

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GARY HART

1988

CAMPAIGN MEMORANDUM

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EXECUTIVE SUMMARY

Management. Management roles must be clearly defined and responsibilities delegated and decentralized. Campaign structure and operation should be inspired by the corporate model. As soon as possible, one individual - as chairman of an ad hoc task force comprised of key advisors with varied talents and experience - should be charged with developing by a date certain, a detailed business plan for orchestrating the campaign from start to finish.

Essential elements of the business plan would include:

- A budget
- An organization chart
- Job titles and job descriptions
- Campaign policies and procedures - for expenditures, personnel (recruitment, hiring, compensation, training, and job performance evaluation) internal and external communications, etc.
- The creation of a Board of Directors with regularly scheduled meetings

Board meetings, attended by Gary and accorded a high priority, can provide insight and coherence to management. Such meetings can also serve as an efficient conduit for transmitting information from the field to headquarters and, vice versa.

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The Board should be comprised of key advisors. Certain Board members should be designated as Hart surrogates for the benefit of the public, as well as campaign staff and supporters. Done effectively, surrogates on the Board can have credibility and relieve demands on Gary's time and travel. Moreover, motivation can be maintained at a high level.

The business plan should provide for standard operating procedures for certain mechanics (i.e. correct advance procedure, training, field organizing, recruitment of personnel, affirmative action, procurement of equipment, press relations, authorization requirements for the commitment of campaign funds). Specific procedures should be implemented whereby the organization accommodates those who can work only intermittently.

The perception that the Hart campaign is run effectively and efficiently - run "like a business" - should help the campaign recruit supporters and procure requisite resources.

Money. The campaign should devise a plan whereby the time Gary devotes to fundraising is minimized. The plan should emphasize that which Gary does well in fundraising and deemphasize that which he does not.

Gary should be used directly in group settings where he can show his command of issues and where he can express his political, economic and social vision. He should not be asked to ask for

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money, (don't attempt to make Gary Hart an Alan Cranston with pockets full of small change making fundraising phone calls at airports).

In "one on one" meetings with key individuals, Gary should share his vision and get to know the person. At the most, when comfortable he should ask for participation in his political efforts. Gary should <u>never</u> have to ask for money. On too many occasions Gary has been forced to ask his key "money" people for money. Their job is to ask for money not his! It is demeaning and a waste of our most important resource (no more conference calls where Gary is required to plead for money from his friends).

Any fundraising event should accomplish at least one purpose beyond fundraising. As an example, the "Hart National Cabinet" raises funds but also builds organization and communication among key supporters. Our direct mail should raise money but also promote Gary's vision and broaden our base of support in other than monetary ways.

Near the top of the finance agenda should be the pay off of debts owed to small businesses and individuals in Iowa and New Hampshire.

<u>Messenger</u>. The most important goal is to let Gary Hart be Gary Hart. Routine budgeting of "down-time" for Gary to relax and reflect is extremely important and an excellent investment of

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Gary's valuable time. Again, Gary is our greatest resource. We must use him effectively.

Message. Gary's message consists of both substance and tone. The major focus of this section is on the tone of Gary's message. His speeches, interviews, press releases, position paper, etc., should be positive, upbeat, constructive and future-oriented. Even when the target is Ronald Reagan and the audience is rank-and-file Democrats, stridency is not effective. In fact it is counter productive.

It is a mistake to portray a phenomenally popular President as evil. Those who have voted for Reagan may infer that you mean to say that they themselves endorse evil or that they are not smart enough to recognize evil.

We should concede that by some current measures we are in fact better off under the current administration. Whether the American spirit is high because of him or in spite of him matters little. We should articulate that a Hart administration will go a step further, strengthening the economy and our security while at the same time investing more in the future and in fairness. Conceding reality makes it easier to talk about complex issues and have the point absorbed by the listener.

Emphasize the major, positive aspects of Gary's political vision:

- A leader of new Democrats: True to Party principles but not wedded to programs of the past,

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interested in what works, not in ideology

- o Socially concerned: Seeking more efficient and more equitable ways to provide for the general welfare of the illiterate, sick, poor or disabled.
- o Pro Business: Supportive of "real" business (entrepreneurs, small and medium size business, the backbone of this nation's economy) not just "big" business (IBM, General Motors, the military industrial complex) and supportive of making our nation's businesses more competitive on an international basis.
- o Pro-Defense: Seeking a sound national defense, not just an expensive one, with a commitment to arms control.

It is dangerous to base the campaign on a theme. That theme may define Gary rather than the other way around. We have seen "new ideas" become "Where's the Beef"?

Crafting themes, deciding when to drop one to emphasize another is not unlike product advertising, wherein at some point one presumes the market is saturated with one message and, accordingly, it is time to move to another.

We should not put too much emphasis on "True Patriotism", like Reagan-bashing, it may be perceived to be insulting or condescending to the listener. A single theme is less important than

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finding economical and provocative ways of expressing Gary's vision.

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MANAGEMENT

Effective no later than January 1, 1987 a single, unified, and coordinated organizational structure should be in place. Each and every individual working on the campaign at that time should be able to clearly define their place within the organization. This point cannot be over-emphasized: A critical step in achieving a well-run campaign effort is to have each participant (full time or part time, paid employees or volunteers) understands his mission, to whom he reports, and by what measures he will be evaluated (in the form of tangible performance standards). Each person should have a clear and meaningful job title designation. This can serve to lessen friction and miscommunication.

The organizational structure should be a product of a detailed business plan. In order to implement the plan on schedule, development of the plan should begin immediately. The plan should be developed through an ad hoc, task force comprised of key advisors. The task force should have a strong representation of individuals with specific experience in business planning and business management.

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One individual should be designated as the director of this task force. This person should be responsible for development of the plan. I suggest that Bill Dixon be the task force chairman, if he can make the commitment of time and if there is not a legal conflict because of his Senate role.

Any attempt to set forth the details of the campaign business plan in this document would be premature. However, the following list describes in general terms certain essential elements:

- There should be a budget system developed. The system should include development, approval, revision and review criteria.
- There should be an organizational chart with job titles and job descriptions.
- There should be a Board of Directors which meets routinely in strict accordance with an established schedule.
- The national organization should be decentralized through the development of state and local subsidiary organizations. The national, state and local organizations should be structured so that they are compatible with each other in function, organization and reporting relationships.
- The working relationship between national, state and local elements of the Hart organization should be clearly defined.

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- The plan should provide a way to recruit and accommodate all manner of personnel, including those who are able to work only intermittently.
- Standard operating policies and procedures should be developed for personnel (recruitment, compensation, training, evaluation, moves, personnel additions, and changes, etc.), expenditures, budget variance, scheduling, Gary's advance requirements, press contact and all other concerns of a campaign with national, state and local organizations.

Regular Board meetings should be scheduled, Gary should attend these meetings except in the case of serious extenuating circumstances. The plan should provide for additional, non-traditional ways of facilitating the percolation of good ideas from the "bottom" to the "top" and vice versa. In this way, Gary can maintain that not only does he seek new ideas to help guide the nation into the future, but in fact he encourages new ideas within his own political organization during the course of a campaign.

Independent of the inherent virtues of a campaign business plan in terms of coherent management, there are other benefits, as well. The perception that the 1988 Gary Hart Presidential campaign is "run like a business" will be of significant importance in the campaign's efforts to engage successful businessmen to devote even more time and money than perhaps they otherwise

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would. Such individuals will be tremendously impressed with the infusion of business concepts and business analogies into the campaign. Thus, they will become more likely to contribute, because they will begin to view their contributions as a tangible investment as opposed to throwing money into the "bottomless pit" of a national campaign fundraising effort.

Tony Coehlo has been extremely successful (raising millions of dollars) in marketing the D.C.C.C. with his "businessman's" approach to the D.C.C.C.'s political organization and expenditures. Tony's opportunity to promote this approach is limited in scope compared to the impact that Gary can have through a presidential campaign with a strong "businesslike" structure and philosophy.

As part of the business plan, the campaign needs to identify certain ethics and philosophies that should be endorsed and promoted by campaign leadership, such as the following:

- In order to achieve Gary's campaign goals he will need to supplement the existing core group of talented people that comprise his staff and key supporters. There must be an attitude promoted among those currently involved to encourage new people to participate. Individuals cannot be protective of their own self-interest and cliques cannot be allowed to thrive or he will not be able to effectively broaden his base. The campaign

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must identify individuals throughout the country that it wants to recruit. It should assign the responsibility for the recruitment of those individuals to key people presently involved. This will be a lengthy process but should be started now and tracked on an ongoing basis.

- The campaign cannot afford "high maintenance" people. We should make this part of the Hart campaign credo so that it will be unpopular for anybody to take such an approach. Peer pressure can eliminate a lot of wasted effort.
- In order to conserve Gary's time for more effective use, the campaign should establish Gary Hart surrogates beyond Bill Dixon, Billy Shore, Lee Hart and Andrea Hart. It should identify people (such as Mark Hogan) who can motivate people, follow through with personal phone calls and personal notes of thanks, congratulations, etc. rather than Gary having to do it directly. This can only be done if the people believe the surrogate has direct access to Gary. The proposed Board of Directors can also serve in this capacity as a result of their creditibility and regularly scheduled board meetings with Gary. Bill Dixon needs to create one or more surrogates for the same reasons. Lee Hart and other "key players" have the same opportunity to stretch their effectiveness.

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- The campaign must request that certain key individuals, committed to the Hart candidacy, plan to devote, on a voluntary basis, 6 to 24 months towards a full time effort on behalf of the campaign. It is necessary to identify those individuals early and advise them as soon as possible so that they can plan ahead with regard to their personal, professional and financial responsibilities and obligations.

II

MONEY

With regard to retiring 1984 financial obligations, a top priority should be given to repay in full all debts incurred in Iowa and New Hampshire, especially to small businesses and individuals. In these two states, trust, reputation, and personal contact are extraordinarily important commodities. Lingering debts in these states carry, a much higher price.

Small business debts in Iowa and New Hampshire, and small business debts in general, are singularly important, as it is the small and medium sized businesspeople that represent the natural business constituency for Gary Hart. The "Hart National Cabinet" program may prove to be fertile ground for cultivating closer ties to the small and medium sized businessperson.

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The Hart National Cabinet and the corresponding "Hartswap" Program can bare the major burden of current and future financial needs. This will require commitment and cooperation on behalf of staff members now and in the future in Washington, Denver and Monarch Beach. With that commitment and cooperation, I believe these programs have virtually unlimited potential. Their success can reduce the financial pressure on and greatly enhance the .pa quality of the other two key fundraising elements; special events and direct mail.

The Cabinet program is important not only because of it's financial promise but also because it embodies other important characteristics that any fundraising effort for the 1988 campaign should demonstrate:

- o An emphasis on quality, not quantity
- o The creation of events and programs which accomplish important secondary goals
- o Effective use of Gary's strengths

Above all, any fundraising effort should be designed to minimize Gary Hart's time, and the time of his key staff. This will allow our most important people to engage in other critical activities.

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III

MESSENGER

The greatest resource this campaign has to offer is the candidate, GARY HART. That resource carried a 1984 presidential campaign to the threshold of a presidential nomination despite a

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serious lack of resources needed to adequately supplement the candidate's individual efforts. For 1988 the campaign must effectively secure all requisite resources. It must also recognize that the candidate will once again be the campaign's greatest asset. It is therefore mandatory that the campaign optimize the use of that resource.

Gary, like anyone, has strengths and weaknesses. The campaign must promote his strengths and must help to mitigate weaknesses. It must understand those strengths and weaknesses and adjust a campaign for Gary rather than trying to adjust Gary for a campaign. If it does so, the campaign will have the best candidate in the field with the greatest chance of success.

In other words "Let Hart be Hart" and let the campaign and those that participate in the campaign make the necessary adjustments so as to optimize that which Gary does well and minimize that which he does not.

The campaign must also allow Gary to be at his best and not over expend him. It needs to regularly schedule a time for Gary to get away from the campaign, from staff, from contributors and from advisors. It must budget time for him to be by himself and to relax.

The campaign must also schedule between now and the start of the 1988 campaign, a significant period of time for Gary to remove

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himself from Senate or campaign responsibilities. This will allow Gary and those closely associated with him to make the needed psychological break from the 1984 and post 1984 campaign mind set and to mentally prepare for the 1988 campaign.

My suggestion is that the six-week period from November 15, 1986 through January 1, 1987 be set aside for Gary to relax, enjoy the holidays, and re-charge himself physically, psychologically, etc. so that he can prepare for the demands of the next 22 months of arduous campaigning that will follow the official announcement of his Presidential candidacy in January of 1987.

While the campaign should not try to mold Gary Hart, it can and should help him mold his image. As an example there exists an image of Gary Hart as a "loner", "aloof", "elusive", "enigmatic", etc. To a lesser but still discernible degree, there is also an image in some quarters that Gary has no real ties to or interest in the concerns of blue color workers or minority groups. Certain steps can be taken to identify and respond to such negatives or voids. A plan should be created and implemented to accomplish this goal.

The loner image should be downplayed. When pressed on it, however, it must be turned to Gary's advantage. It should be stated that Gary Hart, is not a loner. Rather, from the time he first campaigned for the Senate in 1974, and throughout his political career, he has not been willing to merely conform but rather be a leader and a risk-taker. Today, it is fair to say he

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is not so much a loner as he is out in front, leading the revitalization of the Democratic Party.

The Party is in fact changing, and Gary should take credit for this. Gary is a political pioneer, in the spirit of and consistent with the tradition and popular vision of the American West. He is on the cutting edge, the frontier of public policy innovation and administration.

