



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2870

DATE FILMED 8/28/92 CAMERA NO. 4

CAMERAMAN E.E.S.

92040922389



OGC# 717  
- PA 10/20/88

GEMcD:LJR:CCD:mab

Washington, D.C. 20530  
OCT 18 1988

The Honorable Thomas Josefiak  
Chairman  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20004

RECEIVED  
FEDERAL ELECTION COMMISSION  
OCT 21 PM 3:44

Dear Mr. Chairman:

Enclosed is a copy of a political fund-raising solicitation letter that was sent on behalf of a political committee called the Coalition for a Winning Ticket by means of direct mail to an address within the United States Department of Justice. In accordance with our standard policy in matters of this kind, we have sent the Committee's Chairman, Senator Gordon Humphrey, a warning letter advising him of the requirements of 18 U.S.C. § 607, and asking that he take immediate measures to assure that future solicitations are not sent to areas where federal personnel are engaged in the conduct of official duties. As such, the matter is now closed in the Department of Justice.

However, we note from the letter itself that it does not carry the disclaimer required by 2 U.S.C. § 441d. We are also advised that the Coalition for a Winning Ticket has not yet registered with the Federal Election Commission (FEC) as required by 2 U.S.C. § 433. Since neither of these possible violations of the Federal Election Campaign Act appear to us to have been done with the degree of "willful" intent necessary to constitute a criminal offense under 2 U.S.C. § 437g(d), we are referring these matters to the FEC for such action as you deem appropriate under 2 U.S.C. § 437g(a).

Sincerely,

Gerald E. McDowell  
Chief, Public Integrity Section  
Criminal Division

By: *Craig C. Donsanto*

Craig C. Donsanto  
Director, Election Crimes Branch  
Public Integrity Section  
Criminal Division

Enclosures

920409632390

# COALITION FOR A WINNING TICKET

GORDON HUMPHREY, U.S. SENATE  
Chairman

Dear Fellow Conservative:

I'll be blunt.

I'm asking you to give at least \$250 to as important a project as we conservatives will undertake in this election year.

And that project is to convince George Bush to pick a conservative as his running mate if we are to defeat liberal Michael Dukakis.

Take a second to read the press release I issued at a news conference in the Senate Press Gallery. More than ever grassroots conservatives need to take the lead in assuring that we have a winning ticket and a winning platform. That's why I formed the "Coalition For A Winning Ticket."

As you read this the Republican Convention is ready to convene in New Orleans and I will need your support and that of others to make this project a success.

We are planning daily strategy meetings with delegates and other non-delegate leaders in New Orleans. We will hold press briefings on our efforts to have as much input as possible until Mr. Bush makes his selection on the final day of the convention.

So we don't have much time. Time is so short, in fact, that I'm asking you to send your donation directly to me in New Orleans instead of Washington. That way I'll have an up-to-the-minute list to release to the press of members of the Coalition.

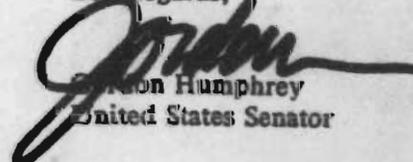
Believe me, this is a cause worth fighting for! And there are issues worth fighting for! A Strong National Defense! Balanced Budget Amendment! Right to Life! No Tax Hike! Right to Keep and Bear Arms! Aid to the Contras and other Freedom Fighters! Line Item Veto! Deployment of SDI! Defunding the Left! The list goes on and on!

In all my years in the U.S. Senate I've lead many fights on issues important to our conservative principles and to our country. But this one is as important, if not more so, than any of them so please don't let me down.

We're already committed to a budget of \$50,000 so please send me your \$250, your \$500, even your \$750 or \$1,000 payable to Coalition For A Winning Ticket to my personal attention in New Orleans.

Time is so valuable and this project so important, if you have any questions, call me in New Orleans at (504) 528-2252, or my Executive Director, Dan Ferrin at the same number.

Best regards,

  
Gordon Humphrey  
United States Senator

92040922391

9 2 0 4 0 9 2 2 3 9 2

**COALITION FOR A WINNING TICKET**

1100 Poydras Street  
Suite 1205  
New Orleans, LA 70167

AUG 12 88

CRM-2107



The Hon. John C. Keeney  
Dep. Asst. Atty. General, Cd  
Dept. of Justice  
10th & Const. Ave. N.W.  
Washington DC 20530



89 JAN 13 PM 2:10

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

**SENSITIVE**  
**EXECUTIVE SESSION**

**FIRST GENERAL COUNSEL'S REPORT**

**JAN 24 1989**

Pre-MUR # 203  
STAFF MEMBER: T.K. Kapper

SOURCE: INTERNALLY GENERATED  
RESPONDENTS: Coalition For A Winning Ticket and its treasurer  
RELEVANT STATUTES: 2 U.S.C. § 433(a)  
2 U.S.C. § 434(a)(4)(A) and (B)  
2 U.S.C. § 441d

INTERNAL REPORTS CHECKED: Computer Index For Registered  
Committees

FEDERAL AGENCIES CHECKED: None

**I. GENERATION OF MATTER**

On October 21, 1988, the Commission received a referral from the Department of Justice. The referral asserted that an unregistered organization named the Coalition For A Winning Ticket may be in violation of federal election laws. The alleged violations arise from a political fundraising solicitation letter lacking a disclaimer notice sent to an address within the United States Department of Justice. The solicitation letter was signed by the Honorable Gordon Humphrey, as chairman, and listed Dan Perrin as executive director.

**II. FACTUAL AND LEGAL ANALYSIS**

**1. Facts**

Based on information provided by the referral and a copy of the solicitation letter that was enclosed with the referral, the

92040922393

facts, briefly summarized, are as follows:

The Coalition For A Winning Ticket ("CWT") mailed a fundraising solicitation by means of direct mail to an individual within the Department of Justice. The letter was postmarked on August 10, 1988. The letter requested a contribution of "at least \$250" in order "to convince George Bush to pick a conservative as his running mate if we are to defeat liberal Michael Dukakis." (See Attachment 1). The solicitation stated that the contribution should be made payable to CWT and sent directly to the Honorable Gordon Humphrey in New Orleans because, "We're already committed to a budget of \$50,000 . . . ."

According to records at the Commission, CWT has not yet filed a Statement of Organization nor has it filed reports of receipts and disbursements. Furthermore, it appears that the solicitation letter did not contain a disclaimer notice.

2. The Applicable Law

The Federal Election Campaign Act of 1971 as amended the ("Act"), contains three legal requirements that have specific application to the above stated facts: 2 U.S.C. § 433(a), § 434(a)(4)(A) and (B), and § 441d.

A "political committee" is defined as any committee, club, association, or other group of persons which receives contributions aggregating in excess of \$1,000 during a calendar year or which makes expenditures aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. § 431(4)(A).

92040922394

The Act defines a "contribution" to include "any gift, subscription, loan, advances, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal Office." 2 U.S.C. § 431(8)(A)(i).

Similarly, the Act defines "expenditure" to include "any purchase, payment, distribution, loan, advance, deposit, or gift of money, or anything of value made by any person for the purpose of influencing any election for Federal Office."

2 U.S.C. § 431(9)(A)(i).

Section 433(a) of Title 2, United States Code, requires that all committees shall file a Statement of Organization no later than 10 days after becoming a political committee.

The Act requires that all political committees shall file either quarterly or monthly reports of receipts and disbursements during the year in which a regularly scheduled general election is held. 2 U.S.C. § 434(a)(4)(A) and (B).

The Act also requires that whenever any person makes an expenditure for the purpose of financing communications expressly advocating the election or defeat of a clearly identified candidate, or solicits any contribution through direct mail that is aimed at the general public, the communication shall contain a disclaimer. 2 U.S.C. § 441d. Furthermore, 11 C.F.R.

§ 110.11(a)(1) and (a)(1)(iv)(A) state, in relevant parts, that the disclaimer shall be clear and conspicuous so that the reader has adequate notice of who paid for the communication and shall state the full name of the person who paid for the communication on behalf of the political committee.

92040922395

3. Application of the Law to the Facts

By direct mail, CWT solicited funds to influence the Republican nomination for Vice-president, and expressly advocated the defeat of a presidential candidate by stating the need "to defeat liberal Michael Dukakis."

CWT thus appears to be operating as a "political committee" as defined by the Act, by expressly advocating the defeat of a presidential candidate and soliciting contributions from the general public through the use of direct mail. Neither the cost of the mailing nor the amount of the proceeds realized is apparent. Nonetheless, the mailing reflects CWT's intent to exceed the \$1,000 registration threshold by soliciting individual contributions of up to \$1,000 and asserting the commitment "to a budget of \$50,000." As of this date, CWT has filed neither a Statement of Organization nor reports of receipts and disbursements. Therefore, in light of the foregoing, the Office of the General Counsel recommends that the Commission find reason to believe that CWT and its treasurer, violated 2 U.S.C. §§ 433 and 434.

The solicitation letter that CWT apparently mailed to the general public failed to disclose the person or persons who authorized and paid for the mailing. Therefore, the Office of the General Counsel also recommends that the Commission find reason to believe that CWT and its treasurer, violated 2 U.S.C. § 441d.

92040922396

The mailing identifies Senator Gordon Humphrey as chairman and founder of CWT, and describes Mr. Dan Perrin as its executive director. To initiate the investigation in this matter, this Office has prepared questions and requests for documents to Senator Humphrey and Mr. Perrin as well as to CWT itself. We have also addressed copies of CWT's notification letter to these individuals along with their questions and document requests.

RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that Coalition For A Winning Ticket and its treasurer violated 2 U.S.C. §§ 433, 434 and 441d.
3. Approve and send the attached letters, legal and factual analysis, interrogatories and requests for the production of documents.

Lawrence M. Noble  
General Counsel

Date

1/13/89

By:

  
Lois G. Lerner  
Associate General Counsel

Attachments

1. Referral Material
2. Proposed Letters (3)
3. Proposed Factual and Legal Analysis (1)
4. Questions (3)

92040922397



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE  
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JOSHUA MCFADDEN *JAA*  
COMMISSION SECRETARY

DATE: JANUARY 18, 1989

SUBJECT: OBJECTIONS TO Pre-MUR 203 - FIRST G.C. REPORT  
SIGNED JANUARY 13, 1989

The above-captioned document was circulated to the Commission on Tuesday, January 17, 1989 at 11:00 a.m.

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

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

This matter will be placed on the meeting agenda for January 24, 1989.

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

cc: Chairman Office

92040922398

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Coalition For A Winning Ticket ) Pre-MUR 203  
and its treasurer )

(MUR  
2810)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of January 24, 1989, do hereby certify that the Commission decided by a vote of 4-1 to take the following actions with respect to Pre-MUR 203:

1. Open a Matter Under Review (MUR).
2. Find reason to believe that Coalition For A Winning Ticket and its treasurer violated 2 U.S.C. §§ 433, 434, and 441d.
3. Approve and send the letters, legal and factual analysis, interrogatories and requests for the production of documents as recommended in the General Counsel's report dated January 13, 1989, as amended during the meeting discussion.

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

Attest:

Jan. 25, 1989  
Date

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

92040922399



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 1, 1989

Coalition For A Winning Ticket  
c/o Dan Perrin  
1100 Poydras Street, Suite 1205  
New Orleans, LA 70167

RE: MUR 2810  
Coalition For A Winning Ticket  
and its treasurer

Dear Mr. Perrin:

On January 24, 1989, the Federal Election Commission found that there is reason to believe the Coalition For A Winning Ticket and its treasurer, violated 2 U.S.C. §§ 433, 434, and 441d, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Coalition For A Winning Ticket and its 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 Coalition For A Winning Ticket and its treasurer, 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.

92040922400

Dan Perrin  
Page 2

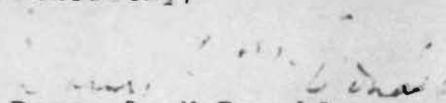
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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

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

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

Sincerely,

  
Danny L. McDonald  
Chairman

Enclosures  
Factual and Legal Analysis  
Procedures  
Designation of Counsel Form  
Interrogatories

92040922401

FEDERAL ELECTION COMMISSION  
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Coalition For A Winning  
Ticket and its treasurer

MUR: 2810

I. GENERATION OF MATTER

On October 21, 1988, the Commission received a referral from the Department of Justice. The referral asserted that an unregistered organization named the Coalition For A Winning Ticket may be in violation of federal election laws. The alleged violations arose from the receipt of a political fundraising solicitation letter lacking a disclaimer notice by an address within the United States Department of Justice. The solicitation letter was signed by the Honorable Gordon Humphrey, as chairman, and listed Dan Perrin as executive director.

II. FACTUAL AND LEGAL ANALYSIS

1. Facts

Based on information provided by the referral and a copy of the solicitation letter that was enclosed with the referral, the facts, briefly summarized, are as follows:

The Coalition For A Winning Ticket ("CWT") mailed a fundraising solicitation by means of direct mail to an individual within the Department of Justice. The letter was postmarked on August 10, 1988. The letter requested a contribution of "at least \$250" in order "to convince George Bush to pick a conservative as his running mate if we are to defeat liberal Michael Dukakis." (See Exhibit A attached). The solicitation stated that the contribution should be made payable to CWT and

92040922402

sent directly to the Honorable Gordon Humphrey in New Orleans because, "We're already committed to a budget of \$50,000 . . ."

According to records at the Commission, CWT has not yet filed a Statement of Organization nor has it filed reports of receipts and disbursements. Furthermore, it appears that the solicitation letter did not contain a disclaimer notice.

2. The Applicable Law

The Federal Election Campaign Act of 1971 as amended the ("Act"), contains three legal requirements that have specific application to the above stated facts: 2 U.S.C. § 433(a), § 434(a)(4)(A) and (B), and § 441d.

A "political committee" is defined as any committee, club, association, or other group of persons which receives contributions aggregating in excess of \$1,000 during a calendar year or which makes expenditures aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. § 431(4)(A).

The Act defines a "contribution" to include "any gift, subscription, loan, advances, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal Office." 2 U.S.C. § 431(8)(A)(i). Similarly, the Act defines "expenditure" to include "any purchase, payment, distribution, loan, advance, deposit, or gift of money, or anything of value made by any person for the purpose influencing any election for Federal Office." 2 U.S.C. § 431(9)(A)(i).

92040922403

Section 433(a) of Title 2, United States Code, requires that all committees shall file a Statement of Organization no later than 10 days after becoming a political committee.

The Act requires that all political committees shall file either quarterly or monthly reports of receipts and disbursements during the year in which a regularly scheduled general election is held. 2 U.S.C. § 434(a)(4)(A) and (B).

The Act also requires that whenever any person makes an expenditure for the purpose of financing communications expressly advocating the election or defeat of a clearly identified candidate, or solicits any contribution through direct mail that is aimed at the general public, the communication shall contain a disclaimer. 2 U.S.C. § 441d. Furthermore, 11 C.F.R. § 110.11(a)(1) and (a)(1)(iv)(A) state, in relevant parts, that the disclaimer shall be clear and conspicuous so that the reader has adequate notice of who paid for the communication and shall state the full name of the person who paid for the communication on behalf of the political committee.

### 3. Application of the Law to the Facts

By direct mail, CWT solicited funds to influence the Republican nomination for Vice-president, and expressly advocated the defeat of a presidential candidate by stating the need "to defeat liberal Michael Dukakis."

CWT thus appears to be operating as a "political committee" as defined by the Act, by expressly advocating the defeat of a

92040922404

presidential candidate and soliciting contributions from the general public through the use of direct mail. Neither the cost of the mailing nor the amount of the proceeds realized is apparent. Nonetheless, the mailing reflects CWT's intent to exceed the \$1,000 registration threshold by soliciting individual contributions of up to \$1,000 and asserting the commitment "to a budget of \$50,000." As of this date, CWT has filed neither a Statement of Organization nor reports of receipts and disbursements. Therefore, in light of the foregoing, there is reason to believe that CWT and its treasurer, violated 2 U.S.C. §§ 433 and 434.

The solicitation letter that CWT apparently mailed to the general public failed to disclose the person or persons who authorized and paid for the mailing. Therefore, there is reason to believe that CWT and its treasurer, violated 2 U.S.C. § 4411.

92040922405

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)  
)  
)  
)

MUR 2810

INTERROGATORIES AND REQUEST FOR  
PRODUCTION OF DOCUMENTS

To: Dan Perrin  
1100 Poydras Street, Suite 1205  
New Orleans, Louisiana 70167

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within fifteen (15) days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals.

92040922406

INSTRUCTIONS

In answering these interrogatories and request for the production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any communications, or other items about which information is requested by any of the following interrogatories, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery requests shall refer to the time period from January 1, to December 31, 1988.

The following interrogatories are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

92040922407

DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

92040922408

BEFORE THE FEDERAL ELECTION COMMISSION

MUR 2810

Questions to Dan Perrin

With regard to the political fundraising letter mailed by the Coalition For A Winning Ticket that is attached as Exhibit A, please answer the following questions:

1. Please state the exact date and by whom the Coalition For A Winning Ticket was formed.
2. Please identify the treasurer and/or the individual responsible for the financial operation of the Coalition For A Winning Ticket.
3. State the total amount of receipts of the Coalition For A Winning Ticket from January 1, through December 31, 1988.
4. State the total amount of disbursements by the Coalition For A Winning Ticket from January 1, through December 31, 1988.
5. With respect to the solicitation letter, please identify all persons who were involved in its preparation. Describe, in full, each such person's participation in the preparation of the letter.
6. Please provide copies of all enclosures mailed with the letter.
7. State the total number of letters mailed.
8. State the source of the mailing list.
9. Regarding the costs of preparation and distribution of the letter, please,
  - a) identify the persons who paid for it.
  - b) state the source of funds used, (e.g. contributions, donations, corporate funds, etc.).
  - c) state the total amount of funds expended.
  - d) state the total amount of proceeds generated from the mailing.
10. Please provide a copy of all documents relating to the payment of costs for the preparation and publication of the solicitation letter. If the payment was made by check or other written instrument, please provide a copy (both sides) of such check or other written instrument.

92040922409

11. Please state whether there were any additional mailings sent on behalf of the Coalition For A Winning Ticket from January 1 through December 31, 1988. If so, as to each mailing,

- a) provide a copy of the letter sent.
- b) state the total number of letters sent.
- c) state the total amount of funds expended.
- d) state the total amount of funds raised.

92040922410



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

February 1, 1989

Coalition For A Winning Ticket  
and its treasurer  
1100 Poydras Street, Suite 1205  
New Orleans, LA 70167

RE: MUR 2810  
Coalition For A Winning  
Ticket and its treasurer

Dear Sir:

On January 24, 1989, the Federal Election Commission found that there is reason to believe the Coalition For A Winning Ticket and its treasurer, violated 2 U.S.C. §§ 433, 434, and 441d, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Coalition For A Winning Ticket and its 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 Coalition For A Winning Ticket and its treasurer, 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.

92040922411

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

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

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

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

Sincerely,

  
Danny L. McDonald  
Chairman

Enclosures  
Factual and Legal Analysis  
Procedures  
Designation of Counsel Form  
Interrogatories

92040922412

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Coalition For A Winning  
Ticket and its treasurer

MUR:2810

I. GENERATION OF MATTER

On October 21, 1988, the Commission received a referral from the Department of Justice. The referral asserted that an unregistered organization named the Coalition For A Winning Ticket may be in violation of federal election laws. The alleged violations arose from the receipt of a political fundraising solicitation letter lacking a disclaimer notice by an address within the United States Department of Justice. The solicitation letter was signed by the Honorable Gordon Humphrey, as chairman, and listed Dan Perrin as executive director.

II. FACTUAL AND LEGAL ANALYSIS

1. Facts

Based on information provided by the referral and a copy of the solicitation letter that was enclosed with the referral, the facts, briefly summarized, are as follows:

The Coalition For A Winning Ticket ("CWT") mailed a fundraising solicitation by means of direct mail to an individual within the Department of Justice. The letter was postmarked on August 10, 1988. The letter requested a contribution of "at least \$250" in order "to convince George Bush to pick a conservative as his running mate if we are to defeat liberal Micahel Dukakis." (See Exhibit A attached). The solicitation stated that the contribution should be made payable to CWT and

92040922413

sent directly to the Honorable Gordon Humphrey in New Orleans because, "We're already committed to a budget of \$50,000 . . . ."

According to records at the Commission, CWT has not yet filed a Statement of Organization nor has it filed reports of receipts and disbursements. Furthermore, it appears that the solicitation letter did not contain a disclaimer notice.

## 2. The Applicable Law

The Federal Election Campaign Act of 1971 as amended the ("Act"), contains three legal requirements that have specific application to the above stated facts: 2 U.S.C. § 433(a), § 434(a)(4)(A) and (B), and § 441d.

A "political committee" is defined as any committee, club, association, or other group of persons which receives contributions aggregating in excess of \$1,000 during a calendar year or which makes expenditures aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. § 431(4)(A).

The Act defines a "contribution" to include "any gift, subscription, loan, advances, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal Office." 2 U.S.C. § 431(8)(A)(i). Similarly, the Act defines "expenditure" to include "any purchase, payment, distribution, loan, advance, deposit, or gift of money, or anything of value made by any person for the purpose influencing any election for Federal Office." 2 U.S.C. § 431(9)(A)(i).

92040922414

Section 433(a) of Title 2, United States Code, requires that all committees shall file a Statement of Organization no later than 10 days after becoming a political committee.

The Act requires that all political committees shall file either quarterly or monthly reports of receipts and disbursements during the year in which a regularly scheduled general election is held. 2 U.S.C. § 434(a)(4)(A) and (B).

The Act also requires that whenever any person makes an expenditure for the purpose of financing communications expressly advocating the election or defeat of a clearly identified candidate, or solicits any contribution through direct mail that is aimed at the general public, the communication shall contain a disclaimer. 2 U.S.C. § 441d. Furthermore, 11 C.F.R. § 110.11(a)(1) and (a)(1)(iv)(A) state, in relevant parts, that the disclaimer shall be clear and conspicuous so that the reader has adequate notice of who paid for the communication and shall state the full name of the person who paid for the communication on behalf of the political committee.

### 3. Application of the Law to the Facts

By direct mail, CWT solicited funds to influence the Republican nomination for Vice-president, and expressly advocated the defeat of a presidential candidate by stating the need "to defeat liberal Michael Dukakis."

CWT thus appears to be operating as a "political committee" as defined by the Act, by expressly advocating the defeat of a

92040922415

presidential candidate and soliciting contributions from the general public through the use of direct mail. Neither the cost of the mailing nor the amount of the proceeds realized is apparent. Nonetheless, the mailing reflects CWT's intent to exceed the \$1,000 registration threshold by soliciting individual contributions of up to \$1,000 and asserting the commitment "to a budget of \$50,000." As of this date, CWT has filed neither a Statement of Organization nor reports of receipts and disbursements. Therefore, in light of the foregoing, there is reason to believe that CWT and its treasurer, violated 2 U.S.C. §§ 433 and 434.

The solicitation letter that CWT apparently mailed to the general public failed to disclose the person or persons who authorized and paid for the mailing. Therefore, there is reason to believe that CWT and its treasurer, violated 2 U.S.C. § 441d.

9 2 0 4 0 9 2 2 4 1 6

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)  
)  
)  
)

MUR 2810

INTERROGATORIES AND REQUEST FOR  
PRODUCTION OF DOCUMENTS

TO: Coalition For A Winning Ticket,  
and its treasurer  
1100 Poydras Street, Suite 1205  
New Orleans, Louisiana 70167

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within fifteen (15) days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals.

92040922417

INSTRUCTIONS

In answering these interrogatories and request for the production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any communications, or other items about which information is requested by any of the following interrogatories, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery requests shall refer to the time period from January 1, to December 31, 1988.

The following interrogatories are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

92040922418

DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

92040922419

BEFORE THE FEDERAL ELECTION COMMISSION

MUR 2810

Questions to Coalition for a Winning Ticket

With regard to the political fundraising letter mailed by the Coalition For A Winning Ticket that is attached as Exhibit A, please answer the following questions:

1. Please state the exact date and by whom the Coalition For A Winning Ticket was formed.
2. Please identify the treasurer and/or the individual responsible for the financial operation of the Coalition For A Winning Ticket.
3. State the total amount of receipts of the Coalition For A Winning Ticket from January 1, through December 31, 1988.
4. State the total amount of disbursements by the Coalition For A Winning Ticket from January 1, through December 31, 1988.
5. With respect to the solicitation letter, please identify all persons who were involved in its preparation. Describe, in full, each such person's participation in the preparation of the letter.
6. Please provide copies of all enclosures mailed with the letter.
7. State the total number of letters mailed.
8. State the source of the mailing list.
9. Regarding the costs of preparation and distribution of the letter, please,
  - a) identify the persons who paid for it.
  - b) state the source of funds used, (e.g. contributions, donations, corporate funds, etc.).
  - c) state the total amount of funds expended.
  - d) state the total amount of proceeds generated from the mailing.
10. Please provide a copy of all documents relating to the payment of costs for the preparation and publication of the solicitation letter. If the payment was made by check or other written instrument, please provide a copy (both sides) of such check or other written instrument.

92040922420

11. Please state whether there were any additional mailings sent on behalf of the Coalition For A Winning Ticket from January 1 through December 31, 1988. If so, as to each mailing,

- a) provide a copy of the letter sent.
- b) state the total number of letters sent.
- c) state the total amount of funds expended.
- d) state the total amount of funds raised.

92040922421



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

February 1, 1989

Coalition For A Winning Ticket  
c/o The Honorable Gordon Humphrey  
PO Box 1461  
Concord, NH 03301

RE: MUR 2810  
Coalition For A Winning Ticket  
and its treasurer

Dear Senator Humphrey:

On January 24, 1989, the Federal Election Commission found that there is reason to believe the Coalition For A Winning Ticket and its treasurer, violated 2 U.S.C. §§ 433, 434 and 441d, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Coalition For A Winning Ticket and its 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 Coalition For A Winning Ticket and its treasurer, 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.

92040922422

plm

Seantor Gordon Humphrey  
Page 2

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

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

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

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

Sincerely,

Danny L. McDonald  
Chairman

Enclosures

Factual and Legal Analysis  
Procedures  
Designation of Counsel Form  
Questions

9 2 0 4 0 9 2 2 4 2 3

FEDERAL ELECTION COMMISSION  
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Coalition For A Winning  
Ticket and its treasurer

MUR: 2810

I. GENERATION OF MATTER

On October 21, 1988, the Commission received a referral from the Department of Justice. The referral asserted that an unregistered organization named the Coalition For A Winning Ticket may be in violation of federal election laws. The alleged violations arose from the receipt of a political fundraising solicitation letter lacking a disclaimer notice by an address within the United States Department of Justice. The solicitation letter was signed by the Honorable Gordon Humphrey, as chairman, and listed Dan Perrin as executive director.

II. FACTUAL AND LEGAL ANALYSIS

1. Facts

Based on information provided by the referral and a copy of the solicitation letter that was enclosed with the referral, the facts, briefly summarized, are as follows:

The Coalition For A Winning Ticket ("CWT") mailed a fundraising solicitation by means of direct mail to an individual within the Department of Justice. The letter was postmarked on August 10, 1988. The letter requested a contribution of "at least \$250" in order "to convince George Bush to pick a conservative as his running mate if we are to defeat liberal Micahel Dukakis." (See Exhibit A attached). The solicitation stated that the contribution should be made payable to CWT and

92040922424

sent directly to the Honorable Gordon Humphrey in New Orleans because, "We're already committed to a budget of \$50,000 . . ."

According to records at the Commission, CWT has not yet filed a Statement of Organization nor has it filed reports of receipts and disbursements. Furthermore, it appears that the solicitation letter did not contain a disclaimer notice.

## 2. The Applicable Law

The Federal Election Campaign Act of 1971 as amended the ("Act"), contains three legal requirements that have specific application to the above stated facts: 2 U.S.C. § 433(a), § 434(a)(4)(A) and (B), and § 441d.

A "political committee" is defined as any committee, club, association, or other group of persons which receives contributions aggregating in excess of \$1,000 during a calendar year or which makes expenditures aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. § 431(4)(A).

The Act defines a "contribution" to include "any gift, subscription, loan, advances, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal Office." 2 U.S.C. § 431(8)(A)(i). Similarly, the Act defines "expenditure" to include "any purchase, payment, distribution, loan, advance, deposit, or gift of money, or anything of value made by any person for the purpose influencing any election for Federal Office." 2 U.S.C. § 431(9)(A)(i).

92040922425

Section 433(a) of Title 2, United States Code, requires that all committees shall file a Statement of Organization no later than 10 days after becoming a political committee.

The Act requires that all political committees shall file either quarterly or monthly reports of receipts and disbursements during the year in which a regularly scheduled general election is held. 2 U.S.C. § 434(a)(4)(A) and (B).

The Act also requires that whenever any person makes an expenditure for the purpose of financing communications expressly advocating the election or defeat of a clearly identified candidate, or solicits any contribution through direct mail that is aimed at the general public, the communication shall contain a disclaimer. 2 U.S.C. § 441d. Furthermore, 11 C.F.R.

§ 110.11(a)(1) and (a)(1)(iv)(A) state, in relevant parts, that the disclaimer shall be clear and conspicuous so that the reader has adequate notice of who paid for the communication and shall state the full name of the person who paid for the communication on behalf of the political committee.

### 3. Application of the Law to the Facts

By direct mail, CWT solicited funds to influence the Republican nomination for Vice-president, and expressly advocated the defeat of a presidential candidate by stating the need "to defeat liberal Michael Dukakis."

CWT thus appears to be operating as a "political committee" as defined by the Act, by expressly advocating the defeat of a

92040922426

presidential candidate and soliciting contributions from the general public through the use of direct mail. Neither the cost of the mailing nor the amount of the proceeds realized is apparent. Nonetheless, the mailing reflects CWT's intent to exceed the \$1,000 registration threshold by soliciting individual contributions of up to \$1,000 and asserting the commitment "to a budget of \$50,000." As of this date, CWT has filed neither a Statement of Organization nor reports of receipts and disbursements. Therefore, in light of the foregoing, there is reason to believe that CWT and its treasurer, violated 2 U.S.C. §§ 433 and 434.

The solicitation letter that CWT apparently mailed to the general public failed to disclose the person or persons who authorized and paid for the mailing. Therefore, there is reason to believe that CWT and its treasurer, violated 2 U.S.C. § 441b.

92040922427

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)  
)  
)  
)

MUR 2810

INTERROGATORIES AND REQUEST FOR  
PRODUCTION OF DOCUMENTS

TO: The Honorable Gordon Humphrey  
P.O. Box 1461  
Concord, New Hampshire 03301

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within fifteen (15) days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals.

92040922428

INSTRUCTIONS

In answering these interrogatories and request for the production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any communications, or other items about which information is requested by any of the following interrogatories, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery requests shall refer to the time period from January 1, to December 31, 1988.

The following interrogatories are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

92040922429

### DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

92040922430

BEFORE THE FEDERAL ELECTION COMMISSION

MUR 2810

Questions to Senator Gordon Humphrey

With regard to the political fundraising letter mailed by the Coalition For A Winning Ticket that is attached as Exhibit A, please answer the following questions:

1. Please state the exact date and by whom the Coalition For A Winning Ticket was formed.
2. Please identify the treasurer and/or the individual responsible for the financial operation of the Coalition For A Winning Ticket.
3. State the total amount of receipts of the Coalition For A Winning Ticket from January 1, through December 31, 1988.
4. State the total amount of disbursements by the Coalition For A Winning Ticket from January 1, through December 31, 1988.
5. With respect to the solicitation letter, please identify all persons who were involved in its preparation. Describe, in full, each such person's participation in the preparation of the letter.
6. Please provide copies of all enclosures mailed with the letter.
7. State the total number of letters mailed.
8. State the source of the mailing list.
9. Regarding the costs of preparation and distribution of the letter, please,
  - a) identify the persons who paid for it.
  - b) state the source of funds used, (e.g. contributions, donations, corporate funds, etc.).
  - c) state the total amount of funds expended.
  - d) state the total amount of proceeds generated from the mailing.
10. Please provide a copy of all documents relating to the payment of costs for the preparation and publication of the solicitation letter. If the payment was made by check or other written instrument, please provide a copy (both sides) of such check or other written instrument.

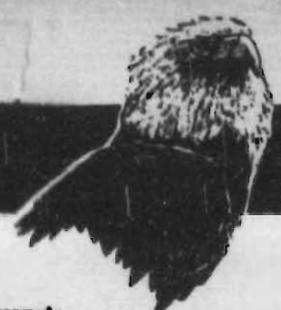
92040922431

11. Please state whether there were any additional mailings sent on behalf of the Coalition For A Winning Ticket from January 1 through December 31, 1988. If so, as to each mailing,

- a) provide a copy of the letter sent.
- b) state the total number of letters sent.
- c) state the total amount of funds expended.
- d) state the total amount of funds raised.

9 2 0 4 0 9 2 2 4 3 2

06C1830  
Purdon 203



# Free the Eagle

Howard J. Ruff - Chairman of the Board

MUR  
2810

Howard Segermark -  
Managing Director

February 9, 1989

Mr. Danny L. McDonald  
Chairman  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Dear Mr. McDonald:

I have received from Senator Gordon Humphrey the material you mailed to him concerning the Coalition for a Winning Ticket.

The Coalition was a project of Free The Eagle, which is organized as an exempt organization under section 501(c)(4) of the Internal Revenue Code. Senator Humphrey had no official capacity with the project except to serve as an honorary chairman.

As Managing Director of Free The Eagle, I shall respond to your inquiry regarding the Coalition, and request that all future correspondence regarding this matter be directed to my attention.

Sincerely,

*Howard Segermark*  
Howard Segermark

cc: Senator Gordon Humphrey

89 FEB 13 PM 5:29

RECEIVED  
FEDERAL ELECTION COMMISSION

89 FEB 13 PM 4:12

RECEIVED  
FEDERAL ELECTION COMMISSION

92040922433

06C 1962

FEDERAL ELECTION COMMISSION  
COPY ROOM

89 FEB 22 PM 5:43

LAW OFFICES  
WEBSTER, CHAMBERLAIN & BEAN  
1747 PENNSYLVANIA AVENUE, N. W.  
WASHINGTON, D. C. 20006

(202) 785-9500  
FAX: (202) 835-0243

OF COUNSEL  
CHARLES E. CHAMBERLAIN  
CONSULTANT  
A. L. SINGLETON

GEORGE D. WEBSTER  
J. COLEMAN BEAN  
ARTHUR L. HEROLD  
ALAN P. DYE  
BURKETT VAN KIRK  
C. MICHAEL DEESE  
FRANK M. NORTHAM  
GERARD P. FANARO  
JOHN W. HAZARD, JR.  
CHARLES M. WATRINS  
ROBERT M. SKELTON  
HUGH K. WEBSTER  
ANNE B. POPE

February 22, 1989

RECEIVED  
FEDERAL ELECTION COMMISSION  
89 FEB 27 PM 3:47

BY HAND

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

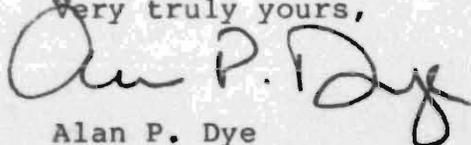
Re: MUR 2810 - Coalition for a Winning Ticket

Attention: Patty Reilly, Esquire

Dear Ms. Reilly:

As I indicated in our telephone conversation this morning, we have been asked to represent Coalition for a Winning Ticket, which was operated as a short-term project by persons associated with Free the Eagle, a social welfare organization located in Washington, D.C. Because the Commission's initial communication was with Gordon Humphrey, who is not in possession of the information necessary to respond meaningfully to your letter, and because we have only been recently brought into the case we would be grateful for an extension of time to respond to the questions raised in your letter. Because Coalitions for a Winning Ticket was an informal effort not intended to influence anyone's vote in the presidential election those involved did not anticipate the necessity of filing reports with the Federal Election Commission. This makes the accumulation of the information necessary to respond to your letter more difficult and time-consuming. For this reason we would appreciate an extension of time of 15 days to respond to your questions.

Attached is a designation of counsel permitting you to respond directly to me.

Very truly yours,  
  
Alan P. Dye

APD:pw

Attachment

92040922434

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED  
FEDERAL ELECTION COMMISSION

89 FEB 22 PM 5:43

MUR c 2810

NAME OF COUNSEL: Alan P. Dye, Esquire

ADDRESS: 1747 Pennsylvania Avenue, N.W.  
Suite 1000

Washington, D.C. 20006

TELEPHONE: (202) 785-9500

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.

Feb. 22, 1989  
Date

Howard Segermark  
Signature

RESPONDENT'S NAME: Coalition for a Winning Ticket  
Howard Segermark

ADDRESS: 25 E Street, N.W., 8th Floor  
Washington, D.C. 20001

HOME PHONE: (703) 971-6463

BUSINESS PHONE: (202) 638-0080

92040922435



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 1, 1989

*plm*

Allan P. Dye, Esquire  
Webster, Chamberlain, Bean & McDivitt  
1737 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

RE: MUR 2810

Dear Mr. Dye:

The Office of the General Counsel is in receipt of your recent letter requesting an extension of time to respond in the above-captioned matter. After considering the circumstances as detailed in your letter, this Office will grant the requested extension. Accordingly, your response is due no later than March 10, 1989.

If you have any questions, please contact Patty Reilly, the attorney assigned to this matter, at 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

*Jonathan Bernstein* - PL

BY: Jonathan Bernstein  
Acting Assistant General  
Counsel

92040922436

OGC 2002

LAW OFFICES  
WEBSTER, CHAMBERLAIN & BEAN  
1747 PENNSYLVANIA AVENUE, N. W.  
WASHINGTON, D. C. 20006  
(202) 785-9500

GEORGE D. WEBSTER  
J. COLEMAN BEAN  
ARTHUR L. HEROLD  
ALAN R. DYE  
BURRETT VAN KIRK  
C. MICHAEL DEESE  
FRANK M. NORTHAM  
GERARD P. PANARO  
JOHN W. HAZARD, JR.  
CHARLES M. WATKINS  
ROBERT M. SKELTON  
HUGH K. WEBSTER  
ANNE B. POPE

OF COUNSEL  
CHARLES E. CHAMBERLAIN

March 1, 1989

BY HAND

Patty Reilly, Esquire  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: MUR 2810  
Coalition for a Winning Ticket

Dear Ms. Reilly:

Enclosed are the Coalition for a Winning Ticket's responses to the FEC's interrogatories and request for production of documents in connection with MUR 2810.

We would also like to respond substantively to the FEC's "Factual and Legal Analysis" regarding this matter. In its Analysis, the FEC concludes that "CWT thus appears to be operating as a 'political committee' as defined by the Act". It is based on this conclusion that the FEC charges CWT with violating the Federal Election Campaign Act ("FECA"). An examination of the facts, however, demonstrates that CWT clearly is not, and never has been, a political committee.

As stated in its mailings, the sole purpose of CWT was to convince then-candidate George Bush to select a conservative running mate. In these efforts, CWT never acted at the request, on behalf, or in support of any candidate. While the FECA defines "political committee" in broad terms, the definition has been limited by the U.S. Supreme Court to apply only to "organizations that are under the control of a candidate or the major purpose of which is the nomination or election of a candidate". Buckley v. Valeo, 424 U.S. 1, 79 (1976).

Absent a specified candidate, an organization cannot be a political committee. See, Federal Election Commission v. Florida for Kennedy Committee, 681 F.2d 1281 (11th Cir. 1982); Federal Election Commission v. Machinists Non-Partisan Political League,

RECEIVED  
FEDERAL ELECTION COMMISSION  
89 MAR -1 PM 4:34

92040922437

WEBSTER, CHAMBERLAIN & BEAN

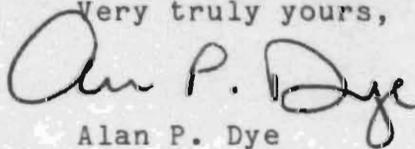
Patty Reilly, Esquire  
March 1, 1989  
Page 2

655 F.2d 380 (D.C. Cir. 1981), cert. denied, 454 U.S. 897 (1981). Both of these cases involved so-called "draft Kennedy" groups, whose purpose was to convince Senator Edward Kennedy to become a candidate for President in 1980. Based on the above-cited holding in Buckley, these organizations were determined not to be political committees under the FECA because Senator Kennedy was not a candidate.

CWT, of course, was not even a draft committee, as there was no effort to convince any person to become a candidate. Of particular relevance is United States v. National Committee for Impeachment, 469 F.2d 1135 (2d Cir. 1972), in which an organization pledged to support any candidate for election or reelection to the U.S. House of Representatives which favored a particular piece of legislation. Even though the organization was clearly supporting candidates, the court determined that "some more definite connection between candidate and committee," other than identity of political ideology, was necessary to bring the organization within the purview of the FECA. Id., at 1139. Like the defendant in that case, CWT was promoting the choice of any individual with certain well-defined political views, and therefore cannot be considered a political committee. As held in National Committee, this is true even if the FEC were to determine that CWT was, in some manner, involved with a "candidate".

Because Coalition for a Winning Ticket was not formed to support any candidate for office, we urge your office to recommend to the Commission that MUR 2810 should be dismissed.

Very truly yours,

  
Alan P. Dye

APD:pw

Attachment

92040922438

Responses of the Coalition for a Winning Ticket  
to the Federal Election Commission's Interrogatories  
and Request for Production of Documents

1. The Coalition For A Winning Ticket was formed on July 25, 1988. As a member of the Coalition, Free the Eagle Managing Director Howard Segermark offered to provide office space and accounting services. Thus, he assumed responsibility for operating the Coalition. Some Free the Eagle staff was involved in the Coalition, and it can be said that it was a project of Free the Eagle.

The Coalition included the following organizations:

- (1) The American Conservative Union
- (2) Citizen's Coalition
- (3) Coalitions For America
- (4) College Republican National Committee
- (5) The Conservative Caucus
- (6) Conservatives of Texas
- (7) Eagle Forum
- (8) Free Market Political Action Committee
- (9) Gun Owners of America
- (10) High Frontier
- (11) The National Congressional Club
- (12) National Conservative Political Action Committee
- (13) Ruff Political Action Committee
- (14) Salt PAC
- (15) State Department Watch

92040922439

- (16) National Teenage Republicans
- (17) New Hampshire Conservative Union
- (18) United Conservatives of America Political Action Committee
- (19) United Families of America
- (20) United States Defense Committee
- (21) Congressional Majority Committee
- (22) Young Americans for Freedom
- (23) Young Conservatives of Texas
- (24) Public Affairs Political Action Committee

2. The Managing Director of Free the Eagle (FTE), Mr. Howard Segermark, served as chief financial officer of the Coalition. The Treasurer of FTE, Mr. William Jacobs, shared financial responsibility for the Coalition with Mr. Segermark.

3. The total amount of receipts of the Coalition was \$36,940.00, mostly from personal appeals.

4. The total amount of disbursements was \$33,162.17.

5. Mr. Dan Perrin was principally involved in the preparation of the solicitation letter. He was assisted by Mr. Richard Viguerie.

6. Attached as exhibit A are all enclosures mailed with the letter.

7. The total number of letters mailed was 4,804.

8. The source of the mailing list was: CAPSTONE; 1315 Duke St., Alexandria, VA 22314.

92040922440

9. (a) Free the Eagle assumed the responsibility for the initial cost of the mailing and was subsequently reimbursed from funds raised.

(b) The source of funds was donations to the Coalition.

(c) The total amount of funds spent on the mailing was \$3,666.68.

(d) No written records were kept of receipts from the mailing. Mr. Perrin stated that the mailing brought in \$300-400. Mr. Segermark independently confirmed that the mailing brought in a negligible amount of contributions. Both stated that the mailing actually cost the Coalition money.

10. All responsive documents are enclosed as exhibit B.

11. There were two other mailings.

(a) The first was a mailing to delegates attending the Republican Convention. A copy of the letter is included as exhibit C.

(b) The total number of letters mailed was 4,946.

(c) The cost of the mailing was \$1,591.20.

(d) No funds were raised as a result of the mailing.

Approximately ten letters were sent by Senator Humphrey thanking financial contributors for their gifts. The only cost was for paper and postage which was provided by Free the Eagle. The Coalition received no contributions from these letters.

92040922441

ASS

GRANITE & CO

06C 2116

LAW OFFICES  
WEBSTER, CHAMBERLAIN & BEAN  
1747 PENNSYLVANIA AVENUE, N. W.  
WASHINGTON, D. C. 20006

GEORGE D. WEBSTER  
J. COLEMAN BEAN  
ARTHUR L. HEROLD  
ALAN P. DYE  
BURKETT VAN KIRK  
C. MICHAEL DEESE  
FRANK M. NORTHAN  
GERARD P. PANARD  
JOHN W. HAZARD, JR.  
CHARLES H. WATRINS  
ROBERT M. SKELTON  
HUGH K. WEBSTER  
ANNE B. POPE

(202) 785-9500  
FAX: (202) 835-0243

OF COUNSEL  
CHARLES E. CHAMBERLAIN  
CONSULTANT  
A. L. SINGLETON

March 8, 1989

BY HAND

Patty Reilly, Esquire  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: MUR 2810  
Coalition for a Winning Ticket

Dear Ms. Reilly:

Enclosed are the exhibits to CWT's responses to the FEC's interrogatories and request for production of documents. I apologize for the inadvertant failure to include them with CWT's responses.

Very truly yours,  
*Alan P. Dye*  
Alan P. Dye

Enclosure

92040922442

RECEIVED  
FEDERAL ELECTION COMMISSION  
89 MAR -9 PM 3:33

# COALITION FOR A WINNING TICKET

GORDON HUMPHREY, U.S. SENATE  
Chairman

## Press Release

STATEMENT OF SENATOR GORDON J. HUMPHREY  
CHAIRMAN, COALITION FOR A WINNING TICKET  
AUGUST 4, 1988

Today, 25 member organizations and 48 conservative leaders, representing thousands of conservative activists nationwide, announce their banding together to stave off an impending disaster for the Republican party in November.

The membership of the Coalition for a Winning Ticket believe it is imperative that Vice President Bush choose a running mate who will be complementary rather than merely compatible. We believe George Bush should choose someone who will bring strength among groups where the ticket is now weak.

We believe it is imperative that George Bush choose a running mate who will bring strength to our ticket by sending a message to the conservative majority within the Republican Party that they are wanted, that they are needed, and that they will have a place in a Bush administration.

We believe George Bush must send a message to conservative Americans, Republican, Democratic and Independent alike. He must choose a running mate with whom Middle America can identify. The problem of the Bush campaign is that it is attracted to establishment blue-bloods. What the Bush ticket needs is a transfusion of red corpuscles from the conservative wing of our party. If George Bush selects an establishment Republican as his running mate, we believe we are headed for a disaster in November. If he selects a Reagan conservative, we can win.

We believe George Bush can win if he reassembles the majority coalition of 1980 and 1984, which consists of Reagan Democrats and Independents, and the bulk of the Republican Party. But George Bush can reassemble that coalition only if he chooses a conservative running mate.

George Bush cannot win by trying to out-Democrat the Democrats, or by trying to out-Dukakis Michael Dukakis. He cannot win by offering Republican versions of Democrat programs. He cannot win by talking about being the "education President" or by pandering to the special interest groups whose members are going to vote for Dukakis no matter what.

### Profile of Acceptable Conservative Candidates

We believe George Bush should choose someone who is 1) committed to a vigorous foreign policy based on peace through strength and dedicated to rolling back the frontiers of communism; 2) who recognizes that the Soviet Union continues to seriously threaten the West, notwithstanding the public relations skills of Mikhail Gorbachev; 3) who supports a publicly-avowed commitment to early deployment of the SDI Space Shield unencumbered by the ABM treaty; 4) who supports military aid to the freedom fighters in Nicaragua, Afghanistan, Cambodia, Angola and Mozambique; 5) who recognizes the vital strategic importance of an anti-communist southern Africa.

92040922443

We believe George Bush must choose someone committed to a domestic agenda which includes: 1) unequivocal support for the right-to-life plank of the Republican platform; 2) a presidential veto of all appropriations bills which fund abortion, except in life-threatening cases; 3) unequivocal opposition to tax increases; 4) line item veto authority; 5) breaking the monopoly in the education of our children; 6) enterprise zones; 7) measures to give public housing tenants a stake in the future.

The Bush campaign so far has turned off conservatives for example by the selection of an keynote speaker who disagrees with President Reagan and most conservatives on several cardinal issues. The selection as co-advisor on education matters of Terrell Bell, a notorious Reagan-basher, is the latest bitter disappointment.

The Coalition for a Winning Ticket has secured office space in Washington and in New Orleans. We are working actively to united conservatives in our plea to George Bush. We will be active outside the convention hall, speaking with the press, and we are considering parliamentary maneuvers within the convention up to and including encouraging the nomination of an alternative vice-presidential candidate.

Conservatives have worked too long and too hard to let the Republican Party be taken over by it's minority, establishment wing. We will not be disenfranchised. We want George Bush to win. But he must help us, too.

92040922444

**SEN. HUMPHREY (at the GOP  
Convention in New Orleans):  
Tell the other delegates and tell  
George Bush here's where I stand!**

Place 25¢  
postage  
here

Senator Gordon Humphrey  
COALITION FOR A WINNING TICKET  
1100 Poydras Street  
Suite 1205  
New Orleans, LA 70167

Dear Senator Humphrey:

I'm glad to learn that you've formed a Coalition to urge Mr. Bush to select a Conservative for Vice President to campaign this fall on a solid conservative platform.

\_\_\_\_\_ You may include my name when you release to the press the updated names of the members of your Coalition For A Winning Ticket.

\_\_\_\_\_ Please do not include my name when you release to the press the updated names of the members of your Coalition For A Winning Ticket, even though I support your efforts.

Enclosed is my maximum donation in the amount circled below:

\$250 \$500 \$750 \$1,000 Other amount \$ \_\_\_\_\_

\_\_\_\_\_  
(Signature)

Contributions to Coalition For A Winning Ticket are not deductible as charitable contributions for Federal Income Tax purposes.

9 2 0 4 0 9 2 2 4 4 5

Cost Breakdown of Coalition For A Winning Ticket.  
"Exhibit A" Mailing

CMB INTERNATIONAL	Envelopes	\$ 613.80
	Letter	175.00
	Press Release	450.00
	Reply Form	87.50
	Cut Charge	30.00
	Inserting	400.00
	Sales Tax	<u>105.38</u>
		1861.68
CAPSTONE	Mailing List	550.00
CMB INTERNATIONAL	Postage	<u>1255.00</u>
		1805.00
		1861.68
		<u>1805.00</u>
	Total	3666.68

92040922446

*[Handwritten initials]*

PAY TO THE ORDER OF

*First American*  
*Telex number and gift*

*Stop*  
*gr*  
*10/28/54*  
*154*  
*540*

FOR *Baker's* **1st AMERICAN** *check*

⑆054000043⑆

⑆1564⑆3⑆

⑆0000125500⑆

*W. S. Sargent*

92040922447

92040922448

*Paul Andrew  
Hartman*  
0003 34031

PAID BY THE ORDER OF THE  
FIRST AMERICAN  
BANK N.A.  
WASHINGTON, D.C.  
20042-7209  
154 154

AUG -9 93 1

AG 09

154

154

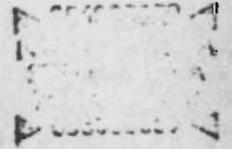
9 2 0 4 0 9 2 2 4 4 9

PAY TO THE ORDER OF Cap Store 1982 <sup>154</sup> 10/26  
one hundred and twenty-five 125.00 DOLLARS  
 FOR Wash Al Segen  
**1st AMERICAN**  
FIRST AMERICAN BANK, INC. MEMPHIS, TN 38103  
 ⑆051000013⑆ 3 456 453⑆ ⑆0052100000⑆

92040922450

FOR DEPOSIT ONLY  
CAPSTONE LISTS, INC.  
ACCT. #2001365

0479 23130



AG 11 83

AG 12



92040922450

AG 11 83

THE AMERICAN  
CENTRAL BANK, N.A.  
BALTIMORE, MD

92040922450

9 2 0 4 0 9 2 2 4 5 1

PAY TO THE ORDER OF

*Capstone*

*Four Hundred and Twenty-Five* DOLLARS

*Aug 8* 1954

*1055* 540

*154*

*425.00*

1st AMERICAN BANK

FOR *Frank Mc*

#0510000431#

3 156 1631#

#0052100000#

*W. S. Jensen*

92040922452

FOR DEPOSIT ONLY  
CAPSTONE LISTS, INC.  
ACCT. #2001365

0479 23136



APR 11 03

APR 12



130238261

APR 11 2 5

THE FIRST BANK  
CENTRAL BANK, N.J.  
BALTIMORE, MD

122069840

9 2 0 4 0 9 2 2 4 5 3

PAY TO THE ORDER OF

*CHESTER W. HENRY* *1088 5/4*

*FIVE THOUSAND FOUR HUNDRED AND NINETY-FIVE AND 10/100*

**1ST AMERICAN**  
FIRST AMERICAN BANK CORPORATION  
MEMPHIS, TENNESSEE 38103

FOR *Printing & Supplies*

⑆054000043⑆

3 456 463⑆

⑆0000559518⑆

*[Signature]*



# CAPSTONE

1315 Duke Street, Suite 200  
Alexandria, VA 22314-0998 • (703) 683-4131

## INVOICE

INVOICE NO. 32312

DATE 08/02/88

*Rec'd  
8/19/88*

**SOLD TO:**

COMMITTEE FOR A WINNING TICKET  
25 E STREET, N.W. 8th FLOOR  
WASHINGTON, D.C. 20001  
ATTN: HOWARD SEGERMARK

**SHIPPED TO:**

SEGERMARK COMPANY  
25 E STREET, N.W. 8th FLOOR  
WASHINGTON, D.C. 20001  
ATTN: HOWARD SEGERMARK

CAPSTONE ORDER NO.	CUSTOMER ORDER NO.	SHIPPED VIA	SHIP DATE	TERMS
7507		BEST WAY		PREPAYMENT REQUIRED
QUANTITY	DESCRIPTION		PRICE	AMOUNT
5,000	BLACK TIE REPUBLICANS \$1,000+ DONORS Shipping/Handling DO NOT DUPLICATE		\$ 20.00/M	\$ 400.00 \$ 25.00
			<b>TOTAL DUE</b>	<b>\$ 425.00</b>

Keycode :  
Maildate : 08/08/88  
Offer : HIGH \$\$

Past due invoices are subject to 1% interest per month.

