



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2808

DATE FILMED 4/17/90 CAMERA NO. 1

CAMERAMAN AS

00040774774

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 21 October 1988

ANALYST: Anthony Raymond

I. COMMITTEE: Democratic State Central Committee
(C00161786)
Christopher T. Gates, Treasurer
P.O. Box 300338
Denver, CO 80203

II. RELEVANT STATUTE: 2 U.S.C. §434(b)(3)(A)
and (b)(5)(A)
11 CFR 104.3(a)(4) and (b)(3)
11 CFR 102.5(a)(1)

III. BACKGROUND:

Failure to Provide Schedules and Possible Receipt of Impermissible Funds

The Democratic State Central Committee ("the Committee") of Colorado failed to disclose gross receipts and disbursements on its 1988 April Quarterly Report. Instead, the Committee disclosed summaries of activity conducted through a custodial account controlled by Gordon and Schwenkmeyer, Inc., the Committee's telemarketing agent (Attachment 2).

A Request for Additional Information ("RFAI") was sent to the Committee on May 25, 1988. The RFAI noted the custodial arrangement with the telemarketing firm and that net receipts reported by the Committee was not sufficient disclosure. The RFAI stated that gross receipts and disbursements must be reported by the Committee to accurately disclose activity of the federal account (Attachment 3).

On June 3, 1988, the Reports Analysis Division ("RAD") analyst returned a call from Sigrid H. Freese, the Committee's Executive Director. The RAD analyst asked about the Committee's relationship with Gordon and Schwenkmeyer, Inc. and the custodial account. Ms. Freese stated that the account was a federal account controlled by the

900407/4775

DEMOCRATIC STATE CENTRAL COMMITTEE
(OF COLORADO)
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

telemarketing firm, and deposits from it were made to the Committee's other federal account. The RAD analyst told the Executive Director that a written explanation about the account was needed and that all previous activity by the account needed to be disclosed in amendments (Attachment 4).

On June 16, 1988, a Second Notice was sent to the Committee for failure to respond in writing to the RFAI (Attachment 5).

On June 16, 1988, the Committee filed an amended 1988 April Quarterly Report in the form of a letter. Ms. Freese stated that Gordon & Schwenkmeyer has conducted telemarketing for the Committee since April of 1986. The letter went on to state:

All pledges are received in a "lock box" and deposited by Gordon & Schwenkmeyer into our custodial account which they control. Once a month we receive an accounting which shows expenses incurred, calls made and a total figure for number and dollar amount of pledges received in the previous month. Approximately once a month, the Colorado Democratic Party receives a check from our custodial account representing our share of the pledges received after expenses have been taken out and a reasonable sum has been left in the account to cover potential expenses.

When the State Party receives these checks, they are deposited either in our non-federal operating account, or into our federal account, depending on our perceived needs for federal funds in the near future. Thus in 1986 we made several deposits from Gordon & Schwenkmeyer to our federal account. This caused some confusion until we clarified that these checks did not represent corporate contributions, and enclosed more documentation of the expenses incurred and the number of pledges and gross amount of pledges received into the custodial account.

In addition, Ms. Freese stated that it was not possible to supply further contributor information for funds received during January 1 through April 30, 1988 (Attachment 6).

On July 13, 1988, the RAD analyst sent an RFAI for the 1988 Amended April Quarterly Report. The RFAI asked the treasurer to clarify the role of the custodial account with respect to 11 CFR 102.5(a)(1)(i) and (ii). The RFAI also

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DEMOCRATIC STATE CENTRAL COMMITTEE
(OF COLORADO)
REPORTS ANALYSIS OGC REFERRAL
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stated that the Commission could take further legal action, however, the Committee's prompt action in correcting the Public Record and its bookkeeping/record-keeping system would be taken into account (Attachment 7). On August 4, 1988, the Committee was sent a Second Notice for failure to respond to the RFAI (Attachment 8).

On September 12, 1988, the RAD analyst telephoned Ms. Freese about the needed amendments. Ms. Freese stated that she would send something in soon (Attachment 9).

As of this date, the Committee has failed to respond. However, the Committee's October Quarterly Report discloses \$107,920.74 in individual contributions (of which \$17,500 is itemized on Schedule A), no receipts from Gordon & Schwenkmeyer, and a \$39,864.74 payment to Gordon & Schwenkmeyer for "telemarketing" with the date noted "7/1/88 thru (sic) 9/30/88" (Attachment 10).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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FEDERAL ELECTION COMMISSION
1987-1988
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

Attachment 1

DATE 18OCT88

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF	MICROFILM
					PAGES	LOCATION
					TYPE OF FILER	
DEMOCRATIC STATE CENTRAL COMMITTEE				ID #C00161786 PARTY NON-QUALIFIED		
CONNECTED ORGANIZATION: EL PASO COUNTY DEMOCRATIC CLUB						
	1987 STATEMENT OF ORGANIZATION - AMENDMENT			18JUN87	2	87FEC/469/5438
	APRIL QUARTERLY	24	4,000	1JAN87 -31MAR87	4	87FEC/465/2294
	APRIL QUARTERLY - AMENDMENT	24	4,000	1JAN87 -31MAR87	3	87FEC/473/4099
	JULY QUARTERLY	4,277	5,353	1APR87 -30JUN87	7	87FEC/473/4092
	OCTOBER QUARTERLY	1,024	2,871	1JUL87 -30SEP87	6	87FEC/492/4371
	YEAR-END	6,507	6,295	1OCT87 -31DEC87	6	88FEC/498/1278
	YEAR-END - AMENDMENT	-	-	1OCT87 -31DEC87	4	88FEC/509/3206
	1'ST LETTER INFORMATIONAL NOTICE			1OCT87 -31DEC87	3	88FEC/503/2685
1988	APRIL QUARTERLY	10,055	9,770	1JAN88 -30APR88	16	88FEC/523/3007
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN88 -30APR88	4	88FEC/529/3229
	REQUEST FOR ADDITIONAL INFORMATION			1JAN88 -31MAR88	3	88FEC/533/5351
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN88 -31MAR88	4	88FEC/541/0270
	REQUEST FOR ADDITIONAL INFORMATION			1JAN88 -30APR88	1	88FEC/528/0344
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN88 -30APR88	2	88FEC/529/3206
	JULY QUARTERLY	6	301	1APR88 -30JUN88	5	88FEC/532/4838
	OCTOBER QUARTERLY	132,511	82,422	1JUL88 -30SEP88	18	88FEC/551/5021
	TOTAL	154,404	0 111,012 0		88	TOTAL PAGES

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All reports have been reviewed except the October Quarterly.

Debts and obligations owed to the Committee as of 9/30/88: \$-0-

Debts and obligations owed by the Committee as of 9/30/88: \$45,771.86

Cash-on-hand as of 9/30/88: \$ 50,362.01

APR 25 1988

00161706 000706
 CHRISTOPHER Y GATES
 DEMOCRATIC STATE CENTRAL COMMITTEE
 P.O. BOX 300330
 DENVER CO 80203

This committee qualified as a political committee under the Reporting Period

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)
 - Termination Report
- Monthly Report Due On:
- February 28
 - March 31
 - April 30
 - May 31
 - June 30
 - July 31
 - August 31
 - September 30
 - October 31
 - November 30
 - December 31
 - January 31
- Month-day report preceding _____ (Type of Election)
 election on _____ in the State of _____
- Month-day report following the General Election on _____ in the State of _____
- (a) Is this Report an Amendment? YES NO

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>Jan 1, 1988</u> through <u>April 30, 1988</u>		
6. (a) Cash on hand January 1, 19 <u>88</u>		\$ 283.00
(b) Cash on Hand at Beginning of Reporting Period	\$ 283.00	
(c) Total Receipts (from Line 18)	\$ 10,055.38	\$ 10,055.38
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 10,338.38	\$ 10,338.38
7. Total Disbursements (from Line 28)	\$ 9,770.30	\$ 9,770.30
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 568.08	\$ 568.08
9. Debts and Obligations Owed TO the Committee (Reverse all on Schedule C and/or Schedule D)	\$	
10. Debts and Obligations Owed BY the Committee (Reverse all on Schedule C and/or Schedule D)	\$ 46,771.86	

For further information contact:
 Federal Election Commission
 999 E Street, N.W.
 Washington, DC 20540
 Toll Free 800-424-9529
 Local 202-574-6520

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
Christopher C. Gates
 Signature of Treasurer
Christopher C. Gates 4/21/88

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of U.S.C. 5307.

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DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 310)

Name of Committee (in full)	Report Covering the Period	
Democratic State Central Committee	From: Jan 1, 1988	To: April 30, 1988
	COLUMN A	COLUMN B
	Total This Period	Calendar Year-To-Date
I. RECEIPTS		
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees:		
(i) Itemized (use Schedule A):	10,000.00	10,000.00
(ii) Unitemized:		
(iii) Total of contributions from individuals:		
(b) Political Party Committees:		
(c) Other Political Committees (such as PACs):		
(d) TOTAL CONTRIBUTIONS (add 11(a)(i), (b), and (c)):	10,000.00	10,000.00
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES:		
13. ALL LOANS RECEIVED:		
14. LOAN REPAYMENTS RECEIVED:		
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.):		
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES:		
17. OTHER RECEIPTS (Dividends, Interest, etc.) 55.38:		
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17):	10,055.38	10,055.38
II. DISBURSEMENTS		
19. OPERATING EXPENDITURES:	289.84	289.84
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES:		
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES:		
22. INDEPENDENT EXPENDITURES (use Schedule E):		
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F):		
24. LOAN REPAYMENTS MADE:	9,468.46	9,468.46
25. LOANS MADE:		
26. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees:		
(b) Political Party Committees:		
(c) Other Political Committees (such as PACs):		
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c)):		
27. OTHER DISBURSEMENTS 12.00:	12.00	12.00
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27):	9,770.30	9,770.30
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d)):	10,000.00	10,000.00
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d)):	-0-	-0-
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29):	10,000.00	10,000.00
32. TOTAL OPERATING EXPENDITURES (from Line 19):	289.84	289.84
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15):	-0-	-0-
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32):	289.84	289.84

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedules for each category of the Detailed Summary Page

PAGE 01 OF 1
FOR LINE NUMBER

11a

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 contributors.

NAME OF COMMITTEE (In Full)

Democratic State Central Committee

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Gordon and Schwenkmeier 5751 Uplander Way Culver City, CA 90230	* See attached explanation	2/9/88	10,000.00
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date > \$10,000.00		
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date > \$		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date > \$		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date > \$		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date > \$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date > \$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date > \$		
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page the line number only)			10,000.00

DEMOCRATS

Colorado Democratic Party

• Schedule A "Itemized Receipts"

Explanation of receipt from Gordon and Schwenkmeier

1. Monthly Expense summary from Gordon and Schwenkmeier
2. Return Summaries from Gordon and Schwenkmeier
3. Explanation of custodial account at Gordon and Schwenkmeier

3 8 1 0 5 2 3 0 1 0

Colorado Democratic Party
1601 Downing Street, 11th Floor
Denver, Colorado 80202
303-733-8000

Colorado Democratic Party
1601 Downing Street, 11th Floor
Denver, Colorado 80202
303-733-8000

**GORDON and
SCHWENKMEYER**

COLORADO DEMOCRATIC PARTY NOVEMBER EXPENSE SUMMARY

GORDON AND SCHWENKMEYER FEES	2,991 attempts at .55¢ per attempt.	1,645.05
	4,006 attempts at .37¢ per attempt.	1,482.22
PHONE CHARGES	7,446 minutes at .20¢ per minute.	1,489.20
PRINTING	First billing - 1,707	256.05
	Second billing - 738	110.70
POSTAGE	First billing - 1,707	375.54
	Second billing - 738	162.36
COMPUTER LABOR	5.91 hours at \$75 per hour.	443.57
DATA ENTRY	4 hours at \$12 per hour.	48.00
COMPUTER PAPER	637 pages at .05¢ per page.	31.85
MISCELLANEOUS	Shipments.	69.45
TOTAL MONTHLY EXPENSES		\$6,113.99

**GORDON
SCHWENKMEYER**

COLORADO DEMOCRATIC PARTY NOVEMBER RETURNS SUMMARY

<u>DATE</u>	<u>RETURNS</u>	<u>DOLLARS RETURNED</u>	<u>AV. RETURN</u>
11/5	168	2,788.00	16.59
11/20	186	2,856.00	15.35

9 0 0 3 5 2 3 3 0 1 2

GORDON and SCHWENKMEYER

COLORADO DEMOCRATIC PARTY DECEMBER EXPENSE SUMMARY

GORDON AND SCHWENKMEYER FEES	4,421 attempts at .55¢ per attempt.	2,431.55
	9,734 attempts at .37¢ per attempt.	3,601.58
PHONE CHARGES	9,004 minutes at .20¢ per minute.	1,800.80
PRINTING	First billing - 2,160	324.00
3	Second billing - 1,298	194.70
1	Third billing - 576	86.40
POSTAGE	First billing - 2,160	475.20
3	Second billing - 1,298	285.56
3	Third billing - 576	126.72
COMPUTER		685.59
DATA ENTRY	12.5 hours at \$12 per hour.	150.00
COMPUTER PAPER	425 pages at .05¢ per page.	21.25
MISCELLANEOUS	Shipments.	88.60
TOTAL MONTHLY EXPENSES		\$10,271.95

SCHWENKMEYER

COLORADO DEMOCRATIC PARTY DECEMBER RETURN SUMMARY

<u>DATE</u>	<u>RETURNS</u>	<u>DOLLARS RETURNED</u>	<u>AV. RETURN</u>
12/3	142	2,549.00	17.95
12/17	792	13,236.00	16.71
12/29	653	11,125.00	17.03

1 9 9 2 5 0 1 4

GORDON & SCHWENKMEYER

COLORADO DEMOCRATIC PARTY JANUARY 1988 MONTHLY EXPENSE SUMMARY

PRINTING	2nd billing - 695	104.25
	3rd billing - 320	48.00
POSTAGE	2nd billing - 695	152.90
	Thrid billing - 320	70.40
COMPUTER		16.63
MISCELLANEOUS	Shipments.	120.25
	TOTAL MONTHLY EXPENSES:	\$512.43

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GORDON
SCHWENKMEYER

COLORADO DEMOCRATIC PARTY JANUARY 1988 RETURN SUMMARY

<u>DATE</u>	<u>RETURNS</u>	<u>DOLLARS RETURNED</u>	<u>AV. RETURN</u>
1/13	716	12,588.80	17.58
1/27	284	4,530.00	15.95

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of all solicitations comply with applicable State and Federal laws;

(d) Take all steps necessary to qualify GSI to do business in any state where funds are solicited;

(e) Verify the accuracy of all phone numbers and addresses for all persons on the lists prepared by GSI;

(f) Secure bids and commitments for union commercial printing and services necessary to complete the billing process at the lowest possible cost;

(g) Arrange for telephone service for the phone bank at the lowest possible cost;

(h) Hire, train and supervise phone bank supervisors, phone solicitors and necessary clerical support for fundraising activities;

(i) Supervise telephone fundraising activities on a daily basis;

(j) Make a reasonable effort to contact all persons from lists that are prepared;

(k) Provide CDP with information generated by GSI in its role as an agent of CDP for the purpose of preparing necessary financial and/or political/campaign reports;

(l) Assist CDP with preparing the necessary financial and/or political/campaign reports, as may reasonably be requested by CDP;

(m) Open a custodial checking account into which all donations received through the telephone solicitation program shall be deposited. GSI shall serve as custodian of such

account;

(n) Pay from GSI funds the following expenses of the program;

(1) Costs of insurance, accountants and other professional services, including insurance sufficient to cover any loss of CDP's records.

(2) Salaries and expenses for all employees necessary for preparing reports and mailing out pledge statements for the first billing. If additional billings are decided upon, the fee will be negotiated at that time.

(3) Salary and expenses of phone bank coordinators to supervise the daily activities of the fundraising efforts.

(4) All costs of advertising for, and hiring of phone solicitors and other necessary employees.

(5) Costs of training sessions for supervisors and phone solicitors.

(6) Costs of supervising the mailing, printing, and preparation of all printed materials.

(7) Costs of supervising the collection and transfer to GSI headquarters of contributions to the program.

(8) Costs of setting up the phone bank.

(9) Costs of operating the GSI headquarters.

(10) Any other costs necessary for GSI to carry out its responsibilities under this Agreement;

(o) Prepare a financial statement every 30 days.

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1
FOR LINE NUMBER 28

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Democratic State Central Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A.B. Hirschfeld Press 5200 Smith Road Denver, CO 80216	Repay debt Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	2/10/88	2,000.00
Ridder/Braden Union Station #210 Denver, CO 80202	Repay debt Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	2/10/88	2,522.17
Harte/Hanks 400 Quivas Denver, CO 80217	Repay debt Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	2/10/88	946.29
Colo Demo Party Operating Account P.O. Box 300338 Denver, CO 80203	Repay debt Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	2/10/88	4,000.00
Colo Demo Party Operating Act P.O. Box 300338 Denver, CO 80203	Administrative Expense Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3/30/88	289.84

SUBTOTAL of Disbursements This Page (optional)	
TOTAL This Period (all page this line number only)	9,758.30

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 1 of 1 for
LINE NUMBER _____
(Use separate schedules
for each numbered line)

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payments This Period	Outstanding Balance at Close of This Period
Democratic State Central Committee				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor A.B. Hirschfeld Press 5200 Smith Road Denver, CO 80216	8,135.86	-0-	2,000.00	6,135.86
Nature of Debt (Purpose): Print flyers "Volunteer activity"				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Ridder/Braden Union Station #210 Denver, CO 80202	2,522.17	-0-	2,522.17	-0-
Nature of Debt (Purpose): 15% Fed share consultant services				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Harte/Hanks 400 Quivas Denver, CO 80217	946.29	-0-	946.29	-0-
Nature of Debt (Purpose): 15% Fed share mailing services				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Colo Demo Party P.O. Box 300338 Denver, CO 80203	44,636.00	-0-	4,000.00	40,636.00
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				46,771.86
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20461

RG-2

MAY 25 1986

Christopher T. Gates, Treasurer
Democratic State Central Committee
P.O. Box 300338
Denver, CO 80203

Identification Number: C00161786

Reference: April Quarterly Report (1/1/86-4/30/86)

Dear Mr. Gates:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report discloses a custodial arrangement with Gordon and Schwenkmyer, Inc. Commission Regulations require all political committees to establish either one account used to influence both Federal and non-Federal elections, or two accounts - one solely for influencing Federal elections, the other for non-Federal elections. (11 CFR 102.5) Use of a custodial agent is permitted, however, all permissible gross receipts must be deposited into your Federal account and reported accordingly on your filings to the Commission. Administrative costs, including allocable payments to your custodial agent, must be paid from said account either to the agent or to your non-Federal account, and must be reported on Schedule B of your filings. Net receipts from individuals which are reported do not accurately disclose contributions (i.e., the gross amount received) from those individuals. Please amend your report to accurately disclose the activity of your Federal account.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

A handwritten signature in cursive script that reads "Anthony Raymond".

Anthony Raymond
Senior Reports Analyst
Reports Analysis Division

ANALYST: Tony Raymond

CONVERSATION WITH: Sigrid Freese, Executive Director

COMMITTEE: Democratic State Central Committee -- Colorado

DATE: June 3, 1988

SUBJECT(S): Request For Additional Information

I returned Ms. Freese's call. Ms. Freese expressed her displeasure about this inquiry because she thought that the matter had been thoroughly reviewed in the previous election cycle. I asked Ms. Freese about the Committee's relationship with Gordon and Schwenkmeyer, Inc. and the custodial account. Ms. Freese stated that the account was a federal account controlled by the telemarketing firm and that deposits from it were made to the Committee's other federal account. I instructed Ms. Freese to put this explanation in writing and that all activity by all federal accounts needed to be reported. Ms. Freese stated that she would put something together.

900407/4794



FEDERAL ELECTION COMMISSION

RQ-3

WASHINGTON DC 20461

June 16, 1988

Christopher T. Gates, Treasurer
Democratic State Central Committee
P.O. Box 300338
Denver, CO 80203

Identification Number: C00161786

Reference: April Quarterly Report (1/1/88-4/30/88)

Dear Mr. Gates:

This letter is to inform you that as of June 15, 1988, the Commission has not received your response to our request for additional information, dated May 25, 1988. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this letter, please contact Anthony Raymond on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

A handwritten signature in cursive script that reads "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

COLORADO
DEMOCRATS

Colorado Democratic Party

September 23, 1986

Michael Butterfield, Reports Analyst
Report Analysis Division
FEC
Washington, DC 20463

Dear Michael:

ID #C00161786

Reference: July Quarterly (4/1/86 - 6/30/86) and 12 Day Pre-Primary (7/1/86 - 7/23/86) Report.

As per your telephone conversation today with Janet Landry, I am enclosing documentation from Gordon and Schwenkmeyer pertaining to the custodial checking account into which donations received through their telephone solicitation program are deposited for the Colorado Democratic Party.

I understand that this will resolve the Gordon and Schwenkmeyer problem.

Thank you.

Sincerely, yours,

Christopher T. Gates
Treasurer

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11 CFR 102.5(a)(1) states, in part:

(1) Each organization, including a party committee, which finances political activity in connection with both federal and non-federal elections and which qualifies as a political committee under 11 CFR 100.5 shall either:

(i) Establish a separate federal account in a depository in accordance with 11 CFR Part 103. Such account shall be treated as a separate federal political committee which shall comply with the requirements of the Act including the registration and reporting requirements of 11 CFR Parts 102 and 104. Only funds subject to the prohibitions and limitations of the Act shall be deposited in such separate federal account. All disbursements, contributions, expenditures and transfers by the committee in connection with any federal election shall be made from its federal account. No transfers may be made to such federal account from any other account(s) maintained by such organization for the purpose of financing activity in connection with non-federal elections. Administrative expenses shall be allocated pursuant to 11 CFR Part 106 between such federal account and any other account maintained by such committee for the purpose of financing activity in connection with non-federal elections; or

(ii) Establish a political committee which shall receive only contributions subject to the prohibitions and limitations of the Act, regardless of whether such contributions are for use in connection with federal or non-federal elections. Such organization shall register as a political committee and comply with the requirements of the Act.

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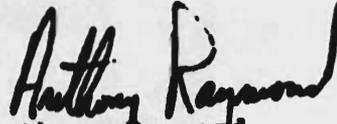
With respect to 11 CFR 102.5(a)(1)(i) and (ii), please clarify the role of your custodial account. Should the custodial account represent a separate federal account pursuant to 11 CFR 102.5(a)(1)(i), please be advised of the requirements of 11 CFR Parts 102, 103, 104 and 106. Reports of Receipts and Disbursements for calendar years 1986, 1987 and 1988, as well as your Statement of Organization must be amended. Should the custodial account represent an account established pursuant to 11 CFR 102.5(a)(1)(ii), please be advised of the requirements of 11 CFR Parts 102, 103, 104 and 106 for all accounts mentioned in your letter.

The Commission may take further legal action concerning this matter; however, your prompt action in correcting the Public Record and your bookkeeping/record-keeping system will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the

date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,



Anthony Raymond
Senior Reports Analyst
Reports Analysis Division

1375505350



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

August 4, 1988

89-3

Christopher T. Gates, Treasurer
Democratic State Central Committee
P.O. Box 300338
Denver, CO 80203

Identification Number: C00161786

Reference: Amended April Quarterly Report (1/1/88-3/31/88 -dated
6/12/88)

Dear Mr. Gates:

This letter is to inform you that as of August 3, 1988, the Commission has not received your response to our request for additional information, dated July 13, 1988. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Anthony Raymond on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

John D. Gibson
John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

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ANALYST: Tony Raymond

CONVERSATION WITH: Sigrid Freese, Executive Director

COMMITTEE: Democratic State Central Committee -- Colorado

DATE: September 12, 1988

SUBJECT(S): Request For Additional Information

I called Ms. Freese about RFAs sent on July 13, 1988. Ms. Freese stated that she had been very busy but would get something in to the FEC by the end of the week.

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DETAILED SUMMARY PAGE

of Receipts and Disbursements
(Page 2, FEC FORM 310)

Name of Committee (in full)	Report Covering the Period	
Democratic State Central Committee	From 7/1/88	To 9/30/88
I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
11 CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A)	17,500.00	27,500.00
(ii) Unitemized	90,420.74	90,420.74
(iii) Total of contributions from individuals	107,920.74	117,920.74
(b) Political Party Committees	9,467.61	9,467.61
(c) Other Political Committees (such as PACs)	15,000.00	15,000.00
(d) TOTAL CONTRIBUTIONS (add 11(a)(i), (b), and (c))	132,388.35	142,388.35
12 TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-
13 ALL LOANS RECEIVED	-0-	-0-
14 LOAN REPAYMENTS RECEIVED	-0-	-0-
15 OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	-0-	-0-
16 REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-
17 OTHER RECEIPTS (Dividends, Interest, etc.) Interest	123.58	185.70
18 TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	132,511.93	142,574.05
II. DISBURSEMENTS		
19 OPERATING EXPENDITURES	80,591.20	90,639.34
20 TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-
21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-
22 INDEPENDENT EXPENDITURES (use Schedule E)	-0-	-0-
23 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)	-0-	-0-
24 LOAN REPAYMENTS MADE	-0-	-0-
25 LOANS MADE	-0-	-0-
26 REFUNDS OF CONTRIBUTIONS TO		
a. Individuals/Persons Other Than Political Committees	-0-	-0-
b. Political Party Committees	-0-	-0-
c. Other Political Committees (such as PACs)	-0-	-0-
d. TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))	-0-	-0-
27 OTHER DISBURSEMENTS	1,831.70	1,855.70
28 TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d), and 27)	82,422.90	92,495.04
III. NET CONTRIBUTIONS OPERATING EXPENDITURES		
29 TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))	132,388.35	142,388.35
30 TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	-0-	-0-
31 NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)	132,388.35	142,388.35
32 TOTAL OPERATING EXPENDITURES (from Line 19)	80,591.20	90,639.34
33 OFFSETS TO OPERATING EXPENDITURES (from Line 15)	-0-	-0-
34 NET OPERATING EXPENDITURES (subtract Line 33 from 32)	80,591.20	90,639.34

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SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes other than using the name and address of any political committee to solicit contributions from such or committee.

NAME OF COMMITTEE (in Full)

Democratic State Central Committee

CD-161786

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Esquire Nochemo 50 Park St Dorchester MA 02122	40% Donkey ties Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9/29/88	216.68
Julie Bell 1638 Humboldt Denver, CO 80218	64 staff hours Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9/30/88	275.45
Doug Schroeder 301 E Malley #62 Northglenn, CO 80233	56 staff hours Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9/30/88	215.83
Gordon and Schwenkmeier 550 N Continental #180 El Segundo, CA 90245	Expense of telemarketing Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	7/1/88 thru 9/30/88	39,864.74
A.B. Hirschfeld Pres. 5200 Smith Road Denver, CO 80216	Repay Debt Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) 1986 election	9/16/88	1,000.00

SUBTOTAL	41,572.77
TOTAL	80,591.00

RECEIVED
FEDERAL ELECTION COMMISSION
SECRET

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD Referral: 88L-26
STAFF MEMBER: Frania
Monarski

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

RESPONDENTS: Democratic State Central
Committee (of Colorado) and
Christopher T. Gates, as treasurer

Gordon & Schwenkmeyer, Inc.

RELEVANT STATUTES: 2 U.S.C. § 432
2 U.S.C. § 434
11 C.F.R. § 102.8(b)
11 C.F.R. Part 103

INTERNAL REPORTS CHECKED: Disclosure Indexes

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF THE MATTER

The Reports Analysis Division ("RAD") referred the Democratic State Central Committee (of Colorado) (the "Committee") and Christopher T. Gates, as treasurer, to the Office of General Counsel for violations of the reporting and recordkeeping requirements of the Federal Election Campaign Act of 1971, as amended (the "Act"). See generally 2 U.S.C. §§ 432 and 434.

II. FACTUAL AND LEGAL ANALYSIS

According to the RAD Referral material, the Committee received funds during 1988 from a so-called "custodial account" controlled by Gordon & Schwenkmeyer, Inc., its telemarketing and fundraising agent. Gordon & Schwenkmeyer maintained only one custodial account on behalf of the Committee and transferred the

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funds in a lump sum to the Committee. The Committee only disclosed summaries of the activity conducted through the custodial account and failed to report and itemize gross receipts and disbursements from this account in its 1988 April Quarterly Report. On June 16, 1988, the Committee filed an amended April Quarterly Report to explain the custodial account. The Committee reported that all pledges are received into a "lock box" and deposited by Gordon & Schwenkmeyer into the custodial account. Once a month, the Committee receives an accounting of the funds which includes the expenses incurred, the calls made and the total number and dollar amount of the pledges. The Committee also receives a check representing its share of the pledges after expenses and deposits this check into either its non-federal operating account or its federal account depending on its "perceived needs for federal funds" in the future.

The Act requires each political committee to designate one or more state banks, federally chartered depository institutions or insured depository institutions as its campaign depository. 2 U.S.C. § 432(h). Commission Regulations explain that the committee must notify the Commission of all designated depositories. 11 C.F.R. § 103.1. The committee must deposit all contributions into the depository within ten days of receipt. 11 C.F.R. § 103.3(a). Moreover, no disbursements may be made by the committee except by check drawn from the campaign depository. 2 U.S.C. § 432(h). The Commission has also determined that expenditures made by an agent of the committee

must be drawn from a bank account in a depository institution designated by the committee. Advisory Opinion 1980-42.

The Act further requires a committee or its agent to comply with certain reporting and recordkeeping requirements under the Act when it accepts contributions. See generally 2 U.S.C. §§ 432 and 434. Any person who receives a contribution of \$50 or less on behalf of a committee which is not an authorized committee must forward that contribution to the treasurer no later than thirty days after receiving the contribution. 2 U.S.C. § 432(b)(2)(A). If the contribution is more than \$50, the agent must forward the name and address of the contributor, the contribution and the date of the receipt of the contribution, no later than ten days after receiving the contribution. 2 U.S.C. § 432(b)(2)(B). Finally, if the amount of the contribution exceeds \$200, the agent must forward the contribution, the identification of the contributor, including his or her name, address, occupation and name of his or her employer, and the date of receipt of the contribution. 11 C.F.R. § 102.8(b)(2). The date of receipt refers to the date that the agent obtains possession of the contribution. Id. The Commission has also determined that the forwarding and depositing requirements outlined above are met when a fundraising agent, acting on behalf of the committee, deposits contributions in an account maintained by the agent that is a campaign depository. The agent, however, must still fulfill the recordkeeping duties required by the Act and Commission Regulations. Advisory Opinion 1980-42.

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A treasurer or his or her authorized agent must comply with certain recordkeeping requirements pursuant to the Act.

2 U.S.C. § 432(c). For a contribution in excess of \$50, a treasurer must keep an account of the name and address of the contributor, the date and the amount of the contribution.

2 U.S.C. § 432(c)(2). If a person makes contributions aggregating more than \$200 during a calendar year, the treasurer must record the identification of the person, the date and the amount of the contribution. 2 U.S.C. § 432(c)(3). Moreover,

the treasurer must keep a record on any disbursement made including the name and address of the person to whom the disbursement is made, the date, the amount and the purpose of the disbursement, and the name of the candidate and the office sought by the candidate, if any, for whom the disbursement is made, including a receipt, invoice or canceled check for each disbursement over \$200. 2 U.S.C. § 432(c)(5). The Act further requires the treasurer to preserve all records and copies of the reports for three years after the reports are filed. 2 U.S.C. § 432(d).

Pursuant to the Act, a treasurer of a political party must file quarterly reports indicating receipts and disbursements made during that period. 2 U.S.C. § 434. The report must contain the total amounts of all receipts from contributions made by individuals, authorized committees and political party committees. 2 U.S.C. § 434(b)(2). Moreover, the report must indicate the identification of a person who makes a contribution in excess of \$200 or in any lesser amount if the committee

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chooses, together with the date and amount of the contribution. 2 U.S.C. § 434(b)(3)(A). The treasurer must report all the disbursements made by the committee during the reporting period. 2 U.S.C. § 434(b)(4). The report must contain the name and address of each person to whom an expenditure in excess of \$200 within the calendar year is made to meet the committee's operating expenses, together with the date, amount and purpose of the operating expenditure. 2 U.S.C. § 434(b)(5).

The RAD Referral material indicates that the custodial account contained funds that Gordon & Schwenkmeyer transferred as a lump sum to the Committee. Moreover, Sigrid H. Freese, the Executive Director of the Committee, indicated in a letter to RAD, dated June 12, 1988, that the Committee received a check from Gordon & Schwenkmeyer representing its shares of the funds after the expenses had been taken out. Gordon & Schwenkmeyer, as agent of of the Committee, therefore, has been making disbursements from this custodial account to pay its telemarketing expenses. This Office has reviewed the Committee's filings from 1985 through 1988. The Committee has failed to designate the custodial account as a campaign depository. Pursuant to the Act and Commission Regulations, the Committee should have designated the custodial account as a campaign depository because Gordon & Schwenkmeyer has been making disbursements from the custodial account on behalf of the Committee. Such disbursements must be made from a campaign depository. 2 U.S.C. § 432(h); see Advisory Opinion 1980-42. Because the custodial account functioned as a campaign

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depository and should have been designated as such, Gordon & Schwenkmeyer was required to meet the ten day and thirty day rules of 2 U.S.C. § 432(b)(2) with respect to depositing contributions into this account. Further, because this account was part of a "lock box" arrangement, it appears that Gordon & Schwenkmeyer deposited the contributions into this account within these time frames. As noted below, however, it does not appear that Gordon & Schwenkmeyer met the recordkeeping requirements of 2 U.S.C. § 432(b)(2).

After the Committee received the funds, it then deposited the funds into its federal account or its non-federal operating account, as needed, without knowledge of the sources of such funds because Gordon & Schwenkmeyer did not provide the Committee with an itemization of gross receipts. Since the account should have been listed as a campaign depository, all funds deposited into the custodial account are thus subject to the contribution prohibitions and limitations under the Act. In the letter to RAD, Sigrid Freese indicated that the Committee made several deposits from Gordon & Schwenkmeyer into its federal account in 1986 which were questioned by RAD. The Committee explained, however, that these deposits did not represent corporate contributions but were in fact funds received from individual, small contributors and provided documentation to support its explanation. Therefore, there is no evidence at this time to indicate that the funds solicited by Gordon & Schwenkmeyer and deposited into the custodial account included contributions prohibited by the Act.

000407/4311

In its 1988 April Quarterly Report, the Committee failed to itemize contributions, totaling \$10,000, received through the Gordon & Schwenkmeyer solicitations. It appears, from the RAD Referral material, that this \$10,000 only represents net proceeds, rather than gross receipts. The Committee, therefore, only disclosed summaries of the activity in the custodial account and failed to report and itemize gross receipts and expenses. Sigrid H. Freese indicated in the letter to RAD that the Committee has not kept records of the individual contributors and further stated that it would be impossible to provide this information for the April Quarterly.

We note that the Committee disclosed \$107,920.74 in individual contributions (of which \$17,500 is itemized) and no receipts from Gordon & Schwenkmeyer in its 1988 October Quarterly Report. The Committee, however, did report a \$39,864.74 payment to Gordon & Schwenkmeyer for telemarketing services provided during the quarter. Therefore, it appears that the Committee may have begun to take steps to correct its reporting and recordkeeping deficiencies. At this time, however, further investigation into this matter is necessary to determine the extent of possible past violations and whether or not the Committee is now fully complying with the Act and Regulations.

Based on the foregoing analysis, the Office of General Counsel recommends that the Commission find reason to believe that the Democratic State Central Committee (of Colorado) and Christopher T. Gates, as treasurer, violated 2 U.S.C. §§ 432(c),

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(d) and (h) and § 434(b) and 11 C.F.R. § 103.1 by failing to designate the custodial account as a campaign depository and by failing to comply with the reporting and recordkeeping requirements of the Act. Furthermore, this Office recommends that the Commission find reason to believe that Gordon & Schwenkmeyer, Inc. violated 2 U.S.C. § 432(b)(2) and 11 C.F.R. § 102.8(b) by failing to provide the Committee with the name and address of the contributor and date of receipt for contributions in excess of \$50 and the identification of the contributor and date of receipt for contributions in excess of \$200.

III. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that the Democratic State Central Committee (of Colorado) and Christopher T. Gates, as treasurer, violated 2 U.S.C. §§ 432(c), (d) and (h) and § 434(b) and 11 C.F.R. § 103.1.
3. Find reason to believe that Gordon & Schwenkmeyer, Inc. violated 2 U.S.C. § 432(b)(2) and 11 C.F.R. § 102.8(b).
4. Approve the attached letters and Factual and Legal Analysis.
5. Approve the attached questions.

Lawrence M. Noble
General Counsel

1/13/89
Date _____

By: 
Lois G. Lerner
Associate General Counsel

Attachments

1. RAD Referral Materials
2. Proposed Letters (2), Factual and Legal Analysis (2), and Proposed Interrogatories (2)

000407/4813

5. Approve the questions, as recommended in the First General Counsel's report signed January 13, 1989.

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

Attest:

Jan 19, 1989
Date

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

Received in the Office of Commission Secretary: Fri., 1-13-89, 2:10
Circulated on 48 hour tally basis: Tues., 1-17-89, 11:00
Deadline for vote: Thurs., 1-19-89, 11:00

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 25, 1989

Christopher T. Gates, Treasurer
Democratic State Central Committee
P.O. Box 300338
Denver, CO 80203

RE: MUR 2808
Democratic State Central
Committee and Christopher T.
Gates, as treasurer

Dear Mr. Gates:

On January 19, 1989, the Federal Election Commission found that there is reason to believe the Democratic State Central Committee and you, as treasurer, violated 2 U.S.C. §§ 432(c), (d) and (h) and § 434(b), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") and 11 C.F.R. § 103.1 of Commission Regulations. 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 the Committee and you, as treasurer. 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 the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

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Christopher T. Gates
Page 2

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.

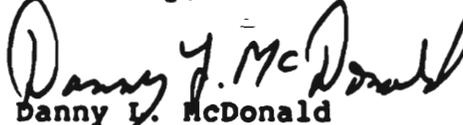
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 Franja Monarski, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,


Danny I. McDonald
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form
Questions

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 25, 1989

Gordon & Schwenkmeyer, Inc.
550 N. Continental #180
El Segundo, CA 90245

RE: MUR 2808
Gordon & Schwenkmeyer, Inc.

