



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2606

DATE FILMED 8/26/88 CAMERA NO. 2

CAMERAMAN K.A.U.

88040713374

CCA#9217
-MAY 2606



KAUFMAN PRESS PRINTING

Printing • Typography • Advertising • Paper • Publishing

P.O. BOX 68 SYRACUSE, NEW YORK 13207



May 2, 1988

New York City
Washington, D.C.
Silver Springs, Md.
Louth, Lincolnshire, England
Toronto, Ontario, Canada
Ottawa, Ontario, Canada

Dear Sirs:

a year ago, and a telephone conversation with the Federal Election Commission, I was advised to make a formal complaint regarding a \$50,000.00 campaign debt owed to my corporation Kaufman De Dell Printing, Inc.

This debt was incorporated through the Citizens for the Republic in Santa Monica Calif. on behalf of Ronald Reagan's bid for the Presidency.

I need my money and after some 8 years of efforts, I hope this unpaid debt will get the attention it needs to force payment.

3 8 0 4 0 7 1 3 3 7 5

RECEIVED
FEDERAL ELECTION COMMISSION
MAY 11 1988

88 MAY -6 AM 11:18

RECEIVED
FEDERAL ELECTION COMMISSION
88 MAY -6 PM 2:45

page 2
May 8.

To wit:

J, GARY E. DeDell, Vice President of Kaufman DeDell, Printing, Inc. hereby state that in Oct. of 1978, our corporation received a call from the Citizens of the Republic reserving our machinery & manpower for the race for the Presidential nomination of Ronald Reagan for the year of 1978 in the 1979. They furthered ordered us to reserve and purchase paper stock for the printing, and to set direct mail and delivery service of Campaign literature for the Northeast U.S., and Eastern United States, and to utilize 300 people for the manpower for this distribution.

The agreed upon figure was \$50,000.00 made by a representative of the Citizens of the Republic, and a telephone conversation and in writing.

88040713376

May 2.

Whereupon we invoiced Citizens for the Republic on October 10, 1978 and have never been paid at any time since for this debt.

Supporting documentation is attached. As far as I know this debt was never reported to the FEC. I hereby swear to the above, as truth so help me God, to the best of my knowledge.

88040713377

Signed and sworn before me the 5th day of May 1988.

Diane M. Roock

DIANE M. ROOCK
Notary Public in the State of New York
Qualified in Onondaga County No. 4907132
My Commission Expires September 21, 1989

Gary DeDell

GARY DeDell
P.O. Box 68
Syracuse, NY

13207



KAUFMAN PRESS PRINTING

Printing • Typography • Advertising • Paper • Publishing

P.O. BOX 68 SYRACUSE, NEW YORK 13207



New York City
Washington, D.C.
Silver Springs, Md.
Louth, Lincolnshire, E
Toronto, Ontario,
Ottawa, Ontario, (

October 21, 1987

Dear Mr. Robertson:

After much trouble in trying to locate you and getting you to answer my letter from two years ago, and after meeting with the White House aide to President Reagan & the Chief Counsel of the NRC, I have finally been able to locate you and have been told you can settle this outstanding debt for the Citizens for the Republic.

I have further been told by the Federal Election Commission that I should make an affidavit for a formal complaint against the Citizens for the Republic & the NRC for not listing this Campaign debt.

88040715378

for the Republic the woman director
invited me to sue them for this
debt and to go to the newspapers in
a witnessed telephone conversation.
In fairness to President Reagan &
because I do not believe the woman
director was fully cognizant of the
facts, the publicity, or perhaps reality,
I am writing you this one last time
before I do the above.

I have contacted a lawyer in
Los Angeles and another in Washington
who will gladly act on my behalf if you
make this necessary.

I am hand delivery this as I am
in Washington to get this settled one
way or another.

GARY DeDell
KAUFMAN PRESS PRINTING
PO. BOX 68
SYRACUSE, NY
13207
(315) 471-1817
(301) 654-5552

8 8 0 4 0 7 1 3 3 8 0



KAUFMAN PRESS PRINTING

Printing • Typography • Advertising • Paper • Publishing

P.O. BOX 68 SYRACUSE, NEW YORK 13207



October 7, 1987

New York City
Washington, D.C.
Silver Springs, Md.
Louth, Lincolnshire, England
Toronto, Ontario, Canada
Ottawa, Ontario, Canada

Dear President Reagan:
Dear Citizens for the Republic:
Dear National Republican Committee:

The Federal Election Commission has advised me, and I quote, " Committee's are required to continuously disclose on each report, the amount and nature of outstanding debts, an obligations including these that are in dispute, until such debts are extinguished." Because you did not report at anytime your \$50,000.00 obligation to my company, I will make an affadavit of complaint if I do not receive an answer of my numerous letters of the past years, and an arrangement to settle monies owed within 10 days from the date of this letter.

I will await your answer.

Sincerely

Gary DeDell

8 3 0 4 0 7 1 3 3 8 1

June 1, 1987

Dear Mr. Braden:

Enclosed you will find our invoice and supporting documentation for a debt incurred by Citizens for the Republic, with coordination with the NRC on behalf of Ronald Reagan's bid for President.

Please attend to this invoice immediately.

Thank you
Sincerely

Gary DeBell

89040713383



KAUFMAN PRESS PRINTING

Printing • Typography • Advertising • Paper • Publishing

P.O. BOX 68 SYRACUSE, NEW YORK 13207



Nov. 04, 86

Dear

New York City
Washington, D.C.
Silver Springs, Md.
Louth, Lincolnshire, England
Toronto, Ontario, Canada
Ottawa, Ontario, Canada

Several years ago, We were requested by Mr. Glenn Mosher of the Citizens of the Republic to avail our facilities for the Presidency of Ronald Reagan's campaign.

This was to be done for a \$50,000. fee. This money was to be paid up front. We bought stock, & reserved our manpower, & machinery for them. This Santa Barbara firm never paid us.

We have been jerked around & given various stories, such as Mr. Mosher was just a clerk. He has written us on his stationary & made several phone calls to our firm. I am sure he is not a clerk.

Sincerely,

Gary

Gary De Dell
1010 Turtle St.
Syracuse, New York
13208

88040713384

315/471-1817

14 July, 1986

Senator Paul Laxalt,
US Senator
US Senate
Capitol Hill, 323A ROB
Washington, DC 20510

Dear Senator Laxalt:

Thank you for your letter. I appreciate your response, but I am afraid I do NOT understand. As the very nature of this matter is an embarrassing and sensitive situation for the Republican Party, and as both your name and the President appear on the correspondence we have had with the Cfr and appear as well on the printed material for them, members of your staff (as outlined in my previous letter to you) thought you would be concerned and want to be apprised of the situation.