9 2 0 4 0 9 2 2 4 5 5

August 1, 1988

Dear Delegate:

Please, if you believe it's essential (as I certainly do) for George Bush to choose a conservative running mate, take the time to read the enclosed press release which I issued on July 27th, during a news conference in the Senate Press Gallery.

In less than two weeks the Republican Convention begins in New Orleans. More than ever grassroots conservatives need to take the lead in assuring that we have a winning ticket and a winning platform. That is why I have formed the "Coalition For A Winning Ticket."

I very much need the support of you and other conservative leaders to lend your name to this important undertaking. We need to communicate to the Vice President, his top aides and the public, that conservatives do not feel adequately represented in the Convention, in the campaign and on the ticket. The Coalition For A Winning Ticket has planned daily and separate meetings for delegates and non delegate leaders, press conferences, and Convention floor activities.

There is a cause worth fighting for! There are issues worth fighting for! Right to Life! Aid to the Contras and other freedom fighters! Right to keep and bear arms! Balanced Budget Amendment! Line Item Veto! Deployment of SDI! No Tax Hike! Defunding the Left! And on and on!

If you agree with me, please let me know where you will be staying so that I can get in touch with you in New Orleans by returning the enclosed reply form today.

I will be holding a press conference soon and if you get your reply back to me quickly I will include your name as a member of our coalition. I will be in touch with you before the convention with a list of conservative leaders that have joined the "Coalition for A Winning Ticket."

Best Regards,

Gordon Humphrey

92040922456

United States Senator

Dear Senator Humphrey, I am pleased to learn that you are forming a Coalition to urge George Bush to select a conservative for a Vice President to campaign this fall on a solid conservative platform.

You may include my name when you release to the press the names of the members of your Coalition For A Winning Ticket.

Address at the Convention \_\_\_\_\_.

\_\_\_\_\_.

Phone: \_\_\_\_\_.

Signature \_\_\_\_\_.

I would also like to give my financial support. Enclosed is my optional \$100.00 membership fee. Other \_\_\_\_\_.

If you have any questions, please write: Dan Ferrin, Executive Director, The Coalition For A Winning Ticket, 25 E Street N.W. 8th Floor, Washington, D.C. 20001 or call (202) 638-0080.

92040922457

*[Handwritten initials]*

PAY TO THE ORDER OF

*one thousand, two hundred and twenty-five dollars*

*[Handwritten initials]*

*1st*

*American*

*August 1*

*1988*

FOR *Cashiers Check for CWB*

**1st AMERICAN**  
FIRST AMERICAN BANK CORPORATION

⑆0510000013⑆

3 456 463⑆

⑆0000127500⑆

*[Handwritten signature]*

9 2 0 4 0 9 2 2 4 5 8

U 1

*(Handwritten scribble)*

PAID  
AUG 1 '88

PAID  
AUG 1 '88

# 42542

*C. C. C. C.*

AG  
: **ACT**  
:

15151510

9204092245

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED  
MAY 19 AM 9:55

In the Matter of )  
 )  
Coalition for a Winning Ticket ) MUR 2810  
and Howard Segermark, as treasurer )

**SENSITIVE  
EXECUTIVE SESSION  
JUN 01 1989**

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On January 24, 1989, the Commission found reason to believe the Coalition for A Winning Ticket ("CWT") and its treasurer violated 2 U.S.C. §§ 433, 434, and 441d. The basis of the Commission's determination was a fundraising letter from this organization requesting contributions of "at least \$250" in order "to convince George Bush to pick a conservative as his running mate if we are to defeat liberal Michael Dukakis." CWT Fundraising Letter at 1. The letter further noted that CWT had "already committed to a budget of \$50,000." Because CWT appeared to have exceeded the Act's \$1,000 threshold for becoming a political committee, but had not registered and reported with the Commission, and had not placed a disclaimer notice on the fundraising letter, the Commission found reason to believe the CWT and its treasurer violated the previously-noted sections of the Act.

Also, on January 24, 1989, the Commission authorized a request for documents and interrogatories for CWT and its treasurer. Because it was unclear whether CWT's address was current, copies of the Commission's notification letter were sent to the signatory of the letter, Senator Gordon Humphrey, as well as Dan Perrin, identified in the letter as Senator Humphrey's executive assistant.

92040922460

## II. STATUS OF THE INVESTIGATION TO DATE

### 1. The Responses

On February 9, 1989, this Office received a response from Howard Segermark. This response states that CWT was a project of Free the Eagle ("FTE"), a 501(c)(4) non-profit corporation.<sup>1/</sup> The response identifies Senator Humphrey as an honorary chairman of the project, but he is said to have "no official capacity other than this role." CWT First Response at 1.<sup>2/</sup>

On March 1, 1989, through counsel, CWT responded to the Commission's interrogatories. This response asserts that CWT was formed on July 25, 1988 and was composed of twenty-four organizations, with Mr. Segermark serving as "chief financial officer."<sup>3/</sup> Id. at 2. The fundraising letter in question was prepared by Dan Perrin with assistance by Richard Viguerie. Id. This letter included a press release by Senator Humphrey; 4,804 letters were mailed using a commercial list. Respondents also provide a copy of the press release that was mailed with this fundraising letter. It notes that CWT was considering "parliamentary maneuvers" at the convention including

<sup>1/</sup> This response was written on the letterhead of Free the Eagle. See Attachment One.

<sup>2/</sup> A letter sent to Republican convention delegates from Senator Humphrey (Attachment 1, pp. 21-22), as well as the letter noted in the First General Counsel's Report, however, state that Senator Humphrey formed CWT.

<sup>3/</sup> Mr. Segermark is thus considered to be CWT's treasurer.

92040922461

encouraging the nomination of an alternative vice-presidential candidate. See Attachment 1, page 9.

9 2 0 4 0 9 2 2 4 6 2

CWT also mailed a second letter signed by Senator Humphrey to 4,946 Republican convention delegates. This delegate letter notes that CWT needed to "communicate to the Vice President, his top aides and the public that conservatives do not feel adequately represented in the Convention, in the campaign and on the ticket." This letter states that CWT planned convention activities including "daily and separate meetings for delegates and non delegate leaders, press conferences, and convention floor activities." Id. A return letter provided delegates with an opportunity to have their names included in a press release of CWT members. This return letter also states: "I would also like to give my financial support. Enclosed is my optional \$100 membership fee. Other \_\_\_\_\_." Id. The second response states that no funds were raised as a result of this delegate mailing. According to the interrogatories, between July 1, 1988 and December 31, 1988 CWT raised \$36,940 and disbursed \$33,162.17.

This response also reveals that FTE provided both funds and services for CWT. Specifically, FTE advanced \$3,666.68 in funds for the CWT fundraising letter, and also provided office space, accounting services and staff for CWT's efforts.

## 2. Defenses Raised

CWT asserts that it cannot be a political committee under the Act because it has never "acted at the request, on behalf of,

or in support of any candidate." Id. at 1. Citing FEC v. Machinists Non-Partisan Political League, 655 F.2d 380 (D.C. Cir.), cert. denied 454 U.S. 897 (1981), respondents argue that because it was promoting the selection of any individual meeting certain established criteria, and not one specific candidate, it is outside the judicial construction of a political committee.

It is the opinion of the Office of the General Counsel that respondents' reliance on Machinists is misplaced. The Act was amended in 1979 to require each treasurer of a political committee to file reports of receipts and disbursements. Prior to that time, the Act required only treasurers of political committees supporting a candidate or candidates to file. See H.R. Rep. No. 422, 96th Cong., 1st Sess. at 9 (1979), reprinted in FEC, Legislative History of Federal Election Campaign Act Amendments of 1979 at 199 (GPO 1983). Machinists also clearly indicates that under the 1979 Amendments, draft committees are required to report to the Commission. 655 F.2d at 395. The Act defines a political committee as any group of persons making contributions or expenditures aggregating in excess of \$1,000 for the purpose of influencing a federal election. See 2 U.S.C. § 431(4)(A), (8)(A)(i). Thus, because CWT was composed of a group of persons that raised and spent over \$30,000 directed towards influencing the nomination of a candidate for vice president, a federal office, respondents are within the Act's definition of a political committee.

92040922463

III. ADDITIONAL REASON TO BELIEVE RECOMMENDATIONS

As discussed above, it appears CWT has qualified as a political committee. Moreover, CWT has accepted funds and services from FTE, a corporation. Pursuant to 2 U.S.C. § 441b(a), corporations are prohibited from making contributions in connection with a federal election. 2 U.S.C. § 441b(a). Political committees are prohibited from accepting corporate contributions. 2 U.S.C. § 441b(a). A corporate contribution is defined to include anything of value. 2 U.S.C. § 441b(b). Because FTE advanced funds and services to CWT, this Office recommends that there is reason to believe these two entities violated 2 U.S.C. § 441b(a).<sup>4/</sup>

At this juncture, further investigation is needed in this matter regarding the relationship between CWT and FTE. It is unclear how closely related these organization are, the extent and scope of FTE's assistance, and FTE's involvement with the fundraising drives. Because Howard Segermark, as managing director of FTE and as treasurer of CWT, appears to be the person best able to respond to these questions, this Office recommends that the Commission approve a subpoena for deposition of Mr. Segermark. Additionally, CWT's response also notes a thank you letter from Senator Humphrey. Although apparently responsive to the Commission's document request, it was not provided by

<sup>4/</sup> It is also possible that CWT is so intertwined with FTE that it should not be considered a separate entity that could be a political committee. In that event, violations of only section 441b by FTE would be implicated. At this juncture, there is insufficient information to make such a determination.

92040922464

respondents. Accordingly, the attached letter requests a copy of this thank you letter.

**IV. RECOMMENDATIONS**

1. Find reason to believe Coalition For A Winning Ticket and Howard Segermark, as treasurer, violated 2 U.S.C. § 441b(a).
2. Find reason to believe Free the Eagle violated 2 U.S.C. § 441b(a).
3. Approve the attached Factual and Legal Analyses, Subpoena and Letters.

Lawrence M. Noble  
General Counsel

May 19, 1989  
Date

BY: George F. Riskel  
George F. Riskel  
Acting Associate General  
Counsel

Staff Person: Patty Reilly

**Attachments**

1. CWT Responses (3)
2. Subpoena
3. Letters
4. Factual and Legal Analyses (2)

92040922465



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE  
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JOSHUA MCFADDEN  
COMMISSION SECRETARY *JM*

DATE: MAY 22, 1989

SUBJECT: OBJECTION TO MUR 2810 - General Counsel's Report  
Signed May 19, 1989

The above-captioned document was circulated to the Commission on Friday, May 19, 1989 at 12:00 p.m.

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

- Commissioner Aikens \_\_\_\_\_
- Commissioner Elliott \_\_\_\_\_ X \_\_\_\_\_
- Commissioner Josefiak \_\_\_\_\_
- Commissioner McDonald \_\_\_\_\_
- Commissioner McGarry \_\_\_\_\_
- Commissioner Thomas \_\_\_\_\_

This matter will be placed on the meeting agenda for meeting date have not been assigned.

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

92040922466

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Coalition for a Winning Ticket) MUR 2810  
and Howard Segermark, as )  
treasurer )

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of June 1, 1989, do hereby certify that the Commission decided by a vote of 5-1 to take the following actions in MUR 2810:

1. Find reason to believe Coalition For A Winning Ticket and Howard Segermark, as treasurer, violated 2 U.S.C. § 441b(a).
2. Find reason to believe Free the Eagle violated 2 U.S.C. § 441b(a).
3. Approve the Factual and Legal Analyses, Subpoena and Letters attached to the General Counsel's report dated May 19, 1989.

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

Attest:

June 1, 1989  
Date

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

92040922467



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 6, 1989

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Alan Dye, Esquire  
Webster, Chamberlain & Bean  
1747 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

RE: MUR 2810  
Coalition for A Winning Ticket  
and Howard Segermark,  
as treasurer

Dear Mr. Dye:

On February 1, 1989, your clients were notified that the Federal Election Commission had found the reason to believe your clients violated 2 U.S.C. §§ 433, 434, and 441d, provisions of the Federal Election Campaign Act of 1971, as amended.

Additionally, on June 1, 1989, the Commission further determined that the Coalition For A Winning Ticket and Howard Segermark, as treasurer, violated 2 U.S.C. § 441b(a). The Factual and Legal Analysis, which formed a basis for the Commission's most recent determination, is attached for your information.

The Commission acknowledges receipt of your response in this matter. However, it appears that a copy of a thank you letter from Senator Humphrey to financial contributors, noted at page 3 of your response, was not provided. The Commission requests a copy of this letter.

Pursuant to its investigation of this matter, the Commission has issued the attached subpoena requiring Mr. Segermark to appear and give sworn testimony on June 28, 1989, which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, U.S. Code.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00 plus mileage at the rate of 21 cents per mile. Your client will be given a check for the witness fee and mileage at the time of the deposition.

92040922468

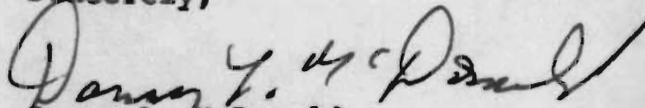
Plan

Alan Dye, Esquire  
Page 2

Within two days of your receipt of this notification, please confirm the scheduled appearance with Patty Reilly, the attorney assigned to this matter.

If you have any questions, please contact Ms. Reilly at (202) 376-5690.

Sincerely,

  
Danny L. McDonald  
Chairman

Enclosures  
Subpoena  
Factual and Legal Analysis

92040922469

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)  
)  
)

MUR 2810

SUBPOENA

To: Howard Segermark, treasurer  
Coalition for A Winning Ticket  
c/o Alan Dye, Esquire  
Webster, Chamberlain & Bean  
1747 Pennsylvania Avenue, N.W.  
Washington, DC 20006

Pursuant to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby subpoenas you to appear for deposition with regard to MUR 2810. Notice is hereby given that the deposition is to be taken on June 28, 1989 in Room 647 at 999 E Street, N.W., beginning at 10 a.m. and continuing each day thereafter as necessary.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., this 2nd day of

*June* 1989.

*Danny L. McDonald*  
\_\_\_\_\_  
Danny L. McDonald  
Chairman  
Federal Election Commission

ATTEST:

*Marjorie W. Emmons*  
\_\_\_\_\_  
Marjorie W. Emmons  
Secretary to the Commission

92040922470

FEDERAL ELECTION COMMISSION  
FACTUAL AND LEGAL ANALYSIS

MUR 2810

Respondent: Coalition for a Winning Ticket and  
Howard Segermark, as treasurer

Coalition For A Winning Ticket ("CWT") may have qualified as a political committee by making expenditures aggregating in excess of \$1,000. See 2 U.S.C. § 431(4)(A). CWT has accepted funds and services from Free the Eagle ("FTE"), a corporation.

Pursuant to 2 U.S.C. § 441b(a), corporations are prohibited from making contributions in connection with a federal election. 2 U.S.C. § 441b(a). Political committees are prohibited from accepting corporate contributions. 2 U.S.C. § 441b(a). A corporate contribution is defined to include anything of value. 2 U.S.C. § 441b(b). Because FTE advanced funds and services to CWT, there is reason to believe Coalition For a Winning Ticket, and Howard Segermark, as treasurer, violated 2 U.S.C. § 441b(a).

92040922471



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 6, 1989

Howard Segermark  
Managing Director  
Free The Eagle  
25 E Street N.W.  
Washington, D.C. 20001

RE: MUR 2810  
Free The Eagle, Inc.

Dear Mr. Segermark:

On June 1, 1989, the Federal Election Commission found that there is reason to believe Free The Eagle violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against Free The Eagle, 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 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 Free The Eagle, 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.

92040922472

Howard Segermark  
Page 2

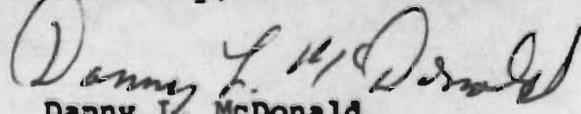
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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

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

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

Sincerely,

  
Danny I. McDonald  
Chairman

Enclosures  
Factual and Legal Analysis  
Procedures  
Designation of Counsel Form

92040922473

FEDERAL ELECTION COMMISSION  
FACTUAL AND LEGAL ANALYSIS

MUR: 2810

Respondent: Free The Eagle

The Commission previously determined that Coalition For A Winning Ticket ("CWT") may have qualified as a political committee by making expenditures aggregating in excess of \$1,000. See 2 U.S.C. § 431(4)(A). CWT has accepted funds and services from Free the Eagle ("FTE"), a corporation. Pursuant to 2 U.S.C. § 441b(a), corporations are prohibited from making contributions in connection with a federal election. 2 U.S.C. § 441b(a). Political committees are prohibited from accepting corporate contributions. 2 U.S.C. § 441b(a). A corporate contribution is defined to include anything of value. 2 U.S.C. § 441b(b). Because FTE advanced funds and services to CWT, there is reason to believe Free The Eagle violated 2 U.S.C. § 441b(a).

92040922474

666 3208



# Free the Eagle

Howard J. Ruff - Chairman of the Board

Howard Segermark -  
Managing Director

June 26, 1989

BY HAND

Ms. Patty Reilly , Esquire  
Federal Election Commission  
999 E St., N.W.  
Washington , D.C. 20463

RE: MUR 2810  
Free the Eagle, Inc.

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
JUN 26 PM 2:49

92040922475

Dear Ms. Reilly:

We do not believe that Free the Eagle violated 2 U.S.C. Sec. 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended.

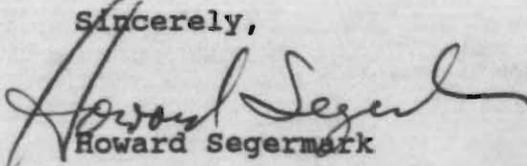
We concur in and fully support the response of March 1, 1989 from Alan P. Dye, counsel for the Coalition for a Winning Ticket. This response demonstrates the fact that the Coalition was not formed to support any candidate for office and therefore was not a political committee.

It was and always has been Free the Eagle's understanding that the Coalition was not a political committee and all actions and fund advances were made with this in mind. Without that understanding and assurances that it was not such a committee, we would not have participated in its activities.

It should further be noted, that all advances to the Coalition have been fully repaid to Free the Eagle.

In view of the above, I hope your office will find it appropriate to recommend to the commission that MUR 2810 be dismissed.

Thank you for your consideration.

Sincerely,  
  
Howard Segermark

LAW OFFICES  
WEBSTER, CHAMBERLAIN & BEAN  
1747 PENNSYLVANIA AVENUE, N. W.  
WASHINGTON, D. C. 20006  
(202) 785-9500

GEORGE D. WEBSTER  
J. COLEMAN BEAN  
ARTHUR L. HEROLD  
ALAN P. DYE  
BURRETT VAN KIRK  
C. MICHAEL DEESE  
FRANK M. NORTHAM  
GERARD P. PANARO  
JOHN W. HAZARD, JR.  
CHARLES M. WATKINS  
ROBERT M. SKELTON  
RUGH K. WEBSTER  
ANNE B. POPE

OF COUNSEL  
CHARLES E. CHAMBERLAIN

March 1, 1989

BY HAND

Patty Reilly, Esquire  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: MUR 2810  
Coalition for a Winning Ticket

Dear Ms. Reilly:

Enclosed are the Coalition for a Winning Ticket's responses to the FEC's interrogatories and request for production of documents in connection with MUR 2810.

We would also like to respond substantively to the FEC's "Factual and Legal Analysis" regarding this matter. In its Analysis, the FEC concludes that "CWT thus appears to be operating as a 'political committee' as defined by the Act". It is based on this conclusion that the FEC charges CWT with violating the Federal Election Campaign Act ("FECA"). An examination of the facts, however, demonstrates that CWT clearly is not, and never has been, a political committee.

As stated in its mailings, the sole purpose of CWT was to convince then-candidate George Bush to select a conservative running mate. In these efforts, CWT never acted at the request, on behalf, or in support of any candidate. While the FECA defines "political committee" in broad terms, the definition has been limited by the U.S. Supreme Court to apply only to "organizations that are under the control of a candidate or the major purpose of which is the nomination or election of a candidate". Buckley v. Valeo, 424 U.S. 1, 79 (1976).

Absent a specified candidate, an organization cannot be a political committee. See, Federal Election Commission v. Florida for Kennedy Committee, 681 F.2d 1281 (11th Cir. 1982); Federal Election Commission v. Machinists Non-Partisan Political League,

92040922476

WEBSTER, CHAMBERLAIN & BEAN

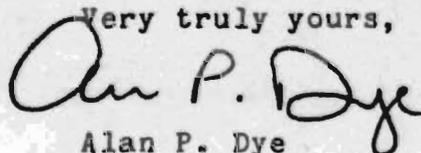
Patty Reilly, Esquire  
March 1, 1989  
Page 2

655 F.2d 380 (D.C. Cir. 1981), cert. denied, 454 U.S. 897 (1981). Both of these cases involved so-called "draft Kennedy" groups, whose purpose was to convince Senator Edward Kennedy to become a candidate for President in 1980. Based on the above-cited holding in Buckley, these organizations were determined not to be political committees under the FECA because Senator Kennedy was not a candidate.

CWT, of course, was not even a draft committee, as there was no effort to convince any person to become a candidate. Of particular relevance is United States v. National Committee for Impeachment, 469 F.2d 1135 (2d Cir. 1972), in which an organization pledged to support any candidate for election or reelection to the U.S. House of Representatives which favored a particular piece of legislation. Even though the organization was clearly supporting candidates, the court determined that "some more definite connection between candidate and committee," other than identity of political ideology, was necessary to bring the organization within the purview of the FECA. Id., at 1139. Like the defendant in that case, CWT was promoting the choice of any individual with certain well-defined political views, and therefore cannot be considered a political committee. As held in National Committee, this is true even if the FEC were to determine that CWT was, in some manner, involved with a "candidate".

Because Coalition for a Winning Ticket was not formed to support any candidate for office, we urge your office to recommend to the Commission that MUR 2810 should be dismissed.

Very truly yours,



Alan P. Dye

APD:pw

Attachment

92040922477

THE DEPOSITION OF HOWARD SEGERMARK, TAKEN JUNE 28, 1989, IS  
LOCATED AT THE END OF THIS FILE.

9 2 0 4 0 9 2 2 4 7 8



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 14, 1989

Alan Dye, Esquire  
Webster, Chamberlain, and Bean  
1737 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

Re: MUR 2810  
Coalition For A Winning  
Ticket and Howard  
Segermark, as treasurer

Dear Mr. Dye:

On June 28, 1989, your client, Howard Segermark, was deposed in connection with the Commission's investigation in the above-captioned matter. At that deposition your client agreed to produce the following documents and materials.

1. Letters sent by the Coalition For A Winning Ticket ("CWT") or Dan Perrin regarding CWT's formation or activities prior to the July 25, 1988 meeting in Senator Humphrey's office.
2. A list of all contributors to CWT
3. All receipts evidencing expenses from CWT's meetings in the Washington, D.C. area
4. The dates of all meetings held by CWT in the Washington D.C. area
5. A copy of CWT's news release discussing George Bush's naming of Dan Quail as his choice for vice-presidential nominee
6. Writings evidencing phone charges or billings from Free the Eagle ("FTE") to CWT
7. A copy of each of CWT's newsletters
8. All bank statements for and check copies from CWT's account
9. A copy of the July 27, 1989, press release referred to in CWT's August 1, 1988 letter to delegates

92040922479

10. Documentation for the \$5,595.18 check payable to CMB International for Printing and Mailing, dated August 11, 1988, included with your response to the Commission's Interrogatories and Request for Production of Documents ("Interrogatory Response"). Documentation for the \$1,275 check payable to "1st American" for "Cashiers Check for CMB International" dated August 1, 1988 included with your Interrogatory Response.
11. A copy of the check used to pay for CWT's rent in New Orleans
12. A breakdown of all expenses paid by or on behalf of CWT in New Orleans, indicating whether each such expense was paid by CWT, FTE, or any other person
13. Senator Humphrey's comprehensive report discussing CWT's activities
14. A copy of Senator Humphrey's testimony at the Republican Convention regarding rules
15. Copies of all letters written by Dan Perrin to persons or organizations regarding joining CWT
16. Copies of all CWT press releases not already provided
17. Copies of all FTE checks written on behalf of CWT
18. Materials provided by the public relations firm hired by CWT

Furthermore, you also agreed to provide information regarding each of the organizations listed under question one, pages 1 and 2, of CWT's Interrogatory Response. Specifically, for each organization, please detail:

a) the purpose of the organization; b) its location; c) person(s) at the organization who were contacted regarding CWT; d) officers and directors; e) its sources of funding; f) amount of dues or contributions paid to CWT; g) whether the organization conducted fundraising activity on behalf of CWT; h) whether the organization supported or opposed any person for president or vice president; i) whether the organization is incorporated; and whether the organization issues any publications, and if so, whether CWT was mentioned in such publications.

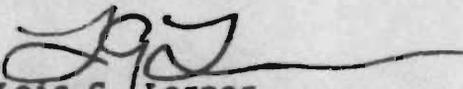
92040922480

You are requested to provide this information within twenty days of your receipt of this letter. If you have any questions please contact Patty Reilly at 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

By:

  
Lois G. Lerner  
Associate General Counsel

92040922481

89 JUL 20 AM 11:32

**SENSITIVE**

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of	)	
	)	MUR 2810
Coalition for a Winning	)	
Ticket and Howard Segermark,	)	
as treasurer	)	
Free The Eagle, Inc.	)	

**COMPREHENSIVE INVESTIGATIVE REPORT # 1**

**BACKGROUND**

On January 24, 1989, the Commission found reason to believe Coalition for a Winning Ticket ("CWT") and its treasurer violated 2 U.S.C. §§ 433, 434, and 441d. Underlying the Commission's determination was a fundraising letter sent by CWT requesting contributions "of at least \$250" in order "to convince George Bush to pick a conservative as his running mate if we are to defeat liberal Michael Dukasis". CWT Fundraising Letter at 1. Because CWT appeared to have exceeded the Act's \$1,000 threshold for becoming a political committee, but had not registered or reported with the Commission, and had not placed a disclaimer on the fundraising letter, the Commission found reason to believe the respondents violated these sections of the Act.

On June 1, 1989, based upon information uncovered during the course of the investigation, the Commission found reason to believe CWT violated 2 U.S.C. § 441b. The basis of the Commission's determination was that it appeared CWT had accepted goods and services from Free the Eagle ("FTE"), an incorporated organization. Also on that date the Commission determined that

92040922482

FTE violated 2 U.S.C. § 441b and approved a subpoena for a deposition by Howard Segermark, treasurer of CWT and managing director of FTE.

Mr. Segermark's deposition was taken on June 28, 1989. During the course of that proceeding, Mr. Segermark referenced a number of documents and materials relating to the Commission's investigation and agreed to voluntarily provide these documents to this Office. Upon receipt and review of these additional materials, this Office will report to the Commission with appropriate recommendations.

Lawrence M. Noble  
General Counsel

Date

7/19/89

BY:

[Signature]

Lois G. Lerner  
Associate General Counsel

Staff assigned: Patty Reilly

92040922483



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE  
GENERAL COUNSEL

FROM: *MWE* MARJORIE W. EMMONS/CANDACE M. JONES  
SECRETARY OF THE COMMISSION

DATE: JULY 25, 1989

SUBJECT: MUR 2810 - COMPREHENSIVE INVESTIGATIVE REPORT #1  
SIGNED JULY 19, 1989.

The above-captioned report was received in the Secretariat at 11:32 a.m. on Thursday, July 20, 1989 and circulated to the Commission on a 24 hour no-objection basis at 12 noon on Friday, July 21, 1989.

There were no objections to the report.

1986

92040922484

LAW OFFICES  
WEBSTER, CHAMBERLAIN & BEAN

1747 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20006

(202) 785-9500

FAX: (202) 835-0243

MEMORANDUM

GEORGE D. WEBSTER  
J. COLEMAN BEAN  
ARTHUR L. HEROLD  
ALAN P. DYE  
BURKETT VAN KIRK  
FRANK H. NORTHAM  
GERARD P. PANARO  
JOHN W. HAZARD, JR.  
CHARLES M. WATKINS  
ROBERT M. SKELTON  
HUGH K. WEBSTER  
ANNE B. POPE

OF COUNSEL  
CHARLES E. CHAMBERLAIN  
CONSULTANT  
A. L. SINGLETON

06C 3700  
Reilly

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
09 AUG -7 PM 3:29

TO: Mr. Lawrence M. Noble, General Counsel to the  
Federal Election Commission

FROM: Mr. Alan Dye, Esquire

DATE: August 7, 1989

RE: Information requested in the course of the deposition  
by Howard Segermark given on June 28, 1989, in connection  
with the Commission's Matter Under Review 2810.

Coalition For A Winning Ticket

MUR 2810

1. Attached is the letter of July 20, 1988 sent by the Coalition.
2. Names of contributors are protected from disclosure by the U.S. Constitution.
3. Attached are all receipts available from CWT's meetings in the Washington, D.C. area.
4. The dates of meetings of the CWT in Washington were July 20, July 25, and August 2.
5. Attached is a copy of CWT's news release discussing George Bush's selection of Senator Quayle as his vice-presidential running mate.
6. Attached are copies of checks from FTE to C&P Telephone and U.S. Sprint. CWT charges are shown. Attached also is a check from CWT to FTE that included the payment of CWT telephone charges.
7. Attached is a copy of CWT's newsletter.
8. Attached are all bank statements and checks of the Coalition For A Winning Ticket.

92040922485

WEBSTER, CHAMBERLAIN & BEAN

Mr. Lawrence M. Noble  
August 7, 1989  
Page 2

9. Attached is a copy of Senator Humphrey's press release of July 27, 1988.
10. Attached is a copy of the invoice CMB prepared for CWT for charges paid by CWT's check of August 11, 1989 for \$5,595.18. CMB did not prepare an invoice for the work done for CWT that was paid by the cashier's check of August 1, 1988 for \$1,275.
11. Attached are copies of the checks for CWT's rent in New Orleans.
12. Attached is a breakdown of all CWT expenses in New Orleans. The first group shows expenses paid directly to CWT. The following group shows CWT expenses that were initially paid by FTE and reimbursed to FTE by CWT.
13. Attached is Senator Humphrey's report on CWT's activities.
14. Attached is a copy of Senator Humphrey's testimony before the Republican Convention's Rules Committee.
15. Attached are copies of all letters written by Dan Perrin urging people to join the Coalition for A Winning Ticket.
16. Attached are copies of all CWT press releases.
17. Attached are copies of all FTE checks written on behalf of CWT.
18. Materials provided by the Boren Group were the press releases written in New Orleans on behalf of the Coalition For A Winning Ticket.

Also Enclosed are the CWT lapel badge and convention handouts for delegates.

Detailed information about CWT members was also requested. These groups are independent organizations not subject to FTE authority. The FEC should obtain information from these organizations directly.

92040922486

**Gordon J. Humphrey  
United States Senator  
New Hampshire**

July 20, 1988

Fellow Conservative:

Is there not a cause?

In just a few weeks before the Republican National Convention gathers in New Orleans, who will call for a strategy of victory in Central America, for the defeat of Communism in southern Africa and Afghanistan, for an end to Federal subsidies which promote abortion and homosexuality, for a timetable to deploy the Strategic Defense Initiative, for cuts in Federal spending and taxes, for a rollback of Federal regulatory authority in nearly every area from housing to health care, for an end to U.S. taxpayer subsidies to the Soviet Union and its allies?

Conservatives gained control of the Republican Party in 1964, but even when our candidates have been nominated, liberals have dominated the Executive branch ever since.

I mean to do something about this. I mean to correct the imbalance. Whereas the conservative minority in the Democratic Party is represented on its national ticket, it is ironic that the conservative majority in the Republican Party may well be shut out from participation in the election, the transition, and the four years that follow.

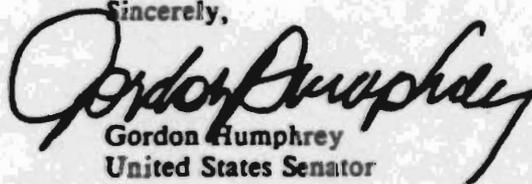
We conservatives need to do more than complain. We need to present ourselves as a constructive and essential component of a Republican victory strategy for 1988.

On Monday, July 25, I invite you to join me and several other conservative leaders in planning an effective conservative strategy which can be brought to bear in the days leading up to New Orleans, at the national convention, during the campaign, during the transition, if there is one, and during the administration which follows.

Please RSVP to Dan Perrin, Executive Director, Committee for a Winning Ticket, at (202) 638-0080. The meeting will be held at a location in the Washington, D.C. area.

With personal best wishes, I am

Sincerely,

  
Gordon Humphrey  
United States Senator

P.S. Please keep this invitation strictly confidential. No substitutes will be permitted. You will be advised of the meeting location after you notify us of your intention to be present.

92040922487

**A) Statement of Purpose**

Our goal is to mount an effort which will:

Identify and build support for conservative and Judeo-Christian political and policy objectives during the 1988 campaign and the four years which follow.

We will seek, by persuasion and strength, to build support for our objectives among the general public and within the Bush campaign so as to make the Bush candidacy more worthy of support and more electable if it becomes responsive to the concerns and objectives which we convey.

We will also seek to maximize our influence on the Bush transition, if he is elected, and on the Bush administration which would follow.

We intend to provide leadership for our cause before, during, and after the New Orleans convention, whether or not there is a Bush administration.

The degree of our success will be measured in the first instance by the Bush vice presidential choice, the Bush platform, and by publicly asserted Bush commitments with respect to personnel and procedures during a prospective Bush transition and Bush administration. *policy*

**B) Operational Priorities**

- 1) A meeting will be held as soon as possible to include only principals representing major conservative and Judeo-Christian constituencies. The meeting will be confidential. The purpose of this meeting will be to delineate the concerns which each of the constituency representatives seek to have addressed and satisfied by Vice President Bush. The meeting will also set forth specific procedural objectives, as for example, relating to representation in campaign strategy councils and on the campaign staff, personnel appointments to the executive branch during the balance of the Reagan administration, legislative and policy initiatives during the balance of the Reagan administration, participation in key elements of the transition process, personnel commitments for 1988 and 1992, and policy commitments for 1988 to 1992. Emphasis will also be placed on the assignment of Bush campaign funds.
- 2) A committee will be designated to convey these concerns and recommendations personally to the Vice President, and to elicit a specific response.
- 3) Following the meeting between the committee and the Vice President, the larger group will meet again to discuss consequent action.
- 4) If the group's requests are not met to its satisfaction, specific actions to be taken at the New Orleans convention and in the post-convention period will be considered.
- 5) The group will communicate appropriate elements of information concerning its existence, its objectives, and its activities to the media in a manner to be agreed to upon the initial meeting.
- 6) Consideration will be given to the possibility of a national information campaign, which will include briefings of state delegations, prior to and during the national convention.

92040922488

HYATT REGENCY  CRYSTAL CITY

STATEMENT

AT WASHINGTON NATIONAL AIRPORT

2799 JEFFERSON DAVIS HIGHWAY  
ARLINGTON, VIRGINIA 22202 USA  
703-486-1234

Payment shall be made immediately upon receipt of statement.

COMITTEE FOR THE WINNING TICKET  
C/O FREE THE EAGLE  
25 E ST., N.W.  
8TH FLOOR  
WASHINGTON, D.C. 20001

REMIT TO:  
HYATT REGENCY CRYSTAL CITY  
1970 CHAIN BRIDGE ROAD  
MC LEAN, VA 22109-0259

AMOUNT ENCLOSED \_\_\_\_\_

REFERENCE X-007906      DATE 10-01-88

PLEASE RETURN THIS SECTION WITH  
YOUR REMITTANCE - THANK YOU

REFERENCE	DATE	CODE	DESCRIPTION	DEBITS	CREDITS	AMOUNT DUE
	072588	CS	COFFEE SERVICE	63.58		
	072588	L	LUNCHEON	308.65		
	072588	RR	ROOM RENTAL	109.50		
	072588	PA	PAYMENT - THANKYOU!		200.00	

ACCOUNT NUMBER X-007906

BILLING DATE 10-01-88

BALANCE DUE  281.73

YOUR PAYMENT IS PAST DUE--- PLEASE CALL (703) 486-1234 EXT. 6168  
AIRPORT PLAZA ASSOCIATES O/H/A H.R. CRYSTAL CITY TAX ID #52-1215394

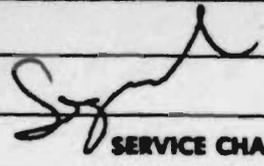
60 DAYS OLD 281.73

9 2 0 4 0 9 2 2 4 8 9

CAPITOL HILL CLUB  
PRESIDENTIAL DINING ROOM

Dinner w  
Sen. Humphrey &  
Staff of Kennedy,  
c 5434  
6000 Convent

Member's Signature

DATE	B I D	WAITER NO.	NO SERVED	TABLE NO.	CHECK NO.
8/2	B I D	77	4		D219461
<input checked="" type="checkbox"/> COF <input type="checkbox"/> SANKA <input type="checkbox"/> MILK <input type="checkbox"/> TEA					2.00
SALAD BAR					
1	Roast Chicken				11.95
1	N.Y. Steak				16.00
2	Prime Rib special				19.90
1	Omelette Bisy				3.25
1	Crab meat				5.95
1	Caesar Salad				3.75
2					
2					
1	Dessert				2.50
					65.30
SERVICE CHARGE 15%					
D.C. SALES TAX 8%					
TOTAL					

MEMBERS COPY

PLEASE KEEP FOR YOUR RECORD AND COMPARE WITH MONTHLY STATEMENT. NO OTHER COPY WILL BE SENT.

CAPITOL HILL CLUB  
PRESIDENTIAL DINING ROOM

A

c 5434

HOWARD SEGERNARK

Member's Signature

DATE	B I D	WAITER NO.	NO SERVED	TABLE NO.	CHECK NO.
8/2	B I D	77	4		D21946
<input type="checkbox"/> COF <input type="checkbox"/> SANKA <input type="checkbox"/> MILK <input type="checkbox"/> TEA					
SALAD BAR					
1	Wich				1.95
1	Coors				1.95
1	Becks				2.50
1	Jack Dan				3.75
1	M.ich				1.95
					12.10
					1
					
SERVICE CHARGE 15%					
D.C. SALES TAX 8%					
TOTAL					

MEMBERS COPY

PLEASE KEEP FOR YOUR RECORD AND COMPARE WITH MONTHLY STATEMENT. NO OTHER COPY WILL BE SENT.

12.10  
65.30  
~~77.40~~  
77.40

# COALITION FOR A WINNING TICKET

GORDON HUMPHREY, U.S. SENATE  
Chairman

## Press Release

August 15, 1988

FOR IMMEDIATE RELEASE  
CONTACT: Howard Segermark  
N.O. 504-582-2252

### HUMPHREY HAILS V.P. CHOICE

Immediately after notification of George Bush's choice of Senator Dan Quayle as his running mate, Senator Gordon Humphrey, leader of an effort of national organizations, conservative leaders, and GOP delegates, to encourage a selection of conservative V.P. nominee said, "It is hard to imagine a more sound and appropriate choice. Senator Quayle will assure that the winning coalition of the past continues with a major Republican victory at all levels this November".

"This ticket is the winning ticket Republicans wanted and this country must have. I cannot think of two men in George Bush and Dan Quayle better able to perpetuate the strong leadership at home and abroad that this nation has had thus far in the 1980's."

"They are highly qualified as well to resoundingly defeat the genuine danger posed to our national security and national future by the Dukakis, Sensten, Jackson triad. This is no time, in fact this is too dangerous a time, for America to risk the erratic course urged by the radical elements controlling the national Democratic party. This Republican ticket ~~offers~~ offers the best hope for firm hands on a steady helm.

"The Coalition for a Winning Ticket goals have been met."

*114 thinking  
5/11 Eby  
762  
0112*

*M... News Service*

- 30 -

*Bill Davis  
9-11-84*

*INSK:  
303  
304*

*CWT →  
CWT -*

92040922491





**C&P Telephone**  
A Bell Atlantic Company

Acct 202 638 0080 368 24

Sep 11 1988

**Summary**

Amount Past Due  
 \$2722.20 Last bill  
 -836.66 Payments  
 1885.54 Balance overdue from last bill—please pay promptly

Current charges  
 354.37 C&P Telephone  
 1406.58 AT&T  
 9.71 NTL Telephone Svcs  
 \$1770.66 Subtotal Pay C&P by Sep 30

**\$3656.20 Pay C&P Telephone**

Page  
 2-10  
 11-44  
 45-46

**PAID**

Handwritten notes in a circle:  
 \$1770.66  
 1439.21  
 331.45

\*1,770

Page 1

220263800803680000 101210046100001885540000365620 01 7

92040922493



**FREE THE EAGLE, INC.**  
 11244 WAPLES MILL ROAD, SUITE 100  
 FAIRFAX, VA 22030

THE GEORGE MASON BANK  
 FAIRFAX, VIRGINIA 22030  
 88-444/580

CHECK NUMBER **6061**

**PAID**  
 THE GEORGE MASON BANK  
**SEP 20 1988**  
 FAIRFAX, VIRGINIA

**PAY** THE SUM 1885 Dollars and 54 Cents DATE 09-15-88

\*\*\*\*\*1,885.54

**TO THE ORDER OF** C&P TELEPHONE COMPANY  
 P.O. BOX 27709  
 RICHMOND, VA 23261--770

60542232 09-20-88 004 00 0530

*Marilyn Price*

⑆0000606⑆⑆+⑆056004445⑆ 002634 4⑆ ⑆0000188554⑆

92040922494

25850892

0520-0027-8  
 0520-0027-8  
 60542232 09-20-88

2 091988 048 2202380080368 018854 1572

NO LOCKBOX CREDIT  
 TO WITHDRAWAL PAGE  
 ⑆0520-0027-8⑆  
 FIDELITY UNION BANK

19



**C&P Telephone**

A Bell Atlantic Company

Acct 202 638 0080 368 24

Aug 11 1988

**Summary**

Amount Past Due  
 \$1426.80 Last bill  
 -589.94 Payments  
 836.86 Balance overdue from last bill—please pay promptly

Current charges  
 517.38 C&P Telephone  
 1368.16 AT&T  
 \$1885.54 Subtotal Pay C&P by Aug 30

Page  
 3-11  
 12-33

**\$2722.20 Pay C&P Telephone**

1817.54  
 81.01

5400  
 67.95  
 C&P

**PAID**

220263800803680000 071207016100000836660000272220 01 6

92040922495



DIAL 1 WATS SERVICE

CUSTOMER: 111477293  
INVOICE # 06 09 046602  
SEP 17, 1988 376383

PRIOR BALANCE ? IF PREVIOUSLY PAID, PLEASE DISREGARD.	\$1247.08
CALL ACTIVITY THRU 09/13/88 328 CALLS	947.4 MINS
WATS USAGE	172.40
INTERNATIONAL	3.36
DIRECTORY ASSISTANCE USAGE	48.00
DIRECTORY ASSISTANCE CREDIT	1.20CR
NET USAGE TOTAL	222.56
FEDERAL EXCISE TAX (3% USAGE)	6.68
TELEMANAGEMENT FEATURE CHARGES	.00
FEATURES FEDERAL TAXES	1.78
WATS EQUIPMENT	59.55
CURRENT INVOICE TOTAL	\$ 290.57
TOTAL AMOUNT DUE	1537.65

DUE AND PAYABLE TO US SPRINT, AT P.O. BOX 620099, DALLAS, TEXAS 75262-0099  
FOR CUSTOMER SERVICE, DIAL 1-800-877-4646.

Catch all the Olympic action September 15-October 4 with US Sprint's "Olympics Hotline"! By dialing, toll-free, 1-800-USS-1988, you can hear the latest information on all the events throughout the Summer Olympic Games!

Handwritten notes in a circle: 5400, 21.11, 19.5.88, 810.8

CHECK NUMBER 630



**FREE THE EAGLE, INC.**

11244 WAPLES MILL ROAD, SUITE 800  
FAIRFAX, VA 22030  
25 E Street, N.W., Suite 800  
Washington, D.C. 20001

THE GEORGE MASON BANK  
FAIRFAX, VIRGINIA 22030  
88-444/560

DATE 11147729330602971855

92040922497  
PAY

THE SUM 290 Dollars and 57 Cents

10-27-88

\*\*\*\*\*290.57

TO THE ORDER OF

U.S. SPRINT  
P.O. BOX 620099  
DALLAS, TX 75262--0099

*Sam J. McNally*

⑆00006305⑆ ⑆056004445⑆ 002634 4⑆

⑆0000029057⑆

1 8 8 8 8 1 8 8 8 1 8 8 8 2 2 9 1 8 1

0530  
0010E

20 20 U1

1117729330602971855 ⑆056004445⑆ 002634 4⑆  
NO 88 ON

COALITION FOR A WINNING TICKET

(202) 636-0080

25 E STREEY, N.W., 8TH FLOOR  
WASHINGTON, D.C. 20001

1020

PAY TO THE  
ORDER OF

*Free the Eagle*  
*for a husband*

*March 10 1989* <sup>154</sup>/<sub>540</sub> 10

\$ *10,000*  
00/100  
DOLLARS

**1st AMERICAN BANK**  
FIRST AMERICAN BANK, N.A., WASHINGTON, D.C. 20005

FOR

*1152*

*A. Segal*

⑆001020⑆ ⑆054000043⑆

3 456 463⑆

⑆0001000000⑆

**FIRST AMERICAN BANK**

FIRST AMERICAN BANK, N. A.  
740 15TH STREET, N. W.  
WASHINGTON D.C. 20005

ENCLOSURES  
21  
PAGE NUMBER  
1

COALITION FOR A WINNING TICKET  
T/A FREE THE EAGLE  
25 E ST NW  
WASHINGTON DC 20011

TAXPAYER ID  
00-0000000

STATEMENT DATE  
08/31/88

ACCOUNT NUMBER  
3-456-463

STATEMENT (202) 637-7565  
STATEMENT INQUIRIES TO:  
MONEY EXCHANGE & ELECTRONIC TRANSFER (202) 637-7565  
CREDIT (202) 637-7565

FIRST AMERICAN BANK INTRODUCES BANKXPRESS . . . OUR PREMIER CASH MANAGEMENT SYSTEM FOR MID-SIZE TO LARGE CORPORATIONS.  
BANKXPRESS PROVIDES AN ELECTRONIC WINDOW BETWEEN YOUR OFFICE AND FIRST AMERICAN BANK. BANKXPRESS WILL ENABLE YOU TO ACCESS ACCOUNT BALANCES, ACCOUNT TRANSACTION HISTORY, INITIATE FUNDS TRANSFERS AND ISSUE STOP PAYMENTS, THROUGH THE USE OF A PC AND A MODEM. BANKXPRESS, ELECTRONIC BANKING FROM FIRST AMERICAN BANK. FOR MORE INFORMATION, CONTACT YOUR ACCOUNT OFFICER.

----- CHECKING ACCOUNT SUMMARY -----  
ACCOUNT NO. 3-456-463 COMMERCIAL CHECKING

BEGINNING BALANCE 07/31/88..... .00  
16 DEPOSITS/CREDITS..... 33,790.00\*  
22 CHECKS/DEBITS..... 16,820.18-  
SERVICE CHARGES..... .00-  
ENDING BALANCE 08/31/88..... 17,569.82

----- DAILY BALANCE SUMMARY -----

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
08/01	275.00-	08/12	13,435.57	08/23	17,106.92
08/02	295.00-	08/15	7,944.22	08/26	17,356.92
08/04	1,320.00	08/16	8,035.08	08/29	17,072.04
08/08	1,446.00	08/19	18,085.08	08/30	18,089.82
08/09	9,715.14	08/22	16,906.92	08/31	17,569.82
08/10	16,725.16				

CHECKING STATEMENT CONTINUES ON NEXT PAGE

92040922499

Legend CK Checking M Mortgage Loan MONEX Money Exchange  
SV Savings CD Certificate of Deposit CL Commercial Loan  
CC Credit Card IL Installment Loan





FIRST AMERICAN BANK, N. A.  
740 15TH STREET, N. W.  
WASHINGTON D.C. 20025

ENCLOSURES  
21  
PAGE NUMBER  
2

COALITION FOR A WINNING TICKET  
T/A FREE THE EAGLE  
25 E ST NW  
WASHINGTON DC 20011

TAXPAYER ID  
00-000000

STATEMENT DATE  
08/31/88

ACCOUNT NUMBER  
3-456-463

MISCELLANEOUS DEBITS AND CREDITS

DATE	AMOUNT	DESCRIPTION	REFERENCE
08/01	1,000.00+	DEPOSIT	31318058
08/02	29.00-	TRAVEL CHECK CHARGE	3100160
08/04	1,615.00+	DEPOSIT	30603897
08/08	800.00+	DEPOSIT	30421803
08/09	10,025.00+	DEPOSIT	30818487
08/09	400.00+	DEPOSIT	30935461
08/09	80.00+	DEPOSIT	30704053
08/10	5,010.00+	DEPOSIT	30508011
08/12	465.00+	DEPOSIT	30517335
08/15	2,500.00+	DEPOSIT	30800340
08/16	135.00+	DEPOSIT	30622804
08/19	10,000.00+	DEPOSIT	30528886
08/23	200.00+	DEPOSIT	30803042
08/26	250.00+	DEPOSIT	30539455
08/30	1,050.00+	DEPOSIT	30716604
08/30	10.00+	DEPOSIT	30716601
08/31	250.00+	DEPOSIT	30706791

CHECKS PRESENTED

DATE	CHECK NO.	AMOUNT	REFERENCE NO.	DATE	CHECK NO.	AMOUNT
08/01		1,275.00	31318109-30205445	08/15		450.00
08/08		476.00	30808220-30306446	08/15		118.80
08/09		1,725.00	30818473-30400692	08/16		44.14
08/09		870.00	30508580-30335825	08/22		150.00
08/09		350.86	30508580-30335817	08/22		500.00
08/12		1,125.00	70311969-30324937	08/22		378.16
08/12		425.00	30238261-30221192	08/22		100.00
08/12		125.00	30238260-30809161	08/29	10048	284.88
08/12		75.57	30320653-30332680	08/31	1005	770.00
08/15		5,595.18	30319924-30308580	08/30	1006	42.22
08/15		1,517.57	30310925			

\* INDICATES A SKIP IN SEQUENTIAL CHECK NUMBERS

Legend CK Checking M. Mortgage Loan MONEX Money Exchange  
SV Savings CD Certificate of Deposit CL Commercial Loan  
CC Credit Card IL Installment Loan



PLEASE EXAMINE AND REPORT DIFFERENCES IMMEDIATELY  
Notice: See Reverse Side for Important Information

92040922500



FIRST AMERICAN BANK, N. A.  
740 15TH STREET, N. W.  
WASHINGTON D.C. 20005

ENCLOSURES  
9  
PAGE NUMBER  
1

COALITION FOR A WINNING TICKET  
T/A FREE THE EAGLE  
25 E ST NW  
WASHINGTON DC 20011

TAXPAYER ID  
90-0000000

STATEMENT DATE  
09/30/88

ACCOUNT NUMBER  
3-456-463

STATEMENT DIRECT INQUIRIES TO: CREDIT  
(202) 637-7565 MONEY EXCHANGE & ELECTRONIC TRANSFER (202) 637-7565 (202) 637-7565

PLEASE TAKE A MINUTE TO READ THE ENCLOSED INFORMATION REGARDING  
YOUR ABILITY TO WITHDRAW FUNDS FROM YOUR BUSINESS ACCOUNT.