The second issue, is the believed "voids" with regard to blue collar workers, blacks, and other minorities. There are any number of ways to fill those voids, via meetings, speeches, position papers, and the like. Again a program needs to be developed.

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IV

MESSAGE

The substance of Gary's message, of course, is of fundamental importance. The emphasis in this document, however, is on tone, which is also extremely important, especially in the context of politics in the 1980's.

Gary should avoid portraying Ronald Reagan as evil. Most Americans disagree with this portrayal, and for those who voted for Reagan (the majority), this is an unacceptable notion, as it would assert that they themselves are guilty (evil) by association.

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Indeed, in all likelihood it is in our best interests to concede that by some measures in fact the nation is better off (at least for right now) under this administration as compared to previous administrations.

It can be pointed out that Reagan's successes confirmed what Gary has been saying since the early 1970's about the need for government to find new solutions to the problems confronting our post-industrial society. The problem with Reagan's vision is that he would choose to bring us back to the past and not into the future. His programs in fact have difficulty dealing with the present but he has provided Democrats a waystation in their long march to rejuvenate their Party.

In discussing the future, even when discussing tough issues that can be unsettling such as the federal budget deficit, it is imperative that the tone of the message be positive and constructive. Fortunately, when Gary speaks in a positive tone he is most comfortable, effective and inspiring.

The advice here, in short, is to not focus on criticism of Reagan or anyone else's policies, but to focus instead upon the reasonable and positive policies of Gary Hart:

- He is true to Democratic Party principles but not wedded to programs of the past.

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- He believes in sound fiscal management and a deep and abiding concern for the general welfare. The two are not mutually exclusive and, in fact, it is fair to say that, ultimately, there can be no tradeoffs between the twin essentials of a sound economy and preserving a sense of hope and opportunity, even for the most disadvantaged parts of the population.
- He is interested in what works; not in ideology.
- He wants to promote "real" businesses interest - not just "big" businesses interest (the GMs, AT&Ts, and IBMs) and promote the American entrepreneurial spirit.
- He strives for a strong national defense second to no other nation, but refuses to spend for spending's sake.
- He believes we can and we must end the threat of nuclear war, but that will only happen with a President fully committed to making that goal a personal and national priority.
- He wants to continue investments in education, research and development that are key to our being competitive on world markets. Essentially, he is pro-business and pro-defense, while fiscally prudent.

I would also like to address campaign themes or slogans. Aside from being positive and not negative, a theme or slogan can come

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to define the candidate, whereas it should be the other way around. Gary may want to develop a series of themes so that when we perceive voters are tired of the "same old thing", we are prepared with a new emphasis.

All things considered, "True Patriotism" may not prove effective over the long-haul as a primary theme. For one thing, like Reagan-bashing, there is a risk that some will be turned off, thinking it threatens their own sense of patriotism (as opposed to Gary's definition of "True Patriotism"). It may also be perceived as somewhat condescending. "True Patriotism" also suggests some very tough questions - about national service, about registration, about the draft, about a whole Pandora's Box of issues which tend to be emotionally-charged and which could put Gary on the defense unnecessarily.

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CONCLUSION

In closing, I hope the campaign discontinues its negative attitude (sometimes bordering on paranoia) toward Gary Hart being the current "front runner" for the Democratic Party Presidential nomination. I'm reminded of an old saying: "I've been rich and I've been poor, but all things being equal, I'd rather be rich!"

We experienced the "flip-side" of being the front runner in 1982 and 1983. All things being equal, I'd prefer to look down from the top of the ladder, rather than up from the bottom. If for no other reason, the view is better.

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There is no doubt that maintaining a front runner position for almost three years will be difficult. However, I would prefer to bet on Gary Hart defending his leadership position than on any of his potential presidential rivals taking it from him.

I believe that Gary's quest to succeed Ronald Reagan as President in 1988 is the second most difficult task that I have witnessed Gary undertake. Attaining his current status of leadership and creditibility from his 1982 "Dark Horse" position was a more unlikely scenario three years ago than today's scenario of Gary Hart becoming President three years from now. However past accomplishments, no matter how significant, cannot guarantee future success.

The determining factor in whether or not Gary Hart will have the opportunity to govern this country as President, is not whether he has what it takes but rather whether he can recruit the right people, establish an effective campaign organization and dictate a campaign environment that will allow those people to perform their individual and collective responsibilities.

The right people are available. The campaign must supplement the excellent people that now support Gary by identifying and recruiting the additional people that we needed. Gary provides a strong magnet to attract the best talent available.

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The correct structure for an organization can be achieved. The campaign needs a new approach, not just for a Gary Hart organization but perhaps for any political organization to effectively contend in a presidential race in the 1980's. In my experience, organizational ability is not a strength of Gary Hart. It is, however, an easy weakness to mitigate. Gary will have to deal with this issue not only during the campaign but also as President. He must recognize that this is an area where he needs help. Gary must emphasize the importance of a strong organization. He must delegate authority and responsibility to those who have the ability to accomplish his goals. In my mind, in order to achieve his 1988 objective, it is more important for Gary to focus on this issue than any other single problem or opportunity confronting him. A minor adjustment in Gary's approach can make a major difference in his ability to achieve results. He cannot and should not feel he has to accomplish this himself. He must rely on those that are more capable in this area of endeavor. Fortunately, this is something that can be delegated. Gary's personal strengths cannot. It is therefore not prudent for him to focus his time on this but rather that he focus his attention towards having others achieve his organizational goals.

Given the right group of individuals and the right organization, Gary Hart can lead his campaign and our nation into the future.

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It is my goal to help Gary Hart win the Presidency. If elected, our country will have the opportunity to be led by a man with the potential greatness of a George Washington, Abraham Lincoln or Franklin Roosevelt at a time when both we and the world need that leadership the most. I cannot overemphasize how important that goal is to me.

Thank you for your consideration.

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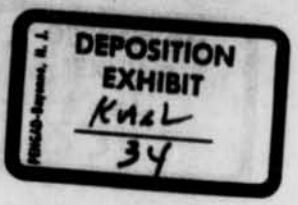

HART RETREAT ITINERARY

M E M O R A N D U M

TO: All Participants & Staff

FM: Stratton & Associates

DA: February 20, 1986

The following is the latest update of the schedule for the Winter Park retreat.

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Thursday, February 20

All day	Flight arrivals at Stapleton Airport (Denver). All attendees met by Stratton & Associates personnel. Transportation provided to Meadow Ridge Condominiums in Winter Park, Colorado.
Evening	Open bar at Host Unit, Meadow Ridge. Check-in at Host Unit and individual condos. Open schedule for dinner as attendees arrive.

Friday, February 21

9:00 - 10:00 am	Light breakfast at Mark Hogan's lodge Phone (303)726-5412
10:15 - 11:45 am	First meeting/work session conducted by Bill Dixon
12:00 nn - 1:30 pm	Break and lunch at Hogan lodge
2:00 - 4:00 pm	Afternoon meeting/work session conducted by Gary Hart
4:00 - 5:00 pm	Break

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Friday, February 21 (cont'd)

5:00 - 6:00 pm	Cocktail hour
6:30 pm	Depart from Hogan lodge and condos for dinner
7:00 pm	Arrive at Club Car Restaurant Phone (303)726-8105
7:15 - 9:00 pm	Dinner
9:15 pm	Group returns to Meadow Ridge
10:00 pm -	Open. Bar available at Host Unit.

Saturday, February 22

8:15 - 9:15 am	Light breakfast at Hogan lodge
9:30 - 11:30 am	Morning meeting/work session conducted by Gary Hart and Bill Dixon
12:00 nn - 1:15 pm	Lunch at Hogan lodge
1:30 - 4:00 pm	Afternoon meeting/work session conducted by Gary Hart and Bill Dixon
5:00 - 6:00 pm	Informal cocktail reception at Hogan lodge. Entertainment by Poncho Harrison.
6:15 - 8:30 pm	Buffet dinner at Hogan lodge

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Saturday, February 22 (cont'd)

9:00 pm -	Open bar at Host Unit

Sunday, February 23

8:30 - 9:30 am	Light breakfast at Hogan lodge
Mid- to late morning and afternoon	Vans and cars depart for Denver airport

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TO: Rama White
FROM: Richard Wagner RW
DATE: June 3, 1986
RE: Co-ordinators Meeting in Colorado

As I mentioned on the phone last week, we're trying to spread the costs of this meeting among those who can help and take a small chunk of the total cost.

I've enclosed a copy of the budget for the meeting. We have a few items covered, but some are still outstanding. If Stuart is willing, I thought he might enjoy covering the bar for everyone for Friday and Saturday night. We here, of course, appreciate anything he sees fit to do.

If Stuart wants to help out, a check should be made payable to 'Stratton & Associates', and mailed to:

Stratton & Associates
1732 East 17th Avenue
Denver, CO 80218

If you or Stuart have any questions, please feel free to give me a call.

Many thanks for your help.

DEPOSITION EXHIBIT
KARL
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RECEIVED
JUL - 6 1986
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Stratton & Associates

STUART KA

MEMO

TO: All Invitees
Hart Volunteer Committee Denver Retreat (July 11 - 13)

FR: Stratton & Associates

RE: Travel Arrangements/Logistics, Etc.

DA: 6/5/86

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As you are aware, we will be coordinating the July retreat in Denver. Plans are being finalized and an interesting and fun get together with Gary, Lee and the rest of the Hart "family" awaits you. Steady activity will continue from Friday the 11th at 4:30 pm to Sunday the 13th at 2 pm. Therefore, your travel plans should be made accordingly. We have arranged for excellent hotel accommodations @ $25.00 per person double occupancy and @ $50.00 single occupancy. This is on a limited number of units and on a first come first serve basis. On a limited basis we will have private housing available for those who cannot afford the hotel rooms. You will be hearing from someone in my office very soon, (Will Dupree, Paula Haikara or Kemetka Jordan.) We will need to know the following as soon as possible:

When will you arrive?
Day -
Time -
Plane/car, etc. (all planes will be met)

What accommodations do you need:
Double -
Roommate preference -
Single -
Private Home -

When will you depart
Day -
Time -
Plane/car, etc. (transportation to airport provided)

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Any special requirements?

SEE YOU SOON!

STUART K

1732 EAST 17TH AVENUE / DENVER, COLORADO 80218 / (303) 329-3626
8615 HARTSDALE AVENUE / BETHESDA, MARYLAND 20817 / (301) 530-0034

TO: All Invitees to July 11-13 Meeting in Denver, Colorado

FROM: Bill Dixon and Bill Shore

DATE: June 25, 1986

RE: Agenda

Attached please find a tentative agenda for our upcoming meeting in Denver.

We plan to discuss Gary's travel schedule for the remainder of 1986, the status of the 1986 elections in your state, and activities of The Volunteer Committee. Additionally, we will discuss various contingencies relating to future elections including 1988.

While there are no secrets in politics, and while we want to encourage as full and frank disscussions as possible, we do hope that written materials you receive at or in advance of the meeting will remain in your hands only, and not be copied or circulated to others, for reasons you understand.

As you review the attached agenda, please keep in mind what we see as the goals of the meeting, and also what the meeting is not: a workshop on campaign skills and techniques. Rather there are at least four principle objectives.

1. To convey to the key state and local supporters of Gary Hart as much much substantive and strategic information about future plans, structures and procedures as is possible.

2. To give the people who will play major leadership roles at the state level a chance to meet, socialize, and exchange ideas.

3. For those of us who work in Washington to have the opportunity to hear your ideas, recommendations, concerns and questions.

4. To have those in attendance return to their states with a clear idea of several specific things which would be helpful to Gary in the next 180 days.

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JUN 30 1986
STUART KARL

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Draft Agenda For Denver, Colorado Meeting
July 11-13, 1986

FRIDAY EVENING: Arrivals by 4:00 PM.

4:30 - 6.15 PM: Reception sponsored by the Colorado Host Committee at Executive Tower Inn. Informal dinner arrangements can be made at the reception since no formal dinner is planned.

Executive Tower Inn (ETI)
1405 Curtis Street
Denver
303-571-0300

6.15 - 6.30: Van departure for Gary's speech on Arm's Control at Regis College (Optional). Vans provided by Stratton & Associates.

SATURDAY:

8:00 - 9:00 AM: Continental Breakfast at Executive Tower Inn

9:00: FIRST SESSION begins

9:00 - 9:15: Welcome by Bill Dixon, overview of what we intend to accomplish during the weekend, description of agenda, opening remarks.

9:15 - 9:45: Bill Dixon and Bill Shore, summary of overall political strategy for 1986 and the future.

9:45 - 10:00: Q&A

10:00 - 10:45: Panel of Mike Moore, Richard Wagner, Jack Quinn, and Bill Dixon to discuss: debt retirement, fundraising strategy, FEC compliance, and related campaign finance matters.

10:45 - 11:15: Q&A

11:15 - 12:00: Panel of Bill Morton, Jack Quinn, Bill Dixon and Bill Shore to discuss Fairness Commission rules, changes in 1988 calendar, delegate selection procedures, DNC and automatic delegates.

12:00 - 12:15: Q&A

12:15 - 1:30: Lunch

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1:30: SECOND SESSION BEGINS

1:30: - 2:15: Panel of Jon Mills, John Emerson, Sue Casey, Chris Brown, John Kulewicz and Rick Ridder to discuss organizing techniques, recruitment of elected officials into state organizations, integration of party establishment, and related matters.

2:15 - 2:30: Q&A

2:30 - 3:00: Panel of Greg Lebel, Doug Wilson, Chris Phillips, and Bill Shore to discuss 1986 elections, candidates GH is helping, The Volunteer Committee, etc.