Dear Gentlemen:

On January 19, 1989, the Federal Election Commission found that there is reason to believe Gordon & Schwenkmeyer, Inc. violated 2 U.S.C. § 432(b)(2), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and 11 C.F.R. § 102.8(b) of the Commission Regulations. 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 Gordon & Schwenkmeyer, Inc. 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 Gordon & Schwenkmeyer, Inc., 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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Gordon & Schwenkmeyer, Inc.
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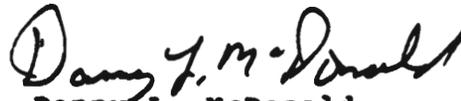
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 Frania Monarski, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,



Danny L. McDonald
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form
Questions

00040774319

06C1792

DAVIS, GRAHAM & STUBBS
ATTORNEYS AT LAW

WASHINGTON D.C. OFFICE
SUITE 500
1001 TWENTY-SECOND STREET, N.W.
WASHINGTON, D.C. 20037-1803
TELEPHONE 202-822-8660

SUITE 4700
370 SEVENTEENTH STREET
POST OFFICE BOX 185
DENVER, COLORADO 80201-0185

SALT LAKE CITY OFFICE
SUITE 1600-87
EAGLE GATE TOWER
60 EAST SOUTH TEMPLE
SALT LAKE CITY, UTAH 84111-1006
TELEPHONE 801-328-6000

TELEPHONE 303-892-9400
TELECOPIER 303-893-1379
TELEX 240451 DGS DVR
CABLE DAVGRAM, DENVER

ELIZABETH J. LENTINI
892-7465

HAND DELIVERED
89 FEB 10 AM 10:41

FEDERAL ELECTION COMMISSION
ADMINISTRATIVE SERVICES DIVISION

February 9, 1989

Frania Monarski
Federal Election Commission
Washington, D.C. 20463

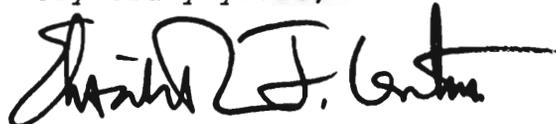
RE: MUR 2808

Dear Ms. Monarski:

On February 2, 1989, the Democratic State Central Committee of the State of Colorado (the "Committee") received a letter from Danny L. McDonald, Chairman of the Commission, regarding possible violations of the Federal Election Campaign Act of 1971 (MUR 2808). Enclosed is completed Statement of Designaton of Counsel for filing in connection with MUR 2808.

The Committee hereby requests an extension of two weeks (i.e., to March 6, 1989), to respond to the factual and legal analysis accompanying Mr. McDonald's letter. This extension is necessary to facilitate the gathering of documentation related to the MUR and because Sigrid Freese, the Committee's Executive Director and a crucial participant in the drafting of our response, will be out of the state during large portions of February.

Very truly yours,



Elizabeth J. Lentini

cc: Sigrid Freese

00040774370

89 FEB 10 AM 11:55

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2808

NAME OF COUNSEL: Elizabeth J. Lentini, Esq.

ADDRESS: 370 17th Street
Suite 4700
Denver, Colorado 80207

TELEPHONE: 303-892-7465

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

4/2/89
Date


Signature

RESPONDENT'S NAME: Christopher T. Gates

ADDRESS: Treasurer, Colo. Dem Party
1600 Downing, 6th floor
Denver, CO. 80218

HOME PHONE: 303-388-6457

BUSINESS PHONE: 303-830-8989

07740774821

rlm



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 14, 1989

Elizabeth J. Lentini
Davis, Graham & Stubbs
Suite 4700
370 Seventeenth Street
Post Office Box 185
Denver, CO 80201

RE: MUR 2808
Democratic State Central
Committee of Colorado and
Christopher T. Gates, as
treasurer

Dear Ms. Lentini:

This is in response to your letter dated February 9, 1989, which we received on February 10, 1989, requesting an extension until March 6, 1989 to respond to MUR 2808. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on March 6, 1989.

If you have any questions, please contact Frania Monarski, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

0004074822

GORDON and SCHWENKMEYER, INC.
TELEMARKETING

HAND DELIVERED
RECEIVED
FEDERAL ELECTION COMMISSION
ADMINISTRATIVE DIVISION

89 FEB 21 AM 10:06

550 N. Continental Blvd., Suite 180
El Segundo, CA 90245
TEL 213-615-2300
FAX 213-322-6005

OGC 1897
- MR 2808

February 14, 1989

Mr. Danny L. McDonald
Frania Monarski
Federal Elections Committee

Dear Mr. McDonald and Ms. Monarski:

This letter is in response to your letter dated January 25, 1989.

Gordon and Schwenkmeyer, Inc. is an outbound telemarketing firm which provides a variety of services including fundraising. Gordon and Schwenkmeyer, Inc. was retained by the Colorado Democratic Party to raise funds. The Colorado Democratic Party provided Gordon and Schwenkmeyer, Inc. with names of individuals to call for the purpose of soliciting donations. Gordon and Schwenkmeyer, Inc. called these individuals and requested contributions. Those who pledged were then mailed follow-up collection envelopes. Contributions were returned to a post office box in Colorado and mailed weekly to Gordon and Schwenkmeyer, Inc. All contributions are immediately recorded and deposited into a custodial account at the Bank of Beverly Hills, California. On a monthly basis, Gordon and Schwenkmeyer, Inc. provides the Colorado Democratic Party a report of all expenses incurred and all contributions received. Gordon and Schwenkmeyer, Inc. deducts its expenses from the custodial accounts and provides the net profit to the Colorado Democratic Party.

1a. Gordon and Schwenkmeyer, Inc. began fundraising for the Colorado Democratic Party in May of 1985.

1b. copies enclosed

1c. Gordon and Schwenkmeyer, Inc. enters all contribution information (name, address, contribution amount and date) on to a computer file. A monthly expense report is prepared outlining all fees and expenses. Enclosed are copies of monthly billings for the period in question.

1d. Chart enclosed

1e. \$25,960.00

1f. \$15,398.66

3020 Saturn Street, Suite 200
Brea, CA 92621
TEL 714-524-4500
FAX 714-524-1420

401 Roland Way, Suite 290
Oakland, CA 94621
TEL 415-836-2700
FAX 415-636-0650

9616 Miramar Ave., Suite 630
Bakersfield, CA 93327
TEL 805-389-5900
FAX 805-389-3363

09 FEB 21 PM 1:51

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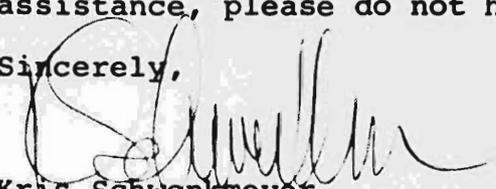
**GORDON and
SCHWENKMEYER INC.**
TELEMARKETING

1g. \$12,350.01 to Gordon and Schwenkmeyer, Inc.
\$16,500.00 to the Colorado Democratic Party

2. There were no corporate or labor union checks received or individual contributions in excess of \$5000.00.

Enclosed is additional information. If I can be of further assistance, please do not hesitate to contact me.

Sincerely,



Kris Schwenkmeyer

enclosures

0 0 0 4 3 7 4 8 2 4

AGREEMENT

This Agreement is made this 5th day of December, 1985, by and between the Colorado State Democratic Party, (hereinafter "CDP"), and Gordon & Schwenkmeyer, Inc., a California Corporation (hereinafter called "GSI").

1

W I T N E S S E T H:

WHEREAS, GSI has presented to CDP a proposal for providing services in raising funds through a phone solicitation program and CDP desires to utilize the services of GSI;

NOW THEREFORE, in consideration of the mutual promises contained herein, CDP and GSI hereby agree as follows:

ARTICLE 1. TERM OF AGREEMENT

Section 1.01. TERM. This Agreement shall be effective from June 1, 1985 through January 31, 1987, unless sooner terminated as provided in Article 6.

ARTICLE 2. OBLIGATIONS OF GSI

Section 2.01. RESPONSIBILITIES OF GSI. GSI shall:

- (a) Prepare lists of past contributors to the program, party activists and other party contributors from lists provided by CDP and compute the number of names thereon;
- (b) Prepare all materials to be used by telephone solicitors and for billing purposes. Such materials shall be subject to the approval of CDP;
- (c) Take the steps necessary to ensure that the content

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of all solicitations comply with applicable State and Federal laws;

(d) Take all steps necessary to qualify GSI to do business in any state where funds are solicited;

(e) Verify the accuracy of all phone numbers and addresses for all persons on the lists prepared by GSI;

(f) Secure bids and commitments for union commercial printing and services necessary to complete the billing process at the lowest possible cost;

(g) Arrange for telephone service for the phone bank at the lowest possible cost;

(h) Hire, train and supervise phone bank supervisors, phone solicitors and necessary clerical support for fundraising activities;

(i) Supervise telephone fundraising activities on a daily basis;

(j) Make a reasonable effort to contact all persons from lists that are prepared;

(k) Provide CDP with information generated by GSI in its role as an agent of CDP for the purpose of preparing necessary financial and/or political/campaign reports;

(l) Assist CDP with preparing the necessary financial and/or political/campaign reports, as may reasonably be requested by CDP;

(m) Open a custodial checking account into which all donations received through the telephone solicitation program shall be deposited. GSI shall serve as custodian of such

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account;

(n) Pay from GSI funds the following expenses of the program;;

(1) Costs of insurance, accountants and other professional services, including insurance sufficient to cover any loss of CDP's records.

(2) Salaries and expenses for all employees necessary for preparing reports and mailing out pledge statements for the first billing. If additional billings are decided upon, the fee will be negotiated at that time.

(3) Salary and expenses of phone bank coordinators to supervise the daily activities of the fundraising efforts.

(4) All costs of advertising for, and hiring of phone solicitors and other necessary employees.

(5) Costs of training sessions for supervisors and phone solicitors.

(6) Costs of supervising the mailing, printing, and preparation of all printed materials.

(7) Costs of supervising the collection and transfer to GSI headquarters of contributions to the program.

(8) Costs of setting up the phone bank.

(9) Costs of operating the GSI headquarters.

(10) Any other costs necessary for GSI to carry out its responsibilities under this Agreement;

(o) Prepare a financial statement every 30 days,

commencing January 31, 1985 which will state the gross income generated by the phone solicitation program, number of attempts, number of contacts, number of pledges, average pledge, total gross income, phone bill, printing bill, computer time bill, inputter fee, postage and net income, as well as fees owed to GSI, and costs incurred by GSI pursuant to Section 3.01. (c) of this Agreement, and provide such statements to CDP; and

(p) Render all other services, acts, or things reasonably necessary to carry out its responsibilities hereunder.

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Section 2.02. AMOUNT OF SERVICE. GSI agrees to devote the time necessary to complete performance of the responsibilities described herein. GSI shall consult with CDP on the timing of each cycle of calling, the frequency of calling cycles and the duration between start and finish of each cycle. All proven donor pledges will be billed up to three times. All prospective donors will be billed at least two times and possibly three times after discussion with CDP. GSI will attempt to contact all proven donors three times and prospective donors at least twice and possibly three times after consultation with CDP. Additionally GSI will conduct three full rounds of calling for CDP in 1985. GSI is not precluded hereunder from representing, or performing services for, and being employed by other persons or companies.

Section 2.03. METHOD OF PERFORMANCE. GSI will determine the method, details, and means of performing the

responsibilities, described herein after consultation with CDP. GSI will consult with CDP on a weekly basis on the progress of the program and the need to develop targeted program techniques.

Section 2.04. ADDITIONAL STAFF. GSI may, at GSI's expense, employ such assistants as GSI deems necessary to perform the services required of GSI by this agreement.

Section 2.05. INDEPENDENT CONTRACTOR. GSI shall perform the services under this Agreement as an independent contractor and shall not be treated as an employee of CDP for federal, state or local tax purposes or any other purposes.

Section 2.06. OWNERSHIP OF LISTS. Any list provided to or developed by GSI pursuant to this Agreement shall remain the property of CDP. GSI's use of such lists shall be restricted to the purposes of the program and under no circumstances shall GSI make such lists available to any party without the express written approval of CDP.

Section 2.07. CONFIDENTIALITY. GSI shall, with respect to all information received from and designated by CDP or its agents as confidential during and pursuant to this Agreement, comply with the following conditions:

(a) Hold such information in strict confidence and use same only in connection with the phone solicitation program;

(b) Segregate, avoid commingling of, and otherwise provide adequate physical security for all such confidential information and materials;

(c) Ensure that any person granted access to such

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confidential information is familiar with and complies with the terms of this Agreement as they relate to the duties of such person; and

(d) Upon demand of CDP or upon termination of this Agreement, whichever is earlier, GSI shall promptly return to CDP or upon CDP's request, destroy all such documents and other documents containing confidential information received hereunder, including copies in any form whatsoever, or other tangible evidence or impressions of such information, and shall thereafter make no further use thereof.

ARTICLE 3. OBLIGATIONS OF CDP.

Section 3.01. RESPONSIBILITIES OF CDP. CDP shall:

- (a) Cooperate to the greatest extent possible with GSI to ensure a successful phone solicitation program;
- (b) Provide GSI with lists of names of prior donors and potential donors, with their phone numbers and addresses if available; and
- (c) Pay all costs incurred by GSI for telephone service, printing and postage related to pledges made as a result of the phone solicitation program, for any computer time and staff support utilized in inputting information gained by GSI through the phone solicitation program and for any other expenses reasonably related to GSI's activities hereunder not specifically described in Section 2.01(n). Postage on all first billings will be \$.22. GSI will utilize the \$.04 reduced postage whenever the 5 digit zip code quantities apply. Billing sets are approximately

000407/4330

. \$10. Computer costs are \$75.00 per CPU hour and the data entry operator is \$12.00 per hour.

ARTICLE 4. COMPENSATION

Section 4.01. Fees. For its services performed pursuant to this Agreement, GSI shall receive fifty-four and a half cents (\$.545) for each phone call made to a prior donor to the program and shall receive thirty-two cents (\$.32) for each phone call made to a prospective donor. GSI shall be paid at the rate of \$6.00 an hour plus the applicable phone company charges for phone numbers obtained through directory assistance. GSI shall be paid at the rate of \$6.00 per hour for phone numbers obtained from a phone directory. For the purposes of this agreement, a phone call is considered a complete dial of the phone number followed by a sufficient period in which the phone might be reasonably answered. It shall be the responsibility of GSI to keep a record of each phone call made which includes the date called, the caller's name and number and the result of the call.

Section 4.02. TIME FOR PAYMENT. Upon preparation by GSI of a monthly financial statement provided for in Section 2.01 (o), and presentation to CDP, GSI is authorized to withdraw any accrued fees owed to GSI pursuant to Section 4.01(a) and costs incurred pursuant to Section 3.01(c) from the custodial checking account.

ARTICLE 5. TERMINATION

Section 5.01. TERMINATION BY CDP. CDP shall have the right to terminate this Agreement immediately if GSI is unwilling or unable to perform the services required by the terms of this Agreement in a timely fashion, or for cause constituting breach of this Agreement. Said termination shall be provided in writing. CDP shall pay GSI all fees earned and expenses incurred through the date of termination.

Section 5.02. TERMINATION BY EITHER PARTY. GSI or CDP shall have the right to terminate this Agreement for any reason on ninety (90) days written notice. GSI shall perform services and be paid its fees and expenses incurred until termination.

Section 5.03. MUTUAL TERMINATION. If GSI and CDP otherwise mutually agree to terminate this Agreement, CDP agrees that GSI shall be paid its fees and expenses incurred through the termination date.

ARTICLE 6. GENERAL PROVISIONS

Section 6.01. NOTICES. Any notices to be given hereunder by either party to the other may be effected either by personal delivery in writing or by mail, registered or certified, postage prepaid with return receipt requested. Mailed notices shall be addressed to the parties at the addresses appearing at the end of this agreement, but each party may change the address by written notice in accordance with this paragraph. Notices delivered personally will be deemed communicated as of actual receipt; mailed notices will be deemed communicated as of two (2) days after mailing.

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Section 6.02. PARTIAL INVALIDITY. If any provision in this agreement is held by a court of competent jurisdiction to be invalid, void, or unenforceable, the remaining provisions will nevertheless continue in full force without being impaired or invalidated in any way.

Section 6.03. ARBITRATION. Any controversy between the parties hereto involving the construction, interpretation, application, or enforcement of any part of this agreement will, on the written request of one party served on the other, be submitted to arbitration. The arbitration will comply with and be governed by the provisions of the California Arbitration Act, Sections 1280 through 1294.2 of the California Code of Civil Procedure, and as may be amended.

Any such arbitration shall be decided by an arbitrator agreeable to the parties, or otherwise selected in accordance with the California Arbitration Act. Such arbitration be held in California and shall be binding on the parties.

Section 6.04. ATTORNEYS' FEES. If any action at law or in equity, including an action for declaration relief or for arbitration, is brought to enforce or interpret the provisions of this agreement, the prevailing party will be entitled to reasonable attorneys' fees, which may be set by the court or arbitrator in the same action or in a separate action brought for that purpose, in addition to any other relief to which that party may be entitled.

Section 6.05. INDEMNIFICATION. GSI will not be liable to CDP, or to any other person or entity for any acts or omissions in the performance of services under the terms of this

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agreement or on the part of the employees or agents of GSI unless such acts or omissions are due to wilful misconduct. CDP will indemnify and hold GSI free and harmless from any obligations, costs, claims, judgments, attorneys' fees, and attachments arising from, growing out of or in any way connected with the services rendered to CDP under the terms of this agreement, unless GSI is judged by a court of competent jurisdiction to be guilty or wilful misconduct.

Section 6.06. GOVERNING LAW. This agreement will be governed by and contrued in accordance with the laws of the State of California.

Section 6.07. AUTHORIZATION TO SIGN. The parties hereby represent and warrant that the persons executing this Agreement are authorized to execute this Agreement and are authorized to obligate the respective parties to perform this Agreement.

Section 6.08. ENTIRE AGREEMENT. This agreement supersedes any and all agreements, either oral or written, between the parties hereto with respect to rendering of services by GSI for CDP and contains all of the covenants and agreements between the parties with respect to the rendering of such services in any manner whatsoever. Each party to this agreement acknowledges that no representations, inducements, promises, or agreements, orally or otherwise, have been made by any party, or anyone acting on behalf of any party, which are not embodied herein, and that no other agreement, statement, or promise not contained in this agreement shall be valid or binding. This

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Agreement may be signed in counterparts. Any modification of this agreement will be effective only if it is in writing signed by the party to be charged.

The parties hereto acknowledge that each has read the above document consisting of eleven (11) pages and agree to its terms and conditions.

Gordon & Schwenkmeyer, Inc.

Colorado State Democratic Party

By: Michael P. Gordon
Title: President

By: M. B. Seefeld
Title: Chair

Address: 5151 Lyndon Way
Lakewood, Co. 9:23c

Address: 1728 Downing
Denver, CO 80218

Federal Employer
I.D. Number: _____

00040774835

12
 COLORADO DEMOCRATIC PARTY
 PHONE CODE: 47

CONTACT PERSON: SIGRID FREESE
 (freeze)
 CONTACT #: (303) 830-8989

HELLO IS MR/MS _____ IN PLEASE. YES. GREAT! GOOD EVENING, THIS IS _____ CALLING ON BEHALF OF THE COLORADO DEMOCRATIC PARTY.

I'LL BE BRIEF AND TO THE POINT. CHAIRMAN BOUIE SEWELL (boo-ee sue-ee) HAS ASKED ME TO CALL TO PERSONALLY THANK YOU FOR ALL YOUR PAST HELP IN BUILDING A SOLID PLACE FOR US DEMOCRATS HERE IN COLORADO.

AFTER 8 LONG YEARS, WE FINALLY HAVE A CHANCE TO TAKE BACK THE WHITE HOUSE. ALL THE POLLS SHOW DUKAKIS IN A TIGHT RACE WITH BUSH, AND COLORADO IS RIGHT IN THE THICK OF IT. UNLESS WE WANT BUSH TO TAKE REAGAN'S PLACE, COLORADO MUST DO ITS PART FOR DUKAKIS, AND FOR COLORADO TO GO DEMOCRATIC WE MUST MOBILIZE ALL OUR SUPPORT.

MR/MS _____, THIS IS IT FOR US DEMOCRATS. THE NEXT FEW WEEKS WILL MAKE THE DIFFERENCE, AND WE'RE GEARING UP FOR ONE LAST PUSH THAT WILL CARRY OUR MOMENTUM THROUGH ELECTION DAY. YOU'VE HELPED SO MUCH IN THE PAST, AND WE NEED YOUR HELP ONE FINAL TIME. WE'RE ASKING COLORADO DEMOCRATS FOR AN ELECTION CONTRIBUTION OF \$100. A LOT OF PEOPLE HAVE BEEN GIVING MORE, SOME LESS. IT'S REALLY UP TO YOU. CAN WE COUNT ON YOU, MR/MS _____, FOR A FINAL CONTRIBUTION OF \$100 ?

1. IF THEY HESITATE OR SAY NO: MR/MS _____, I REALIZE \$100 IS A LOT OF MONEY AND A STEEP REQUEST AND I'M SORRY IF I SHOCKED YOU WITH THAT. PUTTING A DEMOCRAT IN THE WHITE HOUSE WON'T BE EASY AND OUT ORGANIZING THE REPUBLICANS IS A BIG TASK. KNOWING THE IMPORTANCE OF GETTING THIS JOB DONE, WE'VE BEEN ASKING THOSE WHO CAN'T AFFORD \$100, TO DROP DOWN TO A MORE AFFORDABLE AMOUNT. MANY PEOPLE HAVE BEEN GIVING AROUND \$48, WHICH IS ABOUT \$4 A MONTH OVER THE YEAR. CAN YOU HELP US WITH \$48 ?

2. I'VE ALREADY CONTRIBUTED: I DON'T BY ANY MEANS WANT YOU TO THINK WE DON'T RECOGNIZE YOUR PAST INVOLVEMENT AND SUPPORT. WE'RE DEEPLY GRATEFUL FOR IT. IF WE'RE GOING TO ELECT A DEMOCRAT TO THE WHITE HOUSE AND SUPPORT DEMOCRATS AT ALL LEVELS IN COLORADO ALL OF US NEED TO PITCH IN AND DIG DEEP. THAT'S WHY WE'RE CALLING, MR/MS _____. BECAUSE OF YOUR PAST SUPPORT, DO YOU SUPPOSE THIS TIME AROUND YOU COULD CONTRIBUTE AT A LOWER LEVEL OF JUST \$36, WHICH IS ABOUT \$3 A MONTH OVER A YEAR ?

3. NO MONEY: ACTUALLY I'VE TALKED WITH SEVERAL PEOPLE IN THE PAST HOUR IN A SIMILAR SITUATION, MR/MS _____, AND WHAT WE'VE BEEN ABLE TO WORK OUT TOGETHER IS A DONATION THAT IS MORE AFFORDABLE AND MAKES BETTER SENSE FOR YOU FINANCIALLY. WHAT OTHER PEOPLE HAVE DONE IS DROP DOWN, AND MOST ARE GIVING IN THE NEIGHBORHOOD OF \$24, WHICH WORKS OUT TO ABOUT \$2 A MONTH OVER THE COURSE OF A YEAR. CAN YOU HELP US WITH AN \$24 CONTRIBUTION ?

4. I'M BACKING A SPECIFIC CANDIDATE: THAT'S GREAT THAT YOU ARE HELPING OUT _____. I'VE TALKED WITH SEVERAL PEOPLE WHO ARE SUPPORTING CANDIDATES AND CAUSES THIS YEAR. PLEASE KEEP IN MIND THAT THE EFFORTS OF THE COLORADO DEMOCRATIC PARTY HELP ALL DEMOCRATS AT EVERY LEVEL, AND DO SO SIGNIFICANTLY. KNOWING THAT, CAN YOU HELP US WITH A SMALLER CONTRIBUTION OF JUST \$36.

DEMOCRATS

P.O. BOX 306
DENVER, CO 80201-0306

Thank you very much for your recent financial pledge. Your contribution will enable us to continue to develop a strong and effective State Democratic Party.

Your contribution will be used for voter registration, voter identification and voter persuasion programs to the benefit of all Democratic elected officials and candidates in our state.

Please return your check in the enclosed envelope within two weeks. Together we will be victorious!

Sincerely,

Buie Seawell
State Chair
Colorado Democratic Party

==

Contributions or gifts to this organization are not deductible as charitable contributions for Federal Income Tax purposes.

RETAIN THIS STUB
FOR YOUR RECORDS

MY DONATION IS

\$ _____

--- DETACH ALONG THIS PERFORATION ---

PLEASE MAKE CHECK PAYABLE TO:
COLORADO DEMOCRATIC PARTY

DO NOT ENCLOSE CASH

PLEDGE AMOUNT

[_____]

I AM ENCLOSING

[_____]

PLEASE RETURN THIS PORTION WITH YOUR
DONATION TO AVOID ADDITIONAL BILLING.

7 2 0 1 2 0 4 0 0 0

1d.

Date of receipt	Date of deposit	Amount
January 13, 1988	January 15, 1988	\$ 12,588.50
January 27, 1988	January 29, 1988	4,530.00
February 10, 1988	February 11, 1988	3,317.00
February 26, 1988	February 29, 1988	2,494.00
March 9, 1988	March 10, 1988	1,939.50
March 23, 1988	March 25, 1988	1,091.00

COLORADO DEMOCRATIC PARTY JANUARY 1988 MONTHLY EXPENSE SUMMARY

PRINTING	2nd billing - 695	104.25
	3rd billing - 320	48.00
POSTAGE	2nd billing - 695	152.90
	Thrid billing - 320	70.40
COMPUTER		16.63
MISCELLANEOUS	Shipments.	120.25
TOTAL MONTHLY EXPENSES:		\$512.43

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COLORADO DEMOCRATIC PARTY FEBRUARY 1988 MONTHLY EXPENSE SUMMARY

PRINTING	3rd billing - 741	111.15
POSTAGE	3rd billing - 741	163.02
COMPUTER TIME	1.002 hours at \$75 per hour.	75.19
MISCELLANEOUS	Shipments.	106.00
	TOTAL EXPENSES:	\$455.36

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COLORADO DEMOCRATIC PARTY MARCH MONTHLY EXPENSE SUMMARY

GORDON & SCHWENKMEYER FEES	9,617 attempts at .55¢ per attempt.	5,327.85
	10,087 attempts at .37¢ per attempt.	3,732.19
PHONE CHARGES	16,017 minutes at .20¢ per minute.	3,203.40
PRINTING	First billing - 4,117	617.55
	Third billing - 217	32.55
POSTAGE	First billing - 4,117	905.74
	Third billing - 216	47.74
COMPUTER TIME	2.88 hours at \$75 per hour.	215.85
DATA ENTRY	22 hours at \$12 per hour.	264.00
COMPUTER PAPER	742 pages at .05¢ per page.	37.10
MISCELLANEOUS	Shipments.	46.90
	TOTAL EXPENSES:	\$14,430.87

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HAND DELIVERED
FEDERAL ELECTION COMMISSION
ADMINISTRATIVE DIVISION
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06C2112

DAVIS, GRAHAM & STUBBS
ATTORNEYS AT LAW

WASHINGTON D.C. OFFICE
SUITE 500
1001 TWENTY-SECOND STREET, N.W.
WASHINGTON, D.C. 20037-1803
TELEPHONE 202-822-8660

SUITE 4700
370 SEVENTEENTH STREET
POST OFFICE BOX 185
DENVER, COLORADO 80201-0185

SALT LAKE CITY OFFICE
SUITE 1600-87
EAGLE GATE TOWER
60 EAST SOUTH TEMPLE
SALT LAKE CITY, UTAH 84111-1006
TELEPHONE 801-328-6000

TELEPHONE 303-892-9400
TELECOPIER 303-893-1379
TELEX 240451 DGS DVR
CABLE DAYGRAM, DENVER

ELIZABETH J. LENTINI
892-7465

Federal Express

March 8, 1989

Frania Monarski
Federal Election Commission
Washington, D.C. 20463

RE: MUR 2808

Dear Ms. Monarski:

Enclosed please find the responses of the Democratic State Central Committee of Colorado to the Questions and Request for Production of Documents of the Federal Election Commission received by the Committee in connection with the referenced MUR.

I reserve the right to supplement our responses. In particular, I will submit the list of individual contributors who contributed to the Committee through Gordon & Schwenkmeyer's telemarketing services during the period in question in order to verify to you that no contributions in excess of \$200 were received during the period in question. I anticipate that this material will be submitted within one week.

Very truly yours,

Elizabeth J. Lentini
Elizabeth J. Lentini
Counsel, Democratic State
Central Committee of Colorado

0004077432

COMM-9 PM 2:00

QUESTIONS AND REQUEST FOR PRODUCTION OF DOCUMENTS

QUESTION 1. Describe in detail the fundraising services performed by Gordon & Schwenkmeyer on behalf of the Democratic State Central Committee (of Colorado). Provide copies of all contracts between Gordon & Schwenkmeyer and the Democratic State Central Committee (of Colorado).

RESPONSE 1. The firm of Gordon & Schwenkmeyer ("G&S") provides telemarketing services to the Democratic State Central Committee of the State of Colorado (the "Committee"). Working from a list of donors provided to them by the Committee, G&S personnel call these individuals from one to three times per year and request funds for the Committee. Individuals who agree to contribute are sent a thank-you note and envelope for the contribution to be returned in.

The list of donors used for calling does not include any corporations or unions or any individuals who in the past have contributed more than \$100 to the Committee. The average contribution received by G&S as a result of these activities is \$18.

The envelopes are mailed by contributors to a post office box in Colorado, and then approximately twice a month (or more frequently, if necessary) the accumulated envelopes are sent en masse by the Postmaster via Federal Express to G&S at its California office. There the envelopes are opened, the contributions recorded, and deposited to a custodial account for the Committee. If any corporate or union contributions are found, or if any individual contributions exceed \$200, G&S's standard procedure is to send such contributions directly to the Committee. There have been no corporate or union contributions received as a result of G&S's telemarketing services since 1986, when G&S began providing these services to the Committee.

Every month, G&S removes from the custodial account an amount sufficient to cover its expenses in a given period, and the balance of the contributions (less approximately \$1,000 to account for bad checks, etc.) are sent to the Committee. Also each month the Committee receives from G&S a record of expenses and contributions which includes detail showing number of calls made, pledges made, contributions received, etc. (See Attachment 1). On a quarterly basis G&S provides the Committee with a list of individual contributions

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for the preceding period. The Committee reviews this list to confirm that no individual has exceeded the \$200 limit and needs to be reported separately.

A copy of the contract between G&S and the Committee from April 1, 1987-March 31, 1988 is attached. (See Attachment 2)

Sigrid Freese (1)(2)
Chris Schwenkmeyer (1)

QUESTION 1a. Indicate the dates that Gordon & Schwenkmeyer performed these fundraising activities.

RESPONSE 1a. G&S has provided the Committee with telemarketing services from approximately May 1986 until the present.

Sigrid Freese (1)

QUESTION 1b. Outline the procedure of the Democratic State Committee for accounting for the contributions received and the expenditures made on its behalf by Gordon & Schwenkmeyer including an explanation of any records kept of receipts and expenses.

RESPONSE 1b. As described above, the Committee reviews the record of individual contributors on a quarterly basis to confirm that the \$200 individual limit has not been exceeded. Attachment 1 is a sample of the records of gross receipts and expenditures sent to the Committee by G&S. Attachment 3 is a sample of the records of individual contributions which the Committee receives from G&S. The Committee is in custody of all such records which it has received since G&S began providing services to the Committee in 1986.

Sigrid Freese (1)(2)

-
- (1) Person who is capable of furnishing testimony concerning the response.
(2) Person who provided documentary input.

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QUESTION 1c. State the total amount of funds deposited into the "custodial account" by Gordon & Schwenkmeyer on behalf of the Democratic State Central Committee (of Colorado) from January 1, 1988 until March 31, 1988.

RESPONSE 1c. \$25,960.

Chris Schwenkmeyer (2)

QUESTION 1d. State the total amount of expenses incurred by Gordon & Schwenkmeyer on behalf of the Democratic State Central Committee (of Colorado) from January 1, 1988 until March 31, 1988.

RESPONSE 1d. As shown on the G&S monthly expense summaries submitted to the Committee for the months of January, February and March, 1988 (See Attachment 4), G&S incurred a total of \$15,398.66 in expenses during the period in question.

Sigrid Freese (1)(2)

QUESTION 2. Describe in detail how much of the funds raised by Gordon & Schwenkmeyer were deposited into the federal account of the Democratic State Central Committee (of Colorado) and how much of the funds were deposited into the non-federal account of the Democratic State Central Committee (of Colorado).

RESPONSE 2. As shown below, during the period in question, \$10,000 of funds raised by G&S were deposited into the federal account of the Committee and \$20,000 of such funds were deposited into the non-federal account.

**Funds Received by the Committee From G&S
During the Period January 1, 1988 - March 31, 1988**

<u>Date Deposited</u>	<u>Amount</u>	<u>Where Deposited</u>
January 4, 1988	\$ 15,000	Non-federal account
February 9, 1988	10,000	Federal account
February 26, 1988	5,000	Non-federal account

- (1) Person who is capable of furnishing testimony concerning the response.
(2) Person who provided documentary input.

Democratic State Central
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Because of the time lag involved in receiving funds from G&S after they are sent in by contributors and deposited to the custodial account, all of the funds deposited into the Committee's federal and non-federal accounts during the period January 1, 1988-March 31, 1988 were not necessarily the same funds deposited into the custodial account during the period January 1, 1988-March 31, 1988. For example, the funds deposited into the Committee's non-federal account on January 4, 1988 were undoubtedly initially contributed prior to January 1, 1988.

Sigrid Freese (1)
Janet Landry (1)

QUESTION 3. State whether any of the funds deposited into the "custodial account" included corporate or labor union contributions or individual contributions in excess of \$5,000.

RESPONSE 3. None of the funds deposited into the custodial account during the period in question included any corporate or union contributions or any individual contributions in excess of \$5,000. In addition, none of the funds deposited into the custodial account during the period in question included any individual contributions in excess of \$200.

Sigrid Freese (1)
Chris Schwenkmeyer (1)

(1) Person who is capable of furnishing testimony concerning the response.



COLORADO DEMOCRATIC PARTY NOVEMBER EXPENSE SUMMARY

GORDON AND SCHWENKMEYER FEES	2,991 attempts at .55¢ per attempt.	1,645.05
	4,006 attempts at .37¢ per attempt.	1,482.22
PHONE CHARGES	7,446 minutes at .20¢ per minute.	1,489.20
PRINTING	First billing - 1,707	256.05
	Second billing - 738	110.70
POSTAGE	First billing - 1,707	375.54
	Second billing - 738	162.36
COMPUTER LABOR	5.91 hours at \$75 per hour.	443.57
DATA ENTRY	4 hours at \$12 per hour.	48.00
COMPUTER PAPER	637 pages at .05¢ per page.	31.85
MISCELLANEOUS	Shipments.	69.45
TOTAL MONTHLY EXPENSES		\$6,113.99



COLORADO DEMOCRATIC PARTY NOVEMBER RETURNS SUMMARY

<u>DATE</u>	<u>RETURNS</u>	<u>DOLLARS RETURNED</u>	<u>AV. RETURN</u>
11/5	168	2,788.00	16.59
11/20	186	2,856.00	15.35

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COLORADO DEMOCRATIC PARTY NOVEMBER DAILY ACTIVITY SUMMARY

FILE A1-ROUND 8

<u>DATE</u>	<u>ATTEMPTS</u>	<u>PLEDGES</u>	<u>DOLLARS PLEDGED</u>	<u>AV. PLEDGE</u>
11/18	963	292	5,578.00	19.10
11/19	1,017	270	5,418.00	20.07
11/21	602	142	2,246.00	15.82
11/22	182	64	1,121.00	17.52
11/30	227	74	506.00	6.84

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AGREEMENT

This Agreement is made this ^{1st} ~~15th~~ day of April, 1987, by and between the Colorado Democratic Party (hereinafter "CDP"), and Gordon & Schwenkmeyer, Inc., a California Corporation (hereinafter called "GSI").

W I T N E S S E T H:

WHEREAS, GSI has presented to CDP a proposal for providing services in raising funds through a phone solicitation program and CDP desires to utilize the services of GSI;

NOW THEREFORE, in consideration of the mutual promises contained herein, CDP and GSI hereby agree as follows:

ARTICLE 1. TERM OF AGREEMENT

Section 1.01. TERM. This Agreement shall be effective from April 1, 1987 through March 31, 1988 unless sooner terminated as provided in Article 6.

ARTICLE 2. OBLIGATIONS OF GSI

Section 2.01. RESPONSIBILITIES OF GSI. GSI shall:

- (a) Prepare lists of past contributors to the program, party activists and other party contributors from lists provided by CDP and compute the number of names thereon;
- (b) Prepare all materials to be used by telephone

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solicitors and for billing purposes. Such materials shall be subject to the approval of CDP;

(c) Take the steps necessary to ensure that the content of all solicitations comply with applicable State and Federal laws;

(d) Take all steps necessary to qualify GSI to do business in any state where funds are solicited;

(e) Verify the accuracy of all phone numbers and addresses for all persons on the lists prepared by GSI;

(f) Secure bids and commitments for union commercial printing and services necessary to complete the billing process at the lowest possible cost;

(g) Arrange for telephone service for the phone bank at the lowest possible cost;

(h) Hire, train and supervise phone bank supervisors, phone solicitors and necessary clerical support for fundraising activities;

(i) Supervise telephone fundraising activities on a daily basis;

(j) Make a reasonable effort to contact all persons from lists that are prepared;

(k) Provide CDP with information generated by GSI in its role as an agent of CDP for the purpose of preparing necessary financial and/or political/campaign reports;

(l) Assist CDP with preparing the necessary financial and/or political/campaign reports, as may reasonably be

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requested by CDP;

(m) Open a custodial checking account into which all donations received through the telephone solicitation program shall be deposited. GSI shall serve as custodian of such account;

(m) Pay from GSI funds the following expenses of the program;

(1) Costs of insurance, accountants and other professional services, including insurance sufficient to cover any loss of CDP's records.

(2) Salaries and expenses for all employees necessary for preparing reports and mailing out pledge statements for the first billing. If additional billings are decided upon, the fee will be negotiated at that time.

(3) Salary and expenses of phone bank coordinators to supervise the daily activities of the fundraising efforts.

(4) All costs of advertising for, and hiring of phone solicitors and other necessary employees.

(5) Costs of training sessions for supervisors and phone solicitors.

(6) Costs of supervising the mailing, printing, and preparation of all printed materials.

(7) Costs of supervising the collection and transfer to GSI headquarters of contributions to the program.

(8) Costs of setting up the phone bank.

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(9) Costs of operating the GSI headquarters.

(10) Any other costs necessary for GSI to carry out its responsibilities under this Agreement;

(c) Prepare a financial statement every 30 days, commencing May 1, 1987 which will state the gross income generated by the phone solicitation program, number of attempts, number of contacts, number of pledges, average pledge, total gross income, phone bill, printing bill, computer time bill, data entry fee, postage and net income, as well as fees owed to GSI, and costs incurred by GSI pursuant to Section 3.01. (c) of this Agreement, and provide such statements to CDP; and

Prepare at the end of each quarter a list of all contributors during that quarter, arranged by zip code, and call phone numbers within each zip code. Provide such list to CDP.

(f) Render all other services, acts, or things reasonably necessary to carry out its responsibilities hereunder.

Section 2.02. AMOUNT OF SERVICE. GSI agrees to devote the time necessary to complete performance of the responsibilities described herein. GSI shall consult with CDP on the timing of each cycle of calling, the frequency of calling cycles and the duration between start and finish of each cycle. All pledges will be billed up to three times. GSI will attempt to contact all donors three times. GSI is not precluded hereunder from representing, or performing services for, and being employed by other persons or companies.

Section 2.03. METHOD OF PERFORMANCE. GSI will determine the method, details, and means of performing the

responsibilities described herein after consultation with CDP. GSI will consult with CDP on a weekly basis on the progress of the program and the need to develop targeted program techniques.

Section 2.04. ADDITIONAL STAFF. GSI may, at GSI's expense, employ such assistants as GSI deems necessary to perform the services required of GSI by this agreement.

Section 2.05. INDEPENDENT CONTRACTOR. GSI shall perform the services under this Agreement as an independent contractor and shall not be treated as an employee of CDP for federal, state or local tax purposes or any other purposes.