----- CHECKING ACCOUNT SUMMARY -----  
ACCOUNT NO. 3-456-463 COMMERCIAL CHECKING

BEGINNING BALANCE 08/31/88.....	17,569.82
3 DEPOSITS/CREDITS.....	650.00+
10 CHECKS/DEBITS.....	10,820.14-
SERVICE CHARGES.....	00-
ENDING BALANCE 09/30/88.....	7,399.68

----- DAILY BALANCE SUMMARY -----

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
09/01	13,985.34	09/07	8,978.68	09/20	7,528.68
09/02	13,559.90	09/12	7,478.68	09/27	7,399.68
09/06	12,964.43				

----- MISCELLANEOUS DEBITS AND CREDITS -----

DATE	AMOUNT	DESCRIPTION	REFERENCE
09/01	100.00+	DEPOSIT	30804313
09/07	500.00+	DEPOSIT	30416562
09/07	23.75-	PRINTED CHECKS CHARGE	2800058
09/20	50.00+	DEPOSIT	30730140

----- CHECKS PRESENTED -----

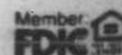
DATE	CHECK NO.	AMOUNT	REFERENCE NO.	DATE	CHECK NO.	AMOUNT
09/01	1001	3,684.48	30315701-30334880	09/02	1002	100.00

CHECKING STATEMENT CONTINUES ON NEXT PAGE

Legend CK - Checking ML - Mortgage Loan MONEX - Money Exchange  
SV - Savings CD - Certificate of Deposit CL - Commercial Loan  
CC - Credit Card IL - Installment Loan



PLEASE EXAMINE AND REPORT DIFFERENCES IMMEDIATELY



92040922501

# 1st AMERICAN BANK

FIRST AMERICAN BANK, N. A.  
740 15TH STREET, N. W.  
WASHINGTON D.C. 20005

ENCLOSURES 9  
PAGE NUMBER 2

COALITION FOR A WINNING TICKET  
T/A FREE THE EAGLE  
25 E ST NW  
WASHINGTON DC 20011

TAXPAYER ID  
00-0000000

STATEMENT DATE  
09/30/88

ACCOUNT NUMBER  
3-456-463

			CHECKS PRESENTED			
DATE	CHECK NO.	AMOUNT	REFERENCE NO.	DATE	CHECK NO.	AMOUNT
09/02	1003	325.44	30330125-30229401	09/12	1010	1,500.00
09/27	1007 <del>8</del>	129.00	30418958-30330217	09/06	1011	425.00
09/07	1008	4,462.00	30303162-30330216	09/06	1012	20.50
09/06	1009	149.97	30218058			

\* INDICATES A SKIP IN SEQUENTIAL CHECK NUMBERS

92040922502

Legend CK - Checking ML - Mortgage Loan MONEX - Money Exchange  
SV - Savings CD - Certificate of Deposit CL - Commercial Loan  
CC - Credit Card IL - Installment Loan



PLEASE EXAMINE AND REPORT DIFFERENCES IMMEDIATELY  
Notice: See Reverse Side for Important Information



**1ST AMERICAN**  
FIRST AMERICAN BANK

FIRST AMERICAN BANK, N. A.  
740 15TH STREET, N. W.  
WASHINGTON D.C. 20005

ENCLOSURES

PAGE NUMBER

3

1

COALITION FOR A WINNING TICKET  
T/A FREE THE EAGLE  
25 E ST NW  
WASHINGTON DC 20011

TAXPAYER ID  
00-0000000

STATEMENT DATE  
10/31/88

ACCOUNT NUMBER  
3-456-463

STATEMENT	DIRECT INQUIRIES TO:	CREDIT
(202) 637-7565	MONEY EXCHANGE & ELECTRONIC TRANSFER (202) 637-7565	(202) 637-7565

EFFECTIVE DECEMBER 1, 1988, THE STOP PAYMENT FEE FOR  
FIRST AMERICAN BANK, N.A. IS INCREASING FROM \$15.00 TO \$20.00.

----- CHECKING ACCOUNT SUMMARY -----

ACCOUNT NO. 3-456-463 COMMERCIAL CHECKING

BEGINNING BALANCE 09/30/88.....	7,599.68
0 DEPOSITS/CREDITS.....	.00+
3 CHECKS/DEBITS.....	4,621.85-
SERVICE CHARGES.....	.00-
ENDING BALANCE 10/31/88.....	2,777.83

----- DAILY BALANCE SUMMARY -----

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
10/18	4,899.68	10/24	3,777.83	10/31	2,777.83

----- CHECKS PRESENTED -----

DATE	CHECK NO.	AMOUNT	REFERENCE NO.	DATE	CHECK NO.	AMOUNT
10/18	1014	2,500.00	30336027-30233924	10/31	1017	1,000.00
10/24	1016*	1,121.85	30420128			

\* INDICATES A SKIP IN SEQUENTIAL CHECK NUMBERS

92040922503

Legend CK - Checking ML - Mortgage Loan MONEX - Money Exchange  
SV - Savings CD - Certificate of Deposit CL - Commercial Loan  
CC - Credit Card IL - Installment Loan



PLEASE EXAMINE AND REPORT DIFFERENCES IMMEDIATELY  
Notice: See Reverse Side for Important Information



**FIRST AMERICAN BANK**

FIRST AMERICAN BANK, N. A.  
740 15TH STREET, N. W.  
WASHINGTON D.C.

ENCLOSURES  
1  
PAGE NUMBER  
1

COALITION FOR A WINNING TICKET  
T/A FREE THE EAGLE  
25 E ST NW  
WASHINGTON DC 20011

TAXPAYER ID  
00-000000

STATEMENT DATE  
11/30/88

ACCOUNT NUMBER  
3-456-463

DIRECT INQUIRIES TO:  
STATEMENT (202) 637-7565  
MONEY EXCHANGE & ELECTRONIC TRANSFER (202) 637-7565  
CREDIT (202) 637-7565

REMEMBER, FIRST AMERICAN BANK WILL BE CLOSED FOR THE HOLIDAYS ON MONDAY, DECEMBER 26, 1988 AND MONDAY, JANUARY 2, 1989. AS ALWAYS, IT IS A PLEASURE TO SERVE YOUR BANKING NEEDS.

----- CHECKING ACCOUNT SUMMARY -----  
ACCOUNT NO. 3-456-463 COMMERCIAL CHECKING

BEGINNING BALANCE 10/31/88.....	2,777.83
1 DEPOSITS/CREDITS.....	2,500.00+
1 CHECKS/DEBITS.....	2,500.00-
SERVICE CHARGES.....	.00-
ENDING BALANCE 11/30/88.....	3,777.83

----- DAILY BALANCE SUMMARY -----

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
11/09	5,277.83	11/15	3,777.83		

----- MISCELLANEOUS DEBITS AND CREDITS -----

DATE	AMOUNT	DESCRIPTION	REFERENCE
11/09	2,500.00+	DEPOSIT	30719994

----- CHECKS PRESENTED -----

DATE	CHECK NO.	AMOUNT	REFERENCE NO.	DATE	CHECK NO.	AMOUNT
11/15	1018	1,500.00	30226358			

\* INDICATES A SKIP IN SEQUENTIAL CHECK NUMBERS

92040922504

Legend CK - Checking ML - Mortgage Loan MONEX - Money Exchange  
SV - Savings CD - Certificate of Deposit CL - Commercial Loan  
CC - Credit Card IL - Installment Loan



PLEASE EXAMINE AND REPORT DIFFERENCES IMMEDIATELY  
Notice: See Reverse Side for Important Information





FIRST AMERICAN BANK, N. A.  
 740 15TH STREET, N. W.  
 WASHINGTON D.C. 20005-1097

ENCLOSURES  
 0  
 PAGE NUMBER  
 1

COALITION FOR A WINNING TICKET  
 T/A FREE THE EAGLE  
 25 E ST NW  
 WASHINGTON DC 20011

TAXPAYER ID  
 00-0600000

STATEMENT DATE  
 12/30/88

ACCOUNT NUMBER  
 3-456-463

STATEMENT	DIRECT INQUIRIES TO:	CREDIT
(202) 637-7565	MONEY EXCHANGE & ELECTRONIC TRANSFER (202) 637-7565	(202) 637-7565

EFFECTIVE JANUARY 1, 1989, THE INSUFFICIENT FUNDS CHARGE FOR FIRST AMERICAN BANK, N.A. IS INCREASING FROM \$20.00 TO \$22.00. AS ALWAYS, IT IS A PLEASURE TO SERVE YOUR BANKING NEEDS. FIRST AMERICAN BANK WISHES YOU A PROSPEROUS NEW YEAR.

----- CHECKING ACCOUNT SUMMARY -----

ACCOUNT NO. 3-456-463 COMMERCIAL CHECKING

BEGINNING BALANCE 11/30/88.....	3,777.83
D DEPOSITS/CREDITS.....	.00+
D CHECKS/DEBITS.....	.00-
SERVICE CHARGES.....	.00-
ENDING BALANCE 12/30/88.....	3,777.83

92040922505

Legend CK Checking ML Mortgage Loan MONEX - Money Exchange  
 SV Savings CD Certificate of Deposit CL Commercial Loan  
 CC Credit Card IL Installment Loan



PLEASE EXAMINE AND REPORT DIFFERENCES IMMEDIATELY



FIRST AMERICAN BANK, N. A.  
 740 15TH STREET, N. W.  
 WASHINGTON D.C. 20005-1097

ENCLOSURES

PAGE NUMBER

1

COALITION FOR A WINNING TICKET  
 T/A FREE THE EAGLE  
 25 E ST NW  
 WASHINGTON DC 20011

TAXPAYER ID  
 00-0000000

STATEMENT DATE  
 01/31/89

ACCOUNT NUMBER  
 3-456-463

	DIRECT INQUIRIES TO:	
STATEMENT (202) 637-7565	MONEY EXCHANGE & ELECTRONIC TRANSFER (202) 637-7565	CREDIT (202) 637-7565

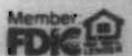
BANKXPRESS, FIRST AMERICAN BANK'S PREMIER CASH MANAGEMENT SYSTEM FOR MID-SIZE TO LARGE CORPORATIONS, PROVIDES AN ELECTRONIC WINDOW BETWEEN YOUR OFFICE AND FIRST AMERICAN BANK. BANKXPRESS WILL ENABLE YOU TO ACCESS ACCOUNT BALANCES, ACCOUNT TRANSACTION HISTORY, INITIATE FUNDS TRANSFERS AND ISSUE STOP PAYMENTS, THROUGH THE USE OF A PC AND A MODEM. BANKXPRESS, ELECTRONIC BANKING FROM FIRST AMERICAN BANK. FOR MORE INFORMATION, CONTACT YOUR ACCOUNT OFFICER.

----- CHECKING ACCOUNT SUMMARY -----

ACCOUNT NO.	3-456-463	COMMERCIAL CHECKING
BEGINNING BALANCE 12/30/88.....		3,777.83
0 DEPOSITS/CREDITS.....		.00+
0 CHECKS/DEBITS.....		.00-
SERVICE CHARGES.....		.00-
ENDING BALANCE 01/31/89.....		3,777.83

92040922506

Legend CK - Checking      ML - Mortgage Loan      MONEX - Money Exchange  
 SV - Savings              CD - Certificate of Deposit      CL - Commercial Loan  
 CC - Credit Card          IL - Installment Loan



PLEASE EXAMINE AND REPORT DIFFERENCES IMMEDIATELY  
 Notice: See Reverse Side for Important Information

**FIRST AMERICAN**  
FIRST AMERICAN BANK

FIRST AMERICAN BANK, N. A.  
740 15TH STREET, N. W.  
WASHINGTON D.C. 20005-1097

ENCLOSURES  
0  
PAGE NUMBER  
1

COALITION FOR A WINNING TICKET  
T/A FREE THE EAGLE  
25 E ST NW  
WASHINGTON DC 20011

TAXPAYER ID  
06-0000000

STATEMENT DATE  
02/28/89

ACCOUNT NUMBER  
3-456-463

DIRECT INQUIRIES TO:  
STATEMENT (202) 637-7565  
MONEY EXCHANGE & ELECTRONIC TRANSFER (202) 637-7565  
CREDIT (202) 637-7565

BANKXPRESS, FIRST AMERICAN BANK'S PREMIER CASH MANAGEMENT SYSTEM FOR MID-SIZE TO LARGE CORPORATIONS, PROVIDES AN ELECTRONIC WINDOW BETWEEN YOUR OFFICE AND FIRST AMERICAN BANK. BANKXPRESS WILL ENABLE YOU TO ACCESS ACCOUNT BALANCES, ACCOUNT TRANSACTION HISTORY, INITIATE FUNDS TRANSFERS AND ISSUE STOP PAYMENTS, THROUGH THE USE OF A PC AND A MODEM. BANKXPRESS, ELECTRONIC BANKING FROM FIRST AMERICAN BANK. FOR MORE INFORMATION, CONTACT YOUR ACCOUNT OFFICER.

----- CHECKING ACCOUNT SUMMARY -----

ACCOUNT NO.	3-456-463	COMMERCIAL CHECKING
BEGINNING BALANCE 01/31/89.....		3,777.83
0 DEPOSITS/CREDITS.....		.00+
0 CHECKS/DEBITS.....		.00-
SERVICE CHARGES.....		.00-
ENDING BALANCE 02/28/89.....		3,777.83

Legend CK Checking ML Mortgage Loan MONEX Money Exchange  
SV Savings CD Certificate of Deposit CL Commercial Loan  
CC Credit Card IL Installment Loan



PLEASE EXAMINE AND REPORT DIFFERENCES IMMEDIATELY  
Notice: See Reverse Side for Important Information

92040922507

**AMERICAN**  
FIRST AMERICAN BANK

FIRST AMERICAN BANK, N. A.  
740 15TH STREET, N. W.  
WASHINGTON D.C. 20005-1097

ENCLOSURES  
1  
PAGE NUMBER  
1

COALITION FOR A WINNING TICKET  
T/A FREE THE EAGLE  
25 E ST NW  
WASHINGTON DC 20011

TAXPAYER ID  
00-0000000

STATEMENT DATE  
03/31/89

ACCOUNT NUMBER  
3-456-463

DIRECT INQUIRIES TO:  
MONEY EXCHANGE (202) 637-7565  
CUSTOMER SERVICE (202) 637-7565  
CREDIT (202) 637-7565

BANKXPRESS, FIRST AMERICAN BANK'S PREMIER CASH MANAGEMENT SYSTEM FOR MID-SIZE TO LARGE CORPORATIONS, PROVIDES AN ELECTRONIC WINDOW BETWEEN YOUR OFFICE AND FIRST AMERICAN BANK. BANKXPRESS WILL ENABLE YOU TO ACCESS ACCOUNT BALANCES, ACCOUNT TRANSACTION HISTORY, INITIATE FUNDS TRANSFERS AND ISSUE STOP PAYMENTS, THROUGH THE USE OF A PC AND A MODEM. BANKXPRESS, ELECTRONIC BANKING FROM FIRST AMERICAN BANK. FOR MORE INFORMATION, CONTACT YOUR ACCOUNT OFFICER.

----- CHECKING ACCOUNT SUMMARY -----

ACCOUNT NO. 3-456-463 COMMERCIAL CHECKING

BEGINNING BALANCE 02/28/89.....	3,777.83
1 DEPOSITS/CREDITS.....	10,000.00+
1 CHECKS/DEBITS.....	10,000.00-
SERVICE CHARGES.....	.00-
ENDING BALANCE 03/31/89.....	3,777.83

----- DAILY BALANCE SUMMARY -----

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
03/13	13,777.83	03/14	3,777.83		

----- MISCELLANEOUS DEBITS AND CREDITS -----

DATE	AMOUNT	DESCRIPTION	REFERENCE
03/13	10,000.00+	DEPOSIT	30811672

----- CHECKS PRESENTED -----

DATE	CHECK NO.	AMOUNT	REFERENCE NO.	DATE	CHECK NO.	AMOUNT
03/14	1020	10,000.00	30328301			

\* INDICATES A SKIP IN SEQUENTIAL CHECK NUMBERS

Legend CK - Checking IML - Mortgage Loan MONEX - Money Exchange  
SV - Savings CD - Certificate of Deposit CL - Commercial Loan  
CC - Credit Card IL - Installment Loan



PLEASE EXAMINE AND REPORT DIFFERENCES IMMEDIATELY  
Notice: See Reverse Side for Important Information



92040922508

**1ST AMERICAN**  
FIRST AMERICAN BANK

FIRST AMERICAN BANK, N. A.  
740 15TH STREET, N. W.  
WASHINGTON D.C. 20005-1097

ENCLOSURES  
1  
PAGE NUMBER  
1

COALITION FOR A WINNING TICKET  
T/A FREE THE EAGLE  
25 E ST NW  
WASHINGTON DC 20011

TAXPAYER ID  
00-0000000

STATEMENT DATE  
05/31/89

ACCOUNT NUMBER  
3-456-463

MONEY EXCHANGE (202) 637-7565  
DIRECT INQUIRIES TO: CUSTOMER SERVICE (202) 637-7565  
CREDIT (202) 637-7565

BANKXPRESS, FIRST AMERICAN BANK'S PREMIER CASH MANAGEMENT SYSTEM FOR MID-SIZE TO LARGE CORPORATIONS, PROVIDES AN ELECTRONIC WINDOW BETWEEN YOUR OFFICE AND FIRST AMERICAN BANK. BANKXPRESS WILL ENABLE YOU TO ACCESS ACCOUNT BALANCES, ACCOUNT TRANSACTION HISTORY, INITIATE FUNDS TRANSFERS AND ISSUE STOP PAYMENTS, THROUGH THE USE OF A PC AND A MODEM. BANKXPRESS, ELECTRONIC BANKING FROM FIRST AMERICAN BANK. FOR MORE INFORMATION, CONTACT YOUR ACCOUNT OFFICER.

----- CHECKING ACCOUNT SUMMARY -----  
ACCOUNT NO. 3-456-463 COMMERCIAL CHECKING

BEGINNING BALANCE 04/28/89.....	2,529.30
0 DEPOSITS/CREDITS.....	.00+
1 CHECKS/DEBITS.....	1,036.63-
SERVICE CHARGES.....	1.19-
ENDING BALANCE 05/31/89.....	1,491.48

----- DAILY BALANCE SUMMARY -----

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
05/01	1,492.67	05/31	1,491.48		

----- MISCELLANEOUS DEBITS AND CREDITS -----

DATE	AMOUNT	DESCRIPTION	REFERENCE
05/31	1.19-	SERVICE CHARGE	

----- CHECKS PRESENTED -----

DATE	CHECK NO.	AMOUNT	REFERENCE NO.	DATE	CHECK NO.	AMOUNT
05/01	1021	1,036.63	30311816			

\* INDICATES A SKIP IN SEQUENTIAL CHECK NUMBERS

92040922509

FIRST AMERICAN BANK, N. A.  
740 15TH STREET, N. W.  
WASHINGTON D.C. 20005-1097

ENCLOSURES

1

PAGE NUMBER

1

COALITION FOR A WINNING TICKET  
T/A FREE THE EAGLE  
25 E ST NW  
WASHINGTON DC 20011

TAXPAYER ID

00-0000000

STATEMENT DATE  
06/30/89

ACCOUNT NUMBER  
3-456-463

DIRECT INQUIRIES TO:

HONEY EXCHANGE  
(202) 637-7565

CUSTOMER SERVICE  
(202) 637-7565

CREDIT  
(202) 637-7565

BANKXPRESS, FIRST AMERICAN BANK'S PREMIER CASH MANAGEMENT SYSTEM FOR MID-SIZE TO LARGE CORPORATIONS, PROVIDES AN ELECTRONIC WINDOW BETWEEN YOUR OFFICE AND FIRST AMERICAN BANK. BANKXPRESS WILL ENABLE YOU TO ACCESS ACCOUNT BALANCES, ACCOUNT TRANSACTION HISTORY, INITIATE FUNDS TRANSFERS AND ISSUE STOP PAYMENTS, THROUGH THE USE OF A PC AND A MODEM. BANKXPRESS, ELECTRONIC BANKING FROM FIRST AMERICAN BANK. FOR MORE INFORMATION, CONTACT YOUR ACCOUNT OFFICER.

----- CHECKING ACCOUNT SUMMARY -----

ACCOUNT NO. 3-456-463 COMMERCIAL CHECKING

BEGINNING BALANCE 05/31/89.....	1,491.48
0 DEPOSITS/CREDITS.....	.00+
1 CHECKS/DEBITS.....	636.80-
SERVICE CHARGES.....	3.87-
ENDING BALANCE 06/30/89.....	850.81

----- DAILY BALANCE SUMMARY -----

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
06/05	854.68	06/30	850.81		

----- MISCELLANEOUS DEBITS AND CREDITS -----

DATE	AMOUNT	DESCRIPTION	REFERENCE
06/30	3.87-	SERVICE CHARGE	

----- CHECKS PRESENTED -----

DATE	CHECK NO.	AMOUNT	REFERENCE NO.	DATE	CHECK NO.	AMOUNT
06/05	1025	636.80	30614124			

\* INDICATES A SKIP IN SEQUENTIAL CHECK NUMBERS

Legend CK Checking ML Mortgage Loan MONEX Money Exchange  
SV Savings CD Certificate of Deposit CL Commercial Loan  
CC Credit Card IL Installment Loan



PLEASE EXAMINE AND REPORT DIFFERENCES IMMEDIATELY  
Notice: See Reverse Side for Important Information

92040922510



COALITION FOR A WINNING TICKET

1004

(202) 638-0080  
25 E STREET, N.W., 8TH FLOOR  
WASHINGTON, D.C. 20001

August 26 1988 <sup>154</sup>/<sub>540</sub> 10

PAY TO THE ORDER OF

TOM COX

\$ 284.88

TWO HUNDRED AND EIGHTY-FOUR

<sup>488</sup>/<sub>1000</sub> DOLLARS

FIRST AMERICAN BANK  
FIRST AMERICAN BANK, N.A. WASHINGTON, D.C. 20005

FOR

PERSONAL EXPENSES RE: CONVENTION

⑆001004⑆ ⑆054000043⑆

3 456 463⑆

H. Szymanski

⑆0000028488⑆

COALITION FOR A WINNING TICKET

1006

(202) 638-0080  
25 E STREET, N.W., 8TH FLOOR  
WASHINGTON, D.C. 20001

August 26 1988 <sup>154</sup>/<sub>540</sub> 10

PAY TO THE ORDER OF

PAUL ANDREW MARLEAU

\$ 42.22

Forty-Two

<sup>222</sup>/<sub>1000</sub> DOLLARS

FIRST AMERICAN BANK  
FIRST AMERICAN BANK, N.A. WASHINGTON, D.C. 20005

FOR

Expenses for CWT

⑆001006⑆ ⑆054000043⑆

3 456 463⑆

H. Szymanski

⑆0000004222⑆

COALITION FOR A WINNING TICKET

1005

(202) 638-0080  
25 E STREET, N.W., 8TH FLOOR  
WASHINGTON, D.C. 20001

August 26 1988 <sup>154</sup>/<sub>540</sub> 10

PAY TO THE ORDER OF

DAN FERRIN

\$ 770

SEVEN HUNDRED AND SEVENTY

<sup>00</sup>/<sub>1000</sub> DOLLARS

FIRST AMERICAN BANK  
FIRST AMERICAN BANK, N.A. WASHINGTON, D.C. 20005

CONSULTING

FOR

EXPENSES FOR CWT

⑆001005⑆ ⑆054000043⑆

3 456 463⑆

H. Szymanski

⑆0000077000⑆

COALITION FOR A WINNING TICKET

(202) 638-0080

25 E STREET, N.W., 8TH FLOOR  
WASHINGTON, D.C. 20001

1007

August 26 1988 <sup>154</sup>/<sub>540</sub> 10

PAY TO THE ORDER OF

LINCOLN PROPERTY

ONE HUNDRED AND TWENTY-NINE — DOLLARS

FIRST AMERICAN BANK  
FIRST AMERICAN BANK, N.A., WASHINGTON, D.C. 20005

FOR OFFICE SPACE - NEW ORLEANS

H. Segal

⑆001007⑆ ⑆054000043⑆ 3 456 463⑆ ⑆0000012900⑆

COALITION FOR A WINNING TICKET

(202) 638-0080

25 E STREET, N.W., 8TH FLOOR  
WASHINGTON, D.C. 20001

1008

August 31 1988 <sup>154</sup>/<sub>540</sub> 10

PAY TO THE ORDER OF

FREE THE EAGLE \$ 4,462

FOUR THOUSAND FOUR HUNDRED AND SIXTY-TWO — DOLLARS

FIRST AMERICAN BANK  
FIRST AMERICAN BANK, N.A., WASHINGTON, D.C. 20005

FOR OFFICIAL TEL. ETC.

H. Segal

⑆001008⑆ ⑆054000043⑆ 3 456 463⑆ ⑆0000446200⑆

COALITION FOR A WINNING TICKET

(202) 638-0080

25 E STREET, N.W., 8TH FLOOR  
WASHINGTON, D.C. 20001

1009

August 31 1988 <sup>154</sup>/<sub>540</sub> 10

PAY TO THE ORDER OF

JOHN SMITH \$ 149.97

One Hundred and Forty-Nine — DOLLARS

FIRST AMERICAN BANK  
FIRST AMERICAN BANK, N.A., WASHINGTON, D.C. 20005

FOR Expenses - New Orleans

H. Segal

⑆001009⑆ ⑆054000043⑆ 3 456 463⑆ ⑆0000014997⑆

COALITION FOR A WINNING TICKET

(202) 638-0080  
25 E STREET, N.W., 8TH FLOOR  
WASHINGTON, D.C. 20061

1010

September 19 88 <sup>154</sup>/<sub>540</sub> 10

PAY TO THE ORDER OF

50502202 09-12-88 004 18 0500  
*Great in Commission, Inc.* \$ 4,500  
*Four thousand and five hundred* <sup>00/100</sup> DOLLARS

**FIRST AMERICAN BANK**  
FIRST AMERICAN BANK, N.A., WASHINGTON, D.C. 20005

FOR

*Consulting - New Orleans*

*H. Segal*

⑆001010⑆ ⑆054000043⑆ 3 456 463⑆ ⑆0000150000⑆

COALITION FOR A WINNING TICKET

(202) 638-0080  
25 E STREET, N.W., 8TH FLOOR  
WASHINGTON, D.C. 20001

1011

September 19 88 <sup>154</sup>/<sub>540</sub> 10

PAY TO THE ORDER OF

1522021 09-12-88 004 18 0500  
*Dan Pessin* \$ 425.00  
*Four hundred and twenty-five* <sup>00/100</sup> DOLLARS

**FIRST AMERICAN BANK**  
FIRST AMERICAN BANK, N.A., WASHINGTON, D.C. 20005

FOR

*Consulting*

*H. Segal*

⑆001010⑆ ⑆054000043⑆ 3 456 463⑆ ⑆0000042500⑆

COALITION FOR A WINNING TICKET

(202) 638-0080  
25 E STREET, N.W., 8TH FLOOR  
WASHINGTON, D.C. 20001

1012

September 19 88 <sup>154</sup>/<sub>540</sub> 10

PAY TO THE ORDER OF

1522021 09-12-88 004 18 0500  
*Dan Pessin* \$ 20.50  
*twenty and* <sup>50/100</sup> DOLLARS

**FIRST AMERICAN BANK**  
FIRST AMERICAN BANK, N.A., WASHINGTON, D.C. 20005

FOR

*Expenses*

*H. Segal*

⑆001010⑆ ⑆054000043⑆ 3 456 463⑆ ⑆0000020500⑆

WINNING TICKET

1014

080  
8TH FLOOR  
WASHINGTON, D.C. 20001

*October 14 1988* <sup>154</sup>/<sub>540</sub> 10

*Borden Group* \$ 2,580.00  
*Two thousand and Five Hundred* <sup>00/100</sup>  
DOLLARS

AMERICAN BANK  
WASHINGTON, D.C. 20005

*H. S. Saylor*

⑆054000043⑆ 3 456 463⑆ ⑆0000250000⑆

FOR A WINNING TICKET

1016

(202) 638-0080  
ST. N.W., 8TH FLOOR  
WASHINGTON, D.C. 20001

*October 18 1988* <sup>154</sup>/<sub>540</sub> 10

*H. S. Saylor* \$ 1,218.50  
*One thousand and Twenty One* <sup>50/100</sup>  
DOLLARS

AMERICAN BANK  
WASHINGTON, D.C. 20005

*H. S. Saylor*

⑆054000043⑆ 3 456 183⑆ ⑆0000121850⑆

FOR A WINNING TICKET

1017

(202) 638-0080  
ST. N.W., 8TH FLOOR  
WASHINGTON, D.C. 20001

*October 27 1988* <sup>154</sup>/<sub>540</sub> 10

*The Borden Group* \$ 1,080.00  
*One thousand* <sup>00/100</sup>  
DOLLARS

AMERICAN BANK  
WASHINGTON, D.C. 20005

*H. S. Saylor*

⑆054000043⑆ 3 456 463⑆ ⑆0000100000⑆

COALITION FOR A WINNING TICKET

(202) 638-0080

25 E STREET, N.W., 8TH FLOOR  
WASHINGTON, D.C. 20001

1018

*November 9 1994*

154  
540 10

PAY TO THE  
ORDER OF

*Libe Gader Group*

\$ 1,500

*One thousand and Five Hundred* DOLLARS

**FIRST AMERICAN BANK**  
FIRST AMERICAN BANK, N.A., WASHINGTON, D.C. 20005

FOR

*Coalition*

*A. Lopez*

⑆00 1018⑆ ⑆054000043⑆

3 456 463⑆

⑆0000150000⑆

92040

COALITION FOR A WINNING TICKET

(202) 638-0080

25 E STREET, N.W., 8TH FLOOR  
WASHINGTON, D.C. 20001

1020

PAY TO THE  
ORDER OF

*Free the Eagle*  
*for a reward*

*March 18 1987*  
*10,000*  
DOLLARS

**1st AMERICAN BANK**  
FIRST AMERICAN BANK, N.A., WASHINGTON, D.C. 20005

FOR

*1152*

*A. Segal*

⑆001020⑆ ⑆054000043⑆

3 456 463⑆

⑆0001000000⑆

COALITION FOR A WINNING TICKET

(202) 638-0080

25 E STREET, N.W., 8TH FLOOR  
WASHINGTON, D.C. 20001

1021

0000027554

154  
540 10

PAY TO THE  
ORDER OF

*Senator Charles W. Stenholm*  
*March 28 1989*  
*One thousand and thirty six*  
*463/100*  
dollars

**1st AMERICAN BANK**  
FIRST AMERICAN BANK, N.A., WASHINGTON, D.C. 20001

*H. Segal*

FOR

⑆001021⑆ ⑆054000043⑆

3 456 463⑆

⑆0000103663⑆

0  
1  
2  
3  
4  
5  
6  
7  
8  
9

9  
2  
0

COALITION FOR A WINNING TICKET

(202) 638-0080

25 E STREET, N.W., 8TH FLOOR  
WASHINGTON, D.C. 20001

1022

March 29 1989 <sup>154</sup>/<sub>540</sub> - 10

PAY TO THE ORDER OF

*Free The Eagle*

\$ 1,120.13

*One Thousand One Hundred and Twenty - <sup>13</sup>/<sub>100</sub> DOLLARS*

**FIRST AMERICAN BANK**  
FIRST AMERICAN BANK, N.A., WASHINGTON, D.C. 20005

*A. Segal*

FOR

⑆001022⑆ ⑆054000043⑆

3 456 463⑆

⑆0000112013⑆

COALITION FOR A WINNING TICKET

(202) 638-0080

25 E STREET, N.W., 8TH FLOOR  
WASHINGTON, D.C. 20001

1023

March 29 1989 <sup>154</sup>/<sub>540</sub> - 10

PAY TO THE ORDER OF

*Ventured Coffee Service*

\$ 128.90

*One Hundred and Twenty-Eight - <sup>90</sup>/<sub>100</sub> DOLLARS*

**FIRST AMERICAN BANK**  
FIRST AMERICAN BANK, N.A., WASHINGTON, D.C. 20005

*A. Segal*

FOR

⑆001023⑆ ⑆054000043⑆

3 456 463⑆

⑆0000012890⑆

92040922520

COALITION FOR A WINNING TICKET

(202) 638-0080  
25 E STREET, N.W., 8TH FLOOR  
WASHINGTON, D.C. 20001

1025

May 25 1989 <sup>154</sup>/<sub>540</sub> 10

PAY TO THE ORDER OF

*Alan P. Dye*  
*Six Hundred and Thirty-Six*

\$ 636.80  
DOLLARS

**1st AMERICAN BANK**  
FIRST AMERICAN BANK, N.A., WASHINGTON, D.C. 20005

FOR

*Re: FCC*

*A. Sargent*

⑆001025⑆ ⑆054000043⑆

⑆456463⑆

⑆0000063680⑆

*[Handwritten mark]*

PAY TO THE ORDER OF 1st American August 1 19 88 <sup>154</sup>/<sub>540</sub>

one thousand, two hundred and seventy-five DOLLARS

FOR Cashiers Check for CMU3 Fabulous *[Signature]*

⑆054000043⑆ 3 456 463⑆ ⑈0000127500⑈

PAY TO THE ORDER OF Dan Ferrin August 8 19 88 <sup>154</sup>/<sub>540</sub>

THREE HUNDRED AND THIRTY DOLLARS

FOR (3) EXPENSES *[Signature]*

⑆054000043⑆ 3 456 463⑆ ⑈0000093086⑈

PAY TO THE ORDER OF Dan Ferrin August 8 19 88 <sup>154</sup>/<sub>540</sub>

EIGHT HUNDRED AND FIFTY DOLLARS

FOR (4) Salary *[Signature]*

⑆054000043⑆ 3 456 463⑆ ⑈0000085000⑈

Coalition for A Winny Ticket  
 25 E Street, 5th Floor  
 Washington, D.C. 20002

PASCILLA, ISSICA  
 Sen Symms - 204-6142-0792  
 IDAHO H.C. # 519-02-0264

August 5 1988 <sup>15-4</sup>/<sub>540</sub>

PAY TO THE ORDER OF DELTA AIRLINES \$ 474.00  
 FOUR HUNDRED AND SEVENTY DOLLARS

#11

1ST AMERICAN 518 EAST 2ND ST. WASHINGTON, DC  
 SEROME, ID

FOR H. Segent

⑆054000043⑆ 3 456 463⑆ ⑆0000067400⑆

Carstore

Aug 8 1988 <sup>15-4</sup>/<sub>540</sub>

PAY TO THE ORDER OF Carstore \$ 425.00  
 FOUR HUNDRED AND TWENTY FIVE DOLLARS

1ST AMERICAN 518 EAST 2ND ST. WASHINGTON, DC

FOR Back to rest

H. Segent

⑆054000043⑆ 3 456 463⑆ ⑆0000042500⑆

First American

Aug 9 1988 <sup>15-4</sup>/<sub>540</sub>

PAY TO THE ORDER OF First American \$ 1250.00  
 TWELVE HUNDRED AND FIFTY DOLLARS

1ST AMERICAN 518 EAST 2ND ST. WASHINGTON, DC

FOR Cashiers Check

H. Segent

⑆054000043⑆ 3 456 463⑆ ⑆0000125500⑆



FREE TIME EAGLE, INC.  
 11244 WARREN HILL ROAD, SUITE J  
 FAIRFAX, VA 22030

THE GEORGE MASON BANK  
 FAIRFAX, VIRGINIA 22030  
 66-444/360

DATE

*Five Hundred Dollars*

*Aug 9/78* \$ 500.00

*[Handwritten signature]*

THE  
 DER  
 OF

*George Friedman*

NOT NEGOTIABLE

⑈00005889⑈ ⑈05600⑈ ⑈0824 ⑈

*Payment for Condo Rental*

500.00

*[Handwritten signature]*

9 2 0 4 0 9 2 2 5 2 3

PAY TO THE ORDER OF C.M.B. Finkbeiner Aug 9 1988 <sup>154</sup>/<sub>540</sub>  
Eighteen hundred and twenty-seven <sup>37</sup> DOLLARS  
**1st AMERICAN**  
 FIRST AMERICAN BANK, N.A. WASHINGTON, DC  
 FOR H. Segent  
 \*054000043\* 3 456 463 0000182737

PAY TO THE ORDER OF Capstone Aug 9<sup>th</sup> 1988 <sup>154</sup>/<sub>540</sub>  
one hundred and twenty-five <sup>00</sup> DOLLARS  
**1st AMERICAN**  
 FIRST AMERICAN BANK, N.A. WASHINGTON, DC  
 FOR Martin H. Segent  
 \*054000043\* 3 456 463 000012500

PAY TO THE ORDER OF Central Prints Inc Aug 10 1988 <sup>154</sup>/<sub>540</sub>  
Seventy Nine Dollars and fifty seven cents DOLLARS  
**1st AMERICAN**  
 FIRST AMERICAN BANK, N.A. WASHINGTON, DC  
 FOR Xerox paper  
 \*054000043\* 3 456 463 0000007957

August 9, 1988 <sup>154</sup>/<sub>540</sub>

08-15-88 004 18 0555 10955675

PAY TO THE ORDER OF Sight and Sound \$ 178.80

one hundred eighteen and eight/100 DOLLARS

**1st AMERICAN**  
FIRST AMERICAN BANK, N.A. WASHINGTON, DC

FOR [Signature]

#0540000431 3 456 4631 #000011880

FREE THE EAGLES  
25 E. NW  
Washington, DC 20001

Aug 10, 1988 <sup>154</sup>/<sub>540</sub>

08-22-88 004 18 0720 20234424

PAY TO THE ORDER OF Audubon Computers \$ 378.16

Three Hundred and Seventy Eight and 16/100 DOLLARS

**1st AMERICAN**  
FIRST AMERICAN BANK, N.A. WASHINGTON, DC

FOR #2701 #806 R. N. Computer Computer Rental

[Signature]

#0540000431 3 456 4631 #0000037816

Coalition for a Woman Ticket  
Section 501(c)(3) Non-Profit

Aug 15, 1988 <sup>154</sup>/<sub>540</sub>

08-22-88 004 18 0720 20234424

PAY TO THE ORDER OF General A.V. \$ 500.00

Five hundred and 00/100 DOLLARS

**1st AMERICAN**  
FIRST AMERICAN BANK, N.A. WASHINGTON, DC

FOR [Signature]

#0540000431 3 456 4631 #0000050000

COALITION FOR A WINNING TICKET  
CHAIRMAN: SENATOR GORDON HUMPHREY

AUGUST 11 1988 <sup>154</sup>/<sub>540</sub>

PAY TO THE ORDER OF

LEE LIVINGSTON FIFTY

DP \$ 450.00 DP

FOUR HUNDRED AND FIFTY DOLLARS

1ST AMERICAN  
FIRST AMERICAN BANK, NA, WASHINGTON, DC

FOR

⑆054000043⑆

3 456 463⑈

⑆0000045000⑆

PAY TO THE ORDER OF

DAN T. KEVIN

Aug 11<sup>th</sup> 1988 <sup>154</sup>/<sub>540</sub>

SEVEN HUNDRED AND TWENTY FIVE DOLLARS

1ST AMERICAN  
FIRST AMERICAN BANK, NA, WASHINGTON, DC

Perin Country  
425, G.M. 350  
BA-350 for ledger advance

⑆054000043⑆

3 456 463⑈

⑆000012500⑆

PAY TO THE ORDER OF

CHB INTERNATIONAL CORP.

AUGUST 11 1988 <sup>154</sup>/<sub>540</sub>

FIVE THOUSAND FIVE HUNDRED AND NINETY-FIVE DOLLARS

1ST AMERICAN  
FIRST AMERICAN BANK, NA, WASHINGTON, DC

FOR Priddy & Marky

⑆054000043⑆

3 456 463⑈

⑆0000559518⑆

01

PAY TO THE ORDER OF

*Peerless Party Rentals* *Aug 14* 19 *88* <sup>154</sup>/<sub>540</sub>

*Seventy-four*

\$ *44.14*

DOLLARS

**1st AMERICAN**  
FIRST AMERICAN BANK, N.A. WASHINGTON, DC

FOR

*Meeting (chairs)*

*[Signature]*

⑆054000043⑆

3 456 463⑆

⑆0000004414⑆

92040922527

**1st AMERICAN**  
FIRST AMERICAN BANK, N.A.

*351-34 4106-D.C.*

*HOWARD SEGERMARK*  
*704 MASS AVE NE*  
*WASH. DC*

WASHINGTON, D.C.

*August 17, 1988*

PAY TO THE ORDER OF

**Windsor Court Hotel**

\$ *100.00*

*One hundred and no/100*

DOLLARS

WRITE IN ACCOUNT NUMBER

*3 - 456 - 463*

*[Signature]*

⑆054000043⑆

⑆00000010000⑆

*COALITION FOR A WINNING TICKET*

**1st AMERICAN**  
FIRST AMERICAN BANK, N.A.

WASHINGTON, D.C.

*August 19 1988*

PAY TO THE ORDER OF

*CASH*

\$ *150.00*

*ONE HUNDRED AND FIFTY*

DOLLARS

WRITE IN ACCOUNT NUMBER

*3 - 456 - 463*

*[Signature]*

⑆054000043⑆

⑆0003456463⑆

⑆00000015000⑆

**Gordon J. Humphrey**  
**United States Senator**  
**New Hampshire**

**FOR IMMEDIATE RELEASE**  
**JULY 27, 1988**

**CONTACT: BILL ANTHONY**  
**202-224-2841**

**HUMPHREY STATEMENT ON THE COALITION FOR A WINNING TICKET**

WASHINGTON, D.C.--Attached is the statement of Senator Gordon J. Humphrey (R-NH) on the formation of the Coalition for a Winning Ticket.

-30-

9 2 0 4 0 9 2 2 5 2 8

**STATEMENT OF SENATOR GORDON J. HUMPRHEY  
ON THE COALITION FOR A WINNING TICKET  
JULY 27, 1988**

Today I am making an appeal to the Bush campaign and to the Republican Party to give conservatives a stake in the election by selecting as our vice presidential nominee someone from the majority wing of our party, the conservative wing. I appeal for the selection of a Ronald Reagan conservative.

To further that appeal, I am announcing today the formation of the Coalition for a Winning Ticket, which will be a rallying place for conservatives, now and in New Orleans. I want George Bush to win in November. I want the Republican Party to win. I want our candidates in New Hampshire to win.

But to win, we need a winning ticket at the top. George Bush needs to reassemble the conservative coalition of Republicans, Democrats and Independents who twice elected Ronald Reagan to the White House, the last time with a decisive 49 state sweep. If George Bush does not reassemble that coalition, he could well lose in November.

So far, the Bush campaign has not only failed to turn on conservatives, it has actually turned them off. Conservatives fear that George Bush will choose someone from the Republican establishment, some bloodless, split-the-difference Republican who will drive blue-collar America right into the arms of smiling Mike Dukakis.

The selection of Governor Thomas Kean of New Jersey to keynote the convention is an example. His selection is a slap in the face to millions of pro-life Americans who reject Kean's support for abortion. Those pro-life Americans were a key component of the Reagan coalition of 1980 and 1984.

The invitation to address the convention extended to Former Transportation Secretary William Coleman is another example. Bill Coleman testified against President Reagan's nomination of Robert Bork to the Supreme Court. A far better selection would have been former Assistant Secretary of State for International Affairs Alan Keyes, who is our U. S. Senate candidate in Maryland, and who, like Mr. Coleman, is a black American.

92040922529

We conservatives now look to the selection of a running mate as the acid test of whether George Bush cares about our support. George Bush has the delegates. It's his convention. We're not in a position to dictate. But we are appealing to him to give us a stake. We're appealing to him to turn on the party's conservative majority.

The Coalition for a Winning Ticket is not a stalking horse for any candidate. We are not naming names. We will draw up a list of attributes which we believe George Bush's running mate ought to possess. We feel its essential to victory have a Ronald Reagan conservative on the ticket, and over the next three weeks and in New Orleans we intend to try to persuade the Bush campaign and the Republican Party to this point of view.

In Atlanta, the Democrats gave their part's minority wing a place on the ticket in the selection of Lloyd Bentsen. It would be ironic, if by failure to select a conservative running mate, George Bush excluded the Republican majority wing from the ticket. Not only would it be ironic, I believe it would be politically fatal in November.

92040922530

# CMB INTERNATIONAL CORP.

MAILING ADDRESS  
 U.S. P.O. Box 18356  
 20th St. Sta. N.W.  
 Washington, D.C. 20036  
 (202) 334-8173

OFFICE ADDRESS  
 1926 K Street, N.W.  
 Suite 403, N.W.  
 Washington, D.C. 20006

(202) 457-5985  
628-3809

ESTIMATE / INVOICE

DATE

Item	Description	Quantity	Unit Cost	Total Cost
Printing	2000 L.H. 8 1/2 x 11	5000		628.30
Printing	2000 L.H. 8 1/2 x 14	5000		475.67
Printing	Envelopes	15000		930.00
Copying	2-sided press release	5000	.09	450.00
Copying	1-sided letter	5000	.035	175.00
Copying	2-property form	2500	.035	87.50
	cut charge			30.00
lettership	4 insert mailing	5000	80/M	400.00
Printing	Labels	15250		1487.00
Printing	Tickets 2000	8000		370.00
Printing	Banner	1		225.00
	Shipping			20.00
			Sub Total	5278.47
			Tax	316.71
			Balance Due	5595.18

*DAID*  
*PAID Aug. 11/88*

Sold By *[Signature]*  
 Payment Due Upon Receipt of Invoice  
 10% Late Fee is Assessed Over 10 Days.

Late Charge \_\_\_\_\_

92040922531

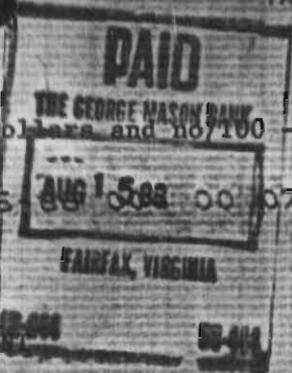


**FREE THE EAGLE, INC.**  
 11244 WAPLES MILL ROAD, SUITE 100  
 FAIRFAX, VA 22030

THE GEORGE MASON BANK  
 FAIRFAX, VIRGINIA  
 68-444/580

CHECK  
 NUMBER

5883



DATE 8-4-88

**PAY** One Thousand Four Hundred Dollars and no/100 \$ 1,400.00

08-15-88 1508 00 0705 607290659

TO THE  
 ORDER  
 OF

LINCOLN PROPERTY MANAGEMENT

*Marilyn Price*

⑆00005883⑆ ⑆05600445⑆ 002634 4⑆ ⑆000010000⑆

9 2 0 4 0 9 2 2 5 3 2

Lincoln Property Co.  
 Manager

**HIBERNIA**  
 National Bank  
 New Orleans, Louisiana 70161  
**FOR DEPOSIT ONLY**  
**LOYOLA ASSOCIATES**  
**OPERATING ACCOUNT**  
 026224721

08-15-88 1508 00 0705 607290659

AG 88 12  
 PAY ANY BANK, BANKER  
 OR TRUST CO., P.C.  
 YEARS COMMERCIAL BANK  
 22-22 DALLAS, TEXAS 75222

AG 88 11  
 HIBERNIA NAT'L BANK  
 NEW ORLEANS, LA  
 PAY ANY BANK, P.C.

14-8

# FREE THE EAGLE

Date 8-4-88 Date Needed 8-4-88

MAKE PAYABLE TO: LINCOLN PROPERTY MANAGEMENT

ADDRESS: 1100 Poydras Street  
New Orleans, Louisiana 70163

**PAID**

AMOUNT: \$ 1,400<sup>00</sup>

PURPOSE: Rent for 1/2 of suite #1205 for FTE dba  
"Coalition for a Winning Ticket" at Republican  
National Convention in New Orleans  
Contact: Mr. Tommy Crane, 504-569-2020

REQUESTED BY: Howard Segermark

APPROVED BY: H.S. by telephone

DATE PAID: \_\_\_\_\_

CODE: \_\_\_\_\_

92040922533

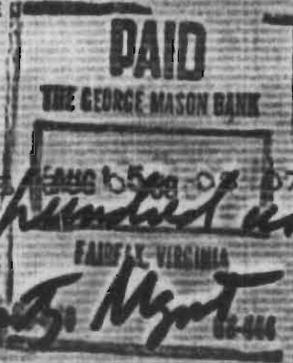


**FREE THE EAGLE, INC.**  
 11244 WAPLES MILL ROAD, SUITE  
 FAIRFAX, VA 22030

THE GEORGE MASON BANK  
 FAIRFAX, VIRGINIA 22030  
 68-444/560

CHECK NUMBER 5891

PAY



DATE

1400.00

TO THE ORDER OF

Fourteen hundred and no/100 dollars  
 Lincoln Property Mgmt

H. Sargent

⑆00005891⑆ +⑆056004445⑆ 002634 ⑆

⑆0000140000⑆

Lincoln Property Co. 2 2 5 3 4  
 Manager U 4 0 9

**HISBERNIA**  
 National Bank  
 New Orleans, Louisiana 70161  
 FOR DEPOSIT ONLY  
 LOYOLA ASSOCIATES  
 CORP. TRUSTING ACCOUNT  
 22624721

AG 88 12  
 PAX BANK BALTIMORE, MD 21201  
 08-15-88 004 100 0705 6072250560

AG 88 12  
 PAV ANY BANK, BANKER  
 ON TRUST CO., P.E.B.  
 TEXAS COMMERCIAL BANK  
 32-115 DALLAS, TEXAS 75215

AG 88 11  
 HISBERNIA NAT'L BANK  
 NEW ORLEANS, LA  
 PAV ANY BANK, P.E.B.