I do NOT want to embarrass anyone. All I want is this organization and those connected with it to pay their bills, money that is long overdue, and which we have gotten nothing but a run around when we tried to collect it. This is a fine state of affairs for a staunch supporter of our Party and this money is something we literally cannot afford to forget. It was my hope that because you were connected with this group WHEN this money was spent on their behalf, that you, out of conscience, would try to help us collect it.

I expect your help and I hope you believe that it is now a matter you should concern yourself with.

May I hear from you at your earliest? Thank you.

Geryd. DeDeu

88040713385

PAUL LAXALT
NEVADA

COMMITTEE ON APPROPRIATIONS
COMMITTEE ON JUDICIARY

United States Senate

WASHINGTON, DC 20510

WASHINGTON OFFICE:
323A RUSSELL OFFICE BUILDING
(202) 224-3542

CARSON CITY OFFICE:
705 NORTH PLAZA STREET
(702) 883-1930

LAS VEGAS OFFICE:
300 LAS VEGAS BLVD., SOUTH
(702) 388-8547

RENO OFFICE:
300 BOOTH STREET
(702) 784-8588

July 1, 1986

Dear Mr. DeDell:

Thank you for your recent letter regarding your dispute with the Citizens for the Republic.

I have not been involved with the CFTR in an official capacity for years. Therefore it would be inappropriate for me to become involved in this matter. I hope you understand.

Again thank you and best wishes.

Sincerely,



PAUL LAXALT
U.S. SENATOR

PL/lbk

Mr. Gary J. DeDell
Kaufman Press Printing
P.O. Box 68
Syracuse, NY 13207

880407133886

315/471-1817

20 June, 1986

Senator Paul Laxalt
U.S. Senate
Capitol Hill
Washington, D.C. 20510

PERSONAL CERTIFIED MAIL

Dear Senator Laxalt:

I am writing you at the request from your aide regarding an unpaid balance owed our firms (the above and Kaufman DeDell Printing, Inc.) The enclosed material should be an index to the funaround we have received as well as establishing our claim. *(Messrs. J. Young, D. Lloyd) G. Ferraro)

We have written Mr. Curtis Mack and Mr. Robertson. Mr. Mack was Executive Director until he was given a position in Washington, Mr. Robertson was supposed to be their legal counsel, but despite his letter, he is not listed in Washington, D.C. with the telephone Co., nor the telephone information assistance, nor the Bar Assoc.

Mr. Mack's replacement with the Citizens' for the Republic has invited us to sue them, and that is the reason for my letter. I am asking your help in the collection of this money that is owed our firm. Because your name and President Reagan's name are associated with this group, we would not want to embarrass them. We can prove Mr. Mosher's offer and purchase, we have correspondence from him with his name on their stationery (which would disprove their contention that Mr. Mosher was a mere clerk). The fact that he would be ordering work from our firm seems unlikely if he were a clerk, yet he called us, wrote us, and received our correspondence. *(Don't have her name in front of me, but believe it's Wendy Rochertel)

The new executive director of the Citizen's for the Republic has invited us to go to the media, and I find that not a responsible suggestion.

This has dragged on far too long, and I ask and implore your discretionary help now to resolve this matter which is too costly to forget.

I ask that all contact be done via the mails. As I am difficult to reach and believe writing is much more definite than talk which cannot be proven).

Very sincerely yours,

Gary J. DeDell
GD/mo
CC

*(Messrs. J. Young, D. Lloyd) G. Ferraro)

88040713387

March 19, 1956

Dear Ms. Borchardt:

It has been two months since we wrote you on January 6th, and we have not had the courtesy of a reply.

We would appreciate a response within the next 10 days. Because this matter had dragged on for such a long time, at such a considerable expense to us, failing a response, we will be forced to take the Senators advice to contact the media, risk going "public", and go to a collection attorney for satisfaction.

Sincerely,

Gary J. DeDell

88040713388

January 6, 1986

Dear Ms. Executive Director:

9
C As we have written previously to Mr. Mack in May of 1985,
3 and to Mr. Robertson in June and July of 1985, we are concerned
3 with the committment made by Mr. Glenn Mosher.

1 It seems highly unlikely that Mr. Mosher would have been able
to get our phone number, or been given our phone number, if
7 he was a "mere clerk" as Mr. Robertson says. We find it further
0 unusual that a mere "clerk" would have his own stationery or
4 would go to the expense of producing his own stationery. In
our telephone discussion of the later part of last week, you
C invited us to sue you, i.e.: The Citizens For The Republic. As
C Mr. Reagan's name appears on your correspondence as Chairman,
Founder, and/or Chairman Emeritus, we had hoped to settle this
matter amicably, without the Courts, and without publicity.
For that matter, we had assumed from the promotional material
received (jewelry and metal tags, etc.) as well as the news-
letters that we were asked to print and mail that the then
Honorable Ronald Reagan was the purpose of said promotional
material.

Additionally, talking with Mr. Nofziger's office in Washington,
Senator Laxalt's office, and the persona of those offices, it
was felt that this matter be held "low-key" and be handled
via arbitration and correspondence.

Perhaps if you would have Mr. Robertson contact us with a phone

number that is in order in Washington, D.C. and an address that he will respond to our letters from, perhaps we can move this from an impasse to a satisfactory conclusion for all concerned. I am enclosing a copy of our letter to Mr. Robertson which has gone unanswered for some 6 months and we wish to advise you that the telephone number that Mr. Mosher gave us for Mr. Robertson has not been in service since we first tried to contact him in June. Further efforts to find Mr. Robertson through Directory Assistance, the Public Library in Washington, and the Bar Association have proved fruitless.

Lastly, Mr. Glenn Mosher's stationery that he has sent us was postmarked on a meter machine that probably belongs to the Citizens For The Republic in envelopes that bore your labels, and envelopes that bore your name and return address and his personal stationery has both his name and the Citizens For The Republic on it as well. I would appreciate hearing from you/and or Mr. Robertson in writing. Thank you.
Sincerely,

Gary J. DeDell
GD/mo

88040713390

RONALD REAGAN
Member and Chairman Emeritus

Citizens for the Republic

LYN NOFZIGER
Chairman

ARTHUR J. DELLINGER, Jr.
Treasurer

CURTIS MACK
Executive Director

June 21, 1985

Mr. Gary J. DeDell
Kaufman Press Printing
PO Box 68
Syracuse, NY 13207

Dear Mr. DeDell:

This letter is in response to your letter dated June 6, 1985. Please note that all further correspondence regarding this matter should be directed to the undersigned at Citizens for the Republic (address shown below).

As I understand your position as set forth in your June 6th letter, your firm never actually performed any services or provided any goods to Citizens for the Republic. However, you contend that a Mr. Glenn Mosher, purportedly representing Citizens for the Republic, allegedly agreed to pay your firm \$50,000.00 "to reserve our (Kaufman Press) resources."