Section 2.06. OWNERSHIP OF LISTS. Any list provided to GSI pursuant to this Agreement shall remain the property of CDP. GSI's use of such lists shall be restricted to the purposes of the program and under no circumstances shall GSI make such lists available to any party without the express written approval of CDP. Any list developed by GSI shall be owned jointly by GSI and CDP.

Section 2.07. CONFIDENTIALITY. GSI shall, with respect to all information received from and designated by CDP or its agents as confidential during and pursuant to this Agreement, comply with the following conditions:

(a) Hold such information in strict confidence and use same only in connection with the phone solicitation program;

(b) Segregate, avoid commingling of, and otherwise provide adequate physical security for all such confidential information and materials;

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(c) Ensure that any person granted access to such confidential information is familiar with and complies with the terms of this Agreement as they relate to the duties of such person; and

(d) Upon demand of CDP or upon termination of this Agreement, whichever is earlier, GSI shall promptly return to CDP or upon CDP's request, destroy all such documents and other documents containing confidential information received hereunder, including copies in any form whatsoever, or other tangible evidence or impressions of such information, and shall thereafter make no further use thereof.

ARTICLE 3. OBLIGATIONS OF CDP.

Section 3.01. RESPONSIBILITIES OF CDP.

CDP shall:

- (a) Cooperate to the greatest extent possible with GSI to ensure a successful phone solicitation program;
- (b) Provide GSI with lists of names of prior donors and potential donors, with their phone numbers and addresses if available; and
- (c) Pay all costs incurred by GSI for telephone service, printing and postage related to pledges made as a result of the phone solicitation program, for any computer time and staff support utilized in inputting information gained by GSI through the phone solicitation program and for any other expenses reasonably related to GSI's activities hereunder not specifically described in Section 2.01(n). Postage on all first billings will be \$.22. Billing sets are

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approximately \$.15. Computer costs are \$75.00 per CPU hour and \$35.00 per hour for labor. The data entry operator is \$12.00 per hour.

ARTICLE 4. COMPENSATION

Section 4.01. FEES. For its services performed pursuant to this Agreement, GSI shall receive fifty-five cents (\$.55) for each phone call made to a prior donor to the program and shall receive thirty-seven cents (\$.37) for each phone call made to a prospective donor. GSI shall be paid at the rate of \$12.00 an hour plus the applicable phone company charges for phone numbers obtained through directory assistance. GSI shall be paid at the rate of \$12.00 per hour for phone numbers obtained from a phone directory. For the purposes of this agreement, a phone call is considered a complete dial of the phone number followed by a sufficient period in which the phone might be reasonably answered.

Section 4.02. TIME FOR PAYMENT. Upon preparation by GSI of a monthly financial statement provided for in Section 2.01(o), and presentation to CDP, GSI is authorized to withdraw any accrued fees owed to GSI pursuant to Section 4.01(a) and costs incurred pursuant to Section 3.01(c) from the custodial checking account.

ARTICLE 5. TERMINATION

Section 5.01. TERMINATION BY CDP. CDP shall have the right to terminate this Agreement immediately if GSI is unwilling or unable to perform the services required by the terms of this Agreement in a timely fashion, or for cause

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constituting breach of this Agreement. Said termination shall be provided in writing. CDP shall pay GSI all fees earned and expenses incurred through the date of termination.

Section 5.02. TERMINATION BY EITHER PARTY. GSI or CDP shall have the right to terminate this Agreement for any reason on ninety (90) days written notice. GSI shall perform services and be paid its fees and expenses incurred until termination.

Section 5.03. MUTUAL TERMINATION If GSI and CDP otherwise mutually agree to terminate this Agreement, CDP agrees that GSI shall be paid its fees and expenses incurred through the termination date.

ARTICLE 6. GENERAL PROVISIONS

Section 6. 01. NOTICES. Any notices to be given hereunder by either party to the other may be effected either by personal delivery in writing or by mail, registered or certified, postage prepaid with return receipt requested. Mailed notices shall be addressed to the parties at the addresses appearing at the end of this agreement, but each party may change the address by written notice in accordance with this paragraph. Notices delivered personally will be deemed communicated as of actual receipt; mailed notices will be deemed communicated as of two (2) days after mailing.

Section 6.02. PARTIAL INVALIDITY. If any provision in this agreement is held by a court of competent jurisdiction to be invalid, void, or unenforceable, the remaining provisions will nevertheless continue in full force without being impaired

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or invalidated in any way.

Section 6.03. ARBITRATION. Any controversy between the parties hereto involving the construction, interpretation, application, or enforcement of any part of this agreement will, on the written request of one party served on the other, be submitted to arbitration. The arbitration will comply with and be governed by the provisions of the California Arbitration Act, Sections 1280 through 1294.2 of the California Code of Civil Procedures, and as may be amended.

Any such arbitration shall be decided by an arbitrator agreeable to the parties, or otherwise selected in accordance with the California Arbitration Act. Such arbitration shall be held in California and shall be binding on the parties.

Section 6.04. ATTORNEY'S FEES. If any action at law or in equity, including an action for declaratory relief or for arbitration, is brought to enforce or interpret the provisions of this agreement, the prevailing party will be entitled to reasonable attorneys' fees, which may be set by the court or arbitrator in the same action or in a separate action brought for that purpose, in addition to any other relief to which that party may be entitled.

Section 6.05. INDEMNIFICATION. GSI will not be liable to CDP, or to any other person or entity for any acts or omissions in the performance of services under the terms of this agreement or on the part of the employees or agents of GSI unless such acts or omissions are due to wilful misconduct. CDP will indemnify and hold GSI free and harmless from any

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obligations, costs, claims, judgments, attorneys' fees, and attachments arising from, growing out of or in any way connected with the services rendered to CDP under the terms of this agreement, unless GSI is judged by a court of competent jurisdiction to be guilty of wilful misconduct.

Section 6.06. GOVERNING LAW. This agreement will be governed by and construed in accordance with the laws of the State of California.

Section 6.07. AUTHORIZATION TO SIGN. The parties hereby represent and warrant that the persons executing this Agreement are authorized to execute this Agreement and are authorized to obligate the respective parties to perform this Agreement.

Section 6.08. ENTIRE AGREEMENT. This agreement supersedes any and all agreements, either oral or written, between the parties hereto with respect to rendering of services by GSI for CDP and contains all of the covenants and agreements between the parties with respect to the rendering of such services in any manner whatsoever. Each party to this agreement acknowledges that no representations, inducements, promises, or agreements, orally or otherwise, have been made by any party, or anyone acting on behalf of any party, which are not embodied herein, and that no other agreement, statement, or promise not contained in this agreement shall be valid or binding. This Agreement may be signed in counterparts. Any modification of this agreement will be effective only if it is in writing signed by the party to be charged.

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The parties hereto acknowledge that each has read this agreement consisting of eleven (11) pages and agree to its terms and conditions.

Gordon & Schwenkmeyer, Inc.

Colorado Democratic Party

By: _____
Mike Gordon
President
5751 Uplander Way
Culver City, CA 90230

By: Alfred H. Fiese
Executive Director

Federal Employer
I.D. Number: _____

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Attachment 3

Col Contributions 1-1 to 7-31

zip	idnum	name	address	City and State	zip	amount	date	file	
80235 16 (43)	62605	MRS AGNES C BRADY	5819 W MILAN PL	DENVER, CO	80235	10	870113	A7	
	39190	Jenet R. Burns	6258 W. Kensington Avenue	Denver	CO	80235	15	870323	A7
	74278	DARLENE L ERICKSON	3763 S LEE CT	DENVER, CO	80235	10	870609	B7	
	41144	3771 S. HARLAN ST.	3771S HARDIN ST.	Denver	CO	80235	10	870323	A7
	74365	MR RONALD H JOHNSTON	3700 S KIPLING ST	DENVER, CO	80235	10	870220	A7	
	74365	MR RONALD H JOHNSTON	3700 S KIPLING ST	DENVER, CO	80235	10	870323	A7	
	74375	SUZANNE E KOLBUN-JACKSO	3800 S PIERCE ST	DENVER, CO	80235	10	870207	A7	
	74369	JANET K LASPOWSKI	4191 S YURON WAY	LAKEWOOD, CO	80235	10	870220	A7	
	74198	MR PATRICK J NIEBAUER	3783 S LEE COURT	LAKEWOOD, CO	80235	10	870207	A7	
	39194	Raymond Redman	5855 N. Lehigh	Denver	CO	80235	10	870323	A7
	62577	MARY K SMITH	3940 S BENTON WAY	DENVER, CO	80235	35	870113	A7	
	68578	ELIZABETH M WOERTHAN	3550 S HARLAN ST. 167	DENVER, CO	80235	10	870207	A7	
	68578	ELIZABETH H WOERTHAN	3550 S HARLAN ST. 167	DENVER, CO	80235	5	870407	A7	
	SUM	827816					155	1E+07	
	80236	62784	MARY LOU ABISHIRE	3631 W UNION AVE	DENVER, CO	80236	15	870220	A7
	16 (45)	62784	MARY LOU ABISHIRE	3631 W UNION AVE	DENVER, CO	80236	15	870220	A7
723		Arthur Binkley	3056 S. Wolff	Denver	CO	80236	30	870513	A7
68533		MR. RICHARD BONATO	3065 S NEWTON ST	DENVER, CO	80236	7	870206	A7	
68533		MR. RICHARD BONATO	3065 S NEWTON ST	DENVER, CO	80236	5	870429	A7	
7749		VALDA SUE CAGLE	02991 S YATES	DENVER	CO	80236	5	870309	A7
28561		MRS LEO CARDENAS	4429 S XAVIER ST	DENVER, CO	80236	25	870513	A7	
62658		MR RAYMOND S CURTISS	3821 W RUTGERS PL	DENVER, CO	80236	5	870122	A7	
62649		CAROL J DELAGE	3905 W RADCLIFF AVE	DENVER, CO	80236	5	870220	A7	
2881		MRS PAULENE DOLE	3137 S STUART	DENVER CO	80236	35	870105	A7	
2881		MRS PAULENE DOLE	3137 S STUART	DENVER CO	80236	10	870323	A7	
68560		MR NORMAN M ENGLISH	2993 S VRAIN ST	DENVER, CO	80236	80	870220	A7	
62681		MR EZEKIAL GOMEZ	4453 S VRAIN ST	DENVER, CO	80236	10	870407	A7	
8158		MR R JAIN	2743 S GUTHMAN	DENVER	CO	80236	7	870609	A7
62721		YOSHIKO KUMRT	3944 W TEMPLE PL	DENVER, CO	80236	10	870113	A7	
68532		JEAN C LAWRENCE	3042 S ZENOBIA ST	DENVER, CO	80236	10	870407	A7	
7771		ANN PEBBLE	2860 S UTICA	DENVER CO	80236	8	870309	A7	
62727	JUDITH LIPSHICZ	4168 N. UNION AVE.	DENVER	CO	80236	10	870420	A7	
39122	ANN PEBBLE	2761 S Yates St.	Denver	CO	80236	25	870220	A7	
7782	ANN PEBBLE	08720 S UTICA	DENVER	CO	80236	10	870323	A7	
68488	CHERIE S PICARDS	2773 S VRAIN ST	DENVER, CO	80236	7	870207	A7		
68400	MR BILLY P ROBINSON	4263 W ROXBURG PL	DENVER, CO	80236	12	870207	A7		
68944	ELSIE H STABBS	2794 S BALEIGH ST	DENVER, CO	80236	10	870513	A7		
8161	LOUISE STOLLARD	3168 S BALEIGH	DENVER CO	80236	5	870707	B7		
68984	PERDIA C STRALS	4725 W GULF AVE. 903	DENVER, CO	80236	35	870206	A7		
68606	PATRICIA A TILLAPPOH	4577 S MULVEY ST	DENVER, CO	80236	35	870207	A7		
87	MS SAVLEEN WILLIAMS	03423 S VRAINS	DENVER	CO	80236	10	870309	A7	
SUM	1169998					378	2E+07		
80237	8933	David Abell	3753 So. Bebring Ct.	Denver	CO	80237	20	870323	A7
16 (402)	8933	MR WILLIAM R ADAMS	5895 E JEFFERSON AVE	DENVER, CO	80237	5	870407	A7	
	47638	KATHLEEN BACHELLER	3340 S. HILLCREST DR . #1	DENVER, CO	80237	20	870513	A7	
	70485	PHYLLIS J BERARDINI	3792 S QUEBEC ST	DENVER, CO	80237	7	870122	A7	
	37168	Bob Birnberg	4424 S Xenia Street	Denver	CO	80237	10	870309	A7
	82069	MR RONALD L BLACKMON	7791 E OXFORD AVE	DENVER, CO	80237	10	870309	A7	
	68712	BUSAN C BRISS	9020 E NASSAU AVE	DENVER, CO	80237	5	870407	A7	
	70533	RITA H BUNCH	9087 E OXFORD DR	DENVER, CO	80237	5	870207	A7	
	70530	MR GILBERT M CASIAS	9060 E NASSAU AVE	DENVER, CO	80237	35	870309	A7	

ATTACHMENT 3



COLORADO DEMOCRATIC PARTY JANUARY 1988 MONTHLY EXPENSE SUMMARY

PRINTING	2nd billing - 695	104.25
	3rd billing - 320	48.00
POSTAGE	2nd billing - 695	152.90
	Thrid billing - 320	70.40
COMPUTER		16.63
MISCELLANEOUS	Shipments.	120.25
	TOTAL MONTHLY EXPENSES:	\$512.43

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COLORADO DEMOCRATIC PARTY FEBRUARY 1988 MONTHLY EXPENSE SUMMARY

PRINTING	3rd billing - 741	111.15
POSTAGE	3rd billing - 741	163.02
COMPUTER TIME	1.002 hours at \$75 per hour.	75.19
MISCELLANEOUS	Shipments.	106.00
	TOTAL EXPENSES:	\$455.36

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COLORADO DEMOCRATIC PARTY MARCH MONTHLY EXPENSE SUMMARY

GORDON & SCHWENKMEYER FEES	9,617 attempts at .55¢ per attempt.	5,327.85
	10,087 attempts at .37¢ per attempt.	3,732.19
PHONE CHARGES	16,017 minutes at .20¢ per minute.	3,203.40
PRINTING	First billing - 4,117	617.55
	Third billing - 217	32.55
POSTAGE	First billing - 4,117	905.74
	Third billing - 216	47.74
COMPUTER TIME	2.88 hours at \$75 per hour.	215.85
DATA ENTRY	22 hours at \$12 per hour.	264.00
COMPUTER PAPER	742 pages at .05¢ per page.	37.10
MISCELLANEOUS	Shipments.	46.90
	TOTAL EXPENSES:	\$14,430.87

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Cowden &
Schweikmeyer

phone back
contributions

1-1-88 - 3-31-88



ELISABETH FLEENOR	PO BOX 423	PALMER LAKE	CO 80133	3034812593	20.00	880113
FLORENCE L ABEL	1093 S YORK ST	DENVER, CO	80209	7774814	10.00	880309
O CHARLES Abernethy	3024 Marion Street	Denver	CO 80205	2953864	25.00	880113
MR EUGENIO ABEYTA	5045 OSCOLA ST	DENVER	CO 80212	4580196	15.00	880113
DORIS ARBULETA	P O BOX 44 1015 HWY 6 SO	MACK	CO 81525	8587517	5.00	880113
MARGERY D ACKER	7641 W 95TH AVE	BROOMFIELD, CO	80020	4245403	10.00	880210
MR DONALD K ADAMS	1924 12TH AVE	GREELEY	CO 80631	3033523995	25.00	880113
LOUISE ADAMS	190 S 33RD	BOULDER	CO 80303	3034949747	25.00	880113
MR JAMES N ADAMS	1433 FRANKLIN CT	LOUISVILLE, CO	80027	6655481	5.00	880113
Peter Adolph	2120 Glenarm Pl	Denver	CO 80205	3032971299	20.00	880229
Robert R Aitken	2151 W 3RD AV	Durango	CO 81301	3032593759	15.00	880210
DORIS E AKERS	10150 LEE ST	WESTMINSTER, CO	80020	3034661190	15.00	880309
PAPA P ALBRECHT	04306 WILDERNESS	PUEBLO	CO 81008	7195461219	5.00	880113
JOHN/JACQUELIN ALBERTON	1507 W KIDWA ST	CO SPRINGS CO	80904	7196346421	10.00	880127
DIANNE ALEXANDER	522 KANSAS AVE	GRAND JUNCTION CO	81503	3032435937	5.00	880127
DOPOTHY ALEXANDER	4431 RANCH CR	COL SPOS CO	80907	7195997943	15.00	880309
MR HAROLD R ALIREZ	4781 E COLORADO AVE	DENVER, CO	80222	3037571025	10.00	880323
MR LEONARD O ALLEN	1789 S CLAY ST	DENVER, CO	80219	3039358385	12.00	880113
MR DANIEL B ALLISON	6226 W COALMINE PL	LITTLETON	CO 80123	3039798279	10.00	880113
PAMELA P ALTSCHUL	30486 MONROE DR	EVERGREEN CO	80439	3036741696	5.00	880127
DALE J ANDERSEN	06679 S PENNSYLVANIA	LITTLETON	CO 80121	3037951322	18.00	880210
MR & MRS ANDERSON	1926 WOODBURN ST	COLORADO SPOS CO	80906	7196336821	15.00	880127
PAUL & MELISSA ANDERSON	02107 CONSTITUTION	FT COLLINS	CO 80526	3034825658	15.00	880127
ED ANDERSON	1305 JUNIPER	GRAND JUNCTION CO	81505	3032430271	10.00	880113
Ingrid Anderson	1117 S Clayton	Denver	CO 80210	3037229460	75.00	880210
ALVERA R ANDERSON	434 E 6TH ST	RIFLE, CO	81650	3036252648	12.00	880127
MERRILEE SPENCER ANNEBERG MD	2628 65TH AVE	GREELEY CO	80634	3033300443	15.00	880127
ANONYMOUS					1.00	880229
THOMAS ANSELMO	4227 N CHESTNUT ST	COL SPOS CO	80907	7195993038	7.00	880229
George Antoine	6968 S Boulder Road	Boulder	CO 80303	3034945358	20.00	880113
EARLENE ANTONELLI	BASIN ROUTE	REDUALE	CO 81431	3038647838	12.00	880113
Lois Antonelli	1945 S Linden Ct	Denver	CO 80224	7599333	10.00	880113
Zeda M. Arant	875 Main St Apt. 514	Grand Jct	CO 81501	3032455094	10.00	880113
LAUREEN ARBUTHNOT	19623 ROAD H	ORDWAY	CO 81063	7192673256	20.00	880127
SANDRA M ARKO	6066 AMMONS ST	ARVADA, CO	80004	4216703	10.00	880113
FANNIE ARMSTRONG BEY	03300 FOREST	DENVER	CO 80207	3772297	10.00	880229
EDITH ARMSTRONG	1430 S VAUGHN CIR	AURORA CO	80012	3037506086	25.00	880210
EDITH ARMSTRONG	1430 S VAUGHN CIR	AURORA CO	80012	3037306086	25.00	880210
MRS ARLYNE ARNDT	180 S 33RD ST	BOULDER, CO	80303	3034942443	10.00	880113
MARTHA ARNETT	1111 FOREST	BOULDER	CO 80302	3034423406	10.00	880229
REBECCA ARNOLD	P O BOX 626	TABERNASH CO	80478	3037265281	10.00	880113
LETA ARNOLD	2501 E 104TH AVE #379	DENVER	CO 80233	3034570941	25.00	880113
MARLYN L ARY	P O BOX 749	MEEKER, CO	81641	3038785446	15.00	880113
MARGARET A ASHER	10213 E PEAKVIEW AVE	ENGLEWOOD, CO	80111	7701735	5.00	880127
MS ARDYS ASKELSON	BOX 188	INDIAN HILLS CO	80454	3036979219	20.00	880127
GRACE ASPROMONTE	457 5TH AVE	DURANGO CO	81301	3032472625	5.00	880113
SHIRLEY ATENCIO	CRESCENT 73	CENTER	CO 81125	3037542663	20.00	880113
MR E A ATKINSON	PO BOX 36	CASCADE	CO 80809	3036849495	10.00	880113
MR EDWARD A JR AUGDEN	4482 QUITMAN ST	DENVER, CO	80212	4555800	25.00	880113
Florence Austin	1645 Xavier St	Denver	CO 80204	3039730672	5.00	880210
ELAINE AUSTIN	1642 HILLTOP DR	LONGMONT	CO 80501	3037766832	10.00	880113
AMY P AVERY	2569 IRIS ST	LAKEMOOD, CO	80215	3032320792	20.00	880113
MR STEPHEN L AXELROD	765 MONROE ST	DENVER, CO	80206	3778903	25.00	880113
PATSY S AYALA	2335 S JULIAN ST	DENVER	CO 80219	9365400	10.00	880113
CLAIRE K BACHRACH	140 S JERSEY ST	DENVER, CO	80224	3554289	15.00	880229
ARLYCE H BADGER	18197 E ASBURY PLACE	AURORA CO	80013	3037508226	15.00	880127
WILLIAM A BAILEY	10460 EMERSON	DENVER	CO 80233	3034523922	25.00	880127
JEROME & HELEN BAILEY	16993 E ITHACA CIR	AURORA, CO	80013	3036907503	20.00	880127
SHERYL J BAIN	8300 E 104TH WAY	HENDERSON	CO 80640	2877621	10.00	880113
FLORENCE BAIRD	3099 S VINE	DENVER CO	80210	3037572860	30.00	880210

MR AND MRS BAKARICH	8168 W 72ND AVE	ARVADA, CO	80005	3034235771	10.00	880229
EILENE BAKER	541 FLORENCE	AUROPA CO	80010	3033645163	10.00	880127
DAN BAKER	PU BOX 15	BURNS	CO 80426	3036534398	20.00	880229
NANCY L BALL	1121 12TH AVE	GREELEY	CO 80631	3033524652	15.00	880309
NANCY L BALL	1421 12TH AVE	GREELEY	CO 80631	3033524652	15.00	880210
Richard Ballantine	10558 Hwy 550	Durango	CO 81301	3032479679	25.00	880113
DAVE/BARBARA BAMBERGER	110 OLD BROADMOOR RD.	COLO SPRINGS CO	80906	7196341195	30.00	880113
Margaret Barcelona	309 Lewis Ave	La Junta	CO 81050	7193842862	7.00	880229
MR DENNY BARELA	1616 E 78TH AVE. 66	DENVER, CO	80229	3032872953	10.00	880113
BETTY BARGER	1125 N PURCELL BLVD	PUEBLO W CO	81007	7195472409	10.00	880113
CYNTHIA BARKER	06020 VIVIAN ST	ARVADA	CO 80004	4223198	30.00	880113
MR ROBERT M BARKLEY	6775 FAIRVIEW DR	BOULDER, CO	80303	3034942753	25.00	880113
MITZI R BARNES	4955 S EAGLE CREEK	AURORA, CO	80015	3036930129	15.00	880113
Doris Barnes	871 So Holly	Denver	CO 80222	3033220739	5.00	880210
ELAINE BARTLETT	1206 STEELE	DENVER CO	80206	3033931561	5.00	880113
KEITHA L BARTLETT	2010 46TH AVE.	GREELEY, CO	80634	3033305714	25.00	880127
MILDRED BARTLETT	2750 UNIVERSITY HTS	BOULDER, CO	80302	3034424109	25.00	880113
GEORGE A BARTON	551 S OTIS	LAKEWOOD	CO 80226	3039222372	10.00	880309
MR. O. BARTOS	2788 LEE HILL DR	BOULDER	CO 80302	3034433979	20.00	880113
BARBARA BASKERVILLE	00205 N MURRAY BLVD 95	COLO SPRINGS	CO 80916	7195745778	20.00	880113
LARRY BATMAN	5037 KIDWA DR	GREELEY CO	80634	3033301739	25.00	880210
MARTIE BAUDUIT	2760 ILIFF	BOULDER	CO 80303	4944080	15.00	880309
MR ALEX BAUER	02551 MAYFAIR DR	GRAND JCT	CO 81501	3032439264	10.00	880229
ROBERT W BAUER	1400 S COLLYER. #6	LONGMONT	CO 80501	3037765174	40.00	880113
JOHN BAXTER	P O BOX 405	SAGUACHE CO	81149	3036552573	20.00	880309
ANNE BEAHLER	3217 GLADIOLA	COL SPGS CO	80907	7194712482	10.00	880127
JEAN BEAL	1017 PIONEER LANE	COLORADO SPGS CO	80904	7194732273	15.00	880113
MARGURITE BEARD	2041 8TH ST	GRAND JCT CO	81501	3032426961	10.00	880113
DORA H BEASLEY	2811 E 5TH AVE	DENVER, CO	80206	3550253	7.00	880127
MARGARET M BEAZLEY	333 S EATON ST. 620	LAKEWOOD, CO	80226	9221973	15.00	880113
MR ROBERT V BECCO	3224 VAIL AVE	PUEBLO, CO	81005	7195618217	15.00	880127
BETTY C BECHTEL	1923 WINDGATE	GRAND JCT	CO 81503	3032459083	25.00	880113
OPAL BECK	01844 S LAFAYETTE	DENVER	CO 80210	7786097	10.00	880229
GLORIA BEEDY	HCR 66 BOX 14	GENOA CO	80818	3037683263	5.00	880113
GALE G BEERY	150 W. BYERS. #5	DENVER, CO	80223	3037770458	20.00	880210
PATRICIA BEIL	01081 A 13TH ST	DELTA	CO 81416	3038745572	50.00	880127
PRAJEDES/ROSE BEJARNO	910 BROAD ST	MILLIKEN CO	80543	3035874529	10.00	880127
PATRICIA K BELCASTRO	02655 BAHAMAS WAY	GRAND JCT	CO 81501	3032428637	8.00	880113
SALLY J BELDOCK	848 S 13TH AVE	BRIGHTON, CO	80601	6591014	25.00	880113
LUCILLE BELL	3285 OAK CREEK DR	COLO SPRINGS CO	80906	7195765371	10.00	880113
Cathy Bell	Box 331	Silverthorne	CO 80498	3034682138	15.00	880127
MRS RUBY BELLERIS	320 GLENCOE ST	DENVER CO	80220	3033551376	5.00	880127
ALFONSO BENAVIDEZ	PO BOX 28	MODEL	CO 81059	7198463504	25.00	880127
Celina Benavidez	2825 W. 34th Ave.	Denver	CO 80211	4772867	10.00	880113
MR DANIEL C BENAVIDEZ	1833 ARAPAHOE DR	LONGMONT, CO	80501	3037764528	10.00	880229
JOHN BENGSTON	02574 S NOME	AURORA	CO 80014	7550178	20.00	880210
DIANE BENJAMIN	2410 S HUMBOLDT	DENVER CO	80210	3037227604	15.00	880127
JAY BENNETT	9901 E EVANS 31C	DENVER CO	80231	3037511417	10.00	880210
ANN BENSON	07111 S NEWPORT CT	ENGLEWOOD	CO 80112	7703571	25.00	880113
MARJORIE C BENSON	4655-A DILLON COURT	AURORA, CO	80015	6901851	10.00	880113
MS ESTER BENTON	00509 W BASELINE	LAFAYETTE	CO 80026	6654134	50.00	880113
RAYMOND/PEGGY BENTON	1425 MILWAUKEE	DENVER CO	80206	3033558910	15.00	880127
Pauline Benton	P O BOX 75	Coaldale	CO 81222	3039424266	25.00	880113
MR ORRION W BERG	318 S 3RD ST CT	LA SALLE, CO	80645	3032846382	10.00	880113
JACK BERGER	05901 WELD CO RD 21	FT LUPTON	CO 80621	8572854	15.00	880127
JOHN/JULIA BERSHENYI	1206 PITKIN AVE	GLENWOOD SPGS CO	81601	3039456371	25.00	880113
Joe Bicknell	P.O. BOX 745	Denver	CO 80201	3033290025	10.00	880309
JANE M BIGELOW	125 PENNSYLVANIA ST	DENVER	CO 80203	7220091	10.00	880113
John Biocic	2323 N 1ST ST	Grand Jct.	CO 81501	3032453935	10.00	880127
MS CATHIE BIRD	BOULDER CNTY RD 84-W	AI LENS PARK CO	80510	3037472697	15.00	880113

MR ELY H BIRNBAUM	1610 S GINGER CT	DENVER, CO	80222	3037563492	15.00	880210
CAROL A BISDORF	2408 CHEYENNE DR	GOLDEN	80401	3032790055	25.00	880113
MR BLACH	49186 RD H	YUMA	CO 80759	3038482788	25.00	880113
MAYME BLACH	216 S CEDAR ST	YUMA	CO 80759	3038485589	25.00	880127
KRISTIN J BLACK	2380 S MEADE ST	DENVER	CO 80219	3039367732	35.00	880309
MR RONALD L BLACKMON	7791 E OXFORD AVE	DENVER, CO	80237	3037716831	10.00	880309
Omar Blair	2643 Jackson St.	Denver	CO 80205	3033773341	50.00	880309
MS MARION BLAKE	STAR RTE	HOLLY CO	81047	7195376766	5.00	880127
MARGARET J BLANCHETTE	590 BLOSSOM COURT	GRAND JCT	CO 81503	3032455888	10.00	880113
DORIS A BLANTON	48 POSADA DR	PUEBLO, CO	81005	7195614380	20.00	880127
MR CLINTON E JR BLAUER	4785 E AMHERST AVE	DENVER, CO	80222	7581046	10.00	880127
Louis R Bloom	2240 Linden Ave	Boulder	CO 80302	3034494096	10.00	880309
Louis R Bloom	2240 Linden Ave	Boulder	CO 80302	3034494096	10.00	880309
DOROTHY R BLUE	4218 W 49TH AVE	DENVER	CO 80212	3034334626	5.00	880113
DOROTHY M BOERSIG	1650 LEWIS ST	LAKEWOOD	CO 80215	2371222	10.00	880127
LOUIS BOETTE	6620 W 73RD PL	ARVADA	CO 80003	3034215322	15.00	880113
L WINIFRED BOGGESS	2950 GRAPE ST	DENVER, CO	80207	3033775522	7.00	880229
LUCILLE BOGGESS	2844 HUMBOLDT ST	DENVER, CO	80205	3032971676	24.00	880113
MR JOHN R BOHM	55 IVANHOE ST	DENVER, CO	80220	3200050	40.00	880229
GENEVA H BOLANOVICH	2545 MILLER ST	LAKEWOOD, CO	80215	3032333337	10.00	880127
MR JOHN BOLCHUNOS	6895 NELSON ST	ARVADA	CO 80004	4226387	10.00	880113
CORLISSA L BOLDEN	2271 LOCUST ST	DENVER, CO	80207	3033774092	15.00	880113
VIVIAN BOLIN	2760 5TH ST	BOULDER, CO	80302	3034431297	10.00	880127
MR RICHARD BONATO	3065 S NEWTON ST	DENVER, CO	80236	3039347384	5.00	880113
MR DANIEL J BOOTH	3160 23RD ST	BOULDER, CO	80302	3034404166	10.00	880309
EARL BOSIER	1960 S WASHINGTON	DENVER, CO	80210	3037337440	10.00	880113
CRISTINE E BOSWELL	755 GLENCOE ST	DENVER, CO	80220	3771712	25.00	880113
HELEN L BOURRIE	1116 KENTON ST	AURORA, CO	80010	3033663447	10.00	880210
MARGARET BOWDEY	2225 FLORAL DR	BOULDER	CO 80304	3034428967	15.00	880127
DANIEL BOWERS	124 DEER TRAIL COURT	BOULDER	CO 80302	3034449763	10.00	880113
ELIZABETH A BOWERS	1808 LAKESIDE DR	GREELEY, CO	80631	3521746	30.00	880113
LAURA W BOWKER	530 MEADOWLARK DR	LAKEWOOD, CO	80226	3032372675	25.00	880229
MARY S BOWMAN	507 BUTTE CIR	DURANGO, CO	81301	3032475190	10.00	880309
SUZANNE MARIE BOYCE	1301 BENNETT AVE	COLORADO SPRINGS	CO 80909	7196350160	10.00	880113
ADRIAN BRADFIELD	PO BOX 57	CAHONE	CO 81320	3035624470	20.00	880127
ELEANOR BRADIN	1675 DOGWOOD LN	BOULDER	CO 80302	3034494766	12.00	880113
MR HOWARD BRAND	7627 S WILLIAMS ST	LITTLETON CO	80122	3037989281	25.00	880323
MRS LOUISE BRANSTRATOR	391 COPPERDALE LANE	GOLDEN, CO	80403	3036423277	5.00	880113
MR TERRY C BRATTON	7487 S CARR WAY	LITTLETON	CO 80123	9795238	20.00	880309
MARGARET R BRAUN	659 ALBION ST	DENVER, CO	80220	3033883160	5.00	880127
VIRGINIA BREAKER	1730 ZINNIA ST	GOLDEN	CO 80401	3032377931	10.00	880113
SALOME J BRECK	2060 E ST PAUL ST	DENVER, CO	80210	7560469	25.00	880309
MS NELLIE BREHM	02624 WOLFF ST	DENVER	CO 80212	4330206	12.00	880229
DORIS BRENNAN	1915 E 3RD	DURANGO CO	81301	3032471489	15.00	880113
MAY BREYER	PO BOX 1142	WINDSOR CO	80550	3036865004	5.00	880113
JACK BRINKERHOFF	900 FLORIDA RD	DURANGO CO	81301	3032475298	5.00	880113
DON/BARRY BRINTON	212 BASSETT DR	COLORADO SPGS CO	80910	7196346457	10.00	880229
M/M W BRITTON	825 S DALE CT	DENVER CO	80219	3039363235	5.00	880127
MR MARSHALL D BRODSKY	1445 BIRCH ST	DENVER, CO	80220	3033213993	20.00	880113
SONIA Z BRONSTEIN	2457 S DAHLIA LN	DENVER, CO	80222	3037571421	7.00	880127
THELMA BROOKS	2250 MONACO PKWY	DENVER CO	80207	3033883367	20.00	880309
JOYCE M BROOKS	12925 LINDA VISTA DR	LONGMONT, CO	80501	3037728947	15.00	880309
M/M DONALD BROWN	211 E 37 ST	DURANGO CO	81301	3032475128	15.00	880210
M/M DONALD BROWN	211 E 37 ST	DURANGO CO	81301	3032475128	25.00	880113
JANE N BROWN	2402 PASEO RD	COLORADO SPRINGS, CO	80907	7196348022	15.00	880309
William Brown	582 S Maple St	Fruita	CO 81521	8589661	25.00	880127
FRANCES P BROWN	2950 WASHINGTON ST	BOULDER, CO	80302	3034478936	15.00	880127
DIANE M BROWN	8101 E DARTMOUTH AVE. 74	DENVER, CO	80231	6963152	25.00	880127
MR ELBERT D BROWN	12957 E 48TH AVE	DENVER, CO	80239	3032734080	25.00	880309
MR LAWRENCE L BROWN WELLS	4640 S JASON ST	ENGLEWOOD, CO	80110	3037814570	15.00	880113

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CECIL BROYLES	12108 COST CANYON TR	PARKER CO	80134	3038412018	15 00	880323
MR JERRY F BRUND	1365 VANCE ST	LAKWOOD, CO	80215	3032337800	25 00	890113
JEAN M BRUNS	320 45TH AVE	GREELEY CO	80634	3033560736	25 00	880127
LELA M BRUTON	2673 GLENCOE ST	DENVER, CO	80207	3033551058	5 00	880113
RUTH B BUCHAN	2965 4TH ST	BOULDER, CO	80302	3034490158	25 00	880113
BERNARD BUCHANAN	9887 CNTY RD 50	YUMA CO	80759	3038482673	10 00	880113
R H BUCHANAN	PO BOX 251	ALAMOSA CO	81101	7195892711	20 00	880113
CARMAN BUCKLEY	3575 EUDORA ST	DENVER, CO	80207	3033559149	10 00	880210
MS MARION BUDZ	10734 W MARLOWE PL	LITTLETON CO	80127	3039732613	15 00	880127
MARGUERITE A BULLOCK	2376 S ACOMA ST	DENVER CO	80223	7779631	10 00	880309
KEVIN BUNNELL	1010 ROSE HILL	BOULDER CO	80302	3034430642	35 00	880113
PETER BURCHARD	01200 DEXTER	DENVER CO	80220	3335970	10 00	880113
LINDA M BURCHETT	2405 W 20TH ST	GREELEY CO	80631	3033568118	5 00	880113
MRS DOROTHY BURGER	130 S DEPEW	LAKWOOD CO	80226	3032376092	15 00	880229
MR DOUGLAS BURGER	01601 HILLSIDE RD	BOULDER CO	80302	3034439182	25 00	880127
ADELINE A BURRIS	2651 S HAZEL CT	DENVER CO	80219	9358226	5 00	880113
MAYBELLE BUSBY	1800 W KENTUCKY	DENVER CO	80223	3039360710	10 00	880113
Farlene Busch	5225 Niwot Road	Longmont CO	80501	3035301619	20 00	880127
Roseann Busch	2415 Meade St	DENVER CO	80211	4555782	20 00	880127
JOSEPH BUSH	4632 3 109TH CT	DENVER CO	80233	3034526855	20 00	880127
MARY F BUTLER	01894 18TH AVE	GREELEY CO	80631	3338939	10 00	880113
RICHARD BUTLER	7983 GRASMERE DR	BOULDER CO	80301	3035302156	25 00	880229
M/M ANTHONY BYRNE	9595 OXFORD RD	LONGMONT CO	80501	3036522866	10 00	880127
MR CHARLES L CADY	303 BRENTWOOD ST	LAKWOOD, CO	80226	3032382908	25 00	880113
RAY CALDERON	614 FOLK	PUEBLO CO	81004	7195435978	12 00	880229
GABRIEL CALDERON	2500 GROVE	DENVER CO	80211	3034555931	15 00	880127
MR CLARENCE N CALDWELL	2862 KRAMERIA ST	DENVER, CO	80207	3220936	5 00	880113
LILA L CALKINS	2900 E BELLEVIEW AVE	LITTLETON, CO	80121	3037710214	10 00	880113
HELEN M CANNY	4272 OSCEOLA ST	DENVER, CO	80212	3034773159	10 00	880210
LAUREN M CANTRICK	375 BATES AVE	BOULDER, CO	80303	3034945283	20 00	880309
INA CAPPS	1501 E 160TH AVE	BROOMFIELD CO	80020	3034528040	20 00	880210
EVELYN CARANTA	307 4TH ST	DURANGO CO	81301	3032471279	5 00	880210
EVA CARBERRY	239 YEW LANE	BAILEY CO	80421	3039387029	20 00	880229
MARGARET CARIENS	8371 RALPH LN	DENVER CO	80221	3034288766	15 00	880210
NANCY A CARLISLE	1446 S CLARKSON ST	DENVER CO	80210	7333040	5 00	880113
MR GEORGE A CARLOW	343 CAPITOL ST., P.O. BOX 309	EAGLE, CO	81631	3033286814	25 00	880113
MR. LOYD CARLSON	01155 GRAND AVE	GRAND JCT CO	81501	3032437257	20 00	880127
DR. R CARLSON	11176 PEARL ST	NORTHGLENN CO	80233	3034521493	7 00	880113
MELBA S CARLSON	970 NORTH ST., #202	BOULDER, CO	80302	3034428449	10 00	880113
MR JOHN U CARLSON	1750 HUDSON ST	DENVER, CO	80220	3033776190	75 00	880113
PHILIP CARNEY	11794 MELODY DR	DENVER CO	80234	3034527023	25 00	880229
PATRICIA CARPIO	3705 TEJON	DENVER CO	80211	3034581711	15 00	880113
DELPHINE CARPIO	3428 W CLYDE PL	DENVER, CO	80211	3034556113	12 00	880127
DAVID CARTER	5110 W 101 CIRCLE	WESTMINSTER CO	80030	3034660292	15 00	880113
JEAN R CARTER	3096 W HARVARD AV	DENVER CO	80219	9359437	25 00	880113
MARY S CASIAS	1880 S YUMA ST	DENVER CO	80223	9369668	10 00	880113
MARGARET CASPER	6780 S CLERMONT ST	LITTLETON, CO	80122	3037702619	10 00	880113
MR JAMES CASTEEL	1523 LEXINGTON RD	PUEBLO CO	81001	7195842413	35 00	880323
MOLLY LU CASTLEBERRY	56 SO GRANT STREET	DENVER, CO	80209	3037224148	5 00	880113
MR BOB CATES	514 VISTA GRANDE RD	GRAND JCT CO	81503	3032432360	10 00	880210
MR WILLIAM J CAYER	1475 S DOVER WAY	LAKWOOD, CO	80226	3039852929	20 00	880127
STEPHANIE A CELENTANO	5420 FIELD CT	ARVADA CO	80002	3034236984	5 00	880113
Lucy Cerise	3006 EMMA RD.	BAFALT CO	81623	3039273217	15 00	880210
MR JOSE A CHACON	878 KALAMATH ST	DENVER CO	80204	5739579	5 00	880113
GEORGE E & JUNE J CHAMBERLAIN	716 SPRUCE ST	BOULDER, CO	80302	3034478469	15 00	880113
MR ROBERT M JR CHAMBERLAIN	420 W FRANCIS	ASPEN, CO	81611	9257509	50 00	880127
CYNTHIA N CHAPMAN	695 S GLENCOE ST	DENVER, CO	80222	3882225	5 00	880210
BOB CHARLES	01436 N CHESTNUT	COLO SPRINGS CO	80907	7194751037	10 00	880127
LILLIAN R CHASE	2703 MILWAUKEE ST	DENVER, CO	80205	3339543	5 00	880113
NEMECIO CHAVEZ	934 So Tennyson	Denver, CO	80219	3039348083	15 00	880210