3:00 - 3:45: Panel discussion on issues, themes, press - Kevin Sweeney and others.

3:45 - 4:00: Q&A

4:00 - 4:15: BREAK. ARRIVAL OF GWH. MIX AND MINGLE

4:15 SECOND SESSION CONTINUES

4:15 - 4:45: GWH speaks on his vision of where the country is headed, major themes, etc.

4:45 - 5:45: Open group discussion with GWH

5:45 - 6:45: DOWNTIME

6:45 - 7:00: Van departure to dinner

7:00: Dinner at The Denver Kent Day School

SUNDAY:

8:00 - 9:00: Continental Breakfast at ETI

9:00: THIRD SESSION BEGINS

9:00 - 9:30: Panel discussion by Chris Phillips and Richard Wagner on communications networks - - both intra and interstate: lists, newsletters, etc.

9:30 - 10:15: Summary and wrap-up by Bill Dixon and Bill Shore. Outline of specific requests of state leaders for the future.

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10:15 - 10:30: Checkout time from ETI.

10:30: Depart for Gary and Lee's home at Troublesome Gulch

11:00 - 1:00: Brunch at Troublesome Gulch with Gary and Lee Hart

1:00: Retreat ends. Open time. Departures.

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GARY HART
WASHINGTON, D.C.

June 24, 1986

Mr. and Mrs. Stuart Karl
Karl Lorimar Home Video
17942 Cowan
Irvine, CA 92714

Dear Stuart and Debbie,

I look forward to seeing you at the July 18th gathering in Wisconsin. Our hosts, Jerry and Marlys Soderberg have been making plans for what will be a terrific weekend at their wonderful family horse farm.

Enclosed is a tentative schedule of activities. Bring active gear, especially if you wish to participate in Saturday afternoon riding, swimming, golf, volleyball, etc.

Reservations have been made for all retreat guests to stay at the Hudson House Inn, a short ride from the farm. The phone number at the Inn is: 715/386-2394.

These weekend retreats take on a very low key atmosphere. It's a time for relaxing and socializing in a friendly and warm setting. We encourage you to bring casual dress. Temperatures for July usually are 80's during the day and mild in the evening.

Nancy Jacobson, of my staff, will be in touch with your offices soon to determine your flight plans so that we can make arrangements to meet you at Minneapolis International Airport. If you should have any additional questions, she can be reached at 202/879-4278.

The retreat promises to be a memorable weekend. Gary, Lee and all of us look forward to being with you.

Sincerely,

Michael P. Novelli

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P.O. Box 75356, Washington, D.C. 20013 • (202) 879-HART

WISCONSIN RETREAT SCHEDULE

FRIDAY EVENING:

6:00 - 8:00	Cocktails/Soderberg Farm
8:00 - 9:00	Barbecue dinner
	Remarks by Gary Hart

SATURDAY:

9:00 - 9:30	Continental Breakfast - Soderberg Farm
9:30 - 11:30	General Session
10:30	Coffee Break
12:00 - 1:00	Lunch
1:00 - 2:15	Second Session
2:15 - 5:30	Recreation (Swimming, Golf, Riding, Volleyball, etc.)

SATURDAY EVENING

6:30 - River Boat Cruise/Cocktails
Dinner/Country Inn

SUNDAY MORNING

8:00 - 9:30	Continental Breakfast - Soderberg Farm
9:30 - 10:00	Wrap up Session

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TO: Staff

FROM: Bill Shore

DATE: June 24, 1986

RE: Major Speeches and Events

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1. July 27 - Address to Citizens Action in Chicago. Approximately 1,000 grass roots activists.

2. August 4 - Address to National Conference of State Legislators in New Orleans.

3. September 8 - Address to the Florida State AFL-CIO in Orlando.

4. September 27 - Keynote Address to Wyoming JJ Dinner in Casper, Wyoming.

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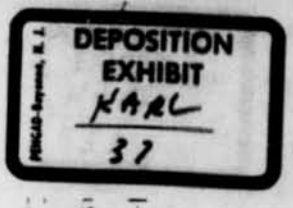

HART NATIONAL CABINET

The Hart National Cabinet represents a nationwide network of insider-activists who all share a common belief in the future of our country as envisioned by Senator Gary Hart. The primary objective of the Cabinet is to strengthen and expand upon the financial and organizational base resulting from the 1984 effort.

The Hart National Cabinet, and our membership, have a specific goal of retiring the 1984 debt before the end of 1986.

This goal will be accomplished by:

* Structuring the Cabinet to encourage participation in the fundraising efforts for Gary Hart, thereby turning passive donors into active collectors. A critical element of the Cabinet concept is the ability to expand its membership <u>beyond</u> the established major contributors to Gary Hart and the Democratic Party.

* Providing an atmosphere for members to become better aquainted with Senator Hart. Members of the Cabinet will be able to share on a personal level their concerns, thoughts and ideas with Senator Hart. In return, they are privy to the Senator's unique analysis of developments in the political and social arenas, both nationally and internationally.

Membership requires an individual to make a financial contribution of $1,000 to Americans With Hart after January 1, 1986. An individual may join by giving $1,000, or by raising that amount, or through a combination of the two. Membership will be renewable each year at no cost.

For those who have the heart, but not the cash flow to join, the Cabinet will facilitate the financing of the $1,000 contribution. Payment may be made over the course of one or two years.

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PO B[illegible] Beach CA 92657 (714) 8[illegible]

As a member you will receive special services and privileges:

* When travelling around the country, Senator Hart will schedule time, when possible, for visits with groups of Cabinet members. These visits will move beyond the typical cocktail reception format into intimate discussions on current Hart activities in both the national and international political arenas.

* A membership scroll, lapel pin, and membership card. The designation Founding Member will be noted on these items if you are amongst the initial members.

* A quarterly Cabinet newsletter that covers the activities of Gary Hart as well as Cabinet activities. Updates on membership enlistment, on the performance of various State Cabinets, and profiles of the leading membership recruiters will be included.

* An '800' number to call to receive weekly reports on the activities of Senator Hart and the Cabinet.

* Notices and invitations to any and all public appearances by Senator Hart in your state as well as notices and comped invitations to selected Hart fundraising events.

* Issue briefs from Senator Hart which will offer an inside view of the political scene. Action in the halls of the Capitol will be covered, along with the grassroots activities that are often the harbingers of the debates defining the political process in Washington.

* An annual directory of Cabinet members nationwide.

Though national in scope, the Cabinet will be organized at the state level. Where needed, intra-state Cabinets may be formed, ie., North/South, or by city. The Cabinet structure is designed to encourage local innitiative and to open lines of communication at the local level.

Several tiers of leadership positions will be available within the Hart National Cabinet. Perhaps the most important positions will be held by State Cabinet Directors. An individual who raises five thousand dollars for Americans With Hart will sit on the Board of Directors in his or her state. State Director's names will be listed on a State Cabinet's stationary and recognized in issues of the Cabinet newsletter.

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Support will be given to those individuals who wish to recruit members into the Hart National Cabinet. Aside from the program itself, which provides incentives for prospective members, video tapes and brochures covering the activities of Gary Hart and the Cabinet will be available.

The Hart National Cabinet is headquartered in Monarch Beach, California. Rick Reiter, Executive Director of the Cabinet, and his staff are determined to see that members receive both service and support in their efforts to enlist new members.

For those who excel in their recruitment efforts, special privileges beyond the standard membership privileges will be available:

<u>Silver Hart Club</u> (sponsorship of 10 new members)

> Invitation to statewide or regional retreat meeting with Gary Hart.

> Special recognition in State Cabinet materials and at State Cabinet events.

<u>Golden Hart Club</u> (sponsorship of 25 new members)

> Invitation to a national weekend retreat with Gary Hart in an informal resort setting.

> Invitation to special national events for Hart.

> Invitation to travel with Hart and entourage on special trips in their state or region.

9304353 8841

NATIONAL BANK OF WASHINGTON

(NBW)

LOAN APPLICATION AND INSTALLMENT NOTE

Full Name (Last, First, Middle): _____

Birthdate: _____

Present Street Address: _____

City: _____ State: _____ Zip Code: _____

Years there: _____ Telephone: _____

Social Security No: _____ Drivers License No. _____

Present Employer: _____ Years There: _____

Employer's Telephone: _____

Employer's Address: _____

Present Salary or Commission: $_____ per _____

Have you previously received credit from National Bank of Washington ? _____

Personal Checking Account No.: _____

Institution and Branch: _____

Savings Account No.: _____

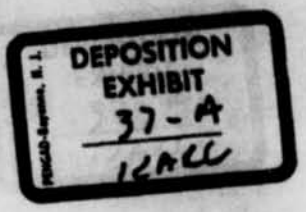
Institution and Branch: _____

	Credit Cards	Acct. No.	Name in which card is held
1.	_____	_____	_____
2.	_____	_____	_____

(PLEASE COMPLETE AND SIGN THE REVERSE SIDE)

005715

9304353 8842



HART NATIONAL CABINET
MEMBERSHIP APPLICATION

Name PIERRE E. LOUBET

Mailing Address 438½ BEGONIA
Home(X) Office()
CORONA DEL MAR, CA Zip 92625

Home Phone (714) 675-8639 Work Phone (714) 474-0355

SPONSOR _____ STATE _____

Age 26 Congressional District _____

Occupation VP NEW MARKETS Employer KARL-LORIMAR HOME VIDEO

Birthdate NOV. 14, 1959

POLICY CONCERNS:

National Security (✓) Economic & Social Justice ()

Human Investment & Economic Modernization/Competitiveness ()

Energy and Environment (✓)

FINANCE COMMITMENT:

Check (✓)

Financing ()

Signature _____ Date _____

HART NATIONAL CABINET
P.O. BOX 6908
MONARCH BEACH, CA 92677
(714) 581-1986

005574

930435 1843

APR 29 1985

FLIGHT LOG

No. 2718

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714)852-8300

Date: 4-24-85 ACFT: ~~N2834~~ 4474CR

PIC: DD SIC:

Sched By: BP/CF Date: 4-25-85

AUTHORIZED BY: PAMA CUSTOMER: KARL'S VIDEO

ADDRESS: ON FILE

QUOTE: PHONE: (W)

AE BA MC CASH CHECK (CREDIT) PAID (H)

ITINERARY: SNA TO SMO ① 1300 SMO TO SNA ② 1330 TO TO

TO TO TO

PAX: ~~Sak~~; ~~DEBRA~~; Cooper? Senator Hart

LEG NO.	1	2	3	4	5	6
TOW						
MGTOW						
C.G. LOCATION						
C.G. LIMITS						

2.0	FLT. HOURS @	595.00	1190.00
	WAIT HOURS @		
	MAX. WAITS @		
	RON'S @		
	MISC @		
	SUBTOTAL		1190.00
	FED. TAX 5% 8%		
	FLIGHT TOTAL		1190.00

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED
1	3	04/26	LAX SNA	534.4	536.4	—	—	2.00	+	
2									+	
3									+	
4									+	
5									+	
6									+	
						TRIP TOTALS		2.00	✓ +	

ROUTE	ALT	ETE	FOB
Pd to O = 1000.00			
G.P = 190.00			

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.						
TRIP TIME	2.0					
TOTAL TIME						

AIRCRAFT CHECKED AND FOUND AIRWORTHY; PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature)

NOTES:

DEPOSITION EXHIBIT KARL 35

D.O.F. 11 D.O.Q. 2 3 TENTATIVE OR CONFIRMED: 8 4 5 CONTACT

CUSTOMER ADDRESS: On File

PHONE 2. AIRCRAFT QUOTED: RATE:

L-1

D/P LEG: 1. FROM: SNA TO: SMO ETD: 1430 ETA: 1450 RON: Y. N. STBY HRS: NO.

LEG. 2. FROM: SMO TO: SNA ETD: 1455 ETA: 1515 RON: Y. N. STBY HRS: NO.

LEG. 3. FROM: TO: ETD: ETA: RON: Y. N. STBY HRS: NO.

LEG. 4. FROM: SNA TO: SMO ETD: 1800 ETA: 1820 RON: Y. N. STBY HRS: NO.

2 WAY

LEG. 5. FROM: SMO TO: SNA ETD: 1830 ETA: 1850 RON: Y. N. STBY HRS: NO.

LEG. 6. FROM: TO: ETD: ETA: RON: Y. N. STBY HRS: NO.

LEG. 7. FROM: TO: ETD: ETA: RON: Y. N. STBY HRS: NO.

LEG. 8. FROM: TO: ETD: ETA: RON: Y. N. STBY HRS: NO.

SPECIAL INSTRUCTIONS: 1-Way Drop @ SMO @ 1430

P/U @ SMO @ 1830 - 1-Way

PASSENGER NAMES: 1. T K 2. Maybe? Cooper 3.

5. Debra 6. 7.

BROKERED FLIGHT INFORMATION:

F.B.O. CONTACT NAME: PI

NOTES:

FROM OF PAYMENT: AE: BA: MC: VISA: CHECK: CASH: CREDIT: OR: P. O.