You referenced telephone conversations which allegedly occurred in September and October of 1978, and correspondence which was sent to you by Citizens for the Republic in October, 1978, which allegedly embodied an "agreement" with your firm. As I previously advised you, Citizens for the Republic has no record of any such telephone calls or correspondence. Thus please send me a copy of the October, 1978 correspondence which you referenced.

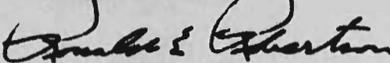
7831490

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All further correspondence relating to this matter should be directed exclusively to the undersigned.

Sincerely,

CITIZENS FOR THE REPUBLIC


Ronald E. Robertson
General Counsel

RER/cjr

88040713392



KAUFMAN PRESS PRINTING

Printing • Typography • Advertising • Paper • Publishing

P.O. BOX 68 SYRACUSE, NEW YORK 13207

6 June, 1985



Ref.: Your letter of 4th June, instant

York City
ington, D.C.
Springs, Md.
Lincolnshire, England

Dear Mr. Robertson:

Thank you for your letter.

I shall answer it, although I don't understand why things are unclear and bewildering to you.

If you would read the copies I sent you, there can be no question that the request for our services was from the Citizens for the Republic. (However, we heard from Mr. Sears/his staff and they are from the Reagan for President Committee. Yet, the only correspondence we had and prior conversations was with the Citizens for the Republic, so THERE IS a connection, apparently.)

The services that were ordered were by Mr. Glenn Mosher by phone in September and October of 1978 and by correspondence in October, 1978. What was requested was the retainment of our firm to do political type work and utilize our facilities to eventually supply the northeast section of the US. The understanding from the beginning was a \$50,000. retainer fee, or up front money. We could offer letterpress, offset, camera, layout, ad work, bindery, typesetting, as well as distribution of literature by hand or by mail. The things that we were asked to handle were typesetting, newsletters, mailings, fund raising (letters), and our capabilities for printing bumper stickers, posters, and brochures (yes we were capable of producing same). We have had vast experience in doing work for political causes and parties.

We assumed that Mr. Sears was from the Citizens for the Republic because we had no contact with anyone via phone or letter at that time from any Reagan for President Committee (altho later when we lost Mr. Mosher's name we tried to find out who he was via Senator Laxalt, but again as a result of the Citizens for the Republic.) Mr. Mosher called us, we believe your phone records will verify this as I suggested to Mrs. Stockdale in the year following when we were trying to track down the party whose name we lost (Mr. Mosher).

Terms were to be \$50,000 up front (never received). ~~_____~~

~~_____~~
~~_____~~
~~_____~~

- You say the Citizens for the Republic has no record: ask Mr. Mosher, check you correspondence copies, check your phone bills and phone memoranda.

- Understand that this agreement was for availing our firm to you and the payment of \$50,000. to reserve our resources. Your organization never fulfilled the obligation made by Mr. Mosher.

Page 2---6 June, 1985 Mr. Robertson

Md.
shire, England

Also to refresh Mr. Mosher's memory, remind him that he spoke with me.

I hope this removes the bewilderment.

I find that you are not at the address on your letterhead. The address on your letterhead had a phone number in Washington but no address. Neither you nor an office for the Citizens for the Republic are listed with the directory or information assistance in Washington. I, therefore am directing this letter to Mr. Glenn Mosher in Santa Monica and hope that it reaches you. (The telephone number supplied was unanswered in two tries for 15-20 rings in the afternoon of today's date.)

Glenn Mosher
6/11/85

88040713393

LYN NOFZIGER
Chairman

ARTHUR J. DELLINGER, Jr.
Treasurer

CURTIS MACK
Executive Director

June 4, 1985

202 783 1492

Mr. Gary J. DeDell
Kaufman Press Printing
P.O. Box 68
Syracuse, New York 13207

Dear Mr. DeDell,

Your letter dated May 11, 1985, addressed to Mr. Curtis Mack, Executive Director of Citizens for the Republic has been referred to me for response.

It is completely unclear to me as to whether the commitment which you allege was made to your firm sometime in 1979 was made on behalf of Citizens for the Republic or the Reagan for President Committee. These organizations were completely separate and distinct and Citizens for the Republic is in no way responsible for any commitments which may have been made on behalf of the Reagan for President Committee. Incidentally, the Reagan for President Committee has long since terminated its existence.

Before we can even begin to evaluate your purported claim we will need a great deal more information regarding this alleged commitment, e. g., a) specifically who ordered what and when was the order placed; b) what committee was represented by the individuals with whom you spoke; c) what work, if any, was actually performed by your firm; d) what were the volumes and terms to have been; and e) what were the purported compensation arrangements.

You indicated that your firm actually acquired stock and did printing pursuant to this alleged commitment. Citizens for the Republic has no record or knowledge of any such activities by your firm on its behalf. Therefore, if you have any evidence supporting this contention please provide it.

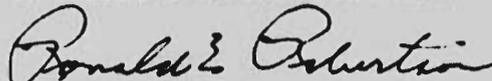
At this point we are totally bewildered by your correspondence. However, we will carefully review this matter after we have received a detailed response to the above inquiries.

88040713394

Mr. Glenn Mosher, who was previously employed by Citizens for the Republic in a clerical position, has not been associated with Citizens for the Republic since 1978. Citizens for the Republic has no knowledge of his present whereabouts.

Sincerely,

CITIZENS FOR THE REPUBLIC



Ronald E. Robertson
General Counsel

88040713395

315/471-1817

11 May, 1985

Dear Mr. Mack:

Per. both our telephone conversation and the directions of Senator Laxalt's office, Dave LLOYD, and Lyn Nofziger's office I am enclosing copies of correspondence that goes back to the Citizen's for the Republic era and the Reagan campaign for president.

As you will see, the crucial question was who gave us this authorization. As the letter from last year explains we were without the advice of the two names (Mrs. Mosher and Sears) until last year, 1984.

When we found those we were told to direct the correspondence to Sen. Laxalt and then some six months passed before Mr. David Lloyd looked into the matter, put me in touch with Lyn Nofziger and from that office to you.

As the letters should explain we were put at great financial stress to incorporate the additional stock for newsletters, mailings and posters,; personnel and allocated machinery to do this printing and to ready ourselves for mailing. As we had explained to Mr Mosher, we needed up front money as we had been burned by a couple of candidates in 1978 who ran for Congress and for Governor. To date Mr. Mosher and Mr. Sears have never sent this promised money to cover these expenses and it is long overdue and needed. I understand from previous correspondence from you that only Mr. Nofziger may have been the one to do this authorization, but that does not excuse the fact that we were never told that at the time, nor does it explain why Mrs. Mosher (particularly) and Mr. Sears asked for our help and why we were told specifically what was in mind for our shop & its personnel to perform for your organization: mailings, posters, newsletters, etc. etc. at least for the Northeast region, etc. If (as it turned out) we were not utilized) why were we notified and why were we not paid as promised? Why did Ms. Stockdale not have record of Mosher's and Sear's promises?