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CONRAD L CHAVEZ	2016 DELWOOD AVE	DURANGO	CO 81301	3032475158	20.00	880113
Charles Chaves	1430 Duray Ave	Grand Junction	CO 81501	3032452394	10.00	880113
DORIS E CHEEVER	10970 KLENNON DR	LAKEWOOD, CO	80226	3039867928	10.00	880113
Adelaide Cheney	2325 Kearney	Denver	CO 80207	3033885292	10.00	880113
BETSY B CHEROUTES	1965 LEYDEN ST	DENVER, CO	80220	3033776515	10.00	880127
Mary Ann Chinn	24505 Hwy 52	Hudson	CO 80642	5369216	75.00	880113
DIANE CHOATE	805 S JERSEY	DENVER CO	80224	3033338151	25.00	880113
HERBERT CHONTOS	6571 DELIVERANCE CT	COLO SPRINGS CO	80918	7195980390	15.00	880113
GEORGE CHRISTIE	1200 EMERSON	DENVER CO	80218	3038317403	20.00	880210
MR FRANK CIOCHETTO	02102 S DIATHE	AURORA	CO 80013	7550674	5.00	880127
JOHN CLARK	2324 BIRCH	DENVER CO	80207	3033884789	10.00	880113
BETTY K CLARK	274 - 29 ROAD	GRAND JUNCTION, CO	81503	3032432645	12.00	880113
MR KENNETH E CLARK	2049 KENTON ST	AURORA, CO	80010	3033670739	15.00	880309
MR LARRY CLARK	10135 LEE LN	LAKEWOOD	CO 80215	3032374998	10.00	880113
MR MARTIN J CLEMENS	758 GALENA ST	AURORA, CO	80010	3033645723	10.00	880127
EDNA M CLEMENS	3988 FULLER CT	BOULDER, CO	80303	3034943649	20.00	880210
MR FRED A CLENCH	6817 NEWCOMBE ST	ARVADA	CO 80004	4213252	50.00	880309
STEVEN CLIFFORD	07764 JADE CT	BOULDER	CO 80303	3034992381	20.00	880113
MARGARET CLIFFORD	2503 23RD	BOULDER CO	80302	3034432911	20.00	880113
AGNES CLIFTON	1462 SO SHERMAN	DENVER CO	80210	3037337475	5.00	880113
JIM CLOMAN	PO BOX 32	PAGOSA SPRINGS	CO 81147	3032645525	25.00	880113
ALBERTA M COBLE	808 S UMATILLA ST	DENVER	CO 80223	9352028	10.00	880309
AL COCO	800 S JACKSON	DENVER CO	80209	3037229481	25.00	880113
WILLIAM COE	01374 3RD AVE	DURANGO	CO 81301	3032478252	10.00	880309
MR & MRS FLOYD COFFEY	RR	CAHONE CO	81320	3035624870	10.00	880127
GWEN COFFEY	8584 GARFIELD CRT	THORSTON CO	80229	3032876618	15.00	880229
Larry Cogburn	P O BOX 67	Gilcrest	CO 80623	7372963	20.00	880127
LINDA J COHEN	3171 S JASMINE WAY	DENVER, CO	80222	7581830	50.00	880127
ROENNA R COHEN	1441 BELLAIRE DR	CO	0 SPR	6329540	25.00	880229
M/M JOHANN COHN	1208 S BRENTWOOD ST	LAKEWOOD CO	80226	3039863358	15.00	880127
BLANCHE M COLEMAN	320 S REDLANDS ROAD	GRAND JCT	CO 81503	3032420219	5.00	880210
ROBERT COLLINS JR	16588 W 73RD DR	GOLDEN CO	80403	3034249144	10.00	880113
MARIAN J COLLINS	165 EMERALD STREET	BROOMFIELD	CO 80020	4665256	25.00	880229
CAROL L COLLINS	00362 PIKES PEAK DR	GRAND JCT	CO 81503	2458077	5.00	880113
TIM & EMMYLU COLLINS	1035 S PENNSYLVANIA	DENVER, CO	80209	3037229678	15.00	880113
MR PATRICK L COLLINS	10141 WELD CO RD. 13	LONGMONT, CO	80501	3037723129	20.00	880127
Dolores Conde	1746 Grove St	Denver	CO 80204	4800969	20.00	880127
NANCY CONNICK	2255 LOCUST ST	DENVER, CO	80207	3033886655	75.00	880113
DON/PEGGY BROWN	10092 COUNTY RD 36	YUMA CO	80759	3038483415	10.00	880210
CURTIS COOK	02755 MT HERMAN RD	MONUMENT	CO 80132	4813310	25.00	880113
DORA D COOK	45 WOLFF ST	DENVER	CO 80219	9361441	10.00	880113
MR COOLFY	MAGNOLIA STAR RT	NEDERLAND	CO 80466	3034439810	25.00	880127
MARVIN J COOPER	PO BOX 1093	IDAHO SPRINGS	CO 80452	3035672551	10.00	880229
Margarita Cooper	901 West 14th Ave. B11	Denver	CO 80204	8926668	10.00	880127
DORA CORDOVA	03780 S DELAWARE	ENGLEWOOD	CO 80110	3037610975	25.00	880113
MR MARCOS CORDOVA	3211 S GORDEN ST	ENGLEWOOD, CO	80110	7621836	15.00	880127
James W Corlett	775 Frontal	Denver	CO 80220	3033773636	25.00	880323
TOM & NANCY CORLETT	PO BOX 2026	FRISCO CO	80443	3036680706	50.00	880229
M/M ALBERT CDRUM	1002 HOLMES DR	COLO SGS CO	80909	7195965848	7.00	880113
MR FRANCIS M COSTELLO	6702 GRAY ST	ARVADA, CO	80003	3034225053	5.00	880127
JOSEPH COSTON	6381 WICKLOW CIRCLE E	COLORADO SPGS CO	80916	7195982880	35.00	880113
DORA COUGHLIN	7713 N 41ST ST	LONGMONT	CO 80501	3034420407	15.00	880113
MR EVERETT L CRAPNELL	8201 SANTA FE SPACE 237	LITTLETON CO	80120	3037948766	25.00	880127
MICHELLE CREW	12872 MONROE ST	DENVER	CO 80241	3034574618	20.00	880127
MR BRAD S CROSEMORE	9565 W COAL MINE AVE. #D	LITTLETON, CO	80123	3039794018	25.00	880229
M/M GROVER CROWLEY	7685 JAMES WAY	WESTMINSTER CO	80050	3034290333	15.00	880113
BONNIE CRUMPACKER	1753 COLUMBINE	BOULDER	CO 80302	3034497080	20.00	880210
Mary M Crumble	PO Box 52	Buena Vista	CO 81211	3033956677	25.00	880229
VIRGINIA CULBERTSON	606 FRATT 404	LONGMONT	CO 80501	3037764877	15.00	880127
LEON CULLEN	520 WEST 2ND AVE	YUMA CO	80755	3038482510	5.00	880113

WILLIAM CURTIS	3151 6TH ST	0 0 4 0	BOULDER	8 7	CO	80302	3034424856	25.00	880113
RENEE B CUTLER	363 FAIRFAX ST		DENVER, CO			80220	3554106	20.00	880113
REBA M DALEE	PO BOX 744		HOTCHKISS		CO	81419	3038723382	5.00	880127
MOLLY A DALGETTY	3130 W LOUISIANA AV 508		DENVER		CO	80219	3039349202	5.00	880309
MR CHARLES DALLA	02565 TELLER ST		LAKEWOOD		CO	80215	2337371	12.00	880309
CHARLES DALLA	04990 W 66TH AVE		ARVADA		CO	80003	3034280036	7.00	880229
WAYNE/JANE DANIELS	1488 GREENBRIAR BV		BOULDER		CO	80303	3034991442	25.00	880309
MR SIDNEY DARDEN	813 SO WEBER		COLORADO SPRGS		CO	80903	7194757862	10.00	880127
ARDEEN C DARNELL	2520 18TH AVE		GREELEY		CO	80631	3033539607	10.00	880210
JAMES DAVIS	00413 37TH AVE		GREELEY		CO	80634	3567245	25.00	880113
M/M D DAVIS	3852 JUNIPER CIR		EVERGREEN CO			80439	3036746925	10.00	880113
MARILYN DAVIS	6608 VIVIAN ST		ARVADA CO			80004	3034230683	15.00	880113
MARGARET G DAVIS	420 DUDLEY ST		LAKEWOOD, CO			80226	3032336000	25.00	880127
MARY DAVIDSON	706 W 14TH		PUEBLO CO			81003	7195443621	10.00	880229
KATHLEEN M DAWSON	PO BOX 13		TWO BUTTES		CO	81084	7193265270	10.00	880113
BENNY GAYLE DAWSON	1760 S FAIRFAX ST		DENVER, CO			80222	3037567418	10.00	880113
AMELIA DE ANGELO	1850 CODY ST		LAKEWOOD		CO	80215	2375217	5.00	880113
KATHARINE A DE LONG	00174 LITTLE PARK RD		GRAND JCT		CO	81503	3032432725	10.00	880113
MR PAUL H DEACON	408 SORTAIS RD		DURANGO, CO			81301	3032591937	5.00	880113
JEAN DEAN	02113 17TH ST		GREELEY		CO	80631	3033524596	5.00	880127
JOE JR & MARY LOUISE DECHANT	PO BOX 134		WIT CARSON		CO	80825	3039623362	10.00	880113
GUY DEEDS SR	P O BOX 23		PRITCHETT CO			81064	7195234001	10.00	880113
JEROME DEGREE	785 SCHOOLFIELD RD.		WESTCLIFFE		CO	81252	3037832467	7.00	880210
Anthony DePizzo	1337 Jefferson		Louisville		CO	80027	3036668111	5.00	880113
NATALIE DELUCA	03105 FAIRMOUNT		PUEBLO		CO	81008	7195449040	35.00	880127
LEONEDA DEMARCO	2706 CONCORD		COLOR SPRINGS CO			80907	7196342524	5.00	880229
ANN ORR DESCHANEL	1950 FOLSOM #302		BOULDER		CO	80302	3034430550	15.00	880113
Katherine Detre	1010 S Adams		Denver		CO	80209	3037441541	50.00	880113
CAROL DEVENIR	403 MAXWELL		BOULDER		CO	80302	3034423178	20.00	880127
ANITA R DIAZ	00116 OAK ST		WINDSOR		CO	80590	6865205	15.00	880127
MR BRUDE DICKINSON	00153 S RAINTREE LN		LOUISVILLE		CO	80027	3036652172	25.00	880113
CHARLES DIETERLE	1155 MARINE ST		BOULDER CO			80302	3034427590	20.00	880113
MR JOHN L DIETZ	02139 GLENFAIR RD		GREELEY		CO	80631	3525554	20.00	880210
RICHARD DIETZ	8751 ESSEX ST		DENVER		CO	80229	2876329	10.00	880229
SUSIE DIGIACOMO	10021 BASELINE RD		LAFFETTE CO			80026	3036666691	5.00	880309
ANGELA M DIMARTINI	2550 GROVE ST		DENVER, CO			80211	4777468	20.00	880323
ALVIN DINNSEN	SOUTH STAR RT		FORT MORGAN CO			80701	3034325586	30.00	880113
HELEN K DISMUKES	2626 LAFAYETTE ST		DENVER, CO			80205	3032971851	10.00	880229
MARILYN J DITMER	2501 E. 104TH AVE. #77		DENVER		CO	80233	3034519433	10.00	880113
SCOTT DIXON	4380 WHITNEY PLACE		BOULDER		CO	80303	3034994416	25.00	880113
JOSEPH & TOM DOGGETT	12902 W 24TH PL		GOLDEN		CO	80401	3032332492	10.00	880113
MR ALBIN T DOMBROWSKI	435 S 45TH ST		BOULDER, CO			80303	3034990145	5.00	880113
MR ROBERT H DONOHO	4364 APPLE COURT		BOULDER, CO			80301	3034447131	30.00	880210
MARY DOOLEY	57497 IDA RD		MONTROSE		CO	81401	3032490276	10.00	880309
OPAL DORR	2170 CODY ST		LAKEWOOD CO			80215	3032377364	25.00	880210
CLARENCE DOUGLAS	3580 HELENA ST		AURORA CO			80011	3033665009	12.00	880323
Kimberly Douglas	1220 Hudson St.		Denver		CO	80220	3033775742	12.00	880127
MR JAMES E DOUGLAS	1211 S SHERMAN ST		DENVER		CO	80210	3037781678	5.00	880210
IRENE DOUGLASS	319 SO HIGH SCHOOL		HOLYOKE CO			80734	3038542896	5.00	880113
LILA J DRAKE	03118 D RD		GRAND JUNCTION		CO	81504	3034348212	10.00	880127
LENA DRAPER	9650 HURON 9		DENVER CO			80221	3034260567	25.00	880127
BARBARA DUBIN	639 COOK ST		DENVER, CO			80206	3937988	10.00	880127
HERMENA F DUDLEY	1626 S EMERSON ST		DENVER, CO			80210	3037773753	12.00	880113
EILEEN J DUGGAN	6625 E ARIZONA AVE, B		DENVER, CO			80224	7577502	12.00	880113
NANCY J DUKES	5320 W 29TH AVE		EDGEWATER		CO	80214	2332003	10.00	880113
ERNESTINE DUNCAN	801 YAMPA AVE		CRAIG CO			81625	3038244556	5.00	880113
DORYANN DUNCAN	2510 S WASHINGTON ST		DENVER		CO	80210	7440307	25.00	880210
MRS ELIZABETH DUNLER	1784 S OSWAGO ST		AURORA CO			80012	3037558764	25.00	880113
MR P DURAN	PO BOX 393		MANZANOLA		CO	81058	7194625930	10.00	880210
HARRIETTA DUTY	2160 DOWNING APT 502		DENVER CO			80205	3038395980	20.00	880113

LUIS EADES	1627 5TH ST	BOULDER	CO 80302	3034438426	15.00	880113
MR HARRY D EATON	01330 GAYLORD ST 402	DENVER	CO 80206	3334928	15.00	880127
MARILYN L EBER	10080 E MAPLEWOOD AVE	ENGLEWOOD, CO	80111	3037704752	10.00	880113
MR CHESTER D EBERT	1321 W GILL PL	DENVER	CO 80223	7778024	5.00	880113
EMOGENE F EDWARDS	00131 CANARY LN	GRAND JCT	CO 81503	2410297	10.00	880113
BARBARA A EICHMAN	8365 W 66TH AVE	ARVADA, CO	80004	3034249591	10.00	880113
MR CHAUNCEY L ELAM	1255 GALAPAGO ST B13	DENVER	CO 80204	6296369	15.00	880127
SHARON M ELFENBLIN	170 LAFAYETTE ST	DENVER, CO	80218	7228162	15.00	880113
MARYANNE ELLIS	00913 20 AVE	GREELY	CO 80631	3523444	10.00	880309
MICHAEL ELLIS	605 COLORADO ST	FORT COLLINS CO	80524	3034849029	15.00	880113
VIVA D ELLIS	6573 WIFLING ST	ARVADA	CO 80004	4212125	10.00	880113
OLIVER ELLSWORTH	850 20TH ST, #302	BOULDER	CO 80302	3034426889	25.00	880113
ORAH S ELRON	1140 LEHIGH	BOULDER	CO 80303	3034999066	10.00	880113
MARGARET ELSWICK	862 LEROY DR	DENVER	CO 80233	3034522111	25.00	880127
MR MERRILL EMMETT	860 CLERMONT ST, 708	DENVER, CO	80220	3033298599	40.00	880113
LAWRENCE J EMSING	06785 S LOGAN	LITTLETON	CO 80122	3037942162	30.00	880113
EDYTHE ENGLEMAN	2407 S TENNYSON ST	DENVER, CO	80219	9341216	10.00	880113
TIMOTHY ENGLERT	1840 CENTAUR VILLAGE DRIVE	LAFAYETTE	CO 80026	3036652582	25.00	880113
CONSTANCE G ENGLISH	320 S FAIRFAX ST	DENVER, CO	80227	3552478	10.00	880113
CANDACE C EPPERSON	6212 W 113TH AVE	WESTMINSTER	CO 80020	4692492	10.00	880113
MARY DRU DEMUSO	285 E BRIDGE BOX 489	HOTCHKISS CO	81419	3038723244	20.00	880309
SINFOROSA ESPINOZA	320 W ROUTT AVE	PUEBLO, CO	81004	7195428272	5.00	880127
MR GOVENDOR C ESTES	3816 S PITKIN CIR	AURORA, CO	80013	6937655	10.00	880323
JUANITA R ESTES	150 UTE AVE APT N1	RIFLE, CO	81650	3036252184	5.00	880113
Ada Evans	P O Box 154	Fairplay	CO 80440	7198362449	10.00	880210
DR SARAH H EVANS	1921 NEWPORT ST	DENVER, CO	80220	3033299430	10.00	880113
MR VERNON H EVENSON	2387 S PATTON CT	DENVER, CO	80219	3039355557	10.00	880113
ANNA B FABRY	6525 FENTON ST	ARVADA, CO	80003	3034224976	5.00	880210
MS ROSEMARY FAIR	155 LAFAYETTE ST	DENVER, CO	80218	3037448079	15.00	880210
DEDORAH FALLIN	33 LOGAN ST	DENVER, CO	80203	3037441567	20.00	880229
Beatrice Farnan	2724 S Utica St	Denver	CO 80236	3039360606	15.00	880113
MARY R FARRIS	2565 E NICHOLS CIR	LITTLETON, CO	80122	7960868	25.00	880113
MC COLLEEN A FAUST	5970 BLANCA CT	GOLDEN CO	80403	3032789703	25.00	880210
MARY L FAY	7955 E. LEHIGH AVENUE	DENVER, CO	80237	3036941869	12.00	880309
HEIDI A FEIGA	3023 WASHINGTON ST	BOULDER, CO	80302	3034422042	12.00	880113
CHARLES FELLENEAUM	BOX 4111	BOULDER CO	80306	3034404883	10.00	880127
CLARISSA FETCHER	P O. BOX 80575	STEAMBOAT SPRINGS	CO 80488	3038790998	35.00	880127
BETTY FIELD	00142 W 1ST AVE	DENVER	CO 80223	7771343	7.00	880113
VIRGIL FIELDS	1302 WILLSHIRE	CO SPRINGS CO	80906	7193923909	5.00	880229
MR EDWIN P FILER	2029 SHERWOOD LN	PUEBLO, CO	81005	7195647252	7.00	880127
Minnie Findies	31133 COUNTY RD 101	Brush	CO 80723	3038424133	5.00	880127
RAYMOND FINNEY	1107 STEELE	DENVER CO	80206	3033336403	20.00	880309
RONALD & PEGGY FINNIA	P O BOX 77	BROOMFIELD	CO 80020	3034693940	10.00	880210
DEBORAH S FISHER	2777 GLENWOOD COURT #10	BOULDER, CO	80302	3034446612	10.00	880210
MRS DOYCE FISHER	RR 1 BOX 44	LIMON CO	80828	3037752735	5.00	880229
MAFIE M FISHER	4302 PERRY ST	DENVER, CO	80212	4334945	5.00	880113
MR BRIAN F FITZPATRICK	29571 FAIRWAY DR	EVERGREEN	CO 80439	3036747061	15.00	880210
MACK FORTENBERRY	2235 GRANBY WAY	AURORA CO	80014	3036806038	10.00	880113
MR FOSTER	PO BOX 1435	ALAMOSA	CO 81101	7195895239	25.00	880113
VELMA FOSTER	PO BOX 109	COLORADO CITY	CO 81019	7196763888	10.00	880113
THOMAS FOUCH	01836 S YANK PL	LAKWOOD	CO 80228	3039867695	25.00	880113
ANN E FOX	2330 S KEARNEY ST, 131	DENVER, CO	80222	3037573836	20.00	880113
LOREN FRANK	1468 ALINE	BOULDER	CO 80304	3034433517	20.00	880113
MR & MRS FRANKLIN	2217 ELM ST	DENVER, CO	80207	3033220432	15.00	880113
MIRA FREDERICK	560 LINDSAY RD	GOLDEN	CO 80401	3035261249	12.00	880210
Barbara Frederick	1375 High #401	Denver	CO 80218	3033227394	10.00	880113
MR ALAN C FREEMAN	151 S HUMBOLDT ST	DENVER	CO 80209	7335459	10.00	880113
MR HOWARD R FREEDY	13084 E 47TH AVE CL	DENVER, CO	80239	3033719447	25.00	880113
JOE FRENCH	720 PEARL ST	BOULDER	CO 80302	3036522867	15.00	880229
MR MARY FRENCH	4130 JALON	DENVER CO	80211	3034773446	7.00	880210

MARILEE M FREUND	1131 BRYAN ST	WESTMINSTER, CO	80030	3034271868	10 00	890113
MR DONATHAN I FREED	7165 W BAILLY AVE	LAKEWOOD, CO	80226	3039862144	25 00	880323
JOAN FRISCH	00690 10TH ST	BOULDER	CO 80302	3034435011	10 00	890113
BARBARA FRITTS	09312 D BRIARWOOD BLVD	ENGLEWOOD	CO 80112	3037719860	10 00	890113
MR JOSEPH A FRUTH	2530 KENWOOD DR	BOULDER, CO	80303	3034949011	10 00	890113
SARAH FUERTGES	41570 MOBILE CIRCLE	AURORA, CO	80013	3036807197	10 00	890113
M M MARVIN FUESZ	RTE 3 BOX 50	HAYDEN CO	80731	3037747290	60 00	890113
JAMES FUKAYE	10680 RIVERDALE RD	NORTH GLENN CO	80233	3034528208	50 00	880309
BILLY G JACQUELINE FUNK	6671 S CHEROKEE ST	LITTLETON, CO	80120	3037941462	15 00	880229
PATRICIA A FUNKHOUSER	1805 FAITH PL	LONGMONT, CO	80501	3037724180	15 00	880113
SHAUNDA K GAFFNEY	00219 FAIRWAY LN	GREELEY	CO 80634	3033309412	25 00	880113
MRS M GALBRAITH	11500 E 16TH AVE #10	AURORA CO	80010	3033408647	25 00	880210
MR HAROLD D GALE	3024 S ZURICH CT	DENVER	CO 80236	3039347880	10 00	880113
R DOLPH GALEGOS	11792 RD J	ANTONITO CO	81120	7193765694	25 00	880210
BRIAN GAMBLE	1165 LONGDON ST	LONGMONT	CO 80501	3037726051	15 00	880127
JANET B GANDENBEIN	39415 BOULDER CANYON DR	BOULDER	CO 80302	3034494936	25 00	880229
ALFREY GARCHAR	SOUTH HIGHWAY 666, RR BOX 417	DOVE CREEK	CO 81324	3036772825	10 00	880113
THE ERNEST GARCIA FAMILY	10038 DODGE DR	NORTHGLENN CO	80221	3034529992	10 00	880127
LOUISE GARCIA	628 DENVER BOX 414	SAGUACHE CO	81149	3036552236	15 00	880113
LETITIA A GARCIA	2606 KENDALL ST #205	EDGEWATER, CO	80214	3032325935	12 00	880127
JOSE GARCIA	6401 E 67TH AVE	ADAMS CITY	CO 80022	3032889556	3 00	880309
CLYDE GARDNER	RR 1 BOX 217	CALHAN CO	80808	3035412653	5 00	880210
MRS WILLIE GARNETT	1309 HARFORD RD	COLO SPRINGS CO	80906	7193923792	5 00	880323
MR JOE GARRETT	04630 S PENN	ENGLEWOOD	CO 80110	7813519	20 00	880127
EDNA GARRISON	08869 S MURPHY GULCH	LITTLETON	CO 80127	6974394	10 00	880127
DIANNE GARRISON	00120 PIERCE DR	COLO SPRINGS	CO 80906	7196339896	10 00	880229
BEATRICE A GASKIN	2585 NIAGARA ST	DENVER, CO	80207	3033226393	5 00	880113
KATHY GASKINS	15300 E 144TH AVE	BRIGHTON	CO 80501	3036593120	10 00	880127
JUDY A GAUGHAN	5405 W ONTARIO AVE	LITTLETON	CO 80123	9790533	20 00	880113
DAVE D GEER	409 BIRKETT DR	DURANGO, CO	81301	3032471719	15 00	880309
ROY G GELBHAUS	8170 KINGCROSS DRIVE	BOULDER	CO 80301	3033303681	25 00	880113
JAMES GELWICKS	00712 N SPRUCE	GUNNISON	CO 81230	6411101	15 00	880210
ROULIER GENEVIEVE JOY	4850 NIWOT RD	LONGMONT	CO 80501	3033305058	25 00	880210
KATHLEEN L GENOFF	9079 W 88TH CIR	WESTMINSTER, CO	80020	4224846	25 00	880229
JOEL GERK	121 E 4TH	CULESBURG CO	80737	3034743414	10 00	880113
MR LAZARO E GERSCHENSON	55 S ELM ST	DENVER, CO	80222	3033992743	20 00	880210
DOUGLAS & RUBY GIBBS	PO BOX #16	WIT CARSON CO	80825	7199623375	10 00	880127
MARY GIBSON	2753 S MACON ST	AURORA CO	80014	3037303985	25 00	880127
ANASTASIA GIDEROFF	00677 YORK	DENVER	CO 80206	3336027	10 00	880210
MABEL GILLAM	00312 DELTA	PAONIA	CO 81428	3035273079	7 00	880113
MR & MRS DALE GILLETTE	125 MANHATTAN DR	BOULDER, CO	80303	3034943842	10 00	880113
LINDA GILLOGLEY	633 PIONEER LANE	COLORADO SPRINGS	CO 80904	7194735247	12 00	880127
MR NICHOLAS GLASER	3919 W 4TH ST RD	GREELEY, CO	80634	3033333271	50 00	880113
ANNE GLAVAN	00003 MARGATE	PUEBLO	CO 81001	7195446794	25 00	880113
CAROL GLOWINSKY	914 SPRUCE ST 1	BOULDER	CO 80302	3034423954	12 00	880113
SAROU GOEL	9281 W PORTLAND AVE	LITTLETON CO	80123	3039732881	10 00	880229
Joyce Goglio	728 19th Street	Boulder	CO 80302	3034422065	10 00	880229
MR GARY W GOINS	4445 PERRY ST	DENVER	CO 80212	4334398	10 00	880309
JEAN H GOLDBERG	313 LOOKOUT VIEW CT	GOLDEN	CO 80401	3032780051	20 00	880113
JACQUELYN GOLDNER	3147 WESTWOOD CT	BOULDER	CO 80302	3034472931	10 00	880113
MARIAN L GOLDSMITH	7040 E GIRARD AVE, 403	DENVER, CO	80224	3037820446	25 00	880127
JOHN GOMEZ	1902 12TH ST	GREELEY CO	80631	3033534771	25 00	880309
CURTIS GOMEZ	2342 GRAPE ST	DENVER, CO	80207	3033335051	15 00	880113
RANITA L GOMEZ	1416 12TH ST	GREELEY, CO	80631	3560984	5 00	880210
Virginia T Gonzales	3130 W. Walsh	Denver	CO 80219	9345050	15 00	880113
ROSE ANN GONZALES	1390 S UTICA ST	DENVER	CO 80219	9344147	10 00	880210
SUSIE F GONZALEZ	115 W CEDAR AVE.	DENVER, CO	80223	3036981517	10 00	880113
MS MARY GOOD	PO BOX 23	NEW RAYMER CO	80742	3034375359	25 00	880113
PATSY D GOODMAN	650 S CORONA ST	DENVER, CO	80209	7778395	25 00	880113
SHEILA L GOODMAN	1484 MAYFIELD CR	LONGMONT, CO	80501	3037764053	10 00	880113

MARTIN GORCE	2007 COLUMBINE	BOULDER/	80302	3034478720	25.00	880113
MR STEPHEN D GORDON	1059 S YORK ST	DENVER, CO	80209	7338942	25.00	880113
ERICA J GOSMAN	7737 W 87TH DR	ARVADA CO	80005	3034208994	25.00	880113
NNICK GRADISAK	20 PINERIDGE COURT	PUEBLO CO	81001	7195462339	25.00	880113
MR RICKEY L GRAHAM	3005 S ROSLYN ST	DENVER, CO	80231	3037504745	20.00	880309
MARCELEE GRALAPP	3080 15TH ST	BOULDER CO	80302	3034433892	10.00	880113
MR ROBERT W GRAVELLE	1951 UPHAM ST APT 6	LAKEWOOD CO	80215	3032384757	15.00	880113
EDNA E GRAY	1001 CHARLOTTE ST	JOHNSTOWN, CO	80534	3035874579	50.00	880229
LUCILLE GREBENC	2586 S WINDONA CT	DENVER, CO	80219	3039354119	10.00	880113
DORIS C GREEN	1326 S LOGAN ST	DENVER, CO	80210	3037772834	15.00	880229
STEPHANIE W GREENBERG	2999 TINCUP CR	BOULDER, CO	80303	3034999383	15.00	880113
SUSAN GREENE	01006 W CHEYENNE RD	COLO SPRINGS CO	80906	7196320318	10.00	880113
MR JOHN GREENE	2685 S DAYTON WAY, 29B	DENVER, CO	80231	3036958350	40.00	880113
DON/ALICE GREENHALGE	2950 MCINTOSH DR	LONGMONT CO	80501	3037768841	10.00	880113
ARLENE N GREER	1835 17TH AVE	GREELEY CO	80631	3033533450	10.00	880113
WINIFRED E GRENFELL	3719 W 30TH AVE	DENVER, CO	80211	3034555413	25.00	880113
ELIZABETH GRENTS	1909 NORWOOD	BOULDER CO	80302	3034435611	10.00	880210
Orlando D Griego	2448 Irving St	Denver CO	80211	3034586430	15.00	880127
ELMA M GRIFFITH	1590 YATES ST	DENVER, CO	80204	3035344149	10.00	880210
CARMEN GRILLO	7123 S VALENTIA WAY	ENGLEWOOD CO	80112	3037794372	25.00	880113
NORMA B GROVERLAND	16 CANYON VIEW S L	BOULDER CO	80302	3034490304	15.00	880127
Suzanne Gruba	232 W 4th Ave	Denver CO	80223	3037772219	20.00	880127
MR JOE GRUBELNIK	RR 2 BOX 93	TRINIDAD CO	81082	7199414628	15.00	880229
ANNE JULIA GRUDA	339 S RALEIGH ST	DENVER CO	80219	9356396	10.00	880210
DONNA M GULLICKSON	2453 S DAHLIA LN	DENVER, CO	80222	3037575975	30.00	880210
MR BEN GURULE	955 LEE HILL DR (OSRD)	BOULDER, CO	80302	3034495878	60.00	880113
DOUGLAS GUSTIN	4642 SHAW BLVD	WESTMINSTER CO	80030	3034285581	17.00	880113
DOLORES GUTIERREZ	PO BOX 99B	TRINIDAD CO	81082	7198466615	10.00	880113
MR & MRS HACKER	00812 BUCKEYE	FT COLLINS CO	80524	3034840151	50.00	880113
MR STEPHEN A HAGEN	1330 S CORONA ST	DENVER CO	80210	7335427	25.00	880113
THEODORA A HAINES	LONG'S PEAK RT	ESTES PARK CO	80517	3035862575	10.00	880210
PAMELA R HAINES	1020 55TH ST	BOULDER, CO	80303	3034994234	10.00	880113
THELMA L HAIRSTON	2690 MONACO PY	DENVER, CO	80207	3033556924	10.00	880113
MARGARET S HALDANE	00586 SUNNY MEADOW LN	GRAND JCT CO	81503	2435747	10.00	880127
MR DANIEL C HALE	1225 KALMIA AVE	BOULDER, CO	80304	3034439368	50.00	880113
TOM HALLEY	3380 E 99TH WAY	THORNTON CO	80229	3034578212	12.00	880127
THERESA M HALSEY	4825 THUNDERBIRD CIRCLE #1B	BOULDER, CO	80303	3034948827	15.00	880113
LAURIE J HALVORSEN	2560 S RACE ST	DENVER, CO	80210	3038718534	25.00	880127
ANNE M HAM	2030 E 11TH AVE, 80B	DENVER, CO	80206	3033888103	10.00	880229
MS SHIRLEY D HAMILTON	12079 TECUMSEH TRL	CONIFER CO	80433	3038387772	12.00	880113
LAURA HAMILTON	2860 BELLAIRE ST	DENVER, CO	80207	3033776265	15.00	880309
MR STEPHEN H HAMILTON	11061 GRAY ST	BROOMFIELD CO	80020	4669355	25.00	880113
JULIE HAMMARSTROM	5204 FLAGSTAFF STAR ROUTE	BOULDER CO	80302	3034423074	20.00	880229
FRYLLIS A HAMMOND	00803 S LEE ST	LAKEWOOD CO	80226	3039855753	25.00	880229
LOUISE HANEY	00809 ELMIRA ST	AURORA CO	80010	3663156	20.00	880113
MR ORVILLE C HANSEN	10340 W GLENNON DR	LAKEWOOD, CO	80226	3039868223	10.00	880210
CLAUDE HANSEN	700 PONTIAC	DENVER CO	80220	3033330346	20.00	880113
MICHELINA D HANSON	5561 W GEDDES PL	LITTLETON, CO	80123	3039796224	10.00	880113
EDITH HARADA	4495 PERRY ST	DENVER CO	80212	4551791	10.00	880113
RUTH L HARDING	7203 W 67TH PL	ARVADA CO	80003	4201254	10.00	880113
LANAE HARDY	6484 FAIRWAYS DR	LONGMONT CO	80501	3034447304	30.00	880210
ROBERT HARFERT	609 CROWN RIDGE DRIVE	COLO SPRINGS CO	80904	7196331194	10.00	880309
SHARON HARMS	7780 W 38TH AVE, #103	WHEATRIDGE, CO	80033	3034672352	15.00	880323
BONNIE HARMS	3065 5TH ST	BOULDER CO	80304	3034437017	10.00	880127
ELIZABETH A HARMS	7371 W 74TH PL	ARVADA CO	80003	4310901	25.00	880113
ELIZABETH A HARMS	7371 W 74TH PL	ARVADA CO	80003	4310901	25.00	880127
Sesial Harris	3310 Elizabeth St.	Denver CO	80205	3778338	25.00	880127
MR & MRS HARRIS	436 PINE ST	BOULDER, CO	80302	3034430148	5.00	880113
PEARL E HARRISON	1401 ELMHURST DR, #403-W	LONGMONT, CO	80501	3037767884	30.00	880309
KATHI E HART	1275 HUDSON ST	DENVER, CO	80220	3033206144	5.00	880229