⑆0000140000⑆

⑆00005891⑆

Coalition For A Winning Ticket

Disbursements

Date	Payee	Check#	Amount	Description
Aug. 1	1st Amer. Bank Cashier's Check	1*	\$ 1,275.00	CMB Int'l- Printing
Aug. 1	Bank Charge		20.00	
" 4		2*	-----	Voided
" 8	Dan Perrin	3*	330.86	N.O. Expenses
" 8	Dan Perrin	4*	850.00	Consulting
" 8	Delta Airlines	5*	474.00	Perrin Ticket
" 9	Capstone	6*	425.00	Mailing List: Rental for Fund- Raising Letter
" 9	1st Amer. Bank Cashier's Check	7*	1,255.00	CMB-Int'l Postage for Fund- Raising Letter
" 9	CMB Int'l	8*	1,827.37	Printing of Labels
" 9	Capstone	9*	125.00	Mailing List
" 9		10*	-----	Voided
" 9	Central Prints Inc.	11*	79.57	Xerox Paper
" 9	Sights & Sounds	12*	118.80	TV Rental
" 15	Audubon Computer Rentals	13*	378.16	Computer
" 15	General A.V.	14*	500.00	Walkie- Talkies
" 16		15*	-----	Voided

9 2 0 4 0 9 2 2 5 3 5

92040922536

"	11	Lee Livingston	16*	450.00	Consulting
"	10	Dan Perrin	17*	1,125.00	Consulting
"	11	CMB Int'l	18*	5,595.18	Mailing- Printing Labels- Postage
"	14	Perrier Party Rentals	19*	44.14	Chairs for Meeting
"	26	The Borden Group	1001*	3,684.48	N.O. Expenses
"	26	N.Y. Times Syndication Corp.	1002*	100.00	Reprint Rights for Tabloid
"	26	Talent Tree	1003*	325.44	Temps for D.C.
"	26	Tom Cox	1004*	284.88	N.O. Expenses
"	26	Dan Perrin	1005*	770.00	Consulting & N.O. Expenses
"	26	Paul Marleau	1006*	42.22	CWT Expenses
"	26	Lincoln Property Management	1007*	129.00	Office Space
"	31	F.T.E.	1008*	4,462.00	N.O. Expenses
"	31	John Smith	1009*	149.97	N.O. Expenses
"	17	Windsor Court Hotel	Un-numbered*	100.00	Deposit
"	19	Cash	Un-numbered*	150.00	Dan Perrin Western Union
8/	1	Q. C. Crommelin	1010*	1,500.00	Consulting & N.O. Expenses

9 2 0 4 0 9 2 2 5 3 7

8/ 1	Dan Perrin	1011*	425.00	Consulting
8/ 1	Dan Perrin	1012*	20.50	N.O. Expenses
8/ 22		1013*	-----	Voided
10/ 3	1st American Bank	*	23.75	Charge for Checks
10/ 14	The Borden Group	1014*	2,500.00	Consulting
10/ 18		1015*	-----	Voided
10/ 18	Q. C. Crommelin	1016*	1,121.85	Consulting & N.O. Expenses
10/ 27	The Borden Group	1017*	1,000.00	Consulting
11/ 9	The Borden Group	1018*	1,500.00	Consulting
11/ 9		1019*	-----	Voided
			(33,162.17 -- 1988)	
1989				
3/10	Free the Eagle	1020*	10,000.00	CWT N.O. Expenses
3/28	Sen. Humphrey	1021*	1,036.63	CWT N.O. Expenses
3/28	Free the Eagle	1022*	1,120.13	N.O. Expenses
3/28	Kentwood Coffee Service	1023*	128.40	CWT N.O.
5/25	Alan P. Dye	1025*	636.80	Legal Expenses
6/30	Bank Service Charge		3.87	
Total Disbursements from checking account through July 31, 1989			46,088.00	

Coalition For A Winning Ticket

Breakdown of Disbursements made by FTE on Behalf of CWT  
and Re-imbursed to FTE

<u>Date</u>	<u>Payee</u>	<u>Amount</u>
8/2	Capitol Hill Club (CWT meeting)	\$ 77.40
8/4	Lincoln Property Management (for office rental)	1400.00
8/4	Amerisystems (telephones for CWT office)	1482.00
8/5	Travel Expenses for FTE Staff	300.00
8/5	Federal Express	28.00
8/9	George Friedman (rent for housing)	500.00
8/9	Lincoln Property Management (for office rental)	1400.00
8/9	Office Supplies	68.03
8/11	Mahagony House (food expense)	96.90
8/12	Hotel Intercontinental (food expense)	11.36
8/12	Val de Loire (food expense)	102.90
8/14	Hotel Intercontinental (for CWT staffer)	252.00
8/14	Hotel Intercontinental (food expense)	28.47
8/16	The Letterhead & Business Card Co. (CWT stationery)	1253.50
8/16	D.C. Staff Lunch	27.00
8/16	Westpark Travel (travel to N.O.)	576.00
8/16	Creative Types (printing tabloid)	456.75
8/20	Hampton's Hallmark (flowers)	114.48
8/22	Creative Types (printing tabloid)	966.44
8/22	Travel (re: Creative Types)	13.59

92040922538

(2)

8/29	Budget Rent-A-Car	390.50
9/1	C&P Telephone (D.C. Office)	67.95
9/9	Sprint Telephone (D.C. Office)	599.87
9/11	C&P Telephone (D.C. Office)	339.45
9/12	Delta (excessive baggage charge)	320.00
9/17	Sprint Telephone (D.C. Office)	21.61
9/30	Capitol Hill Club (Petroleum Club press luncheon)	1052.97
10/4	Hyatt Regency Crystal City (CWT meeting -- 7/25/88)	281.73
10/4	Federal Express	25.00
10/5	FTE Staff Expenses (in N.O.)	149.97
10/5	Howard Segermark (N.O. expenses)	302.80
August/88	FTE staff time billed to CWT	<u>2875.46</u>
		15582.13

92040922539

A Summary of Activities: The Coalition For A Winning Ticket

Political Overview:

The Coalition For A Winning Ticket was formed to prevent what conservatives were confident would be a prescription for a Republican defeat in the Presidential election of 1988. Specifically, that Vice President George Bush would select a moderate, "establishment" Republican as his running mate.

Such a choice would have threatened to leave the Reagan, or conservative wing of the Republican Party alienated and without a stake in the November election. That result could have meant that the grassroots activists and nationwide organization representing such Reagan conservatives would have "sat on their hands" causing a Republican defeat.

Furthermore, conservatives asserted, the necessary "Reagan-Democrats," blue collar, Catholic, and "Middle American" votes garnered by Reagan in 1980 and 1984 would have felt equally alienated by the return of the "country-club" Republican party, and vote, as then current polls showed they would, for Michael Dukakis.

The primary objective that the Coalition For A Winning Ticket sought was the selection of a Reagan Conservative as George Bush's running mate. The objective was met. It is impossible to quantify the extent to which the Coalition For A Winning Ticket affected the Bush decision; however, it is generally accepted that CWT played a significant, possibly crucial role in the decision to select Senator Dan Quayle as the Republican Vice Presidential nominee.

Historical Summary:

On July 20, 1988 the Coalition For A Winning Ticket hired Dan Perrin as Executive Director. The same day, letters (copy attached) to prominent conservative organizations and individuals were mailed inviting the addressee to attend the first Coalition For A Winning Ticket meeting on Monday, July 25th, 1988.

The meeting lasted three hours and was a success. The Coalition for a Winning Ticket was formed.

Washington office space was provided by Free The Eagle, a national grassroots conservative organization with a membership of over 250,000.

92040922540

Two days after the initial CWT meeting, its chairman and sole spokesman, Senator Gordon Humphrey (R-NH) held a press conference to announce the formation of The Coalition For A Winning Ticket.

Throughout the initial week of operation, the Coalition's membership continued to grow. On August 1, 1988, virtually all the Republican Delegates and Alternates were mailed a letter explaining why CWT was formed, its goals, and a copy of Senator Humphrey's press release of July 27th. Addressees were also asked to join.

On August 4, 1988, Senator Humphrey held a well attended press conference where he announced the profile of acceptable conservative candidates, as well as the membership list of CWT through that date: 25 local and 48 nationwide conservative organizations.

Prior to the Convention in New Orleans, funds had to be raised, office space, phones, computers, a FAX machine, and photo copier had to be procured, and CWT stationary, envelopes, lapel stickers designed and printed. Other logistics in New Orleans, arranging for, and including volunteers, and staff housing within budget constraints had to be resolved.

The CWT tabloid had to be laid out and its content set. Fortunately, throughout this period, membership in the Coalition continued to grow. Delegates throughout the country were surveyed by phone for their views and a meeting in New Orleans with delegates and CWT delegate leadership was scheduled.

A press luncheon was arranged for Saturday August the 13th and Senator Humphrey appeared on "Nightline" on August 12th and on "Meet the Press" on Sunday, August the 18th, the day before the convention started. At that point, with over 130 members and 25 organizations on board, CWT was on the move.

On Saturday, August 13, every major hotel in New Orleans was delivered, room by room, a copy of the CWT tabloid and memorandum on the "gag rule" change which prevented delegates from voting for any Vice Presidential candidate, and only allowed them to vote to acclaim or not to acclaim a Vice Presidential nominee.

On Sunday, August 14th a delegates meeting was held and addressed by Senator Humphrey. Petitions were passed out and sympathetic delegations surveyed (and in many cases secured) for a possible floor fight on the "gag rule" or for support of the nomination of an alternative Vice Presidential candidate.

On Monday, August 15th at 2:00 pm the Rules Committee met and heard testimony from Senator Humphrey against the "gag rule" and voted (by voice vote) to retain the gag provision. Senator Humphrey held a impromptu press conference preceding his testimony and a formal press conference after the vote of the

9 2 0 4 0 9 2 2 5 4 1

Convention Committee on Rules. A short but well covered demonstration by YAF and College Republicans added to the news value of the Rules Committee fight.

In contact with the press, Humphrey continued to emphasize the importance of selecting a conservative nominee for Vice President in order to unify the Party and retain the Reagan consensus of 1980 and 1984.

The following day, Tuesday, August 16th at 2:06 pm, Republican Presidential nominee, Vice President George Bush announced conservative Senator Dan Quayle as his running mate for the 1988 Republican Presidential campaign.

CWT hailed the selection and advised the press and delegates that its goals had been met. CWT gave out 10,000 of its lapel stickers which were changed from "I WANT A CONSERVATIVE V.P." to "I GOT A CONSERVATIVE V.P."

CWT closed out its New Orleans offices, and headed home, victorious.

92040922542

COPY

*Official Transcript*

**1988**

**REPUBLICAN NATIONAL CONVENTION**

**New Orleans, Louisiana**

COMMITTEE ON RULES AND ORDER OF  
BUSINESS

Meeting of Committee on  
Rules and Order of Business, held on  
Monday, August 15, 1988, Hilton  
Hotel, Grand Ballroom B, New  
Orleans, Louisiana. *2:00-3:30 p.m.*

REPORTED BY: MARY VIRGINIA HUGHES  
HUGHES, PENDLETON & ASSOCIATES  
Suite 1013, 333 St. Charles  
New Orleans, Louisiana 70130

*Asher & Associates, Inc.*  
*Certified Shorthand Reporters*

Suite 903  
3421 North Causeway Boulevard  
Metairie, Louisiana 70002

504/831-4096

92040922543

1                    comments to be made.

2                    So if there is no  
3                    objection, the gentleman from New  
4                    Hampshire, the distinguished  
5                    Senator, Gordon Humphrey is asked to  
6                    come forward, use the podium to the  
7                    right of the chair and address to  
8                    the committee at this time. Senator  
9                    Humphrey.

10                   SENATOR HUMPHREY:

11                   Thank you, Mr. Chairman and  
12                   Ladies and Gentlemen. In accordance  
13                   with the chairman's wish and  
14                   instructions, I will keep this  
15                   brief.

16                   I want to sincerely thank  
17                   the distinguished chairman Dick  
18                   Cheney for accommodating my request  
19                   to address the committee at this  
20                   juncture. I am grateful for that  
21                   and the committee's approval of that  
22                   recommendation.

23                   I am here to appeal,  
24                   frankly, appeal to the committee's  
25                   decision to adopt a change in the

92040922544

1 rules.

2 The change to which I speak  
3 is that change which would have the  
4 effect of eliminating a roll call  
5 vote of the states on the nomination  
6 for Vice President.

7 Now I recognize that the  
8 proposed change eliminating a roll  
9 call vote of the states would apply  
10 only in the case where there is a  
11 single nominee for the position of  
12 Vice President before the  
13 convention. But it is entirely  
14 possible -- and perhaps probable  
15 -- that that will be precisely the  
16 situation before this convention.

17 In such a situation, then,  
18 what is the effect of the rules  
19 change? The effect is to deny to  
20 each and every delegate the  
21 opportunity to express a preference  
22 for a person other than the person  
23 who is the single nominee before the  
24 convention.

25 Depriving each delegate of

92040922545

1 the right to exercise and publicly  
2 record his judgment, is in a word,  
3 just plain unfair.

4 It is undemocratic. And  
5 may I observe, it would portray our  
6 party and our nominees as arbitrary  
7 and highhanded, stiffling of  
8 dissent.

9 Please, don't put our party  
10 and our nominees in that light.

11 For these reasons, I urge  
12 the committee to reconsider the  
13 proposed rule. I urge the committee  
14 to leave the rule unchanged. It has  
15 served us well in the past; it  
16 served us well in Detroit and in  
17 Dallas. And when all is said and  
18 done, I believe it will serve us  
19 well in New Orleans.

20 Now I understand the wish  
21 to streamline the convention. I  
22 understand the wish to save time.  
23 But my colleagues' democracy has  
24 never been claimed to be efficient,  
25 nor has anyone claimed that

92040922546

1                   dictatorship is Democratic.

2                   It just won't do for us to  
3                   deprive delegates of their right and  
4                   their obligation to publicly express  
5                   their preference in a roll that will  
6                   call on the states in the nomination  
7                   for the vice presidency.

8                   Some might say let those  
9                   who wish place a second nomination  
10                  before the convention. Let's look  
11                  at that option. What does it take?

12                  Under the rules, the  
13                  delegate who wishes to place the  
14                  nomination before the convention  
15                  must secure the support of five  
16                  delegations. With a majority of  
17                  delegates in each of those  
18                  delegations, we support such an  
19                  effort.

20                  This is a very high hurdle,  
21                  I am sure you will agree. It is  
22                  intended to be a high hurdle to  
23                  prevent frivolous nominations being  
24                  placed before the convention.

25                  But under the proposed rule

92040922547

1 change, then, what recourse is  
2 available to those delegates who  
3 wish to express dissent, and who do  
4 not have the time or the resources  
5 to gather support from five  
6 delegations.

7 The recourse to express  
8 dissent in such a case is for a  
9 delegate to instruct the chairman of  
10 his delegation to announce a vote  
11 for another candidate when the roll  
12 of states is called.

13 In Detroit, there was only  
14 one nomination for Vice President,  
15 as I recall, before the convention;  
16 nonetheless, each delegate, every  
17 one of us, had the opportunity to  
18 vote for another person if we chose  
19 to do so, when the roll of states  
20 was called.

21 In fact, there were a  
22 substantial number of votes, if you  
23 will recall, for persons other than  
24 the single nominee before the  
25 convention.

92040922548

1                   And, therefore, I urge the  
2                   committee to preserve that right,  
3                   and that option. It would be  
4                   undemocratic and unfair to eliminate  
5                   the precious right of each delegate  
6                   to express publicly his preference.  
7                   It is just plain wrong to block a  
8                   roll call vote of the states by  
9                   moving to vote by acclamation before  
10                  beforehand.

11                  Acclamation is fine, we are  
12                  all for it, I will support it fully,  
13                  but in its proper place of  
14                  following a roll call vote for the  
15                  Vice President.

16                  Again I thank you all the  
17                  members for the indulgence and  
18                  suffering. I hope it hasn't been  
19                  too much suffering. I appeal to  
20                  your sense of democracy and your  
21                  sense of fairness for the sake of  
22                  our nominee and for the sake of our  
23                  party. Thank you.

24                  CONGRESSMAN CHENEY:

25                  The chair will note the

92040922549

**Gordon J. Humphrey**  
**United States Senator**  
**New Hampshire**

July 20, 1988

Fellow Conservative:

Is there not a cause?

In just a few weeks before the Republican National Convention gathers in New Orleans, who will call for a strategy of victory in Central America, for the defeat of Communism in southern Africa and Afghanistan, for an end to Federal subsidies which promote abortion and homosexuality, for a timetable to deploy the Strategic Defense Initiative, for cuts in Federal spending and taxes, for a rollback of Federal regulatory authority in nearly every area from housing to health care, for an end to U.S. taxpayer subsidies to the Soviet Union and its allies?

Conservatives gained control of the Republican Party in 1964, but even when our candidates have been nominated, liberals have dominated the Executive branch ever since.

I mean to do something about this. I mean to correct the imbalance. Whereas the conservative minority in the Democratic Party is represented on its national ticket, it is ironic that the conservative majority in the Republican Party may well be shut out from participation in the election, the transition, and the four years that follow.

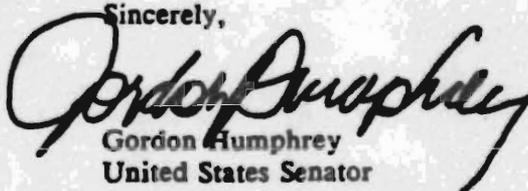
We conservatives need to do more than complain. We need to present ourselves as a constructive and essential component of a Republican victory strategy for 1988.

On Monday, July 25, I invite you to join me and several other conservative leaders in planning an effective conservative strategy which can be brought to bear in the days leading up to New Orleans, at the national convention, during the campaign, during the transition, if there is one, and during the administration which follows.

Please RSVP to Dan Perrin, Executive Director, Committee for a Winning Ticket, at (202) 638-0080. The meeting will be held at a location in the Washington, D.C. area.

With personal best wishes, I am

Sincerely,



Gordon Humphrey  
United States Senator

P.S. Please keep this invitation strictly confidential. No substitutes will be permitted. You will be advised of the meeting location after you notify us of your intention to be present.

92040922550

**A) Statement of Purpose**

Our goal is to mount an effort which will:

Identify and build support for conservative and Judeo-Christian political and policy objectives during the 1988 campaign and the four years which follow.

We will seek, by persuasion and strength, to build support for our objectives among the general public and within the Bush campaign so as to make the Bush candidacy more worthy of support and more electable if it becomes responsive to the concerns and objectives which we convey.

We will also seek to maximize our influence on the Bush transition, if he is elected, and on the Bush administration which would follow.

We intend to provide leadership for our cause before, during, and after the New Orleans convention, whether or not there is a Bush administration.

The degree of our success will be measured in the first instance by the Bush vice presidential choice, the Bush platform, and by publicly asserted Bush commitments with respect to personnel and procedures during a prospective Bush transition and Bush administration. *policy*

**B) Operational Priorities**

- 1) A meeting will be held as soon as possible to include only principals representing major conservative and Judeo-Christian constituencies. The meeting will be confidential. The purpose of this meeting will be to delineate the concerns which each of the constituency representatives seek to have addressed and satisfied by Vice President Bush. The meeting will also set forth specific procedural objectives, as for example, relating to representation in campaign strategy councils and on the campaign staff, personnel appointments to the executive branch during the balance of the Reagan administration, legislative and policy initiatives during the balance of the Reagan administration, participation in key elements of the transition process, personnel commitments for 1988 and 1992, and policy commitments for 1988 to 1992. Emphasis will also be placed on the assignment of Bush campaign funds.
- 2) A committee will be designated to convey these concerns and recommendations personally to the Vice President, and to elicit a specific response.
- 3) Following the meeting between the committee and the Vice President, the larger group will meet again to discuss consequent action.
- 4) If the group's requests are not met to its satisfaction, specific actions to be taken at the New Orleans convention and in the post-convention period will be considered.
- 5) The group will communicate appropriate elements of information concerning its existence, its objectives, and its activities to the media in a manner to be agreed to upon the initial meeting.
- 6) Consideration will be given to the possibility of a national information campaign, which will include briefings of state delegations, prior to and during the national convention.

92040922551

---

---

# COALITION FOR A WINNING TICKET

---

---

GORDON HUMPHREY, U.S. SENATE  
Chairman

Dear Fellow Conservative:

I'll be blunt.

I'm asking you to give at least \$250 to as important a project as we conservatives will undertake in this election year.

And that project is to convince George Bush to pick a conservative as his running mate if we are to defeat liberal Michael Dukakis.

Take a second to read the press release I issued at a news conference in the Senate Press Gallery. More than ever grassroots conservatives need to take the lead in assuring that we have a winning ticket and a winning platform. That's why I formed the "Coalition For A Winning Ticket."

As you read this the Republican Convention is ready to convene in New Orleans and I will need your support and that of others to make this project a success.

We are planning daily strategy meetings with delegates and other non-delegate leaders in New Orleans. We will hold press briefings on our efforts to have as much input as possible until Mr. Bush makes his selection on the final day of the convention.

So we don't have much time. Time is so short, in fact, that I'm asking you to send your donation directly to me in New Orleans instead of Washington. That way I'll have an up-to-the-minute list to release to the press of members of the Coalition.

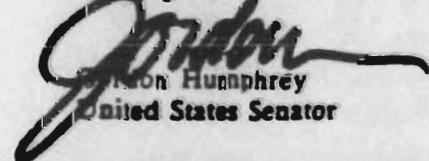
Believe me, this is a cause worth fighting for! And there are issues worth fighting for! A Strong National Defense! Balanced Budget Amendment! Right to Life! No Tax Hike! Right to Keep and Bear Arms! Aid to the Contras and other Freedom Fighters! Line Item Veto! Deployment of SDI! Defunding the Left! The list goes on and on!

In all my years in the U.S. Senate I've lead many fights on issues important to our conservative principles and to our country. But this one is as important, if not more so, than any of them so please don't let me down.

We're already committed to a budget of \$50,000 so please send me your \$250, your \$500, even your \$750 or \$1,000 payable to Coalition For A Winning Ticket to my personal attention in New Orleans.

Time is so valuable and this project so important, if you have any questions, call me in New Orleans at (504) 528-2252, or my Executive Director, Dan Ferrin at the same number.

Best regards,

  
Gordon Humphrey  
United States Senator

92040922552

August 1, 1988

Dear Delegate:

Please, if you believe it's essential (as I certainly do) for George Bush to choose a conservative running mate, take the time to read the enclosed press release which I issued on July 27th, during a news conference in the Senate Press Gallery.

In less than two weeks the Republican Convention begins in New Orleans. More than ever grassroots conservatives need to take the lead in assuring that we have a winning ticket and a winning platform. That is why I have formed the "Coalition For A Winning Ticket."

I very much need the support of you and other conservative leaders to lend your name to this important undertaking. We need to communicate to the Vice President, his top aides and the public, that conservatives do not feel adequately represented in the Convention, in the campaign and on the ticket. The Coalition For A Winning Ticket has planned daily and separate meetings for delegates and non delegate leaders, press conferences, and Convention floor activities.

There is a cause worth fighting for! There are issues worth fighting for! Right to Life! Aid to the Contras and other freedom fighters! Right to keep and bear arms! Balanced Budget Amendment! Line Item Veto! Deployment of SDI! No Tax Hike! Defunding the Left! And on and on!

If you agree with me, please let me know where you will be staying so that I can get in touch with you in New Orleans by returning the enclosed reply form today.

I will be holding a press conference soon and if you get your reply back to me quickly I will include your name as a member of our coalition. I will be in touch with you before the convention with a list of conservative leaders that have joined the "Coalition for A Winning Ticket."

Best Regards,

Gordon Humphrey

92040922553

United States Senator

Dear Senator Humphrey, I am pleased to learn that you are forming a Coalition to urge George Bush to select a conservative for a Vice President to campaign this fall on a solid conservative platform.

You may include my name when you release to the press the names of the members of your Coalition For A Winning Ticket.

Address at the Convention \_\_\_\_\_.

\_\_\_\_\_.

Phone: \_\_\_\_\_.

Signature \_\_\_\_\_.

I would also like to give my financial support. Enclosed is my optional \$100.00 membership fee. Other \_\_\_\_\_.

If you have any questions, please write: Dan Perrin, Executive Director, The Coalition For A Winning Ticket, 25 E Street N.W. 8th Floor, Washington, D.C. 20001 or call (202) 638-0080.

92040922554

---

---

# COALITION FOR WINNING TICKET

---

---

GORDON HUMPHREY, U.S. SENATE  
Chairman

## Press Release

FOR IMMEDIATE RELEASE  
AUGUST 11, 1988

CONTACT: D.C. BILL ANTHONY  
202-224-2841  
N.O. HOWARD SEGERMARK  
504-582-2252

### COALITION FOR A WINNING TICKET OPENS NEW ORLEANS HQ

WASHINGTON, D.C.--U.S. Senator Gordon J. Humphrey, R-NH, Chairman of the Coalition for a Winning Ticket, today announced that the Coalition has opened its headquarters in New Orleans (across the street from the Hyatt Regency Hotel and near the site of the Republican National Convention). "The Coalition for a Winning Ticket will be very active in New Orleans. Our office is at 1100 Poydras Street, Suite 1205. We have ten full-time staff and a host of volunteers from Young Americans for Freedom and the Young Republicans," Humphrey said.

The Coalition for a Winning Ticket, formed by Senator Humphrey, is supported by 48 prominent leaders of conservative organizations with a grass roots following of hundreds of thousands of conservative activists, as well as a large number of delegates to the GOP convention. The goal of the organization is to unite the voices of conservatives across the country and at the convention in pleading with George Bush to choose a Reagan conservative as his running mate.

Members of the Coalition and its supporters will be wearing lapel stickers in New Orleans designating, "I want a conservative running mate." A petition will be circulated in New Orleans urging Vice President Bush to select a conservative on the ticket. The Coalition will ask for a meeting with the Vice President in order to present him with the petitions.

Humphrey added, "We plead with Vice President Bush not to choose someone from the establishment wing of our party. We need someone who will bring new strengths to the ticket. But a middle-of-the-road establishment Republican will drive conservative Democrats and independents in even greater numbers into the smiling embrace of Mike Dukakis."

"Conservatives need a sign that they are wanted, that they are needed, and that they will have a place in the Bush administration. Conservatives need to be given a stake in November. We want George Bush to win. We want all our candidates to win. That's why we need a winning ticket at the top."

- 30 -

92040922555

---

---

# COALITION FOR A WINNING TICKET

---

---

GORDON HUMPHREY, U.S. SENATE  
Chairman

## Press Release

FOR IMMEDIATE RELEASE  
AUGUST 11, 1988

CONTACT: BILL ANTHONY  
D.C.: 202-224-2841  
N.O.: 504-582-2252

HUMPHREY: "POLLS SHOW NEED FOR CONSERVATIVE V.P. CHOICE."

WASHINGTON, D.C. --U.S. Senator Gordon J. Humphrey (R-NH), Chairman of the Coalition for a Winning Ticket, today highlighted poll data which found that 30 to 40 percent of conservative voters plan to vote for Governor Michael Dukakis in November. "This evidence that George Bush is not turning on conservatives is proof that he should select a conservative running mate and not to turn to the establishment wing of the party for his vice president," Humphrey emphasized.

According to a recent NBC/Wall Street Journal poll, 33 percent of "self-identified conservative voters" plan to vote for Dukakis, and a Harris poll found that 39% of conservative voters support the Democratic candidate. "George Bush cannot afford to lose the voters who carried the Reagan-Bush ticket to decisive victories in 1980 and 1984. That winning coalition needs to know that it has a place in a George Bush administration."

Humphrey added, "that a conservative platform is welcome, but it will by no means count as much as the selection of a committed conservative running mate."

Humphrey formed the Coalition for a Winning Ticket and plans to make the Coalition the vehicle to urge Vice President Bush to choose a conservative running mate. He noted that over 30 organizations representing thousands of conservative activists will be represented in New Orleans "in order to stave off an impending disaster for the Republican party in November."

- 30 -

92040922556

---

---

# COALITION FOR A WINNING TICKET

---

---

GORDON HUMPHREY, U.S. SENATE

Chairman

Press Release

For Further Information:

Mark Fam - In D.C. 202-548-3692

Howard Segermark - In New Orleans 504-582-2252

## Press Release

---

### PRESS ADVISORY

---

THE COALITION FOR A WINNING TICKET (CWT), AND ITS CHAIRMAN, SENATOR GORDON HUMPHREY, WILL BE HOSTING A BUFFET LUNCHEON FOR ALL MEMBERS OF THE MEDIA ON SATURDAY, AUGUST 13, 1988 AT 12:00 PM AT ITS NEW ORLEANS HEADQUARTERS, SUITE 1205, 1100 POYDRAS STREET. OVER THIRTY NATIONAL ORGANIZATIONS, HUNDREDS OF CONSERVATIVE LEADERS, AND REPUBLICAN DELEGATES AND ALTERNATES HAVE JOINED THE COALITION IN ORDER TO URGE VICE-PRESIDENT BUSH TO SELECT A CONSERVATIVE RUNNING MATE.

---

Note: On August 1, Senator Humphrey sent the following letter to GOP delegates and alternatives:

Dear Fellow Delegate:

Please, if you believe it's essential (as I certainly do) for George Bush to choose a conservative running mate, take the time to read the enclosed press release which I issued on July 27th, during a news conference in the Senate Press Gallery.

In less than two weeks the Republican Convention begins in New Orleans. More than ever grassroots conservatives need to take the lead in assuring that we have a winning ticket and a winning platform. That is why I have formed the "Coalition For A Winning Ticket."

I very much need the support of you and other conservative leaders to lend your name to this important undertaking. We need to communicate to the Vice President, his top aides and the public, that conservatives do not feel adequately represented in the Convention, in the campaign and on the ticket. The Coalition For A Winning Ticket has planned daily and separate meetings for delegates and non-delegate leaders, press conferences, and Convention floor activities.

There is a cause worth fighting for! There are issues worth fighting for! Right to Life! Aid to the Contras and other freedom fighters! Right to keep and bear arms! Balanced Budget Amendment! Line Item Veto! Deployment of SDI! No Tax Hike! Defunding the Left! And on and on!

If you agree with me, please let me know where you will be staying so that I can get in touch with you in New Orleans by returning the enclosed reply form today.

I will be holding a press conference soon and if you get your reply back to me quickly I will include your name as a member of our coalition. I will be in touch with you before the convention with a list of conservative leaders that have joined the "Coalition For A Winning Ticket."

Best Regards,  
(Signed)  
Gordon Humphrey

---

1100 Poydras Street • Suite 1205 • New Orleans, LA 70167 • (504) 582-2252 • Fax (504) 582-2252

---

92040922557



**FREE THE EAGLE, INC**  
 11244 WAPLES MILL ROAD, SUITE 200  
 FAIRFAX, VA 22030

THE GEORGE MASON BANK  
 FAIRFAX, VIRGINIA  
 68-444/560

CHECK NUMBER

6131

PAY

THE SUM 170 Dollars and 00 CENTS

**PAID**  
 THE GEORGE MASON BANK  
 OCTO 3 88  
 FAIRFAX, VIRGINIA

DATE

029202239 03 00885556 09-30-88 2  
 09-27-88 \*\*\*\*\*170.00

TO THE ORDER OF

FEDERAL EXPRESS CORPORATION  
 P.O. BOX 1140 DEPT. A  
 MEMPHIS, TN 38101--114

*Marilyn J. Price*  
 0000017000

⑆00006131⑆+⑆05600445⑆ 002634 4⑆

**FEDERAL EXPRESS**

BILL TO: FREE THE EAGLE  
 25 E STREET NW 8TH  
 WASHINGTON, DC 20001

RECIPIENT ACTIVITY SUMMARY

COUPON FOR A WINNING TICKET

PAGE 1 OF 2  
 DATE 08/19/88

INVOICE NO. 6-539-49471 ACCOUNT NO. 1070-7720-0

TRACKING NOS REFERENCE	SENDER'S NAME AND ACCOUNT ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
9991922530	Laurie McCarron REPUBLICAN NAT'L CONV/SUPERDOME 1500 POYDRAS ST 5RD FLR NEW ORLEANS, LA 70112	LEE LIVINGSTON FREE THE EAGLE 25 E STREET NW 8TH WASHINGTON, DC 20001 AA DELIVERED 08/08/88 10:16 SIGNED: L.PERRY	1/ NA	OVNIGHT LTR	14.00	
3201262 1	SHIPPED 08/05/88 BY 118965256					14.00
8934769524 *	Niki Atcheson REPUBLICAN NATIONAL COMMITTEE 310 FIRST ST SE WASHINGTON, DC 20003	LEE LIVINGSTON FREE THE EAGLE 25 E STREET NW 8TH WASHINGTON, DC 20001 AA DELIVERED 08/08/88 10:16 SIGNED: L.PERRY	1/ NA	OVNIGHT LTR	14.00	
3201262 1	SHIPPED 08/05/88 BY 020013397					14.00
RECIPIENT SUBTOTAL			28.00	PAY THIS AMOUNT	28.00	

FEC-M-145 9/84

9204

⑆00000000⑆

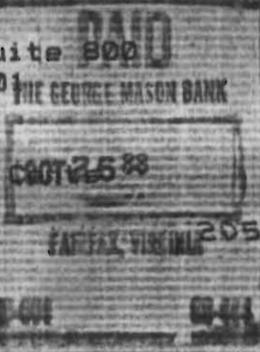
⑆004000084⑆  
 FEDERAL BANK  
 MEMPHIS, TN  
 FED EX  
 50-0088550

10-03-88

FREE THE EAGLE, INC.  
1244 WAPLES HILL ROAD, SUITE C  
FAIRFAX, VA 22030  
25 E Street, N.W., Suite 800  
Washington, D.C. 20001

THE GEORGE MASON BANK  
FAIRFAX, VIRGINIA 22030  
68-444/580

CHECK NUMBER 6241



PAY

THE SUM 456 Dollars and 75 CENTS 10-19-88 \*\*\*\*\*456.75

TO THE ORDER OF CREATIVE TYPES  
1930 ISAAC NEWTON SQ, #115  
RESTON, VA 22090

*Marilyn J. Price*  
⑈00006241⑈+⑈056004445⑈ 002634 4⑈ ⑈0000045675⑈

92040922559

0520-0027-8  
0520-0027-8  
205402250 10-25-88

Creative  
Types

Free  
The Eagle

Invoice # 7293

Date 8-16-88

Customer Job #

Date	Job #	Description	Amount	Balance
8-16	0088-39	Previous Balance/Payment Received  Lab (Brad) Type & Graphics only  Coal & Winning Ticket  <b>PAID</b>	\$ 456 <sup>75</sup>	\$ 456 <sup>75</sup>

Pay most recent invoice.

PAY THIS AMOUNT

A carrying charge of 1% will be applied to all amounts not paid within 30 days of invoice date.  
All collection expenses are recoverable.

92040922560



**FREE THE EAGLE, INC.**

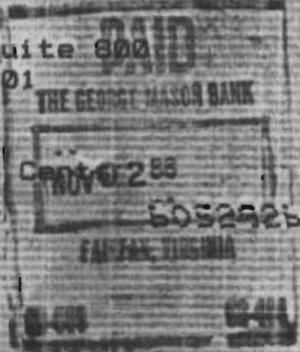
1334 WARLES MILL ROAD, SUITE 800  
FAIRFAX, VA 22030  
25 E Street, N.W., Suite 800  
Washington, D.C. 20001

THE GEORGE MASON BANK  
FAIRFAX, VIRGINIA 22030  
68-444/660

CHECK NUMBER **6286**

PAY

THE SUM 250 Dollars and 00 Cents **10-27-88** \*\*\*\*\*250.00



TO THE ORDER

OF CREATIVE TYPES  
1930 ISAAC NEWTON SQ, #115  
RESTON, VA 22090

*Marilyn J. Price*

⑆00006286⑆ + ⑆056004445⑆ 002634 4⑆ ⑆0000025000⑆

920409225

creative Types

11-02-88

11-02-88

58071821 7HL18L8

0520-0027-B  
0520-0922-B  
0522-2225-B 11-02-88



**FREE THE EAGLE, INC.**

1244 WARLER MILL ROAD, SUITE 800  
FAIRFAX, VA 22030  
XXXXXXXXXXXXXXXXXXXX  
25 E Street, N.W., Suite 800  
Washington, D.C. 20001

THE GEORGE MASON BANK  
FAIRFAX, VIRGINIA 22030  
88-444/560

CHECK  
NUMBER

6351

PAY

THE SUM 716 Dollars and 44 Cents

DATE 11-09-88

\*\*\*\*\*716.44

TO THE  
ORDER

OF CREATIVE TYPES  
1930 ISAAC NEWTON SQ, #115  
RESTON, VA 22090

*M. Wilson*

⑆00006351⑆+⑆056004445⑆ 002634 4⑆

⑆0000071644⑆

CREDITIVE 9-ROSA 09222562

488583214

11811107

00-53-71-244581905  
SOD185442 11-15-88 004 00 2450  
0000-0000-0000

Creative  
Types

Free the Eagle  
PO Box 1330  
Fairfax VA 22030-1330

Invoice # 7302  
Date 8-22-88

Customer Job # \_\_\_\_\_

Date	Job #	Description	Amount	Balance
<p>8-22-88</p> <p>RECEIVED AUG 24 1988</p> <p>10-27-88 250.00</p>	<p>P</p> <p>0888</p> <p>39</p>	<p>Previous Balance/Payment Received</p> <p>Print only:</p> <p>8 pg Tab "entire"</p> <p><del>for a winning ticket</del></p> <p>2,000 copies with</p> <p>color, half tone &amp;</p> <p>boxes</p> <p><b>PAID</b></p>	<p>44</p> <p>9.66</p> <p>(54.00)</p> <p>\$</p>	<p>44</p> <p>9.66</p>

Pay most recent invoice.

A carrying charge of 1½% will be applied to all amounts not paid within 30 days of invoice date.  
All collection expenses are recoverable.

PAY THIS AMOUNT

920409



**FREE THE EAGLE, INC.**  
 11244 WAPLES MILL ROAD,  
 FAIRFAX, VA 22030

THE GEORGE MASON BANK  
 FAIRFAX, VIRGINIA  
 88-444/500

CHECK NUMBER 6061

**PAY** THE SUM 1885 Dollars and 54 Cents 09-15-88

\*\*\*\*\*1,885.54

**PAID**  
 THE GEORGE MASON BANK  
 SEP 20 1988  
 FAIRFAX, VIRGINIA  
 644 505442232 09-20-88 004 00 0530

**TO THE ORDER** C&P TELEPHONE COMPANY  
 OF P.O. BOX 27709  
 RICHMOND, VA 23261--770

*Marilyn J. Price*

⑆00006061⑆+⑆05600445⑆ 002634 4⑆ ⑆0000188554⑆

92040922564

⑆0000188554⑆

0520-0027-8  
 0520-0027-8  
 05442232 09-20-88

2 091988 048 220260000368 018854 1575

PAID TO THE ORDER OF THE  
 C&P TELEPHONE COMPANY  
 RICHMOND, VA

19



**C&P Telephone**  
A Bell Atlantic Company

Acct: 202 638 0080 368 24

Aug 11 1988

Summary

Amount Past Due  
 \$1426.60 Last bill  
 -589.94 Payments  
 836.66 Balance overdue from last bill—please pay promptly

Current charges  
 517.98 C&P Telephone  
 1368.16 AT&T  
 \$1886.14 Subtotal Pay C&P by Aug 30

Page  
3-11  
12-33

**\$2722.20 Pay C&P Telephone**

Handwritten notes:  
 1,817.53  
 8101  
 5400  
 67.95  
 COPIED

**PAID**

220263800803680000 091209016100000836660000272220 01 6

92040922565





**C&P Telephone**

A Bell Atlantic Company

Acct 202 638 0080 368 24

Sep 11 1988

**Summary**

Amount Past Due  
 \$2722.20 Last bill  
 -836.66 Payments  
 1885.54 Balance overdue from last bill-please pay promptly

Current charges  
 354.37 C&P Telephone  
 1406.58 AT&T  
 9.71 NTL Telephone Svcs  
 \$1770.66 Subtotal Pay C&P by Sep 30

**\$3656.20 Pay C&P Telephone**

Page  
 2-10  
 11-44  
 45-46

**PAID**

Handwritten notes in a circle:  
 SHD  
 339.45  
 1431.21  
 Page 1

1,770

220263800803680000 101210046100001885540000365620 01 7

92040922567

DIAL 1 WATS SERVICE

CUSTOMER: 111477293  
INVOICE # 06 08 045582  
AUG 17, 1988 391526

PRIOR BALANCE ? IF PREVIOUSLY PAID, PLEASE DISREGARD.  
 CALL ACTIVITY THRU 08/13/88 1369 CALLS 3266.9 MINS  
 WATS USAGE 570.91  
 INTERNATIONAL 20.02  
 DIRECTORY ASSISTANCE USAGE 228.05  
 DIRECTORY ASSISTANCE CREDIT 1.20CR  
 NET USAGE TOTAL  
 FEDERAL EXCISE TAX (3% USAGE)  
 TELE-MANAGEMENT FEATURE CHARGES  
 FEATURES FEDERAL TAXES  
 WATS EQUIPMENT  
 CURRENT INVOICE TOTAL  
 TOTAL AMOUNT DUE

\$527.73

**PAID**

817.78  
 24.57  
 .00  
 1.74  
 88.20  
 902.28  
 -----  
 1430.02  
 .....

DUE AND PAYABLE TO US SPRINT, AT P.O. BOX 620099, DALLAS, TEXAS 75262-0099  
FOR CUSTOMER SERVICE, DIAL 1-800-877-4646.

Summertime is travel time! Whether it's business or pleasure don't forget to take US Sprint's FONCARD along. Use the premier travel card from hotels, airports or payphones to enjoy superior quality at the lowest overall rates!

*Handwritten:* \$101.40  
 \$99.57  
 \$420  
 COLLECTION



**FREE THE EAGLE, INC.**  
 11244 WAPLES MILL ROAD, SUITE J  
 FAIRFAX, VA 22030

**THE GEORGE MASON BANK**  
 FAIRFAX, VIRGINIA 22030  
 88-444/660

CHECK NUMBER 6216

9 2 0 4 0 9 2 2 5  
PAY

THE SUM 902 Dollars and 29 CENTS 10-07-88 \*\*\*\*\*902.29

TO THE ORDER OF U.S. SPRINT  
 P.O. BOX 620099  
 DALLAS, TX 75262-0099

*Marilyn J. Price*  
 #00006216# :058004445: 002634 4# #0000090229#

1114772930093208 10188000090229 US-149NFC

0520  
00108

07 88 12

PRIOR BALANCE ? IF PREVIOUSLY PAID. PLEASE DISREGARD.		\$1247.08
CALL ACTIVITY THRU 09/13/88	326 CALLS	947.4 MINS
WATS USAGE		172.40
INTERNATIONAL		3.36
DIRECTORY ASSISTANCE USAGE		48.00
DIRECTORY ASSISTANCE CREDIT		1.20CR
NET USAGE TOTAL		222.56
FEDERAL EXCISE TAX (3% USAGE)		6.68
TELEMANAGEMENT FEATURE CHARGES		1.00
FEATURES FEDERAL TAXES		1.78
WATS EQUIPMENT		59.55
CURRENT INVOICE TOTAL		290.87
TOTAL AMOUNT DUE		1527.65

DUE AND PAYABLE TO US SPRINT, AT P.O. BOX 620099, DALLAS, TEXAS 75262-0099  
FOR CUSTOMER SERVICE, DIAL 1-800-877-4646.

Catch all the Olympic action September 15-October 4 with US Sprint's "Olympics Hotline"! By dialing, toll-free, 1-800-USS-1988, you can hear the latest information on all the events throughout the Summer Olympic Games!

Handwritten note in a circle: 5400, 21.11, 11018, 11018, 11018

CHECK NUMBER 631

**FREE THE EAGLE, INC.**

1124 WAPLES MILK ROAD, SUITE 800  
FAIRFAX, VA 22030  
25 E Street, N.W., Suite 800  
Washington, D.C. 20001

THE GEORGE MASON BANK  
FAIRFAX, VIRGINIA 22030  
88-444/500

DATE 11147729330602971855

9  
2  
0  
4  
0  
9  
2  
2  
5  
6  
PAY

THE SUM 290 Dollars and 57 Cents

10-27-88

\*\*\*\*\*290.

TO THE ORDER OF

U.S. SPRINT  
P.O. BOX 620099  
DALLAS, TX 75262--0099

*James J. McNally*

⑆00006305⑆ ⑆05600445⑆ 002634 4⑆

⑆000002905

1 0 2 0 2 1 5 8 8 9 5 0 2 2 9 1 2 4

05 OCT 1988

1117729330602971855 11018000029057 USS-099MPC

NO 88 ON



**FREE THE EAGLE, INC.**  
 11244 WAPLES MILL ROAD, SUITE 100  
 FAIRFAX, VA 22030

THE GEORGE MASON BANK  
 FAIRFAX, VIRGINIA  
 88-444/580

CHECK NUMBER 5884

**PAID**  
 THE GEORGE MASON BANK  
**AUG 29 1988**  
 FAIRFAX, VIRGINIA

**PAY** One Thousand Four Hundred Eighty-Two Dollars and no/100 \$ 1,482.00

DATE 8-4-88

**TO THE ORDER OF** AmeriSystems  
 1100 Poydras Street  
 New Orleans, LA 70163

*Marilyn P. Price*

⑈00005884⑈ ⑆056004415⑆ 002634 4⑈ ⑈000148200⑈

92040922570

⑈026889960960002400013 90157484 240 97834⑈

Pay Any Bank, P.E.G.  
 M BANK  
 Credited to the Account of  
 the Within Named Payee  
 F. R. B. BALTIMORE, MD.  
 PAY ANY BANK  
 P.O. BOX 10082  
 BALTIMORE, MD. 21286  
 32-61

# FREE THE EAGLE

Date 7.4.88 Date Needed \_\_\_\_\_

MAKE PAYABLE TO: Amerisystems  
ADDRESS: 1100 Poydras Suite 800  
New Orleans, LA 70163

AMOUNT: \$ 1482.<sup>00</sup>

PURPOSE: for telephones for (dba) Coalition  
for a Winning Ticket at Republican  
National Convention. Contact - Janice Gaudett  
Suite # 1205 504-569-2021

REQUESTED BY: Howard Segermark

APPROVED BY: H.S. by telephone

DATE PAID: \_\_\_\_\_

CODE: \_\_\_\_\_

**PAID**

92040922571



**FREE THE EAGLE, INC.**  
 11244 WAPLES MILL ROAD, SUITE J  
 FAIRFAX, VA 22030

THE GEORGE MASON BANK  
 FAIRFAX, VIRGINIA  
 68-444/560

CHECK NUMBER

5890



DATE

1253.50

PAY

One thousand two hundred and no/1000

TO THE ORDER OF

The Letterhead Business Co.

*H. Segal*

⑈00005890⑈ +⑈056004445⑈ 002634 4⑈

⑈0000125350⑈

92040922572

*For deposit*

*Letterhead & Business*

*Card Co.*

*Acct # 480088*

⑈0000125350⑈  
 PAY ANY BANK  
 BALTIMORE MD 052000228  
 08-19-88 08-15-88  
 0500 0500  
 305000017

AG 88 16  
 FIRST N.C.  
 NEW ORLEANS, LA  
 NEW ORLEANS, LA



**FREE THE EAGLE, INC.**  
 11244 WAPLES MILL ROAD, SUITE 1  
 FAIRFAX, VA 22030

THE GEORGE MASON BANK  
 FAIRFAX, VIRGINIA 22030  
 68-444/580

CHECK  
 NUMBER

5894

PAY

One hundred fifty and no/100

DATE

8/5/88 \$ 150.00



TO THE  
 ORDER  
 OF

Tom Cox

*Marilyn J. Rice*

⑆00005894⑆ +⑆056004445⑆ 002634 4⑆

⑆0000015000⑆

7/20/80 40 224 573

8 5 8 0 2 6 8 2

AG 08

2-27 PAY ANY BANK P.E.G. 2-27  
 F.R.B. BALTIMORE MD 052000278  
 08-09-88 004 00 0801 208010215

# FREE THE EAGLE

Date 8-5-88 Date Needed \_\_\_\_\_

MAKE PAYABLE TO: Tom Cop

ADDRESS: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

AMOUNT: \$ 150.<sup>00</sup>

PURPOSE: Travel advance for Republican National Convention.

REQUESTED BY: H.S.

APPROVED BY: \_\_\_\_\_

**PAID**

DATE PAID: \_\_\_\_\_

CODE: \_\_\_\_\_

92040922574



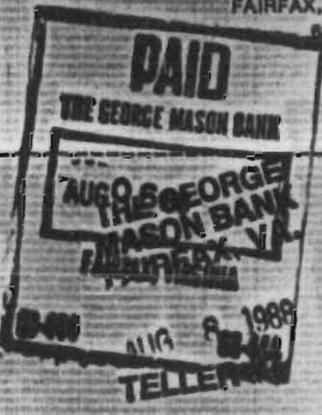
**FREE THE EAGLE, INC.**  
 11244 WAPLES MILL ROAD, SUITE J  
 FAIRFAX, VA 22030

THE GEORGE MASON BANK  
 FAIRFAX, VIRGINIA 22030  
 88-444/580

CHECK  
 NUMBER

5895

PAY One hundred fifty and no/100 DATE 8/5/88 \$ 150.00



TO THE ORDER OF John H. Smith, Jr.

*Marilyn J. [Signature]*

⑈00005895⑈ +⑈056004445⑈ 002634 4⑈

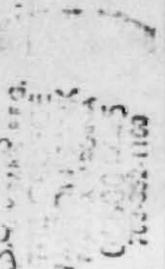
⑈000015000⑈

92040922575

*John H. Smith Jr.*

*150 DL  
 8223-66-3416-000*

*9-30-85*



AUG - 5 88

# FREE THE EAGLE

Date 7-5-88 Date Needed \_\_\_\_\_

MAKE PAYABLE TO: John Smith, Jr.

ADDRESS: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

AMOUNT: \$ 150.00

PURPOSE: Travel advance for Republican National Convention

REQUESTED BY: V. S.

APPROVED BY: \_\_\_\_\_

DATE PAID: \_\_\_\_\_

CODE: \_\_\_\_\_

92040922576

**PAID**

FREE THE EAGLE, INC.  
11244 WAPLES MILL ROAD, SUITE J  
FAIRFAX, VA 22030

THE GEORGE MASON BANK  
FAIRFAX, VIRGINIA  
68-444/580

CHECK  
NUMBER

5969

PAY

THE SUM 114 Dollars and 76 Cents

PAID  
THE GEORGE MASON BANK  
DATE  
SEP 21 88

08-25-88

\*\*\*\*\*114.76

201763389 09-20-88 002 00 0170  
FAIRFAX, VIRGINIA

TO THE  
ORDER  
OF

JANICE C. FARNSWORTH  
2637 WOODLEY PLACE, N.W.  
WASHINGTON, D.C. 20008

*Marilyn Price*

⑆00005969⑆ +⑆056004445⑆ 002634 4⑆

⑆000011476⑆

*Janice C. Farnsworth  
2637 Woodley Pl  
20786*

*See Page 2*

▶ 254074345 4  
W.P. CONGRESSIONAL FCU  
WASHINGTON DC 20515  
001  
SEP 20 88 005

09-20-88 685592702  
201763389 8-22-88

# FREE THE EAGLE

## MISCELLANEOUS EXPENSE VOUCHER

6/18 - 8/12/88  
 Period Covered (Dates)

J. Farnsworth  
 Name

TRANSPORTATION			Taxi	Tolls & Parking	No. of Miles	Amount	Other (Explain)	Receipt Attached
Date	To - From	Purpose of Trip			at	.21/mile		

RECEIVED AUG 15 1988

PAID

MEALS & ENTERTAINMENT					
Date	Location	# in Party	Business Purpose, Persons Entertained, Company, Title	Amount	Receipt Attached
6/18	Cap. Hill Club	3	Pres Recept. D. York, Cong. Bunning, B. Strought, Postmaster	38.57	✓
7/22	La Colline	2	S. Scott, Rep. Conv. - FIE Recept.	49.59	✓
7/27	Hunan	5	staff lunch re coal. for winning ticket	26.80	✓
6530				5400	

MISCELLANEOUS			
Date	Explanation	Amount	Receipt Attached

SUMMARY	
Transportation	
Meals & Entertainment	114.76
Miscellaneous	
<b>TOTAL EXPENSES</b>	

Cash Advance	
Total Expenses	114.76
Due to FIE	<del>114.76</del>
Due from FIE	114.76

J. Farnsworth  
 Approved by

Date Paid: 9 2 0 4 0 9 2 6 0 7 0 2 6



**FREE THE EAGLE, INC.**

11264 WAPLES MILL ROAD, SUITE 100

FAIRFAX, VA 22030 XXXXXXXXXX

25 E Street, N.W., Suite 800

Washington, D.C. 20001

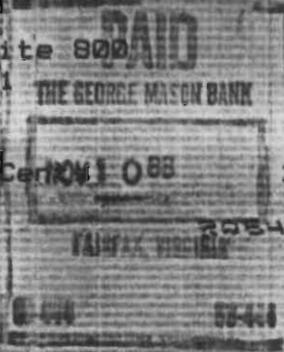
THE GEORGE MASON BANK

FAIRFAX, VIRGINIA 22031

68-444/560

CHECK NUMBER

6266



DATE

10-19-88

056001079

\*\*\*\*\*291.00

205421598 11-10-88 004 00 0530

PAY

THE SUM 291 Dollars and 00 Cents

TO THE ORDER

OF WESTPARK TRAVEL  
214 MASS AVE, NE, STE #490  
WASHINGTON, DC 20002

*Marilyn Price*

⑆00006266⑆ + ⑆056004445⑆ 002634 4⑆

⑆0000029100⑆

92040922579

0520-0027-8

0520-0027-8  
0520-0027-8  
205421598 11-10-88

056001079

NO 88 09



FREE THE EAGLE, INC.

NEW MARKET MILLS ROAD, SUITE 800  
FAIRFAX, VA 22030 XXXXXXXXXX

25 E Street, N.W., Suite 800  
Washington, D.C. 20001

THE GEORGE MASON BANK  
FAIRFAX, VIRGINIA  
68-444/500

DATE

PAY

THE SUM 291 Dollars and 00 Cents

10-19-88

\*\*\*\*\*291.00

*copy*

TO THE ORDER

OF WESTPARK TRAVEL  
214 MASS AVE, NE, STE #490  
WASHINGTON, DC 20002

NOT NEGOTIABLE

⑆00006266⑆ ⑆056004445⑆ 002634 ⑆⑆

DATE	DOCUMENT DESCRIPTION	ACCOUNT #	AMOUNT	DISC	NET
10-05-88	26303 CREDIT ON INV.	6500.	-285.00	0.00	-285.00
08-05-88	0014219 JOHN SMITH - N	6500.	288.00	0.00	288.00
08-05-88	0014220 TOM COX - NEW	6500.	288.00	0.00	288.00

*These two tickets paid with this check.  
Balance after using a credit on another ticket was 291.00*

920409225

# WESTPARK TRAVEL - CAPITOL HILL

214 MASSACHUSETTS AVENUE, N.E. • SUITE 490 • WASHINGTON, D.C. 20002 • (202) 544-8202

## INVOICE

SALES PERSON: 43 ITINERARY/INVOICE NO. 0014220 DATE: 05 AUG 88  
 CUSTOMER NBR: 024619 SVENDS

TO: FREE THE EAGLE  
 25 L ST NW 8TH FLOOR  
 WASH DC 20001

THANK YOU FOR FAVORING US WITH YOUR TRAVEL BUSINESS. WE MUST PAY THE AIRLINE EACH WEEK FOR ALL TICKETS ISSUED. WE WILL APPRECIATE RECEIVING PAYMENT FOR YOUR TICKETS PROMPTLY.  
 PLEASE PRINT FROM THIS INVOICE.