SALESMAN: DP - PMB DATE: TIME:

INVOICE N

107733

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

PROP ORDER# 5000

SOLD TO

RAMA WHITE

899 WEST 16TH STREET
NEWPORT BEACH, CA 92660

SHIP TO

RAMA WHITE

899 WEST 16TH STREET
NEWPORT BEACH, CA 92660

PAGE

ACCOUNT NO	SLMAN NO	PURCHASE ORDER NO	DEPT	COLL	PPD	DATE SHIPD	TERMS	INVOICE DATE	PA
CL1240						6 /25/85	NET 15	9 /10/85 GN	

QUANTITY		ITEM NO	DESCRIPTION	UNIT PRICE	DISC %	EXTENDED PRICE
2	2		FLIGHT HOURS	595.00	0	1190.00
0	0		HELICOPTER FLIGHT	0.00	0	0.00
0	0		444CR; LONG RANGER	0.00	0	0.00
0	0		ONA/L4X/ONO	0.00	0	0.00
0	0		REF: SEN. HART	0.00	0	0.00

4
3
8
4
6

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

SALE AMOUNT	1190.00
MISC. CHARGES	
SALES TAX	
FREIGHT	

9304353 8847

April 1985

S	M	T	W	T	F	S
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30				

26

~~Call~~ - Fri @ 7:00 re: house

S Weekend retreat

W/ Gary Hart

- transportation provided
- room @ Ritz-Carlton
- Rancho Carillo

4/27 | bedroom suite @ Ritz-Carlton.

PW Arrowhead Arms - Bob (619) 325-9723

- Court Day 2.

PM 6:30 S.M. -

Arranged hdc for Laguna

Richard Wagner per: Doug

(Out of Sync) (5) Gary + Lee Hart Bill Shore Doug Eisen

May 1985

S	M	T	W	T	F	S
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	

March 1985

S	M	T	W	T	F	S
					1	2
4	5	6	7	8	9	
11	12	13	14	15	16	
18	19	20	21	22	23	
25	26	27	28	29	30	

610008

Catering cost ? MAY 31 1985 (KS)

Date: 5/31 ACFT: 78JR 0435 3 8482

PIC: HOFMANDH ✓ SIC: CWEXELBERG ✓

Sched By: Date:

FLIGHT LOG

MA 3697

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 546-4300

93.5NA

AUTHORIZED BY: RANIA CUSTOMER: STUART / KARL'S VIDEO

ADDRESS: ON FILE

QUOTE: PHONE: (W) 714-474-0355

AE BA MC CASH CHECK CREDIT PAID (H)

ITINERARY: SNA TO SFO (4) 160 SFO TO SND (6) 140x/200 SND TO SNA (0)

TO ○ TO ○ TO ○

PAX: STUART KARL

LEG NO.	1	2	3	4	5	6
TOW	91	91	91			
MGTOW						
C.G. LOCATION						
C.G. LIMITS						

2.3	FLT. HOURS @ 1350.00	= 3105.00
4.0	WAIT HOURS @ 40.00	= 160.00
	MAX. WAITS @	=
	RON'S @	=
Catering		200.00
deli	MISC @	= 14.29
	SUBTOTAL	=
	FED. TAX 5% 8%	=
	FLIGHT TOTAL	= 3479.29

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
			SNA											
1	4	5-31	SFO	1700	1805	1630	1810	1+05	1+20	3026	IFR			
2	6	5-31	LAX	2030	2125	2027	2135	+55	1+13	2662	↓			
3	4	5/31	SNA	2200	2218	2155	2220	:18	+25	820				
4									+					
5									+					
6									+					
						TRIP TOTALS		2.3 ✓	2+58	6508				

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD	4166.5	2149.4	2860	2152.4	2861	3041
TRIP TIME	2.3	2.3	3	2.3	3	3
TOTAL TIME	4168.8	2151.7	2863	2154.7	2864	3044

2:18 ✓

AIRCRAFT CHECKED AND FOUND AIRWORTHY; PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature)

NOTES:

DEPOSITION EXHIBIT Karl 39

CHARTER QUOTE SHEET

DOF. 5-31-85 DOQ. 5-30-85

CONTACT: RAMA

CUSTOMER: STUART KARL

CUSTOMER ADDRESS: ON FILE

PHONE NUMBER: 714-474-0355

AIRCRAFT QUOTED: ~~[redacted] 70A~~ 120 785R

RATE QUOTED: CONTRACT

FORM OF PAYMENT:

AE: BA: MC: VISA: CHECK:

CASH: P.O.#

CREDIT CARD NUMBER:

TATOL NUMBER OF PAX: 6 PAX

LEG#	FROM:	TO:	D/T	RON:	STBY:	ETA:
1.	SNA	SFO	1500	0	3/4.0 Hrs	
2.	SFO	SMO	19/2000	0	0	
3.	SMO	SNA		0	0	
4.						
5.						
6.						
7.						
8.						
9.						
10.						

PASSENGERS PER LEG:

1. 4 2. 6 3. 4 4. ____ 5. ____ 6. ____

7. ____ 8. ____ 9. ____ 10. ____

PASSENGER NAMES:

1. STUART KARL
2.
3.
4.
5.
6.
7.

CATERING REQUIRED ON LEG NUMBERS:

(1) (2) 3. 4. 5. 6. 7. 8. 9. 10.

TYPE OF CATERING REQUIRED:

LOTS OF:
COORS LITE COORS REG.
HOT DOGS TRAY DELUXE

9 3 0 4 3 6 3 1 8 4 9

PURCHASE ORDER

PURCHASE ORDER NUMBER
56435
THIS NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES, PACKAGE & CORRESPONDENCE

MartinAviation, Inc.

19331 Airport Way South
Santa Ana, California 92707
714/546-4300

TO BON VIVANT (CATERING) SHIP TO 78JR

ADDRESS 714/673-3191 ADDRESS

CITY 714/675-9580 STATE

DATE	DEPARTMENT	REQUISITION NO	SHIP VIA	TERMS	RESALE PERMIT NO
5/30	CHARTER	511012			SREA24097067

	QUANTITY ORDERED	QUANTITY RECEIVED	INVOICE NO	DESCRIPTION	PRICE	NET
1				STUART KARL		30435350
2						
3				CHEESE + CRACKER TRAY	280 00	
4				HOR D'OEUVRES - TRAY		
5				6 PAX		
6						
7						
8						
9						
10						
11			D	Steuart Karl		
12				N78JR MA#3697		
13						
14						
15						
16				NIL 1705 5/30		
17						
18						
19						

Charged direct.

PLEASE SEND TWO (2) COPIES OF YOUR INVOICE WITH ORIGINAL BILL OF LADING.

Authorized Signature X GW

ADM-11

INVOICE

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

FROM ORDER [illegible] 3471

SOLD TO	SHIP TO
KARL'S HOME VIDEO 17942 COWAN IRVINE, CA 92714	KARL'S HOME VIDEO 17942 COWAN IRVINE, CA [illegible]

ACCOUNT NO	SLMAN NO	PURCHASE ORDER NO	DEPT	COLL	PPD	DATE SHIPD	TERMS	INVOICE DATE	PAGE
[illegible]						[illegible]	NET 15	[illegible]	

QUANTITY		ITEM NO	DESCRIPTION	UNIT PRICE	DISC %	EXTENDED PRICE
2.3	2.3		FLIGHT HOURS	1350.00	0	3105.00
4	4		WAIT HRS@	40.00	0	160.00
1	1		CATERING	200.00	0	200.00
1	1		MISC. EXPENSES	14.29	0	14.29
0	0		N78JR; FALCON 50	0.00	0	0.00
0	0		DMA/DFW/LAX/SNA	0.00	0	0.00

SALE AMOUNT	3479.29
MISC. CHARGES SALES TAX FREIGHT	
TOTAL	3479.29

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

BILLING OFFICE

9304353 8852

6/9/86

Dear Richard,

Hope this is ok.
Let me know if I can
do anything else.

Warm Regards,

Lana

00026

G. STUART KARL. JR.

June 6, 1986

TO: Americans With Hart

INVOICE: 001

RE: 6/22/85 Air Transportation

COST: $360.

ITINERARY: San Francisco-Fresno-San Francisco

(2)

00027

FLIGHT LOG

MA 4090

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 546-4300

94 12

Date 6/22 ACFT 78JR

PIC HOFFMAN DH SIC SIMCRAY

Sched By MS/GW Date 6/20

AUTHORIZED BY: RAMA CUSTOMER STUART KARL

ADDRESS: Lonmar Prod

QUOTE: PHONE: (W)

AE BA MC CASH CHECK CREDIT PAID (H)

ITINERARY: SNA TO SFO (O) 1430 SFO TO FAT (S) 1600 FAT TO SFO (S)

SFO TO SNA (O) TO ( ) TO ( )

PAX:

LEG NO.	1	2	3	4	5	6
TOW	91	91	91	91		
MGTOW						
C.G. LOCATION						
C.G. LIMITS						

3.0	FLT. HOURS @ 1700.	= 5100.00
4.2	WAIT HOURS @ 50	= 210.00
	MAX. WAITS @	=
	RON'S @	=
	~~Catal~~ UP @ 3+5 MISC @	= 15.00
	SUBTOTAL	= 5325.00
11+0 225.00	FED. TAX 5% 8%	= 426.00
	FLIGHT TOTAL	= 5751.00

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
1	0	6/20	SNA	1435	1530	1430	1535	.55	1+05	2531	IFR			
2	6	6/22	FAT	1705	1738	1655	1740	.33	0+45	1699				
3	6	6-22	SFO	2021	2048	2015	2055	:27	+40	1505				
4	4	6-22	SNA	2129	2215	2120	2240	1:06	1+20	2715				
5									+					
6									+					
						TRIP TOTALS		3.0	3+50	8450				

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.	4181.3	2164.2	2871	2167.2	2875	3055
TRIP TIME	3.0	3.0	4	3.0	4	4
TOTAL TIME	4184.3	2167.2	2878	2170.2	2879	3059

AIRCRAFT CHECKED AND FOUND AIRWORTHY; PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature)

NOTES: 4.2 paid stdby hours

CHARTER QUOTE SHEET

D.O.F. 6-22-85 D.O.Q. 6-20-85

CONTACT: RAMA

CUSTOMER: STUART KARL

CUSTOMER ADDRESS: ON-FILE

PHONE NUMBER: 714-474-0355

AIRCRAFT QUOTED: F20C

RATE QUOTED: OWNER

TOTAL PRICE QUOTED: 5,891.40

FORM OF PAYMENT:

AE: BA: MC: VISA: CHECK: CASH:

NAME ON CREDIT CARD: CREDIT

CC# 9304353856

LEG#	FROM:	TO:	D/T	RON:	STBY:	ETA:
1.	SNA	SFO	1430	0	0	1550
2.	SFO	FAT	1600	0	3.0	1645
3.	FAT	SFO	1930	0	0	2010
4.	SFO	SNA	2030	0	0	2140
5.						
6.						
7.						
8.						
9.						
10.						

PASSENGERS PER LEG:

1. 0 2. S/H 3. S/H 4. 0 5. 6. 7.

8. 9. 10.

CATERING REQUIRED ON LEGS NUMBERS:

1. (2.) (3.) 4. 5. 6. 7. 8. 9. 10

PASSENGER NAMES:

1. SENATOR GARY HART VIP
2.
3.
4.
5.
6.

TYPE OF CATERING REQUIRED:

HAVE DELUXE CATERING ONBOARD

(4)

PURCHASE ORDER

PURCHASE ORDER NUMBER
69739

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

TO PAR AVION
ADDRESS
CITY STATE

SHIP TO 7BJR
ADDRESS

DATE	DEPARTMENT	REQUISITION NO.	SHIP VIA	TERMS	RESALE PERMIT NO
6/21	CHARGE	5110-12			SREA24097067

	QUANTITY ORDERED	QUANTITY RECEIVED	INVOICE NO.	DESCRIPTION	PRICE	NET
1				STUDENT LUNCH MR11 4090		
2						
3				DELUX SEAFOOD + SANDWICH		
4				TRAY		
5					225 00	
6					1	
7						
8						
9						
10						
11				ORDERED 6/21		
12						
13						
14						
15						
16						
17						
18						
19						

PLEASE SEND TWO (2) COPIES OF YOUR INVOICE WITH ORIGINAL BILL OF LADING.

Authorized Signature X

ADM-1

VENDOR (5)

STATEMENT

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/546-4300

10A3--

FROM ORDER# 5767

KARL - LORIMAR HOME VIDEO
17942 COWAN
IRVINE, CA 92714

KARL - LORIMAR HOME VIDEO
17942 COWAN
IRVINE, CA 92714

PAGE 1

CK1205 06/22/85 NET 15 06/29/85

3	3	FLIGHT HOURS	1700.00	0	5100.00
4.2	4.2	WAIT HOURS	50.00	0	210.00
3	3	LANDING FEES	5.00	0	15.00
1	1	FEDERAL TAX	426.00	0	426.00
0	0	N78JR; FALCON 20	0.00	0	0.00
0	0	FLT. DATE: 6/22/85	0.00	0	0.00
0	0	SNA/SFO/FAT/SFO/	0.00	0	0.00
0	0	SNA	0.00	0	0.00

9304353

5751.00

575

G. STUART KARL. JR.

June 6, 1986

TO: Americans With Hart

INVOICE: 002

RE: 10/18/85 Air Transportation

COST: $150.