Name	Address	City	State	Zip	Phone	Rate	Number
MR JOHN M HARKINS	1628 E EASTER	LITTLETON	CO	80122	3037710666	20.00	880113
MR ALVIN D HALEKOST	734 S COPONA ST	DENVER, CO		80209	7770072	10.00	880229
PEGGY AND ED HAWKINS	4643 ZINNIA ST	ARVADA, CO		80004	3034229212	25.00	880113
CLIFFORD HAYCOCK	3163 B 1/2 RD	GRAND JUNCTION CO		81503	3034348401	20.00	880113
MR FREDERICK H HAYDT	2594 EATON ST	EDGEWATER, CO		80214	2379592	25.00	880210
Virginia Heddens	1636 S Holl;	Denver	CO	80237	3037565294	15.00	880309
BEATRICE B HEIMERL	2119 22ND ST	GREELEY	CO	80631	3522935	10.00	880113
BAROLD & CATHERINE HELGOTH	2435 HAWTHORN AV	BOULDER	CO	80302	3034423970	50.00	880113
Martha Henderson	2024 Clarkson, #801	Denver	CO	80205	3039615486	10.00	880309
GLORIA E HENDERSON	2600 MILWAUKEE ST	DENVER, CO		80205	3773770	5.00	880127
JEAN CRAWFORD HENREHAN	2400 KENWOOD DR	BOULDER	CO	80303	3034948261	30.00	880113
MR CARL H HENRIKSON	1188 SUGAR LOAF RD	BOULDER	CO	80302	3034443547	20.00	880309
CAROL J HENRY	2352 S WINONA CT	DENVER	CO	80219	9342845	12.00	880113
SUSAN HERALD	01836 14TH AVE	GREELEY	CO	80631	3033537663	15.00	880309
BERALDINE L HERBERGER	1900 E YALE AVE	DENVER, CO		80210	3037576848	10.00	880113
MIRACE HERNANDEZ	2120 MAPLETON AVE	BOULDER	CO	80302	3034436672	10.00	880113
LUCITA HERRERA	2018 W KIDWA ST	COLOR SPRINGS	CO	80904	7196324574	10.00	880210
STEVE HERRERA	5618 S FOREST HILL	LITTLETON CO		80120	3037989814	10.00	880113
SUSAN D HESTER	765 STEELE ST	DENVER, CO		80206	3033885120	25.00	880113
CORA L HETTINGER	1908 CLEARMONT	DENVER, CO		80220	3033938057	10.00	880113
LESTER HEWLEY	RR BOX 242	QVID	CO	80744	4635774	20.00	880127
ROSS/JOAN HIBLER	877 LINCOLN	BOULDER	CO	80302	3034424034	15.00	880127
RUBY J HICKMAN	6111 W PACIFIC CIR	LAKEWOOD, CO		80227	3039862020	25.00	880113
HAZEL M HICKS	3060 CLAYTON ST	DENVER, CO		80205	3033552141	10.00	880113
HARRIET W HILDEBRAND	9688 RENSSELAER DR	ARVADA, CO		80004	3034248593	5.00	880113
MRS ELDRID HILKEY	P O BOX 161	RANGELY	CO	81448	3036758358	10.00	880229
JAMES HILL	609 30 TROY ST	AURORA CO		80212	3033445784	20.00	880210
MR ALEXANDER HILL	714 PLACHY DR	ALAMOSA	CO	81101	7195899487	20.00	880309
Mable Hill	3850 Alcott	Denver	CO	80211	4559162	5.00	880113
GARY HILL	1805 TYLER AV	LONGMONT	CO	80301	3036510974	15.00	880229
DAVID HILLER	1675 CLERMONT ST	DENVER, CO		80220	3033994114	25.00	880113
JUDY H HINTON	4571 S MEMPHIS ST	AURORA, CO		80019	3036908454	15.00	880113
ROSE HIRSCH	1229 WILSHIRE AVE	GREELEY, CO		80631	3033522486	5.00	880113
MS MARY ANN HITCHCOCK	10495 W 62ND PL	ARVADA	CO	80004	4215826	12.00	880113
David L. Hlavac	784 So Ogden St	Denver	CO	80209	7448556	10.00	880113
WARREN & LOUISE HOBBS	29563 PAINT BRUSH DR	EVERGREEN CO		80439	3036743843	20.00	880309
AGNES HODGSON	1122 NO 15TH ST 306	CANON CITY CO		81212	3032751030	20.00	880210
MR PIETER HOEKSTRA	13325 WILLOW LN	GOLDEN	CO	80401	3032380955	25.00	880113
Margaret Hoffman	700 So Alton Way	Denver	CO	80231	3033436544	10.00	880113
MARIAN E HOFFMAN	335 UNIVERSITY BV	DENVER, CO		80206	3330063	15.00	880113
LINDA A HOFFMAN	1812 CANYON APT 38	BOULDER, CO		80303	3034447860	15.00	880229
LORRAINE E HOFFMANN	2168 BUENA VISTA DR	GREELEY, CO		80631	3301623	5.00	880113
GRETA/FRANK HOLDER	919 EMERSON	ROCKY FORD CO		81067	7192543403	15.00	880210
CATHIE HOLM	P O BOX 228	LYONS	CO	80540	3038235026	15.00	880210
ROY HOLMES	1504 WILLSHIRE DR	COLORADO SPRINGS	CO	80906	7193908686	25.00	880113
MR WALTER HOLT	506 E BASELINE	LAFAYETTE, CO		80026	6655330	15.00	880127
GEORGE HOMM	P.O. BOX 490	BURLINGTON CO		80807	7193467806	25.00	880229
VIVIAN L HOOKS	2600 GARFIELD ST	DENVER, CO		80205	3339484	18.00	880113
CECIL HORNBAKER	P O. BOX 315	NATURITA	CO	81422	3038652537	15.00	880210
MR STERLING HORNER	02625 21ST AVE	GREELEY	CO	80631	3033521178	25.00	880127
MR LEO R HERRIGAN	4930 MONTVIEW BV	DENVER, CO		80207	3033557361	15.00	880127
EMMET & JESSIE HOTT	BOX 362	IGNACIO CO		81137	3035634667	10.00	880127
MR CLIFFORD HOUSTON	3840 ARMER DR	BOULDER, CO		80303	3034947099	50.00	880309
RUTH A HOWARD	05211 S PENNSYLVANIA	LITTLETON	CO	80121	7892185	10.00	880113
MR ROBERT M HOWARD	435 OGDEN ST. 2	DENVER, CO		80218	3037220303	50.00	880113
Charles Howe	1340 King Avenue	Boulder	CO	80302	7034440079	25.00	880113
MARY C HOWE	2183 STONEHENGE CR	LAFAYETTE, CO		80026	3036655617	25.00	880113
ALICE HUGHES	1204 FAGIN DR	COLOR SPRGS CO		80915	7195970959	10.00	880210
MR & MRS WILLIE HULING	3134 MARION ST	DENVER, CO		80205	3032973478	10.00	880113
MARY A HULSE	3060 E BRIDGE ST, #382	BRIGHTON CO		80601	3036598857	25.00	880323

VIRGINIA HUNTER 5040 BLUE STEM DR
 EMMA S HUNTER 3533 W 23RD AVE
 MR KENTON C HUNTER 5984 S ELM CT
 EVELYN HUFF 00845 SAN BRUNO PL
 M/M G HURST 1909 HERCULES
 OREN AND ANNE HURST 1960 POPLAR ST
 MR THOMAS H HUTCHINSON 1112 LONG PEAK AVE
 JANICE F HUTCHINSON 8815 E EASTER CIR
 EMMA F ILLMAN 1912 EASTLAKE BLVD #308
 CAROLYN J IOAKIMEDFS 429 DEWEY
 MR JIM ISGAR 11190 COUNTY RD 141
 ELIZABETH IUPPA 01421 SAN JUAN
 ANITA D JACKSON 8075 W BTH AVE
 MINNIE L JACKSON 2680 MILWAUKEE ST
 MR DAVID V JACKSON 4945 S INDIAN TRL
 KAREN JAEGER 7330 FEBBLE CT
 ANNE M JANICH 2410 S LINCOLN ST
 NANCY JAROSEY 7571 S FRANKLIN ST
 COLLEEN JAYNE 371 LOGAN MILL RD
 MR ROBERT E JEFFREY 1415 TOEDTLI DR
 Ruth Jeffs 3034 S Columbine St
 JOHN & JANET JENDZEL 1743 31ST AVE
 JOHN & JANET JENDZEL 1743 31ST AVE
 PHYLLIS J JENSEN 00330 S MCINLEY AVE
 ANNIE R JIMENEZ 3376 W 37TH AVE
 NORA JOHLEP 16796 W 74TH PL
 MR HENRY JOHNS 445 COOK ST
 ELAINE JOHNSON 10662 LARSON DR
 BONNIE JOHNSON 524 OBSERVATORY DR
 THOMAS JOHNSON JR PO BOX 902
 GLADYS & HANS JOHNSON 3246 S NEWFORT ST
 GESTUR JOHNSON 1809 ELIM CT
 WILHELM JOHNSON 304 W MAIN
 CHARLES & ROSEMARY JOHNSON 80X 115
 MR & MRS LUTHER JOHNSON 3403 S Ivanhoe Way
 MARY JOHNSON 5442 ST VRAIN ROAD
 MR DANIEL K JOHNSON 3022 S WHEELING WAY #312
 THELMA A JOHNSON 9400 W 11TH AVE
 PEG JOHNSTON 05196 S WILLIAMS CIR
 JIM JONES 6030 LANE 12 N
 JOANNE JONES 00303 N 26TH ST
 JULY M JONES 2419 THOMAS AVE
 SARA S JONES 8945 W BETH DR
 WALTER JONES JR 2004 VALLEY FORGE AVE
 EDWARD JOSEPH 210 PINON
 MR DAVID G JOSEPH 250 BROOK ROAD
 ALAINE S JOSEPH 6371 E EASTMAN AVE
 MRS SELMA JULIAN 290 S BIRCH
 MR GLEN JUSTIS 1105 N MEADE AVE
 THELMA J KAASER 1663 STEELE ST APT 204
 PATRICIA A KAERGUIS 1671 S NEWTON ST
 MR & MRS KAEDING 2177 Meadows Ct
 Laurie Kagan 1475 S Quebec Way #11
 ELLEN KALAL 545 ARAPAHOE AVE
 TED S KALGPSKY 5089 MERRITT DR
 MR KALASC 3903 S OLIVE
 MR ANTHONY KALLEI 2929 6TH ST
 Irving Kaplan 773 So Ivy
 MR EDWARD C KAPLAN JR 1062 S WILLIAMS ST
 MR MICHAEL KAPLAN 1410 GRAND STREET D 110

COLD SPRINGS CO 77 80907 7195976736 10.00 880309
 DENVER, CO 80211 4774123 10.00 880127
 LITTLETON, CO 80121 3037791873 15.00 880323
 COLORADO SPGS CO 80906 7195765096 25.00 880113
 COLD SPRINGS CO 80906 7196341442 35.00 880113
 BOULDER, CO 80302 3034449134 25.00 880323
 LONGMONT, CO 80501 3037724921 15.00 880113
 ENGLEWOOD, CO 80112 3037715469 15.00 880229
 COLD SPRINGS CO 80910 7194730429 10.00 880210
 BOULDER, CO 80302 3034449631 10.00 880127
 HESPERUS CO 81326 3033854534 20.00 880210
 TRINIDAD CO 81082 7198467762 12.00 880113
 LAKEWOOD, CO 80215 2379095 20.00 880309
 DENVER, CO 80205 3033556156 20.00 880127
 EVERGREEN CO 80439 3036747049 25.00 880113
 LONGMONT CO 80501 3036522492 40.00 880113
 DENVER CO 80210 3037779796 15.00 880113
 LITTLETON CO 80122 3037980892 5.00 880113
 BOULDER CO 80302 3034427085 10.00 880113
 BOULDER, CO 80303 3034994865 35.00 880309
 Denver CO 80210 3037568417 25.00 880113
 GREELEY CO 80631 3033537129 25.00 880127
 GREELEY CO 80631 3033537129 25.00 880127
 FT LUPTON CO 80621 3038576764 10.00 880113
 DENVER, CO 80211 3034330648 12.00 880210
 GOLDEN CO 80403 3034242172 10.00 880127
 DENVER, CO 80206 3773868 25.00 880113
 DENVER CO 80233 3034522314 15.00 880229
 COLORADO SPRINGS, CO 80904 7196353060 30.00 880113
 CORTEZ CO 81321 3035653321 10.00 880113
 DENVER, CO 80224 3037575053 20.00 880127
 FORT COLLINS, CO 80524 3034827411 20.00 880127
 MONTROSE CO 81401 3032496892 20.00 880113
 COLORADO CITY, CO 81019 7196763755 35.00 880210
 Denver CO 80222 3036929257 10.00 880210
 LONGMONT CO 80501 3037722625 10.00 880113
 AURORA, CO 80014 3037558595 10.00 880113
 LAKEWOOD, CO 80215 2335493 12.00 880113
 LITTLETON CO 80121 3037616262 5.00 880113
 HOOVER CO 81136 3033782213 25.00 880210
 CO SPRINGS CO 80904 7196342152 25.00 880113
 DURANGO, CO 81301 3032479039 12.00 880113
 ARVADA CO 80005 4254131 50.00 880113
 FT COLLINS CO 80526 3034936548 35.00 880113
 WALSENBURG CO 81089 7197382215 5.00 880323
 BOULDER, CO 80302 3034421952 25.00 880113
 DENVER, CO 80222 3037530849 10.00 880229
 DENVER CO 80222 3033881213 25.00 880309
 COL SPRINGS CO 80909 7196344519 25.00 880127
 DENVER, CO 80206 3033337987 10.00 880113
 DENVER CO 80219 9227414 10.00 880127
 Grand Jct CO 81503 3032418155 10.00 880210
 Denver CO 80231 7552286 5.00 880113
 BOULDER CO 80302 3034424774 25.00 880210
 BOULDER CO 80303 3034447760 20.00 880323
 DENVER CO 80207 3037594281 25.00 880323
 BOULDER, CO 80302 3034437278 20.00 880113
 Denver CO 80224 3553283 5.00 880113
 DENVER, CO 80209 3037334279 12.00 880113
 DENVER CO 80205 3033286727 75.00 880210

ELLY KATHEINE	855 14TH STREET	BOULDER	80303	3034499484	17.00	880229
EVILE M KAWMURA	2915 S JUSTER ST	DENVER, CO	80231	6950796	10.00	880229
SHILLIE B BAY	3215 9TH ST	BOULDER, CO	80302	3034432273	10.00	880127
BONNIE M KAZEMI	67446 S JACKSON CT	LITTLETON	CO 80122	7713024	20.00	880127
MR JOHN KEABLES	2964 S AKRON ST	DENVER CO	80231	3037558627	20.00	880113
MR JAMES E KEEFE	208 SCRANTON ST	AURORA, CO	80011	3441707	10.00	880113
WILLIE S KEIFER	2532 S STUART ST	DENVER	CO 80219	3039344529	15.00	880113
WALTER M KENNEDY	2084 VAUGHN	AURORA	CO 80011	3434900	15.00	880113
FRIDIE KOLLEY	P O BOX 214	CAMP DENALE CO	81623	3039632810	10.00	880113
MARY KOLLEY	62393 W WARREN	ENGLEWOOD	CO 80110	9353252	10.00	880113
JOANITA KELLY	1317 N EL PASO	GOLD SPRINGS CO	80907	7196335906	5.00	880113
EUSTELLE M KENNEDY	7905 MELROSE DR	WHEATRIDGE, CO	80033	3034221958	15.00	880113
MARGARET E KENNEDY	P O BOX 4156	GRAND JUNCTION, CO	81502	3032422899	10.00	880309
LEOTA KENNEDY	P O BOX 70	WINDSOR, CO	80550	3036862507	10.00	880113
BERTHY J KENNISON	179 BEKKER DR	GOLDEN	CO 80401	3035260596	12.00	880210
GEORGE KENOUGH	7090 OSCEOLA	WESTMINSTER	CO 80030	3034290977	25.00	880113
THEODOSIA KERN	1421 E BARTMOUTH AVE	ENGLEWOOD CO	80110	3037814225	20.00	880113
VERA KESTER	1419 E BIRCH	GOLD SPRINGS CO	80709	7196320280	15.00	880229
ELIZABETH KESTER	62134 S MILWAUKEE	DENVER	CO 80210	7564857	50.00	880113
MARY KETTLE	4654 W ROWLAND CIR	LITTLETON	CO 80123	3039797420	15.00	880113
MR DAVID B KIKER	5030 S CLINTON ST	ENGLEWOOD, CO	80111	7713111	50.00	880210
MARCELLE M KILANCKI	799 KENOPHON ST	GOLDEN, CO	80401	3032385451	10.00	880113
EDWARD KIMBALL	01130 JUDSON DR	BOULDER	CO 80303	3034941713	25.00	880113
BETTY KIMBLE	3425 JACKSON	DENVER CO	80205	3033774571	5.00	880113
CLARA KING	108 ZUNI	SECURITY	CO 80911	3033908937	5.00	880113
GELA B KING	PO BOX 175	BUFFALO CREEK	CO 80425	3038387714	25.00	880113
MR ROBERT G KING	10774 MACE DONIA ST	LONGMONT, CO	80501	3036787945	25.00	880113
HELEN M KING	929 S DALE CT	DENVER, CO	80219	3039357183	10.00	880113
ELEANOR B KING	P O BOX 355	LA SALLE, CO	80645	3032846567	5.00	880113
MR ROBERT C KINPAID	10597 W 107TH AVE	BROOMFIELD	CO 80020	4666734	7.00	880127
MR R W KINNISON	10955 COUNTY RD 27	DAVID CO	80744	3034635394	10.00	880113
BOBRITA KINSEY	6555 WARD RD	ARVADA CO	80004	3034290348	10.00	880127
MARY KIRBY	04716 REGENCY DR	FT COLLINS	CO 80526	3032260346	50.00	880113
MR C KIRK	07425 W 33RD AVE	WHEATRIDGE	CO 80033	2332089	15.00	880210
MAM CHARLE KIRKBRIDE	316 ARGUS DR	GOLD SPRGS CO	80906	7196333609	40.00	880113
ANN E KLAIMAN	457 S PEARL ST	DENVER	CO 80209	7780943	35.00	880127
MR GARY KLINE	PO BOX 1144	STEAMBOAT SPRG	CO 80477	3038791265	10.00	880127
CLAUDIA J KNIFFIN	7471 S FOREST CT	LITTLETON, CO	80122	7414465	10.00	880113
CLAUDIA J KNIFFIN	7471 S FOREST CT	LITTLETON, CO	80122	7414465	10.00	880210
MR & MRS KOJANCIC	PO BOX 591	PAGNIA CO	81428	3035273168	25.00	880113
KATHRYN M KOEHLER	3172 E WEAVER AVE	LITTLETON, CO	80121	7940326	25.00	880229
MARGARET KOLOMITZ	515 EDISON AVE	LAJUNTA CO	81050	7193842372	25.00	880113
THEODORE KOOMANOFF	1719 SHERIDAN RD	PUEBLO CO	81001	7195450178	25.00	880309
HALLIE J KOPPEL	19020 E GRAND AVE	ENGLEWOOD, CO	80111	3037708432	5.00	880127
MR ZENTA KORDONS	01137 GRAND AVE	GRAND JUNCTION	CO 81501	3032452865	7.00	880229
BILL KORN	2171 WOODLAND RD	LONGMONT CO	80501	3037721320	15.00	880113
BONNIE J KOSSOFF	2 ASH ST	DENVER, CO	80220	3033216958	15.00	880113
PHYLLIS KOTLAR	301 ARGYLE AVE	PUEBLO, CO	81004	7195434242	10.00	880229
SANDRA S KOUNALIS	7184 S DAYTON ST	DENVER, CO	80231	3037906577	20.00	880113
SHRILA KOWAL	5343 S STEELE	LITTLETON CO	80121	3037716829	15.00	880113
ARLENE KRAMER	4209 W EISENHOWER	LOVELAND	CO 80537	3036672558	10.00	880113
MR EDWARD KRANZ JR	1808 RATON	LA JUNTA CO	81050	7193847273	15.00	880210
GLENN KRAY	2045 FAIRFAX	DENVER CO	80207	3033772806	25.00	880323
MR KRENZ	10107 GOLD HILL	BOULDER	CO 80302	3034428492	10.00	880127
DOROTHY KRIMM	02407 MARLBOROUGH RD	COLORADO SPGS	CO 80909	7196326933	10.00	880113
Karen Krueger	378 8th	Burlington	CO 80807	7193467142	20.00	880309
EUNICE M KRUEGER	4580 FLOWER ST	WHEAT RIDGE	CO 80033	4211300	25.00	880113
JENNIE KRUML	60 CORONA ST	DENVER, CO	80218	7223722	5.00	880127
ELIZABETH KUDALIS	04320 S KALAMATH ST	ENGLEWOOD	CO 80110	7893844	20.00	880229
CAROL KUHN	02432 E ORMAN	PUEBLO	CO 81004	7195611045	10.00	880113

SONA J KUPP	10350 E JEWELL AVE #B54	DENVER, CO	80231	3037501823	10 00	880309
MR NORMAN KURTZ	1500 S ELIZABETH	DENVER CO	80210	3037331810	20 00	880113
MICHAEL KURTZ	1900 HUDSON ST	DENVER	CO 80220	3033222983	25 00	880229
DR JOSEPH KURTZ	890 KALMIA	BOULDER CO	80302	3034441284	25 00	880113
PATRICIA A KUYKENDALL	649 KAYENTA DR	GRAND JCT	CO 81503	3032431219	7 00	880113
REBECCA S LABSON	2195 SIMMS PL	LAKEWOOD, CO	80215	3032386796	7 00	880113
MR DAVID C LACE	29551 FAIRWAY DR	EVERGREEN	CO 80439	3036746093	25 00	880113
MS SUSAN LACH	1525 QUAIL HOLLOW DR	FORT COLLINS CO	80525	3032234218	10 00	880113
MR SCOTT B LADWIG	10150 E VIRGINIA ST , #4-103	DENVER, CO	80231	3033679402	10 00	880127
BONITA L LAHEY	1438 NIAGARA ST	DENVER, CO	80220	3218533	25 00	880113
MRS DAVID LAMB	1431 BLUEBELL AVE	BOULDER, CO	80302	3034430166	25 00	880113
ELIZABETH E LAMP	2109 HOYT ST	LAKEWOOD	CO 80215	2334867	10 00	880113
Sally Rae Lambert	P O BOX 156	CLIFFTON CO	81520	3034344876	20 00	880309
E E LANE JR	RR2, IGNACIO	ALLISON CO	81137	3038832341	25 00	880309
LUCILLE F LANGDON	3570 MILLER ST	WHEATRIDGE, CO	80033	4243303	20 00	880127
GEORGE LANGER	4495 MOORHEAD AVENUE	BOULDER	CO 80303	3034947625	20 00	880210
CHARLEEN D LANGHOFFER	588 S GRANT ST	DENVER, CO	80209	7224848	15 00	880113
K G LANGTON	07205 S DEXTER ST	LITTLETON	CO 80122	3037795284	12 00	880210
BEVERLY LARSON	PO BOX 331	CREEDE	CO 81130	3036582375	15 00	880210
Louise Larson	8555 Fairmount Dr B-107	Denver	CO 80231	3033991315	30 00	880113
ROBERT LARSON	3556 S HILLCREST DR , #C-10	DENVER	CO 80237	3037820737	8 00	880113
NANCY E LARSON	4224 E 126TH AVE	THORNTON, CO	80241	3034570546	25 00	880113
MR JONATHAN N LARSON	8 JUNEAU PL	LONGMONT, CO	80501	3037729630	10 00	880210
PATRICIA LAVERTY	8215 W 90TH PL	WESTMINSTER	CO 80020	4250425	12 00	880210
NANCY P LAVERTY	3841 PASEO DEL PRADO	BOULDER, CO	80301	3034422511	10 00	880127
MR GEORGE H LAWRENCE	4755 MCKINLEY DR	BOULDER, CO	80303	3034440118	25 00	880210
DANNA LAWSON	3730 S HARLAN ST	DENVER	CO 80235	3039862216	12 00	880210
MR DAVID R LAY	785 S DALE CT	DENVER	CO 80219	3039340678	20 00	880113
VICTORIA LAZICKI	150 MONROE ST	DENVER, CO	80206	3033881506	10 00	880113
DIANA LEA	4424 DRIFTWOOD PL	BOULDER	CO 80301	3035301332	5 00	880127
RICHARD LEEBOWITZ	4662 E WEAVER	LITTLETON CO	80121	3037795664	10 00	880113
LAWRENCE LECHMAN	CO RD 32	SEDGWICK CO	80749	3034635771	10 00	880113
TOM LEDGERWOOD	1254 DOWNING ST	DENVER, CO	80218	3038610880	25 00	880229
ABELINE LEDORA	18901 E 136TH AVE	BRIGHTON, CO	80601	3036590616	7 00	880113
JUDY LEE	13324 E DARTMOUTH AVE	AURORA CO	80012	3033669586	10 00	880210
PETTY J LEE	1741 27TH AVE	GREELEY, CO	80631	3532366	15 00	880113
PHIL LEGGITT	BOX 313	CREEDE CO	81130	3036582432	10 00	880127
DEBRAH LEIBOWITZ	1250 OLYMPIA CIRCLE	LAFAYETTE	CO 80026	6654321	10 00	880229
HAROLD LEINBACH	2015 KOHLER DR	BOULDER, CO	80303	3034949111	20 00	880113
MR RICHARD A LEIPER	13421 W 25TH AVE	GOLDEN, CO	80401	3032799816	7 00	880127
JAMES LEMBKE	5379 BALSAM #103-A	ARVADA	CA 80003	3034285842	25 00	880309
MR PETER LEMONE	2048 BALSAM DR	BOULDER CO	80302	3034494754	25 00	880127
HAROLD M LENIHAN	2805 S FAIRFAY ST	DENVER, CO	80222	7561486	5 00	880210
MR HELEN LERCHEN	2323 W 38TH	DENVER CO	80211	3034552234	10 00	880113
Scott Levin	6312 S FLORENCE WAY	INGLEWOOD	CA 80111	3037407232	5 00	880113
ELLEN M LEVINE	180 S DAHLIA ST	DENVER, CO	80222	3211786	10 00	880323
PAMELA LEVY	1790 LOCUST ST	DENVER, CO	80220	3033229572	25 00	880113
PATRICIA A LEWIS	124 PARIS CIP	AURORA, CO	80011	3660442	7 00	880113
MARY LEWIS	605 COOK DR	FT COLLINS CO	80521	3034828930	75 00	880210
MARTHA E LEWIS	P O BOX 133	BOULDER, CO	80306	3034422751	20 00	880127
LISA J LEWIS	14457 W 32ND AVE	GOLDEN	CO 80401	3032798101	5 00	880113
MARY ROSE IBARRA	6500 LEYDEN ST	COMMERCE CITY	CO 80022	2876686	5 00	880113
JUAN LIZDELL	3945 S WILLOW WAY	DENVER CO	80237	3037719126	10 00	880113
BONNIE J LIDOLF	2421 W 14TH ST	GREELEY	CO 80631	3033563427	20 00	880127
JULIA LILLEY	14901 N HERON	BROOMFIELD CO	80020	3034527002	30 00	880113
ELIZABETH Y LINDEMAN	1670 GLEN AYSR DR	LAKEWOOD, CO	80215	3032375348	25 00	880113
CHARLOTTE LING	11560 HOLLY ST , RT 2	NORTH GLENN	CO 80233	3034517096	15 00	880127
MR THOMAS J LISCHWE	1417 JERSEY ST	DENVER, CO	80229	3554259	10 00	880113
JOE LISTER	PO BOX 711	PAGOSA SPRINGS	CO 81127	3032642196	12 00	880127
MR BENJAMIN LITOFF	3125 W FLORISS AVE F106	ENGLEWOOD, CO	80110	3037893021	25 00	880309

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ANN J LOCKHART	8382 EMPORIA ST	DENVER, CO	80207	3886978	25.00	880113
MRS MARJORIE W LOED	65520 E MISSISSIPPI 1	DENVER	CO 80224	7574536	25.00	880113
ROBERT LOEWE	PO BOX W	DIVIDE	CO 80814	3036873249	7.00	880127
JOANNE LOGAR	13302 E DAKOTA AVE	AURORA, CO	80012	3033660859	20.00	880113
MR HOWARD G LOLOFF	1704 15TH AVE	GREELEY	CO 80631	3523767	15.00	880113
JACQUELINE A LONG	4512 ABILENE ST	DENVER, CO	80239	3033730107	10.00	880127
LAYONA J LONG	6463 S WILLIAMS ST	LITTLETON, CO	80121	3037945741	75.00	880113
Toby Lopez	3440 Zuni	Denver	CO 80211	4559349	10.00	880127
ELOY/SALOME LOPEZ	5380 E 67TH AVE	COMMERCE CITY CO	80022	3032878337	12.00	880210
JESSIE & JOE LOPEZ	7210 W 65TH AVE	DENVER	CO 80221	3034281710	5.00	880309
MR FELIX LOPEZ	175 S DOWNING ST	DENVER	CO 80209	7335297	50.00	880113
MR HENRY J LUSTROH	1427 11TH AVE	LONGMONT, CO	80501	3037760320	15.00	880113
MARY J LOVE	730 W 47TH ST	LOVELAND, CO	80538	3036632598	10.00	880113
GRACE E LOUVISOME	6266 ELATI ST	LITTLETON, CO	80120	3037981674	5.00	880127
MARK LUWENSTEIN	365 ONEIDA ST	BOULDER	CO 80303	3034942112	25.00	880113
DANIEL LOWMAN	03337 S EMPORIA CT	DENVER	CO 80231	7552210	15.00	880113
KATHLYN R LUCERO	4475 W EXPOSITION AVE	DENVER	CO 80219	3039356373	12.00	880127
RUTH E LUDWIG	1529 SPENCER ST	LONGMONT, CO	80501	3037764263	10.00	880113
GARY LUKE	926 GLEANDER DR	LOVELAND CO	80538	3036674817	25.00	880113
ARNO H LUKER	02231 27TH AVE	GREELEY	CO 80631	3305370	20.00	880113
ADELINE EV LUTZ	1815 S LINDEN WAY	DENVER, CO	80224	7562374	25.00	880323
Mamie Lynch	P. O. Box 672	Pagosa Springs	CO 81147	3032645542	25.00	880127
BONNIE & JOHN LYNCH	1220 LINCOLN	LONGMONT	CO 80501	3037765353	25.00	880127
MARY H LYNCH	2276 E MINERAL AVE	LITTLETON, CO	80122	3037980770	5.00	880229
Mary Ann Lynen	3650 W 26th Ave	Denver	CO 80211	4776093	10.00	880113
THOMAS LYONS	00930 WAITE	BOULDER	CO 80303	3034992170	10.00	880210
SUSAN E MAC LEOD	13815 W 66TH WAY	ARVADA, CO	80004	3034219041	15.00	880127
DOROTHY L MACHART	465 S FULTON AVE	FT LUPTON, CO	80621	8574983	5.00	880113
MARGARET MALDONADO	RIO STAR RT BOX 269	WALSENBURG CO	81089	7197382861	5.00	880309
BILL MAGUIRE	136 W 13TH ST BOX 13	SILVERTON CO	81433	3033875513	5.00	880127
MR TOM J MAIER	871 ELM ST	DENVER, CO	80220	3033991143	10.00	880113
LYNN E MALKINSON	1195 DAKDALE PL	BOULDER, CO	80302	3034400718	10.00	880127
Ruth Malman	220 Dexter	Denver	CO 80220	3331400	50.00	880229
ADRIENE MALONE	01515 HIMEBAUGH	LAJUNTA	CO 81050	7193849100	10.00	880127
MR PATRICK F MALONE	5237 S JOSEPHINE WAY	LITTLETON, CO	80121	3037981398	12.00	880210
NANCY K MALVILLE	220 MANHATTAN DR	BOULDER, CO	80303	3034996303	25.00	880113
ANNA M MANCUSO	517 W MAIN ST	GRAND JCT, CO	81505	3032426824	5.00	880113
Asha Mangalik	139 HOLLY ST	Denver	CO 80220	3033216438	20.00	880229
MR RALPH MANN	02914 16TH ST	BOULDER	CO 80304	3034435435	15.00	880113
MR WILFRED R MANN	780 GRAPE AVE	BOULDER, CO	80302	3034431421	25.00	880229
Jeffrey F. Manning	1004 M Street	Penrose	CO 81240	3033726645	25.00	880113
LAWRENCE MARI	1715 LASHLEY	LONGMONT	CO 80501	3037761271	5.00	880309
COLLEEN F MARION	1245 S YORK ST	DENVER, CO	80210	3037772346	25.00	880210
NANCY MARKUSSON	7544 NATIVE DANCER	EVERGREEN CO	80439	3036740764	20.00	880210
JOANNE MARLATT	760 LINCOLN	BOULDER CO	80302	3034439655	12.00	880113
JEAN MARLER	01760 S TEJON	DENVER	CO 80223	9353915	15.00	880113
RUBY MARR	355 NORTON	BOULDER CO	80303	3034948812	10.00	880113
DON MARSH	12411 MARIA CR	BROOMFIELD	CO 80020	4697282	10.00	880113
COLLEEN K MARSH	8384 W. ILISS AVE.	LAKEWOOD, CO	80227	3039860939	10.00	880229
MR. C. J. MARSH	3160 S FEDERAL BV	DENVER	CO 80236	3037812580	10.00	880113
LAVERGNE MARSHALL	7347 GRION ST	GOLDEN, CO	80403	3034249487	5.00	880113
FRANK LAUER/CAROL MARTIN	203 BRENTWOOD	PUEBLO CO	81005	7195641274	20.00	880323
MR. DAVID MARTIN	5360 W ROWLAND AVE	LITTLETON, CO	80123	3039794595	15.00	880229
MR EDWARD P MARTIN	240 S IVY ST	DENVER, CO	80224	3033226222	25.00	880113
ROBERTA R MARTIN	7882 OWENS ST	ARVADA	CO 80005	4247882	20.00	880113
JOSEPHINE MARTINEZ	622 MOUNTAIN AVE	COLORADO SPRINGS, CO	80905	7194751369	12.00	880113
Don Martinez	199 VRAIN ST	Denver	CO 80219	9361207	15.00	880229
Gary Martinez	Box 1501	Breck	CO 80424	3034536212	20.00	880127
MR FRANK JR MARTINEZ	2821 S IDALIA ST	AURORA, CO	80013	3036933726	10.00	880127
MR ROGER MARTINEZ	1705 S VALLEJO ST	DENVER	CO 80223	3039360600	30.00	880113

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Carolyn L. Masters	2857 Texas Ave	Grand Junction	CO	81501	3032450901	12.00	880113
LOIS M MATHESON	4081 S ASPEN LANE	EVERGREEN, CO		80439	3036742890	50.00	880323
DIANA J MATSUMOTO	412 S VICTOR WAY	AURORA, CO		80012	3436422	5.00	880127
MR HARRY MATSUSHIMA	22505 WELD CO RD, 33	LA SALLE, CO		80645	3032846429	20.00	880127
DAVID AND LINDA MATTHEWS	1000 S CORONA ST	DENVER, CO		80209	7227157	10.00	880113
MARY A MATZ	4687 INGRAM CT	BOULDER, CO		80303	3034947755	10.00	880229
BARBARA MAXIF	01046 A JOSEPHINE	DENVER, CO		80206	3337285	15.00	880210
IMOGENE MAY	3000 HUDSON	DENVER CO		80207	3033950022	35.00	880113
BROUN H/MELBA MAYALL	2403 CONSTELLATION DR	COLD SPRINGS CO		80906	7196337558	25.00	880210
John C Mayer	PO Box 841	Buena Vista	CO	81211	3033956870	50.00	880113
VIRGINIA A MAYS	13665 W 51ST PL	ARVADA	CO	80002	3034211778	10.00	880113
MILDRED P MC CARI	6029 S WINDERMERE ST	LITTLETON, CO		80120	3037940684	15.00	880113
PURNEE A MC COURT	2125 STONECROP WAY	GOLDEN, CO		80401	3035269537	25.00	880113
ESTELLE S MC KEE	1413 W LAKE CT	LITTLETON, CO		80120	7943039	40.00	880113
VIRGINIA R MC NEILL	6703 RALSTON RD	ARVADA, CO		80002	3034242786	30.00	880210
BARBARA A MCCARL	1294 S VINE ST	DENVER, CO		80210	6980327	5.00	880127
BERNICE L MCCLARAN	1140 S WOLFF ST	DENVER	CO	80219	9363594	12.00	880127
PATRICIA MCCLEARN	444 CHERRY	DENVER CO		80220	3033221900	25.00	880210
DON MCCLURE	420 COTTONWOOD	EATON CO		80615	3034542613	10.00	880229
J SCOTT MCCOMAS	460 ARAPAHOE	BOULDER	CO	80302	3034472756	25.00	880127
SHARON MCCORMICK	05989 ELDRIDGE CT	ARVADA	CO	80004	4220932	18.00	880309
RICHARD MCCRAY	1900 BASELINE RD	BOULDER	CO	80302	3034442524	35.00	880127
JAMES MCCREER	01293 IRONTON	AURORA	CO	80010	3642118	5.00	880127
PAT MCDERMOTT	7681 RALEIGH	WESTMINSTER CO		80030	3034282814	7.00	880113
CHARLIE McDONALD	00057 LEVIS RD	GREELEY	CO	80631	3033569066	15.00	880127
HARRY & CAPLA McDONALD	1717 NEWARK	AURORA CO		80010	3033443775	40.00	880229
SARAH McDOWELL	2075 Forest	Denver	CO	80207	3033991354	8.00	880113
MS. JAN MCGEE	P O BOX 784	Brush	CO	80723	3038425461	10.00	880309
MR ROBERT D MCGINLEY	1567 S MARION ST	DENVER	CO	80210	3037442100	12.00	880113
Timothy Shawn McGrath	805 Llewellyn E Thompson Eiv	Las Animas	CO	81054	7194561122	25.00	880210
MR FLOYD C MCINTIRE	7780 E CORNELL AVE	DENVER, CO		80231	7557594	10.00	880210
MS PEGGY MCINTOSH	12430 E KANSAS PL	AURORA CO		80012	3037513421	35.00	880323
John McMillin	1917 W 32nd Ave	Denver	CO	80211	4586355	10.00	880309
MAHLY MCNEILL	2106 WOOD AVE	COLORADO SPRINGS, CO		80907	7195781071	10.00	880210
JOHN MCNEILL	2249 DUVOIN	MONTROSE	CO	81401	3032499891	25.00	880113
MR JOHN P MCQUADE	4575 TEJON ST	DENVER, CO		80211	4554513	10.00	880113
D S MEDINA	8020 GROVE ST	WESTMINSTER	CO	80030	3034289605	50.00	880323
ED MEIER	P O BOX 219	OVID	CO	80744	3034635375	20.00	880127
MARY MEINEKE	00440 PENNSYLVANIA	DENVER	CO	80203	3037226168	10.00	880127
ANTHONY MELONAKIS	7460-B COAL MINE AVE	LITTLETON	CO	80123	3039728509	25.00	880113
MR BILL MENDEL	01410 OSGOOD	COLD SPRINGS	CO	80915	7195961999	10.00	880210
IRENE M MERCIER	3401 S MARION, APT 105	ENGLEWOOD, CO		80110	3037619466	10.00	880309
MR MARK MEREDITH	382 HOLLYBERRY LN	BOULDER, CO		80303	3034940042	12.50	880309
GENEVRA METCALF	340 32ND ST	BOULDER	CO	80303	3034942785	20.00	880113
MR METCALFE	1112 COTTONWOOD ST	BROOMFIELD, CO		80020	3034693994	10.00	880113
MARGARET METZGER	01730 MEADE ST	DENVER	CO	80204	5347021	15.00	880113
Norman Meyer	27414 Rd #40	Bethune	CO	80805	3033467369	10.00	880113
PATRICIA A MEYER	24858 RED CLOUD DR	CONIFER	CO	80435	3038385350	10.00	880113
WELCOME A MEZO	2140 WILLOW LN	LAKEWOOD, CO		80215	2320060	10.00	880113
MR JOHN MIDDLETON	2385 PANORAMA AVE	BOULDER CO		80302	3034441757	25.00	880113
MARY MIKLICH	1800 MAIN ST, 21B	GRAND JCT, CO		81501	3032452525	10.00	880323
RAYMOND C MILLS	3615 BROADWAY	BOULDER	CO	80302	3034427352	20.00	880210
JANICE MILLER	01965 HUDSON ST	DENVER	CO	80220	3033992845	30.00	880113
RALPH MILLER	73 ILLINOIS AVE	SALIDA CO		81201	3035396495	15.00	880210
MICKEY MILLER	1912 E LAKE BL APT 1001	COLD SPRINGS CO		80910	7194732526	10.00	880309
GERDA MILLER	727 BUENA VENTURA DR	FOUNTAIN CO		80817	3033627488	7.00	880229
Lewis Miller	338 S Redlands Rd	Grand Jct	CO	81502	3032430918	25.00	880309
MR CHARLES MILLER	1375 TOEDTLER DR	BOULDER	CO	80303	3034995099	25.00	880113
OPAL A MILLER	11682 SHERMAN ST	NORTHCLENN, CO		80233	3034573438	50.00	880127
MR CHRISTOPHE MILLER	1205 CLARKSON ST	DENVER, CO		80219	3038282539	15.00	880229