AIR: COX/TOM

07	AUG 88	-	SUNDAY					
	AIR	LV	WASHINGTON NATL	822A	AMERICAN	FLT:1427	SPCL COACH	
		AR	NASHVILLE	909A	NON-STOP	BREAKFAST		
1			RESERVED SEATS	17C				
5	AIR	LV	NASHVILLE	955A	AMERICAN	FLT:1333	SPCL COACH	
8		AR	NEW ORLEANS	1127A	NON-STOP			
			RESERVED SEATS	28F				
2	AUG 88	-	THURSDAY					
	AIR	LV	NEW ORLEANS	750A	CONTINENTAL	FLT:1252	ECONOMY	
		AR	WASHINGTON NATL	1111A	NON-STOP	BREAKFAST		
			RESERVED SEATS	17F				
9								
2								
0	TICKET/S		AA7037483638		FOR COX TOM			288.00
4								-----
0					SUB TOTAL			288.00
2								-----
					TOTAL AMOUNT			288.00

TWENTY FIVE PERCENT OF FARE IS NONREFUNDABLE IF  
 RESERVATION IS CHANGED OR CANCELLED ONCE TICKETED

6500



**FEDERAL EXPRESS**

5400

BILL TO: FREE THE EAGLE  
25 E STREET NW 8TH  
WASHINGTON, DC 20001

**RECIPIENT ACTIVITY SUMMARY**

INVOICE NO. 6-575-22746 ACCOUNT NO. 1070-7720-0  
PAGE 1 OF 1  
DATE 09/20/88

TRACKING NOS REFERENCE	SENDER'S NAME AND ACCOUNT ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
7097731476	CATHY LEE LINCOLN PROPERTY COMPANY 1100 POYDRASS SUITE 800 NEW ORLEANS, LA 70163	SONNY SCOTT FREE THE EAGLE 25 E STREET NW 8TH WASHINGTON, DC 20001 AA DELIVERED 09/19/88 11:00 SIGNED: L.PERRY	1/ 5	STANDARD AIR DISCOUNT	18.50 -3.00	
5774439	1 DROP OFF 09/16/88					12.50
7097731480	CATHY LEE LINCOLN PROPERTY COMPANY 1100 POYDRASS STE 800 NEW ORLEANS, LA 70163	SONNY SCOTT FREE THE EAGLE 25 E STREET NW 8TH WASHINGTON, DC 20001 AA DELIVERED 09/19/88 11:00 SIGNED: L.PERRY	1/ 5	STANDARD AIR DISCOUNT	18.50 -3.00	
5423796	1 DROP OFF 09/16/88					12.50
RECIPIENT SUBTOTAL			25.00	PAY THIS AMOUNT		25.00

RECEIVED OCT 4 1988

FEC-M-145 8/84

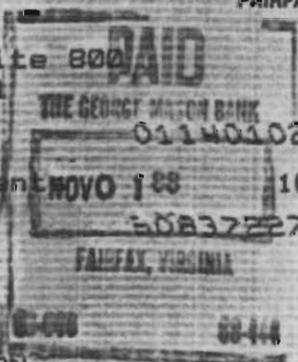
9204 OF ORDER TO THE RAY

**FREE THE EAGLE, INC.**

11244 WAPLEB MILK ROAD, SUITE B-K  
FAIRFAX, VA X 22030 XXXXXXXXXXXX  
25 E Street, N.W., Suite 800  
Washington, D.C. 20001

THE GEORGE MASON BANK  
FAIRFAX, VIRGINIA 22030  
68-444/500

CHECK NUMBER 6285



THE SUM 92 Dollars and 00 Cent  
FEDERAL EXPRESS CORPORATION  
P.O. BOX 1140 DEPT. A  
MEMPHIS, TN 38101--114

DATE 10-27-88  
011401022 03 0088553 10-31-88 3  
NOVO 188 10-27-88 \*\*\*\*\*92.00  
608372275 11-01-88 004 00 0825

*Stanley McRally*

⑈00006289⑈ + ⑈056004445⑈ 002634 4⑈ ⑈0000009200⑈

081000084  
FEDERAL EXPRESS, INC.  
MEMPHIS, TN  
610-086558

0820-0027-5  
0520-0022-5  
0820-0022-5  
011401022 10-31-88



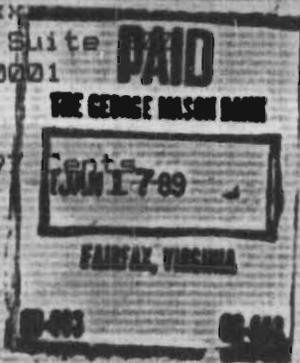
**FREE THE EAGLE. IN**  
 11244 WARNER MILK ROAD, SW  
 FAIRFAX, VA 22030  
 25 E Street, N.W., Suite  
 Washington, D.C. 20001

THE GEORGE MASON BANK  
 FAIRFAX, VIRGINIA 22030  
 88-444/580

CHECK NUMBER  
**6553**

**PAY**

THE SUM 149 Dollars and 97



DATE

01-06-89

\*\*\*\*\*149.97

**TO THE ORDER**

**OF** JOHN H. SMITH, JR.  
 10905 WOODHAVEN DRIVE  
 FAIRFAX, VA 22033

*Marilyn Price*

⑈00006553⑈ + ⑆056004445⑆ 002634 4⑈ ⑆0000014997⑆

92040922584

*John H. Smith Jr*

THE GEORGE MASON BANK  
 FAIRFAX VA  
 708-352-1100  
 056004445

01/07/89



**FREE THE EAGLE, INC.**  
 11244 WAPLES MILL ROAD, SUITE J  
 FAIRFAX, VA 22030  
 25 E Street, N.W., Suite 800  
 Washington, D.C. 20001

**THE GEORGE MASON BANK**  
 FAIRFAX, VIRGINIA 22030  
 68-444/600

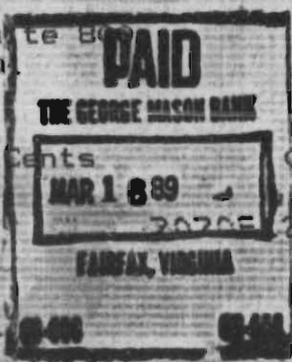
CHECK NUMBER **6840**

**PAY**

THE SUM 281 Dollars and 73 Cents

DATE 03-14-89

\*\*\*\*\*281.73



**TO THE ORDER OF**

HYATT REGENCY CRYSTAL CITY  
 2799 JEFFERSON DAVIS HWY  
 ARLINGTON, VA 22202

*Marilyn J. Price*

⑆00006840⑆ +⑆056004445⑆ 002634 4⑆

⑆000028173⑆

92040922585

⑆000028173⑆

0520-0027-B  
 0520-0027-B  
 0520-0027-B  
 03-14-89

HYATT REGENCY  CRYSTAL CITY

STATEMENT

AT WASHINGTON NATIONAL AIRPORT

2799 JEFFERSON DAVIS HIGHWAY  
ARLINGTON, VIRGINIA 22202 USA  
703-486-1234

Payment shall be made immediately upon receipt of statement.

CUMITTEE FOR THE WINNING TICKET  
C/O FREE THE EAGLE  
25 E ST., N.W.  
8TH FLOOR  
WASHINGTON, D.C. 20001

REMIT TO:  
HYATT REGENCY CRYSTAL CITY  
1970 CHAIN BRIDGE ROAD  
MC LEAN, VA 22109-0200

AMOUNT ENCLOSED \_\_\_\_\_

REFERENCE X-007906

DATE 10-01-88

PLEASE RETURN THIS SECTION WITH YOUR REMITTANCE - THANK YOU

REFERENCE	DATE	CODE	DESCRIPTION	DEBITS	CREDITS	AMOUNT DUE
04092258	072588	CS	COFFEE SERVICE	63.58		
	072588	L	LUNCHEON	308.65		
	072588	RR	ROOM RENTAL	109.50		
	072588	PA	PAYMENT - THANKYOU!		260.00	
			HYATT REGENCY  CRYSTAL CITY			

*PAID*  
*Coalition Expenses*  
*65.00*

ACCOUNT NUMBER

x-007906

BILLING DATE

10-01-88

BALANCE DUE

281.73

YOUR PAYMENT IS PAST DUE--- PLEASE CALL (703) 486-1234 EXT. 6168  
AIRPORT PLAZA ASSOCIATES D/R/A H.R. CRYSTAL CITY TAX ID #52-1215394

60 DAYS OLD 281.73

DATE	ACCOUNT NO.	PHONE NO.
	X-7906	
SIGNATURE X		



**FREE THE EAGLE, INC.**  
 11244 WAPLES MILL ROAD,  
 FAIRFAX, VA 22030

THE GEORGE MASON BANK  
 FAIRFAX, VIRGINIA 22030  
 88-444/560

CHECK NUMBER

5883

PAY One Thousand Four Hundred Dollars and 00/100

\$ 1,400.00

DATE 8-4-88

08-16-88 1,400.00 0705 607290559



TO THE ORDER OF

LINCOLN PROPERTY MANAGER

*Shirley Price*

⑆00005883⑆ +⑆056004445⑆ 002634 4⑆

⑆000410000⑆

9 2 0 4 0 9 2 2 5 8 7

Lincoln Property Co.  
 Manager



**HIBERNIA**  
 National Bank  
 New Orleans, Louisiana 70181  
**FOR DEPOSIT ONLY**  
**LOYOLA ASSOCIATES**  
**OPERATING ACCOUNT**  
 025224721

08-15-88 004 00 0705 607290559

AG 88 12  
 THE BANK OF AMERICA  
 100 NORTH CO. ST. E.  
 DALLAS, TEXAS 75202

AG 88 11  
 HIBERNIA NAT'L BANK  
 NEW ORLEANS, LA  
 12-9

# FREE THE EAGLE

Date 8-4-88 Date Needed 8-4-88

MAKE PAYABLE TO: LINCOLN PROPERTY MANAGEMENT

ADDRESS: 1100 Poydras Street  
New Orleans, Louisiana 70163

**PAID**

AMOUNT: \$ 1,400<sup>00</sup>

PURPOSE: Rent for 1/2 of suite #1205 for FTE dba  
"Committee for a Winning Ticket" at Republican  
National Convention in New Orleans  
Contact: Mr. Tommy Crane, 504-569-2000

REQUESTED BY: Howard Segersmark

APPROVED BY: H.S. by telephone

DATE PAID: \_\_\_\_\_

CODE: \_\_\_\_\_

92040922588

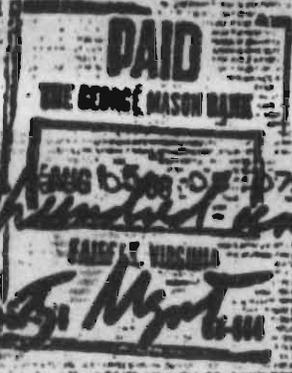


**FREE THE EAGLE, INC.**  
 11244 WAPLES MILL ROAD, SUITE  
 FAIRFAX, VA 22030

**THE GEORGE MASON BANK**  
 FAIRFAX, VIRGINIA 22030  
 68-444/880

CHECK NUMBER **5891**

PAY



**1400.00**

*Fourteen hundred and no/100 dollars*

TO THE ORDER OF

*Lincoln Property Mgmt*

*H. Sykes*

⑆00005891⑆ ⑆05600445⑆ 002634 4⑆ ⑆000014000⑆

Lincoln Property Co. 2 5 8 9  
 Manager 4 0 9

**HISERNIA**  
 National Bank  
 New Orleans, Louisiana 70161  
 FOR DEPOSIT ONLY  
 LOYOLA ASSOCIATES  
 OPERATING ACCOUNT  
 72529721

AG 88 12  
 ANY BANK, BRANCH  
 OR TRUST CO. P.O.  
 BEAL COMMERCIAL BANK  
 2805 DALLAS, TEXAS 32-115  
 08-15-88 004100 0205 507290550  
 P. R. B. BATTLE BANK OF 5205 5 2-87  
 NEW ORLEANS LA  
 HISERNIA NAT. BANK  
 PAY ANY BANK P.O.



**FREE THE EAGLE, INC.**

11244 WAPLES MILL ROAD, SUITE 800  
FAIRFAX, VA 22030  
XXXXXXXXXXXXXXXXXXXX

25 E Street, N.W., Suite 800  
Washington, D.C. 20001

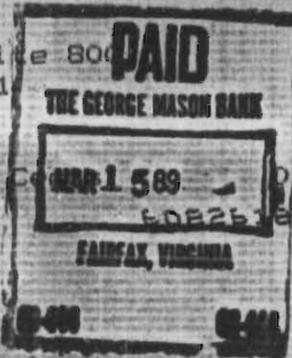
THE GEORGE MASON BANK  
FAIRFAX, VIRGINIA  
68-444/560

CHECK  
NUMBER

6641

PAY

THE SUM 1052 Dollars and 97 Cents



DATE

\$

MAR 15 89

01-25-89

\*\*\*\*\*1,052.97

608261842 03-15-89 004 00 0720

TO THE  
ORDER

OF CAPITOL HILL CLUB  
300 FIRST STREET, S.E.  
WASHINGTON, DC 20003

*Marilyn J. Rice*

⑈00006641⑈+⑈056004445⑈ 002634 ⑈ # 65489 ⑈0000105297⑈

9 2 0 FOR DEPOSIT ONLY 5 9 0  
NATIONAL REPUBLICAN CLUB  
OF CAPITOL HILL

MAR 13 1989

(T/A CAPITOL HILL CLUB)  
NBW ACCT. # 2-715-208

0580-0027-B  
0580-0027-B  
608261842 03-15-89

21 081 801 3

DATE	CODE	CHARGE DESCRIPTION	CHIT	M - MIN	AMOUNT (CREDIT)	SERVICE CHG	TAX	TOTAL
09-21-88	901	Bal Fwd - H			314.73			314.73
09-23-88	901	HOUSE PAYMENT			171.69			171.69
09-30-88	014	HOUSE PAYMENT			143.04			143.04
09-30-88	014	Reciprocal Clubs			1,052.97			1,052.97
10-01-88	MA	Assoc. Dues Monthly			45.00			45.00
Total - House					1,097.97	0.00	0.00	1,097.97
Pay This Amount								1,097.97

*65.30*  
*1,052.97*  
*65.30*  
*1,052.97*  
*65.30*  
*1,052.97*  
**PAID**

22591  
 05434

CHARGES STAND CORRECT UNLESS INQUIRY IS MADE BY OCT. 24TH, 1988  
 MR HOWARD SEGERMARK      09/30/88

0.00	0.00	0.00	DUES & OTHERS PAYMENTS TO CHC ARE NOT DEDUCTIBLE AS CHARITABLE CONTRIBUTION FOR FEDERAL INCOME TAX PURPOSES	DUES TOTAL	DUES PAID TO DATE	DUES BALANCE
30-60 DAYS	60-90 DAYS	OVER 90 DAYS				

**THE CAPITOL HILL CLUB**      (202)-484-4590



**FREE THE EAGLE, INC.**  
 11244 WAPLES MILL ROAD, SUITE 100  
 FAIRFAX, VA 22030

**THE GEORGE MASON BANK**  
 FAIRFAX, VIRGINIA  
 88-444/580

CHECK NUMBER **6060**



**PAY**

THE SUM 1000 Dollars and 00 Cents

DATE 09-15-88

\*\*\*\*\*1,000.00

**TO THE ORDER**

**OF BANK CARD CENTER**  
 P.O. BOX 26272  
 RICHMOND, VA 23260--627

*Marilyn J. Price*

4368 0001 0597 1939

⑈00006060⑈+⑈05600445⑈002634 4⑈ ⑈0000100000⑈

92040922592

# 51927219 # 51927219

GOVARN BANK, N.A. (DC) 0510  
 1111 EAST MAIN STREET 00017  
 RICHMOND, VIRGINIA 788-2010

SE 88 16 066007387

GOVARN BANK NA  
 GOVARN BANK/DE  
 051000017  
 1111 E Main St-BCC  
 Richmond, Va.  
 (804) 788-2010

\*08510 229 07 4368000105971939 091688 138 07932

4368 0001 0597 1939

436800010597193900010400003527627

FREE THE EAGLE-H SEGERMARK  
11244 WAPLES HILL RD SUITE J  
FAIRFAX VA 22030-6040

New Balance		Closing Date	Payment Due Date
\$3,527.62		09-01-88	09-26-88
Please indicate amount of payment for this Account \$	Current Amount Due		The Current Amount Due is payable by the Payment Due Date.
	\$104.00		
		Past Due Amount	The Past Due Amount is due immediately.

To avoid additional FINANCE CHARGES being applied to your current purchases on next month's statement, pay the New Balance in full by the Payment Due Date.

Indicate any change of address above.

Please tear here and return this coupon with your payment payable to BANK CARD CENTER.

**VISA**

STATEMENT  
PLEASE SEND INQUIRIES TO  
BANK CARD CENTER  
P O BOX 930  
NORFOLK VA 23501

Account Number	Statement Closing Date	Credit Limit	Available Credit	Page
4368 0001 0597 1939	09-01-88	4500	572	1 of

CALL - IN TIDEWATER VA 804-858-4500  
TOLL FREE WITHIN VA 800-582-8375  
TOLL FREE OUTSIDE VA 800-446-8261  
FOR LOST OR STOLEN CARDS 800-541-5040

Type of Transaction	Date		Description Of Transaction	Amount	Billing Item Number
	Month	Day			
PREV BALANCE			PREVIOUS BALANCE FROM LAST STATEMENT	543.41	
RETAIL PURCHASE	07	03	YELLOW CAB CINTI OH	23.50	74385568224015006690345 12
RETAIL PURCHASE	07	28	A V RISTORANTE ITALIAN WASHINGTON DC	213.41	74313018215651294162534 05
RETAIL PURCHASE	07	29	EASTERN METER CO ARLINGTON VA	30.00	7431820821501217020187 05
RETAIL PURCHASE	08	01	BELLEVUE HOTEL WASHINGTON DC	32.49	7431820821701218132543700
RETAIL PURCHASE	08	01	LA COLLINE WASHINGTON DC	259.78	74368008223000001218986 11
RETAIL PURCHASE	08	03	ESPLANADE MGMT LTD NEW ORLEANS LA	1,500.00	74625078235000025094007 23
RETAIL PURCHASE	08	07	KOLBS RESTAURANT INC NEW ORLEANS LA	61.30	7462507822000329103228 10
RETAIL PURCHASE	08	08	21 FEDERAL WASHINGTON DC	242.50	7436800822000001323019 09
RETAIL PURCHASE	08	09	TRICOU HOUSE NEW ORLEANS LA	68.03	74625078238000525203626 16
RETAIL PURCHASE	08	11	HAOGANY HALL NEW ORLEANS LA	96.90	74625078228000386601311 16
RETAIL PURCHASE	08	12	HOTEL INTERCONTINEN- NEW ORLEANS LA	11.36	74625078231000435601361719
RETAIL PURCHASE	08	12	VAL DE LOIRE REST NEW ORLEANS LA	102.90	74625078239000405801441717
RETAIL PURCHASE	08	14	HOTEL INTERCONTINEN- NEW ORLEANS LA	28.47	74625078231600435601379719
RETAIL PURCHASE	08	14	HOTEL INTERCONTINEN- NEW ORLEANS LA	252.00	74625078231000435601379719
RETAIL PURCHASE	08	20	HAMPTON'S HALLMARK NEW ORLEANS LA	114.48	74839008237000236119368 25
FINANCE CHARGE	09	01	FINANCE CHARGE - OTHER EXTENSIONS	47.09	01
NEW BALANCE			***** NEW BALANCE *****	3,527.62	
			MINIMUM PAYMENT DUE	104.00	

Type Of Credit	Periodic Rate(s)	Corresponding Nominal Annual Percentage Rate(s)	Balance On Which FINANCE CHARGE Was Computed	FINANCE CHARGE From Application Of Periodic Rate(s)	To Avoid Additional Finance Charges On Goods & Services Pay The New Balance In Full By	5-005934 PERCENTAGE For This
Cash Advances	1.0000 %	12.000 %	0.00	0.00	09-26-88	100000000000
Extensions Of Credit For Goods & Services	1.5000 %	18.000 %	3139.28	47.09		100000000000
CASH ADVANCE *ANNUAL PERCENTAGE RATE*		12.000 %	GOODS & SERVICES *ANNUAL PERCENTAGE RATE*		18.000 %	100000000000

NOTICE: Send Payments To: BANK CARD CENTER  
Post Office Box 26272  
Richmond, VA 23260-6272

Payments received at this address prior to 6 a.m. each banking day will be credited as of that date. If you have disputed any amount on your statement by sending a billing error notice, you need not pay the amount in dispute.



FREE THE EAGLE, INC.

11244 MAPLES WOOD ROAD  
FAIRFAX, VA 22030

P.O. Box 1330

THE GEORGE MASON BANK  
FAIRFAX, VIRGINIA  
88-444/560

CHECK  
NUMBER

6269

PAID  
THE GEORGE MASON BANK  
OCT 24 88  
FAIRFAX, VIRGINIA

DATE 10-20-88

PAY One Thousand Dollars and no/100

1,000.00

TO THE  
ORDER  
OF

BANK CARD CENTER

*Marilyn Reese*

#4368-0001-0597-1939

⑆00006269⑆ + ⑆056004445⑆ 002634 4⑆

⑆0000100000⑆

92040922594

1129972  
SOVERAN BANK, N.A. (804)  
1111 EAST MAIN STREET  
RICHMOND, VIRGINIA  
788-2010

0510  
00017  
01 88 21  
066007387

SOVERAN BANK  
05100017  
1111 E Main Street  
Richmond, VA  
(804) 788-2010

0811 079 03 4388001009/1937 102186 582 00102

BANK CARD CENTER

4368 0001 0597 1939

436800010597193900012500004248228

FREE THE EAGLE-H SEGERMARK  
11244 WAPLES MILL RD SUITE J  
FAIRFAX VA 22030-6040

New Balance		Closing Date	Payment Due Date
\$4,248.22		10-03-88	10-28-88
Please indicate amount of payment for this Account	Current Amount Due		The Current Amount Due is payable by the Payment Due Date
	\$125.00		
Past Due Amount		The Past Due Amount is due immediately.	

To avoid additional FINANCE CHARGES being applied to your current purchases on next month's statement, pay the New Balance in full by the Payment Due Date.

Indicate any change of address above.

Please tear here and return this coupon with your payment payable to BANK CARD CENTER.

**VISA**

STATEMENT

PLEASE SEND INQUIRIES TO  
BANK CARD CENTER  
P O BOX 930  
NORFOLK VA 23501

CALL - IN TIDEWATER VA 804-858-4500  
TOLL FREE WITHIN VA 800-582-8375  
TOLL FREE OUTSIDE VA 800-446-8261  
FOR LOST OR STOLEN CARDS 800-541-5040

Account Number	Statement Closing Date	Credit Limit	Available Credit	Page
4368 0001 0597 1939	10-03-88	4500	136	1

Type Of Transaction	Date		Description Of Transaction	Amount	Billing Item Number
	Month	Day			
PREV BALANCE			PREVIOUS BALANCE FROM LAST STATEMENT	3,527.62	
RETAIL PURCHASE	08	26	BELLEVUE HOTEL WASHINGTON DC	24.33	74318208244011245036490702
RETAIL PURCHASE	08	29	HENRY AFRICA ALEXANDRIA VA	16.15	74318208244011245006410702
RETAIL PURCHASE	08	29	BUDGET RENT A CAR FT LAUDERDALEFL	390.50	74625078251000651504225 08
RETAIL PURCHASE	09	03	DISTRICT LOCK N HARDWA WASHINGTON DC	85.00	74127008256112024092751 13
RETAIL PURCHASE	09	12	DELTA 00000816 ATLANTA GA	320.00	74399008257155945629946714
PAYMENT	09	16	PAYMENT RECEIVED - THANK YOU	1,000.00	74368078260018510079324 16
RETAIL PURCHASE	09	16	THE MARK HOPKINS INTER SAN FRANCISCOCA	27.98	74070008263230919166049720
RETAIL PURCHASE	09	16	THE BLUE FOX SAN FRANCISCOCA	222.23	74301178264952280000322721
RETAIL PURCHASE	09	18	HILTON SAN FRAN N THRS SAN FRANCISCOCA	11.25	74127008271127038228350728
RETAIL PURCHASE	09	19	HILTON SAN FRAN N THRS SAN FRANCISCOCA	543.12	74127008271127038232036728
RETAIL PURCHASE	09	26	BELLEVUE HOTEL WASHINGTON DC	18.48	74318208273011274160023703
FINANCE CHARGE	10	03	FINANCE CHARGE - OTHER EXTENSIONS	61.56	03
NEW BALANCE			***** NEW BALANCE *****	4,248.22	
			MINIMUM PAYMENT DUE	125.00	

1720.60

Type Of Credit	Periodic Rate(s)	Annual Percentage Rate	Balance On Which FINANCE CHARGE Was Computed	FINANCE CHARGE From Application Of Periodic Rate(s)	To Avoid Additional Finance Charges On Goods & Services Pay The New Balance In Full By
Cash Advances	1.5000%	18.000%	0.00	0.00	10-28-88
Extensions Of Credit For Goods & Services	1.5000%	18.000%	4104.01	61.56	XXXXXXXXXX

CASH ADVANCE \*\*ANNUAL PERCENTAGE RATE\*\* 18.000% \* GOODS & SERVICES \*\*ANNUAL PERCENTAGE RATE\*\* 18.000%

NOTICE: Send Payments To: BANK CARD CENTER  
Post Office Box 26272  
Richmond, VA 23260-6272

Payments received at this address prior to 6 a.m. each banking day will be credited as of that date. If you have disputed any amount on your statement by sending a billing error notice, you need not pay the amount in dispute.

# A WINNING TICKET!

BUSH/A CONSERVATIVE RUNNING MATE

Admit two to the White House

A WINNING TICKET!

Admit 2 to the White House

11-8-88

11-8-88

- GRASSROOTS SUPPORT
- 25 NATIONAL CONSERVATIVE ORGANIZATIONS
- OVER 100 CONSERVATIVE LEADERS

1100 Poydras Street, Suite 1205, New Orleans, LA 70167  
Telephone (504) 582-2252 Telefax (504) 582-2251

BUSH

A WINNING TICKET!  
A CONSERVATIVE  
RUNNING MATE

92040922596



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 7, 1990

Alan P. Dye, Esquire  
Webster, Chamberlain & Bean  
1747 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

RE: MUR 2810  
Coalition for a Winning  
Ticket ("CWT") and  
Howard Segermark,  
as treasurer

Dear Mr. Dye:

Allow me to apologize on behalf of this Office for our delay in attending to this matter. Unfortunately, Robert Raich, the attorney assigned to this MUR, has left the Commission with the matter being reassigned to Jose M. Rodriguez, another attorney with this Office. We have your submissions of March 1, 1989 and August 7, 1989. Upon review, it appears that several issues require clarification or additional information.

First, missing from the copies provided of CWT's bank records was a bank statement for the month of April, 1989. Please provide us with a copy of this statement.

Second, while copies of all checks written by FTE for the benefit of CWT were provided, we found no documentation showing any transfer of funds directly to CWT from FTE as testified to by Mr. Segermark. Please provide us with a list of all funds transferred from FTE to CWT for the period of August 1, 1988 through June 30, 1989, including the date and amount of each transfer. In addition, please provide documentation of CWT's repayment to FTE of these amounts.

Third, in your August 7, 1989 response you denied our request for a list of all CWT contributors based on their rights under the first amendment. While we do not accept this argument, we now require only a list, including date and amount, of those contributions made by CWT member organizations identified in your March 1, 1989, response.

Fourth, in response to our subpoena you made mention of a third "thank you" letter sent out by Sen. Humphrey. However, a copy of this letter was never provided. Please provide us with a copy of this letter.

92040922597

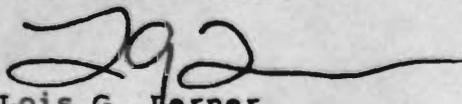
Alan P. Dye, Esquire  
Page Two

Fifth, as part of exhibit "B" to your March 1, 1989, response you provided us with a breakdown of the costs for the preparation of the solicitation letter. The first portion of this breakdown related to costs incurred from CMB International Corp. ("CMB") totaling \$1,861.68. In your August 7, 1989, response you provided us with a receipt from CMB to CWT totaling \$5,595.18. Please clarify which portion of the bill went towards the mailing, what the balance relates to, and what allocation method was employed to separate the costs.

We would appreciate your prompt response to these questions to enable us now to expeditiously proceed with this matter. If you have any questions, please contact Jose M. Rodriguez, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

  
BY: Lois G. Berner  
Associate General Counsel

92040922598

OGC 9880

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

LAW OFFICES  
**WEBSTER, CHAMBERLAIN & BEAN**  
1747 PENNSYLVANIA AVENUE, N. W.  
WASHINGTON, D. C. 20006  
(202) 785-9500  
FAX: (202) 895-0243

91 JAN 22 AM 10:57

GEORGE D. WEBSTER  
J. COLEMAN BEAN  
ARTHUR L. HEROLD  
ALAN P. DYE  
EDWARD D. COLEMAN  
BURKETT VAN KIRK  
FRANK M. NORTHAM  
GERARD P. PANARO  
JOHN W. HAZARD, JR.  
CHARLES M. WATKINS  
HUGH K. WEBSTER  
ANNE B. POPE

OF COUNSEL  
CHARLES E. CHAMBERLAIN

January 18, 1991

Mr. John Burnstein  
Office of the General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: MUR 2810  
Coalition for a Winning  
Ticket and Howard  
Segemark

Dear Mr. Burnstein:

Enclosed are the responses and materials you requested concerning the above-referenced matter. These are in response to the December 7, 1990 letter from the Federal Election Commission. Please let me know if you need anything further.

Sincerely,

*Alan P. Dye*  
Alan P. Dye

91 JAN 22 PM 3:46

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL

92040922599



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 7, 1990

Alan P. Dye, Esquire  
Webster, Chamberlain & Bean  
1747 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

RE: NUR 2810  
Coalition for a Winning  
Ticket ("CWT") and  
Howard Segermark,  
as treasurer

Dear Mr. Dye:

Allow me to apologize on behalf of this Office for our delay in attending to this matter. Unfortunately, Robert Raich, the attorney assigned to this NUR, has left the Commission with the matter being reassigned to Jose M. Rodriguez, another attorney with this Office. We have your submissions of March 1, 1989 and August 7, 1989. Upon review, it appears that several issues require clarification or additional information.

First, missing from the copies provided of CWT's bank records was a bank statement for the month of April, 1989. Please provide us with a copy of this statement.

Second, while copies of all checks written by FTE for the benefit of CWT were provided, we found no documentation showing any transfer of funds directly to CWT from FTE as testified to by Mr. Segermark. Please provide us with a list of all funds transferred from FTE to CWT for the period of August 1, 1988 through June 30, 1989, including the date and amount of each transfer. In addition, please provide documentation of CWT's repayment to FTE of these amounts.

Third, in your August 7, 1989 response you denied our request for a list of all CWT contributors based on their rights under the first amendment. While we do not accept this argument, we now require only a list, including date and amount, of those contributions made by CWT member organizations identified in your March 1, 1989, response.

Fourth, in response to our subpoena you made mention of a third "thank you" letter sent out by Sen. Humphrey. However, a copy of this letter was never provided. Please provide us with a copy of this letter.

92040922600

Alan P. Dye, Esquire  
Page Two

Fifth, as part of exhibit "B" to your March 1, 1989, response you provided us with a breakdown of the costs for the preparation of the solicitation letter. The first portion of this breakdown related to costs incurred from CMB International Corp. ("CMB") totaling \$1,861.68. In your August 7, 1989, response you provided us with a receipt from CMB to CWT totaling \$5,595.18. Please clarify which portion of the bill went towards the mailing, what the balance relates to, and what allocation method was employed to separate the costs.

We would appreciate your prompt response to these questions to enable us now to expeditiously proceed with this matter. If you have any questions, please contact Jose M. Rodriguez, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel



BY: Lois G. Berner  
Associate General Counsel

92040922601

January 16, 1991

FEC MUR 2810  
Coalition For a Winning Ticket

1. The bank statement of April, 1989 is attached in this submission.
2. FTE transferred money to CWT by way of the individual checks or charges that were documented in the submission of August 7, 1989. Included in the submission were copies of two checks from CWT to FTE that repaid all monies owed to FTE.
3. Attached is the list of oragnizational donations to CWT.
4. Attached is a copy of Sen. Humphrey's thank you letter.
5. The breakdown of the charges on the CMB invoice relates to the cost of mailing the letter to the delegates and the letter to other potential supporters of CWT. The exceptions are: a portion of letterhead printing was for internal office and miscellaneous use; press releases sent to the media, and the cost of the CWT banner.

92040922602

FIRST AMERICAN BANK, N. A.  
740 15TH STREET, N. W.  
WASHINGTON D.C. 20005-1097

ENCLOSURES

2

PAGE NUMBER

1

COALITION FOR A WINNING TICKET  
T/A FREE THE EAGLE  
25 E ST NW  
WASHINGTON DC 20011

TAXPAYER ID  
00-0000000

STATEMENT DATE  
04/28/89

ACCOUNT NUMBER  
3-456-463

MONEY EXCHANGE (202) 637-7565  
DIRECT INQUIRIES TO: CUSTOMER SERVICE (202) 637-7565  
CREDIT (202) 637-7565

BANKXPRESS, FIRST AMERICAN BANK'S PREMIER CASH MANAGEMENT SYSTEM FOR MID-SIZE TO LARGE CORPORATIONS, PROVIDES AN ELECTRONIC WINDOW BETWEEN YOUR OFFICE AND FIRST AMERICAN BANK. BANKXPRESS WILL ENABLE YOU TO ACCESS ACCOUNT BALANCES, ACCOUNT TRANSACTION HISTORY, INITIATE FUNDS TRANSFERS AND ISSUE STOP PAYMENTS, THROUGH THE USE OF A PC AND A MODEM. BANKXPRESS, ELECTRONIC BANKING FROM FIRST AMERICAN BANK. FOR MORE INFORMATION, CONTACT YOUR ACCOUNT OFFICER.

----- CHECKING ACCOUNT SUMMARY -----

ACCOUNT NO.	3-456-463	COMMERCIAL CHECKING
BEGINNING BALANCE 03/31/89.....		3,777.83
0 DEPOSITS/CREDITS.....		.00+
2 CHECKS/DEBITS.....		1,248.53-
SERVICE CHARGES.....		.00-
ENDING BALANCE 04/28/89.....		2,529.30

----- DAILY BALANCE SUMMARY -----

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
04/04	2,657.70	04/12	2,529.30		

----- CHECKS PRESENTED -----

DATE	CHECK NO.	AMOUNT	REFERENCE NO.	DATE	CHECK NO.	AMOUNT
04/04	1022	1,120.15	30324185-30139840	04/12	1023	128.40

\* INDICATES A SKIP IN SEQUENTIAL CHECK NUMBERS

92040922603

Legend CK - Checking ML - Mortgage Loan MONEX - Money Exchange  
SV - Savings CD - Certificate of Deposit CL - Commercial Loan  
CC - Credit Card E - Installment Loan



PLEASE EXAMINE AND REPORT DIFFERENCES IMMEDIATELY  
Notice: See Reverse Side for Important Information



CWT CONTRIBUTIONS FROM ORGANIZATIONS--1988

1.	July 21	Eagle Forum	\$100.
2.	July 22	Congressional Majority Fund	50.
3.	July 22	Gun Owners of America	100.
4.	July 24	College Republicans	100.
5.	July 25	Young Americans for Freedom	100.
6.	July 26	Conservative Caucus	100.
7.	July 27	American Space Frontier Committee	1000.
8.	Aug. 1	Conservative Taxpayers Coalition	500.
9.	Aug. 1	Public Advocate PAC	100.
10.	Aug. 2	Students for America PAC	15.
11.	Aug. 5	National Congressional Club	100.
12.	Aug. 8	Ruff State PAC	<u>800</u>
			3065.

92040922604

---

---

# COALITION FOR A WINNING TICKET

---

---

GORDON HUMPHREY, U.S. SENATE  
Chairman

September 20, 1988

^F1^

^F2^

Dear ^F3^

Please accept my acknowledgement and sincere thanks for your generous contribution of \$^F4 ^ to the Coalition for a Winning Ticket.

Your help made possible the successful activities of the Coalition at the Republican National Convention in New Orleans. Although a precise estimate of the effect of those activities is difficult to make, in my judgment, had the Coalition not carried out its work we would not now have a winning national Republican ticket nor a continuation of the major role conservatives must play in this election and within the Republican party.

Your willingness to provide substantial financial support to the Coalition for a Winning Ticket, at a time when it was unclear whether its program would succeed, will always be remembered and deeply valued by me and many others.

Sincerely,

9 2 0 4 0 9 2 2 6 0 5

91 JAN 29 PM 4: 34

BEFORE THE FEDERAL ELECTION COMMISSION

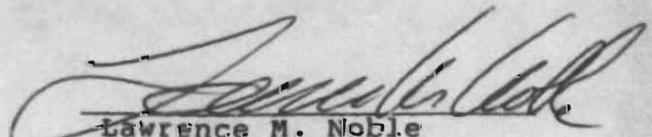
In the Matter of	)	
	)	
Coalition for a Winning Ticket	)	MUR 2810
and Howard Segermark, as treasurer	)	
Free the Eagle, Inc.	)	

**SENSITIVE**

GENERAL COUNSEL'S REPORT

The Office of the General Counsel is prepared to close the investigation in this matter as to Coalition for a Winning Ticket and Howard Segermark, as treasurer, and Free the Eagle, Inc., based on the assessment of the information presently available.

Date 1/28/91

  
Lawrence M. Noble  
General Counsel

92040922606

91 JAN 29 PM 4:34



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

January 29, 1991

**SENSITIVE**

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble *LMN*  
General Counsel

SUBJECT: MUR 2810  
Coalition for a Winning Ticket  
and Howard Segermark, as treasurer  
Free the Eagle, Inc.

Attached for the Commission's review are briefs stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of these briefs and letters notifying the respondents of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe were mailed on January 29, 1991. Following receipt of the respondents' reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Briefs
2. Letters to respondents

92040922607



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

January 29, 1991

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Allan P. Dye, Esquire  
Webster, Chamberlain & Bean  
1747 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

RE: MUR 2810  
Coalition for a Winning Ticket  
and Howard Segermark,  
as treasurer

Dear Mr. Dye:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by your clients, on January 24, 1989, the Federal Election Commission found reason to believe that your clients, violated 2 U.S.C. §§ 433, 434 and 441d, and on June 1, 1989, the Federal Election Commission found reason to believe that your clients violated 2 U.S.C. § 441b(a), 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 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.

92040922608

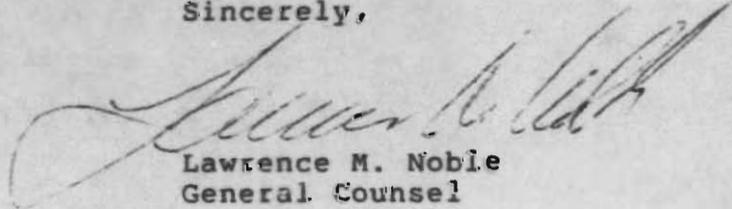
Alan P. Dye, Esquire  
Page Two

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Jose Rodriguez, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,



Lawrence M. Noble  
General Counsel

Enclosure  
Brief

92040922609

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Coalition for a Winning Ticket ) MUR 2810  
and Howard Segermark, )  
as treasurer )

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On January 24, 1989, the Commission found reason to believe Coalition for a Winning Ticket ("CWT") and Howard Segermark, as treasurer, violated 2 U.S.C. §§ 433, 434 and 441d. Further, on June 1, 1989 the Commission found reason to believe respondent violated 441b(a). The Office of General Counsel has conducted an investigation in this matter and is now prepared to recommend findings of probable cause to believe.

II. ANALYSIS

A political committee under the Act is any group of persons that receives contributions or makes expenditures aggregating in excess of \$1,000 per year. 2 U.S.C. § 431(4)(A). A "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office. 2 U.S.C. § 431(8)(A)(i). An "expenditure" includes any purchase, payment, distribution, loan, advance, deposit, or gift of money or anything of value, made by any person for the purpose of influencing any election for Federal office. 2 U.S.C. § 431(9)(A)(i). Each committee must register by filing a Statement of Organization within ten days after becoming a

92040922610

political committee. 2 U.S.C. § 433(a). A committee is required thereafter to file either quarterly or monthly reports of receipts and disbursements during the year in which a regularly scheduled election is held. 2 U.S.C. § 434(a)(4)(A) and (B). A political committee must itemize all contributions from other political committees and all contributions in excess of \$200 from other persons. 2 U.S.C. § 434(b)(3)(A) and (B).

The Act also requires that whenever any person makes an expenditure for the purpose of financing communications expressly advocating the election or defeat of a clearly identified candidate, or solicits any contribution through direct mail that is aimed at the general public, the communication shall contain a disclaimer. 2 U.S.C. § 441d. Furthermore, 11 C.F.R. § 110.11(a)(1) and (a)(1)(iv)(A) state, in relevant parts, that the disclaimer shall be clear and conspicuous so that the reader has adequate notice of who paid for the communication and shall state the full name of the person who paid for the communication on behalf of the political committee.

It is unlawful for any corporation to make a contribution in connection with a federal election, or for any political committee knowingly to accept or receive any such contribution. 2 U.S.C. § 441b(a).

A. Facts

CWT was a coalition of conservative Republicans formed on July 25, 1988, following a meeting held by Sen. Gordon Humphrey. The coalition, comprised of some twenty-four member

92040922611

organizations, had an operating budget of over \$30,000. CWT listed among its executive committee members Sen. Humphrey, Dan Perrin, and Howard Segermark (Chairman, Executive Director, and Chief Financial Officer respectively). Mr. Segermark was also a managing director of Free The Eagle, Inc. ("FTE"), a nonprofit lobbying corporation.<sup>1</sup> CWT apparently used employees and facilities of FTE in carrying out its activities.

By direct mail, CWT solicited funds to influence the Republican nomination for Vice-President, and expressly advocated the defeat of a presidential candidate by stating the need "to defeat liberal Michael Dukakis."

CWT sent out three separate mailings in its efforts to gather support for its campaign to have a conservative Republican picked as the vice-presidential nominee at the 1988 Republican National Convention.<sup>2</sup> The first of these mailings, dated August 1, 1988, was directed at the delegates to the convention attempting to encourage their support for a conservative vice-presidential running mate. The letter advanced CWT's purpose of "communicating to the Vice President ... that conservatives do not feel adequately represented in the Convention, in the campaign and on the ticket" and planning "daily and separate strategy meetings for delegates and

---

1. Mr. Segermark's position with FTE is as a service provider through his company, Segermark Company. It is the company, and not Mr. Segermark individually, that is formally retained.

2. Dan Perrin was primarily responsible for the preparation of the letters, though input was received from Mr. Vigeurie and Mr. Segermark. Sen. Humphrey had final approval of the letters' contents.

92040922612

non delegates leaders, press conferences, and Convention floor activities." The reply form included with the letter urged the delegate to join CWT to help "urge George Bush to select a conservative for Vice President," soliciting an optional \$100 membership fee.

A second mailing was directed at the general public requesting a minimum donation of \$250 in order to satisfy the proposed budget of \$50,000. CWT's self-defined goal in the letter was to "convince George Bush to pick a conservative as his running mate if we are to defeat liberal Michael Dukakis." The letter reiterated CWT's purpose of "planning daily strategy meetings with delegates and other non-delegate leaders in New Orleans."

Enclosed with both of these mailings were press releases issued by Sen. Humphrey. Accompanying the first mailing was Sen. Humphrey's press release of July 27, 1988 which stated in part:

The Coalition for a Winning Ticket is not a stalking horse for any candidate. We are not naming names. We will draw up a list of attributes which we believe George Bush's running mate ought to possess. We feel its [sic] essential to victory have [sic] a Ronald Reagan conservative on the ticket, and over the next three weeks and in New Orleans we intend to try to persuade the Bush campaign and the Republican Party to this point of view.

Enclosed with the second letter was a press release issued by

92040922613

Sen. Humphrey on August 4, 1988. This release stated in part:

The Coalition for a Winning Ticket has secured office space in Washington and New Orleans. We are working actively to united [sic] conservatives in our plea to George Bush. We will be active outside the convention hall, speaking with the press, and we are considering parliamentary maneuvers within the convention up to an [sic] including encouraging the nomination of an alternative vice-presidential candidate.<sup>3</sup>

9 2 0 4 0 9 2 2 6 1 4  
A third letter was sent out thanking those who responded to the initial mailing. Only ten copies of this letter were sent out. It did not contain any solicitation language.

The costs associated with the mailings total \$5,257.88. The first mailing consisted of 4,946 distributions at a total cost of \$1,591.20. The second mailing consisted of 4,804 distributions at a total cost of \$3,666.68. No cost information is available for the third mailing, as it consisted of only ten letters the cost would be negligible. A portion of the original costs associated with these mailings were initially advanced to CWT by FTE, a corporation. In its March 1, 1989 response CWT states that FTE advanced the \$3,666.68 associated with the second mailing.

Also in relation to this project CWT secured office space

---

3. During the convention Sen. Humphrey went before the Committee on Rules and Order of Business appealing the Committee's adoption of a change in the rules eliminating the roll call vote of the states on the nomination of the Vice President.

in both Washington, D.C., and New Orleans, hired support staff, held meetings, and engaged in convention activities.<sup>4</sup> The costs for a portion of these activities were incurred by FTE in the form of direct payments to the vendors. The total costs incurred by FTE for these activities approximate \$15,582.13. Of that amount \$2,510.88 went towards phone service (\$1,028.88 at the Washington, D.C., office and \$1,482.00 at the New Orleans office), and \$2,800 went towards rent for the New Orleans office, with the balance going towards numerous other expenses including, but not limited to, travel, food, printing, couriers, and office supplies.

CWT raised approximately \$36,940 as of December 31, 1988, in order to finance its activities. Most of these funds resulted from personal appeals made either by Sen. Humphrey or Dan Perrin to member and other organizations.<sup>5</sup> By contrast, the mailings generated few contributions. The first mailing generated no returns with the second mailing returning about \$200 to \$400 in contributions.<sup>6</sup> From all funds raised, CWT reimbursed FTE the \$15,582.13 paid to vendors on CWT's behalf for the above mentioned activities. Further, it is suggested both in CWT's March 1, 1989 response and by Mr. Segermark's

---

4. CWT's Washington office consisted of 75 square feet (approximately one desk) at FTE's 2,700 square foot headquarters. In connection with the office space Free The Eagle also provided CWT with receptionist, duplicating and computer services.

5. Included in this total are deposits from FTE to CWT.

6. No record was kept of the receipts generated by the mailing. These figures accord to Mr. Perrin's estimation.

92040922615

testimony that the additional funds advanced to CWT for the mailings were also reimbursed, but the financial records produced reflect no further reimbursements.<sup>7</sup>

B. Application of the Facts

It is this Office's position that CWT's activities clearly served to influence a federal election. The mailings served to advocate the defeat of a named candidate (Michael Dukakis) by proposing the election of a conservative as the Republican Vice-Presidential candidate. The tone of the mailings as well as the numerous other activities planned suggests that CWT intended to not only inform the public of its position as concerned the selection of a vice-presidential candidate but also to take action to influence the convention process in order to ensure that its position was dominant.<sup>8</sup> The nominating convention is an election for purposes of the Act. 2 U.S.C. § 431(1) and (2). The Office of the Vice-president of the United States is a federal office under the Act. 2 U.S.C. § 431(3). Hence, CWT, by attempting to influence the nomination of the Vice-Presidential candidate, raised and spent funds to

7. According to information provided this office by CWT in its August 7, 1989 response, FTE made direct payments to vendors for the benefit of CWT totaling \$15,582.13. According to CWT's March 1, 1989 response, FTE also paid CWT a total of at least \$3,666.68 in connection with the mailings. Thus, FTE provided CWT, either by way of advances or direct payments, at least \$19,248.81 in funds. CWT's bank records reflect only \$15,582.13 transferred by CWT to FTE, leaving a balance of at least \$3,666.68 in funds not reimbursed.

8. In fact, Sen. Humphrey in his press release of August 16, 1988, praises George Bush's choice of Dan Quayle as his running mate, adding in conclusion; "[t]he Coalition for a Winning Ticket [sic] goals have been met."

92040922616

influence a federal election. As all available information suggests, CWT clearly surpassed the Act's \$1,000 thresholds in its efforts to influence a federal election thereby triggering political committee status under the Act.

In its response, CWT denies all allegations, asserting that it could not have been a political committee under the Act because it never "acted at the request, on behalf, or in support of any candidate." Citing Federal Election Commission v. Machinists Non-Partisan Political League, 655 F.2d 380 (D.C. Cir. 1981), cert. denied, 454 U.S. 897 (1981), CWT argues that because it was promoting the selection of any individual meeting a certain established criteria, and not one specific candidate, it was outside the judicial construction of a political committee.

CWT's reliance on Machinists is misplaced. In Machinists the court held that draft committees were not subject to the Act's contribution and expenditure limitation provisions. The court, however, also held that draft committees were political committees under the Act for purposes of the reporting provisions.<sup>9</sup> Therefore, even if CWT was a draft committee it would have been a political committee under the Act subject to the Act's reporting requirements.<sup>10</sup>

---

9. The opinion did not address the separate issue concerning the applicability of the Act's corporate contribution prohibition provisions to draft committees.

10. The court in Federal Election Commission v. Florida for Kennedy Committee, 681 F.2d 1281 (11th Cir. 1982), held draft committees not subject to the Act, as amended through 1976. The court, however, noted that under the 1979 amendments to the Act

92040922617

CWT, however, was not a draft committee. The response concurs, but argues that it was something "even less" regulable under the Act than a draft committee. In fact, CWT's activities clearly rendered it a political committee subject to all the Act's applicable provisions. The Machinists opinion distinguished draft committees from other political committees, noting that draft committees do not seek to influence the electorate's choice of candidate but seek, instead, to influence an individual's choice to become a candidate. CWT's activities, however, did not seek to influence individuals to become candidates but rather directly sought to influence the electorate's (in this case delegates') choice of vice presidential nominee. As such, CWT's activities, unlike the activities associated with draft committees, did not serve to excuse the applicability of Act's limitations and prohibitions. The Act defines a political committee as any group of persons receiving contributions or making expenditures aggregating in excess of \$1,000 for the purpose of influencing a federal election. 2 U.S.C. § 431(4)(A), (8)(A)(i). Thus, because CWT was composed of a group of persons that raised and spent over \$30,000 directed towards influencing the nomination of a candidate for vice-president, a federal office, the respondent was within the Act's definition of a political committee rendering it subject to all applicable provisions, including the

---

(Footnote 10 continued from previous page)  
draft committees would be required to comply with the Act's reporting provisions.

92040922618

registration, reporting, and contribution limitation provisions, of the Act.

Citing United States v. National Committee for Impeachment, 469 F.2d 1135 (2d Cir. 1972), the response further argues that it is not a political committee as its activities were not sufficiently connected with a particular candidate to be rendered election influencing. In concluding that the Committee for Impeachment was not a political committee under the Federal Election Campaign Act of 1971, the court found critical that "the basic thrust of the advertisement is toward impeachment and war-policy condemnation, not toward the election of Congressmen," while the reference to the election of candidates was speculative and incidental. Id. at 1140. In contrast, the entire purpose of CWT's activities was to influence the Republican National Convention's selection of a vice-presidential nominee and thereby increase the likelihood of a general election victory over the Democratic presidential nominee in November. Therefore, whether or not the Commission would accept the court's conclusion in Committee for Impeachment, CWT has triggered political committee status even under that decision.

Moreover, Advisory Opinions ("AOs") 1986-38 and 1980-126 demonstrate that CWT was in fact, by virtue of its activities, a political committee. The Commission in AO 1986-38 opined that an "expenditure" was made where an individual expended funds to air radio and television advertisements urging voters to vote for "conservatives" in a federal election. The script of the

92040922619

advertisement is as follows:

I'm David Stedman, a fellow North Carolinian.