ITINERARY: San Francisco-LosAngeles

(7)

00028

Date 10-18-85 ACFT: 1CU FALCON 20

PIC HOEHN DH SIC PA Ansden

Sched By Mike Severy Date 10-17-85

FLIGHT LOG

MA No 5838

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 546-4300

AUTHORIZED BY: RAMA CUSTOMER: STUART KARL

ADDRESS: ON-FILE

QUOTE: PHONE: (W) 714-474-0355

AE BA MC CASH CHECK CREDIT PAID (H)

ITINERARY: SNA TO SFO (4) 1930 SFO TO LAX (5) 2100 LAX TO SNA (2)

TO TO TO

PAX: LEG 1 M/MRS STUART KARL LEG 2 SENATOR GARY HART BILL SHORE
mr&mrs Stuart KARL RICHARD WAGNER

LEG NO.	1	2	3	4	5	6
TOW		22600				
MGTOW	91	27337	91			
C.G. LOCATION		23.4				
C.G. LIMITS		20.0-28.5				

(2.2)	FLT. HOURS @ 1,700.00	3910.00
1.9	WAIT HOURS @ 45.00	85.50
	MAX. WAITS @	
	RON'S @	
1	CATERING @	157.00
1 C/F	MISC @ 14.29	14.29
FUEL 633.08 CATERING 157.00	SUBTOTAL	4,166.79
	FED. TAX 5% 8%	320.78
	FLIGHT TOTAL	4,487.57

LEG NO.	PAX	DATE	DEPT SNA	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
1	2	10-17	SFO	2004	2106	1755	2110	1.1 1.02	1+15	2330	IFR			
2	3	"	LAX	2120	2220	2015	2225	:51	1+10	2658	↓			
3	4	"	SNA	2240	2258	2235	2300	:18	+25	760				
4									+					
5									+					
6									+					
						TRIP TOTALS		2:11	2+50	6298				

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.	5549.9	857.4	12	857.4	12	6541
TRIP TIME	2.2	2.2	3	2.2	3	3
TOTAL TIME	5552.1	859.6	15	859.6	15	6544

AIRCRAFT CHECKED AND FOUND AIRWORTHY; PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature)

NOTES: MAKE CATERING ONBOARD

- 1.3 SNA

MartinAviation
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

(b)

K1204
KARL'S HOME VIDEO

17942 COWAN
IRVINE, CA.
92714

Invoice No. 00650
Invoice Date 10/25/85
Flight Log Number 5838
Pilot In Command ..... 01-DICK HOFFMAN
Second in Command..... 01-PHIL AMSDEN

Itinerary : SNA SFO LAX SNA

Flight Dates: 10/18/85 to 10/18/85
Aircraft : 1U

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	2.3	1,700.00	3,910.00	
Wait Hours	1.9	45.00	85.50	
Max Wait				
Rons				
		Total Flight Charge ..		3,995.50
CATERING	1	157.00	157.00	
LANDING FEE	1	14.29	14.29	
		Total Misc. Charges ..		171.29
		Sub-Total		4,166.79
		Transportation Tax ...		320.78
		Flight Total		4,487.57

Comments
PAXS: M/M STUART KARL,
SENATOR GARY HART, RICHARD
WAGNER, BILL SHORE

OCT 3 1 1985

1850T

FLIGHT LOG

MA Nº 6415

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 546-4300

03

Date: 10/31 ACFT: 853WS

PIC: KG SIC

Sched. By: M/S Date:

AUTHORIZED BY: DOUG ROSEN CUSTOMER: DOUG ROSEN (STUART KARL) BILL TO 5

ADDRESS:

QUOTE: PHONE: (W) 213-392-8305

AE BA MC CASH CHECK CREDIT PAID (H)

ITINERARY: SNA TO SAN (O) 0615 SAN TO LAX (1) 0715 LAX TO SNA (O)

TO ( ) TO ( ) TO ( )

PAX: MS. ROSEN

LEG NO.	1	2	3	4	5	6
TOW	/	11962	/			
MGTOW/MATOW	41	12500	41			
C.G. LOCATION		186.3				
C.G. LIMITS	/	183.2-146.4	/			

1.4 (1.1)	FLT. HOURS @ 695.00	= 923.00
1.0	WAIT HOURS @ 25.00	= 25.00
	MAX. WAITS @	=
	RON'S @	=
	MISC @	=
	SUBTOTAL	= 998.00
	FED. TAX 5% (8%)	= 79.84
	FLIGHT TOTAL	= 1077.84

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
			SNA											
1	ϕ	10/31	SAN	1099.2	1099.6	0615	0655	.4	0+40		IFR			
2	1	10/31	LAX	1099.6	1100.1	0725	0805	.5	0+40					
3	ϕ	10/31	SNA	1100.1	1100.3	0815	0840	.2	0+25					
4									+					
5									+					
6									+					
							TRIP TOTALS	1.1	1+45					

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.	1099.2					
TRIP TIME	1.1					
TOTAL TIME	1100.3					8 6 2

AIRCRAFT CHECKED AND FOUND AIRWORTHY; PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED

Ken Gibson (Signature)

NOTES:

9 8 0 4 3 8 2

DEPOSITION EXHIBIT KARL 41

MartinAviation
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: K1794
KARL'S HOME VIDEO
17942 FITCH
IRVINE, CA. 92714

INVOICE NO. 00828
INVOICE DATE 10/31/85

FLIGHT DATES: 10/31/85 to 10/31/85
ITINERARY : SNA SDM LAX SNA

INVOICE NO. 00828

AIRCRAFT : 18607
PILOT IN COMMAND.... KIM GIBSON

FLIGHT LOG NUMBER.. 641

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	1.4	695.00	973.00	
Ht Hours	1.0	25.00	25.00	
Wait				
Hours				
		Total Flight Charge ..		998.00
		Total Misc. Charges ..		
		Sub-Total		998.00
		Transportation Tax ..		79.84
		Flight Total		1,077.84

*** TERMS: NET 15 ***

NOV 10 1985

FLIGHT LOG

MA Nº 6517

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 546-4300

Date: 11-3-85 ACFT: 717RM
PIC: KLV SIC:
Sched. By: M/S Date: 10-17-85

AUTHORIZED BY: DOUG ROSEN CUSTOMER: DOUG ROSEN
Bill S. Karl
ADDRESS:
QUOTE: PHONE: (W)

AE BA MC CASH CHECK CREDIT PAID (H)

ITINERARY: SNA to LAX ⓪ 0900 LAX to SAN ① 1030 SAN to SNA ② 1100
to ○ to ○ to ○

PAX: MRS. ROSEN + GARY O'DELL + FRIENDS

LEG NO.	1	2	3	4	5	6
TOW		10515				
MGTOW	91	12500	91			
C.G. LOCATION		186.4				
C.G. LIMITS		181.0-196.4				

1.2	FLT. HOURS @ 695	- 834.00
(.8)	WAIT HOURS @	-
	MAX. WAITS @	-
	RON'S @	-
2	LIF MISC @	- 10.00
	SUBTOTAL	- 844.00
	FED. TAX 5% 8%	- 67.52
	FLIGHT TOTAL	- 911.52

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
			SNA											
1	0	11/3	LAX	3736.7	3737.0	2100	2130	.3	+30					
2	3	11/3	SAN	3737.0	3737.5	2215	2300	.5	+45					
3	0	11/3	SNA	3737.5	3737.9	2320	2400	.4	+40					
4									+					
5									+					
6									+					
						TRIP TOTALS		1.2	1+55					

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.	3738.0	3738.0	5697	3539.0	5246	5697
T... T...	1.2	1.2	3	1.2	3	3
TOTAL						

AIRCRAFT CHECKED AND FOUND AIRWORTHY; PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

Kum A. Kim

NOTES: * JANICE - CHECK GENERIC DYNAMICS AIRFRAME VS HOBBS & SEE IF YOU CAME UP W/ THE SAME THING I DID. MA 11 #64
KLV

MartinAviation
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: K1204
KARL'S HOME VIDEO
17942 COWAN
IRVINE, CA. 92714

INVOICE NO. 00900
INVOICE DATE 11/10/85

FLIGHT DATES: 11/03/85 to 11/03/85
ITINERARY : SNA LAX SAN SNA

AIRCRAFT : 717RM
PILOT IN COMMAND.... KEVIN WAYT

INVOICE NO. 00900

FLIGHT LOG NUMBER.. 6517

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	1.2	695.00	834.00	
Wait Hours				
[illegible] Wait				
Runs				
		Total Flight Charge ..		834.00
LANDING FEES	2	5.00	10.00	
		Total Misc. Charges ..		10.00
		Sub-Total		844.00
		Transportation Tax ...		67.52
		Flight Total		911.52

Comments
PAX: MRS. DOUG ROSEN

*** TERMS: NET 15 ***

THANK YOU FOR FLYING WITH MARTIN AVIATION, INC. TELEPHONE: (714) 852-8300

31 Y

JET COPTERS - BROKERED 1-818-902-08

866

DEC 9 1985

(16)

FLIGHT LOG

MA № 6758

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 546-4300

05

Date 12-5-85 ACFT 576

PIC: _____ SIC: _____

Sched By: Mike Sweely Date: 12-5-85

KL04 ✓

AUTHORIZED BY: RAMA CUSTOMER: STUART KARL

ADDRESS: ON-FILE

QUOTE: _____ PHONE: (W) 1-818-902-0800

AE BA MC CASH CHECK CREDIT PAID (H) _____

ITINERARY: VNY TO LAX ⓞ 1630 LAX TO SNA ⓢ 1730 SNA TO VNY ⓞ

TO ○ TO ○ TO ○

PAX: SENATOR HART + 4

LEG NO.	1	2	3	4	5	6
TOW						
MGTOW						
C.G. LOCATION						
C.G. LIMITS						

1.1	FLT. HOURS @ 1800.00	= 1980.00
	WAIT HOURS @	=
	MAX. WAITS @	=
	RON'S @	=
	MISC @	=
	SUBTOTAL	= 1980.00
	FED. TAX 5% 8%	=
	FLIGHT TOTAL	= 1980.00

JET COPTERS P.O. 67387 1980.00

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
1									+					
2			LAX-Mission Hospital						+					
3									+					
4									+					
5									+					
6									+					
			TRIP TOTALS						+					

DEPOSITION EXHIBIT KARL 42

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.						
TRIP TIME						
TOTAL TIME						

AIRCRAFT CHECKED AND FOUND AIRWORTHY, PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature)

NOTES: DROP/OFF AT MISSION COMM HOSPITAL

SENATOR HART

HANK YOU FOR FLYING WITH MARTIN AVIATION, INC. TELEPHONE: (714) 85.

MartinAviation
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: K1204
STUART KARL
ATTN: RAMA WHITE
17942 COWAN
IRVINE, CA. 92714

INVOICE NO. 01415
INVOICE DATE 12/31/85

FLIGHT DATES: 12/05/85 to 12/05/85
ITINERARY : VNY LAX SNA

INVOICE NO. 01415

AIRCRAFT : S76

FLIGHT LOG NUMBER.. 6758

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	1.1	1,800.00	1,980.00	
Wait Hours				
Max Wait				
Rons				
		Total Flight Charge ..		1,980.00
		Total Misc. Charges ..		
		Sub-Total		1,980.00
		Transportation Tax ...		
		Flight Total		1,980.00

comments
PAX: SENATOR HART + 4
DROP OFF AT MISSION COMM.
HOSPTIAL

*** TERMS: NET 15 ***

9304353 8867

DEC 15 1985

(17)

Date: 12-5-85 ACFT 7444CR 4313 8388

PIC: _____ SIC _____

Sched By Mike Sewell Date: 12-5-85

FLIGHT LOG

KIZOH MA / Nº 6759

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 546-4300

04

AUTHORIZED BY: RAMA CUSTOMER: STUART KARL ✓

ADDRESS: ON-FILE

QUOTE: _____ PHONE: (W) 1-714-474-0355

AE BA MC CASH CHECK CREDIT PAID (H) _____ C

ITINERARY: SNA to LAX ⓞ 1630 LAX to MISSION COMM HOSP. ⓒ 1730 MISSION COMM HOSP. to SNA ⓞ

to ○ to ○ to ○

PAX: _____

LEG NO	1	2	3	4	5	6
TOW						
MGTOW						
C.G. LOCATION						
C.G. LIMITS						

2.0	FLT. HOURS @ 595	= 1190.00
3.5	WAIT HOURS @ 50	= 175.00
	MAX. WAITS @	=
	RON'S @	=
	MISC @	=
	SUBTOTAL	=
	FED. TAX 5% 8%	=
	FLIGHT TOTAL	= 1365.00

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
			SNA											
1	4	12/5/85	LAX MISSION	1756.4	1758.4	1630	1730	2.0	5+5					
2									+					
3									+					
4									+					
5									+					
6									+					
						TRIP TOTALS		2.0	3+5					

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.	1760.4					
TRIP TIME	2.0					
TOTAL TIME	1762.4					

AIRCRAFT CHECKED AND FOUND AIRWORTHY. PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature)

NOTES: DROP/OFF BAGGAGE AT MISSION COMM HOSPITAL

MartinAviation
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: K1204
STUART KARL
ATTN: RAMA WHITE
17942 COWAN
IRVINE, CA. 92714

INVOICE NO. 01228
INVOICE DATE 12/15/85

FLIGHT DATES: 12/05/85 to 12/05/85
ITINERARY : SNA LAX

AIRCRAFT : 444CR

INVOICE NO. 01228

FLIGHT LOG NUMBER.. 6759

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	2.0	595.00	1,190.00	
Wait Hours	3.5	50.00	175.00	
Max Wait				
Rons				
		Total Flight Charge ..		1,365.00
		Total Misc. Charges ..		
		Sub-Total		1,365.00
		Transportation Tax ...		
		Flight Total		1,365.00

Comments

4 Pax
from LAX to Mission Comm. Hosp.

*** TERMS: NET 15 ***

9304355 4869

82 Y) Jet Copters 818-702-0890 DEC 3 1 1985 (16)

FLIGHT LOG

KIXOY MA / Nº 6766

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 546-4300

05

Date: 12-8-85 ACFT: 576

PIC: SIC:

Sched By: Mike Sweeny Date: 12-8-85

AUTHORIZED BY: RAMA CUSTOMER: STUART KARL ✓

ADDRESS: ON-FILE

QUOTE: PHONE: (W) 714-474-0355

AE BA MC CASH CHECK CREDIT PAID

ITINERARY: VNY TO Mission Viejo (D) Mission Viejo Hosp TO SNA (S) SNA TO VNY (D)

TO ○ TO ○ TO ○

PAX:

LEG NO.	1	2	3	4	5	6
TOW						
MGTOW						
C G LOCATION						
C G LIMITS						

1.6	FLT. HOURS @ 1200.—	= 1880.00
	WAIT HOURS @	=
	MAX. WAITS @	=
	RON'S @	=
	MISC @	=
	SUBTOTAL	= 1880.00
	FED. TAX 5% 8%	= —
	FLIGHT TOTAL	= 1880.00

JETCOPTERS P.O. 6783 2625.00

LEG NO	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
1									+					
2									+					
3									+					
4									+					
5									+					
6									+					
						TRIP TOTALS			+					

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.						
TRIP TIME						
TOTAL TIME						

AIRCRAFT CHECKED AND FOUND AIRWORTHY; PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature)

NOTES: Stuart Hart

MartinAviation
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: K1204
STUART KARL
ATTN: RAMA WHITE
17942 COWAN
IRVINE, CA. 92714

INVOICE NO. 01416
INVOICE DATE 12/31/85

FLIGHT DATES: 12/08/85 to 12/08/85
ITINERARY : ONT LAX

AIRCRAFT : S76

INVOICE NO. 01416

FLIGHT LOG NUMBER.. 6766

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	1.6	1,800.00	2,880.00	
Wait Hours				
Max Wait				
Rons				
		Total Flight Charge ..		2,880.00
		Total Misc. Charges ..		
		Sub-Total		2,880.00
		Transportation Tax ...		
		Flight Total		2,880.00

Comments
PAX: SENATOR HART

*** TERMS: NET 15 ***

930435 4871

$88
was
add #86

Date: 2-6-86 ACFT: 411 444CR

PIC: SIC:

Sched. By: MIKE SEVERY Date: 2-16-86

FLIGHT LOG

MA N° 7793

Martin Aviation Che
19331 Airport Way South
Santa Ana, California 927(
(714) 852-8300

AUTHORIZED BY: RAMA CUSTOMER: STUART KARL

ADDRESS: ON-FILE

QUOTE: PHONE:(W) 714-474-0355

AE BA MC CASH CHECK CREDIT PAID (H)

ITINERARY: SNA TO SMO (2) 1700 SMO TO SNA (2) 1745 TO TO TO TO

PAX: MR DOUG ROSEN + MR STEVE RIVERS

LEG NO.	1	2	3	4	5	6
TOW						
MGTOW						
C G. LOCATION						
C G. LIMITS						

1.0	FLT. HOURS @ 595.00	= 595.0
	WAIT HOURS @	=
	MAX. WAITS @	=
	RON'S @	=
	MISC @	=
	SUBTOTAL	= 595.0
FUEL 53.72	FED. TAX 5% 8%	=
	FLIGHT TOTAL	= 595.00

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED
1	2	2/6	SNO	18243	18253	—	—	1.0	+	
2									+	
3									+	
4									+	
5									+	
6									+	
					TRIP TOTALS			1.0 ✓	+	

ROUTE	ALT	ETE	F(

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.	18243					
TRIP TIME	1.0					
TOTAL TIME	18253				4812	

AIRCRAFT CHECKED AND FOUND AIRWORTHY, PRE-FLIGHT, ROUTE AND FLI-GHT PLANNING COMPLETED.

PIC (Signature)

9304354

NOTES:

DEPOSITION EXHIBIT 1 of 1 43

MartinAviation
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: K1204
STUART KARL
ATTN: RAMA WHITE
17942 COWAN
IRVINE, CA. 92714

INVOICE NO. 01844
INVOICE DATE 2/15/86

FLIGHT DATES: 2/06/86 to 2/06/86
ITINERARY : SNA SMO SNA
AIRCRAFT : 444CR

INVOICE NO. 01844
FLIGHT LOG NUMBER.. 7793

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	1.0	595.00	595.00	
Wait Hours				
Max Wait				
Rons				
		Total Flight Charge ..		595.00
		Total Misc. Charges ..		
		Sub-Total		595.00
		Transportation Tax ...		
		Flight Total		595.00

Comments
AUTH. BY: RAMA
PAX: MR. DOUG ROSEN AND
MR. STEVE RIVERS

*** TERMS: NET 15 ***

MAR 15 1986 17B

9304354874

FLIGHT LOG

MA Nº 8170

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 852-8300

03

Date 3-14-86 ACFT 4-1

PIC: SIC:

Sched By MIKE SEVERY Date: 3-7-86

AUTHORIZED BY: RAMA CUSTOMER: STUART KARL

ADDRESS: ON-FILE

QUOTE: PHONE: (W) 714-474-0355

AE BA MC CASH CHECK **CREDIT** PAID (H)

ITINERARY: SNA TO SMO ⓒ 1500 SMO TO SNA Ⓢ 1600 TO

TO TO TO

PAX: ✱ SENATOR GARY HART + 4

LEG NO.	1	2	3	4	5	6
TOW						
MGTOW						
C.G. LOCATION						
C.G. LIMITS						

1.0	FLT. HOURS @ 595	=	595.00
1.0	WAIT HOURS @ 50	=	50.00
	MAX. WAITS @	=	
	RON'S @	=	
	MISC @	=	
	SUBTOTAL	=	
	FED. TAX 5% 8%	=	
	FLIGHT TOTAL	=	645.00

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED
1	3	3/14	SNA	1854.5	1855.5	1500	1700	1.0	+	
2									+	
3									+	
4									+	
5									+	
6									+	
						TRIP TOTALS		1.0	+	

ROUTE	ALT	ETE	FOB

DEPOSITION EXHIBIT KARL 44

NOTES: P/U AT (SMO)

SENATOR GARY HART

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.	1855					
TRIP TIME	1.0					
TOTAL TIME	1855					

AIRCRAFT CHECKED AND FOUND AIRWORTHY; PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature)

MartinAviation
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: K1204
STUART KARL
ATTN: RAMA WHITE
17942 COWAN
IRVINE, CA. 92714

INVOICE NO. .....
INVOICE DATE .....

FLIGHT DATES: 3/14/86 to 3/14/86
ITINERARY : SNA SMO SNA

INVOICE NO. .....

AIRCRAFT : 444CP

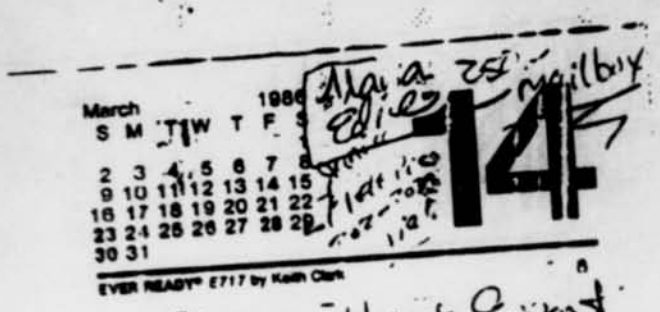
FLIGHT LOG NUMBER. 3176

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	1.0	595.00	595.00	
Wait Hours	1.0	50.00	50.00	
Max Wait				
Pons				
		Total Flight Charge ..		645.00
		Total Misc. Charges ..		
		Sub-Total		
		Transportation Tax ...		
		Flight Total		645.00

Comments
WITH. BY: RAMA
PICK UP SENATOR GARY HART

*** TERMS: NET 15 ***

THANK YOU FOR FLYING WITH MARTIN AVIATION, INC. TELEPHONE: (714) 852-8300



PCH Pacific Coast Hwy

CDM = Corona Del Mar

-- Cathy - Heart Event at Bijou Port Theatre - 905 E. PCH. C.D.M. - $1. to Ed - ~~co~~ chairman

- The Boy who Could Fly - Hart Event 3/15 $30 per person in L.A. - (213) 550-1909 * contact - Dory @ Albert Gersten & Assoc. yes 2/27 black tie

$30 per ticket blk tie to Brennick

:15 Hart L.A. event tomorrow.

9304351 18876

February 1986
S M T W T F S
1
2 3 4 5 6 7 8
9 10 11 12 13 14 15
16 17 18 19 20 21 22
23 24 25 26 27 28

April 1986
S M T W T F S
1 2 3 4 5
6 7 8 9 10 11 12
13 14 15 16 17 18 19
20 21 22 23 24 25 26
27 28 29 30

073 Friday, March 14 292

6:0059

TUESDAY 1-86 — 6/25 — CMMS — 0435 4877 — BROKERED TO ... 1-800-221-0197 20

Date: 6-24-86 ACFT: LR 35 321AC

PIC: SIC:

Sched By MIKE SEVERY Date: 6-20-86

FLIGHT LOG

MA Nº 10483

6/24/25

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 546-4300

05

AUTHORIZED BY: RAMA CUSTOMER: STUART KARL

ADDRESS: ON-FILE

QUOTE: PHONE: (W) 714-474-0355

(H)

AE BA MC CASH CHECK CREDIT PAID

ITINERARY: TEB to DCA 1230 DCA to TEB 1630 to to to to to

PAX: MR STUART KARL

LEG NO.	1	2	3	4	5	6
TOW						
MGTOW						
C.G. LOCATION						
C.G. LIMITS						

2.0	FLT. HOURS @	1485.00	= 2970.00
	WAIT HOURS @		=
	MAX. WAITS @		=
	RON'S @		=
1 CATERING		56.92	56.92 E
1 H/F - PARK	MISC @	117.30	= 117.30
	SUBTOTAL		= 3144.22
8087	FED. TAX 5% 8%		= 246.98
	FLIGHT TOTAL		= 3391.20

LEG NO.	PAX	DATE	DEPT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK TAKEOFF	BLOCK LANDING	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED
1									+	
2									+	
3									+	
4									+	
5									+	
6									+	
						TRIP TOTALS			+	

ROUTE

DEPOSITION EXHIBIT KARL 45

2x1235 56.92 (gt.)

land+pk 117.30

ALT	ETE	FOB

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD.						
TRIP TIME						
TOTAL TIME						

AIRCRAFT CHECKED AND FOUND AIRWORTHY; PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature)

NOTES: MEETING WITH SENATOR GARY HART — PUT ON Bill —

N

Net-Net 2570

2644.22

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: [illegible]
KORT - LORIMAR HOME VIDEO
17942 COWAN
IRVINE, CA. [illegible]

INVOICE NO. 03852
INVOICE DATE 7/01/86

FLIGHT DATES: 6/24/86 to 6/24/86
ITINERARY : TEB DCA TEB

INVOICE NO. 03852

AIRCRAFT : 321AC

FLIGHT LOG NUMBER.. 10483

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	2.0	1,485.00	2,970.00	
Wait Hours				
Max Wait				
Rons				
		Total Flight Charge ..		2,970.00
CATERING	1	56.92	56.92	
LANDING & PARKING	1	117.30	117.30	
		Total Misc. Charges ..		174.22
		Sub-Total		3,144.22
		Transportation Tax ...		246.98
		Flight Total		3,391.20

Comments
MEETING WITH SENATOR HART
AUTHORIZED BY: RAGA

*** TERMS: NET 15 ***

THANK YOU FOR FLYING WITH MARTIN AVIATION, INC. TELEPHONE: (714) 852-8300

9304354878

Fri_Sat Lear 230

FLIGHT LOG

Martin Aviation Charter
19331 Airp[illegible]y South
Santa Ana, California 92707
(714) 852-8300

Date: 11/21-22 ACFT: 37984
PIC: KWAIT SIC: GODELL
Sched By: BF Date: 11/20

K120 MA Nº 3723

10.5 3.2 IRON

AUTHORIZED BY: MS CUSTOMER: S. KARL
ADDRESS: PHONE:(W)
QUOTE: (H)

AE BA MC CASH CHECK CREDIT PAID 11/22

ITINERARY: 11/21 SLA TO OCA (1) 1300 | OCA TO DEN (4) 0500 | DEN TO SMA (4) -
TO TO TO

PAX: MIKE SEVERY

	1	2	3	4	5	6
LEG NO						
TOW	16885	16555	15360			
MATOW	18300	18300	16967			
C.G. LOCATION	385.2	380.8	378.6			
C.G. LIMITS	375.8-387.0	378.8-387.0	373.9-387.0			

(10.4)	FLT. HOURS @ 1195.00	=	12547.50
3.2	WAIT HOURS @ 50.00	=	160.00
	MAX. WAITS @	=	
1	RON'S @ 495.00	=	495.00
1 CATERING	419.84	=	419.84
3'/F	MISC @ 10.00	=	30.00
BOOR=59.36 RON=160.00 LAT=37.54 65.94 FUEL=184[illegible]	SUBTOTAL	=	136[illegible]
	FED. TAX 5% 8%	=	1058.60
	FLIGHT TOTAL	=	14710.94

LEG NO	PAX	DATE	AIRPORT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK OUT	BLOCK IN	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED
			SNA							
1	1	11/21	DCA	1508.4	1512.8	1300	1750	4.4	4+50	5050
2	4	11/22	ENL	1512.8	1516.5	0535	0930	3.7	3+55	4400
3	1	11/22	FAD	1516.5	1517.4	1054	1157	.9	1+03	1300
4	1	11/22	SNA	1517.4	1518.8	1300	1435	1.4	1+35	1600
5									+	
6									+	
					TRIP TOTALS			10.4	11+23	