It is of little consequence as to whether these people had your authorization or not. The fact is we are out this money and need reimbursement as soon as possible.

Thank you.

Sincerely,

Gary J. DeDell

88040713396

Dave Lloyd 202-863-8690
office

November 12, 1984

Dear Senator Laxalt,

Over the past few years, we have had correspondence with your office, Senator Hatch, Mrs. Kathleen Stockdale and Curtis Mack. The correspondence regarded a verbal commitment made by the Citizens Republic Committee in Santa Monica. It concerned a promise made in September and the subsequent months in 1978 and into 1979, for doing printing, typesetting and other allied graphic arts functions for the Citizen for the Republic and the subsequent Reagan Election Committee. Correspondence from Senator Hatch, Mr. Mack and Mrs. Stockdale, indicated they could find no record of anyone promising us this work with an upfront retainer fee of 50,000. dollars.

I have found in the past few weeks records of these telephone calls, and some correspondence. These commitments were made by two people, Mr. Glenn Hoshier by phone and by correspondence and by

88040713397

November 12, 1984

Mr. John Sears. Although we geared up at great expense with stock, manpower, supplies, scheduling, and the availability of machinery-we never received the 50,000. dollars and only received samples of printing. Re: lab fees, notes, stationary, and two different types of newsletters.

Is there anything you can do to see that we are given some type of reimbursement for the expenses incurred on behalf of these committees?

Thank you.

Sincerely,

Gary DeDell

83040713398

July 2, 1979

Dear Mr. Mack:

I am in receipt of your June 7th letter, and we are completely stunned by it's contents.

I am interested in knowing whether you have bothered to check your long-distance telephone records. From this, have you traced the caller's name? The caller obviously had some authority, or he would not have been able to intercept my correspondence, and answer it. Further, judging by the number of phone calls placed, it would again be safe to assume that he had some authority.

We have not heard from the Reagan For President Committee. Could you indicate when we might expect a contact, and who the person would be that has the authority necessary?

Needless to say, this faux pas has cost us considerable time, talent and money. I hope this can be repaired.

Sincerely yours,

Gary J. DeDell

38040713399

KAUFMAN PRESS PRINTING
1715 Teall Avenue
Syracuse, N.Y. 13206
(315) 463-5439

May 29, 1979

Dear Mrs. Stockdale:

I am in receipt of your May 23rd letter.

Let's start at the beginning. In September and October I received a couple of mailings regarding jewelry from the Citizens For The Republic. This was in response to an earlier request from them to which I had responded indicating my support for their committee and wishing to be placed on their mailing list and wishing to receive their news letter. In September and October I had responded to the jewelry request and stated that we would be willing to do their printing (The Citizens For the Republic), along with their advertising and mailing at cost. I further stated that we would be willing to display their jewelry, along with order blanks. We would neither take contributions, nor would we forward them. We would just display the merchandise, and offer any interested parties the order blanks and they could write directly for said jewelry, making their contributions to the California office.

In response to my letter of doing the graphic services at cost, a phone call was placed first to my home and then to my business twice. As I explained, because we moved, we have misplaced the gentleman's name that called. However, he was either the campaign manager or the liaison manager in charge of publishing for Mr. Reagan's Campaign for office. He was quite interested in utilizing our firm for doing campaign work, printing, mailing, and perhaps advertising. We would be using Syracuse as a center, he explained, for the Northeast Region and perhaps for the Eastern Seaboard.

As we had conversed, we presented information to him that we had a group of approximately 100 people which would be used for distribution, organization, and general campaign workers. Most of these people were paid, as we found that volunteers were few and far between those days. His idea was that these people would serve as a nuclei for the region or at least for New York State. Further, our firm, as I stated, would handle the printing of leaflets, stickers, posters, brochures, and various other campaign material. Work was to start as soon as Ronald Reagan made his announcement to run for National Office. This gentleman explained that such an announcement would take place on or about the 1st of January, 1980. He indicated that he would be back to me on the phone to coordinate the needs for this area under the direction of the committee in California.

88040713400

KAUFMAN PRESS PRINTING
1715 Tech Avenue
Syracuse, N.Y. 13206
(315) 463-5439

May 23, 1979

Dear Senator Hatch:

Thank you for your letter of May 14 which I received today. I am quite surprised that Senator Laxalt stated that I had not replied to his letter.

I personally wrote him over a month and a half ago (copy enclosed). In that letter, you will note, we offered our services for printing, mailing, and advertising at cost. We were contacted by the Reagan Committee last fall by its chairman. At that time he indicated that there would be work for us starting in the 1st of January as soon as Ronald Reagan had made a formal announcement.

Our offer still stands. But, despite three letters, we have not received the "Blush Fund" since the committee's phone call to us five or six months ago. I firmly support Mr. Reagan and his policies, but time is wasting.

Would you personally take it upon yourself to see that the proper people reply this time so that we can get this political work started so that it will be ready for distribution. Our plant will be happy to cost estimate and do all that is within the Continental United States.

Sincerely yours,

Gary J. DeBorja

Enc.

88040713401

Ms. Kathi Stockdale
1253 7th Street --
Suite 200
Santa Monica, Calif.

Mr. Gary DeDell
1715 Teall Ave.
Syracuse, N. Y.
May 16, 1979

Dear Ms. Stockdale:

About two months ago, I had responded to your letter of February 9th. I have not had the courtesy of a reply although at the time I had indicated that from the original arrangements that had been made in November, the payment was overdue on the deposit that was promised. Further, the samples that had been promised have yet to be received. As of this date, there has been no plan mapped out as to what type of literature or coverage the Committee wishes us to maintain. It was generally discussed on the phone that we were to be responsible for the NorthEast region. The responsibilities would be: printing, campaign organization, advertising, mailing, and intermediate coordination with your national headquarters. As we had stated at the time, we were going to do this at cost.

But whether we handle the Northeast, or the entire Eastern Seaboard, time is wasting. As our group has found out, and I am sure it's been your experience, losing time can cost an election or a primary. As I had written to you earlier, our new address is at 1715 Teall Avenue, Syracuse, New York, 13206. Our new phone number is Area Code: 315-435-1329.

We would be happy to meet you in Syracuse, or anywhere else in the Continental United States to get this part of the campaign off the ground. We hope to hear from you soon.

Thank you very much.

Sincerely yours,

Gary J. DeDell

GD/lj

88040713402



Kaufman De Dell Printing, Inc.