If you want to help preserve the greatness of America, it is critical that you vote on November 4th. We can't keep that greatness unless we send the right people to Washington.

Let's not kid ourselves. This election is a decision between liberals and conservatives. That's clear.

If you want less government, lower taxes, fewer regulations and less government interference in your life, then vote for the conservatives. You know who they are.

Vote for a conservative approach to government.

9 2 0 4 0 9 2 2 6 2 0

On the basis of this script, the Commission concluded that funds expended for the advertisement would constitute expenditures under the Act. The Commission reasoned that "[b]y urging viewers and listeners to 'vote on November 4th' and 'send the right people to Washington,' the message is clearly designed to influence voting in elections for Federal office."<sup>12</sup>

CWT's communications were likewise designed to influence the

---

11. The script also included a disclaimer at the end of the advertising.

12. While the Commission did conclude that expenditures had been made, such expenditures did not trigger the Act's political committee registration and reporting provisions as they were made by an individual using his own funds and not acting in concert with either the candidate or the candidate's campaign committee. In contrast, presently we have an organization using donated funds to finance its activities. Consequently, the Act's registration and reporting provisions are triggered as the respondent clearly meets Section 431(4)(A)'s definition of a political committee.

voting in a federal election by urging delegates to support the selection of a conservative vice-presidential nominee at the Republican National Convention.

9 2 0 4 0 9 2 2 6 2 1

Additionally, in AO 1980-126 the Commission concluded that an organization which sent out communications encouraging independent voters to vote for all Republican candidates in the 1980 general election by asking them to "Vote Republican in 1980" was a political committee subject to all applicable provisions of the Act. The Commission reasoned that the activity was clearly election influencing as it advocated the election of Republican candidates. Like CWT, the opinion's requestor maintained its own banking account, solicited recipients for financial contributions in support of the organization's activities, and advocated the election of candidates meeting certain established criteria. Pursuant to the Commission's reasoning, CWT was a political committee as it advocated the election of conservative Republican candidates.

In consideration of the foregoing, this Office recommends that the Commission find probable cause to believe CWT and Howard Segermark, acting as treasurer, violated 2 U.S.C. §§ 433 and 434.

CWT was in further violation of the Act as a result of its failure to include a disclaimer notice, disclosing the person or persons who authorized and paid for the letters, with the mailings as required pursuant to 2 U.S.C. § 441d. Section 441d requires that a disclaimer accompany any communication which expressly advocates the election or defeat of a clearly

identified candidate or solicits contributions from the general public. In Buckley v. Valeo, 424 U.S. 1 (1976), the Supreme Court defined express advocacy as "communications containing express words of advocacy of election or defeat, such as 'vote for,' 'elect,' 'cast your ballot for,' 'Smith for Congress,' 'vote against,' 'defeat,' 'reject.'" 424 U.S. 44. As mentioned, CWT's communication expressly advocated the defeat of a clearly identified candidate by stating the need "to defeat liberal Michael Dukakis." Moreover, both communications solicited contributions in support of the coalition's activities. Consequently, the communications were required to contain disclaimer notices. For this reason, this Office recommends that the Commission find probable cause to believe CWT and Howard Segermark, acting as treasurer, violated 2 U.S.C. § 441d.

The nature of the relationship between CWT and FTE presents a separate issue. FTE, as described by Sen. Humphrey in his Summary of Activities for CWT, is a national grassroots conservative organization with the membership of over 250,000. It engages in lobbying activity primarily in relation to economic and international issues. During the course of the investigation CWT has repeatedly referred to itself as a project of FTE. Nonetheless, several factors suggest that CWT was a separate and independent organization.

While CWT has during the investigation repeatedly referred to itself as a project of FTE, CWT did in fact, throughout the course of its activities, conduct business and present itself as

92040922622

an independent organization. Indeed, despite CWT's numerous public communications only one mention of FTE can be found. Moreover, this reference, found in Sen. Humphrey's report on CWT, in no way suggests any connection between the two organizations. It simply states that FTE has provided Washington office space for CWT.

Further, CWT was a self supported organization with responsibility for its own financial affairs. It solicited its own contributions, maintained its own bank account, and paid its own bills.<sup>13</sup> It also kept separate offices from FTE.<sup>14</sup>

While there are several factors evidencing a close relationship between the two organizations, including a mutuality of personnel, favorable economic transactions, and a sharing of resources, this Office nevertheless believes that the evidence clearly establishes that CWT was a separate and distinct organization from FTE.

As discussed above, it appears that CWT qualified as a political committee. A political committee is prohibited by the Act from accepting corporate contributions. 2 U.S.C. § 441b(a). CWT accepted funds and services from FTE, a corporation, in violation of the Act. CWT may not argue that FTE was merely a service provider as the transactions were not commercially

13. During CWT's inception FTE made direct payments to certain vendors on CWT's behalf. All these advances were subsequently reimbursed by CWT from its own bank account.

14. As previously mentioned, CWT was provided with a desk at FTE's offices in Washington D.C. The bulk of CWT's activities, however, appear to have been generated from its New Orleans office.

92040922623

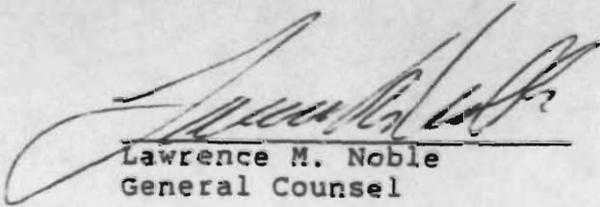
reasonable. See 11 C.F.R. § 114.10. Mr. Segermark testified that FTE agreed to neither interest rates nor formal repayment schedules concerning its transactions with CWT as would be commercially reasonable. Accordingly, this Office recommends that the Commission find probable cause to believe CWT and Howard Segermark, acting as treasurer, violated 2 U.S.C. § 441b(a).

III. GENERAL COUNSEL'S RECOMMENDATIONS

This Office recommends that the Commission find probable cause to believe Coalition for a Winning Ticket and Howard Segermark, as treasurer, violated 2 U.S.C. §§ 433, 434, 441d, and 441b(a).

Date

1/29/91

  
Lawrence M. Noble  
General Counsel

92040922624



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 29, 1991

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. Howard Segermark  
Managing Director  
Free the Eagle, Inc.  
25 E Street, N.W.  
Washington, D.C. 20001

RE: MUR 2810  
Free the Eagle, Inc.

Dear Mr. Segermark:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on June 1, 1989, the Federal Election Commission found reason to believe that Free the Eagle, Inc., violated 2 U.S.C. § 441b(a), 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 a violation has occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

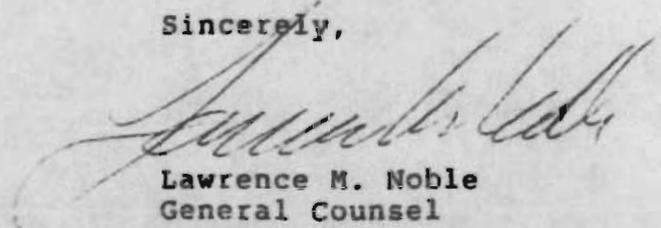
92040922625

Mr. Howard Segermark  
Page Two

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Jose Rodriguez, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,



Lawrence M. Noble  
General Counsel

Enclosure  
Brief

92040922626

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Free the Eagle, Inc. ) MUR 2810

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On June 1, 1989, the Commission found reason to believe Free the Eagle, Inc., ("FTE") violated 2 U.S.C. § 441b(a). The Office of the General Counsel has conducted an investigation in this matter and is now prepared to recommend findings of probable cause to believe.

II. ANALYSIS

A political committee under the Act is any group of persons that receives contributions or makes expenditures aggregating in excess of \$1,000 per year. 2 U.S.C. § 431(4)(A). A "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office.

2 U.S.C. § 431(8)(A)(i). An "expenditure" includes any purchase, payment, distribution, loan, advance, deposit, or gift of money or anything of value, made by any person for the purpose of influencing any election for Federal office.

2 U.S.C. § 431(9)(A)(i).

It is unlawful for any corporation to make a contribution in connection with a federal election. 2 U.S.C. § 441b(a). The term "contribution" includes any direct or indirect payment, loan, deposit or gift of money, or any services, or anything of value to

92040922627

any political party or organization, in connection with a federal election. 2 U.S.C. § 441b(b)(2).

A. Facts

Coalition for a Winning Ticket ("CWT") was a coalition of conservative Republicans formed on July 25, 1988, following a meeting held by Sen. Gordon Humphrey. The coalition, comprised of some twenty-four member organizations, had an operating budget of over \$30,000. CWT listed among its executive committee members Sen. Humphrey, Dan Perrin, and Howard Segermark (Chairman, Executive Director, and Chief Financial Officer respectively).

FTE is a nonprofit lobbying corporation. Mr. Segermark is and was, at the time the transactions at issue occurred, the managing director of FTE.<sup>1</sup> CWT apparently used employees and facilities of FTE in carrying out its activities.

By direct mail, CWT solicited funds to influence the Republican nomination for Vice-President, and expressly advocated the defeat of a presidential candidate by stating the need "to defeat liberal Michael Dukakis."

CWT sent out three separate mailings in its efforts to gather support for its campaign to have a conservative Republican picked as the vice-presidential nominee at the 1988

1. Mr. Segermark's position with FTE is as a service provider through his company, Segermark Company. It is the company, and not Mr. Segermark individually, that is formally retained.

92040922628

9 2 0 4 0 9 2 2 6 2 9

Republican National Convention.<sup>2</sup> The first of these mailings, dated August 1, 1988, was directed at the delegates to the convention attempting to encourage their support for a conservative vice-presidential running mate. The letter advanced CWT's purpose of "communicating to the Vice President ... that conservatives do not feel adequately represented in the Convention, in the campaign and on the ticket" and planning "daily and separate strategy meetings for delegates and non delegates leaders, press conferences, and Convention floor activities." The reply form included with the letter urged the delegate to join CWT to help "urge George Bush to select a conservative for Vice President," soliciting an optional \$100 membership fee.

A second mailing was directed at the general public requesting a minimum donation of \$250 in order to satisfy the proposed budget of \$50,000. CWT's self-defined goal in the letter was to "convince George Bush to pick a conservative as his running mate if we are to defeat liberal Michael Dukakis." The letter reiterated CWT's purpose of "planning daily strategy meetings with delegates and other non-delegate leaders in New Orleans."

Enclosed with both of these mailings were press releases issued by Sen. Humphrey. Accompanying the first mailing was

---

2. Dan Perrin was primarily responsible for the preparation of the letters, though input was received from Mr. Vigourie and Mr. Segermark. Sen. Humphrey had final approval of the letters' contents.

Sen. Humphrey's press release of July 27, 1988 which stated in part:

The Coalition for a Winning Ticket is not a stalking horse for any candidate. We are not naming names. We will draw up a list of attributes which we believe George Bush's running mate ought to possess. We feel its [sic] essential to victory have [sic] a Ronald Reagan conservative on the ticket, and over the next three weeks and in New Orleans we intend to try to persuade the Bush campaign and the Republican Party to this point of view.

Enclosed with the second letter was a press release issued by Sen. Humphrey on August 4, 1988. This release stated in part:

The Coalition for a Winning Ticket has secured office space in Washington and New Orleans. We are working actively to united [sic] conservatives in our plea to George Bush. We will be active outside the convention hall, speaking with the press, and we are considering parliamentary maneuvers within the convention up to an [sic] including encouraging the nomination of an alternative vice-presidential candidate.

A third letter was sent out thanking those who responded to the initial mailing. Only ten copies of this letter were sent out. It did not contain any solicitation language.

3. During the convention Sen. Humphrey went before the Committee on Rules and Order of Business appealing the Committee's adoption of a change in the rules eliminating the roll call vote of the states on the nomination of the Vice President.

92040922630

The costs associated with the mailings total \$5,257.88. The first mailing consisted of 4,946 distributions at a total cost of \$1,591.20. The second mailing consisted of 4,804 distributions at a total cost of \$3,666.68. No cost information is available for the third mailing, as it consisted of only ten letters the cost would be negligible. A portion of the original costs associated with these mailings were initially advanced to CWT by FTE, a corporation. In its March 1, 1989 response CWT states that FTE advanced the \$3,666.68 associated with the second mailing.

9 2 0 4 0 9 2 2 6 3 1  
Also in relation to this project CWT secured office space in both Washington, D.C., and New Orleans, hired support staff, held meetings, and engaged in convention activities.<sup>4</sup> The costs for a portion of these activities were incurred by FTE in the form of direct payments to the vendors. The total costs incurred by FTE for these activities approximate \$15,582.13. Of that amount \$2,510.88 went towards phone service (\$1,028.88 at the Washington, D.C., office and \$1,482.00 at the New Orleans office), and \$2,800 went towards rent for the New Orleans office, with the balance going towards numerous other expenses including, but not limited to, travel, food, printing, couriers, and office supplies.

CWT raised approximately \$36,940 as of December 31, 1988,

---

4. CWT's Washington office consisted of 75 square feet (approximately one desk) at FTE's 2,700 square foot headquarters. In connection with the office space Free The Eagle also provided CWT with receptionist, duplicating and computer services.

in order to finance its activities. Most of these funds resulted from personal appeals made either by Sen. Humphrey or Dan Perrin to member and other organizations.<sup>5</sup> By contrast, the mailings generated few contributions. The first mailing generated no returns with the second mailing returning about \$200 to \$400 in contributions.<sup>6</sup> From all funds raised, CWT reimbursed FTE the \$15,582.13 paid to vendors on CWT's behalf for the above mentioned activities. Further, it is suggested both in CWT's March 1, 1989 response and by Mr. Segermark's testimony that the additional funds advanced to CWT for the mailings were also reimbursed, but the financial records produced reflect no further reimbursements.<sup>7</sup>

B. Application of the Facts

It is this Office's position that CWT's activities served to influence a federal election. The mailings served to advocate the defeat of a named candidate (Michael Dukakis) by proposing the election of a conservative as the Republican Vice-Presidential candidate. The tone of the mailings as well as the numerous other activities planned suggests that CWT

5. Included in this total are deposits from FTE to CWT.

6. No record was kept of the receipts generated by the mailing. These figures accord to Mr. Perrin's estimation.

7. According to information provided this office by CWT in its August 7, 1989 response, FTE made direct payments to vendors for the benefit of CWT totaling \$15,582.13. According to CWT's March 1, 1989 response, FTE also paid CWT a total of at least \$3,666.68 in connection with the mailings. Thus, FTE provided CWT, either by way of advances or direct payments, at least \$19,248.81 in funds. CWT's bank records reflect only \$15,582.13 transferred by CWT to FTE, leaving a balance of at least \$3,666.68 in funds not reimbursed.

92040922632

intended to not only inform the public of its position as concerned the selection of a vice-presidential candidate but also to take action to influence the convention process in order to ensure that its position was dominant.<sup>8</sup> The nominating convention is an election for purposes of the Act. 2 U.S.C. § 431(1) and (2). The Office of the Vice-president of the United States is a federal office under the Act. 2 U.S.C. § 431(3). Hence, CWT, by attempting to influence the nomination of the Vice-Presidential candidate, raised and spent funds to influence a federal election. As all available information suggests, CWT clearly surpassed the Act's \$1,000 thresholds in its efforts to influence a federal election thereby triggering political committee status under the Act.

In its response, with which FTE fully concurred, CWT denies all allegations, asserting that it could not have been a political committee under the Act because it never "acted at the request, on behalf, or in support of any candidate." Citing Federal Election Commission v. Machinists Non-Partisan Political League, 655 F.2d 380 (D.C. Cir. 1981), cert. denied, 454 U.S. 897 (1981), CWT argues that because it was promoting the selection of any individual meeting a certain established criteria, and not one specific candidate, it was outside the judicial construction of a political committee.

CWT's reliance on Machinists is misplaced. In Machinists

8. In fact, Sen. Humphrey in his press release of August 16, 1988, praises George Bush's choice of Dan Quayle as his running mate, adding in conclusion; "[t]he Coalition for a Winning Ticket [sic] goals have been met."

92040922633

the court held that draft committees were not subject to the Act's contribution and expenditure limitation provisions. The court, however, also held that draft committees were political committees under the Act for purposes of the reporting provisions.<sup>9</sup> Therefore, even if CWT was a draft committee it would have been a political committee under the Act subject to the Act's reporting requirements.<sup>10</sup>

CWT, however, was not a draft committee. The response concurs, but argues that it was something "even less" regulable under the Act than a draft committee. In fact, CWT's activities clearly rendered it a political committee subject to all the Act's applicable provisions. The Machinists opinion distinguished draft committees from other political committees, noting that draft committees do not seek to influence the electorate's choice of candidate but seek, instead, to influence an individual's choice to become a candidate. CWT's activities, however, did not seek to influence individuals to become candidates but rather directly sought to influence the electorate's (in this case delegates') choice of vice presidential nominee. As such, CWT's activities, unlike the activities associated with draft committees, did not serve to

---

9. The opinion did not address the separate issue concerning the applicability of the Act's corporate contribution prohibition provisions to draft committees.

10. The court in Federal Election Commission v. Florida for Kennedy Committee, 681 F.2d 1281 (11th Cir. 1982), held draft committees not subject to the Act, as amended through 1976. The court, however, noted that under the 1979 amendments to the Act draft committees would be required to comply with the Act's reporting provisions.

92040922634

excuse the applicability of the Act's limitations and prohibitions. The Act defines a political committee as any group of persons receiving contributions or making expenditures aggregating in excess of \$1,000 for the purpose of influencing a federal election. 2 U.S.C. § 431(4)(A), (8)(A)(i). Thus, because CWT was composed of a group of persons that raised and spent over \$30,000 directed towards influencing the nomination of a candidate for vice-president, a federal office, it was within the Act's definition of a political committee rendering it subject to all applicable provisions, including the contribution limitation provisions, of the Act.

Citing United States v. National Committee for Impeachment, 469 F.2d 1135 (2d Cir. 1972), the response further argues that it is not a political committee as its activities were not sufficiently connected with a particular candidate to be rendered election influencing. In concluding that the Committee for Impeachment was not a political committee under the Federal Election Campaign Act of 1971, the court found critical that "the basic thrust of the advertisement is toward impeachment and war-policy condemnation, not toward the election of Congressmen," while the reference to the election of candidates was speculative and incidental. Id. at 1140. In contrast, the entire purpose of CWT's activities was to influence the Republican National Convention's selection of a vice-presidential nominee and thereby increase the likelihood of a general election victory over the Democratic presidential nominee in November. Therefore, whether or not the Commission

92040922635

would accept the court's conclusion in Committee for Impeachment, CWT has triggered political committee status even under that decision.

Moreover, Advisory Opinions ("AOs") 1986-38 and 1980-126 demonstrate that CWT was in fact, by virtue of its activities, a political committee. The Commission in AO 1986-38 opined that an "expenditure" was made where an individual expended funds to air radio and television advertisements urging voters to vote for "conservatives" in a federal election. The script of the advertisement is as follows:

I'm David Stedman, a fellow North Carolinian.

If you want to help preserve the greatness of America, it is critical that you vote on November 4th. We can't keep that greatness unless we send the right people to Washington.

Let's not kid ourselves. This election is a decision between liberals and conservatives. That's clear.

If you want less government, lower taxes, fewer regulations and less government interference in your life, then vote for the conservatives. You know who they are.

Vote for a conservative approach to government.<sup>11</sup>

On the basis of this script, the Commission concluded that funds expended for the advertisement would constitute expenditures under the Act. The Commission reasoned that "[b]y urging

11. The script also included a disclaimer at the end of the advertising.

92040922636

viewers and listeners to 'vote on November 4th' and 'send the right people to Washington,' the message is clearly designed to influence voting in elections for Federal office."<sup>12</sup>

CWT's communications were likewise designed to influence the voting in a federal election by urging delegates to support the selection of a conservative vice-presidential nominee at the Republican National Convention.

9 2 0 4 0 9 2 2 6 3 7

Additionally, in AO 1980-126 the Commission concluded that an organization which sent out communications encouraging independent voters to vote for all Republican candidates in the 1980 general election by asking them to "Vote Republican in 1980" was a political committee subject to all applicable provisions of the Act. The Commission reasoned that the activity was clearly election influencing as it advocated the election of Republican candidates. Like CWT, the requester in the opinion maintained its own banking account, solicited recipients for financial contributions in support of the organization's activities, and advocated the election of candidates meeting certain established criteria. Pursuant to the Commission's reasoning, CWT was a political committee as it advocated the election of conservative Republican candidates.

---

12. While the Commission did conclude that expenditures had been made, such expenditures did not trigger the Act's political committee registration and reporting provisions as they were made by an individual using his own funds and not acting in concert with either the candidate or the candidate's campaign committee. In contrast, presently we have an organization using donated funds to finance its activities. Consequently, the Act's registration and reporting provisions are triggered as the respondent clearly meets Section 431(4)(A)'s definition of a political committee.

As all evidence indicates, CWT was a political committee conducting activities in connection with a federal election. Consequently, all funds transferred by FTE to CWT in connection with this project were contributions pursuant to Section 431(8), in violation of the Act pursuant to Section 441b(a).

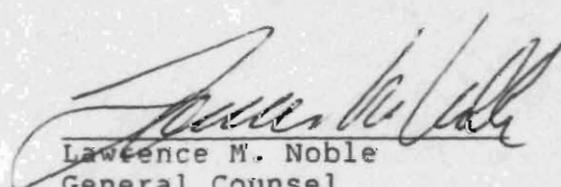
FTE contributed at least \$19,249.07 in corporate funds, either in the form of advances or direct payments to vendors, to CWT in connection with these activities, in violation of the Act. Moreover, FTE may not argue that it was merely a service provider as the transactions were not commercially reasonable. See 11 C.F.R. § 114.10. Mr. Segermark testified that FTE agreed to neither interest rates nor formal repayment schedules concerning its transactions with CWT as would be commercially reasonable. Accordingly, this Office recommends that the Commission find probable cause to believe FTE violated 2 U.S.C. § 441b(a).

III. GENERAL COUNSEL'S RECOMMENDATION

This Office recommends that the Commission find probable cause to believe Free the Eagle, Inc., violated 2 U.S.C. § 441b(a).

Date

1/29/91

  
Lawrence M. Noble  
General Counsel

92040922638

OGC 0138

LAW OFFICES  
**WEBSTER, CHAMBERLAIN & BEAN**

1747 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20006

(202) 785-9500

FAX: (202) 835-0243

OF COUNSEL  
CHARLES E. CHAMBERLAIN

GEORGE D. WEBSTER  
J. COLEMAN BEAN  
ARTHUR L. HEROLD  
ALAN P. DYE  
EDWARD D. COLEMAN  
BURKETT VAN KIRK  
FRANK M. NORTHAM  
GERARD P. PANARO  
JOHN W. HAZARD, JR.  
CHARLES M. WATKINS  
HUGH K. WEBSTER  
ANNE B. POPE

February 21, 1991

VIA HAND DELIVERY

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
91 FEB 22 PM 12:09

92040922639

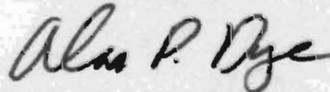
Mr. Jose Rodriguez  
Office of General Counsel  
Federal Election Commission  
999 E St., N.W.  
Washington, DC 20463

Re: MUR 2810; Coalition for  
a Winning Ticket and  
Howard Segermark as Treasurer

Dear Mr. Rodriguez:

As you discussed with Hugh Webster on the telephone this morning, we would like to request an extension of time to respond to the General Counsel's "reason to believe" finding, due to the need to further consult with our client. We request an extension of twenty (20) days from the due date, i.e., until March 11th.

Very truly yours,



Alan P. Dye

APD:dla

RECEIVED  
FEDERAL ELECTION COMMISSION  
ADMINISTRATIVE DIVISION  
91 FEB 21 PM 1:12



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

February 25, 1991

Alan P. Dye, Esquire  
Webster, Chamberlain & Bean  
1747 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

RE: MUR 2810  
Coalition for a Winning Ticket  
and Howard Segermark, as  
treasurer

Dear Mr. Dye:

This is in response to your letter dated February 21, 1991, which we received on February 22, 1991, requesting an extension of twenty (20) days to respond to the Commission's letter of January 29, 1991. 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 11, 1991.

If you have any questions, please contact Jose M. Rodriguez, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

BY: Jonathan Bernstein  
Assistant General Counsel

92040922640



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

March 1, 1991

Mr. Howard Segermark  
Managing Director  
Free the Eagle, Inc.  
25 E Street, N.W.  
Washington, D.C. 20001

RE: MUR 2810  
Free the Eagle, Inc.

Dear Mr. Segermark:

On January 29, 1991, you were notified that the Office of the General Counsel is prepared to recommend that the Federal Election Commission find probable cause to believe that Free the Eagle, Inc. violated 2 U.S.C. § 441b(a). On that same date, you were sent a brief stating the position of the General Counsel on the legal and factual issues of the case.

You were informed that you had 15 days from your date of receipt to file a responsive brief. To date, you have not responded. Unless we receive a response from you within 10 days, this Office will proceed to the Commission with recommendations.

Should you have any questions, please contact Jose M. Rodriguez, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

BY: Jonathan Bernstein  
Assistant General Counsel

92040922641

06C 0301

LAW OFFICES  
WEBSTER, CHAMBERLAIN & BEAN

1747 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20006

(202) 785-9500

FAX: (202) 835-0243

OF COUNSEL

CHARLES E. CHAMBERLAIN

GEORGE D. WEBSTER  
J. COLEMAN BEAN  
ARTHUR L. HEROLD  
ALAN P. DYE  
EDWARD D. COLEMAN  
BURKETT VAN KIRK  
FRANK M. NORTHAM  
GERARD P. PANARO  
JOHN W. HAZARD, JR.  
CHARLES M. WATKINS  
HUGH K. WEBSTER  
ANNE B. POPE

March 11, 1991

VIA HAND DELIVERY

91 MAR 12 AM 2:47

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL

Lawrence M. Noble, Esq.  
General Counsel  
Federal Election Commission  
999 E St., N.W.  
Washington, DC 20463

Re: MUR 2810; Coalition for a  
Winning Ticket and  
Howard Segermark, Treasurer

Dear Mr. Noble:

This is in response to your letter of January 29, 1991, regarding the above-referenced matter, and in rebuttal to the General counsel's finding of reason to believe that Coalition for a Winning Ticket and/or Howard Segermark (hereinafter referred to collectively as "CWT") violated certain provisions of the Federal Election Campaign Act ("FECA").

I. CWT Was Not a "Political Committee" as Defined by FECA and the United States Supreme Court.

In its brief, the General Counsel concludes that CWT violated sections 433, 434, and 441b(a) of FECA. Section 433 generally requires a political committee to register with the FEC. Section 434 generally imposes certain reporting requirements on treasurer's of political committees. According to the General Counsel, under Section 441b(a) "[a] political committee is prohibited . . . from accepting corporate contributions." The applicability of all of these sections, then, is entirely dependent upon CWT having been a "political committee," which it was not.

FECA defines a "political committee" as "any committee, club, association, or other group of persons which receives contributions in excess of \$1,000 during a calendar year or which makes expenditures in excess of \$1,000 during a calendar year." 2 U.S.C. §431(4)(A). However, the U.S. Supreme Court has held that in order to be constitutionally valid the term "political

92040922642

Lawrence M. Noble, Esq.  
March 11, 1991  
Page Two

committee" may encompass only those organizations that are "under the control of a candidate or the major purpose of which is the nomination or election of a candidate." Buckley v. Valeo, 424 U.S. 1, 79 (1976); FEC v. Massachusetts Citizens for Life, 479 U.S. 238, 252 and n. 6 (1986). In Buckley v. Valeo, the Court stated as follows:

To fulfill the purpose of the Act 'political committee' need only encompass organizations that are under the control of a candidate or the major purpose of which is the nomination or election of a candidate. Expenditures of candidates and of "political committees" so construed can be assumed to fall within the core area sought to be addressed by Congress. They are, by definition, campaign related.

This statement was made with respect to reporting requirements. To impose reporting requirements, therefore, on an organization without a clearly identified candidate would be again unconstitutional. Citing Buckley, the court in MCFL held that, for the purposes of reporting, the defendant was not a political committee because it was neither under the control of a candidate nor had as its major purpose the nomination or election of a candidate. 479 U.S. 238, 253, n. 6.

Sections 433, 434, and 441b(a), therefore cannot be applied to CWT. CWT publicized the views of its members that a conservative should be the Republican Vice Presidential candidate, without selecting or supporting any specific candidate or list of candidates. CWT never named any individual whom it wished to have named as the Vice Presidential candidate, nor did CWT ever have any particular individual or individuals in mind. The General Counsel does not dispute these facts.

Section 434 is somewhat broader than Section 433, in that section 434 applies to so-called "draft committees," which seek to "draft" individuals who are not actually candidates. In addition to the fact that Section 434 would be unconstitutional as applied to CWT, as discussed above, Section 434 could not otherwise be applicable to CWT, again because there was never any identifiable individual involved. In any event, the General Counsel expressly concedes in its brief that "CWT, however, was not a draft committee."

92040922643

Lawrence M. Noble, Esq.  
March 11, 1991  
Page Three

With respect to section 441b(a) in particular, the most important point is CWT never received any contributions from a corporation. The General Counsel accuses CWT of having not fully reimbursed Free The Eagle ("FTE") for amounts advanced by FTE. This is absolutely untrue. CWT has reimbursed FTE in full, and CWT can document this fact. There cannot have been any violation of 441b(a), therefore.

II. CWT Did Not Engage In Express Advocacy of the Election Or Defeat of a Candidate

The General Counsel also argues that CWT violated section 441d of FECA because none of CWT's publications included a disclaimer of some kind. In order to be subject to Section 441d, a person must expressly advocate the election or defeat of a clearly identified candidate or solicit contributions.

The General Counsel has taken as single group of words, "to defeat liberal Michael Dukakis," entirely out of context and attempted to establish that it proves CWT engaged in express advocacy. In doing so the General Counsel has completely distorted the communication contained in CWT's mailings. Those mailings, taken as a whole as they must be, do not advocate the defeat of Michael Dukakis. Rather, they advocate attempting to have George Bush select an acceptable running mate. The conduct advocated is not voting against Michael Dukakis. Indeed no reasonable person would expend any funds advocating to Republican Convention delegates the defeat of Michael Dukakis, since all of them no doubt would seek his defeat in any event. In fact, no conduct whatsoever is advocated with respect to Michael Dukakis. The conduct advocated solely relates to George Bush's selection. The General Counsel's attempt to impose a contrary meaning on CWT's communications is completely without foundation, as a reading of CWT's mailings will demonstrate to any reasonable person.

With respect to soliciting contributions, the term "contribution" is defined under FECA generally as the transfer of anything of value "for the purpose of influencing any election for federal office." 2. U.S.C. §431(8)(A)(i). The General Counsel maintains that the contributions given to CWT were for the purpose of influencing an election. This is not true. The relevant "election" is the Republican National Convention, and the electors are the delegates to that Convention. CWT never made any attempt to contact or otherwise influence these delegates, nor does the General Counsel allege that there was any such

92040922644

Lawrence M. Noble, Esq.  
March 11, 1991  
Page Four

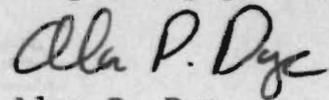
attempt. The purpose of CWT was to attempt to influence George Bush in his personal selection, and the General Counsel has not taken the position that Bush's selection was an "election."

III. Conclusion

The General Counsel's strained arguments may reflect his frustration at the truly unique nature of CWT, but the fact remains that CWT's conduct does not subject it to FECA as that statute is presently written.

For the foregoing reasons, all proceedings with respect to MUR 2810 should be closed. In the interest of ending this matter as quickly as possible, CWT and Howard Segermark would be interested in pursuing conciliation pursuant to 11 C.F.R. §111.18(d).

Very truly yours,



Alan P. Dye

APD:dla

92040922645

06-C 0338

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

LAW OFFICES  
**WEBSTER, CHAMBERLAIN & BEAN**  
1747 PENNSYLVANIA AVENUE, N. W.  
WASHINGTON, D. C. 20006

91 MAR 12 PM 3:04

GEORGE D. WEBSTER  
J. COLEMAN BEAN  
ARTHUR L. HEROLD  
ALAN P. DYE  
EDWARD D. COLEMAN  
BURKETT VAN KIRK  
FRANK M. NORTHAM  
GERARD P. PANARO  
JOHN W. HAZARD, JR.  
CHARLES M. WATKINS  
HUGH K. WEBSTER  
ANNE S. POPE

(202) 785-9500  
FAX: (202) 835-0243

OF COUNSEL  
CHARLES E. CHAMBERLAIN

March 12, 1991

VIA HAND DELIVERY

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
91 MAR 13 AM 10:34

Lawrence M. Noble, Esq.  
General Counsel  
Federal Election Commission  
999 E St., N.W.  
Washington, DC 20463

Re: MUR 2810; Free The Eagle, Inc.

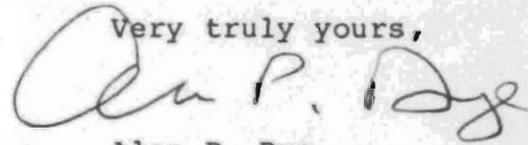
Dear Mr. Noble:

This is in response to your letter of January 29, 1991, regarding the above-referenced matter, and in rebuttal to the General Counsel's finding of reason to believe that Free The Eagle, Inc. violated the Federal Election Campaign Act.

For the reasons stated by Coalition for a Winning Ticket and Howard Segermark, in the March 11, 1991 letter to the General Counsel (copy enclosed), all proceedings with respect to MUR 2810 should be closed.

In the interest of ending this matter as quickly as possible, Free The Eagle, Inc. would be interested in pursuing conciliation pursuant to 11 C.F.R. §111.18(d).

Very truly yours,



Alan P. Dye

APD:dla  
Enclosure

92040922646

LAW OFFICES  
WEBSTER, CHAMBERLAIN & BEAN  
1747 PENNSYLVANIA AVENUE, N. W.  
WASHINGTON, D. C. 20006  
(202) 785-9500  
FAX: (202) 835-0243

GEORGE D. WEBSTER  
J. COLEMAN BEAN  
ARTHUR L. HEROLD  
ALAN P. BYE  
EDWARD D. COLEMAN  
BURRETT VAN KIRK  
FRANK H. NORTHAM  
GERARD P. PANARO  
JOHN W. HAZARD, JR.  
CHARLES M. WATKINS  
HUGH K. WEBSTER  
ANNE B. POPE

OF COUNSEL  
CHARLES E. CHAMBERLAIN

March 11, 1991

VIA HAND DELIVERY

Lawrence M. Noble, Esq.  
General Counsel  
Federal Election Commission  
999 E St., N.W.  
Washington, DC 20463

Re: MUR 2810; Coalition for a  
Winning Ticket and  
Howard Segermark, Treasurer

Dear Mr. Noble:

This is in response to your letter of January 29, 1991, regarding the above-referenced matter, and in rebuttal to the General Counsel's finding of reason to believe that Coalition for a Winning Ticket and/or Howard Segermark (hereinafter referred to collectively as "CWT") violated certain provisions of the Federal Election Campaign Act ("FECA").

I. CWT Was Not a "Political Committee" as Defined by FECA and the United States Supreme Court.

In its brief, the General Counsel concludes that CWT violated sections 433, 434, and 441b(a) of FECA. Section 433 generally requires a political committee to register with the FEC. Section 434 generally imposes certain reporting requirements on treasurer's of political committees. According to the General Counsel, under Section 441b(a) "[a] political committee is prohibited . . . from accepting corporate contributions." The applicability of all of these sections, then, is entirely dependent upon CWT having been a "political committee," which it was not.

FECA defines a "political committee" as "any committee, club, association, or other group of persons which receives contributions in excess of \$1,000 during a calendar year or which makes expenditures in excess of \$1,000 during a calendar year." 2 U.S.C. §431(4)(A). However, the U.S. Supreme Court has held that in order to be constitutionally valid the term "political

92040922647

Lawrence M. Noble, Esq.  
March 11, 1991  
Page Two

committee" may encompass only those organizations that are "under the control of a candidate or the major purpose of which is the nomination or election of a candidate." Buckley v. Valeo, 424 U.S. 1, 79 (1976); FEC v. Massachusetts Citizens for Life, 479 U.S. 238, 252 and n. 6 (1986). In Buckley v. Valeo, the Court stated as follows:

To fulfill the purpose of the Act 'political committee' need only encompass organizations that are under the control of a candidate or the major purpose of which is the nomination or election of a candidate. Expenditures of candidates and of "political committees" so construed can be assumed to fall within the core area sought to be addressed by Congress. They are, by definition, campaign related.

This statement was made with respect to reporting requirements. To impose reporting requirements, therefore, on an organization without a clearly identified candidate would be again unconstitutional. Citing Buckley, the court in MCFL held that, for the purposes of reporting, the defendant was not a political committee because it was neither under the control of a candidate nor had as its major purpose the nomination or election of a candidate. 479 U.S. 238, 253, n. 6.

Sections 433, 434, and 441b(a), therefore cannot be applied to CWT. CWT publicized the views of its members that a conservative should be the Republican Vice Presidential candidate, without selecting or supporting any specific candidate or list of candidates. CWT never named any individual whom it wished to have named as the Vice Presidential candidate, nor did CWT ever have any particular individual or individuals in mind. The General Counsel does not dispute these facts.

Section 434 is somewhat broader than Section 433, in that section 434 applies to so-called "draft committees," which seek to "draft" individuals who are not actually candidates. In addition to the fact that Section 434 would be unconstitutional as applied to CWT, as discussed above, Section 434 could not otherwise be applicable to CWT, again because there was never any identifiable individual involved. In any event, the General Counsel expressly concedes in its brief that "CWT, however, was not a draft committee."

92040922648

Lawrence M. Noble, Esq.  
March 11, 1991  
Page Three

With respect to section 441b(a) in particular, the most important point is CWT never received any contributions from a corporation. The General Counsel accuses CWT of having not fully reimbursed Free The Eagle ("FTE") for amounts advanced by FTE. This is absolutely untrue. CWT has reimbursed FTE in full, and CWT can document this fact. There cannot have been any violation of 441b(a), therefore.

II. CWT Did Not Engage In Express Advocacy of the Election Or Defeat of a Candidate

The General Counsel also argues that CWT violated section 441d of FECA because none of CWT's publications included a disclaimer of some kind. In order to be subject to Section 441d, a person must expressly advocate the election or defeat of a clearly identified candidate or solicit contributions.

The General Counsel has taken as single group of words, "to defeat liberal Michael Dukakis," entirely out of context and attempted to establish that it proves CWT engaged in express advocacy. In doing so the General Counsel has completely distorted the communication contained in CWT's mailings. Those mailings, taken as a whole as they must be, do not advocate the defeat of Michael Dukakis. Rather, they advocate attempting to have George Bush select an acceptable running mate. The conduct advocated is not voting against Michael Dukakis. Indeed no reasonable person would expend any funds advocating to Republican Convention delegates the defeat of Michael Dukakis, since all of them no doubt would seek his defeat in any event. In fact, no conduct whatsoever is advocated with respect to Michael Dukakis. The conduct advocated solely relates to George Bush's selection. The General Counsel's attempt to impose a contrary meaning on CWT's communications is completely without foundation, as a reading of CWT's mailings will demonstrate to any reasonable person.

With respect to soliciting contributions, the term "contribution" is defined under FECA generally as the transfer of anything of value "for the purpose of influencing any election for federal office." 2. U.S.C. §431(8)(A)(i). The General Counsel maintains that the contributions given to CWT were for the purpose of influencing an election. This is not true. The relevant "election" is the Republican National Convention, and the electors are the delegates to that Convention. CWT never made any attempt to contact or otherwise influence these delegates, nor does the General Counsel allege that there was any such

92040922649

Lawrence M. Noble, Esq.  
March 11, 1991  
Page Four

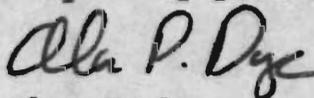
attempt. The purpose of CWT was to attempt to influence George Bush in his personal selection, and the General Counsel has not taken the position that Bush's selection was an "election."

III. Conclusion

The General Counsel's strained arguments may reflect his frustration at the truly unique nature of CWT, but the fact remains that CWT's conduct does not subject it to FECA as that statute is presently written.

For the foregoing reasons, all proceedings with respect to MUR 2810 should be closed. In the interest of ending this matter as quickly as possible, CWT and Howard Segermark would be interested in pursuing conciliation pursuant to 11 C.F.R. §111.18(d).

Very truly yours,



Alan P. Dye

APD:dla

92040922650

RECEIVED  
FEDERAL ELECTION COMMISSION  
SECRETARIAN

91 JUN 24 PM 4:26

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Coalition for a Winning Ticket )  
and Howard Segermark, as treasurer )  
Free the Eagle, Inc. )

MUR 2810

**SENSITIVE**

**JUL 9 - 1991**

GENERAL COUNSEL'S REPORT

**EXECUTIVE SESSION**

I. BACKGROUND

This matter stems from a referral from the Department of Justice received by the Federal Election Commission (the "Commission"). On January 24, 1989, the Commission found reason to believe Coalition for a Winning Ticket ("CWT") and its treasurer violated 2 U.S.C §§ 433, 434, and 441d. Underlying the Commission's determination was a fundraising letter sent by CWT requesting contributions "of at least \$250" in order "to convince George Bush to pick a conservative as his running mate if we are to defeat liberal Michael Dukakis".<sup>1</sup> CWT fundraising letter to "Fellow Conservatives" at 1. Because CWT appeared to have exceeded the Act's \$1,000 threshold for becoming a political committee, but had not registered or reported with the Commission, and had not placed a disclaimer on the fundraising letter, the Commission found reason to believe the respondents violated these sections of the Act.

1. Discovery disclosed another similar fundraising letter addressed to Dear Delegate. This letter was distributed prior to the distribution of the letter mentioned in the complaint.

92040922651

Based upon information uncovered during the course of the investigation, the Commission subsequently found reason to believe CWT violated 2 U.S.C. § 441b(a). The basis for the Commission's determination was that it appeared CWT had accepted goods and services from Free the Eagle, Inc., ("FTE"), an incorporated organization. The Commission also then found reason to believe that FTE violated 2 U.S.C. § 441b(a).

On January 28, 1991, this Office informed the Commission that it was prepared to close the investigation in this matter. On the following date respondents were notified that the General Counsel was prepared to recommend to the Commission findings of probable cause to believe and were provided with briefs stating the factual and legal basis for the recommendations. Responses have been received from both respondents CWT and FTE.<sup>2</sup>

## II. ANALYSIS

### A. Political Committee Status

There is little novelty in the responsive brief. The arguments advanced by counsel for CWT are much like those previously advanced in response to the factual and legal analysis accompanying the Commission's reason to believe findings. In essence, counsel argues that CWT is not subject to the Act because its activities were not connected with any particular candidate,

---

2. FTE's response is in the form of a letter adopting all arguments advanced by CWT in its responsive brief. These responses are attached. Also attached are documentary materials received by this Office not previously circulated. The deposition of Howard Segermark referred to in the General Counsel's Briefs and in the present report is on file in this Office.

92040922652

and, as such, did not serve to render it a political committee pursuant to the Act. Compare Brief for Respondent CWT at 1-2 and Respondent CWT's March 1, 1989, Response at 1-2. As fully examined in the General Counsel's Brief, the Act and related legal precedent nowhere requires that an organization be associated with or engage in activities relating to any particular candidate for such activity to be deemed as election influencing. General Counsel's Brief at 8-12. CWT accepted contributions and made expenditures in excess of \$1,000 with the purpose of influencing the nomination of the vice-presidential candidate at the 1988 Republican National Convention, an election for purposes of the Act, thereby triggering political committee status. Id at 7-8. Consequently, CWT was required to register and report pursuant to Sections 433 and 434 of the Act.

**B. Corporate Contributions**

Focusing on the violations concerning section 441b(a) of the Act, counsel next argues that CWT never received any contributions, as defined in the Act, from FTE and that all funds advanced by FTE to CWT have been reimbursed. Counsel's arguments are erroneous. The funds advanced to CWT by FTE may be properly categorized as contributions as they were not commercially reasonable extensions of credit under 11 C.F.R. § 114.10. General Counsel's Brief at 14-15. Moreover, examination of documents provided by CWT reveal \$3,666.68 in unrefunded funds. Id. at 7 n. 7. As evidenced in the General Counsel's Brief, FTE made and CWT accepted a minimum of \$19,248 in both refunded and unrefunded corporate contributions in violation of the Act.

92040922653

C. Disclaimer

In the second portion of the responsive brief counsel addresses the disclaimer violation, first arguing that CWT's communication to "Fellow Conservatives" did not contain express advocacy and, consequently, did not violate section 441d as it did not require a disclaimer. Counsel maintains that, despite the express exhortation to "defeat liberal Michael Dukakis," the communication's import was not to advocate voting against Michael Dukakis, but rather, to advocate attempting to have George Bush select an acceptable running mate, i.e. one that would help to defeat Michael Dukakis. The response suggests that no reasonable person would expend any funds advocating to Republican Convention delegates the defeat of Michael Dukakis, since they all seek his defeat in any event.

In the first instance, the communication at issue was not directed at the delegates, but to a larger audience, identified by CWT as "known contributors to conservative causes." Segermark Deposition at 88. Moreover, a communication which advocates the defeat of a federal candidate does not lose its nature simply because it is directed to a sympathetic audience. Finally, taken as whole, the communication does contain advocacy of the defeat of a clearly identified candidate.

The communication solicits funds for "as important a project as we conservatives will undertake in this election year.... [a]nd that project is to convince George Bush to pick a conservative as his running mate if we are to defeat liberal Michael Dukakis." The communication goes on to discuss a strategy of action before

92040922654

9 2 0 4 0 9 2 2 6 5 5

and at the Republican National Convention to achieve the nomination of a vice presidential candidate with a conservative philosophy. Thus, the explicit message to defeat presidential candidate Dukakis is not incidental, or accidental, to the communication; rather it describes the overarching goal of the effort. Moreover, it was undoubtedly designed to enhance CWT's fundraising appeal. In sum, this Office has not "taken a[] single group of words ... entirely out of context," as argued by counsel (Brief for Respondent CWT at 3), but has read the language of the communication taken as a whole. For these reasons, and those expressed in the General Counsel's Brief at 12-13, CWT's communication to "Fellow Conservatives" was required to contain a disclaimer notice. See 2 U.S.C. § 441d and 11 C.F.R. § 110.11(a)(1).

Secondly, counsel argues that neither CWT's communication addressed to "Fellow Conservatives" nor its previous communication addressed to "Delegates" required a disclaimer because no contributions, as defined in the Act, were solicited. It is specifically argued that while funds were solicited and received, these funds did not constitute contributions under the Act as they were not for the purpose of influencing a federal election. Counsel notes that the relevant election is the Republican National Convention, and the electors are the delegates to that Convention. CWT never made any attempt, the argument continues, to contact or otherwise influence these delegates, but rather attempted to influence George Bush in his selection of a running mate.

9 2 0 4 0 9 2 2 6 5 6

Contrary to counsel's representation, CWT did attempt to influence the electorate's, i.e. delegates', choice of vice-presidential nominee. As mentioned, CWT distributed a mailing addressed to the "delegates," urging them to support CWT's efforts in convincing George Bush to gain a conservative vice-presidential running mate. Though couched in terms of influencing George Bush's selection of a running mate, the clear import of the communication is to gain the delegates' support for a conservative vice-presidential nominee. Further evidence of CWT's electoral involvement may be found in Sen. Humphrey's invocation of the formal electoral procedures by going before the Committee on Rules and Order of Business appealing the Committee's adoption of a change in the rules. The proposed change would have allowed for a roll call vote of states on the nomination of the Vice President, thus, affording the delegates opportunity to voice their separate votes for an alternative vice-presidential nominee, presumably a conservative one. In light of CWT's activities it becomes evident that all funds received as a result of the solicitations contained in the two communications are contributions. Moreover, as previously mentioned, the communication addressed to "Fellow Conservatives" contained express advocacy of the defeat of a clearly identified candidate. See 2 U.S.C. § 441d(a). Consequently, the communications were required to contain disclaimer notices.

**D. Conclusion**

As noted, counsel's arguments are without merit. CWT has both raised and expended funds for the purpose of influencing a

federal election without registering and reporting as required under the Act. CWT has also failed to provide for an accompanying disclaimer to its communications and has accepted corporate contributions, all in violation of the Act. Accordingly, the Office of the General Counsel recommends that the Commission find probable cause to believe Coalition for a Winning Ticket and Howard Segermark, as treasurer, violated 2 U.S.C §§ 433, 434, 441d and 441b(a).

Furthermore, Free the Eagle, Inc., has made corporate contributions in connection with a federal election in violation of the Act. Therefore, the Office of the General Counsel recommends that the Commission find probable cause to believe that Free the Eagle, Inc., violated 2 U.S.C § 441b(a).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

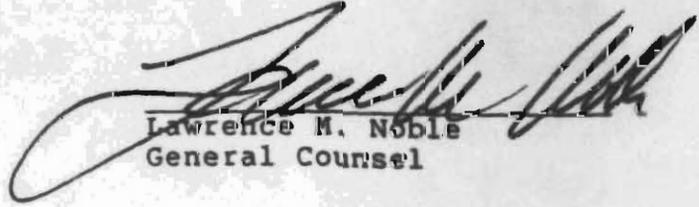
92040922657

92040922658

IV. RECOMMENDATIONS

1. Find probable cause to believe that Coalition for a Winning Ticket and Howard Segermark, as treasurer, violated 2 U.S.C §§ 433, 434, 441d, 441b(a).
2. Find probable cause to believe that Free the Eagle, Inc., violated 2 U.S.C § 441b(a).
3. Approve the attached conciliation agreements and appropriate letters.

Date 6/24/91

  
 Lawrence M. Noble  
 General Counsel

Staff assigned: Jose M. Rodriguez

Attachments:

1. CWT's Response and Document Submission of August 7, 1989
2. CWT's Response and Document Submission of January 18, 1991
3. Brief for CWT
4. FTE's letter of March 12, 1991
5. Conciliation Agreements - 2

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Coalition for a Winning Ticket ) MUR 2810  
and Howard Segermark as treasurer; )  
Free the Eagle, Inc. )

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on July 9, 1991, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2810:

1. Find probable cause to believe that Coalition for a Winning Ticket and Howard Segermark, as treasurer, violated 2 U.S.C. §§ 433, 434, 441d, and 441b(a).
2. Find probable cause to believe that Free the Eagle, Inc. violated 2 U.S.C. § 441b(a).

(continued)

92040922659

3. Approve the conciliation agreements and appropriate letters as recommended in the General Counsel's report dated June 24, 1991

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

Attest:

7/9/91  
Date

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

92040922660



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 19, 1991

Allan P. Dye, Esq.  
Webster, Chamberlain & Bean  
1747 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

RE: MUR 2810  
Coalition for a Winning Ticket  
and Howard Segermark, as  
treasurer

Dear Mr. Dye:

On July 9, 1991, the Federal Election Commission found that there is probable cause to believe your clients, Coalition for a Winning Ticket and Howard Segermark, as treasurer, violated 2 U.S.C. §§ 433, 434, 441d, and 441b(a), provisions of the Federal Election Campaign Act of 1971, as amended, in connection with Matter Under Review 2810.

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.

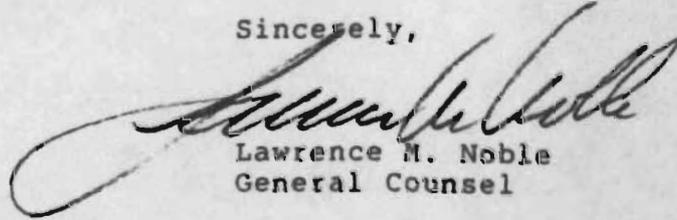
Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission within ten days. I will then recommend that the Commission accept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

92040922661

Allan P. Dye, Esq.  
Webster Chamberlain & Bean  
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 Jose M. Rodriguez, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,



Lawrence M. Noble  
General Counsel

Enclosure  
Conciliation Agreement

92040922662



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 19, 1991

Allan P. Dye, Esq.  
Webster, Chamberlain & Bean  
1747 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

RE: MUR 2810  
Free the Eagle, Inc.

Dear Mr. Dye:

On July 9, 1991, the Federal Election Commission found that there is probable cause to believe your client, Free the Eagle, Inc., violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended, in connection with Matter Under Review 2810.

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.