7200
1600
5400

ROUTE

DEPOSITION EXHIBIT KARL 46

	ALT	ETE	FOB

	AIRFRAME	ENG NO. 1	CYCLES	ENG NO. 2	CYCLES	LDGS
FLT TIME						
TIME FWD.	2732.1	2732.1	2265	2732.1	2254	2278
TRIP TIME	10.4	10.4	4	10.4	4	4
TOTAL TIME	2742.5	2742.5	2269	2742.5	2258	2282

AIRCRAFT CHECKED AND FOUND AIRWORTHY PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED

PIC (Signature)

NOTES: KL 0015
DP - Corona - (Sandwich)
DCA-SLA - Sandwich Trip
Night
Fuel Flow
(stay) DCA DEN

MW DECKER EXECUTIVE AIR FLEET 1700 Brad

Date: 11/1 ACFT: 711JT

PIC: SIC:

Sched. By: Date:

FLIGHT LOG

K1204 MA № 3780

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 852-8300

05

AUTHORIZED BY: M. Seng CUSTOMER: S. Karl STUART KARL

ADDRESS:

QUOTE: PHONE: (W) 800-

AE BA MC CASH CHECK CREDIT PAID (H)

TEB-DCA-TEB

ITINERARY: TEB TO DCA (L) 1700 drop TO TO TO TO TO TO

PAX: M. Emrys.n

LEG NO.	1	2	3	4	5	6
TOW						
MATOW						
C.G. LOCATION						
C.G. LIMITS						

2.0	FLT. HOURS @ 1,535.00	=	3070.00
	WAIT HOURS @	=	
	MAX. WAITS @	=	
	RON'S @	=	
1 4/F	MISC @ ~~100.00~~ ~~60.00~~	=	~~100.00~~ ~~60.00~~
	SUBTOTAL	=	3170.00
	FED. TAX 5% 8%	=	253.60
P.O. 74926 2570.00	FLIGHT TOTAL	=	3423.60

LEG NO.	PAX	DATE	AIRPORT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK OUT	BLOCK IN	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED
1									+	
2									+	
3									+	
4									+	
5									+	
6									+	
						TRIP TOTALS			+	

ROUTE	ALT	ETE	FOB

DEPOSITION EXHIBIT KARL 47

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD						
TRIP TIME						
TOTAL TIME						

AIRCRAFT CHECKED AND FOUND AIRWORTHY; PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature)

NOTES: Cash $ Martin 2570 net-net
add 500
3070
@ 45.60 tax
$ 3315.60

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: K1204
STUART KARL
ATTN: MIKE SEVERY
17242 COMAN
IRVINE, CA. 92714

INVOICE NO. 06207
INVOICE DATE 12/00/86

FLIGHT DATES: 0/00/00 to 0/00/00
ITINERARY : TEB OCA TEB

INVOICE NO. 06207

AIRCRAFT : 7111T

FLIGHT LOG NUMBER.. 3780

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	2.0	1,535.00	3,070.00	
Wait Hours				
Tax Wait				
Mons				
		Total Flight Charge ..		3,070.00
LANDING FEE	1	100.00	100.00	
		Total Misc. Charges ..		100.00

Comments
AUTHORIZED BY: MIKE SEVERY
PAX: MR. EMERSON

Sub-Total	3,170.00
Transportation Tax ...	253.60
Flight Total	3,423.60

*** TERMS: NET 15 ***

9304353 8882

December 1986

S	M	T	W	T	F	S
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30	31			

8

EVER READY® E717 by Keith Clark

- Hartz Mtg. 2:30-4:30 Hedgsley
- G. Hartz Farewell & Dinner - Invites & more info to follow per. Mike Nouvelli (201) 879-4278

SK Prop Taxes due 12/10

November 1986

S	M	T	W	T	F	S
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30						

January 1987

S	M	T	W	T	F	S
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	31

610089

THEJ Lear 30435348883

DEPOSITION EXHIBIT KALL 48

281

Date: 2/24/87 ACFT: 3794K

PIC: P.Amsden PIC SIC: K.Gibson PIC

Sched By: BF Date: 2/20

FLIGHT LOG

KIROS MA Nº 2296F

Martin Aviation Charter
19331 Airport Way South
Santa Ana, California 92707
(714) 852-8300

AUTHORIZED BY: MS CUSTOMER: S. Kaul

ADDRESS:

QUOTE: PHONE:(W)

AE BA MC CASH CHECK CREDIT PAID (H)

ITINERARY: SNA TO SMO @ 1130 SMO TO DEN @ 1300 DEN TO SNA @ 17ZN/NIL

TO TO TO

PAX: S Kaul + ~~Tom Eppstein~~ + GRIFF AMES

LEG NO	1	2	3	4	5	6
TOW	15400	15400	14400			
MATOW	15697	17947	17566			
C.G. LOCATION	374.6	374.6	374.3			
C.G. LIMITS	374.1 - 397.0	374.3 - 399.0	373.3 - 397.0			

4.3	FLT. HOURS @ 1195	5138.50
3.8	WAIT HOURS @ 50	190.00
	MAX. WAITS @	
	RON'S @	60.00
2	MISC @ 10	20.00
	SUBTOTAL	
14210	FED. TAX 5% 8%	427.88
	FLIGHT TOTAL	5836.38

LEG NO.	PAX	DATE	AIRPORT	HOBBS TAKEOFF	HOBBS LANDING	BLOCK OUT	BLOCK IN	TOTAL TIME HOBBS	TOTAL TIME BLOCK	FUEL USED	ROUTE	ALT	ETE	FOB
1	1	2.24	SNA	1766	1767	1157	1285	.4	0+28	410	FFA			
2	2	2.24	DEN	1761	1768	1310	1515	1.3	2+05	2400	PAY 4.3 FLT			
3	"	"	SNA	1768	1771	1708	1935	2.3	2+27	2750	" 3.8 STBY			
4									+		PAY KG PIC RATE - NO SIC AVAIL.			
5									+		Ver: BF			
6									+					
					TRIP TOTALS			4.3	5+40	5560				

FLT TIME	AIRFRAME	ENG. NO. 1	CYCLES	ENG. NO. 2	CYCLES	LDGS
TIME FWD	2490.7	2490.9	2533	2490.7	2419	2551
TRIP TIME	4.2	4.3	3	4.3	3	3
TOTAL TIME	2995.0	2995.2	2536	2995.0	2422	2554

AIRCRAFT CHECKED AND FOUND AIRWORTHY; PRE-FLIGHT, ROUTE AND FLIGHT PLANNING COMPLETED.

PIC (Signature)

NOTES: KL-0051

(Ana - @ BP 3.8 DO NOT DRINK) SNA Sandwich DEN Fo. 4

DEN-SNA - Chart ~~Grant~~ Sand

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: K129G
KARL - LORIMAR HOME VIDEO
ATTN: MIKE SEVERY
17942 COWAN
IRVINE, CA 92714

INVOICE NO. 07263
INVOICE DATE 2/28/87

FLIGHT DATES: 2-4-87 to 0/00/00
ITINERARY : SNA SMO DEN SNA

INVOICE NO. 07263

AIRCRAFT : 37984
PILOT IN COMMAND.... PHIL AMSDEN
SECOND IN COMMAND... KEN GIBSON

FLIGHT LOG NUMBER.. 2296

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	4.3	1,195.00	5,138.50	
Wait Hours	3.8	50.00	190.00	
Max Wait				
Mons				
		Total Flight Charge ..		5,328.50
CATERING	1	60.00	60.00	
LANDING FEE	2	10.00	20.00	
		Total Misc. Charges ..		80.00
		Sub-Total		5,408.50
		Transportation Tax ...		427.88
		Flight Total		5,836.38

Comments:
KL-0054
PAX: S. KARL & GRIFF AMES

*** TERMS: NET 15 ***

MartinAviation, Inc.
19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO: K1205
KARL- LORIMAR HOME VIDEO
ATTN: MIKE SEVERY
17942 COWAN
IRVINE, CA. 92714

INVOICE NO. 07328
INVOICE DATE 2/28/87

FLIGHT DATES: 0/00/00 to 0/00/00
ITINERARY :

INVOICE NO. 07328

AIRCRAFT : 37984

FLIGHT LOG NUMBER.. 2296F

Description Of Charge	Units	Rate	Extension	Totals
Flight Hours	4.3	1,195.00	5,138.50	
Wait Hours	3.8	50.00	190.00	
Max Wait				
Rons				
		Total Flight Charge ..		5,328.50
CATERING	1	60.00	60.00	
LANDING FEE	2	10.00	20.00	
		Total Misc. Charges ..		80.00

Comments

Sub-Total	5,408.50
Transportation Tax ...	427.88
Flight Total	5,836.38

*** TERMS: NET 15 ***

PURCHASE ORDER

PURCHASE ORDER NUMBER
78206

MartinAviation, Inc.

19331 Airport Way South
Santa Ana, California 92707
714/852-8300

TO Transport Concpt. SHIP TO Vicki

ADDRESS _____ ADDRESS _____

CITY _____ STATE _____

DATE	DEPARTMENT	REQUISITION NO.	SHIP VIA	TERMS	RESALE PERMIT NO
2/24	Charter	511007			SREA24097067

	QUANTITY ORDERED	QUANTITY RECEIVED	INVOICE NO.	DESCRIPTION	PRICE	NET
1				N37954		
2				S. Karl		
3				Sandwich for 4 pax	60 00	
4				deliver by 1130		
5				MAIL 2396		
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
16						
17						
18						
19						

PLEASE SEND TWO (2) COPIES OF YOUR INVOICE WITH ORIGINAL BILL OF LADING.

Authorized Signature X

VENDOR

2304353 8887

*** LEAR 35 ***

WINTER: 1200 lb min P/L $1195.00 /Hr

Leg Num	From Apt	To Apt	Tru Crs	Dist nmi	Fuel Stops	ETE Hrs:Min	Allow load Pounds	Fuel Burn
1	SNA	SMO	305	35	0	0+16	3225	397
2	SMO	DEN	58	736	0	1+57	3225	2547
3	DEN	SNA	244	722	0	2+ 4	3225	2666
Subtotals				1,493 nmi		4.3 Hour(s)		5,611

Flight time charges	$5,133.50
3.0 Standby hour(s)	$150.00
0 Overnight(s)	$0.00
Extra items	$30.00
8% Tax	$425.48
Totals 1,493 nmi 4.3 Hour(s)	$5,743.70

SMO SANTA MONICA CA

DEN STAPLETON INT'L. DENVER CO

SNA ORANGE COUNTY JOHN WAYNE. SANTA ANA CA
MARTIN AVIATION... NEXT TO TERMINAL

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2583

DATE FILMED 11-30-93 CAMERA NO. 2

CAMERAMAN JMH

9304355348888

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

✓ Microfilm

_____ Public Rcds

_____ Press

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 2583.

1/10/94

9403096627 54

OGC 0130

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

94 JAN -7 PM 1:59

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

JAN 7 11 01 AM '94

Janurary 4, 1994

FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

Attn: Jose M. Rodriguez

Following is a statement that I Want placed in the public record of your file concerning your alligations that you believed I violated 2 U. S. C. # 441f, which file you are now closing. Here is the statement to be placed in said public record:

I was always innocent, as I have stated in all of my past depositions, of any Federal alligations against me. I was unfairly accused and unjustly hounded over the past 6 years, to the great detriment of my physical and mental well being. I resent being subjected to this injustice, and the grief it has caused me as well as the expenditure of time and money I have been forced to spend to recover my physical and mental well being. As a citizen I deplore the flagrant expenditure of taxpayers money. At last I can put this behind me and get on with my life!

I understand that, as a citizen, I can request a copy of my entire file.

I hereby request that you send me complete copies, including F.B.I. files, and of all files that mention or concern me in any way, to the following address:

Robynne D. Phillipsen

6165 Palau Street

Cypress, Calif. 90630

GEORGE PERCEFULL
COMM. # 972225
Notary Public — California
ORANGE COUNTY
My Comm. Expires AUG 26, 1996

STATE of California
County of ORANGE

SUBSCRIBED AND SWORN TO BEFORE ME
THIS 6th DAY OF JAN 1994
George Percefull
NOTARY PUBLIC

Robynne D. Phillipsen
January 6th 1994

Robynne D. Phillipsen

940309627 55

FEDERAL ELECTION COMMISSION
94 JAN -7 PM 1:59

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Robynne Phillipsen
6165 Palau Street
Cypress, California 90603

RE: MUR 2583
Robynne Phillipsen

Dear Ms. Phillipsen:

On June 20, 1988, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441f. On June 28, 1988, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jose M. Rodriguez
Attorney

Date the Commission voted to close the file: DEC 09 1993

9403096275 6

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

✓ Microfilm

_____ Public Recds

_____ Press

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 2583.

12/10/93

93043541844

THE READER IS REFERRED TO ADDITIONAL MICROFILM LOCATIONS

FOR THE FOLLOWING DOCUMENTS PERTINENT TO THIS CASE

1. Memo, General Counsel to the Commission, dated September 22, 1992, Subject: Priority System Report. See Reel 354, pages 1590-94.

2. Memo, General Counsel to the Commission, dated April 14, 1993, Subject: Enforcement Priority System. See Reel 354, pages 1595-1620.

3. Certification of Commission vote, dated April 28, 1993. See Reel 354, pages 1621-22.

4. General Counsel's Report, In the Matter of Enforcement Priority, dated December 3, 1993. See Reel 354, pages 1623-1740.