MR WILLIAM V MILLER	126 SOUTH 5TH	WAGELY, CO	81648	3036758603	5.00	880113
MR R DOLPH V JR MILLS	6655 TELLER ST	ARVADA, CO	80003	3034214132	10.00	880113
PATRICIA D MINEA	57 SANDY DRIVE	BOULDER	CO 80302	3034442471	25.00	880113
CHARLES P BONITA MINOR	4900 NEWTON ST	DENVER, CO	80221	3034551771	35.00	880127
EVELYN M MITCHELL	2874 HARTWICK CR	LONGMONT, CO	80501	3037720566	15.00	880113
MR DAVID T MITZNER	1960 LOCUST ST	DENVER, CO	80220	3888461	15.00	880229
NADA E MOHR	P O BOX 303	NEW CASTLE, CO	81547	3039842135	10.00	880210
MS MILDRED MOIST	RD 29 BOX 15	OIDV CO	80744	3034635536	10.00	880113
CATHERINE P MOLLECK	1221 8TH ST	GOLDEN	CO 80401	3032797045	50.00	880113
ROMAN MONDRAGON	PO BOX 436	SAN LUIS	CO 81152	3036723325	10.00	880229
M M LILIAS MONDRAGON	621 W KANSAS	TRINIDAD CO	81082	7198462745	5.00	880127
MR NEMECIO MONDRAGON	310 W CLEVELAND ST	LAFAYETTE, CO	80026	3036655160	25.00	880113
CLAIRE MONTOUR	1675 S WOLCOTT CT	DENVER	CO 80219	9345305	10.00	880229
BARB MONTOYA	PO BOX 31	RED CLIFF	CO 81649	8275349	10.00	880113
MR SAUL M MONTOYA	492 S 14TH AVE	BRIGHTON, CO	80601	6595893	25.00	880309
CHARLES MOONE	1901 SPRUCE	BOULDER	CO 80302	3034426626	30.00	880113
MRS MOORE	NADA CT #9	FT MORGAN	CO 80701	8672580	10.00	880229
FRANK J MOORE	425 W 10TH ST	LOVELAND CO	80537	3036677043	15.00	880113
LILLIAN S MOORE	636 HORIZON, #301	GRAND JCT	CO 81506	3032453944	10.00	880113
MR DONALD E MOORE	P O BOX 280348	LAKEWOOD, CO	80228	3036701514	20.00	880113
MR BILLIE L MOORE	2973 OXBOW RD	GRAND JCT, CO	81504	3032490070	5.00	880127
CATHERINE C MOORE	4941 GARRISON ST 105	WHEATRIDGE CO	80033	3034211189	25.00	880113
JESSE T MOORES	02110 MONTEAGLE ST	COLOR SPRINGS	CO 80909	7194731491	15.00	880113
Jean Moores	Star Rt 4	Gateway	CO 81522	9312802	7.00	880113
CURINA MORA	P O BOX 218	PLATTEVILLE, CO	80651	3037852815	7.00	880323
ANGEL L MORALES	6235 W 47TH PLACE	WHEAT RIDGE, CO	80033	3034311842	10.00	880323
MR THOMAS E MORAN	1306 E SHOREWOOD DR	GRAND JCT	CO 81503	3032439745	10.00	880113
KAREN MOREHEAD	1885 S QUEBEC WAY, #A-14	DENVER	CO 80231	3033688147	10.00	880113
MR JOHN R MOREY	4439 BRYANT ST	DENVER, CO	80211	4331860	35.00	880229
LENORE MORGAN	4600 E KENTUCKY AVE, 401	DENVER, CO	80222	6912330	25.00	880113
MORA E MORGENSTERN	2239 KRAMERIA ST	DENVER, CO	80207	3773137	50.00	880210
MR J S MORRIS	02600 MEINING	BERTHOUD	CO 80513	3035322929	15.00	880210
LLOYD MORRIS	1416 MT ELBERT	LEADVILLE CO	80461	3034860672	20.00	880113
RUTH MORRIS	00546 28 1/2 RD	GRAND JUNCTION	CO 81501	3032434575	10.00	880127
MRS DORIS MORRIS	31270 JOHN WALLACE RD	EVERGREEN CO	80439	3036701273	50.00	880229
HARRIET MORRISON	13150 W 9TH AVE	GOLDEN CO	80401	3032331997	22.00	880113
HELVISE G MORSE	234 S JASMINE ST	DENVER, CO	80224	3598932	25.00	880113
VIRGINIA MORSTEIN	779 SEVEN OAKS RD	CARBONDALE CO	81623	3039633421	50.00	880113
JANET MORTON	476 KENTON ST	AURORA	CO 80010	3033415982	5.00	880113
ANDREW & SHARON MOSTENAN	RT 115 E 7TH ST	CRAIG CO	81625	3038243126	25.00	880113
CLAUDE & DELLA MOTTRAM	609 26 S Rd	GRAND JUNCTION	CO 81506	3032439443	20.00	880210
CYNTHIA A MOUSEL	9214 E MANSFIELD AVE	DENVER, CO	80237	3037703139	20.00	880210
MRS LOUIS MOZER	7111 S POPLAR CT	ENGLEWOOD CO	80112	3037795299	10.00	880113
Susan T Moya	62 South Pearl St.	Denver	CO 80209	7229963	15.00	880210
JUDY MUGLER	6249 S FENTON CT	LITTLETON CO	80123	3037949650	10.00	880210
NICHOLAS MULLER	3197 S EMPORIA COURT	DENVER CO	80231	3036718151	10.00	880210
GERALD MULLINS	590 SPRUCE	MONTE VISTA CO	81144	3038522389	10.00	880210
MR & MRS HISAKI MURAKAMI	3201 RACE ST	DENVER, CO	80205	3032956151	25.00	880113
GLADYS MURPHY	557 SCHOOL	CRAIG CO	81625	3038246615	25.00	880229
IRENE MURPHY	1402 E FOUNTAIN	COLOR SPOCS CO	80910	7196321791	25.00	880127
GENEVIEVE A MURPHY	415 BOWEN ST	LONGMONT, CO	80501	3037763392	25.00	880229
MARGARET MURRAY	3105 N PROSPECT	COLOR SPRINGS CO	80907	7196353358	5.00	880127
ANETA B MURRAY	161 S UPHAM CT	LAKEWOOD, CO	80226	2380619	10.00	880113
OLIVE B WHITNEY MUSICK	1770 MESA RD	COLORADO SPRINGS, CO	80904	7196344031	50.00	880113
Robert W Musil	1331 G Street	Salida	CO 81201	3035392221	12.00	880113
KRISTY L MUSSER	02722 W 24TH ST	GREELEY	CO 80631	3307647	15.00	880127
MARTIN NAGLICH	PO BOX 4	STARKVILLE	CO 81074	7198467434	20.00	880127
RUBY A NASH	2650 MONACO PY	DENVER, CO	80207	3885142	15.00	880309
EDWARD NAVARRO	1130 MOUNTAIN VIEW #3	LONGMONT CO	80501	3037720392	50.00	880113
MR RONALD H NEB	247 S PARK AVE	FT LUPTON, CO	80621	3038574489	25.00	880127

P BERNIECE NEEDHAM	1411 8TH ST. 307	GOLDEN/ CO	80401	3032771831	10.00	880210
BETTY J NEHRBUSE	36918 WELD CO RD. 39	EATON, CO	80615	3034542964	10.00	880113
ANITA NEIN	16721 COUNTY RD 23	OVID CO	80744	3034635377	10.00	880113
Fischer B Nelson	2670 Eudora	Denver	CO 80207	3218519	10.00	880113
William Nelson	1000 Texas	Grand Junction	CO 81501	3032421912	10.00	880229
Allen H Nelson	RIDGE ROAD	Nederland	CO 80466	3032583391	10.00	880127
BEULAH D NELSON	17075 S GOLDEN RD	GOLDEN	CO 80401	3032794066	10.00	880113
JOAN M NELSON	4295 LAMAR ST	WHEAT RIDGE	CO 80033	4242194	10.00	880229
DELORUS E NETZEL	3775 S FOREST WAY	DENVER, CO	80237	3037586837	20.00	880127
MR COURTNEY B NEUMANN	480 S ALCOTT ST	DENVER	CO 80219	9361117	25.00	880309
GERALDINE D NEWHARD	1335 SAGE CT	ASPEN, CO	81611	3039252293	20.00	880113
CAROL L NEWMAN	9604 W 87TH CIR	ARVADA, CO	80005	3034235772	15.00	880210
CAROL G NEWMAN-HOLITZA	1715 DAISY COURT	BROOMFIELD	CO 80020	4662742	15.00	880127
MR C W NEWTON	01380 BLUEBELL	BOULDER	CO 80302	3034432110	20.00	880210
ROSE E NICHOLLS	2401 EAST ST 203	GOLDEN	CO 80401	3032792714	15.00	880113
ROBBIE J NICHOLS	2920 Steele St	Denver	CO 80205	3033993716	15.00	880113
MARIANNE E NICK	4940 T-BIRD CR	BOULDER, CO	80303	3034947291	35.00	880113
MR HARRY B NICODEMUS	2344 S LAFAYETTE ST	DENVER	CO 80210	7225106	5.00	880113
ANN NIGRO	02424 ALIA	PUEBLO	CO 81004	7195643323	5.00	880210
Byrdie Niles	P O BOX 475	Hudson	CO 80642	3035369205	15.00	880229
ROSE NILSON	420 E 104 PL	NORTHGLENN CO	80233	3034516815	20.00	880113
JOHN NORIEGA	10080 W 78TH AVE	ARVADA CO	80005	3034205691	10.00	880127
VICTORIA M NORRIS	1768 S NILE CT	AURORA, CO	80012	3037501752	10.00	880210
HELEN NORTON	2443 12TH AVE	GREELEY CO	80631	3033539581	20.00	880113
MARVIN NORWOOD	00320 CAMBRIDGE	BRUSH	CO 80723	3038422090	25.00	880309
PAULINE NORWOOD	620 RAY ST , #J-1	BRUSH CO	80723	3038424035	10.00	880113
DONELLA J NOVAK	260 MARTIN DR	BOULDER	CO 80300	3034948644	20.00	880210
Doyle A Nyberg	PO Box 149	Buena Vista	CO 81211	3033958150	35.00	880113
MR DONALD L OBRIAN	1611 RESERVOIR RD	GREELEY, CO	80631	3569032	10.00	880113
KATHLEEN C ODEFER	8050 S JASMINE CIR	ENGLEWOOD, CO	80112	7714168	35.00	880323
MR MARCELLUS E OLEARY	516 W PITKIN AVE	PUEBLO, CO	81004	7195450746	10.00	880309
STEPHEN OLIVAREZ	08820 CODY ST	BROOMFIELD	CO 80020	4223690	15.00	880113
STEPHEN OLIVAREZ	08820 CODY ST	BROOMFIELD	CO 80020	4223690	15.00	880210
FRANCIS OLSEN	731 GREENS LN	FOWLER CO	81039	7192635609	10.00	880127
MR W R OLSON	62024 E RD	GRAND JUNCTION	CO 81503	3032422709	10.00	880229
ALICE F OGUINN	1825 QUEENS DR	LONGMONT, CO	80501	3037768617	5.00	880113
Mary C Ormsbee	315 20TH ST	Boulder	CO 80302	3034420062	25.00	880127
CILIA ORTIZ	3944 SHEFFIELD	PUEBLO CO	81005	7195611420	5.00	880309
MARJORIE ORTIZ	2910 IMPERIAL AVE	PUEBLO, CO	81005	7195619590	5.00	880113
NEAL OSBORN	30 ROBERTSON RD	PUEBLO	CO 81001	7195460319	15.00	880210
MR JULIUS L OSWALT	115 SPRING ST	MORRISON	CO 80465	3036974716	15.00	880113
Pearl Owings	2073 S Clarkson	Denver	CO 80210	7770319	10.00	880127
MR KENNETH W OXLEY	1427 S SHERMAN ST	LONGMONT, CO	80501	3036510217	20.00	880113
DANIEL PACHECO	4620 COUNTY RD 134	HESPERUS CO	81326	3035882262	15.00	880113
RUDOLPH & RUDY PACHECO	P.O. BOX 367	SAN PABLO	CO 81153	3036723812	10.00	880210
Frederick L Fage	2610 S Garfield Way	Denver	CO 80210	7594353	5.00	880127
MAUREEN B PAGE	1270 MARION ST. 309	DENVER, CO	80218	8639221	25.00	880113
STANLEY L PALMER	PO BOX 15444	COLD SPRINGS	CO 80935	7195742084	25.00	880127
MARIANNA PALMER	215 VIVIAN ST	LONGMONT, CO	80501	3037763445	15.00	880127
MR DWIGHT F PALSER	02118 22ND ST RD	GREELEY	CO 80631	3533382	10.00	880229
TAND PADLUCCI	2015 RATON	LAJUNTA CO	81050	7193847954	10.00	880113
MR DENNIS PAPIERNIK	11555 E MEXICO	AURORA CO	80012	3033376486	15.00	880229
PATRICIA M PAPIERNIK	6657 VIVIAN ST	ARVADA	CO 80004	3034211481	5.00	880127
DOROTHY PARKER	RR 1 16R BREWSTER LN	FLORENCE	CO 81226	3037846146	12.00	880113
MC N P PARKS	2571 W 2ND AVE	DURANGO, CO	81301	3032471580	5.00	880113
MR STEPHEN C PARSONS	2461 S VRAIN ST	DENVER, CO	80219	3039377685	20.00	880113
Mary Louise Patel	77 W Cedar	Denver	CO 80223	7222531	25.00	880229
ROGER/CANDIE PATINO	200 WILFRED RD	BERTHOUD CO	80513	3035323241	10.00	880229
Patricia A Paton	260 Newport St	Denver	CO 80220	3338205	25.00	880113
MR JERE L PAULMENO	10034 GUIVAS ST	THORNTON, CO	80221	3034664885	25.00	880229

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MR ANTONIO J PACHECO	1215 S DEEMITE WAY	DENVER, CO	80231	3037550989	20.00	880210
MARGARET M FAZTON	112 RIVERVIEW DR	DURANGO, CO	81301	3032473889	8.00	880127
CRISTA TAYLOR	135 S OGDEN ST	DENVER, CO	80209	3037440902	25.00	880113
HARVEY E PEACH	50773 25 RD	GRAND JUNCTION	CO 81505	2429146	50.00	880113
MR KARL R PEACOCK	13056 MERCURY DR	LITTLETON, CO	80124	7902317	25.00	880229
MARY PEARSON	421 PINE	CARIN CITY	CO 81212	3032693144	10.00	880113
MR MARTIN PEBLER	1943 W 15TH ST	LOVELAND CO	80538	3036676359	25.00	880113
ELVERDA W PEDERSON	1720 12TH AVE	GREELEY, CO	80631	3527633	10.00	880113
M M LAGE PEDERSEN	PO BOX 1092	ASPEN CO	81612	3039252846	10.00	880127
OLEN PENLAND	5008 S TAMAR DR	LITTLETON CO	80123	3037981872	10.00	880210
DAVID PENNEY	11601 GARFIELD ST	DENVER	CO 80233	3034572210	10.00	880210
PHILIP PERDEW	82369 S MALISON	DENVER	CO 80210	7566146	20.00	880113
MR CHARLES D PEREZ	2547 S STUART WY	DENVER	CO 80219	9352288	5.00	880113
MAXINE R PERKO	8445 39TH AVE W	ARVADA CO	80004	3034242423	40.00	880323
NEBERT HELEN PERRY	8716 W 57TH AVE	ARVADA CO	80002	3034220969	10.00	880113
ROSE PERUCCA	4220 WYANDOT ST	DENVER, CO	80211	3034772329	10.00	880323
John Peterson	1427 S ONEIDA ST	Denver	CO 80224	3037564284	20.00	880113
MR EDWIN W PETTIS	00125 VISTA GRANDE RD	GRAND JCT	CO 81503	2424929	15.00	880229
Gala Philbrick	4225 Beach Ct	Denver,	CO 80221	4335486	25.00	880229
JOAN PHILLIPS	1081 2420 DR	CEDARIDGE	CO 81413	3038353349	10.00	880210
MR RICHARD B PHILLIPS	92115 SAGUARO RD	GRAND JCT	CO 81503	3032434977	5.00	880127
HILLEN A PHILLIPS	308 11TH AVE	LONGMONT, CO	80501	3037767759	10.00	880127
VIOLLET PICCOLI	29321 HWY 160	DURANGO CO	81301	3032474359	15.00	880113
VALERIA C PINZENSCHAM	ROUTE 1 BOX 1120	BENNETT, CO	80102	3036443378	20.00	880113
MEROY PLASCENCIA	1902 F 5TH	PUEBLO CO	81001	7195421278	5.00	880323
WALTER PLYWASKI	751 L FORK RD.	BOULDER	CO 80302	3034444912	25.00	880127
MR LOUIS PODREVSEK	3210 D 3/4 RD	CLIFTON, CO	81920	4340619	12.00	880113
MS ANGELA POERSCH	1730 MEAD ST	DENVER CO	80204	3035347021	25.00	880113
MS MARIAN POHLIT	00729 MONTEREY CT	LOVELAND	CO 80537	6696288	10.00	880127
ROBERT POIS	1521 9 ST	BOULDER CO	80302	3034491041	25.00	880113
ELIZABETH POLLAK	1298 S DEPEW	LAKEWOOD CO	80226	3039221795	20.00	880113
SANDRA L POMERANTZ	140 S GRAPE ST	DENVER, CO	80222	3883069	20.00	880113
EDYTHE C PURPA	2637 VALMONT RD , #37	BOULDER, CO	80304	3034422847	10.00	880210
MR RUSSELL O PORTER	1424 S DOVER WAY	LAKEWOOD, CO	80226	9863026	15.00	880229
MR RUSSELL O PORTER	1424 S DOVER WAY	LAKEWOOD, CO	80226	9863026	15.00	880309
MARY POST	8090 S MONACO CIRCLE	ENGLEWOOD CO	80112	3037411722	20.00	880113
JIM POST	4779 S IRVING	ENGLEWOOD CO	80110	3037947852	15.00	880113
MARGARET POTTORFF	PO BOX 647	NATURITA CO	81422	3038652527	15.00	880113
MR DAVID POUNDSTONE	04121 W 49TH AVE	DENVER	CO 80212	4337558	20.00	880113
MR MIKE POWELL	1095 PIKE VIEW	LAKEWOOD CO	80215	3032333260	15.00	880113
Mary Pratt	123 So Logan	Denver	CO 80209	3037333420	25.00	880127
MRS MARGARET PRESCOTT	4450 E OXFORD PL	ENGLEWOOD, CO	80110	3037582280	40.00	880210
MR AND MRS PRESTON	208 E BASELINE RD.	LAFAYETTE	CO 80026	3036655394	10.00	880113
ANN TAIT PROSSER	724 ASH ST	DENVER, CO	80220	3331857	25.00	880210
GLORIA A PROESSNER	5625 YARROW ST	ARVADA	CO 80002	3034241117	10.00	880229
David M Pruett	701 Stagecoach Drive	Canon City	CO 81212	3032758759	10.00	880229
MARGARET O PULLUM	999 FORTINO BLVD	PUEBLO, CO	81008	7195441869	15.00	880113
CHARLOTTE J PURVIS	1365 LARK COURT	BOULDER, CO	80303	3034440744	75.00	880113
JOHN PUSEDU	2105 ROSEWOOD LANE	PUEBLO	CO 81005	7195648193	5.00	880229
LINDA D PYLICAN	5870 W 37TH AVE	WHEAT RIDGE, CO	80033	3034209231	10.00	880127
SHARON K QUINLAN	1065 GAYLORD ST, #N	DENVER, CO	80206	3033593098	15.00	880113
MARY C QUINN	1344 EUDORA ST	DENVER, CO	80220	3333807	5.00	880113
BARBARA J RADEMACHER	BOX 207	MEAD	CO 80542	3035354563	10.00	880113
MR JOHN O RAE	4310 PALI WAY	BOULDER, CO	80301	3035304147	10.00	880113
MARY RAEL	PO BOX 354	SAN PABLO	CO 81153	3036723513	10.00	880210
MRS FANNIE RAIZEN	6780 E CEDAR AVE. #510	DENVER CO	80224	3033212609	25.00	880113
MR BENJAMIN RALEIGH	P.O BOX 260172	LAKEWOOD	CO 80226	3039860492	7.00	880113
RAMON RAMOS	00330 LINDA VISTA DR	FOUNTAIN	CO 80817	3033825134	15.00	880127
Victor Rangel	549 HARRISON AVE	Ft Lupton	CO 80621	3038576856	25.00	880127
MARY RAUZI	101 GRANT ST #508	DENVER	CO 80203	3037333806	15.00	880113

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AILEEN H RAY	4325 PERRY ST	DENVER	CO	80212	4772815	12.00	880229
MR ARMAND RAYMOND	1566 S ELM ST	DENVER, CO		80222	7563129	5.00	880113
CLARA M READ	750 JOLIET ST	AURORA, CO		80010	3033416633	15.00	880210
MR ROBERT J JR REARDON	1362 COOK ST	DENVER, CO		80206	3779419	25.00	880127
Holly Reche-Felniee	614 Eleventh Street	Alamosa	CO	81101	7195895093	10.00	880127
RAYMOND REDMAN	5855 W LEHIGH	DENVER, CO		80235	3039860203	10.00	880113
PALMA W REDMON	450 CHIPETA AVE , APT. 14	GRAND JCT, CO		81501	3032418026	10.00	880127
CHARLOTTE REESE	1036 E 24TH AVE	DENVER, CO		80205	3038610877	5.00	880113
MR JOHN T REEVES	1000 S FILLMORE WAY	DENVER, CO		80209	3037330388	25.00	880127
JOAN A REID	805 E LAUREL	BOULDER	CO	80303	3034940382	10.00	880229
LILLIAN G REILLY	7650 W 68TH AVE #310	ARVADA, CO		80004	3034209441	5.00	880323
WILLIAM REINHARDT	740 17TH STREET	BOULDER	CO	80302	3034445460	35.00	880309
FABIOLA M RENNON	6891 JORDAN DR	DENVER	CO	80221	3034280101	15.00	880309
ERIC RENZ	BOX 153	GRANBY CO		80446	3038873213	30.00	880210
CYNTHIA N REYNOLDS	01231 14TH ST	GREELEY	CO	80631	3033569307	12.00	880127
Alice Reynolds	3333 So Wabash Crt	Denver	CO	80231	3033373134	10.00	880229
Thomas Reynolds	480 Newport St	Denver	CO	80220	3885104	20.00	880113
BEVERLY RICH	BOX 202	SILVERTON	CO	81433	3033875781	10.00	880127
MR PAUL RICHARDS	703 5TH AVE	DURANGO	CO	81301	3032474832	35.00	880309
MRS ANN RICHARLSON	1165 S GLENCOE	DENVER	CO	80222	3037569696	10.00	880113
HELEN RICHARLSON	01145 MESA RD	COLORADO SPRGS	CO	80904	7196334707	10.00	880113
GEORGIA R RICHARDS	1405 S VRAIN WAY	DENVER, CO		80219	9349332	7.00	880229
SUSAN A RICKETTS	1955 GLENCOE ST	DENVER, CO		80220	3033997277	5.00	880113
IFENE RIDDLE	03746 S BANNOCK	ENGLEWOOD	CO	80110	7615357	10.00	880113
Illie Riddleg	Ht. 4. Box 20	Las Animas	CO	81054	7194561133	25.00	880309
WALTER RIFEK	7200 E 73RD AVE	COMMERCE CITY, CO		80022	3032885103	35.00	880113
CATHERINE RINGDENBERG	4530 OSAGE DR	BOULDER, CO		80303	3034947573	15.00	880127
JOHN S RITCHIE	P O. BOX 64	GRAND JUNCTION, CO		81502	3032424045	10.00	880113
MARGARET N RIVERA	5310 W 73RD PL	ARVADA	CO	80003	4219823	25.00	880113
PRISCILLA ROBE	1275 MARSHALL RD	BOULDER CO		80303	3034942167	20.00	880113
MR ERNEST E ROBLINS	1634 S RALEIGH ST	DENVER, CO		80219	3039354282	10.00	880113
MARY E ROBERTS	2416 DELWOOD AVE	DURANGO	CO	81301	3032471050	10.00	880113
BOB ROBERTS	1621 PUEBLO CT	DENVER	CO	80229	2874410	5.00	880127
JOSEPHINE ROBERTSON	550 SPRUCE ST.	BOULDER	CO	80302	3034445524	50.00	880127
JUNE ROBINSON	4524 LAQUINA PLACE	BOULDER	CO	80303	3034998818	10.00	880127
VICKI ROBINSON	429 MARTIN STREET	LONGMONT	CO	80501	3037726851	10.00	880113
MISS D ELIZABETH ROBINSON	370 S 43RD ST	BOULDER	CO	80303	3034998807	25.00	880229
JEAN E ROBINSON	2563 S KRAMERIA ST	DENVER, CO		80222	7582181	50.00	880113
JANE J ROBINSON	13864 E. LEHIGH. #H	AURORA CO		80014	3036958592	15.00	880127
MR THORNTON B RODY	2269 IVANHOE ST	DENVER, CO		80207	3033887993	10.00	880113
ROMANITA S RODRIGUEZ	2695 S KNOX CT	DENVER	CO	80219	3039350234	10.00	880127
MR WALLACE RODRIGUEZ	1719 S MONACO PY	DENVER, CO		80224	3037531913	25.00	880309
JOE RODRIGUEZ	PO BOX 115	GARDNER	CO	81040	7197462282	10.00	880127
JOE RODRIGUEZ	RTE 2 BOX 120A	SAN PABLO CO		81153	3036723524	5.00	880113
CHARLIE ROBERT	35275 HWY 184	MANCOS	CO	81328	3038824106	5.00	880127
JANET C ROGERS	4293 E 126TH AVE	THORNTON, CO		80241	3034570910	10.00	880309
MR ROBERT ROGERS	1020 12TH ST	BOULDER, CO		80302	3034448298	10.00	880113
HELEN ROGERS	666 GAYLORD ST	DENVER, CO		80206	3033777603	25.00	880113
JANE N ROGERS	14979 W 77TH DR	GOLDEN, CO		80403	3034248044	50.00	880113
MR PHILIP H ROGERS	1050 YOUNGFIELD ST	GOLDEN, CO		80401	3032372568	15.00	880113
CATHERINE A ROWENSKI	4772 KELLOGG CR	BOULDER, CO		80303	3034437150	15.00	880127
YETTA ROLLIN	01320 ROBERTSON	FT COLLINS	CO	80524	3034933107	5.00	880127
MILFRED FOLSTON	03931 KING ST	DENVER	CO	80211	4770097	10.00	880113
MS WANDA ROMLO	01047 ADAMS	DENVER	CO	80206	3033336267	20.00	880113
MARY ROMER	617 S JASMINE WAY	DENVER, CO		80224	3033889512	10.00	880309
MARY ROMER	617 S JASMINE WAY	DENVER, CO		80224	3033889512	10.00	880323
Gloria Romero	3833 Umatilla St	Denver	CO	80211	3034333145	20.00	880113
PEGGY ROONEY	425 L STR	PENROSE CO		81240	3033723415	10.00	880229
PATRICIA C ROSALES	02118 23RD ST	GREELEY	CO	80631	3561854	15.00	880113
MR MICHAEL A ROSALES	3427 S WOLFF ST	DENVER	CO	80236	3039365031	10.00	880127

RICHARD ROSE	2615 S. LEWIS	DENVER CO	80222	3037582673	75.00	880127
ELIZABETH H ROSE	444 GARFIELD ST	DENVER CO	80206	3213119	50.00	880210
ANNA & STANLEY ROSEN	2362 W 76TH AVE	DENVER CO	80221	3034282718	10.00	880113
HELEN M ROSLING	2901 WELD CO RD. 91	RUGGEN, CO	80652	7038495371	25.00	880113
MIRIAM ROSS	6085 W 51ST AVE	ARVADA CO	80003	7034221507	10.00	880309
VERNA F ROSS	5157 DUDLEY ST	ARVADA CO	80002	3034246551	10.00	880113
RICHARD ROTH	1220 26TH ST	BOULDER CO	80302	3034433497	35.00	880113
JANE ROTH	PO BOX 424	PALISADE CO	81526	3034645582	15.00	880229
DAVID ROTH	102 PURDUE	PUEBLO CO	81005	7195614888	5.00	880113
BERTHA ROTH	2281 S HUMBOLDT ST	DENVER CO	80210	7333152	5.00	880113
MR WESLEY E ROUSHALL	2711 COLORADO AVE	DURANGO, CO	81301	3032591171	25.00	880113
EDNA & DAVID ROWAN	1505 6450 RD	MONTRORSE CO	81401	3032499520	10.00	880210
FRANCIS ROYBAL	RT 3 BOX 214	TRINIDAD CO	81082	7198466774	20.00	880127
Priscilla Roybal	1212 So Federal #513	Denver, CO	80219	3039361857	5.00	880113
CARMELITA ROZADA	620 S. ALTON WAY, #7-B	DENVER CO	80231	3033640384	25.00	880210
JUANITA RUSH	1765 SUNSET BLVD	GOULDER CO	90302	3034431015	1.00	880127
MR HOWARD A RUSH	782 S CLARKSON ST	DENVER, CO	80209	7225440	30.00	880113
ELSIE LOUI RUSSELL	2470 RALEIGH ST	DENVER, CO	80212	3034772470	5.00	880210
ARLINE RUSTIN	413 DEFRANCE CT	GOLDEN CO	80401	3032799339	10.00	880113
M/M S RUTTENBERG	1945 DEER VLY RD	BOULDER CO	80303	3034941632	50.00	880113
MR AUGUSTINE RUYBAL	00821 CRAGHOPE	DENVER CO	80221	4293268	20.00	880210
LYDIA RUYLE	02101 24TH ST	GREELEY CO	80631	3033521643	25.00	880113
LYDIA RUYLE	02101 24TH ST	GREELEY CO	80631	3033521643	25.00	880127
MR & MRS THOMAS RYAN	996 S WILLIAMS ST	DENVER, CO	80209	3037225239	20.00	880210
MARGO SACK	1573 MYRTLE ST	BRIGHTON CO	80601	3036590600	24.00	880210
Robert Sakaguchi	1450 Dunsford Way	Broomfield CO	80020	3034694337	10.00	880113
MR J LEE SAMPSON	5025 E 6TH AVE	DENVER, CO	80220	3033357483	50.00	880113
DONNA SAMPSON	00025 S COOY CT	LAKEMOOD CO	80226	3032333716	5.00	880210
MR MARVIN SANCHEZ	14832 E SECURITY PL	AURORA CO	80011	3033441428	50.00	880113
ABEL SANCHEZ	1640 LA CROSSE	PUEBLO CO	81001	7195456121	10.00	880127
MRS BEVERLY SANDERS	295 Kiowa	Boulder CO	80303	3034990366	10.00	880113
VICKI S SANDEPSON	02713 W 19TH ST DR	GREELEY CO	80631	3522590	5.00	880127
DOROTHY L SAPP	73 S HOLLAND ST	LAKEMOOD, CO	80226	2376063	5.00	880127
MAE R SARLO	714 HENRY AVE	PUEBLO, CO	81005	7195611710	10.00	880323
M/M CHARLES SATTER	603 SHADY TRFET DR	LITTLETON CO	80120	3037942210	25.00	880113
JOANNA SAUARESE	3545 28TH ST. APT 203	BOULDER CO	80301	3034470031	10.00	880127
SALLY SAUER	2422 COREY ST	LONGMONT CO	80501	3037720754	15.00	880127
HELEN SAWYERS	70 WATSON BLVD	SECURITY CO	80911	3033925953	5.00	880113
MR J W SCHAUKOWITZ	628 BROWN AVE	PUEBLO, CO	81004	7195450886	25.00	880113
MR CHARLES G SCHAUL	2102 E 116TH PL	NORTHGLENN, CO	80233	3034526324	10.00	880113
PAULA SCHEID	2575 DAHLIA ST	DENVER, CO	80207	3033882981	15.00	880127
MR WALTER A SCHENKMAN	710 E 19TH ST RD	GREELEY, CO	80631	3526648	10.00	880113
MARCIA LAN SCHERTZ	07138 S ULSTER ST	ENGLEWOOD CO	80112	3037715403	10.00	880210
DON & ELVIRA SCHIERLING	2883 S. OTIS	DENVER CO	80227	3039857452	25.00	880113
CHRISTINE M SCHILLEREFF	2971 S HARRISON ST	DENVER, CO	80210	3037586292	25.00	880127
MR ALFRED A SCHILLING	3390 W 29TH AVE	DENVER, CO	80211	3034553824	25.00	880113
ELEANOR C SCHLAUGER	289 1/2 MOUNTAIN VIEW ST	GRAND JCT. CO	81503	3032422782	10.00	880210
MRS DAVID F. SCHLICHER	5810 SUNSHINE CANYON DRIVE	BOULDER CO	80302	3034436891	10.00	880210
RICHARD/JUDITH SCHLUPP	5194 ZINNIA CT	ARVADA, CO	80002	3034244847	10.00	880229
RITA SCHMACHTENBERGER	2705 INDUSTRIAL LN	BROOMFIELD CO	80020	3034663684	5.00	880113
DON & JANE SCHMITZ	7661 E EASTER PL	ENGLEWOOD CO	80112	3037718169	12.00	880113
DON & JANE SCHMITZ	7661 E EASTER PL	ENGLEWOOD CO	80112	3037718169	15.00	880210
STEVEN SCHMITZ	10851 HOLLY	NORTH GLENN CO	80233	3034528256	50.00	880113
JUDY SCHNEIDER	6313 COLUMBIA DR.	HIGHLAND CO	80126	3034700530	25.00	880210
MR EARL L SCHNEIDER	9031 CODY CIR	WESTMINSTER, CO	80020	3034318151	10.00	880229
CHARRON SCHOENBERGER	00511 BICKLEY	COLO SPRINGS CO	80911	7193927776	50.00	880210
ILONA SCHREIBER	1625 LENIMER ST. #905	DENVER CO	80202	3038202179	12.00	880309
WILLIAM SCHROEDER	P. O. BOX 39	FREDERICK CO	80530	3038333834	25.00	880113
MR PAUL J SCHUBERT	11295 E OHIO PL	AURORA, CO	80012	3401259	25.00	880113
MS JOAN SCHULTZ	770 VIVIAN ST	GOLDEN CO	80401	3032379370	10.00	880113

MR DANNE E SMITH	1519 S IRLIS WAY	LAKEWOOD	80226	9808913	25.00	880210
BETTY SNYDER	1508 S WINDONA CT	DENVER CO	80219	3039356984	5.00	880127
ALM SNYDER	PO BOX 60	GLADE PARK CO	81523	3032425162	15.00	880113
ALM SNYDER	PO BOX 60	GLADE PARK CO	81523	3032425162	15.00	880210
MR RICHARD J SNYDER	939 S CORONA ST	DENVER, CO	80209	7223073	10.00	880210
MR KENNETH P SODENBERG	11819 WASHINGTON ST. D-110	NORTHGLENN, CO	80233	3034521391	75.00	880210
L MA SOLANO	1700 E ALAMEDA AVE	DENVER, CO	80209	3037224924	20.00	880229
A DEPT SPENCER	3077 E 4TH AVE	DURANGO	CO 81301	3032474136	10.00	880113
Ernothy J Spencor	5105 E Atlantic Place	Denver	CO 80222	7561746	25.00	880113
BETTY SPINDLER	04000 W HAMILTON PL	DENVER	CO 80236	3039350044	25.00	880127
GERTIA A SPITELLIE	4590 NEWLAND ST	WHEAT RIDGE	CO 80033	3034214245	25.00	880113
MR & MRS SPRING	6661 S MAGNOLIA CT	ENGLEWOOD, CO	80111	3037717912	10.00	880127
JAY SPRUHL	4777 MCKINLEY	BOULDER	CO 80303	3034445590	25.00	880229
E DORAH A SQUIRES	1165 S WINDONA CT	DENVER	CO 80219	9350023	25.00	880229
PETER STAPP	7253 E BUCKNELL PL	DENVER CO	80231	3037554862	25.00	880323
KATHRYN P STROCK	450 CLAYTON ST	DENVER, CO	80206	3334863	10.00	880210
LA ANNE STEELE	6675 AMMONS ST	ARVADA	CO 80004	4214551	5.00	880113
MR JOHN D STEELE	60921 W 11ST ST RD	GREELEY	CO 80634	3301264	15.00	880113
MARY LOU STEINROD	2324 S OLIVE ST	DENVER, CO	80224	3037531313	40.00	880113
MR EDMUND STEINAGEL	2030 S GRANT ST	DENVER	CO 80210	7226217	20.00	880229
PAUL STEINKE	106 DAWSON	LONGMONT	CO 80501	3036510167	10.00	880113
MR JOHN STENGEL	07673 ARLINGTON DR	BOULDER	CO 80303	3034993174	5.00	880113
MR JOSEPH STEPANEK	01622 HIGH ST	BOULDER	CO 80302	4439329	15.00	880113
JEANNE STEVENS	4560 LARK BUNTING, #5A	FORT COLLINS CO	80526	3032230560	25.00	880113
BERGENA STEVENS	6664 WELCH ST	ARVADA CO	80004	3034213625	25.00	880113
PAUL J STEWARD	7795 PEGOS 571	DENVER	CO 80221	3034292637	12.00	880113
MURIEL M STIEBER	720 S MCKINLEY AVE	FT LUPTON, CO	80621	8572337	35.00	880113
MS MARIE STILSON	1521 CRAIG	PUEBLO CO	81003	7195430224	10.00	880113
EDNA L STITELER	1837 DOVER ST	LAKEWOOD	CO 80215	3032332602	25.00	880113
CELENE M STOWERS	2511 THOMAS AVE	DURANGO, CO	81301	3032474790	35.00	880113
RUTH S STRASEN	4895 SILVER SPRUCE LN	EVERGREEN	CO 80439	3036748192	25.00	880113
ETHEL STROH	2886 S CORONA	ENGLEWOOD CO	80110	3037812513	10.00	880210
MARGARET M STRUCK	537 STEELE ST	DENVER, CO	80206	3033223665	10.00	880210
John Strup	P O. BOX 1545	Lamar	CO 81052	7193364116	75.00	880113
John Strup	P O. BOX 1545	Lamar	CO 81052	7193364116	75.00	880210
Fiona M Stwalley	3836 High St.	Denver	CO 80205	3032966336	5.00	880113
MR & MRS DAVID SULLIVAN	1003 COUNTY RD 333	IGNACIO	CO 81137	3038832322	35.00	880229
NORMA SUMMER	3001 VAIL	PUEBLO, CO	81005	7195641725	10.00	880229
MR DOUGLAS W SUNDBY	5208 S NIAGARA CT	ENGLEWOOD, CO	80111	7410320	30.00	880229
MABLE D SUSMAN	1055 ADAMS COURT, #511	BOULDER, CO	80303	3034478293	10.00	880309
MR WILLIAM SUTTERLIN	1562 S JAMAICA ST	AURORA CO	80012	3037514720	12.00	880113
ELLEN W SWANSON	850 MAGNOLIA ST	DENVER, CO	80220	3224853	10.00	880113
EILEEN T SWARTZFAGER	1274 SNOWBERRY DR	GOLDEN	CO 80401	3035261029	15.00	880113
David Sweetnam	1375 High #303	Denver	CO 80218	3222083	10.00	880309
KATHRYN SWITZER	1906 12TH AVE	GREELEY CO	80631	3033528033	15.00	880229
BETTY A SWORDS	2490 S HOLLY ST	DENVER, CO	80222	7569349	10.00	880127
SAHAD TABATABAI	6604 MCCALL DRIVE	LONGMONT CO	80501	3036511472	10.00	880210
ROSE TAFQYA	841 BRONCO ROAD	DENVER	CO 80221	3034286106	25.00	880113
JENNIE E TAFQYA	2400 MEADE ST	DENVER, CO	80211	3034334172	18.00	880309
MR JACK D TALIAFERRO JR	8141 WEST FROST AVE	LITTLETON	CO 80123	3039796723	35.00	880127
TREVA E TALMAGE	2696 S KING ST	DENVER	CO 80219	3039355337	5.00	880113
EVIE TAMM	1709 APPELLES CR	LAFAYETTE	CO 80026	3036652192	5.00	880113
MR WALTER H TANTTILA	03502 22ND ST	BOULDER	CO 80302	4436507	25.00	880113
JOHN TARR	733 WEDGE DR	GRAND JUNCTION CO	81506	3032418331	5.00	880210
Terrance Tarr	2620 S Fillmore	Denver	CO 80210	3037577578	30.00	880113
ANNA TAUSSIG	110 MARIAN DRIVE	PUEBLO	CO 81004	7195423807	10.00	880113
WARREN TAYLOR	7070 BEACH	WESTMINSTER	CO 80030	4261353	25.00	880113
FRANK TAYLOR	7674 S DATARA CIR	LITTLETON CO	80120	3037945639	15.00	880210
Rose Taylor	524 N. Diamond Avenue	Canon City	CO 81212	3032753539	10.00	880113
MR JOHN I TAYLOR	35 OWL CREEK	BOULDER, CO	80302	3034440993	25.00	880229