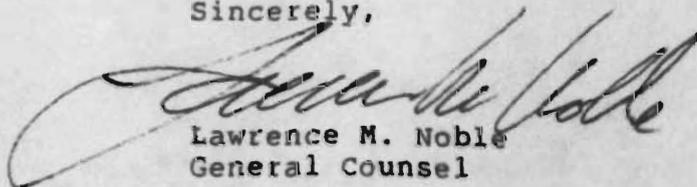
Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission within ten days. I will then recommend that the Commission accept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

92040922663

Allan P. Dye, Esq.  
Webster Chamberlain & Bean  
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 Jose M. Rodriguez, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,



Lawrence M. Noble  
General Counsel

Enclosure  
Conciliation Agreement

92040922664

06c 2278

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIN COPY ROOM

LAW OFFICES  
**WEBSTER, CHAMBERLAIN & BEAN** 91 AUG 21 PM 12:00  
1747 PENNSYLVANIA AVENUE, N. W.  
WASHINGTON, D. C. 20008  
(202) 785-9500  
FAX: (202) 835-0243

GEORGE D. WEBSTER  
J. COLEMAN BEAN  
ARTHUR L. HEROLD  
ALAN P. DYE  
EDWARD D. COLEMAN  
BURKETT VAN KIRK  
FRANK M. NORTHAM  
GERARD P. PANARO  
JOHN W. HAZARD, JR.  
CHARLES N. WATKINS  
HUGH K. WEBSTER  
ANNE B. POPE

OF COUNSEL  
CHARLES E. CHAMBERLAIN

August 20, 1991

91

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL

Jose M. Rodriguez, Esq.  
Federal Election Commission  
Washington D.C. 20463

Re: MUR~~2001~~ 2810

Dear Mr. Rodriguez:

This letter is to confirm that my clients FREE THE EAGLE, INC. and Coalition for a Winning Ticket wish to conciliate the above referenced compliance matter, but have been unable to convene all interested persons to discuss the matter, primarily because of pre-existing commitments. We will be back to you with a substantive response, probably the first week in September.

We also confirm that you have informed us that the Commission now believes that it does not have the authority to continue conciliation after 90 days.

Very truly yours

*Alan P. Dye*  
Alan P. Dye

cc: Mr. Howard Segermark

92040922665



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

October 7, 1991

Allan P. Dye, Esq.  
Webster, Chamberlain & Bean  
1747 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

RE: MUR 2810  
Coalition for A Winning Ticket and  
Howard Segermark, as treasurer  
Free the Eagle, Inc.

Dear Mr. Dye:

On July 19, 1991, you were notified that the Federal Election Commission found probable cause to believe that your clients, Coalition for A Winning Ticket and Howard Segermark, as treasurer, violated 2 U.S.C. §§ 433, 434, 441d, and 441b(a), and Free the Eagle, Inc., violated 2 U.S.C. § 441b(a). On that same date, you were sent conciliation agreements offered by the Commission in settlement of this matter.

Please note that pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), the conciliation period in this matter may not extend for more than 90 days, but may cease after 30 days. Insofar as more than 30 days have elapsed without a response from you, a recommendation concerning the filing of a civil suit will be made to the Commission by the Office of the General Counsel unless we receive a response from you within ten days from receipts of this letter.

Should you have any questions, please contact Jose M. Rodriguez, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble  
General Counsel

BY: Jonathan Bernstein  
Assistant General Counsel

920409222666

# FREE THE EAGLE

... A Grassroots Citizens Lobby

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIL ROOM

Mar 26 11 06 AM '92

March 25, 1992

Mr. Jose Rodriguez  
Attorney  
Federal Election Commission  
Office Of The General Counsel  
999 E Street, N.W.  
Washington, D.C. 20463

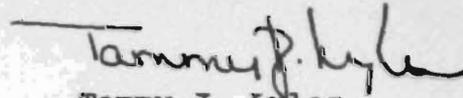
RE: MUR 2810  
Free The Eagle, Inc.

Dear Mr. Rodriguez:

This letter is to inform you that Mr. Alan P. Dye, Esq., is no longer representing Free The Eagle on MUR 2810.

Our newly appointed counsel is Mr. K. Randall Pearson. For this reason, I have enclosed Statement of Designation of Counsel. If I can be of further assistance to you, please do not hesitate to contact me.

Sincerely,



Tammy J. Lyles  
Managing Director

92 MAR 26 PM 1:49

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF THE GENERAL COUNSEL

92040922667

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2810

NAME OF COUNSEL: Mr. K. Randall Pearson

ADDRESS: 1 Mass., Ave., N.W.

Suite 820

Washington, DC 20001

TELEPHONE: (202) 289-7519

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.

3/25/92  
Date

Tammy J. Lyles  
Signature Tammy J. Lyles  
Managing Director

RESPONDENT'S NAME: Free The Eagle, Inc.

ADDRESS: 666 Pennsylvania Avenue

Suite 300

Washington, DC 20003

HOME PHONE: N/A

BUSINESS PHONE: (202) 543-6090

92040922668



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 8, 1992

VIA HAND DELIVERY

K. Randall Pearson, Esq.  
1 Massachusetts Avenue, N.W.  
Suite 820  
Washington, D.C. 20001

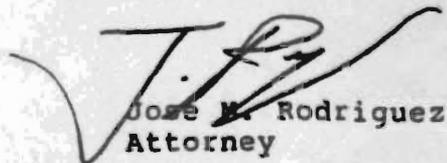
RE: MUR 2810

Dear Mr. Pearson:

Since our conversation on April 6, 1992, I have been attempting, without success, to contact you to arrange a mutually convenient time for us to discuss this matter. I propose meeting on Friday, April 10, 1992, at 2:00 in the afternoon at the Commission's Office.

Please contact me upon receipt of this letter to confirm this arrangement, at (202) 219-3690.

Sincerely

  
Jose M. Rodriguez  
Attorney

92040922669

# FREE THE EAGLE

... A Grassroots Citizens Lobby

VIA FAX

No. 219-3923

April 9, 1992

Mr. Jose Rodriguez  
Attorney  
Federal Election Commission  
Office Of The General Counsel  
999 E Street, N.W.  
Washington, D.C. 20463

RE: MUR 2810  
Free The Eagle, Inc.  
Coalition for a Winning Ticket

Dear Mr. Rodriguez:

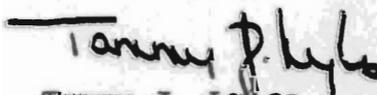
This letter is to inform you that Mr. Alan P. Dye, Esq., is no longer representing Free The Eagle, Inc./Coalition for a Winning Ticket on MUR 2810.

Our newly appointed counsel is Mr. K. Randall Pearson. For this reason, I have enclosed Statement of Designation of Counsel.

Please note, on our Statement of Designation of Counsel dated March 25th, (copy enclosed) the phone number which appears for Mr. Pearson (289-7519) is his FAX number. Mr. Pearson's office number is (202) 289-3835. I apologize for any inconvenience this might have caused you.

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

Sincerely,



Tammy J. Lyles  
Managing Director

APR 14 1 56 PM '92  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF THE GENERAL COUNSEL  
92 APR 15 AM 9:08

92040922670

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2810  
Coalition for a Winning Ticket

NAME OF COUNSEL: Mr. K. Randall Pearson

ADDRESS: One Massachusetts Avenue, N.W.

Suite 820

Washington, DC 20001

TELEPHONE: (202) 289-3835

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.

April 9, 1992  
Date

Tammy P. Lyle  
Signature

RESPONDENT'S NAME: Free The Eagle, Inc.

ADDRESS: 666 Pennsylvania Ave., S.E.

Suite 300

Washington, DC 20003

HOME PHONE: N/A

BUSINESS PHONE: (202) 543-6090

92040922671

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2810  
Coalition for a Winning Ticket

NAME OF COUNSEL: Mr. K. Randall Pearson  
ADDRESS: One Massachusetts Ave., N.W.  
Suite 820  
Washington, DC 20001  
TELEPHONE: (202) 289-3835

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.

April 14, 1992  
Date

Tammy J. [Signature]  
Signature

RESPONDENT'S NAME: Coalition for a Winning Ticket  
ADDRESS: 666 Pennsylvania Ave., S.E.  
Suite 300  
Washington, DC 20003  
HOME PHONE: N/A  
BUSINESS PHONE: (202) 543-6090

92040922672

**K. Randall Pearson**

*Attorney at Law*

One Massachusetts Avenue, N.W.

Suite 820

Washington, D.C. 20001

OGC 4587

Telephone: (202) 289-7533

Telecopier: (202) 289-7533

April 23, 1992

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
APR 23 PM 5:31

Jose M. Rodriguez, Esq.  
Attorney  
Office of the General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

RE: MUR 2810  
Coalition For A Winning Ticket/Free The Eagle

Dear Mr. Rodriguez:

Pursuant to your request at our recent meeting, please find enclosed: (1) the financial statements for Free The Eagle as of the close of calendar year 1991; and (2) bank statements for the Coalition For A Winning Ticket checking account from April 30, 1991 through March 31, 1992.

I will await subsequent communication from your office regarding the conciliation of this matter.

Sincerely,

*Kim R. Pearson*

Kim R. Pearson

Enclosures

92040922673

ASSETS

Current Assets		
Cash	13,059.94	
TRUST ACCOUNT (TAMMY-TRUSTEE)	14,917.39	
Prepaid Accounts	4,561.15	
FREPAID EXPENSES - GENERAL	10,352.30	
A/R General	2,139.07	
A/R Target	35,083.90	
A/R Visa	-6,983.46	
N/R General	-55,355.77	
A/R Mozambique	22,355.77	
DEFERRED COSTS	25,179.71	
	-----	65,510.00
Total Current Assets		
Fixed Assets		
Furniture and Fixtures	51,731.52	
Office Equipment	65,481.23	
Computers	159,011.60	
Less Accumulated Depreciation	-116,235.04	
	-----	160,789.31
Total Fixed Assets		
Other Assets		
Cash Held on Deposit	3,365.00	
	-----	3,365.00
		-----
TOTAL ASSETS		4229,664.31
		=====

LIABILITIES & FUND BALANCE

Liabilities		
Accounts Payable - General	563,302.70	
A/P - Howard J. Ruff loan	-167,965.33	
Payroll Taxes Payable	1,466.74	
ACCRUED PAYROLL	12,434.89	
ACCRUED PAYROLL TAXES	2,378.08	
DEFERRED REVENUES	162.00	
	-----	411,779.08
Total Liabilities		
Fund Balance		
Prior Year Fund Balance	106,317.14	
Current Year Fund Balance	-318,431.91	
	-----	-212,114.77
Total Fund Balance		
		-----
TOTAL LIABILITIES & FUND BAL.		419,664.31
		=====

RECEIVED  
 FEDERAL ELECTION COMMISSION  
 OFFICE OF GENERAL COUNSEL  
 92 APR 23 PM 5:32

92040922674

Free the Eagle  
 REVENUES AND EXPENSES - SHORT FORM  
 01-01-91 - 12-31-91

BANK CHARGES & VISA INTEREST 1,933.83  
 W/C DISCOUNT FEES 0.00

1,933.83

DEPRECIATION, TAXES & LICENSES  
 DEPRECIATION EXPENSE 0.00  
 TAXES AND LICENSES 103,314.49

103,314.49

STATE OF THE NATION EXPENSES  
 SOTN - PRINTING 0.00  
 SOTN - POSTAGE 0.00  
 SOTN - MISCELLANEOUS 0.00

0.00

OFFICE EXPENSES  
 OFFICE EXPENSE 4,100.58  
 TELEPHONE EXPENSE 11,757.09  
 DUES-MEMBERSHIPS-SUBSCRIPTIONS 331.65  
 PRINTING EXPENSE 697.48  
 POSTAGE AND SHIPPING EXPENSE 5,248.33  
 REPAIR/MAINT OFFICE EQUIPMENT 4,347.49  
 INSURANCE - PROPERTY 945.14  
 INSURANCE - DIRECTORS 6,314.32  
 LIST RENTAL EXPENSE 3,230.56  
 LIST MAINTENANCE EXPENSE 16,192.52

53,165.16

OTHER EXPENSES  
 Miscellaneous Expenses 5,250.12  
 OTHER EXPENSES 76.50

5,326.62

TOTAL EXPENSES

413,759.09

EXCESS OF REVENUE OVER EXPENSE

-192,353.83

92040922675

	368,837.37	
TOTAL REVENUE	-----	368,837.37
	147,432.11	
TOTAL COST OF APPEALS	-----	147,432.11
GROSS MARGIN		-----
		221,405.26

EXPENSES

LABOR AND BENEFITS

LABOR - SALARIES/WAGES	122,483.62
LABOR BENEFITS	13,353.18
TAXES - PAYROLL	10,544.78
CONSULTING - HOWARD SEGERMARK	52,491.78
INTEREST-HOWARD SEGERMARK	282.93
CONSULTING - K. ARRIAGA	0.00
CONSULTING - KENNETH TROTTER	0.00
CONSULTING - HUEH F. WELTON	0.00
CONSULTING - DAVID CHERRINGTON	0.00
CONSULTING - KRISTEN L. EGBERT	0.00
CONSULTING - KIMBERLY A WILSON	0.00
NATHANIEL J. SIMS	0.00

-----  
 199,156.29

PROFESSIONAL FEES

CONSULTING - MISCELLANEOUS	0.00
CONSULTING - MCQUIRE ASSOCIATE	420.00
Consulting T. Lyles	6,500.00
PROFESSIONAL FEES	27,739.10
CONTRIBUTIONS AND/OR GIFTS	0.00

-----  
 34,659.10

LEASE EXPENSES

LEASE EXPENSE - PROPERTY	14,681.68
LEASE EXPENSE - OFFICE EQUIP.	464.91

-----  
 15,146.49

TRAVEL EXPENSES

TRAVEL EXPENSE	665.32
AUTOMOBILE EXPENSE/REPAIRS	0.00
ENTERTAINMENT EXPENSE	303.53
SEMINARS AND CONVENTIONS	88.26

-----  
 1,057.11

BANK CHARGES AND DISCOUNT FEES

92040922676



555 NEW JERSEY AVE., N.W.  
 WASHINGTON, D.C. 20001  
 (202) 626-0500

COALITION FOR A WINNING TICKET  
 SUITE 300  
 666 PENNSYLVANIA AVENUE, SE  
 WASHINGTON, DC 20003

CUSTOMER NUMBER	PAGE NUMBER
1-012088-00	1
02-28-92	03-31-92
FROM	TO

STATEMENT PERIOD  
 FOR STATEMENT ERRORS  
 DIRECT INQUIRIES TO BOOKKEEPING DEPARTMENT  
 555 NEW JERSEY AVE., N.W. - WASHINGTON, D.C. 20001  
 (202) 626-0500

ACCOUNT NUMBER	BALANCE FORWARD	TOTAL CREDITS		TOTAL DEBITS		FEE	CLOSING BALANCE
		NUMBER	AMOUNT	NUMBER	AMOUNT		
01 CHECKING	330.70	0	0.00	0	0.00	0.00	330.70
01 CHECKING		AVERAGE BALANCE		AVERAGE COLLECTED BALANCE			
		330.70					330.70

92040922677

NUMBER OF ENCLOSURES

U



**FEDERAL CITY**  
NATIONAL BANK

555 NEW JERSEY AVE., N.W.  
WASHINGTON, D.C. 20001  
(202) 626-0500

RECEIVED MAR - 4 1992

COALITION FOR A WINNING TICKET  
SUITE 300  
666 PENNSYLVANIA AVENUE, SE  
WASHINGTON, DC 20003

CUSTOMER NUMBER	PAGE NUMBER
1-012088-00	1
01-31-92 FROM	02-28-92 TO

STATEMENT PERIOD  
FOR STATEMENT ERRORS  
DIRECT INQUIRIES TO BOOKKEEPING DEPARTMENT  
555 NEW JERSEY AVE., N.W., WASHINGTON, D.C. 20001  
(202) 626-0500

ACCOUNT NUMBER	BALANCE FORWARD	TOTAL CREDITS		TOTAL DEBITS		FEE	CLOSING BALANCE
		NUMBER	AMOUNT	NUMBER	AMOUNT		
01 CHECKNG	330.70	0	0.00	0	0.00	0.00	330.70
01 CHECKING		AVERAGE BALANCE		AVERAGE COLLECTED BALANCE			
		330.70					330.70

92040922678

NUMBER OF ENCLOSURES

0



**FEDERAL CITY  
NATIONAL BANK**

555 NEW JERSEY AVE., N.W.  
WASHINGTON, D.C. 20001  
(202) 626-0500

COALITION FOR A WINNING TICKET  
SUITE 300  
655 PENNSYLVANIA AVENUE, SE  
WASHINGTON, DC 20003

CUSTOMER NUMBER	PAGE NUMBER
1-012099-07	1
12-31-91 <small>FROM</small>	01-31-92 <small>TO</small>

**FOR STATEMENT ERRORS**  
DIRECT INQUIRIES TO BOOKKEEPING DEPARTMENT  
555 NEW JERSEY AVE., N.W. WASHINGTON, D.C. 20001  
(202) 626-0500

ACCOUNT NUMBER	BALANCE FORWARD	TOTAL CREDITS		TOTAL DEBITS		FEE	CLOSING BALANCE
		NUMBER	AMOUNT	NUMBER	AMOUNT		
01 CHECKING	330.70	0	0.00	0	0.00	0.00	330.70
01 CHECKING							
AVERAGE BALANCE		330.70		AVERAGE COLLECTED BALANCE			330.70

92040922679

NUMBER OF ENCLOSURES

0



555 NEW JERSEY AVE., N.W.  
 WASHINGTON, D.C. 20001  
 (202) 626-0500

COALITION FOR A WINNING TICKET  
 SUITE 300  
 666 PENNSYLVANIA AVENUE, SE  
 WASHINGTON, DC 20003

CUSTOMER NUMBER	PAGE NUMBER
1-012088-00	1
11-29-91	12-31-91
FROM	TO

STATEMENT PERIOD  
 FOR STATEMENT ERRORS  
 DIRECT INQUIRIES TO BOOKKEEPING DEPARTMENT  
 555 NEW JERSEY AVE., N.W. - WASHINGTON, D.C. 20001  
 (202) 626-0500

ACCOUNT NUMBER	BALANCE FORWARD	TOTAL CREDITS		TOTAL DEBITS		FEE	CLOSING BALANCE
		NUMBER	AMOUNT	NUMBER	AMOUNT		
01 CHECKING	330.70	0	0.00	0	0.00	0.00	330.70
01 CHECKING							
AVERAGE BALANCE	330.70			AVERAGE COLLECTED BALANCE			330.70

92040922680

NUMBER OF ENCLOSURES

0



**FEDERAL CITY**  
NATIONAL BANK

555 NEW JERSEY AVE., N.W.  
WASHINGTON, D.C. 20001  
(202) 626-0500

COALITION FOR A WINNING TICKET  
SUITE 300  
666 PENNSYLVANIA AVENUE, SE  
WASHINGTON, DC 20003

CUSTOMER NUMBER	PAGE NUMBER
1-012088-00	1
10-31-91	11-29-91
FROM	TO

STATEMENT PERIOD  
~~FOR STATEMENT ERRORS~~  
DIRECT INQUIRIES TO BOOKKEEPING DEPARTMENT  
555 NEW JERSEY AVE., N.W. - WASHINGTON, D.C. 20001  
(202) 626-0500

ACCOUNT NUMBER	BALANCE FORWARD	TOTAL CREDITS		TOTAL DEBITS		FEE	CLOSING BALANCE
		NUMBER	AMOUNT	NUMBER	AMOUNT		
01 CHECKING	330.70	0	0.00	0	0.00	0.00	330.70
-----							
01 CHECKING							
AVERAGE BALANCE	330.70		AVERAGE COLLECTED BALANCE				330.70
-----							

92040922681

FEDERAL CITY NATIONAL BANK  
IS A MEMBER OF FDIC  
AND EACH DEPOSITOR IS INSURED  
BY THE FDIC UP TO \$100,000

NUMBER OF ENCLOSURES

0



**FEDERAL CITY  
NATIONAL BANK**

555 NEW JERSEY AVE. N.W.  
WASHINGTON, D.C. 20001  
(202) 626-0500

COALITION FOR A WINNING TICKET  
SUITE 300  
666 PENNSYLVANIA AVENUE, SE  
WASHINGTON, DC 20003

CUSTOMER NUMBER	PAGE NUMBER
1-012088-00	1
09-30-91	10-31-91
FROM	TO

STATEMENT PERIOD  
**FOR STATEMENT ERRORS—**  
DIRECT INQUIRIES TO BOOKKEEPING DEPARTMENT  
555 NEW JERSEY AVE., N.W., WASHINGTON, D.C. 20001  
(202) 626-0500

ACCOUNT NUMBER	BALANCE FORWARD	TOTAL CREDITS		TOTAL DEBITS		FEE	CLOSING BALANCE
		NUMBER	AMOUNT	NUMBER	AMOUNT		
01 CHECKNG	330.70	0	0.00	0	0.00	0.00	330.70
01 CHECKING							
AVERAGE BALANCE	330.70			AVERAGE COLLECTED BALANCE			330.70

92040922682

NUMBER OF ENCLOSURES

0



**FEDERAL CITY**  
NATIONAL BANK

555 NEW JERSEY AVE.  
WASHINGTON, D.C. 20001  
(202) 626-0500

COALITION FOR A WINNING TICKET  
SUITE 300  
666 PENNSYLVANIA AVENUE, SE  
WASHINGTON, DC 20003

CUSTOMER NUMBER	PAGE NUMBER
1-012088-00	1
08-30-91	09-30-91
FROM	TO

STATEMENT PERIOD  
--FOR STATEMENT ERRORS--  
DIRECT INQUIRIES TO BOOKKEEPING DEPARTMENT  
555 NEW JERSEY AVE., N.W. - WASHINGTON, D.C. 20001  
(202) 626-0500

ACCOUNT NUMBER	BALANCE FORWARD	TOTAL CREDITS		TOTAL DEBITS		FEE	CLOSING BALANCE
		NUMBER	AMOUNT	NUMBER	AMOUNT		
01 CHECKING	330.70	0	0.00	0	0.00	0.00	330.70
01 CHECKING							
AVERAGE BALANCE	330.70			AVERAGE COLLECTED BALANCE			330.70

92040922683



**FEDERAL CITY  
NATIONAL BANK**

555 NEW JERSEY AVE., N.W.  
WASHINGTON, D.C. 20001  
(202) 626-0500

COALITION FOR A WINNING TICKET  
25 E STREET, N.W., SUITE 800  
WASHINGTON, D.C. 20001

CUSTOMER NUMBER	PAGE NUMBER
1-012088-00	1
06-28-91 <small>FROM</small>	07-31-91 <small>TO</small>

STATEMENT PERIOD  
**FOR STATEMENT ERRORS**  
DIRECT INQUIRIES TO BOOKKEEPING DEPARTMENT  
555 NEW JERSEY AVE., N.W. - WASHINGTON, D.C. 20001  
(202) 626-0500

ACCOUNT NUMBER	BALANCE FORWARD	TOTAL CREDITS		TOTAL DEBITS		FEE	CLOSING BALANCE
		NUMBER	AMOUNT	NUMBER	AMOUNT		
01 CHECKNG	830.70	0	0.00	1	500.00	0.00	330.70

01 CHECKING	AVERAGE BALANCE	391.31	AVERAGE COLLECTED BALANCE	391.31
CHECK DATE	AMOUNT	CHECK DATE	AMOUNT	DAILY BALANCE
07-02	500.00	07-02		330.70

92040922684

NUMBER OF ENCLOSURES

1

NAME Coalition for a Winning Ticket

ACCOUNT NO. 01-01208801

June 27 1991 15-157  
540

PAY TO THE ORDER OF *Western Maryland Bank* \$ *500.00*

*Five Hundred* DOLLARS

FEDERAL CITY NATIONAL BANK  
Washington, D.C. 20001

MEMO RE: *ALAN DYE* *A. Dye for W. Md. Bank*

⑆054001576⑆ 0101208801⑆ ⑆0000050000⑆

92040922685



**FEDERAL CITY  
NATIONAL BANK**

555 NEW JERSEY AVE., N.W.  
WASHINGTON, D.C. 20001  
(202) 626-0500

COALITION FOR A WINNING TICKET  
25 E STREET, N.W., SUITE 800  
WASHINGTON, D.C. 20001

CUSTOMER NUMBER	PAGE NUMBER
1-012088-00	1
04-30-91	05-31-91
FROM	TO

STATEMENT PERIOD  
—FOR STATEMENT ERRORS—  
DIRECT INQUIRIES TO BOOKKEEPING DEPARTMENT  
555 NEW JERSEY AVE., N.W. - WASHINGTON, D.C. 20001  
(202) 626-0500

ACCOUNT NUMBER	BALANCE FORWARD	TOTAL CREDITS		TOTAL DEBITS		FEE	CLOSING BALANCE
		NUMBER	AMOUNT	NUMBER	AMOUNT		
01 CHECKING	830.70	0	0.00	0	0.00	0.00	830.70
01 CHECKING		830.70		AVERAGE COLLECTED BALANCE			830.70

92040922686

\*\*\*NOTICE OF INTEREST RATE CHANGE\*\*\*  
EFFECTIVE JULY 16, 1991 THE FOLLOWING  
RATES WILL CHANGE AS INDICATED  
MONEY MARKET RATE 5.50% APY 5.6536%  
SUPER NOW RATE 5.40% APY 5.5480%

NUMBER OF ENCLOSURES

0

# FREE THE EAGLE

... A Grassroots Citizens Lobby

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIL ROOM

MAY 4 11 15 AM '92

May 1, 1992

Jose M. Rodriguez, Esq.  
Office of the General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, DC 20463

RE: MUR 2810  
Coalition For A Winning Ticket/Free The Eagle

Dear Mr. Rodriguez:

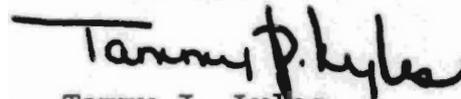
As Mr. Howard Segermark is no longer an Officer of Free The Eagle, he is no longer an authorized signatory on any financial account held under the name of Free The Eagle or any affiliated entity of Free The Eagle.

Hence, Mr. Segermark is no longer authorized to disburse monies from the account of Coalition For A Winning Ticket (CWT). Mr. Kim Pearson, an Assistant Secretary of Free The Eagle, is now authorized to sign checks drawn on this account.

Therefore, please substitute Mr. Pearson's name in MUR 2810 as the Treasurer of Coalition For a Winning Ticket. If a conciliation agreement is reached between the FEC and CWT, Mr. Pearson will be the signatory for CWT.

If you have any questions, please do not hesitate to call me.

Sincerely,



Tammy J. Lyles  
Managing Director

cc: Howard Segermark  
K. Randall Pearson

Phone: (202) 543-6090  
FAX: (202) 543-6884

666 Pennsylvania Avenue, S.E., Suite 300  
Washington, D.C. 20003

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF THE GENERAL COUNSEL  
92 MAY -4 PM 3:35

92040922687

**K. Randall Pearson**

*Attorney at Law*

One Massachusetts Avenue, N.W.

Suite 820

Washington, D.C. 20001

Telephone: (202) 289-~~7521~~<sup>3835</sup>  
Telecopier: (202) 289-7519

*GCC #5050*

June 29, 1992

Jose M. Rodriguez, Esq.  
Attorney  
Office of the General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

RE: MUR 2810  
Coalition For A Winning Ticket/Free The Eagle, Inc.

Dear Mr. Rodriguez:

Please find enclosed two executed conciliation agreements proposed by your office in settlement of the above-described matter.

Please forward a copy of each conciliation agreement to me after the agreements have been executed by Mr. Noble and approved by the Commission.

If you have any questions, please do not hesitate to call me.

Sincerely,

*K.R. Pearson*

Kim R. Pearson

cc: Tammy J. Lyles

92040922688

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
92 JUL -5 PM 4:20

RECEIVED  
JUL 15 1973

BEFORE THE FEDERAL ELECTION COMMISSION

JUL 15 1973 27

In the Matter of )  
 )  
Coalition for A Winning Ticket and )  
Kim R. Pearson, as treasurer )  
Free the Eagle, Inc. )

**SENSITIVE**

MUR 2810

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached are two conciliation agreements which have been signed by Kim R. Pearson, treasurer of Coalition for a Winning Ticket ("CWT") and assistant secretary of Free the Eagle, Inc., ("FTE").

92040922689

92040922690

92040922691

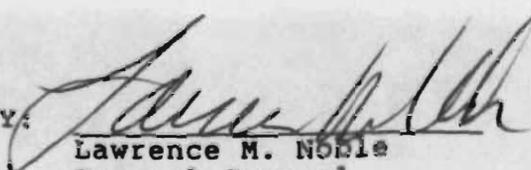
920409222692

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Coalition for a Winning Ticket and Kim R. Pearson, as treasurer.
2. Accept the attached conciliation agreement with Free the Eagle, Inc.
3. Close the file.

4. Approve the appropriate letters.

Date 7/15/92

BY:   
Lawrence M. Noble  
General Counsel

Attachments

1. CWT's Conciliation Agreement.
2. FTE's Conciliation Agreement.
3. Ms. Lyles' communication of May 1, 1992.
4. Mr. Pearson's communication of April 23, 1992.
5. Copy of civil penalty check.

Staff Assigned: Jose M. Rodriguez

92040922693

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Coalition for A Winning Ticket ) MUR 2810  
and Kim R. Pearson, as treasurer; )  
Free the Eagle, Inc. )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 22, 1992, the Commission decided by a vote of 4-0 to take the following actions in MUR 2810:

1. Accept the conciliation agreement with Coalition for a Winning Ticket and Kim R. Pearson, as treasurer, as recommended in the General Counsel's Report dated July 15, 1992.
2. Accept the conciliation agreement with Free the Eagle, Inc., as recommended in the General Counsel's Report dated July 15, 1992.

(Continued)

92040922694

3. Close the file.
4. Approve the appropriate letters, as recommended in the General Counsel's Report dated July 15, 1992.

Commissioners Elliott, McDonald, McGarry and Thomas voted affirmatively for the decision; Commissioners Aikens and Potter did not cast votes.

Attest:

92040922695  
July 22, 1992  
Date

  
*Marjorie W. Emons*  
Marjorie W. Emons  
Secretary of the Commission

Received in the Secretariat: Wed., July 15, 1992 12:27 p.m.  
Circulated to the Commission: Wed., July 15, 1992 4:00 p.m.  
Deadline for vote: Wed., July 22, 1992 4:00 p.m.

dr



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**CLOSED**

July 29, 1992

Kim R. Pearson, Treasurer  
One Massachusetts Avenue, N.W.  
Suite 820  
Washington, D.C. 20001

RE: MUR 2810  
Coalition for a Winning Ticket and  
Kim R. Pearson, as treasurer

Dear Mr. Pearson:

On July 22, 1992, the Federal Election Commission accepted the signed conciliation agreement submitted on the Committee's and your behalf in settlement of violations of 2 U.S.C. §§ 433, 434, 441d, and 441b(a), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Accordingly, the file has been closed in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

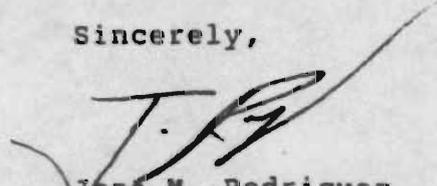
Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

92040922696

Kim R. Pearson, Treasurer  
Coalition for a Winning Ticket  
Page 2

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the balance of the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact me at (202) 219-3690.

Sincerely,



José M. Rodriguez  
Attorney

Enclosure  
Conciliation Agreement

92040922697

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Coalition for a Winning Ticket ) MUR 2810  
and Kim R. Pearson, 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 Coalition for a Winning Ticket and its treasurer ("Respondents") violated 2 U.S.C. §§ 433, 434, 441d, and 441b(a).

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 this matter.
- III. Respondents enter voluntarily into this agreement with the Commission.
- IV. The pertinent facts in this matter are as follows:
  1. Coalition for a Winning Ticket ("CWT") was a coalition of conservative Republicans formed on July 25, 1988, following a meeting held by Sen. Gordon Humphrey.
  2. CWT, comprised of some twenty-four member organizations, had an operating budget of over \$30,000.

92040922698

3. CWT was only active during the period of the 1988 Republican National Convention, approximately July 20 through August 16, 1988, and is no longer in existence.

4. The CWT's executive committee members included Sen. Humphrey, Dan Perrin, and Howard Segermark (Chairman, Executive Director, and Chief Financial Officer, respectively).

5. Free the Eagle, Inc., ("FTE") is a corporation which was involved in CWT's activities.

6. Howard Segermark was the managing director of Free the Eagle, Inc., at the time of the violations. Tammy J. Lyles is presently the managing director of Free the Eagle, Inc.

7. CWT sent out two separate mass mailings in its efforts to influence the Republican nomination for Vice President at the 1988 Republican National Convention, a federal election pursuant to 2 U.S.C. § 431(1) and (2).

8. The first mailing, dated August 1, 1988, was directed at the delegates to the Republican National Convention attempting to encourage their support for a conservative vice-presidential nominee. It advanced CWT's purpose of communicating to the Vice President the need to have a conservative candidate as a vice-presidential nominee and of planning delegate and non-delegate strategy meetings, press conferences, and Convention floor activities. The mailing included a reply form urging delegates to join CWT and soliciting an optional \$100 membership fee.

9. This first mailing consisted of 4,946 distributions at a cost of \$1,591.20.

92040922699

10. The second mailing was directed at the general public, encouraging support for CWT's purpose of convincing the Vice President to pick a conservative running mate in order to defeat Michael Dukakis and its plans to hold strategy meetings with delegates and non-delegates at the Convention. This mailing solicited contributions, minimum of \$250, from the general public in order to satisfy CWT's proposed budget of \$50,000.

11. This second mailing consisted of 4,804 distributions at a cost of \$3,666.68.

12. The costs associated with the mass mailings total \$5,257.88.

13. Also in relation to its campaign to influence the the Republican nomination for Vice President at the 1988 Republican National Convention, CWT secured office space in both Washington, D.C., and New Orleans, hired support staff, held meetings and engaged in convention activities.

14. CWT raised approximately \$36,000 as of December 31, 1988, in order to finance its activities. Some of these funds, totaling at least \$3,666.68, came directly from FTE in early August to help CWT pay for the mailings described in paragraph nine (9). FTE also paid vendors at least \$15,582.13 on CWT's behalf. This amount included payments of \$2,510.88 for phone service (\$1,028.88 at the Washington, D.C., office and \$1,482.00 at the New Orleans office), \$2,800 for rent for the New Orleans office, with the balance going towards numerous other expenses including, but not limited to, travel, food, printing, couriers, and office supplies.

92040922700

15. From all funds raised, CWT reimbursed FTE the \$15,582.13 paid to vendors on its behalf.

16. Respondents expended approximately \$33,162.17 for the purpose of influencing a federal election.

17. Respondents, by direct mail, solicited funds for the purpose of influencing a federal election and expressly advocated the defeat of a clearly identified candidate, Michael Dukakis.

18. Respondents knowingly accepted advances totaling at least 3,666.68 from FTE.

19. Respondents knowingly accepted at least \$15,582.13 from FTE in direct payments to vendors on CWT's behalf.

20. CWT was a political committee within the meaning of 2 U.S.C. § 431(4), and Howard Segermark acted as the treasurer of CWT at the time of the violations. Kim R. Pearson is presently acting as treasurer of CWT.

21. Respondents did not register with the Federal Election Commission as a political committee under the Act.

22. Respondents did not file reports of receipts and disbursements, disclosing CWT's activities, with the Federal Election Commission.

23. Respondents failed to provide a disclaimer for the mass mailings.

V. 1. a. A political committee is defined to include any committee that accepts or spends in excess of \$1,000 in a calendar year for the purpose of influencing a federal election. See 2 U.S.C. § 431(4)(A). Pursuant to 2 U.S.C. § 433, each political committee must register by filing a Statement of Organization

92040922701

within ten days after becoming a political committee.

b. By making the expenditures listed at paragraph IV, for the purpose of influencing a federal election, Coalition for a Winning Ticket was a political committee within the meaning of 2 U.S.C. § 431(4)(A). Respondents, however, failed to file a Statement of Organization, in violation of 2 U.S.C. § 433.

2. a. Pursuant to 2 U.S.C. § 434, a political committee is required to file reports of receipts and disbursements.

b. Coalition for a Winning Ticket was a political committee within the meaning of 2 U.S.C. § 431(4)(A). Respondents, however, failed to file reports of receipts and disbursements, in violation of 2 U.S.C. § 434.

3. a. Pursuant to 2 U.S.C. § 441b(a), it is unlawful for any corporation to make a contribution in connection with a federal election, or for any political committee to knowingly accept or receive such a contribution.

b. Respondents knowingly accepted and received at least \$19,248.81 in corporate contributions, in violation of 2 U.S.C. § 441b(a).

4. a. Pursuant to 2 U.S.C. § 441d, whenever any person makes an expenditure for the financing of communications expressly advocating the election or defeat of a clearly identified candidate or solicits any contribution through direct mail, the communication shall contain a disclaimer.

b. Respondents made expenditures to finance communications, through direct mail, which expressly advocated the defeat of presidential candidate Michael Dukakis, and solicited

92040922702

contributions from the general public, without providing a disclaimer, in violation of 2 U.S.C. § 441d.

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Three Thousand Five Hundred Dollars (\$3,500), 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.

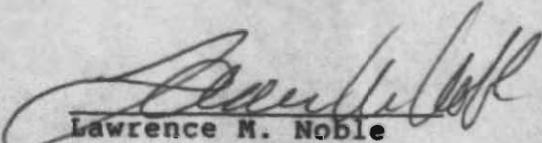
VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

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.

92040922703

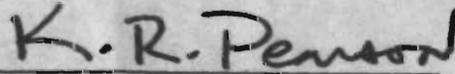
X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

  
Lawrence M. Noble  
General Counsel

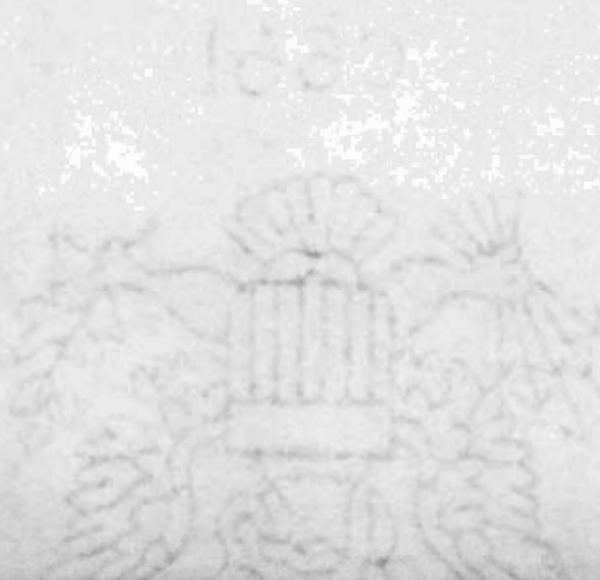
7/28/92  
Date

FOR THE RESPONDENTS:

  
Name: Kim R. Pearson  
Position: Treasurer

June 29, 1992  
Date

92040922704





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 29, 1992

Kim R. Pearson, Assistant Secretary  
One Massachusetts Avenue, N.W.  
Suite 820  
Washington, D.C. 20001

RE: MUR 2810  
Free the Eagle, Inc.

Dear Mr. Pearson:

On July 22, 1992, the Federal Election Commission accepted the signed conciliation agreement submitted on Free the Eagle's behalf in settlement of a violation of 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). Accordingly, the file has been closed in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

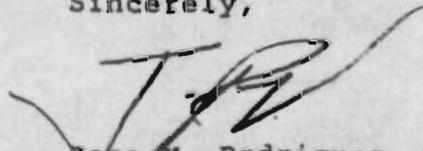
Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

92040922705

Kim R. Pearson, Assistant Secretary  
Free the Eagle, Inc.  
Page 2

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact me at (202) 219-3690.

Sincerely,



Jose M. Rodriguez  
Attorney

Enclosure  
Conciliation Agreement

92040922706

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of  
Free the Eagle, Inc.

)  
)  
) MUR 2810

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 Free the Eagle, Inc., ("Respondent") violated 2 U.S.C. § 441b(a).

NOW, THEREFORE, the Commission and the Respondent, 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 Respondent and the subject matter of this proceeding.
- II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.
- III. Respondent enters voluntarily into this agreement with the Commission.
- IV. The pertinent facts in this matter are as follows:
  - 1. Free the Eagle, Inc., is a non-profit corporation.
  - 2. Howard Segermark was the managing director of Free the Eagle, Inc., during the time of the violations. Tammy J. Lyles is the present managing director of Free the Eagle, Inc.
  - 3. Coalition for a Winning Ticket ("CWT") was a political committee within the meaning of 2 U.S.C. § 431(4).

92040922707

4. Respondent advanced CWT at least \$3,666.68.

5. Respondent paid vendors at least \$15,582.13 on CWT's behalf. This amount included payments of \$2,510.88 for phone services (\$1,028.88 at the Washington, D.C., office and \$1,482.00 at the New Orleans office), \$2,800 for rent for the New Orleans office, with the balance going towards numerous other expenses including, but not limited to, travel, food printing, couriers, and office supplies.

6. Respondent was reimbursed by CWT the \$15,582.13 paid to vendors on its behalf.

7. Respondent made at least \$19,248.81 in contributions to CWT.

V. a. Pursuant to 2 U.S.C. § 441b(a), it is unlawful for any corporation to make a contribution in connection with any federal election, or for any political committee to knowingly accept or receive such a contribution.

b. Respondent knowingly made at least \$19,248.81 in corporate contributions, in violation of 2 U.S.C. § 441b(a).

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of Two Thousand Five Hundred Dollars (\$2,500), 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

92040922708

relief in the United States District Court for the District of Columbia.

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

*Lawrence M. Noble*

Lawrence M. Noble  
General Counsel

7/28/92  
Date

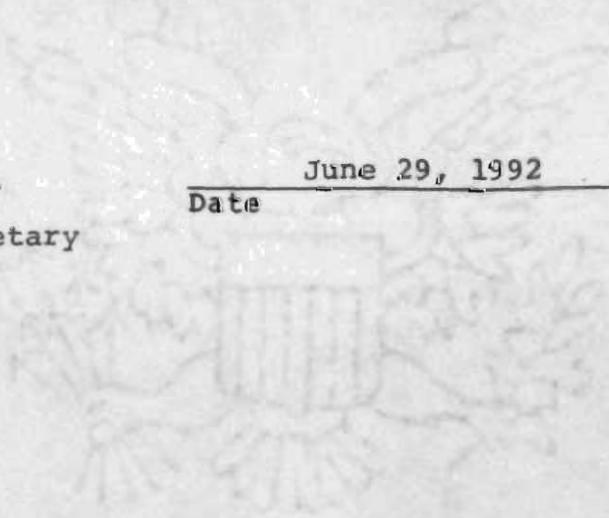
FOR THE RESPONDENT:

*Kim R. Pearson*

Name: Kim R. Pearson  
Position: Assistant Secretary

June 29, 1992  
Date

92040922709



OGC 3398

# TRANSCRIPT OF PROCEEDINGS

UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ELECTION COMMISSION

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
89 JUL 13 PM 11:39

----- -X  
In the Matter of: :  
M U R 2810 :  
----- -X

DEPOSITION OF HOWARD SEGERMARK

92040922710

Washington, D. C.

Wednesday, June 28, 1989

ACE-FEDERAL REPORTERS, INC.  
*Stenotype Reporters*  
444 North Capitol Street  
Washington, D.C. 20001  
(202) 347-3700  
Nationwide Coverage  
800-336-6646

THE UNITED STATES OF AMERICA  
BEFORE THE FEDERAL ELECTION  
COMMISSION

-----x  
:  
THE FEDERAL ELECTION :  
COMMISSION, :  
Plaintiff : MUR 28-10  
v. :  
COALITION FOR A WINNING :  
TICKET, Defendant. :  
-----x

Deposition of HOWARD SEGERMARK

Washington D.C.

June 28, 1989

Deposition of HOWARD SEGERMARK, called for examination pursuant to agreement by counsel, at the Federal Election Commission, 999 E Street, N.W., Washington D.C. before LORRAINE CARTER, a Notary Public in and for the District of Columbia, when were present on behalf of the respective parties:

920409 [27] 11

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22

**APPEARANCES:**

**PATTY REILLY, ESQ.**  
Federal Election Commission  
999 E Street, N.W.,  
Washington, D.C. 20463

**JONATHAN BURNSTEIN, ESQ.**  
Federal Election Commission  
999 E Street N.W.,  
Washington, D.C. 20463

**ROBERT A. RAICH, ESQ.**  
Federal Election Commission  
999 E. Street N.W.,  
Washington, D.C. 20463

**ALAN P. DYE, ESQ.**  
Webster, Chamberlain & Bean  
1747 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006  
On behalf of the Deponent

92040922712

C O N T E N T S

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22

WITNESS

EXAMINATION

Howard Segermark  
(By Ms. Reilly)

4

E X H I B I T S

Segermark Deposition Number

IDENTIFIED

Exhibit 1

4

Response to Interrogatories

Exhibit No. 2

88

Letter from Senator Humphrey

920409 2713

P R O C E E D I N G S

Whereupon,

HOWARD SEGERMARK

was called for examination by counsel for the Federal Election Commission, and, after having been sworn by the Notary, was examined and testified as follows:

DIRECT EXAMINATION

MS. REILLY: We are here at the Federal Election Commission on June 28, 1989 taking the deposition of Howard Segermark in his capacity as Treasurer of Coaliton For A Winning Ticket.

This deposition is conducted pursuant to a subpoena issued by the Federal Election Commission pursuant to the Commission's subpoena power at 2 USC Section 437-G. The statute provides for confidentiality for the investigation conducted by the Commission. Consequently, you are precluded from discussing the testimony which you are about to give, with anyone other than your counsel.

The Commission has civil jurisdiction

920409 22714

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22

1 pursuant to the Federal Election Campaign Act of 1971  
2 as amended.

3 This matter has been designated, MUR 28-10.  
4 My name is Patty Reilly and I will be taking your  
5 deposition this morning.

6 BY MS. REILLY:

7 Q Would you state your name, please?

8 A I'm Howard Segermark.

9 Q And your address, please?

10 A

11 Q And your business address?

12 A Twenty-five E Street Northwest.

13 Q Mr. Segermark, have you been deposed  
14 before?

15 A No.

16 Q Okay. I'm going to review a few of the  
17 things we are going to be doing here this morning.

18 I will be asking you a series of questions  
19 that are designed to ellicit responses from you about  
20 your own activities and about the activities of  
21 others. It is important that you give full and  
22 complete answers. It is also important that you give

920409522715

1 verbal answers.

2 The court reporter will be taking down your  
3 responses. You should treat this matter as though you  
4 are testifying in a court of law, and remember that  
5 you are testifying under oath. If you do not  
6 understand any question, please let me know. If you  
7 do not let me know that you do not understand a  
8 question, I will presume that you do. I request that  
9 you give full and complete answers to all the answers  
10 that you give.

11 Mr. Segermark, are you represented by  
12 counsel, here this morning?

13 A I am.

14 Q And who is your counsel?

15 A Alan P. Dye.

16 Q Mr. Segermark, did the Commission  
17 previously issue you Interrogatories in this matter?

18 A I believe they were issued initially to the  
19 Coalition for Winning Ticket.

20 Q Did you have a chance to review the  
21 questions which the Commission asked you?

22 A Yes, I did.

1 Q And did you respond to them?

2 A I helped prepare the Response.

3 Q And did you give full and complete  
4 responses to those questions?

5 A Yes.

6 Q Did you also produce materials in response  
7 to those questions?

8 A Yes.

9 Q And did you give all materials which were  
10 responsive to them?

11 A Yes.

12 Q Mr. Segermark, what is your occupation?

13 A I'm Managing Director of Free The Eagle,  
14 which is a grass roots lobbying organization.

15 Q And what sort of lobbying activity does  
16 Free The Eagle conduct?

17 A Primarily, on economic and international  
18 issues.

19 Q Can you give us some examples of some of  
20 the issues you would lobby on?

21 A Surely. We lobbied with regard to the 1986  
22 tax reform legislation. We are presently lobbying on

92040922717

1 the Capitol Gains Tax Legislation.

2 Q Does Free The Eagle conduct any activities  
3 other than lobbying?

4 A Some of our activities are educational.

5 Q And can you give us some examples of some  
6 of the educational activities you conducted?

7 A Yes. We have an intern program in which we  
8 take college students and give them experience in  
9 grass roots politics, and in lobbying. And we  
10 published something called the International Economic  
11 Report, which is based more along academic lines and  
12 is regarded, I think, well respected in those circles.

13 Q And how long have you been publishing that  
14 publication?

15 A I would say, five years. It is under that  
16 title only for the past 18 months or so.

17 Q What was the previous title?

18 A I can't remember.

19 Q Have you held any previous positions with  
20 Free The Eagle?

21 A No. I've been managing director since I  
22 started with Free The Eagle, approximately April of

1 '87.

2 Q And how long has Free The Eagle been in  
3 existence?

4 A Since 1980.

5 Q Has the activities which Free The Eagle  
6 conducts which you have just described, have they been  
7 doing that since 1980?

8 A Yes. It was founded primarily to be  
9 involved in economic issues. We have been involved in  
10 international issues as well.

11 Q And who was the founder of Free The Eagle?

12 A The present Chairman of the Board, Howard  
13 J. Ruff, a financial advisor.

14 Q Does Free The Eagle have a Board of  
15 Directors?

16 A Yes, it does.

17 Q And who is on the Board of Directors?

18 A Give me a moment here. Mr. Ruff is  
19 Chairman. I serve on the board. William Hagerman of  
20 Pennsylvania, Betty Hanicke, of Kansas City  
21 Missouri -- excuse me, Kansas City, Kansas; Joe  
22 Hudson of Delaware, James Blanchard of Louisiana. Who

1 am I forgetting now? How many is that?

2 Q It looks to me like there are six.

3 A And you got me in that too? I'm missing  
4 somebody. Paul Recluwicz, R-E-C-L-U-W-I-C-Z something  
5 like that. Put a question mark there. He is from  
6 California.

7 Q Mr. Segermark, what are your duties with  
8 Free The Eagle?

9 A I'm chief operating officer. I'm in charge  
10 of hiring and firing staff, seeing to it that our  
11 activities are performed in conjunction with what the  
12 Board authorizes, overseeing the financing fund  
13 raising program and expenditures.

14 Q Is your position with this organization a  
15 fulltime one?

16 A It is not fulltime.

17 Q And what other positions do you hold?

18 A I am Chief Executive Officer of my own firm  
19 which manages other organizations.

20 Q And what is the name of your firm?

21 A Segermark Company.

22 Q And where is that located?

1 A In the same office.

2 Q And what sort of business does Segermark  
3 Company do?

4 A In that capacity, it manages two very small  
5 trade associations, the National Venture Association,  
6 and the Motorcycle Riders Foundation.

7 In addition, Segermark Company represents  
8 in Washington, a securities firm and basically,  
9 monitors legislation of interest to them.

10 Q Does the Segermark Company provide any  
11 goods and services to the Free The Eagle?

12 A I should point out that my position with  
13 Free The Eagle is as a service provider through my  
14 company. In other words, Segermark Company is  
15 formerly retained. I have the title of managing  
16 director, but the Segermark Company provides the  
17 services.

18 Q Prior to assuming your position at Free The  
19 Eagle, where were you employed?

20 A With the Segermark Company.

21 Q And how long have you been with the  
22 Segermark Company?

92040922721

1           A       I incorporated the Segermark Company in  
2 '81. At that time, I was also working on Capitol  
3 Hill. From 1983 to '85, I worked in California for an  
4 economic consulting firm, and really reactivated my  
5 corporation when I came back to Washington. At that  
6 time, my chief clients were money management firms  
7 through King Securities, which remains a client.

8           Q       And was that a fulltime position that you  
9 held with the Segermark Company during that period  
10 prior to coming on to Free The Eagle?

11          A       Yes. When one owns one's company like  
12 this, it is really much more than a fulltime position  
13 and the expanded responsibilities I have assumed have  
14 been in part taken up by staff, as well as extended  
15 hours for myself.

16          Q       Prior to that period of time, what  
17 positions did you hold in terms of employment?

18          A       Prior to which time?

19          Q       Prior to the establishment of Segermark  
20 Company.

21          A       I was a staffer on Capitol Hill.

22          Q       And what period of time were you a staffer

1 on Capitol Hill?