5. Certification of Commission vote, dated December 9, 1993. See Reel 354, pages 1741-1746.

9304354184 5

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

DEC 10 1993

Jerry Nicholson, Esq.
Law Offices of Jerry Nicholson
5375 East Second Street, Suite 1
Long Beach, California 90803

RE: MUR 2583
Robert W. Bonham

Dear Mr. Nicholson:

On June 20, 1988, your client Robert W. Bonham was notified that the Federal Election Commission had found reason to believe that he violated 2 U.S.C. § 441f. On July 22, 1988, Mr. Bonham submitted a response to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against your client, Robert W. Bonham. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jose M. Rodriguez
Attorney

Date the Commission voted to close the file: DEC 09 1993

9304354184846

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Jeffrey M. Ettinger, Esq.
P.O. Box 800
Austin, Minnesota 55912

RE: MUR 2583
Gary Hunt
Linda J. Cacia

Dear Mr. Ettinger:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

J. R.

Jose M. Rodriguez
Attorney

9304354184847

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Dennis Blackburn
19141 Woodford Terrace
Irvine, California 92715

RE: MUR 2583
Dennis Blackburn

Dear Mr. Blackburn:

On July 20, 1988, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441f. On July 21, 1988, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jose M. Rodriguez
Attorney

Date the Commission voted to close the file: DEC 09 1993

9304354184 8

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

DEC 10 1993

Patricia Bonham
219 Grant Street
Newport Beach, California 92663

RE: MUR 2583
Patricia Bonham

Dear Ms. Bonham:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jose M. Rodriguez
Attorney

9304354184 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Abraham Kantzabedian
219 Grant Street
Newport Beach, California 92663

RE: MUR 2583
Abraham Kantzabedian

Dear Mr. Kantzabedian:

On March 1, 1988, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441f.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jose M. Rodriguez
Attorney

Date the Commission voted to close the file: DEC 09 1993

9304354185 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Robynne Phillipsen
6165 Palau Street
Cypress, California 90603

RE: MUR 2583
Robynne Phillipsen

Dear Ms. Phillipsen:

On June 20, 1988, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441f. On June 28, 1988, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

José M. Rodriguez
Attorney

Date the Commission voted to close the file: DEC 09 1993

9304354185 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1992

Court Shannon
Impact Home Entertainment
249 Forest Avenue
Laguna Beach, California 92651

RE: MUR 2583
Court Shannon

Dear Mr. Shannon:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jose M. Rodriguez
Attorney

9304354185 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 16 1993

Alison Weir
177 Riverside Avenue
Newport Beach, California 92663-4018

RE: MUR 2583
Alison Weir

Dear Ms. Weir:

On June 20, 1988, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441f. On July 19, 1988, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jose M. Rodriguez
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Steven J. Bornstein
28 Avenue 28th
Venice, California 90291

RE: MUR 2583
Steven J. Bornstein

Dear Mr. Bornstein:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jose M. Rodriguez
Attorney

9304354185 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Edward D. Hanlon
224 Esplanada
Irvine, California 92715

RE: MUR 2583
Edward D. Hanlon

Dear Mr. Hanlon:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jose M. Rodriguez
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

DEC 10 1993

Edward Herrera
5027 E. Tango Circle
Anahein, California 92807

RE: MUR 2583
Edward Herrera

Dear Mr. Herrera:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Jose M. Rodriguez
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

David M. Satz, Jr. Esq.
Saiber, Schlesinger, Satz & Goldstein
One Gateway Center
Newark, New Jersey 07102-5311

RE: MUR 2583
Janis Klinger
Richard Klinger

Dear Mr. Satz:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jose M. Rodriguez
Attorney

9304354185 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

E.J. Oshins
11302 Moorpark Street
North Hollywood, California 91602

RE: MUR 2583
E.J. Oshins

Dear Ms. Oshins:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jose M. Rodriguez
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

DEC 10 1993

Donald R. Wager, Esq.
10920 Wilshire Boulevard
Suite 1000
Los Angeles, California 90024

RE: MUR 2583
Harold Weitzberg

Dear Mr. Wager:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jose M. Rodriguez
Attorney

9304354185 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Betty Ann Weir
177 Riverside Avenue
Newport Beach, California 92663-4018

RE: MUR 2583
Betty Ann Weir

Dear Ms. Weir:

On June 20, 1988, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441f. On November 21, 1988, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jose M. Rodriguez

Date the Commission voted to close the file: DEC 09 1993

9304354186O

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

George Reginald Unwin
177 F. Riverside
Newport Beach, California 92663-4018

RE: MUR 2583
George Reginald Unwin

Dear Mr. Unwin:

On June 16, 1989, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441f.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jose M. Rodriguez
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1992

Bernard E. Schneider, Esq.
Buchalter, Nemer, Fields & Younger
660 Newport Center Drive
Suite 1400
Newport Beach, CA 92660

RE: MUR 2583
Friends of Gary Hart-88, Inc.,
and Stephen D. Alfers,
as treasurer

Dear Mr. Schneider:

On March 4, 1988, your clients were notified that the Federal Election Commission had found reason to believe they violated 2 U.S.C. §§ 434, 441a(f), 441b(a), and 441f. Beginning on June 10, 1988, your clients submitted numerous responses to the Commission's reason to believe findings.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against your clients, Friends of Gary Hart-88, Inc., and Stephen D. Alfers, as treasurer, as concerns the above captioned matter. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

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If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jose M. Rodriguez
Attorney

Date the Commission voted to close the file: DEC 0 9 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Bernard E. Schneider, Esq.
Buchalter, Nemer, Fields & Younger
660 Newport Center Drive
Suite 1400
Newport Beach, CA 92660

RE: MUR 2583
Americans With Hart, Inc.
and Bernard E. Schneider,
as treasurer

Dear Mr. Schneider:

On March 4, 1988, your client and its then treasurer were notified that the Federal Election Commission had found reason to believe they violated 2 U.S.C. §§ 434, 441a(f), 441b(a), and 441f. Beginning on May 6, 1988, your client submitted numerous responses to the Commission's reason to believe findings.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against your client, Americans With Hart, Inc., and you, as treasurer. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

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If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jose M. Rodriguez
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

Pierre E. Loubet
2334 Naples
Newport Beach, California 92660

RE: MUR 2583
Pierre E. Loubet

Dear Mr. Loubet:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jose M. Rodriguez
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Bernard E. Schneider, Esq.
Buchalter, Nemer, Fields & Younger
660 Newport Center Drive
Suite 1400
Newport Beach, CA 92660

RE: MUR 2583
Gary W. Hart

Dear Mr. Schneider:

On March 4, 1988, your client was notified that the Federal Election Commission had found reason to believe he violated 2 U.S.C. §§ 441a(f) and 441b(a). Beginning on June 6, 1988, your client submitted numerous responses to the Commission's reason to believe findings. Additionally, on July 15, 1988, your client provided testimony in this matter.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against your client, Gary W. Hart. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jose M. Rodriguez
Attorney

Date the Commission voted to close the file: DEC 09 1993

9304354186 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1990

Paul E. Sullivan, Esq.
Wunder, Ryan, Cannon & Thelan
1615 L. Street, N.W.
Suite 650
Washington, DC 20036

RE: MUR 2583
David Stein

Dear Mr. Sullivan:

On March 4, 1988, your client was notified that the Federal Election Commission had found reason to believe he violated 2 U.S.C. §§ 441a(a)(1)(A) and 441a(a)(3). On April 13, 1988, your client submitted a response to the Commission's reason to believe findings. Additionally, on February 1, 1989, your client produced numerous documents relevant to this matter.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against your client, David Stein. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

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If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jose M. Rodriguez
Attorney

Date the Commission voted to close the file: DEC 0 9 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

John D. Vandevelde, Esq.
Talcott, Lightfoot, Vandevelde,
Woehrle & Sadowsky
Thirteenth Floor
655 South Hope Street
Los Angeles, CA 90017

RE: MUR 2583
Lorimar Home Video, Inc.

Dear Mr. Vandevelde:

On March 4, 1988, your client was notified that the Federal Election Commission had found reason to believe it violated 2 U.S.C. §§ 441b(a) and 441f. Beginning on April 12, 1988, your client submitted numerous responses to the Commission's reason to believe findings.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against your client, Lorimar Home Video, Inc. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

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If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jose M. Rodriguez
Attorney

Date the Commission voted to close the file: DEC 0 9 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

John D. Vandevelde, Esq.
Talcott, Lightfoot, Vandevelde,
Woehrle & Sadowsky
Thirteenth Floor
655 South Hope Street
Los Angeles, CA 90017

RE: MUR 2583
Lorimar Telepictures, Corp.

Dear Mr. Vandevelde:

On March 4, 1988, your client was notified that the Federal Election Commission had found reason to believe it violated 2 U.S.C. § 441b(a). Beginning on April 12, 1988, your client submitted numerous responses to the Commission's reason to believe findings.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against your client, Lorimar Telepictures Corporation. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

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If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jose M. Rodriguez
Attorney

Date the Commission voted to close the file: DEC 09 1993

9304354187 3

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

DEC 10 1992

Alvin S. Michaelson, Esq.
Michaelson & Levine
1901 Avenue of the Stars
Suite 1708
Los Angeles, CA 90067

RE: MUR 2583
Rama Middel

Dear Mr. Michaelson:

On March 4, 1988, your client was notified that the Federal Election Commission had found reason to believe she violated 2 U.S.C. § 441f. On April 11, 1988, your client provided testimony in response to the Commission's reason to believe finding. Subsequently, on January 24, 1992, your client submitted a brief in response to the General Counsel's probable cause brief in this matter.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against your client, Rama Middel. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

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If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jose M. Rodriguez
Attorney

Date the Commission voted to close the file: DEC 09 1993

9304354187 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Lee D. Foreman, Esq.
Haddon, Morgan & Foreman
1034 Logan Street
Denver, CO 80203

RE: MUR 2583
Douglas Rosen

Dear Mr. Foreman:

On April 20, 1988, your client was notified that the Federal Election Commission had found reason to believe he violated 2 U.S.C. §§ 441a(f), 441b(a), and 441f. On July 18, 1988, your client submitted a response to the Commission's reason to believe findings.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against your client, Douglas Rosen. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jose M. Rodriguez
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

DEC 10 1993

Lee D. Foreman, Esq.
Haddon, Morgan & Foreman
1034 Logan Street
Denver, CO 80203

RE: MUR 2583
Keith Glaser

Dear Mr. Foreman:

On March 4, 1988, your client was notified that the Federal Election Commission had found reason to believe he violated 2 U.S.C. §§ 441a(f) and 441b(a). On April 13, 1988, your client submitted a response to the Commission's reason to believe findings. Subsequently, on October 4, 1988, your client provided testimony in this matter.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against your client, Keith Glaser. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jose M. Rodriguez
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1992

Laurie S. Fulton, Esq.
Williams & Connolly
839 Seventeenth Street, N.W.
Washington, DC 20006

RE: MUR 2583
George Stuart Karl, Jr.

Dear Ms. Fulton:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

José M. Rodriguez
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

John D. Vandevelde, Esq.
Talcott, Lightfoot, Vandevelde, Woehrle & Sadowsky
655 South Hope Street, 13th Floor
Los Angeles, California 90017

RE: MUR 2583
Janice Benlein
Catherine W. Bramnick
Linda Kinwald
John J. Lutgens
Karen Stewart

Dear Mr. Vandevelde:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jose M. Rodriguez
Attorney

9304354187879

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

John D. Vandevelde, Esq.
Talcott, Lightfoot, Vandevelde, Woehrle & Sadowsky
655 South Hope Street, Thirteenth Floor
Los Angeles, California 90017

RE: MUR 2583
Jeff Jenest

Dear Mr. Vandevelde:

On June 20, 1988, your client Jeff Jenest was notified that the Federal Election Commission had found reason to believe he violated 2 U.S.C. § 441f. On July 19, 1988, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against your client. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jose M. Rodriguez
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

✓ Microfilm

_____ Public Rcds

_____ Press

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 2583.

6/21/94

Rodriguez DAC 0730

RECEIVED
FEDERAL ELECTION COMMISSION

FEDERAL ELECTION COMMISSION

94 JAN -7 PM 1:54

JAN 7 11 51 AM '94

Janurary 4, 1994

FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

Attn: Jose M. Rodriguez

Following is a statement that I Want placed in the public record of your file concerning your alligations that you believed I violated 2 U. S. C. # 441f, which file you are now closing. Here is the statement to be placed in said public record:

I was always innocent, as I have stated in all of my past depositions, of any Federal alligations against me. I was unfairly accused and unjustly hounded over the past 6 years, to the great detriment of my physical and mental well being. I resent being subjected to this injustice, and the grief it has caused me as well as the expenditure of time and money I have been forced to spend to recover my physical and mental well being. As a citizen I deplore the flagrant expenditure of taxpayers money. At last I can put this behind me and get on with my life!

I understand that, as a citizen, I can request a copy of my entire file.

I hereby request that you send me complete copies, including F.B.I. files, and of all files that mention or concern me in any way, to the following address:

Robynne D. Phillipsen

6165 Palau Street

Cypress, Calif. 90630

GEORGE PERCEFULL
COMM. # 972225
Notary Public — California
ORANGE COUNTY
My Comm. Expires AUG 26, 1996

STATE of California
County of ORANGE

SUBSCRIBED AND SWORN TO BEFORE ME
THIS 6th DAY OF JAN 1994
George Percefull
NOTARY PUBLIC

Robynne D. Phillipsen
January 6th 1994

Robynne D. Phillipsen

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Robynne Phillipsen
6165 Palau Street
Cypress, California 90603

RE: MUR 2583
Robynne Phillipsen

Dear Ms. Phillipsen:

On June 20, 1988, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441f. On June 28, 1988, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jose M. Rodriguez
Attorney

Date the Commission voted to close the file: DEC 09 1993