812 North State Street P. O. Box 126 Syracuse, N. Y. 13208

(315) 422-4689 — 422-4899

Ms. Kathi Stockdale
1253 7th Street
Suite 200
Santa Monica, Calif.

Mr. Gary DeDell
1715 Teall Ave.
Syracuse, N. Y.
March 27, 1979

Dear Ms. Stockdale:

In response to your letter of February 9, I had written the Citizens of the Republic last fall. At that time, I offered to do printing, mailing and advertising for the C.F.T.R. AT COST. Subsequently, the Campaign Manager called me and indicated that come the first of January, after Mr. Reagan announced his candidacy, that indeed they would want us to handle their campaign needs at least for the Northeastern region, if not for the entire Eastern Seaboard.

Subsequently, we have undergone a move which has changed our address and our phone number. Inadvertently, in the move, we have lost the name of the gentleman that phoned us. At the time we talked, I had asked for samples of the various campaign jewelry that the C.F.T.R. has and stated that we would like to display it. I explained that we would make no sales nor take any orders.

We would have on hand a stock of your order/donation blanks and any interested parties would write direct to your office to make contributions for this jewelry.

As I had explained to your representative, we have had experience printing for the National Republican Party, the state and local offices of both parties and have had printing requests from various candidates for both houses of Congress. We do advertising; do all kinds of printing for every imaginable purpose for campaigns.

Last year was a very bad year and we have been hurt immensely by non-payment from congressional and gubernatorial candidates. For this reason, it was arranged that there would be a deposit made during the month of January for the regional needs of the C.F.T.R. which we would handle. Our original statement was in the vicinity of \$50,000.00. If you have any questions, please feel free to call or write. We stand ready to serve you. Thank you very much.

Best regards,

Gary DeDell

OUR NEW ADDRESS:
KAUFMAN PRESS PRINTING
1715 Teall Avenue
Syracuse, N.Y. 13205
(315) 422-4689

1j/GD

*Reagan for Pres.
Sen Paul Cayah
Suite 407
2210 W. 1st
Syracuse, NY*

R 3 0 4 0 7 1 3 4 0 3

October 27, 1978

Dear Mr. Mosher:

Thank you for your note and your package of samples dated the 18th.
Please detail the requirements for the Newsletter and the Political Update.
Do we typeset, or would it be camera-ready?

What will be the quantity per issue of each?

What size envelopes and how many of each should we stock up on?

Our post office box number is 186, Syracuse, N.Y. 13208. Please respond to that address.

Thank you.'

Sincerely,

Gary J. DeDeM
Vice President

88040713404

October 11, 1978

Dear Mr. Mosher:

It was good talking with you on the telephone, and this will confirm our conversation.

We shall be happy to establish our facilities on-line for the Citizens for the Republic. Per the equipment list that I previously sent you and our discussions, we shall reserve manpower and machinery in the typesetting, lay-out, camera, plate-making, offset press, letterpress, bindery and direct mail departments.

As soon as we receive the samples we shall obtain stock for the newsletters, envelopes, brochures, and posters that you indicated that you will require our services for.

As a explained to you, we will require the \$50,000.00 up front money to reserve this machinery, manpower, time, and stock for your requirements. We have been stung in the past few months as I explained by the Republican Governor-hopeful and candidates for the Senate, Congressional and Gubernatorial Primaries. Enclosed is an invoice and we ask that it be attended to at your earliest convenience. All of us here thank you for this opportunity, and we await your direction as to how we shall serve you.

Very Sincerely Yours,

Gary J. DeBell
Vice President

88040713405

October 10, 1978

Glen Kneher

10789

10789

Citizens for the Republic
1253-7th Street, Suite 200,
Santa Monica, California. 90401

10789

RETAINER FEE for the reserve of typesetting, camera,
lay-out, plate-making, offset press, letterpress, bindery,
and direct mail departments.

50,000.00

\$50,000.00

\$50,000.00

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88040713407

From The Desk Of
GLENN MOSHER

Mr. De Dell:

Thank you for your offer to help us
cut with our printing needs. It is
the kind of support that we have

Once again, thank you for your offer.



Citizens for the **Republic**

POLITICAL

1233

JP ↑ DATE

from CFTR

September 1978

Hon. Ronald Reagan
Chairman
Sen. Paul Laxalt
Chairman,
Steering Committee

Sen. Paul Laxalt
Chairman,
Steering Committee

401

JP ↑ DATE

from CFTR

AUGUST 1978

Chairman,
Steering Committee

San Francisco, California 90401

JULY 1978

from CFTR

June 1978

Hon. Ronald Reagan
Chairman
Sen. Paul Laxalt
Chairman,
Steering Committee

8 0 4 5 1 7 0 4 0 8 8

**Citizens ^{for} the Republic
Newsletter**

October 16, 1978

Vol. II, No. 16

1253 7th Street Suite 200 Santa Monica California 90401 213 451-8548

**Citizens ^{for} the Republic
Newsletter**

September 18, 1978

Vol. II, No. 16

1253 7th Street Suite 200 Santa Monica California 90401 213 451-8548

**Citizens Republic
Newsletter**

September 1, 1978

Vol. II, No. 15

**Citizens ^{for} the Republic
Newsletter**

October 1, 1978

Vol. II, No. 17

1253 7th Street Suite 200 Santa Monica California 90401 213 451-8548

**'My roommate
and I
use Food Stamps
and they
really help?**

(Page 3)

88040713409

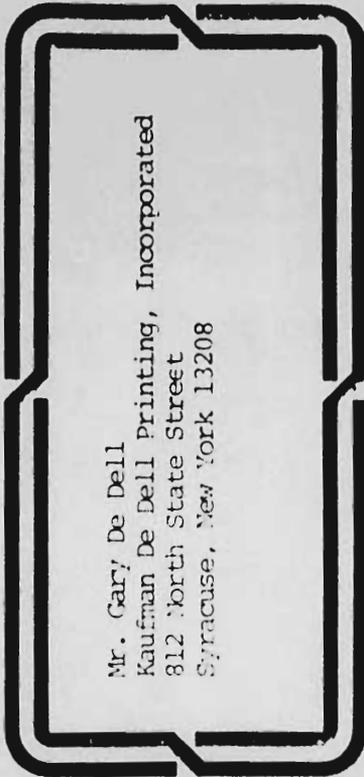
8 8 0 4 0 7 1 3 4 1 0

FIRST CLASS

Citizens ^{for} _{the} Republic

1253-7th Street, Suite 200, Santa Monica, California 90401

Mr. Gary De Dell
Kaufman De Dell Printing, Incorporated
812 North State Street
Syracuse, New York 13208



FIRST CLASS

FIRST CLASS

Handwritten signature



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 17, 1988

Mr. Ronald E. Robertson
c/o Citizens For The Republic
1253 Seventh Street
Suite 200
Santa Monica, CA 90401