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GEORGINA B TENORIO	1095 S DALE CT	DENVER	CO	80219	9371601	15.00	880309
CARMEN V TERRIQUEZ	1505 S HAZEL CT	DENVER	CO	80219	3039354419	10.00	880309
PHOEBE F THAPP	2375 S KING ST	DENVER, CO		80219	3039355958	20.00	880113
GLADYS C THEISEN	1790 W MOSIER PL, APT 706	DENVER	CO	80223	3039221227	10.00	880113
WILLIAM THOGODE	5545 CLAY ST	DENVER	CO	80221	4330120	5.00	880113
MR ROBERT E THOMAS	03523 BRYANT ST	DENVER	CO	80211	4555180	7.00	880113
WENDY THOMAS	408 LOFT ANGEL RD.	BOULDER	CO	80302	3034493442	25.00	880113
WENDY THOMAS	408 LOFT ANGEL RD.	BOULDER	CO	80302	3034493442	25.00	880127
MARGARET THOMPSON	07980 W 26TH AVE	LAKEWOOD	CO	80215	3032333525	15.00	880113
MARY C THOMPSON	3226 1/2 WEST 2ND AVE	DURANGO, CO		81301	3032473498	10.00	880323
SILAS & ADDIE THRONEBURY	10440 W 46TH AVE	WHEAT RIDGE, CO		80033	3034248507	10.00	880127
MR PETE E TOLINI	2359 CO RD. 250	SILT, CO		81652	8762110	15.00	880113
LYDIA B TOLL	00777 VINE	DENVER	CO	80206	3331655	35.00	880127
THELMA TOMPKINS	9869 LANE ST	THORNTON CO		80221	3034526264	10.00	880210
EDITH TORELLI	112 DUNSMERE	PUEBLO CO		81004	7195427411	10.00	880113
JEANETTE TOPPEL	11120 HARRIS WAY	DENVER	CO	80233	3034572861	15.00	880127
Ralph Torres	4205 Knox Court	Denver	CO	80211	3034332981	75.00	880113
MRS. CAROL TOWNSEND	1280 FILLMORE	DENVER	CO	80206	3033944050	10.00	880210
HARRIET M TRABER	00105 LOST LN	GRAND JCT	CO	81501	2421855	10.00	880323
VINCENT TRAINOR	00600 W 1ST	ORDWAY	CO	81063	7192673102	5.00	880323
WILLIAM TRAINOR	22144 ROAD U	SUGAR CITY CO		81076	7192673746	75.00	880229
VICTORINE M TRAMMELL	5442 S CEDAR ST	LITTLETON, CO		80120	7955843	25.00	880323
MR ARTHUR H TRAVERS	1050 EDINBORO DR	BOULDER, CO		80303	3034992291	25.00	880113
HELEN TRAYLOR	2352 BROADWAY	GRAND JCT	CO	81503	3032431570	40.00	880113
Connie Tregilius	33 Meadowridge Tr	Durango	CO	81301	3032595159	15.00	880210
YOLANDA L TREUDL	1705 POPLAR DR	GRAND JCT, CO		81505	2428915	10.00	880210
Thelma Trottner	1435 S Steele St	Denver	CO	80210	7777029	20.00	880229
Delores Trujillo	6800 E. Tenn Ave #412	Denver	CO	80224	3033553681	5.00	880229
Paul Trujillo	505 So Alcott Street	Denver,	CO	80219	9346643	10.00	880113
LINDA C TRZYNA	210 LEYDEN ST	DENVER, CO		80220	3033339192	7.00	880229
JENNIE A TUCKER	4431 VRAIN ST	DENVER	CO	80212	4558642	10.00	880229
MR JAMES H TURNER	00345 CLERMONT	DENVER	CO	80220	3336832	10.00	880113
MR BRUCE E TURNER	7775 S LAMAR CT	LITTLETON	CO	80123	9793582	25.00	880127
Jill Tuzick	1116 Olive St	Denver	CO	80220	3557182	25.00	880113
FRISCOLA R URR	255 TAM O SHANTER	MONUMENT, CO		80132	4813438	25.00	880309
ESTHER ULIBARRI	4495 ELM CT	DENVER	CO	80211	3034551391	25.00	880113
ALFRED ULIBARRI	2444 E 98TH WAY	DENVER	CO	80229	3034517526	10.00	880113
ANTHONY UNREIN	4995 S GRANT	ENGLEWOOD CO		80110	3037816185	25.00	880229
ROZ UPIEGRAFF	PO BOX 672	EVERGREEN	CO	80439	3036747757	25.00	880113
RENEL C UPDEGROVE	8921 W TEMPLE PL	LITTLETON	CO	80123	3039738673	15.00	880127
HARRY UVEDA	7074 WINDA CT	WESTMINSTER	CO	80030	3034273780	10.00	880127
PAUL VAPER	442 COUNTY RD 76	PARLIN CO		81239	3036410004	25.00	880113
MR ARTHUR VALADEZ	1219 KALAMATH ST	DENVER	CO	80204	8250847	25.00	880309
M M JUNE VALDEZ	1719 W 12TH	FUEBLO CO		81003	7195448145	10.00	880323
JUAN VALDEZ	2180 CHANTALA	FUEBLO CO		81006	7195446654	15.00	880323
ERNEST VALDEZ	9400 FIR DRIVE	THORNTON CO		80229	2875859	25.00	880210
JOSIE E VALDEZ	201 ORCHARD AV	GRAND JCT, CO		81501	3032438902	5.00	880113
MR CARL G VAN LANDINGHAM SR	9300 KENDALL ST	WESTMINSTER	CO	80030	4287654	15.00	880113
DAVID VANCIL	02709 REDWING RD	FT COLLINS	CO	80526	3032230462	10.00	880113
CHRISTINE Y VANCONY	7645 E. EASTMAN AVE. 308-A	DENVER, CO		80231	3036715897	10.00	880113
CHARLES VANDEBOOGAARD	626 W LILAC CT	LOUISVILLE	CO	80027	3036668818	18.00	880113
STEVEN VANDENBERG	501 13TH ST	BOULDER	CO	80302	3034479567	50.00	880113
RUTH A VANHOEN	1805 S RALEIGH ST	DENVER	CO	80219	9351822	25.00	880127
KATHY VANLIERE	11152 W OREGON PL	DENVER CO		80226	3039864171	12.00	880323
ADELINE M VANNEST	1495 S OSAGE ST	DENVER	CO	80223	7771146	10.00	880113
CATHY VAUGHAN-GRADOWSKI	1419 CYPRESS CIRCLE	LAFAYETTE	CO	80026	3036653691	5.00	880309
PATRICIA A VESTAL	1665 S WOLCOTT CT	DENVER, CO		80219	3039345249	30.00	880113
MR JOSE E VICKARELLI	02112 26TH AVE	GREELEY	CO	80631	3300884	12.00	880113
GRACE VIGAN	PO BOX 205	BYERS	CO	80103	8225232	10.00	880113
PAUL VIGIL	07417 BEACH CT	WESTMINSTER	CO	80035	4291611	5.00	880113

JANIE WHITNEY	92711 W WESLEY	DENVER	CO	80219	9352977	10.00	880113
JOANNE S WHITTON	14192 E LINVALE PL	AURORA, CO		80014	3037513765	10.00	880113
MARGARET WHITTAKER	835 URBAN ST	GOLDEN CO		80401	3032339982	15.00	880113
MARGARET WICKI LUREN	140 S BIRCH	DENVER CO		80222	3033778926	10.00	880113
MARY M WILCOX	3690 ESTES ST	WHEAT RIDGE	CO	80033	4240498	40.00	880309
SUSAN A WILDER	2767 F 174 RD	GRAND JCT	CO	81504	3032428192	10.00	880127
LORIS & LUTINE WELLE	200 WEST MAIN	ASPEN CO		81611	3039252894	50.00	880127
MR STEVEN WILLIAMS	60213 CANTRIL	CAGLE ROCK	CO	80104	3036885206	25.00	880127
WESSIE K WILLIAMS	3713 RACE ST	DENVER, CO		80205	2956802	30.00	880113
WILCHART WILLIS	1400 S COLLYER 229	LONGMONT	CO	80501	3036512274	40.00	880127
M/M BEE WILSON	4330 S DILLON ST	AURORA CO		80015	3036930565	25.00	880309
GAIL WILSON	3008 SAN LOUIS	COLO SPRINGS CO		80909	7194750220	10.00	880127
CHARLOTTE S WILSON	11 LOCUST ST	WINDSOR	CO	80550	3036862371	10.00	880210
FRYE A WILSON	12940 E 45TH AVE	DENVER, CO		80239	3033710200	20.00	880323
LEIGH WILSON	7131 E WALSH PL	DENVER, CO		80224	3033551992	20.00	880113
ROBERT WINDFARO	62955 TINDER LN	COLO SPRINGS	CO	80908	7194952381	75.00	880127
ROSE C WINDLER	4217 S CLARKSON ST	ENGLEWOOD, CO		80110	3037991723	10.00	880323
MR EARL W WINFOR	1532 S ALCOTT ST	DENVER, CO		80219	9358729	10.00	880113
ETHEL L WINTERS	1853 S ALCOTT ST	DENVER	CO	80219	9360966	25.00	880113
Don Wislon	Rt 1	Haxton	CO	80731	7747492	25.00	880210
MR JAMES WISE	12305 E 54TH AVE	DENVER	CO	80239	3033710355	20.00	880127
MR & MRS MICHAEL WITTMAN	P O BOX 1681	IDAHO SPRINGS CO		80452	3035674119	20.00	880113
MARGARET A WITWER	01914 18TH AVE	GREELEY	CO	80631	3561961	10.00	880113
MARY V WOLBERT	7520 S MARION ST	DENVER	CO	80210	7776880	10.00	880113
HERBERT WOLFE	909 E FOUTT	PUEBLO CO		81004	7195451819	5.00	880210
SUSAN WOLKERSTORFER	1211 16TH AVE	LONGMONT CO		80501	3037728236	25.00	880113
NAOMI WOLTERMATH	16 W. AVE	SEDGWICH	CO	80749	3034635762	10.00	880127
M/M F WOMMER JR	PT 1 RD 501 BOX 6601	BAYFIELD CO		81122	3038842449	20.00	880210
RUTH WOOD	P O BOX 508	NINAT CO		80544	3034446949	12.00	880127
ALICE H WOOD	P O BOX 146	PINE	CO	80470	3038384921	5.00	880113
MR CHARLES A WOODWARD	5064 UTOPIA CT	DENVER, CO		80239	3033714399	10.00	880113
MR HURCELL M WOODCOCK	190 UTE AVE, T-2	RIFLE, CO		81650	6253996	12.00	880127
GAIL WOODS	3911 TERRY LK RD	FORT COLLINS CO		90524	3034939090	5.00	880113
SHARON WOODWORTH	1425 LINCOLN PLACE	BOULDER	CO	80302	3034499874	15.00	880127
FRANCES M WORLAND	2332 HOLLY ST	DENVER, CO		80207	3220209	10.00	880127
BETTY WORLEY	2531 P ROAD	CEDAREDOGE CO		81413	3038563486	5.00	880127
ROGER WORLOCK	06341 BASELINE RD	BOULDER	CO	80303	3034943751	17.50	880113
MR OJAY H WORRELL	515 MAPLE AVE	GLENWD SPGS, CO		81601	3039455844	20.00	880113
MR ANDY WYSOWATCKY	01328 N US 287	BERTHOUD	CO	80513	3035322749	50.00	880113
Sherman Yamaguchi	4402 St Paul St	Denver	CO	80216	3032968203	50.00	880323
ANTONIA M YANCEY	6143 E OREGON PL	DENVER, CO		80224	3037571887	7.00	880113
MR JAMES R YEHLE	753-B LEFT FORK ROAD	BOULDER, CO		80302	3034499504	20.00	880127
MR AUBREY YOUNG	3344 B HICKOK DR	FORT COLLINS CO		80525	3032263766	25.00	880127
FRANCIS YOUNG	00816 PINE AVE	CANYON CITY	CO	81212	3032759354	10.00	880210
ROBERT YOUNG	P O BOX 12102	BOULDER CO		80303	3034996074	25.00	880127
MR & MRS THOMAS YOUNG	1489 JOHNSON CT	BOULDER, CO		80303	3034435097	5.00	880113
MRS BETTY ZACK	121 W 4TH AVE	DENVER CO		80223	3037786792	20.00	880113
MRS LURENZA ZAMARRIPA	132 REGENCY	PUEBLO CO		81005	7195645965	5.00	880113
MR RAPHAEL ZAPHIR	7604 E COLGATE PL	DENVER, CO		80231	3037524988	10.00	880309
MRS LOUISE F. ZARO	2533 S ONEIDA ST	DENVER, CO		80224	3037561691	25.00	880113
Anne W Zubrow	300 Bellevue Drive	Boulder	CO	80302	3034434092	35.00	880323
MR A J ZUPANCIC	231 SPRINGS ST.	PUEBLO	CO	81003	7195431763	5.00	880113
VIOLA B HILL	346 ROSEWOOD DR	FOUNTAIN, CO		80817	3033825127	20.00	880127

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BEFORE THE FEDERAL ELECTION COMMISSION

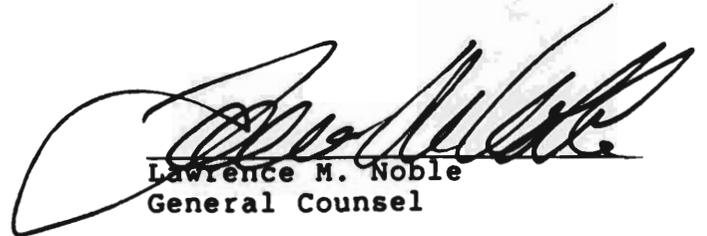
SENSITIVE

In the Matter of)	
)	
Democratic State Central)	MUR 2808
Committee (of Colorado) and)	
Paula Herzmark, as treasurer)	
)	
Gordon & Schwenkmeyer)	

GENERAL COUNSEL'S REPORT

The Office of the General Counsel is prepared to close the investigation in this matter as to the Democratic State Central Committee (of Colorado) and Paula Herzmark, as treasurer, and Gordon & Schwenkmeyer based on the assessment of the information presently available.

6/20/89
Date


Lawrence M. Noble
General Counsel

Staff Person: F. Monarski

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 26, 1989

Elizabeth J. Lentini
Davis, Graham & Stubbs
Suite 4700
307 Seventeenth Street
P.O. Box 185
Denver, CO 80201

RE: MUR 2808
Democratic State Central
Committee (of Colorado)
and Paula Herzmark, as
treasurer

Dear Ms. Lentini:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by your clients, the Democratic State Central Committee (of Colorado) (the "Committee") and Paula Herzmark, as treasurer, on January 19, 1989, the Federal Election Commission found reason to believe that your clients, the Democratic State Central Committee (of Colorado) and Paula Herzmark, as treasurer, violated 2 U.S.C. §§ 432(c), (d) and (h) and § 434(b) and 11 C.F.R. § 103.1 and instituted an investigation in this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that the Committee violated 2 U.S.C. §§ 432(h) and 434(b) and 11 C.F.R. § 103.1. The Office of the General Counsel is also prepared to recommend that the Commission find no probable cause to believe that the Committee violated 2 U.S.C. §§ 432(c) and (d).

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Elizabeth J. Lentini
Page 2

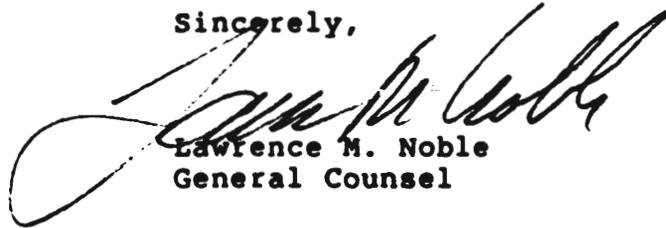
The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a 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.

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 Frania Monarski, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

000407/4804

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Democratic State Central) MUR 2808
Committee (of Colorado) and)
Paula Herzmark, as treasurer¹)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On January 19, 1989, the Commission found reason to believe that the Democratic State Central Committee (of Colorado) (the "Committee") and its treasurer, violated 2 U.S.C. §§ 432(c), (d) and (h) and 434(b) and 11 C.F.R. § 103.1 and initiated an investigation into this matter.

II. ANALYSIS

The Federal Election Campaign Act of 1971, as amended (the "Act") requires each political committee to designate one or more state banks, federally chartered depository institutions or insured depository institutions as its campaign depository. 2 U.S.C. § 432(h). Commission Regulations explain that the committee must notify the Commission of all designated depositories. 11 C.F.R. § 103.1. The committee must deposit all contributions into the depository within ten days of receipt. 11 C.F.R. § 103.3(a). Moreover, no disbursements may be made by the committee except by check drawn from the campaign depository. 2 U.S.C. § 432(h). The Commission has also determined that expenditures made by an agent of the committee must be drawn from

1. On March 15, 1989, the Democratic State Central Committee (of Colorado) filed an amended Statement of Organization, changing its treasurer from Christopher T. Gates to Paula Herzmark.

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a bank account in a depository institution designated by the committee. Advisory Opinion 1980-42.

A treasurer or his or her authorized agent must comply with certain recordkeeping requirements pursuant to the Act. 2 U.S.C. § 432(c). For a contribution in excess of \$50, a treasurer must keep an account of the name and address of the contributor, the date and the amount of the contribution. 2 U.S.C. § 432(c)(2). If a person makes contributions aggregating more than \$200 during a calendar year, the treasurer must record the identification of the person, the date and the amount of the contribution. 2 U.S.C. § 432(c)(3). Moreover, the treasurer must keep a record on any disbursement made including the name and address of the person to whom the disbursement is made, the date, the amount and the purpose of the disbursement, and the name of the candidate and the office sought by the candidate, if any, for whom the disbursement is made, including a receipt, invoice or canceled check for each disbursement over \$200. 2 U.S.C. § 432(c)(5). The Act further requires the treasurer to preserve all records and copies of the reports for three years after the reports are filed. 2 U.S.C. § 432(d).

Pursuant to the Act, a treasurer of a political party must file periodic reports indicating receipts and disbursements made during that period. 2 U.S.C. § 434. The report must contain the total amounts of all receipts from contributions made by individuals, authorized committees and political party committees. 2 U.S.C. § 434(b)(2). Moreover, the report must indicate the identification of a person who makes a contribution

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in excess of \$200 or in any lesser amount if the committee chooses, together with the date and amount of the contribution. 2 U.S.C. § 434(b)(3)(A). The treasurer must report all the disbursements made by the committee during the reporting period. 2 U.S.C. § 434(b)(4). The report must contain the name and address of each person to whom an expenditure in excess of \$200 within the calendar year is made to meet the committee's operating expenses, together with the date, amount and purpose of the operating expenditure. 2 U.S.C. § 434(b)(5).

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Gordon & Schwenkmeyer, Inc. ("G&S"), the Committee's fundraising and telemarketing agent, solicits contributions from a list of individuals provided by the Committee. This list of donors used for calling does not include any corporations, unions or individuals who in the past have contributed more than \$100 to the Committee. G&S calls the individuals on the list and requests contributions for the Committee. Individuals who pledge are sent follow up collection envelopes. The contributors mail their contributions to a post office box in Colorado.

On a weekly basis, the postmaster sends the accumulated envelopes to G&S in California. The contributions are immediately recorded and deposited into the custodial account at the Bank of Beverly Hills. It is the standard procedure of G&S to send any corporate or union contributions or individual contributions exceeding \$200 directly to the Committee. There have been no corporate or union contributions received as a result of G&S telemarketing services since June 1985, when it began providing those services.

On a monthly basis, G&S provides the Committee with a report

of itemized expenses incurred and all contributions received, including the number of calls and pledges made. G&S deducts its expenses from the custodial account and each month sends the net proceeds to the Committee. On a quarterly basis, G&S provides the Committee with a list of individual contributors from the preceding period. The Committee reviews the list to confirm that no individual exceeded the \$200 limit and needs to be reported separately. The average contribution received by G&S as a result of these fundraising activities is \$18.

G&S deposited \$25,960 in the custodial account and incurred \$15,398.66 in expenses from January 1, 1988 through March 31, 1988. On January 4, 1988, the Committee deposited \$15,000 in contributions raised by G&S into its non-federal account. On February 9, 1988, it deposited \$10,000 of such funds into its federal account and on February 26, 1988, it deposited an additional \$5,000 into its non-federal account. It appears that some of the funds that G&S forwarded to the Committee during the first quarter of 1988 were apparently recovered at the end of 1987.

G&S, as agent of of the Committee, has also been making disbursements from this custodial account to pay its telemarketing expenses. On March 15, 1989, the Committee submitted an amended Statement of Organization and listed the Bank of Beverly Hills, where G&S maintains the custodial account, as a campaign depository. Pursuant to the Act and Commission Regulations, the Committee should have designated the custodial account as a campaign depository because G&S has been making

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disbursements from the custodial account on behalf of the Committee. Such disbursements must be made from a campaign depository. 2 U.S.C. § 432(h); see Advisory Opinion 1980-42.

Therefore, there is probable cause to believe that the Committee violated 2 U.S.C. § 432(h) by failing to designate the custodial account maintained by G&S as a campaign depository in a timely manner. Moreover, there is probable cause to believe that the Committee violated 11 C.F.R. § 103.1 by failing to notify the Commission in a timely manner that the custodial account was being used as a campaign depository.

Since the account should have been listed as a campaign depository, all funds deposited into the custodial account are thus subject to the contribution prohibitions and limitations under the Act. None of the funds deposited in the custodial account included any corporate or union contributions or individual contributions in excess of \$200 during the period from January 1, 1988 through March 31, 1988. Therefore, the evidence indicates that all funds raised by G&S during this time period meet the contribution prohibitions and limitations under the Act.

In its 1988 April Quarterly Report, the Committee reported contributions, totaling \$10,000, received through the G&S solicitations. This \$10,000 appears only to represent net proceeds, rather than gross receipts. The Committee failed to report the expenses incurred by G&S. Moreover, because the custodial account should have been designated as a campaign depository, the Committee should have reported gross and net receipts, including funds which were later transferred from the

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custodial account to the non-federal account. Accordingly, the Committee failed to meet the reporting requirements of 2 U.S.C. § 434(b).

The Committee submitted a list of all the individuals who made contributions through the G&S telemarketing services from January 1, 1988 through March 31, 1988. Therefore, it appears that the Committee has complied with the recordkeeping requirements pursuant to the Act. See 2 U.S.C. §§ 432(c) and (d). Moreover, the list indicates that no individual made a contribution in excess of \$200 thereby triggering the itemization requirements of 2 U.S.C. § 434(b).

Based on the foregoing analysis, there is probable cause to believe that the Democratic State Central Committee (of Colorado) and Paula Herzmark, as treasurer, violated 2 U.S.C. § 432(h) by failing to designate the custodial account maintained by Gordon & Schwenkmeyer as a campaign depository and 11 C.F.R. § 103.1 by failing to notify the Commission of the custodial account as a campaign depository in a timely manner. Moreover, there is probable cause to believe that the Democratic State Central Committee (of Colorado) and Paula Herzmark, as treasurer, violated 2 U.S.C. § 434(b) by failing to report the gross receipts and disbursements made from the custodial account.

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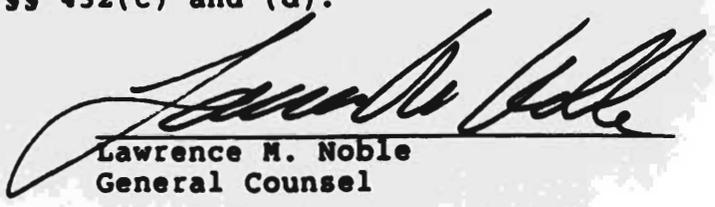
III. GENERAL COUNSEL'S RECOMMENDATIONS

1. Find probable cause to believe that the Democratic State Central Committee (of Colorado) and Paula Herzmark, as treasurer, violated 2 U.S.C. §§ 432(h) and 434(b) and 11 C.F.R. § 103.1.

2. Find no probable cause to believe that the Democratic State Central Committee (of Colorado) and Paula Herzmark, as treasurer, violated 2 U.S.C. §§ 432(c) and (d).

Date

6/23/89


Lawrence M. Noble
General Counsel

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 26, 1989

Kris Schwenkmeyer
Gordon & Schwenkmeyer, Inc.
550 N. Continental Boulevard
Suite 180
El Segundo, CA 90245

RE: MUR 2808
Gordon & Schwenkmeyer

Dear Ms. Schwenkmeyer:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by you, on January 19, 1989, the Federal Election Commission found reason to believe that Gordon & Schwenkmeyer violated 2 U.S.C. § 432(b)(2) and 11 C.F.R. § 102.8(b), and instituted an investigation in this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that violations have 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.

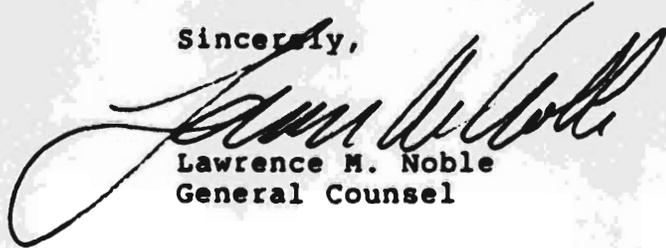
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Kris Schwenkmeyer
Page 2

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 Frania Monarski, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Gordon & Schwenkmeyer) MUR 2808

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On January 19, 1989, the Commission found reason to believe that Gordon & Schwenkmeyer, Inc. ("G&S"), the telemarketing and fundraising agent of the Democratic State Central Committee of Colorado (the "Committee"), violated 2 U.S.C. § 432(b)(2) and 11 C.F.R. § 102.8(b) and initiated an investigation into this matter.

II. ANALYSIS

The Federal Election Campaign Act of 1971, as amended (the "Act") requires any person who receives a contribution of \$50 or less on behalf of a committee which is not an authorized committee must forward that contribution to the treasurer no later than thirty days after receiving the contribution. 2 U.S.C. § 432(b)(2)(A). If the contribution is more than \$50, the agent must forward the name and address of the contributor, the contribution and the date of the receipt of the contribution, no later than ten days after receiving the contribution. 2 U.S.C. § 432(b)(2)(B). Finally, if the amount of the contribution exceeds \$200, the agent must forward the contribution, the identification of the contributor, including his or her name, address, occupation and name of his or her employer, and the date of receipt of the contribution. 11 C.F.R. § 102.8(b)(2). The date of receipt refers to the date that the

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agent obtains possession of the contribution. Id. The Commission has also determined that the forwarding and depositing requirements outlined above are met when a fundraising agent, acting on behalf of the committee, deposits contributions in an account maintained by the agent that is a campaign depository. The agent, however, must still fulfill the recordkeeping duties required by the Act and Commission Regulations. Advisory Opinion 1980-42.

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G&S solicits contributions from a list of individuals provided by the Committee. This list of donors used for calling does not include any corporations, unions or individuals who in the past have contributed more than \$100 to the Committee. G&S calls the individuals on the list and requests contributions for the Committee. Individuals who pledge are sent follow up collection envelopes. The contributors mail their contributions to a post office box in Colorado. On a weekly basis, the postmaster sends the accumulated envelopes to G&S in California. The contributions are immediately recorded and deposited into the custodial account at the Bank of Beverly Hills.

On a monthly basis, G&S provides the Committee with a report of itemized expenses incurred and all contributions received, including the number of calls and pledges made. G&S deducts its expenses from the custodial account and sends the net proceeds to the Committee. On a quarterly basis, G&S provides the Committee with a list of individual contributors from the preceding period. The average contribution received by G&S as a result of these fundraising activities is \$18.

G&S deposited \$25,960 in the custodial account and incurred \$15,398.66 in expenses from January 1, 1988 through March 31, 1988. On January 4, 1988, the Committee deposited \$15,000 in contributions raised by G&S into its non-federal account. On February 9, 1988, it deposited \$10,000 of such funds into its federal account and on February 26, 1988, it deposited an additional \$5,000 into its non-federal account. It appears that some of the funds that G&S forwarded to the Committee during the first quarter of 1988 were apparently recovered at the end of 1987.

G&S, as agent of of the Committee, has been making disbursements from this custodial account to pay its telemarketing expenses. On March 15, 1989, the Committee submitted an amended Statement of Organization and listed the Bank of Beverly Hills, where G&S maintains the custodial account, as a campaign depository. Because the custodial account functioned as a campaign depository, G&S was required to meet the thirty day rule of 2 U.S.C. § 432(b)(2) with respect to depositing contributions into this account. G&S submitted a chart indicating that it deposited the contributions into the custodial account within one to three days of receiving them. Therefore, because the Commission, in Advisory Opinion 1980-42, determined that the forwarding and depositing requirements are met when a fundraising agent, acting on behalf of the committee, deposits contributions in an account maintained as a campaign depository by the agent, it appears that G&S deposited the contributions in the custodial account within the required time

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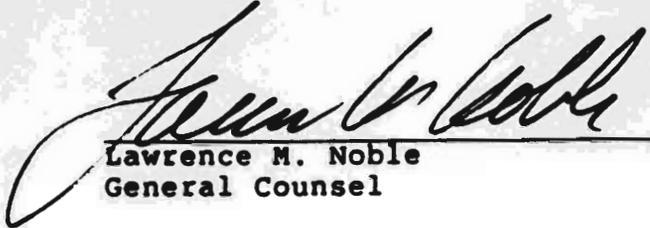
frame of 2 U.S.C. § 432(b)(2). Accordingly, there is no probable cause to believe that Gordon & Schwenkmeyer violated 2 U.S.C. § 432(b)(2) and 11 C.F.R. § 102.8(b) by failing to meet the forwarding requirements.

III. GENERAL COUNSEL'S RECOMMENDATIONS

1. Find no probable cause to believe that Gordon & Schwenkmeyer violated 2 U.S.C. § 432(b)(2) and 11 C.F.R. § 102.8(b).

6/23/87

Date



Lawrence M. Noble
General Counsel

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DAVIS, GRAHAM & STUBBS
ATTORNEYS AT LAW

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TELEPHONE 303-638-6600 TELEFAX 303-638-6600
TELEPHONE 303-693-1700 TELEFAX 303-693-1700

ELIZABETH J. LENTINI
AEB-7488

July 12, 1989

By Telecopy

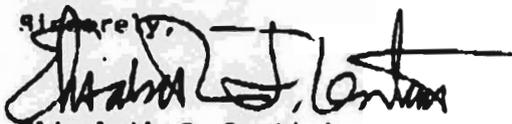
Ms. Franja Monarski
Federal Election Commission
Washington, D.C. 20463

Re: MUR 2808

Dear Ms. Monarski:

As we discussed this morning, I am hereby requesting an extension of seven days, from July 17 to July 24, for the submission of a written brief in response to the brief of the General Counsel relating to the referenced MUR. I am requesting the extension because my workload of other matters has and will continue to prevent me from meeting the July 17 deadline.

Please don't hesitate to call me if you have any questions or wish to discuss this request further.

Sincerely,

Elizabeth J. Lentini

cc: Trent Hager
Richard Daily

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK
89 JUL 13 AM 5:11

000407498



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 14, 1989

Elizabeth J. Lentini, Esq.
Davis, Graham & Stubbs
Suite 4700
307 Seventeenth Street
P.O. Box 185
Denver, CO 80201

RE: MUR 2808
Democratic State Central
Committee (of Colorado)
and Paula Herzmark, as
treasurer

Dear Ms. Lentini:

This is in response to your letter dated July 12, 1989, which we received on July 12, 1989, requesting an extension of 7 days until July 24, 1989 to respond to MUR 2808. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on July 24, 1989.

If you have any questions, please contact Frania Monarski, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

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FEDERAL ELECTION COMMISSION
MAIL ROOM

DAVIS, GRAHAM & STUBBS

ATTORNEYS AT LAW

09 JUL 21 AM 10:14

WASHINGTON D.C. OFFICE
SUITE 500
1200 NINETEENTH STREET, N.W.
WASHINGTON, D.C. 20036-2402
TELEPHONE 202-822-8660

SUITE 4700
370 SEVENTEENTH STREET
DENVER, COLORADO 80202

SALT LAKE CITY OFFICE

SUITE 1600-87
EAGLE GATE TOWER
60 EAST SOUTH TEMPLE
SALT LAKE CITY, UTAH 84111-1006
TELEPHONE 801-328-6000

MAILING ADDRESS
POST OFFICE BOX 188

DENVER, COLORADO 80201-0188

TELEPHONE 303-892-9400 TELELEX 240481 DGS DVR
TELECOPIER 303-893-1379 CABLE DAVGRAM, DENVER

ELIZABETH J. LENTINI
892-7468

July 20, 1989

By Federal Express

Commission Secretary
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

09 JUL 21 PM 1:00

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE
GENERAL COUNSEL

RE: MUR 2808
Democratic State Central Committee
(of Colorado) and Paula Herzmark, as
treasurer

Dear Sir or Madam;

Enclosed please find ten copies of the Response to
General Counsel's Brief hereby filed by the Democratic State
Central Committee of the State of Colorado in connection with the
referenced MUR, pursuant to 11. C.F.R. section 111.16(c).

The Committee hereby requests pre-probable cause
conciliation, pursuant to 11 C.F.R. section 111.18(d). A draft
conciliation agreement will be forwarded at our earliest
convenience.

Very truly yours,

Elizabeth J. Lentini

cc: General Counsel (w/3 copies of enclosure) ✓

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Democratic State Central) MUR 2808
Committee (of Colorado))
and Paula Herzmark, as)
treasurer)

RESPONSE TO GENERAL COUNSEL'S BRIEF

1. The General Counsel asserts that the Committee failed to designate the custodial account maintained by Gordon & Schwenkmeyer, Inc. as a campaign depository in a timely manner, pursuant to 2 U.S.C. section 432(h) and 11 C.F.R. section 103.1.

9004074311
The Democratic State Central Committee of Colorado (the "Committee") does not dispute the proposition of the General Counsel that it failed to designate the custodial account maintained by Gordon & Schwenkmeyer, Inc. ("G&S") in a timely manner. However, the Committee did act promptly to designate the G&S account after it became aware of its responsibility to do so. It became aware of its responsibility to designate the custodial account through the Commission's interrogatories received in early February. The Committee designated the custodial account on March 15, 1989, little more than a month later.

There is no evidence of any violation other than an inadvertent omission to timely designate the custodial account as a depository.

2. The General Counsel asserts that the Committee failed to report the gross receipts and disbursements made from the custodial account pursuant to 2 U.S.C. section 434(b).

The Committee has substantially complied with its disclosure obligations under the Act. In light of this substantial compliance, no further Commission action is warranted.

Although the Committee did not set forth specific total gross receipts and total gross expenses numbers in its April 15, 1988 Quarterly Report (the "Report"), Schedule A to the Report as originally filed consists of eight pages of information concerning G&S and the custodial account (including monthly expense and receipt summaries) from which such figures can be derived by adding together the receipts and expenses for the appropriate months. The Report, including Schedule A, is attached as Exhibit A hereto. In its first amendment to the Report (attached as Exhibit B hereto), filed on November 7, 1988, the Committee formalized its reporting of gross expenses, by showing gross expenses paid to G&S on Schedule B, line A of the amendment.

Therefore, with respect to the disclosure of gross receipts and gross expenses information, the Committee has disclosed what it considered to be all of the necessary and relevant information to the Federal Election Commission. The Committee's only mistake was in not reporting the proper totals, which occurred because it did not understand exactly how such information should be formally presented in its reports. Once it

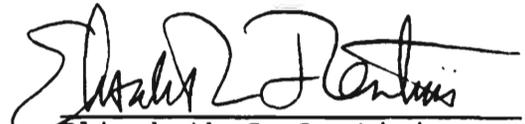
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2

understood how the information should be presented, the Committee amended the Report accordingly.

The General Counsel's brief states, at page 5, that "In its 1988 April Quarterly Report, the Committee reported contributions, totaling \$10,000, received through the G&S solicitations. This \$10,000 appears only to represent net proceeds, rather than gross receipts." (emphasis added)

This statement is not accurate. The \$10,000 represents that portion of the net proceeds attributable to the G&S custodial account which were transferred to the Committee's federal account (the balance of the net proceeds having been transferred to the Committee's non-federal (operating) account). At the time this Report was filed, the Committee did not understand it was required to report all receipts attributable to the custodial account, rather than simply those receipts transferred to the Committee's federal account. This error was corrected in the Committee's second amendment to the Report, dated July 19, 1989, a copy of which is attached hereto as Exhibit C. Line 6(c) of the Summary Page and line 11(a)(ii) of the Detailed Summary Page now show total receipts from the custodial account before disbursements were made to the non-federal (operating) account. Line C on Schedule B ("Itemized Disbursements") now shows the transfer of receipts from the custodial account to the non-federal (operating) account.