RE: MUR 2606
Citizens For The
Republic

Dear Mr. Robertson:

The Federal Election Commission received a complaint which alleges that Citizens For The Republic may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2606. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against Citizens For the Republic in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(12)(A) of Title 2 unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

83040713411

If you have any questions, please contact Janice Lacy, the attorney assigned to this matter, at (202) 376-5690. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel



By: Lois G. Lerner
Associate General Counsel

Enclosures

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

38040713412

plm



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 17, 1988

Mr. Gary J. DeDell
Kaufman Press Printing
PO Box 68
Syracuse, NY 13207

RE: MUR 2606

Dear Mr. DeDell:

This letter acknowledges receipt of your complaint, received on May 6, 1988, alleging possible violations of the Federal Election Campaign Act of 1971, as amended (the "Act"), by Citizens For The Republic. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 2606. Please refer to this number in all future correspondence. For your information, we have attached a brief description of the Commission's procedures for handling complaints. If you have any questions, please contact Retha Dixon, Docket Chief, at (202) 376-3110.

Sincerely,

Lawrence M. Noble
General Counsel

By: Lois G. Lerner
Associate General Counsel

Enclosure
Procedures

38040713413

6CC#9524

RONALD REAGAN
Founder and Chairman Emeritus

Citizens for the Republic

LYN NOFZIGER
General Chairman

ANGELA M. (BAY) BUCHANAN
Acting Executive Vice Chairman

Lois G. Lerner, Esq.
Associate General Counsel
Office of the General Counsel
Federal Election Commission
Washington, D.C. 20463

Subject: MUR 2606 -- Citizens for the Republic

Dear Ms. Lerner:

As the Acting Executive Vice-Chairman, I am writing on behalf of Citizens for the Republic ("CFTR"), a multi-candidate political committee duly registered with the Federal Election Commission ("Commission"), in reference to the above-noted complaint filed by Gary J. De Dell, Vice President of a printing company known variously as Kaufman Press Printing, and Kaufman De Dell, Printing, Inc. (hereinafter referred to as "Kaufman").¹ According to the complaint, Mr. De Dell claims that CFTR entered into a contract with his company to provide certain printing services in October 1978, that the agreed upon retainer to reserve the equipment was to be \$50,000, that CFTR never made any payments to Kaufman and that consequently, CFTR was, and remains, indebted to Kaufman in that amount. De Dell further notes that this alleged indebtedness was never reported to the Commission by

¹ There is serious reason to doubt the legitimacy of Kaufman. Specifically, in his affidavit, Mr. De Dell notes that Kaufman is an incorporated entity and that its name is Kaufman De Dell, Printing, Inc. However, the cover letter accompanying the complaint indicates that the true name of the entity is Kaufman Press Printing. The letterhead fails to contain any indication that the entity is in fact incorporated. Moreover, the letterhead indicates that the entity has offices in "Silver Springs [sic], Md." and "Washington, D.C." Yet, neither the Washington, D.C. nor Montgomery County telephone directories contain a listing for such an entity. Moreover, much of the correspondence from Mr. De Dell is on plain, non-letterhead, paper or on paper with an address stamp. Lack of a formal letterhead would perhaps be excusable if one were dealing with a plumber or electrician, but where the entity is supposed to be a printing company, the lack of a letterhead raises a serious issue as to the legitimacy of the entity.

HAND DELIVERED

88 JUN 15 AM 9:47

FEDERAL ELECTION COMMISSION

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88 JUN 15 AM 11:52

RECEIVED
FEDERAL ELECTION COMMISSION

CFTR.

We firmly believe that the complaint is totally without merit and should be dismissed forthwith for a variety of reasons. First, the so-called contractual dispute between CFTR and Kaufman is a commercial dispute and as such, not appropriate for resolution by the Commission. Second, no contract, express or implied, ever existed between Kaufman and CFTR. Thus, CFTR was never indebted to Kaufman in any amount and hence not required to report such in its filings with the Commission. And third, CFTR never received anything of value from Kaufman and hence, was not required to report such with the Commission.

Complaint Involves a Commercial Dispute and Ought Not to be Entertained by the Commission

I believe it is important to put this matter in perspective. CFTR views this matter as nothing more than a longstanding commercial dispute, involving a frivolous claim for money. The Commission has consistently refused to permit its procedures to be used for resolving commercial disputes. For instance, in Advisory Opinion Request 1984-58, the Commission was asked by a putative creditor of a political committee to resolve "whether the committee did in fact, incur the subject expense on the basis of the various communications that occurred between city personnel and committee personnel, or on any other basis." In refusing to resolve the issue, the Commission stated:

As indicated above with respect to issue (1) [whether a contract existed between the city and committee], the Commission does not have authority to decide if an expense was incurred where that decision necessarily requires a determination of the validity of a claim asserted by a putative creditor of a candidate or political committee.

Advisory Opinion 1984-58

As the exhibits attached to the complaint indicate, this matter has been the subject of dispute for almost a decade. During that period, CFTR investigated the matter fully and found that Mr. De Dell's allegations were totally without merit. Indeed, Mr. De Dell has neither provided CFTR with a duly executed contract, as none exists, nor has one been annexed to the complaint. Moreover, Mr. De Dell has had ample opportunity to vindicate his rights, if indeed any such rights exist, by filing suit against CFTR. However, he has chosen not to take this course of action. Incidentally, in this regard, I have been advised by counsel that the statute of limitation has long since run. In short, this is a frivolous commercial claim and not appropriate for resolution by the Commission.

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No Contract Ever Existed Between CFTR and Kaufman and Hence No Reportable Debt Owing to Kaufman Ever Existed

It is abundantly clear after reading the materials annexed to the complaint that CFTR neither entered into any form of contract with Kaufman nor made any commitment to do so. Indeed, it is not altogether clear from the records that Kaufman was in fact dealing with CFTR. Specifically, in a letter to Ms. Kathi Stockdale dated March 27, 1979, Mr. De Dell stated:

At that time, I offered to do printing, mailing and advertising for the C.F.T.R. AT COST. Subsequently, the Campaign Manger called me and indicated that come the first of January, after Mr. Reagan announced his candidacy, that indeed they would want us to handle their campaign needs at least for the Northeastern region, if not for the entire Eastern Seaboard.

In any event, what emerges from the documents is that De Dell apparently offered to do printing for CFTR, but that offer was never accepted. Indeed, there is one piece of documentary evidence that may have indicated beyond doubt that no contract existed; however, Mr. De Dell apparently redacted the salient provisions of that note. Specifically, in an undated note from Glenn Mosher to Mr. De Dell, which the complainant attached to the complaint, Mr. Mosher stated: "Thank you for your offer to help us out with our printing needs. It is . . ." "Once again, thank you for your offer." The vast majority of the note has been redacted, apparently by Mr. De Dell. However, the last line of that note is telling; it thanks Mr. De Dell for his "offer," but does no more. On its face the note most certainly does not accept Mr. De Dell's offer, and even if it did, Mr. Mosher lacked such authority.

In addition, even Mr. De Dell's letter to Mr. Mosher of October 11, 1978, indicates that no contract existed. Specifically in that letter, Mr. De Dell states:

As a [sic] explained to you, we will require the \$50,000.00 up front money to reserve this machinery, manpower, time and stock for your requirements. We have been stung in the past few months . . .

In short, that letter substantiates that at most what existed was unilateral offer by De Dell to perform printing services, but that that offer was never accepted. Specifically, the letter indicates that De Dell had no intention of reserving any equipment, purchasing any stock or taking any other related actions until he received the so-called up-front money. The fact that he never received the so-called up-front money is conclusive

evidence that the unilateral offer was never accepted.

From the outset of this dispute, CFTR has consistently asked Mr. De Dell to provide any documentary evidence that he might have to support the existence of a binding contract. See, e.g., letter attached to complaint from Ronald E. Robertson to Mr. Gary J. De Dell, dated June 21, 1985. Mr. De Dell, however, has consistently failed to provide any such documentary evidence.

When all is said and done, what emerges is a sad tale of an alleged individual printer who deluded himself into believing that he had secured a major political committee as an account. It is difficult to envision any set of circumstances under which CFTR would have made a \$50,000.00 downpayment for printing services to a printing company with no established record and whose own letterhead is rife with typographical errors. This is not the first time that organizations, such as CFTR, that are or were associated with a sitting President have been the targets of baseless requests for money.

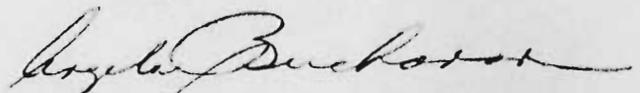
CFTR Never Received Anything of Value from Kaufman

As demonstrated above, no contract--express or implied--ever existed between Kaufman and CFTR. Moreover, CFTR never received anything of value from Kaufman. As De Dell's own exhibits indicate, he never performed any printing for CFTR, never distributed any materials on behalf of CFTR and never provided any services to CFTR. As his letter of October 11, 1978, indicates, his services were contingent on receipt of \$50,000 and that money was never paid. In addition, De Dell never claims to have provided CFTR with anything of value. Instead, De Dell's claim for money appears to rest on a theory of "justifiable reliance." However, as discussed above, there was nothing to justify De Dell's reliance, if any such reliance ever existed, as his offer was never accepted.

Conclusion

For the reasons set forth above, the Commission should find that there is no reason to believe that Citizens for the Republic violated any provision of the Federal Election Campaign Act of 1971, as amended.

Sincerely,



Angela (Bay) Buchanan
Acting Executive Vice Chairman

38040713417

FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION

88 JUL 20 PM 3:41

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

MUR NO. 2606
DATE COMPLAINT RECEIVED
BY OGC: May 5, 1988
DATE OF NOTIFICATION TO
RESPONDENT: May 17, 1988
STAFF MEMBER: Janice Lacy

COMPLAINANT: Gary DeDell, on behalf
of Kaufman DeDell Printing, Inc.

RESPONDENTS: Citizens for the Republic
and Carolyn Robertson, as
Treasurer

RELEVANT STATUTES: 2 U.S.C. § 434(b) (8)
11 C.F.R. § 104.11

INTERNAL REPORTS
CHECKED: AO 1976-85
MUR 2521
MUR 2146

FEDERAL AGENCIES
CHECKED: None

I. GENERATION OF MATTER

The Commission received a complaint on May 6, 1988 from Gary DeDell, Vice President of Kaufman DeDell Printing, Inc. The complaint alleges that Citizens for the Republic ("the Committee"), a multi-candidate political committee, failed to report a \$50,000 debt which the Committee allegedly owes to the Complainant.

II. FACTUAL AND LEGAL ANALYSIS

A. Factual Analysis

The Complainant claims that the Committee contacted the Complainant in October, 1978 to reserve and purchase paper stock

EXECUTIVE SESSION

JUL 26 1988

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for printing services, to set direct mail and delivery service of campaign literature for the Northeast and Eastern United States, and to utilize three hundred people for this distribution. The Complainant further claims that the Committee agreed to pay a \$50,000 retainer to the Complainant to perform these services.

The evidence the Complainant offers in support of these allegations is a series of letters dating from 1979, sent by the Complainant to the Committee wherein the Complainant offered to perform certain printing services for the Committee at a cost of \$50,000. The Complainant also sent subsequent letters to the Committee, or its agents, wherein he claims the \$50,000 debt and demands payment. Although the Complainant alleges that Glenn Moser, a former employee of the Committee, ordered the services, the Complainant has failed to produce any evidence of a written contract or written acceptance by the Committee. Rather, the Complainant makes several references to an oral request from Glenn Moser that the Complainant perform the services. Moreover, the only written evidence from the Committee that the Complainant has submitted consists of: (1) an undated note typed on personalized stationery encaptioned "From the Desk of Glenn Moser" thanking the Complainant for his offer, the remainder of which is edited out; and (2) two letters, dated from 1985, wherein the Committee asks the Complainant to produce documents that would support the allegation that the Committee had accepted the Complainant's offer.

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This Office received a response to the complaint from Angela M. Buchanan, Acting Executive Vice Chairman of the Committee, on June 16, 1988. The Committee claims that the complaint is without merit because it involves a frivolous commercial dispute, the outcome of which the Commission should not determine. The Committee notes that the Complainant has failed to produce a written contract, and has waited for the statute of limitations to run on his claim without filing suit.

More importantly, the Committee asserts that no contract ever existed between the two parties and thus no reportable debt ever existed between them. The Committee claims that the Complainant apparently offered to perform services for the Committee, but that the Committee never accepted the Complainant's offers. In support of this claim, the Committee refers to the note from Glenn Mosher to the Complainant, which thanks the Complainant only for his "offer" but does no more (the rest of the note having been edited). Furthermore, the Committee claims it has consistently requested the Complainant to produce evidence of a contract throughout the course of this dispute, but the Complainant has failed to produce any such documentary evidence.

Finally, the Committee claims it never received any services or anything of value from the Complainant; the Complainant does not claim to have provided any services or anything of value to the Committee.

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B. Legal Analysis

The Act requires that each report filed by a political committee must disclose the amount and nature of outstanding debts and obligations owed by or to such political committee. 2 U.S.C. § 434(b)(8). See also 11 C.F.R. § 104.3(d). Furthermore, the Regulations require continuous reporting of debts and obligations until such debts and obligations are extinguished. 11 C.F.R. § 104.11.