DATE: July 20, 1989


Elizabeth J. Lentini
370 Seventeenth Street
Suite 4700
Denver, Colorado 80202
(303) 892-7465

000407/4913

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

FEC FORM 3X (REVISED 4/87)

APR 25 11 9:29

TYPE OR PRINT

00161786 030788
CHRISTOPHER T GATES
DEMOCRATIC STATE CENTRAL COMMITTEE
PO BOX 300338
DENVER CO 80203

2. FIDUCIARY NUMBER

3. This committee qualified as a noncandidate committee during this reporting period on _____ (date)

4. TYPE OF REPORT

(a) April 15 Quarterly Report

July 15 Quarterly Report

October 15 Quarterly Report

January 31 Year End Report

July 31 Mid Year Report (Non-election Year Only)

Termination Report

Monthly Report Due On:

- | | | |
|--------------------------------------|---------------------------------------|--------------------------------------|
| <input type="checkbox"/> February 29 | <input type="checkbox"/> June 29 | <input type="checkbox"/> October 29 |
| <input type="checkbox"/> March 29 | <input type="checkbox"/> July 29 | <input type="checkbox"/> November 29 |
| <input type="checkbox"/> April 29 | <input type="checkbox"/> August 29 | <input type="checkbox"/> December 29 |
| <input type="checkbox"/> May 29 | <input type="checkbox"/> September 29 | <input type="checkbox"/> January 31 |

Tenth day report preceding _____ (Type of Election)

election on _____ in the State of _____

Tenth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? YES NO

SUMMARY

Covering Period Jan 1, 1988 through April 30, 1988

COLUMN A
This Period

COLUMN B
Calendar Year-to-Date

(a) Cash on Hand January 1, 19 <u>88</u>		\$ 283.00
(b) Cash on Hand at Beginning of Reporting Period	\$ 283.00	
(c) Total Receipts (from Line 18)	\$ 10,055.38	\$ 10,055.38
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 10,338.38	\$ 10,338.38
7 Total Disbursements (from Line 28)	\$ 9,770.30	\$ 9,770.30
8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 568.08	\$ 568.08
9 Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$	
10 Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 46,771.86	

For further information contact:
Federal Election Commission
988 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

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

Signature of Treasurer

Date

4/21/88

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

FEC FORM 3X
(revised 4/87)

DETAILED SUMMARY PAGE

of Receipts and Disbursements
(Page 2, FEC FORM 30)

Name of Committee (in full)	Report Covering the Period	
Democratic State Central Committee	From: Jan 1, 1986	To: April 30, 1988
I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
11 CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(i) Borrowed (use Schedule A)	10,000.00	10,000.00
(ii) Unitemized		
(iii) Total of contributions from individuals		
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)		
(d) TOTAL CONTRIBUTIONS (add 11(a)(i), (b), and (c))	10,000.00	10,000.00
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		
13 ALL LOANS RECEIVED		
14 LOAN REPAYMENTS RECEIVED		
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
17. OTHER RECEIPTS (Dividends, Interest, etc.) .55.38		
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	10,055.38	10,055.38
II. DISBURSEMENTS		
19. OPERATING EXPENDITURES	289.84	289.84
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
22. INDEPENDENT EXPENDITURES (use Schedule E)		
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)		
24. LOAN REPAYMENTS MADE	9,468.46	9,468.46
25. LOANS MADE		
26. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees		
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)		
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))		
27. OTHER DISBURSEMENTS 12.00	12.00	12.00
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	9,770.30	9,770.30
III. NET CONTRIBUTIONS OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))	10,000.00	10,000.00
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	-0-	-0-
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)	10,000.00	10,000.00
32. TOTAL OPERATING EXPENDITURES (from Line 19)	289.84	289.84
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)	-0-	-0-
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)	289.84	289.84

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedules for each category of the Detailed Summary Page

PAGE
PAGE LINE #

Any information omitted from such Reports and Statements may not be used by any person for the purpose of obtaining contributions or for any purpose, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Democratic State Central Committee

<p>A. Full Name, Mailing Address and ZIP Code Gordon and Schwenkayyer 5751 Uplander Way Culver City, CA 90230</p>	<p>Name of Employer * See attached explanation</p>	<p>Date (month, day, year) 2/9/88</p>	<p>Amount - Receipt # 10,00</p>
<p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Aggregate Year-to-Date > \$10,000.00</p>		
<p>B. Full Name, Mailing Address and ZIP Code</p>	<p>Name of Employer</p>	<p>Date (month, day, year)</p>	<p>Amount - Receipt #</p>
<p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Aggregate Year-to-Date > \$</p>		
<p>C. Full Name, Mailing Address and ZIP Code</p>	<p>Name of Employer</p>	<p>Date (month, day, year)</p>	<p>Amount - Receipt #</p>
<p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Aggregate Year-to-Date > \$</p>		
<p>D. Full Name, Mailing Address and ZIP Code</p>	<p>Name of Employer</p>	<p>Date (month, day, year)</p>	<p>Amount - Receipt #</p>
<p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Aggregate Year-to-Date > \$</p>		
<p>E. Full Name, Mailing Address and ZIP Code</p>	<p>Name of Employer</p>	<p>Date (month, day, year)</p>	<p>Amount - Receipt #</p>
<p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Aggregate Year-to-Date > \$</p>		
<p>F. Full Name, Mailing Address and ZIP Code</p>	<p>Name of Employer</p>	<p>Date (month, day, year)</p>	<p>Amount - Receipt #</p>
<p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Aggregate Year-to-Date > \$</p>		
<p>G. Full Name, Mailing Address and ZIP Code</p>	<p>Name of Employer</p>	<p>Date (month, day, year)</p>	<p>Amount - Receipt #</p>
<p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Aggregate Year-to-Date > \$</p>		
<p>SUBTOTAL of Rec. on This Page (optional)</p>			
<p>TOTAL This Period (fill page the line number only)</p>			<p>10,0</p>

DEMOCRATS

Democratic Party

• **Schedule A "Itemized Receipts"**

Explanation of receipt from Gordon and Schwenkmeier

1. **Monthly Expense summary from Gordon and Schwenkmeier**
2. **Return Summaries from Gordon and Schwenkmeier**
3. **Explanation of custodial account at Gordon and Schwenkmeier**

9 8 0 3 5 2 3 3 0 1 0

DEMOCRATIC PARTY
1100 ...
WASHINGTON, D.C. 20004

DEMOCRATIC PARTY
1100 ...
WASHINGTON, D.C. 20004

**GORDON ^{and}
SCHWENKMEYER**

COLORADO DEMOCRATIC PARTY NOVEMBER EXPENSE SUMMARY

GORDON AND SCHWENKMEYER FEES	2,991 attempts at .55¢ per attempt.	1,645.05
	4,006 attempts at .37¢ per attempt.	1,482.22
PHONE CHARGES	7,446 minutes at .20¢ per minute.	1,489.20
PRINTING	First billing - 1,707	256.05
	Second billing - 738	110.70
POSTAGE	First billing - 1,707	375.54
	Second billing - 738	162.36
COMPUTER LABOR	5.91 hours at \$75 per hour.	443.57
DATA ENTRY	4 hours at \$12 per hour.	48.00
COMPUTER PAPER	637 pages at .05¢ per page.	31.85
MISCELLANEOUS	Shipments.	69.45
TOTAL MONTHLY EXPENSES		\$6,113.99

**GORDON &
SCHWENKMEYER**

COLORADO DEMOCRATIC PARTY NOVEMBER RETURNS SUMMARY

<u>DATE</u>	<u>RETURNS</u>	<u>DOLLARS RETURNED</u>	<u>AV. R</u>
11/5	168	2,798.00	16
11/20	186	2,856.00	15

8 3 0 3 5 2 3 3 0 1 2

**GORDON
SCHWENKMEYER**

COLORADO DEMOCRATIC PARTY DECEMBER EXPENSE SUMMARY

GORDON AND SCHWENKMEYER FEES	4,421 attempts at .55¢ per attempt.	2,431.00
	9,734 attempts at .37¢ per attempt.	3,601.00
PHONE CHARGES	9,004 minutes at .20¢ per minute.	1,800.80
PRINTING	First billing - 2,160	324.00
	Second billing - 1,298	194.70
	Third billing - 576	86.40
POSTAGE	First billing - 2,160	475.00
	Second billing - 1,298	285.00
	Third billing - 576	126.00
COMPUTER		685.00
DATA ENTRY	12.5 hours at \$12 per hour.	150.00
COMPUTER PAPER	425 pages at .05¢ per page.	21.25
MISCELLANEOUS	Shipments.	88.00
TOTAL MONTHLY EXPENSES		\$10,271.00

GORDON & SCHWENKMEYER

COLORADO DEMOCRATIC PARTY DECEMBER RETURN SUMMARY

<u>DATE</u>	<u>RETURNS</u>	<u>DOLLARS RETURNED</u>	<u>AV. RETURN</u>
12/3	142	2,549.00	17.95
12/17	792	13,236.00	16.71
12/29	653	11,125.00	17.03

38735233014

**GARDON and
SCHWENKMEYER**

COLORADO DEMOCRATIC PARTY JANUARY 1988 MONTHLY EXPENSE SUMMARY

PRINTING	2nd billing - 695	104.25
	3rd billing - 320	40.00
POSTAGE	2nd billing - 695	152.90
	Thrid billing - 320	70.40
COMPUTER		16.63
MISCELLANEOUS	Shipments.	120.25
	TOTAL MONTHLY EXPENSES:	\$512.43

9325213013

**GORDON
SCHWENKMEYER**

COLORADO DEMOCRATIC PARTY JANUARY 1988 RETURN SUMMARY

<u>DATE</u>	<u>RETURNS</u>	<u>DOLLARS RETURNED</u>	<u>AV. RETURN</u>
1/13	716	12,588.00	17.58
1/27	284	4,530.00	15.95

98735233017

account;

(a) Pay from GSI funds the following expenses of the program:

- (1) Costs of insurance, accountants and other professional services, including insurance sufficient to cover any loss of CDP's records.
- (2) Salaries and expenses for all employees necessary for preparing reports and mailing out pledge statements for the first billing. If additional billings are decided upon, the fee will be negotiated at that time.
- (3) Salary and expenses of phone bank coordinators to supervise the daily activities of the fundraising efforts.
- (4) All costs of advertising for, and hiring of phone solicitors and other necessary employees.
- (5) Costs of training sessions for supervisors and phone solicitors.
- (6) Costs of supervising the mailing, printing, and preparation of all printed materials.
- (7) Costs of supervising the collection and transfer to GSI headquarters of contributions to the program.
- (8) Costs of setting up the phone bank.
- (9) Costs of operating the GSI headquarters.
- (10) Any other costs necessary for GSI to carry out its responsibilities under this Agreement;

(o) Prepare a financial statement every 30 days,

000407/4925
93755233019

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedules for each category of the Detailed Summary Page

PAGE OF
FOR LINE NUMBER
28

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes other than using the name and address of any political committee to solicit contributions from such committee

NAME OF COMMITTEE (in Full)

Democratic State Central Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A.R. Hirschfeld Press 5200 Smith Road Denver, CO 80216	Repay debt Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	2/10/88	2,000.00
B. Full Name, Mailing Address and ZIP Code Ridder/Braden Union Station #210 Denver, CO 80202	Repay debt Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	2/10/88	2,522.17
C. Full Name, Mailing Address and ZIP Code Harte/Hanks 400 Quivas Denver, CO 80217	Repay debt Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	2/10/88	946.29
D. Full Name, Mailing Address and ZIP Code Colo Demo Party Operating Account P.O. Box 300338 Denver, CO 80203	Repay debt Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	2/10/88	4,000.00
E. Full Name, Mailing Address and ZIP Code Colo Demo Party Operating Act P.O. Box 300338 Denver, CO 80203	Administrative Expense Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3/30/88	289.84
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (all disbursements on this page)			9,758.30

SCHEDULE D
(Revised 3/83)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 1 of 1 for
LINE NUMBER _____
(Use separate schedules
for each numbered line)

Name of Debtor (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payments This Period	Outstanding Balance at Close of This Period
Democratic State Central Committee				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor A.B. Hirschfeld Press 5200 Smith Road Denver, CO 80216	8,135.86	-0-	2,000.00	6,135.86
Nature of Debt (Purpose): Print flyers "Volunteer activity".				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Ridder/Braden Union Station #210 Denver, CO 80202	2,522.17	-0-	2,522.17	-0-
Nature of Debt (Purpose): 15: Fed share consultant services				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Harte/Hanks 400 Quivas Denver, CO 80217	946.29	-0-	946.29	-0-
Nature of Debt (Purpose): 15: Fed share mailing services				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Colo Demo Party P.O. Box 300338 Denver, CO 80203	44,636.00	-0-	4,000.00	40,636.00
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1. SEAT TAXES (attach this page last only)				
2. FINANCIAL INSTITUTIONS (attach this page last only)				
3. STATE AND LOCAL TAXES (attach this page last only)				
4. UNPAID TAXES (attach this page last only)				
5. OTHER (attach this page last only)				
				46,771.86

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION

08 NOV -7 AM 9:46

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Democratic State Central Committee		2. FEC IDENTIFICATION NUMBER C 00161786
ADDRESS (number and street) <input checked="" type="checkbox"/> Check if different than previously reported PO Box 300338		
CITY, STATE and ZIP CODE Denver, CO 80203		
		3. <input type="checkbox"/> This committee qualified as a multicandidate committee BUSINESS THIS Reporting Period on _____ (date)

4. TYPE OF REPORT

- (a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Termination Report
- Monthly Report Due On
 February 20 June 20 October 20
 March 20 July 20 November 20
 April 20 August 20 December 20
 May 20 September 20 January 31
- 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 _____
- (b) Is this Report an Amendment? YES NO

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>Jan 1, 1988</u> through <u>March 30, 1988</u>		
6. (a) Cash on Hand January 1, 1988		\$ 283.00
b. Cash on Hand at Beginning of Reporting Period	\$ 283.00	
c. Total Receipts (from Line 18)	\$ 28,231.42	\$ 28,231.42
d. Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 28,514.42	\$ 28,514.42
7. Total Disbursements (from Line 28)	\$ 27,946.34	\$ 27,946.34
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 568.08	\$ 568.08
9. Debts and Obligations Owed TO the Committee (itemize a) on Schedule C and/or Schedule D)	\$	
10. Debts and Obligations Owed BY the Committee (itemize a) on Schedule C and/or Schedule D)	\$ 46,771.86	

For further information contact:
Federal Election Commission
999 E Street NW
Washington DC 20543
Tel: Free 800 424 9633
Local: 202 376 3122

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:
Christopher T. Gates

Signature of Treasurer:



11/2/88

A false statement of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of U.S.C. §417c.

FEC FORM 3X

revised 4-

DETAILED SUMMARY PAGE

of Receipts and Disbursements
(Page 2, FEC FORM 310)

Name of Committee (in full)	Report Covering the Period	
Democratic State Central Committee C 00161786	From Jan 1, 1988	To March 30, 1988
I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
11 CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A)	\$ -0-	-0-
(ii) Unitemized	28,176.04	28,176.04
(iii) Total of contributions from individuals	-0-	-0-
(b) Political Party Committees	-0-	-0-
(c) Other Political Committees (such as PACs)	-0-	-0-
(d) TOTAL CONTRIBUTIONS (add 11(a)(i), (b), and (c))	28,176.04	28,176.04
12 TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-
13 ALL LOANS RECEIVED	-0-	-0-
14 LOAN REPAYMENTS RECEIVED	-0-	-0-
15 OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	-0-	-0-
16 REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-
17 OTHER RECEIPTS (Dividends, Interest, etc.)	55.38	55.38
18 TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	28,231.42	28,231.42
II. DISBURSEMENTS		
19 OPERATING EXPENDITURES	18,465.88	18,465.88
20 TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-
21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-
22 INDEPENDENT EXPENDITURES (use Schedule E)	-0-	-0-
23 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES 2 U.S.C. 441a(d) (use Schedule F)	-0-	-0-
24 LOAN REPAYMENTS MADE	9,468.46	9,468.46
25 LOANS MADE	-0-	-0-
26 REFUNDS OF CONTRIBUTIONS TO		
a. Individuals/Persons Other Than Political Committees	-0-	-0-
b. Political Party Committees	-0-	-0-
c. Other Political Committees (such as PACs)	-0-	-0-
d. TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))	-0-	-0-
27 OTHER DISBURSEMENTS Bank charges	12.00	12.00
28 TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d), and 27)	27,946.34	27,946.34
III. NET CONTRIBUTIONS OPERATING EXPENDITURES		
29 TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))	28,176.04	28,176.04
30 TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	-0-	-0-
31 NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)	28,176.04	28,176.04
32 TOTAL OPERATING EXPENDITURES (from Line 19)	18,465.88	18,465.88
33 OFFSETS TO OPERATING EXPENDITURES (from Line 15)	-0-	-0-
34 NET OPERATING EXPENDITURES (subtract Line 33 from 32)	18,465.88	18,465.88

3 3 T 31 30674 / 4 5 d 7 7

SCHEDULE B

ITEMIZED DISBURSEMENTS

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of collecting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full) **Democratic State Central Committee** C 00161786

8 7 7 3 5 6 7 4 4 5 2 1 1

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
AB Hirschfeld Press 5200 Smith Road Denver, CO 80216	Repay debt Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	2/10/88	\$ 2,000.00
B. Full Name, Mailing Address and ZIP Code Ridder/Bradon Union Station #210 Denver, CO 80202	Repay debt Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	2/10/88	2,522.17
C. Full Name, Mailing Address and ZIP Code Hart/Hanks 400 Quivas Denver, CO 80217	Repay debt Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	2/10/88	946.29
D. Full Name, Mailing Address and ZIP Code Colorado Democratic Party Operating Account P.O. Box 300338 Denver, CO 80203	Repay debt Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	2/10/88	4000.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL (of Disbursements This Page) 301.00	
TOTAL THIS PAGE 9468.46	

DETAILED SUMMARY PAGE

of Receipts and Disbursements
(Page 2, FEC FORM 3X)

Amended 7/19/89

Name of Committee (in full)	C 00161786	Report Covering the Period		
Democratic State Central Committee		From: Jan 1, 1988	To: March 30, 1988	
I. RECEIPTS		COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
11. CONTRIBUTIONS (other than loans) FROM:				
(a) Individuals/Persons Other Than Political Committees				
(i) Itemized (use Schedule A)		\$ 48,176.04	\$ 48,176.04	11(a)
(ii) Unitemized		-0-	-0-	11(a)
(iii) Total of contributions from individuals		-0-	-0-	11(a)
(b) Political Party Committees		-0-	-0-	11(b)
(c) Other Political Committees (such as PACs)		-0-	-0-	11(c)
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))		48,176.04	48,176.04	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		-0-	-0-	12
13. ALL LOANS RECEIVED		-0-	-0-	13
14. LOAN REPAYMENTS RECEIVED		-0-	-0-	14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		-0-	-0-	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		-0-	-0-	16
17. OTHER RECEIPTS (Dividends, Interest, etc.) Interest		55.38	55.38	17
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)		48,231.42	48,231.42	18
II. DISBURSEMENTS				
19. OPERATING EXPENDITURES		38,465.88	38,465.88	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		-0-	-0-	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		-0-	-0-	21
22. INDEPENDENT EXPENDITURES (use Schedule E)		-0-	-0-	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)		-0-	-0-	23
24. LOAN REPAYMENTS MADE		9,468.46	9,468.46	24
25. LOANS MADE		-0-	-0-	25
26. REFUNDS OF CONTRIBUTIONS TO				
(a) Individuals/Persons Other Than Political Committees		-0-	-0-	26(a)
(b) Political Party Committees		-0-	-0-	26(b)
(c) Other Political Committees (such as PACs)		-0-	-0-	26(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))		-0-	-0-	26(d)
27. OTHER DISBURSEMENTS Bank charges		12.00	12.00	27
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)		47,946.34	47,946.34	28
III. NET CONTRIBUTIONS OPERATING EXPENDITURES				
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))		48,176.04	48,176.04	29
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))		-0-	-0-	30
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)		48,176.04	48,176.04	31
32. TOTAL OPERATING EXPENDITURES (from Line 19)		38,465.88	38,465.88	32
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)		-0-	-0-	33
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)		38,465.88	38,465.88	34

2004071932

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Democratic State Central Committee		2. FEC IDENTIFICATION NUMBER C 00161786
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported PO Box 300338		
CITY, STATE and ZIP CODE Denver, CO 80203		
3. <input type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date)		

4. TYPE OF REPORT

- (a) April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Non-election Year Only)
- Termination Report
- Monthly Report Due On:
- | | | |
|--------------------------------------|---------------------------------------|--------------------------------------|
| <input type="checkbox"/> February 20 | <input type="checkbox"/> June 20 | <input type="checkbox"/> October 20 |
| <input type="checkbox"/> March 20 | <input type="checkbox"/> July 20 | <input type="checkbox"/> November 20 |
| <input type="checkbox"/> April 20 | <input type="checkbox"/> August 20 | <input type="checkbox"/> December 20 |
| <input type="checkbox"/> May 20 | <input type="checkbox"/> September 20 | <input type="checkbox"/> January 31 |
- 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 _____

(b) Is this Report an Amendment? YES NO 7/19/89

SUMMARY

6. Covering Period <u>Jan 1, 1988</u> through <u>March 30, 1988</u>		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a)	Cash on Hand January 1, 19 <u>88</u>		\$ 283.00
(b)	Cash on Hand at Beginning of Reporting Period	\$ 283.00	
(c)	Total Receipts (from Line 18)	\$ 48,231.42	\$ 48,231.42
(d)	Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 48,514.42	\$ 48,514.42
7	Total Disbursements (from Line 28)	\$ 47,946.34	\$ 47,946.34
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 568.08	\$ 568.08
9	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10.	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 6,771.86	

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

Trent J. Hager, Agent for Paula Herzmark, Treasurer

Signature of Treasurer

EXHIBIT C

Date

7-19-89

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

FEC FORM 27

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Amended 7/19/89

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1

FOR LINE NUMBER 19

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Democratic State Central Committee C 00161786

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Gordon & Schwenkmeyer 5751 Uplander Way Culver City, CA 90230	Telemarketing Services Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify)	2/9/88	\$18,176.04
B. Full Name, Mailing Address and ZIP Code Colorado Democratic Party PO Box 300338 Denver, CO 80203	Reimburse Administrative Expenses Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify)	3/30/88	289.84
C. Full Name, Mailing Address and ZIP Code Colorado Democratic Party Operating Account PO Box 300338 Denver, CO 80203	Transfer out Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify)	1/4/88 2/26/88	15,000.00 5,000.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

\$ 38,465.88

00040774934

SENSITIVE

EXECUTIVE SESSION

BEFORE THE FEDERAL ELECTION COMMISSION

AUG 22 1989

In the Matter of)	
)	
Democratic State Central)	MUR 2808
Committee (of Colorado) and)	
Paula Herzmark, as treasurer ¹)	
)	
Gordon & Schwenkmeyer)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On January 19, 1989, the Commission found reason to believe that the Democratic State Central Committee (of Colorado) (the "Committee") and its treasurer violated 2 U.S.C. §§ 432(c), (d) and (h) and 434(b) and 11 C.F.R. § 103.1. On that same date, the Commission also found that Gordon & Schwenkmeyer, Inc. ("G&S"), the Committee's telemarketing and fundraising agent, violated 2 U.S.C. § 432(b)(2) and 11 C.F.R. § 102.8(b). The Commission subsequently initiated an investigation into this matter.

On February 21, 1989, G&S submitted answers to interrogatories sent by the Commission. On March 9, 1989, the Committee filed a response to the Commission's findings and on March 20, 1989, the Committee submitted supplemental information to its response. On June 26, 1989, this Office sent a copy of the General Counsel's Brief to the Committee recommending probable cause to believe that the Committee violated 2 U.S.C. §§ 432(h) and 434(b) and 11 C.F.R. § 103.1. and no probable cause to believe that the Committee violated 2 U.S.C. §§ 432(c) and

1. On March 15, 1989, the Democratic State Central Committee (of Colorado) filed an amended Statement of Organization, changing its treasurer from Christopher T. Gates to Paula Herzmark.

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(d). This Office also forwarded a copy of the General Counsel's Brief to G&S recommending no probable cause to believe that G&S violated 2 U.S.C. § 432(b)(2) and 11 C.F.R. § 102.8(b). On July 21, 1989, the Committee submitted a reply brief² to this Office. At this time, G&S failed to file a reply brief.

II. ANALYSIS

This Office relies on the legal analysis set forth in the General Counsel's Brief of June 26, 1989. In its reply brief, the Committee does not dispute the Commission's finding that it failed to designate the custodial account, maintained by G&S, as a campaign depository in a timely manner. The Committee argues, however, that once the Commission notified the Committee that it was required to designate the custodial account, the Committee promptly submitted an amended Statement of Organization on March 15, 1989. Reply Brief at 1.

According to the General Counsel's Brief, G&S performs fundraising and telemarketing services for the Committee. G&S deposited \$25,960 in the custodial account and incurred \$15,398.66 in expenses from January 1, 1988 through March 31, 1988. On January 4, 1988, the Committee deposited \$15,000 in contributions raised by G&S into its non-federal account. On February 9, 1988, it deposited \$10,000 of such funds into its federal account and on February 26, 1988, it deposited an additional \$5,000 into its non-federal account. It appears that

2. In its reply brief, the Committee requested pre-probable cause conciliation. This request, however, is inappropriate at this stage of the enforcement process.

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some of the funds that G&S forwarded to the Committee during the first quarter of 1988 were apparently received at the end of 1987.

G&S, as agent of the Committee, has been making disbursements from this custodial account to pay its telemarketing expenses. Such disbursements must be made from a campaign depository. 2 U.S.C. § 432(h); see Advisory Opinion 1980-42. Therefore, the Committee should have designated the custodial account as a campaign depository when G&S began to deposit contributions and make disbursements from the account. The Committee did designate the custodial account as a campaign depository over a year after the activity began and after notification from the Commission. Although this evidence may be considered as mitigating in computing the civil penalty, the Committee still violated 2 U.S.C. § 432(h) by failing to designate the custodial account maintained by G&S as a campaign depository and 11 C.F.R. § 103.1 by failing to notify the Commission of the custodial account as a campaign depository in a timely manner. Therefore, this Office recommends that the Commission find probable cause to believe that the Democratic State Central Committee (of Colorado) and Paula Herzmark, as treasurer, violated 2 U.S.C. § 432(h) and 11 C.F.R. § 103.1.

The General Counsel's Brief also recommended that the Commission find probable cause to believe that the Committee violated 2 U.S.C. § 434(b) by failing to report the gross receipts and disbursements made from the custodial account. In response to this recommendation, the Committee asserts that

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although it did not set forth the total gross receipts and the total gross expenses in its 1988 April Quarterly Report, it did include with its Schedule A eight pages of information concerning G&S and the custodial account from which the figures could be derived from adding together the receipts and expenses for the appropriate months. Moreover, the Committee notes that in its amendment to the 1988 April Quarterly Report filed on November 7, 1988, it reported gross expenses paid to G&S on Schedule B. The Committee concludes that since it has "substantially complied" with the reporting requirements, the Commission should take no further action.

In its 1988 April Quarterly, the Committee reported \$10,000 in contributions received from G&S solicitations. This \$10,000 represents only the net proceeds that the Committee received from G&S. The Committee failed to report the expenses incurred by G&S. Moreover, because the custodial account should have been designated as a campaign depository, the Committee should have reported the gross receipts, including funds which were later transferred from the custodial account to the non-federal account. Therefore, the Committee did not fully comply with the reporting requirements of 2 U.S.C. § 434(b) with regard to the custodial account. Therefore, this Office recommends that the Commission find probable cause to believe that the Democratic State Central Committee (of Colorado) and Paula Herzmark, as treasurer, violated 2 U.S.C. § 434(b).

As noted in the General Counsel's Brief, this Office also recommends that the Commission find no probable cause to believe

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that the Democratic State Central Committee (of Colorado) and Paula Herzmark, as treasurer, violated 2 U.S.C. §§ 432(c) and (d) because it appears that the Committee met the recordkeeping provisions and preserved its records pursuant to the requirements of the Act.

Gordon & Schwenkmeyer, Inc. did not submit a response to the General Counsel's Brief, therefore, it appears that it has accepted this Office's analysis and recommendation in this matter. Accordingly, this Office recommends that the Commission find no probable cause to believe that Gordon & Schwenkmeyer, Inc. violated 2 U.S.C. § 432(b)(2) and 11 C.F.R. § 102.8(b) by failing to meet the forwarding requirements of the Act.

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

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IV. RECOMMENDATIONS

1. Find probable cause to believe that the Democratic State Central Committee (of Colorado) and Paula Herzmark, as treasurer, violated 2 U.S.C. §§ 432(h) and 434(b) and 11 C.F.R. § 103.1.

2. Find no probable cause to believe that the Democratic State Central Committee (of Colorado) and Paula Herzmark, as treasurer, violated 2 U.S.C. §§ 432(c) and (d).

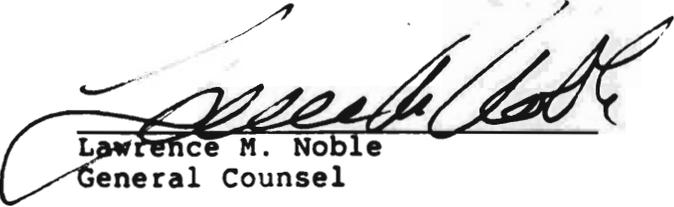
3. Find no probable cause to believe that Gordon & Schwenkmeyer, Inc. violated 2 U.S.C. § 432(b)(2) and 11 C.F.R. § 102.8(b).

4. Close the file as it pertains to Gordon & Schwenkmeyer, Inc.

5. Approve the attached conciliation agreement and letters (2).

Date

8/11/89


Lawrence M. Noble
General Counsel

Attachments:

1. Conciliation Agreement
2. Letters (2)

Staff assigned: Frania Monarski

00040774940

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
 Democratic State Central Committee)
 (of Colorado) and Paula Herzmark,) MUR 2808
 as treasurer)
 Gordon & Schwenkmeyer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of August 22, 1989, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 2808:

1. Find probable cause to believe that the Democratic State Central Committee (of Colorado) and Paula Herzmark, as treasurer, violated 2 U.S.C. §§ 432(h) and 434(b) and 11 C.F.R. § 103.1.
2. Find no probable cause to believe that the Democratic State Central Committee (of Colorado) and Paula Herzmark, as treasurer, violated 2 U.S.C. §§ 432(c) and (d).
3. Find no probable cause to believe that Gordon & Schwenkmeyer, Inc. violated 2 U.S.C. § 432(b) (2) and 11 C.F.R. § 102.8(b).

(continued)

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Federal Election Commission
Certification for MUR 2808
August 22, 1989

Page 2

4. Close the file as it pertains to Gordon & Schwenkmeyer, Inc.
5. Approve the conciliation agreement and letters attached to the General Counsel's report dated August 11, 1989.

Commissioners Aikens, Elliott, Josefiak, McDonald, and McGarry voted affirmatively for the decision; Commissioner Thomas was not present.

Attest:

8-22-89

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

2004074942



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 24, 1989

Kris Schwenkmeyer
Gordon & Schwenkmeyer, Inc.
550 N. Continental Boulevard
Suite 180
El Segundo, CA 90245

RE: MUR 2808
Gordon & Schwenkmeyer

Dear Ms. Schwenkmeyer:

This is to advise you that on August 22, 1989, the Federal Election Commission found that there is no probable cause to believe Gordon & Schwenkmeyer, Inc. violated 2 U.S.C. § 432(b)(2) and 11 C.F.R. § 102.8(b). Accordingly, the file in this matter has been closed as it pertains to Gordon & Schwenkmeyer, Inc.

This matter will become part of the public record within 30 days after it 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. Such materials should be sent to the Office of the General Counsel.

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.

If you have any questions, please contact Frania Monarski, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lawrence M. Noble".

Lawrence M. Noble
General Counsel

0004074943



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

August 24, 1989

Elizabeth J. Lentini, Esq.
Davis, Graham & Stubbs
Suite 4700
307 Seventeenth Street
P.O. Box 185
Denver, CO 80201

RE: MUR 2808
Democratic State Central
Committee (of Colorado)
and Paula Herzmark, as
treasurer

Dear Ms. Lentini:

On August 22, 1989, the Federal Election Commission found that there is probable cause to believe your clients, the Democratic State Central Committee (of Colorado) and Paula Herzmark, as treasurer, violated 2 U.S.C. §§ 432(h) and 434(b), provisions of the Federal Election Campaign Act of 1971, as amended, and 11 C.F.R. § 103.1, a provision of the Commission's Regulations, in connection with its custodial account maintained by Gordon & Schwenkmeyer, Inc.

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

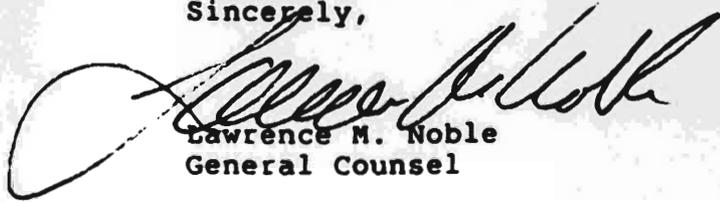
Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission within ten days. I will then recommend that the Commission accept the agreement. Please make your check for the civil penalty payable to the Federal Election Commission.

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Elizabeth J. Lentini, Esq.
Page 2

If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Franja Monarski, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

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DAVIS, GRAHAM & STUBBS
ATTORNEYS AT LAW

WASHINGTON D.C. OFFICE
SUITE 500
1200 NINETEENTH STREET, N.W.
WASHINGTON, D.C. 20036-2402
TELEPHONE 202-822-8660

SUITE 4700
370 SEVENTEENTH STREET
DENVER, COLORADO 80202

SALT LAKE CITY OFFICE
SUITE 1600-B7
EAGLE GATE TOWER
60 EAST SOUTH TEMPLE
SALT LAKE CITY, UTAH 84111-0006
TELEPHONE 801-328-6000

MAILING ADDRESS
POST OFFICE BOX 185
DENVER, COLORADO 80201-0185
TELEPHONE 303-892-9400 TELEX 240451 DGS DVR
TELECOPIER 303-893-1379 CABLE DAVGRAM, DENVER

ELIZABETH J. LENTINI
892-7465

September 14, 1989

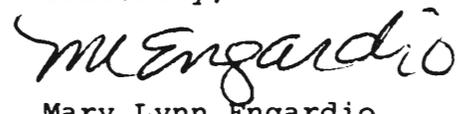
Ms. Frania Monarski
Federal Election Commission
Washington, D.C. 20463

Re: MUR 2808

Dear Ms. Monarski:

This letter will confirm our telephone conversation of September 13, 1989, in which I explained that Elizabeth Lentini's father had died; that it would impair her ability to get her written comments on the conciliation agreement to you by Tuesday's date, and you graciously extended the deadline by two weeks. Your consideration in this matter is greatly appreciated, and you may look forward to receiving the documentation by that time.

Sincerely,



Mary Lynn Engardio
Secretary to
Elizabeth J. Lentini

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF FEDERAL COUNSEL
09 SEP 18 PM 1:33

RECEIVED
FEDERAL ELECTION COMMISSION
09 SEP 18 AM 9:06

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 19, 1989

Elizabeth J. Lentini, Esq.
Davis, Graham & Stubbs
Suite 4700
370 Seventeenth Street
Denver, CO 80201

RE: MUR 2808
Democratic State Central
Committee (of Colorado)

Dear Ms. Lentini:

This is in response to your letter dated September 14, 1989, which we received on September 18, 1989, requesting an extension of 14 days to respond to MUR 2808. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on October 3, 1989.

If you have any questions, please contact Frania Monarski, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

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89 DEC 12 PM 12:49

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)	
)	
Democratic State Central)	MUR 2808
Committee (of Colorado) and)	
Paula Herzmark, as treasurer)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Trent J. Hager, the Executive Director of the Democratic State Central Committee (of Colorado) (the "Committee").

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II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with the Democratic State Central Committee (of Colorado) and Paula Herzmark, as treasurer.
2. Close the file.
3. Approve the attached letters.

Lawrence M. Noble
General Counsel

12/11/89
Date

BY: 
Lois G. Lerner
Associate General Counsel

Attachments

1. Conciliation Agreement
2. Photocopy of civil penalty check
3. Letter to Democratic State Central Committee (of Colorado)
4. Letter to Gordon & Schwenkmeyer

Staff Assigned: Frania Monarski

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Democratic State Central Committee) MUR 2808
(of Colorado) and Paula Herzmark,)
as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on December 15, 1989, the Commission decided by a vote of 6-0 to take the following actions in MUR 2808:

1. Accept the conciliation agreement with the Democratic State Central Committee (of Colorado) and Paula Herzmark, as treasurer, as recommended in the General Counsel's Report dated December 11, 1989.
2. Close the file.
3. Approve the letters as recommended in the General Counsel's Report dated December 11, 1989.

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

Attest:

12/15/89
Date

Hilda Arnold
for Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat:	Tuesday, December 12, 1989	12:49
Circulated to the Commission:	Wednesday, December 13, 1989	11:00
Deadline for vote:	Friday, December 15, 1989	11:00

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 22, 1989

Kris Schwenkmeyer
Gordon & Schwenkmeyer
550 N. Continental Boulevard
Suite 180
El Segundo, CA 90245

RE: MUR 2808
Gordon & Schwenkmeyer

Dear Ms. Schwenkmeyer:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Frania Monarski, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

00040774951



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 22, 1989

Elizabeth J. Lentini, Esq.
Davis, Graham & Stubbs
Suite 4700
307 Seventeenth Street
P.O. Box 185
Denver, CO 80201

RE: MUR 2808
Democratic State Central
Committee (of Colorado)
and Paula Herzmark, as
treasurer

Dear Ms. Lentini:

On December 15, 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. §§ 432(h) and 434(b), provisions of the Federal Election Campaign Act of 1971, as amended, and 11 C.F.R. § 103.1, a provision of the Commission's Regulations. Accordingly, the file has been closed in this matter as it pertains to your clients, the Democratic State Central Committee (of Colorado) and Paula Herzmark, as treasurer. This matter will become a part of the public record within 30 days. 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.

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Elizabeth J. Lentini
Page 2

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Frania Monarski, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel



BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Democratic State Central)	MUR 2808
Committee (of Colorado) and)	
Paula Herzmark, as treasurer)	

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 probable cause to believe that the Democratic State Central Committee (of Colorado) and Paula Herzmark, as treasurer ("Respondents"), violated 2 U.S.C. §§ 432(h) and 434(b) and 11 C.F.R. § 103.1.

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

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

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

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

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

1. The Democratic State Central Committee (of Colorado) is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Paula Herzmark is the treasurer of the Democratic State Central Committee (of Colorado).

3. Pursuant to 2 U.S.C. § 432(h), each political

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committee must designate one or more state banks, federally chartered depository institutions or insured depository institutions as its campaign depository. Commission Regulations provide that the committee must notify the Commission of all designated depositories. See 11 C.F.R. § 103.1. No disbursements may be made by the committee except by check drawn from the campaign depository. 2 U.S.C. § 432(h).

4. Respondents deposited contributions and made disbursements from a custodial account at the Bank of Beverly Hills, maintained by Gordon & Schwenkmeyer, their telemarketing and fundraising agent. Respondents failed to designate the custodial account as a campaign depository in a timely manner and failed to notify the Commission of this account. On March 15, 1989, Respondents submitted an amended Statement of Organization designating the custodial account at the Bank of Beverly Hills as a campaign depository.

5. Pursuant to 2 U.S.C. § 434(b), a treasurer of a political committee must file periodic reports indicating receipts and disbursements made during that period.

6. In the 1988 April Quarterly Report, Respondents reported only net proceeds received from the custodial account. Respondents failed to report gross receipts and disbursements made from the custodial account. On July 25, 1989, Respondents filed an amended 1988 April Quarterly Report noting the gross receipts and disbursements made from the custodial account.

V. Respondents failed to designate the custodial account maintained by Gordon & Schwenkmeyer as a campaign depository in a

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timely manner in violation of 2 U.S.C. § 432(h). Respondents also failed to notify the Commission of the custodial account as a campaign depository in a timely manner in violation of 11 C.F.R. § 103.1. Moreover, Respondents failed to report the gross receipts and disbursements made from the custodial account in a timely manner in violation of 2 U.S.C. § 434(b).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of one thousand three hundred and fifty dollars (\$1,350), 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. Respondents 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:

Lawrence M. Noble
General Counsel

BY:


Lois G. Lerner
Associate General Counsel

12-22-89
Date

FOR THE RESPONDENTS:


Trent J. Hager
Executive Director and
agent for Paula Herzmark,
Treasurer.

11-20-89
Date

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2808

DATE FILMED 1/17/90 CAMERA NO. 4

CAMERAMAN AS

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