In Advisory Opinion 1976-85, the Commission determined that a committee is required to report the amount of a disputed claim as a campaign debt. The Advisory Opinion also stated that a claim was required to be reported even if the validity of the debt was in question. AO 1976-85 has been interpreted to apply to only written contracts; however, it has been viewed that in those situations involving disputed debts where a committee received services from a complainant, the committee must report the amount in dispute as a campaign debt regardless of the existence of any written contract. See MUR 2521 and MUR 2146.

Applying these rules to the present case, we recommend that the Commission find no reason to believe that the Committee violated the reporting requirements by failing to report its disputed debt with the Complainant. First, the Complainant produces no written contract, but at best can only allege that he entered into an oral agreement with the Committee. Even so, the

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Complainant produces no evidence of any oral agreement, but at best can only produce evidence of several written offers to the Committee to perform services. In any event, the Complainant produces no evidence that the Committee ever accepted any of these offers. Therefore, our review of the evidence leads us to conclude that no agreement ever existed between the Complainant and the Committee. Second, the submissions provided by both the Complainant and the Committee contain no evidence that the Complainant ever provided any services to the Committee.

In sum, we have no evidence of a written agreement. Even if it could reasonably be argued that Complainant and the Committee reached an enforceable oral agreement, the Commission's interpretation of the reporting requirements in light of the post-1979 version of the Act is that a disputed debt for which there is no written contract, and in connection with no services were ever received, is not an obligation subject to the reporting requirements of the Act and the Regulations. Therefore, this Office recommends that the Commission find no reason to believe that the Committee violated 2 U.S.C. § 434(b)(8) and 11 C.F.R. § 104.11.

III. RECOMMENDATIONS

1. Find no reason to believe that the Citizens for the Republic and Carolyn Robertson, as treasurer, violated 2 U.S.C. § 434(b)(8) and 11 C.F.R. § 104.11.
2. Close the file.

880407134222

3. Approve the attached letters.

Lawrence M. Noble
General Counsel

July 20, 1988
Date

By: Lois G. Larner
Associate General Counsel

Attachments

1. Response to Complaint
2. Proposed Letters (2)

Staff Person: Janice Lacy

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Citizens for the Republic) MUR 2606
and Carolyn Robertson, as)
Treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 25, 1988, the Commission decided by a vote of 6-0 to take the following actions in MUR 2606:

1. Find no reason to believe that the Citizens for the Republic and Carolyn Robertson, as treasurer, violated 2 U.S.C. § 434(b)(8) and 11 C.F.R. § 104.11.
2. Close the file.
3. Approve the letters, as recommended in the First General Counsel's report signed July 20, 1988.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

7-26-88
Date

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

Received in the Office of Commission Secretary:	Wed.,	7-20-88,	3:41
Circulated on 48 hour tally basis:	Thurs.,	7-21-88,	11:00
Deadline for vote:	Mon.,	7-25-88,	11:00

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 29, 1988

Ms. Angela M. Buchanan
Acting Executive Vice Chairman
Citizens for the Republic
2719 Wilshire Blvd., Suite 200
Santa Monica, CA 90403

RE: MUR 2606
Citizens for the Republic and
Carolyn Robertson as treasurer

Dear Ms. Buchanan:

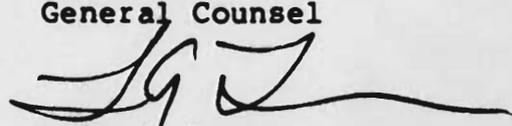
On May 17, 1988, the Federal Election Commission notified Citizens for the Republic ("Committee") of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On July 25, 1988, the Commission found, on the basis of the information in the complaint, and information provided by you, that there is no reason to believe the Committee and its treasurer violated 2 U.S.C. § 434(b)(8) of the Act and 11 C.F.R. § 104.11 of Commission Regulations. Accordingly, the Commission closed its file in this matter.

This matter will become a part of the public record within 30 days. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

Sincerely,

Lawrence M. Noble
General Counsel

By: 
Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

88040713425

flm



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 29, 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Gary J. DeDell
Kaufman Press Printing
P.O. Box 68
Syracuse, N.Y. 13207

RE: MUR 2606

Dear Mr. DeDell:

On July 25, 1988, the Federal Election Commission reviewed the allegations of your complaint dated May 2, 1988, and found that on the basis of the information provided in your complaint, and information provided by Citizens for the Republic, there is no reason to believe that Citizens for the Republic and its treasurer violated 2 U.S.C. § 434(b)(8) and 11 C.F.R. § 104.11. Accordingly, on July 25, 1988, the Commission closed the file in this matter. The Federal Election Campaign Act of 1971, as amended, allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Sincerely,

Lawrence M. Noble
General Counsel

By: Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2606

DATE FILMED 8/26/88 CAMERA NO. 2

CAMERAMAN K.A.U.

88040713427



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO THE FILE IN

MUR 2606

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RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

89 JAN 13 AM 9:08

January 9, 1989

Dear Lois Lerner

In response to your July 29th letter; when I made an appointment to send you the material, your interviewer felt that there was a violation for the non-payment for these bills by the Citizens for the Republic. I dont understand how a political organization can be allowed to not pay its bills. Please advise with answers to the inquiries.

Thank You

Gary DeBell

Gary DeBell
Kaufman Press Printing
P.O. Box 68
Syracuse, N.Y. 13207

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MUR 2606

plm



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 13, 1989

Mr. Gary DeDell
Kaufman Press Printing
P.O. Box 68
Syracuse, N.Y. 13207

RE: MUR 2606

Dear Mr. DeDell:

This is in response to your letter dated January 9, 1989 in which you inquired about the determination in the above-referenced matter.

Our legal analysis is stated in the attached First General Counsel's Report. This report was originally sent to you as an enclosure to our letter dated July 29, 1988 which notified you of the Commission's determination in this matter. By way of background, the Federal Election Commission is responsible for enforcing the Federal Election Campaign Act of 1971, as amended (the "Act"). The Act imposes reporting requirements on political committees which have outstanding debts. The Act requires a political committee to disclose the amount and nature of outstanding debts owed by the committee, and requires continuous reporting of debts until such debts are extinguished. Other issues arising from disputed debts, such as whether a party has an obligation to pay a disputed debt, are not governed by the Act and do not fall under the enforcement powers of the Commission.

Applying these rules to this matter, this Office concluded that the disputed debt between Citizens for the Republic and you, is not an obligation subject to the reporting requirements of the Act. We then recommended that the Commission find no reason to believe that Citizens for the Republic violated the Act. Our legal analysis is set forth in the attached report.

Sincerely,

Lois G. Lerner
Associate General Counsel

Enclosure
First General Counsel's Report

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