2 A '67 through '83.

3 Q And for whom did you work?

4 A Congressman Anchor Nelson of Minnesota;

5 Congressman Steve Simms of Idaho; Senator Harriot

6 Byrd Jr. of Virginia; and Senator Jesse Helms of North

7 Carolina.

8 Q And what position did you hold with Senator  
9 Helms?

10 A I was Economic Counsel.

11 Q And what period of time was that?

12 A That was '76 to '83.

13 Q And Senator Byrd, what was your position  
14 with him?

15 A Tax counsel.

16 Q What period of time was that?

17 A '74 to '76.

18 Q And Representative Simms?

19 A Administrative Assistant.

20 Q And what period of time was that?

21 A '72 through '73.

22 Q And Representative Nelson?

1 A Legislative Assistant, '67 to '73.

2 Q Prior to coming on to Capitol Hill, what  
3 was your source of employment?

4 A I was in graduate school.

5 Q And where were you in graduate school?

6 A Notre Dame.

7 Q And where did you graduate?

8 A I didn't graduate from Notre Dame. I  
9 graduated from Carroll College in Wisconsin, and  
10 attended graduate school in Notre Dame, in political  
11 theory. I did not receive a degree.

12 Q Are you a member of any professional  
13 associations?

14 A Yes, American Society of Executives, I  
15 guess professional organizations, other organizations  
16 as well.

17 Q Do you currently hold any offices with any  
18 political professional associations?

19 A No.

20 Q Have you in the past?

21 A No.

22 Q Have you rendered political services to any

1 political committees in your experience with the  
2 Segermark Company?

3 A Yes. For approximately six months, I was  
4 President of Ruff Pac, a political action committee  
5 which was chaired by Howard J Ruff. And I left that,  
6 gee, I forget the date now. I'd say approximately  
7 in -- it was January 1st, 1988 because we wound  
8 everything up to be January 1st.

9 Q What position did you hold then?

10 A I was President.

11 Q What sort of activities did you conduct on  
12 behalf of Ruff Pac?

13 A I administered its fundraising program and  
14 staffing and financial procedures. I organized a  
15 financial and legal audit of the organization.

16 Q And you held that position for --

17 A I want to say six months.

18 Q Why did you leave?

19 A I thought it was more important to maintain  
20 separation in appearance as well as reality, between  
21 the political action committee and the grass roots  
22 lobbying organization.

1 Q Are you currently still associated with  
2 Ruff Pac?

3 A No, I am not.

4 Q And were you paid a salary by Ruff Pac?

5 A Yes. Segermark Company, again, was retained  
6 for my services.

7 Q Mr. Segermark, are you familiar with the  
8 Federal Campaign Act of '71?

9 A I've heard of it, of course.

10 Q Have you read it?

11 A No, I have not read it.

12 Q Have you taken any seminars on it?

13 A No, I have not.

14 Q Have you read any publications discussing  
15 the Federal Act --

16 A Yes.

17 Q What publications can you tell me?

18 A I can't tell you.

19 Q Have you read publications that have been  
20 put out by any state party committee?

21 A I don't think so.

22 Q Have you read any publications that have

1       been put out by the Commission?

2           A       Yes.

3           Q       Do you recall which ones?

4           A       No.

5           Q       Have you had occasion to read a copy of the  
6 Commission's regulations?

7           A       I'm sure I glanced at it.

8           Q       Are you aware that the Federal Election  
9 Campaign Act establishes limitations on the amount  
10 that an individual can contribute?

11          A       Absolutely.

12          Q       And what do you understand that amount to  
13 be?

14          A       Good question. It's either \$1,000 or  
15 \$5,000; I'm not sure.

16          Q       Are you aware that the Federal Election  
17 Campaign Act prohibits corporations from making  
18 contributions?

19          A       Yes.

20          Q       And do you know that the Federal Election  
21 Campaign Act prohibits unions from making  
22 contributions?

1 A No.

2 Q At this point, I am going to hand to the  
3 court reporter --, actually, we should go off the  
4 record for a second.

5 (Short discussion off the record)

6 BY MS. REILLY:

7 Q I'm going to hand to the court reporter  
8 what has been marked as Exhibit one or will be marked  
9 as Exhibit one, and hand one to the witness, and one  
10 to the witness's counsel and ask you to take a moment  
11 and please review these documents.

12

13 (Whereupon a document was marked as  
14 Deposition Exhibit Number one).

15 Q Have you had a chance to review these  
16 documents?

17 A Yes.

18 Q Are you familiar with them?

19 A Pretty much.

20 Q This purports to be a response of Coalition  
21 For Winning Ticket to the Federal Election Commission  
22 with Interrogatories, and request for production of

1 documents. It is in its entirety, 21 pages in length.  
2 It includes two, I'm sorry, three pages of written  
3 answers and three exhibits, lettered A, B, and C.

4 I'm going to ask you to turn to the first  
5 page and the first sentence of that document which  
6 says, that "Coalition For Winning Ticket was formed on  
7 July 25th, 1988".

8 Mr. Segermark, can you tell us what steps  
9 were taken on July 25th, 1988 to form Coalition For  
10 Winning Ticket?

11 A Yes. A meeting was held in Senator  
12 Humphrey's office. At that time, the issue of where  
13 conservatives stood and conservative issues stood with  
14 regard to the presidential election, it was felt that  
15 the Coalition that helped elect the President in 1980  
16 and '81 was based on appealing to certain issues,  
17 amongst those, being right-to-life, tax rate cuts, and  
18 a strong defense.

19 It was thought that one way to influence  
20 the campaign would be to get involved in urging a Vice  
21 Presidential candidate that embodied, or that  
22 supported those issues.

1 Discussion was held as to whether or not  
2 this was a political action committee or not. And it  
3 was agreed that we would not participate in anything  
4 that would be construed as a political action  
5 committee; specifically, that we would not advocate  
6 any individual for a Vice Presidential -- to be on the  
7 Vice Presidential ticket. Senator Humphrey pointed  
8 out that one of the first things to do would be to  
9 remove himself from any consideration.

10 At that time, I offered my services to help  
11 the Coalition as long as it was consistent with the  
12 law, and we received indications that that was in fact  
13 the case. And we continued to make every effort to  
14 keep the organization away from any political action  
15 committee.

16 MR. DYE: Let me interject here. I think  
17 maybe Patty was asking a more mundane question as to  
18 what formal steps -- were you focusing on the word  
19 "formed" here, how was it formed?

20 MS. REILLY: Yes.

21 A Oh. Well, because I guess what I said, may  
22 have been relevant, because I said, if, in fact, it is

1 not a political action committee and a lobbying  
2 function, I said, Free The Eagle in the past has  
3 lobbied on the platform of both the Democratic and  
4 Republican Campaign, and we intend to lobby on the  
5 platform for the Republicans. And if this is a  
6 lobbying operation, then we can take it on as a  
7 project of FTE.

8 Q Who was present at the July 25th meeting?

9 A I'm not sure I can tell you everyone.

10 Senator Humphrey, myself, Dan Parrin, who subsequently  
11 acted as staff to Coalition; Paul Weyrich, Ellen  
12 Dye -- was Howard Phillips there -- he may have been.  
13 Howard Phillips, possibly, and another assistant of  
14 Mr. Weyrich's. Oh, Richard Vigeurie was there as well.

15 Q What were the discussions that were held at  
16 that meeting?

17 A Well, I don't think I can be comprehensive,  
18 but discussion was held concerning how to mobilize  
19 constituencies that are interested in these issues  
20 which we felt to be paramount.

21 One of the questions that was raised and  
22 was continued to be raised in meetings of the

1 Coalition leadership, and that was if in fact we get  
2 involved in naming names, we stand a very good chance  
3 of alienating constituencies and we did not want to do  
4 that. And it was commonly held and repeated, crater,  
5 that we weren't going to get involved in naming names.  
6 I think we touched on briefly, specific issues on  
7 right-to-life, on tax issues, on strategic defense,  
8 and others which I can't recall.

9 Q Were the names of any persons mentioned as  
10 being unacceptable to the Coalition?

11 A At that time?

12 Q Yes.

13 A I don't think so. I don't recall that  
14 being the case.

15 Q At a later date, at some later date, was  
16 some names mentioned as being unacceptable to the  
17 Coalition?

18 MR. DYE: Mentioned by whom?

19 MS. REILLY: By the participants at that  
20 meeting.

21 MR. DYE: In any form, later on, at any  
22 other meeting, or in the newspaper, or personally or

1 the institution? You have to narrow this question.

2 MS. REILLY: Well, if Mr. Segermark, is  
3 aware of any, I think he can respond.

4 THE WITNESS: I was, in spite of the fact  
5 that we had agreed, and the leadership of the  
6 Coalition had agreed that it would be wrong to name  
7 names, because it would hurt our constituencies.

8 I recall that at a press conference in New  
9 Orleans, Senator Humphrey demured several times and  
10 finally was asked, specifically, is -- I want to say,  
11 that he was asked, like, is Dole okay? At which he  
12 said, "no". And someone said, "is Simpson, okay"; and  
13 he said "no".

14 And I don't know if that continued or not,  
15 but then he said, I don't want to get involved in  
16 this. When questions were asked of the staff, we gave  
17 the standard exact issue, which was that if, in fact  
18 people were involved, you know, would agree to our --  
19 the issues that we felt were most important, then of  
20 course, they would be acceptable. And staff was  
21 specifically instructed never to name names.

22 Q Returning back, again, to the July 25th

1 meeting, how did the group, Coalition For Winning  
2 Ticket, acquire its name?

3 A That's a good question. I think it related  
4 to this issue, as I mentioned, about the '80 and '84  
5 elections. In other words, if, in fact coalitions of  
6 ethnic democrats, blue collar workers, and others  
7 could not be mobilized, there would not be a  
8 possibility of a conservative victory.

9 Q When were you invited to the July 25th  
10 meeting?

11 A I'm not sure, probably not more than a few  
12 days before.

13 Q And who invited you?

14 A I think Dan Perrin was organizing things  
15 for Senator Humphrey at that time.

16 Q Did you have an occasion to invite anyone  
17 to that meeting?

18 A No.

19 Q The group that you described as being at  
20 that meeting, were they all considered members of the  
21 Coalition?

22 A I think their organization, or a

92040922734

1 organization with which they were affiliated,  
2 subsequently joined the Coalition. Formerly, any one  
3 who sent in \$100 was a member of the Coalition, and I  
4 think that all of those people there are associated  
5 one way or another with at least one of these  
6 organizations.

7 Q The conclusion of the July 25th, 1988  
8 meeting, was a strategy developed by the persons there  
9 regarding how the Coalition for Winning Ticket, would  
10 proceed?

11 A Yes, we did discuss about contacting  
12 delegates, about raising funds, staffing. I agreed to  
13 help develop a budget which I did.

14 Q And when did you develop the budget?

15 A The next couple of days.

16 Q And how much was the budget?

17 A I think it was probably \$30 or \$40,000  
18 dollars.

19 Q At the July 25th meeting, was there any  
20 discussion regarding incorporating Coalition For  
21 Winning Ticket?

22 A Yes, there was.

1 Q And what was the substance of that  
2 discussion?

3 A Much along the same lines as I had  
4 mentioned. In other words, if in fact, this was a  
5 lobbying operation, and could be done as a project of  
6 an existing lobbying organization, or if in fact, it  
7 was a political action committee in which we would  
8 have to incorporate, we would then incorporate as a  
9 special political committee.

10 Q What do you understand a project to do?

11 A A project?

12 Q Yes.

13 A Let me give you an example: The World  
14 Bank -- the International Monetary Refund, rather, is  
15 up for \$125 billion increase in its capitol. Free The  
16 Eagle for some time has been involved in lobbying on  
17 World Bank and IMF legislation.

18 This year, we expect to continue to do so  
19 and we have sought as a special fundraising effort, to  
20 raise funds to lobby on this particular project. In  
21 other words, the IMF project.

22 And we regarded CWT as long as it was not a

1 political action committee, to be a similar kind of  
2 lobbying project. It fitted in with our plans to  
3 lobby the Platform on certain economic and  
4 international issues as well.

5 Q So your intention was to lobby--

6 A The Republican Platform Committee.

7 Q Were you intending to lobby anyone else?

8 A Well, I mean, certainly, there are many  
9 congressmen that always attend this conference and  
10 participate in the Platform Committee. But we review  
11 the platforms as being a logical issue forum and means  
12 of getting people to support legislation.

13 Q At this time at the July 25th meeting, were  
14 you intending also to lobby delegates?

15 A Well, delegates make up the Platform  
16 Committee.

17 Q Are there delegates who are not on the  
18 Platform Committee?

19 A Sure, but they have to vote on the  
20 platform.

21 Q So by the "Platform Committee", you mean  
22 all delegates?

7  
1           A       Well, two stages, actually three. The  
2 Platform is developed initially in subcommittees. The  
3 subcommittees hold hearings and then make a report to  
4 the full committee. The hearings are actually held in  
5 subcommittees. So we would work with staff and  
6 members of the subcommittee, and then, similarly, lobby  
7 members of the full committee, and if we felt it  
8 appropriate, to lobby to the entire delegate -- the  
9 entire convention.

10           I should point out that the 1980 Platform  
11 had been used with some efficacy to seek to get  
12 members to conform to what their party platform said  
13 when it came to supporting legislation. This is a  
14 very helpful tool.

15           Q       At the July 25th meeting, were any writings  
16 generated from that meeting regarding the formation of  
17 Coalition For Winning Ticket?

18           A       I think probably the only writing was the  
19 budget memorandum that I prepared.

20           Q       And no other writings?

21           A       Not to my knowledge.

22           Q       At this meeting, was an Executive Committee

1 set up?

2 A Not formerly.

3 Q Was there an informal Executive Committee  
4 set up?

5 A I think the people in the room were  
6 probably the informal Executive Committee.

7 Q And those people are again?

8 A As I mentioned, Paul Weyrich, Richard  
9 Vigeurie, Senator Humphrey, myself; others were added  
10 as time went on.

11 Q So, essentially, Weyrich, Vigeurie, and  
12 Senator Humphrey, and yourself would be considered the  
13 core people?

14 A I would be hesitant to limit it to that.

15 Q Who else would you extend it to?

16 A Certainly, Howard Phillips, Robert Kriebel.

17 MR. DYE: You're not saying that Kriebel  
18 was there?

19 THE WITNESS: No.

20 MR. DYE: Extended later on.

21 A James Summers.

22 BY MS. REILLY:

1 Q Were any officers appointed at that  
2 meeting?

3 A No.

4 Q Did any people agree to assume certain  
5 responsibilities for Coalition For Winning Ticket?

6 A It was agreed that Senator Humphrey would  
7 be the particular head.

8 Q And what were his duties to be?

9 A They were not spelled out.

10 Q Were they subsequently spelled out?

11 A No, I don't think so. I mean, he will be  
12 our chief spokesman. I think that is the most  
13 important duty. And certainly, Senate Humphrey was  
14 very active speaking to individuals and groups about  
15 our goals.

16 Q Did Senator Humphrey conduct any other  
17 activities on behalf of Coalition For Winning Ticket?

18 A He certainly was involved in helping raise  
19 funds for it.

20 Q Anything else?

21 A I mean he was involved in, you know,  
22 editing any press releases or statements. Usually the

1 statements would be from him, so it would be logical  
2 to be involved.

3 Q Was he also responsible for reviewing any  
4 letters that went out by Coalition For Winning Ticket?

5 A Certainly all those over his signature were  
6 reviewed by the Senator.

7 Q Did he write any?

8 A He was involved in substantive writing of  
9 them.

10 Q Did the Coalition have a treasurer?

11 A Insofar as -- I mean, the way we organized  
12 it, we set up a separate bank account in effect for  
13 Free The Eagle. And I acted as Treasurer. I had to  
14 sign checks.

15 Q Was there any person other than those that  
16 you've previously mentioned, who had decision-making  
17 authority regarding Coalition For Winning Ticket?

18 A I don't know exactly what decision-making  
19 authority would mean. You mean, signing checks and  
20 approving checks? Certainly Senator Humphrey was  
21 involved as was I, but I don't think that I -- people  
22 said, okay, go spend money or sign a check. Usually

1 these decisions were made by consensus. The only  
2 substantial expenditures were for staff and expenses  
3 and that was a consensus decision.

4 Q You previously mentioned that Dan Perrin  
5 was present at that meeting.

6 A Yes.

7 Q Did he assume any responsibilities  
8 regarding Coalition For Winning Ticket?

9 A He was our only fulltime -- in effect  
10 fulltime staff for the period the Coalition was in  
11 operation.

12 Q I'm going to ask you to direct your  
13 attention to the second sentence of that document  
14 which we are discussing on page one, which states, "As  
15 a member of the Coalition, Free the Eagle Managing  
16 Director, Howard Segermark offered to provide office  
17 space and accounting services".

18 To whom did you make this offer to?

19 A To the group that was there.

20 Q And what response did you receive?

21 A Okay.

22 Q And the office space which you offered to

92040922742

8

1 provide, where was it located?

2 A There were some vacant desks in our office  
3 suite.

4 Q And this was located at 25 E Street  
5 Northwest?

6 A That's right.

7 Q Does Free The Eagle share any office space  
8 with any other organizations?

9 A No.

10 Q Has it previously shared office space with  
11 any other organization?

12 A No. The reason I paused, is because we  
13 recently established an educational foundation, but  
14 that foundation has not been active at all and  
15 anticipate if it does get active, and is able to hire  
16 staff, that we would share office space with them.

17 Q And what is the name of that foundation?

18 A Free The Eagle Education Foundation.

19 Q And approximately, how much space was  
20 allocated to Coalition for Winning Ticket, at those  
21 offices?

22 A About 75 square feet.

1 Q And how many desks would that be?

2 A One.

3 Q And who occupied that desk?

4 A Dan Perrin.

5 Q Was Mr. Perrin there fulltime?

6 A More or less fulltime, yes.

7 Q Was he still serving on Senator Humphrey's  
8 staff as well, at this time?

9 A No, I don't think so. In fact, I'm quite  
10 sure he wasn't.

11 Q He was your only fulltime employee?

12 A Yes.

13 Q Was he paid a salary?

14 A I'm not sure if it was salary or hourly. I  
15 can't tell you.

16 Q But he was paid funds?

17 A He was paid, yes.

18 Q How much was he paid?

19 A I don't know. Is that in here? I don't  
20 know. I would say -- its hard. I would say something  
21 like maybe \$10 an hour, but I can't be sure.

22 Q Did Coalition For Winning Ticket have

1 office space anywhere else?

2 A Yes, it rented offices in New Orleans.

3 Q Anywhere else?

4 A No.

5 Q Now how much space does Free The Eagle  
6 occupy at 25 E Street?

7 A I would say about 2700 square feet.

8 Q And how many employees are there?

9 A Let me count them -- 11.

10 Q As of today?

11 A Yes.

12 Q And how many did you have, say, in July of  
13 '88?

14 A I think it was the same amount.

15 Q And same answer for January of 1988?

16 A Probably, January would be -- January of  
17 '88, I think 11 is still a good number, maybe 12 at  
18 that time.

19 Q Is 25 E Street, Free The Eagle's only  
20 address?

21 A Yes.

22 Q Has it ever maintained offices anywhere

920409 2745

1 else?

2 A That's right, it has. It had an office in  
3 Fairfax until 1988. Then it moved to the District; it  
4 consolidated.

5 Q So at one point, it had two offices?

6 A Yes, Waples Mill Road, and I don't know the  
7 number.

8 Q I'm going to ask you to direct your  
9 attention, please, also to page one of Exhibit One,  
10 regarding the organizations of the Coalition and  
11 essentially, we are going to go through them for some  
12 information about them.

13 The first one is the American Conservative  
14 Union.

15 How did this organization come to be part  
16 of Coalition For Winning Ticket?

17 A I'm under the impression that a list of  
18 conservative organizations was obtained by Dan Perrin  
19 and they were all invited.

20 Q And when were they invited to join them?

21 A I don't know. Sometime in July.

22 Q Would it be after the July 25th meeting?

1           A       No, initially, before. I'm not exactly  
2       sure because it was after that July 25th meeting that  
3       I first became active. Many of these organizations  
4       had been solicited beforehand.

5           Q       Did you speak to anyone at the American  
6       Conservative Union?

7           A       No.

8           Q       Who, at Coalition For Winning Ticket would  
9       have spoken with them?

10          A       Dan, if anyone, but I think many of these  
11       organizations did not speak with anyone involved with  
12       CWT. They simply sent in their check.

13          Q       And how did they come to send in a check?

14          A       They were solicited.

15          Q       And were they solicited by a mailing by  
16       Coalition for Winning Ticket?

17          A       That is my understanding.

18          Q       Do you know if any of them were solicited  
19       in any other way?

20          A       Probably by phone call.

21          Q       And who would have made those phone calls?

22          A       Dan.

1 Q Did you make any phone calls to any other  
2 organizations requesting they become members of  
3 Coalition For Winning Ticket?

4 A I may have, but I don't recall.

5 Q The American Conservative Union, is that an  
6 incorporated entity?

7 A I don't know -- I'm sure it is. My  
8 suspicion is that it is but I don't know if they are a  
9 pac or a lobbying organization or what. I don't know.

10 Q What do you understand the business of this  
11 organization to be?

12 A ACU?

13 Q Yes.

14 A I know they rate congressmen on their  
15 voting record.

16 Q Did the American Conservative Union provide  
17 any funds to the Coalition For Winning Ticket?

18 A As I said, my understanding is that all of  
19 these organizations contributed at least \$100.

20 Q Do you know if any of the organizations  
21 listed here, 1 through 24 contributed more than \$100?

22 A I don't know for sure, but I certainly can

1 find out.

2 Q We would appreciate that.

3 Could anyone have joined Coalition For  
4 Winning Ticket if they hadn't paid at least \$100?

5 A I would expect that if, in fact, they  
6 donated services, in other words, if somebody said,  
7 you know, can you use a secretary for a couple of  
8 days, or something like that, we would have certainly  
9 said, come on, that's fine.

10 Q Did any of the organizations donate any  
11 services?

12 A I think so. Again, Perrin would know more  
13 than I because for example, Dan put together the  
14 mailings to the delegates that we had and that took,  
15 you know, a lot of handwork.

16 Q Did Free The Eagle donate any secretarial  
17 services?

18 A I think that insofar as the phones were  
19 answered by Free The Eagle staff, it provided those  
20 services. And it may have provided some additional  
21 minimal services.

22 Q What would be examples of those, the

1 minimal services?

2 A Having something zeroxed. If -- I was  
3 going to say having something typed, but everybody in  
4 our office types as does Mr. Perrin. So we only have  
5 really one support staff for the whole staff. And I  
6 don't get involved in having people have secretaries  
7 as a rule. So probably zeroxing.

8 If, in fact our receptionist had free time,  
9 I would expect that she volunteered to stuff envelopes  
10 or things like that if it was convenient. But Mr.  
11 Perrin did have, you know, chief responsibilities for  
12 those functions.

13 Q Does Free The Eagle have a computer system?

14 A Yes, it's a network PC system.

15 Q And did Mr. Perrin have access to that  
16 computer system?

17 A Yes. That is at the desk.

18 Q And that is how he conducted most of the  
19 work which he did there?

20 A That's right.

21 Q Did American Conservative Union put on any  
22 publications other than the ratings of congressmen?

1 A I'm sure they do, I don't know.

2 Q Have they mentioned Coalition For Winning  
3 Ticket in any of their publications?

4 A Not to my knowledge.

5 Q Citizens Coalition which is the second one  
6 listed there, what was the business of that  
7 organization?

8 A I'm not sure.

9 Q Have you spoken with anyone there?

10 A No. I don't know who is involved in that  
11 organization.

12 Q Do you know it to be a political committee?

13 A I don't know.

14 Q And is it your understanding that they have  
15 provided funds to Coalition For Winning Ticket?

16 A As I previously described, I would expect  
17 so, yes.

18 Q And the third organization on the list,  
19 which is, Coalitions for America; what do you  
20 understand the business of that organization to be?

21 A I think that is the organization that Mr.  
22 Weyrich would be associated with. And they -- I'm

1 afraid to misspeak because Mr. Weyrich is involved in  
2 many organizations. And one of the organizations  
3 works on organizing Coalitions of lobbying groups on  
4 specific legislation. And my guess, is that is the  
5 chief job of Coalitions For America.

6 Q Do you understand it to be a 501 C4 or 501  
7 C3 organization?

8 A I don't know. My guess is that it is  
9 probably not a C3, if, in fact this is the  
10 organization that I'm talking about. It does get  
11 involved in lobbying and it might be a C6 to -- no, it  
12 couldn't be a C6.

13 Q Where is this organization located?

14 A If its the one I think, it is on 2nd Street  
15 Northeast.

16 Q And do you know if it has offices or  
17 directors?

18 A I'm sure it does, but I don't know.

19 Q You don't know who?

20 A No. It is not impossible that Coalition  
21 For America could be a project of another organization  
22 as much as Coalition For Winning Ticket was a project

1 of FTE.

2 Q Did you deal with anyone at Coalition For  
3 America, regarding Coalition For Winning Ticket?

4 A As I said, this is the organization that  
5 Mr. Weyrich is associated with and Mr. Weyrich  
6 certainly was involved in our deliberations.

7 Q Does Coalition For America put out any  
8 publications?

9 A I don't know.

10 Q Did any one at Coalition For Winning Ticket  
11 other than Mr. Perrin, have any communications with  
12 Coalition For America?

13 A Well, I certainly met with Weyrich,  
14 regularly.

15 Q How often would you meet with Weyrich?

16 A Probably twice before the convention and  
17 daily during the convention.

18 Q Now, on the two occasions prior to the  
19 convention when you met with Mr. Weyrich, was anyone  
20 else there with you?

21 A Oh, it would be a group meeting as we had  
22 with Senator Humphrey.

920409 2753

1 Q Would Senator Humphrey attend these  
2 meetings too?

3 A Yes; not all.

4 Q Where were the meetings held?

5 A Lets see, there were a couple of meetings  
6 at Crystal City Hotel. I can't tell you which one. I  
7 think one meeting was held in our offices, at least  
8 one. And then the other meetings were held at the  
9 offices of Coalition in New Orleans.

10 Q So there were at least three meetings held  
11 prior to the convention, two at a hotel in Virginia  
12 and another at your offices?

13 A Yes, I'm not sure of the exact number.

14 Q In terms of the meetings that were held at  
15 the hotel, --

16 A Could you excuse me a second. I had an  
17 11:00 appointment which I'm going to have to cancel or  
18 something. I didn't realize we were going to go into  
19 such length here.

20 MR. REILLY: Why don't we take a break and  
21 there is a phone you can use there.

22 (Off the record discussion held)

1 (Luncheon recess taken)

2 BY MS. REILLY:

3 Q While we were off the record, we had  
4 discussions regarding the previous set of questions,  
5 regarding organizations listed on page one of Exhibit  
6 One.

7 Because it appears that Mr. Segermark was  
8 not familiar with all of the organizations, we agreed  
9 to submit written questions to be voluntarily answered  
10 because of this agreement, we will restrict our  
11 questions to these organizations in a more focused  
12 fashion, with the understanding that if we submit  
13 written questions, they will be answered.

14 THE WITNESS: To the best of of our  
15 ability. If some of these guys don't want to  
16 cooperate, you'll have to go to them.

17 MR. BURNSTEIN: Is that agreeable to you,  
18 Mr. Dye?

19 MR. DYE: As Howard said, these are  
20 independent organizations. Obviously, also to the  
21 extent that your inquiries are reasonable which I  
22 would assume to be similar to the first questions.

1 BY MS. REILLY:

2 Q Mr. Segermark, I'm going to ask you to  
3 direct your attention, please, to item number four on  
4 page one of Exhibit One, which is the College  
5 Republican National Committee.

6 What persons associated with this  
7 organization were involved in Coalition For Winning  
8 Ticket activities?

9 A The chairman of that committee, -- his name  
10 will come to me. Go on.

11 Q And what communications were made between  
12 Coalition For Winning Ticket and that organization?

13 A The chairman participated in some of the  
14 meetings, and I think he got some volunteer help to  
15 help with mailings and things like that. He was also  
16 down in New Orleans.

17 Q And did the volunteers work out of 25 E  
18 Street?

19 A Well, much of the work was done down in New  
20 Orleans. The mailings were done at 25 E Street  
21 insofar as, you know, there was volunteer work done in  
22 Washington. I think it is fair to say it was done out

1 of 25 E Street.

2 Q The Conservative Caucus which is next on  
3 the list, what persons associated with that  
4 organization were involved with Coaliton For Winning  
5 Ticket?

6 A Howard Phillips.

7 Q And what communications were there between  
8 Coalition For Winning Ticket, and Howard Phillips?

9 A Well, he attended our meetings.

10 Q Did he attend all of the meetings?

11 A Many.

12 Q The next one on the list, is Conservatives  
13 of Texas, and the question is the same.

14 What persons associated with this  
15 organization were involved with Coalition For Winning  
16 Ticket activities?

17 A That, I don't know.

18 Q Do you know what communications were made  
19 between them and this organization?

20 A No.

21 Q The next item on the list, is The Eagle  
22 Forum.

1           A        Wouldn't it be easier if I go down and tell  
2 you the things I do know something about?

3           Q        Well, I don't think it will take too long?

4           A        All right, sure. Eagle Forum is chaired by  
5 Phylis Schlafly.

6           Q        And what communications did Ms. Schlafly  
7 have with Coalition for A Winning Ticket?

8           A        She participated in, I think, one or two  
9 meetings in New Orleans.

10          Q        Did she participate in any of the meetings  
11 in DC?

12          A        No.

13          Q        The Free Market Political Action Committee,  
14 you don't know about that; is that correct?

15          A        Yes.

16          Q        The Gun Owners of America?

17          A        I know the chairman of that organization,  
18 John Snyder. I don't know, I don't recall him at a  
19 meeting, any meetings.

20          Q        Do you recall communicating with him about  
21 the Coalition For A Winning Ticket, activities?

22          A        I think it is fair to say, that Dan Perrin

1 got one or two at least, letters out to everybody on  
2 this list.

3 Q And the organization entitled, High  
4 Frontier.

5 A That is chaired by General Dan Graham. And  
6 he certainly participated in meetings in New Orleans,  
7 possibly in Washington, but I don't recall for sure.

8 Q And the High Frontier?

9 A Yes, that is his organization.

10 Q The National Congressional Club?

11 A That is chaired by Tom Ellis and I don't  
12 think he attended any meetings.

13 Q Were there any communications made to Mr.  
14 Ellis other than the one or two letters which you  
15 mentioned, from Mr. Perrin?

16 A Not official. I'm sure that people  
17 involved in the Coalition talked to Tom. I did not,  
18 personally.

19 Q The National Conservative Political Action  
20 Committee?

21 A The Chairman of that is Mazell  
22 Shortley, M-A-Z-E-L-L, S-H-O-R-T-L-E-Y, I think. I'm

1 not sure. I don't think she attended any meetings. I  
2 did speak to her once about what we were doing down in  
3 New Orleans.

4 Q What was the substance of that  
5 conversation?

6 A I think it had to do with whether or not we  
7 were maintaining the Coalition together and not  
8 offending anyone.

9 Q And when did that conversation occur?

10 A I can't tell you for sure. The convention  
11 was basically divided into two weeks. The first week  
12 of the Platform activities and the second week of  
13 Convention activities. And I would -- just a rough  
14 guess, towards the end of the Platform Week.

15 Q Were concerns raised that the Coalition For  
16 A Winning Ticket might be offending persons?

17 A That's what I recall. That was the thing,  
18 you know, have we upset the Robertson people, for  
19 example.

20 Q And how did that occur?

21 A I can't recall.

22 Q Did you have any conversations with anyone

1 in the Robertson Camp regarding a concern?

2 A No, I did not.

3 Q Do you know who did?

4 A I'm not sure, I'm not sure. I get the  
5 impression that this was raised at a meeting.

6 MR.DYE: Are you sure that anyone did?

7 Your question seems to assume that someone did.

8 MS. REILLY: The question doesn't assume  
9 that someone did.

10 THE WITNESS: I'm not sure, I'm not sure.  
11 Insofar as there were communications with any of the  
12 people who might have been considered for Vice  
13 President, there aren't that many people involved in  
14 the scene.

15 I would expect that everybody talked to  
16 people who are partisans for one of candidates or  
17 another, people involved in CWT and people not  
18 involved in CWT. I think I may be confusing though,  
19 because we were involved in -- Free The Eagle was  
20 involved in lobbying on the Platform. And one of the  
21 issues was tax increases. And I'm trying to recall  
22 whether or not any of these other people got involved

1 on that issue, one way are another. I think --

2 Q And by "any of these other people", who do  
3 you mean?

4 A Potential candidates for Vice President. I  
5 really can't -- though the staff of the Economic  
6 Policy Subcommittee would know that better than I. So  
7 I mean, it is not impossible that we could have  
8 certainly talked to these people. I personally have  
9 friends that have been working for these people.

10 Q What about the Ruff Political Action  
11 Committee?

12 A That was chaired by Neil Blair at the time.

13 Q Is Mr. Blair still the Chairman of it?

14 A No, he is not. I shouldn't say,  
15 "Chairman". He was President at the time, and Howard  
16 Ruff was and remains Chairman. The chief staffer is  
17 Tammy Lyles.

18 Q What communications did this organization  
19 have with Coalition For A Winning Ticket?

20 A They came by our office in New Orleans.  
21 They were not involved in what might be considered the  
22 leadership group.

1 Q And when they came by in New Orleans, what  
2 was the purpose of their coming by?

3 A I think to get information. One of the  
4 rules that I try to set up, is that anybody that came  
5 by would be given a job, whether it be grinding out  
6 press releases or phoning or arranging meetings,  
7 things like that. So they might have gotten some of  
8 their people to do some work. I really don't  
9 remember. Most of the people that we had working were  
10 young people volunteers.

11 Q What about Salt Pac?

12 A I don't know anything about them.

13 Q What about, State Department Watch?

14 A Same Answer.

15 Q The National Teenage Republicans?

16 A Same thing, I don't know anything about  
17 them.

18 Q Mr. Segermark, if you could --

19 A I don't know anything about who runs that  
20 organization, or what communications we may have had  
21 with them.

22 Q The New Hampshire Conservative Union, what

1 persons associated with that organization were  
2 involved with Coalition For --

3 A I don't know. Senator Humphrey being from  
4 New Hampshire, would be my guess that those were  
5 people he knew.

6 Q Do you know what communication the  
7 Coalition had with people from the New Hampshire  
8 Conservative Union?

9 A Other than routine communications with  
10 everybody, no.

11 Q United Conservatives of America Political  
12 Action Committee?

13 A I don't know who is involved in that, or  
14 what conversations may have been involved.

15 Q The United Families of America, what  
16 persons associated with that organization --

17 A I don't know anything, who was involved  
18 with that.

19 Q Do you know of the communications which  
20 were involved?

21 A No, other than the communications which we  
22 gave to everyone.

1 Q And all these persons, the 24, would they  
2 have received the communications which went out in the  
3 routine course of Coalition business?

4 A Yes. In other words, I recall very  
5 specifically instructing Perrin to make sure we get a  
6 little bulletin out to everybody in the Coalition and  
7 I'm sure he did, at least one or two of those.

8 I don't recall, I didn't write them, but I  
9 have a feeling that we did have a couple of routine  
10 communications to members of the Coalition.

11 Q The United States -- I'm sorry.

12 A Defense Committee.

13 Q What persons associated with that  
14 organization, are involved with the Coalition's  
15 activities?

16 A I don't know.

17 Q And do you know what communications were  
18 made between the Coalition and this organization?

19 A Other than the routine communications to  
20 all members of -- why don't you ask it differently?

21 Why don't you say, are there any communications  
22 with this organization other than the routine

1 communications?

2 Q Why don't we just take your answers subject  
3 to the fact that we have already established that they  
4 have received the other two.

5 A All right.

6 Q The Congressional Majority Committee?

7 A I don't know who is involved in that.

8 Q And the communications between them?

9 A No.

10 Q The Young Americans For Freedom?

11 A This is an organization that provided --  
12 helped solicit some volunteers. And the head of that  
13 is no longer head of it, and I can't recall his name.  
14 But he was -- spent some time in our offices in New  
15 Orleans.

16 Q So it would have been communications  
17 between the Coalition and this organization regarding  
18 volunteers?

19 A Yes.

20 Q Were there other sorts of communication?

21 A I don't think so. The head of it was a  
22 very young man and very enthusiastic. I don't think

1 he was involved in any of the meetings that we held  
2 with the leadership group.

3 Q The Young Conservatives Of Texas?

4 A I don't know.

5 Q You don't know them?

6 A No.

7 Q And you do not know what communications  
8 were between Coalition and this organization?

9 A No.

10 Q And the last on the list, is the Public  
11 Affairs Political Action Committee?

12 A Same story; I don't know who runs that and  
13 what communications we may have had.

14 Q Were any individuals, members of the  
15 Coalition?

16 A Not that I recall. I mean, we did receive  
17 contributions from other individuals. And I think we  
18 should maybe make some kind of explanation as to, you  
19 know, who is a member of the Coalition. A member was  
20 never defined.

21 Organizations were allowed to join by  
22 sending \$100 and we tried to get as many as we could

1 basically, to try to build up the affect that we might  
2 have at the Convention.

3 I suppose one could say that anyone who  
4 contributed time or effort, was a member of the  
5 Coalition. I don't know the names of all those  
6 people. I certainly do know the names of the  
7 individuals who contributed, however, and there were  
8 individuals, several individuals who gave more than  
9 \$100 apiece.

10 Q And who were those individuals?

11 A I can't recall them all. I know Robert  
12 Kreible was one who I mentioned earlier, and who  
13 participated in a few of our meetings.

14 Q When you say that he contributed more than  
15 \$100, how much did he contribute?

16 A I'm not positive. I want to say \$2500.  
17 James Summers, a delegate from Washington State, also  
18 contributed, I think somewhere in that range.

19 Q Of \$2500?

20 A Yes. And there were others, but I cannot  
21 recall who they would be.

22 Q Did the Coalition maintain a list of

1 persons who had contributed?

2 A Yes.

3 Q Would you be willing to provide the  
4 Commission with that list?

5 A I'll discuss that with counsel, but I don't  
6 see any objection.

7 Q After the July 25 --

8 A Would you like the list?

9 Q Yes, please.

10 After the July 25th, 1988 meeting which was  
11 held in Senator Humphrey's office, when did members of  
12 the Coalition meet next?

13 A Well, this gets into this issue of who is a  
14 member. There, as I mentioned, I think there was at  
15 least one other, maybe two other meetings in  
16 Washington of a leadership group.

17 In New Orleans, we held meetings almost  
18 every night during the Convention. And to that  
19 meeting, we invited anyone who agreed with our view  
20 that these conservative issues that were our focal  
21 point, were very important to advocate, in part, as a  
22 means of getting George Bush to select a conservative

1 Vice President.

2 Q When was the first meeting of the  
3 leadership group in Washington D.C. following the July  
4 25th meeting, held?

5 A I couldn't tell you. It's possible that it  
6 would be on my calendar, but I'm not sure.

7 Q Would it be possible for you to obtain that  
8 information for us?

9 A I'll try.

10 MR. DYB: This is the date of the first  
11 meeting subsequent to the July 25th, 1988 meeting in  
12 Washington D.C?

13 MS. REILLY: Right, or in the Washington  
14 D.C. area.

15 BY MS. REILLY:

16 Q Who was at the first meeting that was held  
17 after the July 25th meeting?

18 A I'm not sure. As I said before, I'm not  
19 sure that Senator Humphrey attended all of these  
20 meetings, but the core group were those who I have  
21 listed before. Do you want me to repeat them?

22 Paul Weyrich, Richard Vigeurie, Howard

1 Phillips, myself, and that's basically the D.C. group.

2 Q And where was this meeting held?

3 A As I said before, I recall one meeting at a  
4 hotel in Crystal City and one meeting at our offices.

5 Q I'm confused. Were there two meeting in  
6 Crystal City or one meeting?

7 A I'm not sure, I'm not sure. Again, you  
8 must recognize that CWT was not something that I was  
9 doing fulltime. I have many other responsibilities  
10 and, you know, if I talked to somebody and they said  
11 set up a meeting, I didn't set the meeting up. It  
12 would be on my schedule, but I can't recall how many  
13 meetings there were.

14 It is very possible there was more than  
15 one, in Crystal City. But it doesn't stick in my  
16 mind.

17 Q Was the meeting that you do recall in  
18 Crystal City, what hotel was that held at?

19 A I don't know I don't remember. They all  
20 look alike.

21 Q Who paid for the room in which the meeting  
22 was held?

1 A I think the Coalition did.

2 Q How much was the rental for that?

3 A Oh, gosh, I don't know.

4 Q Do you have receipts regarding?

5 A I'm sure we did.

6 Q Would you be willing to produce those to  
7 the Commission?

8 A Surely. And there were receipts, would be  
9 all receipts from that meeting, including parking,  
10 rental, refreshments, meals, lodging, et cetera.

11 Q What was discussed at that meeting?

12 A I would expect the same things that were  
13 discussed at other meetings. We would talk about what  
14 activities would be appropriate for the Coalition to  
15 be effective; how we could mobilize additional support  
16 to impress on the President or the expected  
17 presidential candidate, the importance of these  
18 issues, and how they would impact on his election.

19 Q What activities were determined to be  
20 appropriate ones for the Coalition to engage in?

21 A Most importantly, as I mentioned, getting  
22 office space, getting staff and getting office space

1 in New Orleans.

2 Q Were there any activities which were  
3 rejected by the group as being inappropriate for the  
4 Coalition to engage in?

5 A Other than as I've mentioned, naming names  
6 and making it appear as if the CWT was a stalking  
7 horse for the vice presidential candidate.

8 Q What criteria was important to CWT  
9 regarding an acceptable vice presidential candidate?

10 A As our newsletters, news releases said,  
11 these issues related to tax increases, right-to-life,  
12 strategic defense initiatives, right-to-bear-arms,  
13 federal spending defense strategic defense  
14 initiatives. I think United States African Policy was  
15 mentioned.

16 Q Did CWT conduct any research regarding what  
17 candidates supported those issues?

18 A That's a good question. I don't think so  
19 because as I said, we sought to not associate  
20 ourselves with any of those candidates, and to stress  
21 the issues. For example, when the press would call,  
22 and I took several of those calls, you know, they

1 would say, "well, who is acceptable to you"? And I  
2 would say, "people who support these issues". "Well,  
3 who is that"?

4 A Well, look up their record.

5 Q Did CWT look up their record?

6 A Not that I recall. The candidates  
7 because -- I mean, lets just take three of these  
8 issues: Strategic defense, tax increases, and  
9 right-to-life. None of these people's position was  
10 very vague. It was relatively common knowledge where  
11 various people whose names had been brought forth for  
12 being possible vice presidential candidates, where  
13 they stood.

14 So I don't think that I would have taken  
15 obviously, very scarce staff time to do that kind of  
16 research.

17 Q Did For The Eagle do any sort of research  
18 like that for the Coalition?

19 A No. Free The Eagle's primary interest is  
20 economic and we really don't get informed in SDI. We  
21 did -- I did one little thing on SDI.

22 But taxes was our big issue. And we were

1 sponsors of something called the pledge. We lobbied  
2 members of Congress to sign a pledge saying that they  
3 would not vote for tax increases. And as a result, we  
4 certainly knew who signed that pledge and who didn't.

5 Q Did the Coalition For A Winning Ticket do  
6 anything in general, in terms of research?

7 A I'm not saying, it didn't. Well, I mean,  
8 when you say, "polling delegates", I don't even think  
9 we did much on polling delegates. That would be a  
10 form of research finding out what people are. It is  
11 not impossible and I'd have to go through our records  
12 too.

13 Q Is there someone would who know the answer  
14 to that?

15 A I don't think so.

16 Q Would Mr. Perrin.

17 A He might. Dan would be the logical one who  
18 would get that job if we if I gave it to him. I  
19 should point out that people like Phylis Schlafly  
20 would know off the top of her head.

21 Q She would know off the top of her head --

22 Q Everybody involved in the right-to-life

1 issue. Dan Graham, as Chairman of High Frontier,  
2 would know off the top of his head everything anybody  
3 said on strategic defense.

4 Q During the time that the Coalition was  
5 operating, was ever there ever an instance where there  
6 was confusion over a candidate's position on one of  
7 the major issues that you've mentioned?

8 A There wasn't that much attention given to  
9 individual opinions. Lets just say, hypothetically,  
10 that someone put forth the name of a congressman who  
11 we didn't know. That question would have been  
12 responded in the following way: We don't give a damn;  
13 that we're pushing issues and we don't want to get  
14 involved in critiquing anybody's voting record. It  
15 was a very clear consensus.

16 And I can't even, you know, I can recall a  
17 conversation which went something like this: What are  
18 you going to say if somebody asks you about Dole? The  
19 answer was, our issues, these are our issues and we  
20 look at them. And Bob Dole is a good friend of mine,  
21 but I'm not going to get involved in this. And that  
22 was kind of the concensus approach that we had for

1 these things.

2 The one time that Senator Humphrey did, was  
3 goaded into making those things, he kind of apologized  
4 to us and said, "I didn't know what else to do". He  
5 certainly was not acting in conjunction with the  
6 policies that we had agreed on in our meetings.

7 Q Were there other instances where a specific  
8 candidate was named by a member of the Coalition?

9 A The only instance I can think of was after  
10 Vice President Quayle was named and Senator Humphrey  
11 did release a public statement saying that he met the  
12 issue of criteria of the CWT.

13 Q And when was that?

14 A After Bush had named him.

15 Q Was it prior to Senator Quayle's nomination  
16 by the Convention?

17 A Well, yes. Bush named Quayle a day or two  
18 before the convention, formerly nominated him.

19 Q And did Senator Humphrey issue this  
20 communication on the letterhead, or as a figure of the  
21 Coalition?

22 A I think he did, yes.

1 Q Did the Coalition maintain a list of  
2 candidates who were unacceptable?

3 A No.

4 Q Was there a list of candidates who were  
5 acceptable?

6 A No. As I said, every time we met and the  
7 issue of naming names came up, it was agreed that we  
8 were not going to get involved in that. Not only, you  
9 know, I think it is fair to say that there were many  
10 different people that individuals who are associated  
11 with members of the Coalition had as a favorite. And  
12 if in fact the Coalition got involved in this, we  
13 would risk alienating, you know, I'm sure that -- lets  
14 see, one name that was not really talked about which  
15 might have been, was John Tower. Dan Graham, Chairman  
16 of High Frontier, is a political enemy of Senator  
17 Tower.

18 Now, if in fact, we had said that Tower was  
19 honky-dorky, we would have risked alienating  
20 Senator -- General Graham. And we all agreed we  
21 didn't want to get involved in that. And I'm trying  
22 to think of anybody that was particularly associated

1 with any other individuals. And I don't see anybody  
2 offhand, but if there were, we would have said, you  
3 can't do that because you are going to step on  
4 so-and-so toes. And so that is the way we operated.

5 Q Did any of the members of the Coalition  
6 lobby for various candidates outside the Coalition?

7 A As I said, I'm sure they had their  
8 favorites, and I wouldn't be surprised if they did do  
9 that. I know that there were -- no, I remember one  
10 meeting of the Coalition, there was a delegate from  
11 Oklahoma there, and he was a delegate who was selected  
12 to vote for Pat Robertson at the convention. Now, he  
13 said he would prefer Robertson as Vice President too,  
14 and I gave him the same story. I said, you know, our  
15 purpose is to push issues here.

16 If we take a higher profile on Robertson or  
17 anybody else, we are going to lose our ability to  
18 influence this thing. And people were pretty  
19 cooperative; not everyone obviously. There were -- I  
20 don't think there was at any time we had a majority,  
21 or even a significant minority, of delegates that  
22 embraced simply, our position.

1 Q Did you have a particular candidate that  
2 you were lobbying for, personally?

3 A Personally, no. I guess, you know, first  
4 of all, I was wearing two hats as it was. I had  
5 responsibilities to lobbying operation on behalf of  
6 Free The Eagle, on the Platform. And then I was, you  
7 know, I agreed to administer CWT, and just couldn't  
8 get involved in these things. I had friends that were  
9 involved in like the Republican National Committee.  
10 But I attended no meetings down there and I would not  
11 be surprised if I had asked a delegate who he would  
12 support. But no concerted action.

13 Q Was Senator Humphrey lobbying for any  
14 particular vice presidential individual?

15 A Not to my knowledge.

16 Q Did you have any discussion with him  
17 regarding who he would prefer to see as a vice  
18 presidential nominee?

19 A I'm trying to figure it out. We may have,  
20 we may have. And it would have been along political  
21 grounds on issues. I can't recall his comments  
22 exactly, if he did.

1 Q Did this occur --

2 A This obviously would not be a subject that  
3 one would be surprised to have come out in  
4 conversation.

5 Q But this would have occurred in New  
6 Orleans?

7 A Yes.

8 Q Did you have any discussion with Dan Perrin  
9 regarding who Mr. Perrin was supporting?

10 A Possibly.

11 Q Would this be in New Orleans?

12 A Yes.

13 Q Did any of these discussions occur during  
14 meetings of the Coalition?

15 A I don't think so. When you say, "meetings  
16 of the Coalition", again, when you talk about the  
17 large meetings that were held in New Orleans, or the  
18 leadership group, there certainly was much more  
19 diversity among the delegates and alternates that  
20 attended our meeting, the larger meeting that we held.

21 But I think it is fair to say, that Senator  
22 Humphrey and others reiterated the position that we

1 couldn't act as a force for any individual. And I  
2 don't think there was a lot of dissent from that. It  
3 was issues oriented.

4 Q Did CWT have plans to oppose the nominee  
5 who did not meet the issues?

6 A No.

7 Q No plans?

8 A There was discussion. One person, member  
9 of press said, "would you walk out"? And I think that  
10 question was dodged. In fact, I don't think we had  
11 any leverage to enable us to exercise those kinds of  
12 activities. So the answer is no, we didn't.

13 Q We've previously discussed, Free The  
14 Eagle's support of the CWT, and I would like to return  
15 to that for a few moments.

16 Did CWT have its own phone number in  
17 Washington?

18 A I'm trying to remember. We talked about  
19 it. But I don't think so. I think they used our  
20 phones.

21 Q They used the phones that Free The Eagle --

22 A Yes.

9204092782

1 Q Were they listed in the DC phone book or  
2 directory?

3 A Only if they had their own phone number.  
4 Oh, I think that we did give them a phone line. Now,  
5 what I think would be relevant here, is whether or not  
6 we charged them for it because I think we did give Dan  
7 a separate line that we had, an extra line that we did  
8 turn over to CWT.

9 Q The phone line which you turned over, did  
10 you change it in the directory or was it informally?

11 A I think it was informally.

12 Q And was CWT charged for the use of the  
13 phone?

14 A That is what I don't know.

15 Q And could you provide us with that  
16 information?

17 A Yes.

18 Q And how many Free The Eagle employees  
19 provided services to the Coalition?

20 A As I said, in Washington, the primary thing  
21 I think was receptionist. Now we did -- there is  
22 another - we did use Free The Eagle staff to develop a

1 newsletter which was distributed in New Orleans. And  
2 that was Brad Sant, and his time was reimbursed. We  
3 know the Coalition did pay him back. And I think  
4 there was some additional hours. For example, one  
5 fellow who did the books, handled the books for CWT,  
6 we billed his hours to CWT so that we could keep them.

7 Q So, it is fair to say, that some employees  
8 of Free The Eagle were --

9 A Performing services for CWT.

10 Q And were paid for them?

11 A And Free The Eagle was reimbursed for the  
12 hours that our employees spent.

13 Q The newsletter that Mr. Sant put out, how  
14 many newsletters were put out?

15 A I'm not sure. Lets say 5,000. I think  
16 that is a good number.

17 Q And how many additions?

18 A One.

19 Q Just one single one?

20 A Yes.

21 Q And where were they distributed?

22 A New Orleans.

1 Q And what were -- how many pages were they?

2 A Six or eight.

3 Q What sort of material was contained in it?

4 A It was basically tabloid size on news

5 print. It had some pictures of Senator Humphrey, had

6 contained an appeal for support from delegates. I

7 think it contained an open letter to delegates which

8 was based on the letter that he did send to delegates;

9 had a statement of principle, announced our offices;

10 and I'll be glad to provide a copy.

11 Q That would be helpful, a copy of that  
12 newsletter.

13 Q And did Mr. Sant do that work for this  
14 newsletter in D.C.?

15 A Yes, that's right.

16 Q And when was the newsletter distributed?

17 A In New Orleans.

18 Q Before the delegates arrived, or as they  
19 were arriving?

20 A I think, starting during Platform Week?

21 Not all the delegates were down there for that.

22 Q What is Free The Eagle's gross receipts;

for example, 1988?

A I think about a 1.2 million.

Q And what in general, are the funds spent on?

A Primarily, lobbying, and educational efforts.

Q Does Free The Eagle support any political candidates?

A No.

Q Does it endorse any political candidates?

A No.

Q Is it associated with any causes other than the ones that you named, being economic issues?

A Well, other more tangential projects that we were involved in include, interstate collection of sales tax, Tort reform, and Medicare taxation -- yes, taxation of Medicare.

Q Now, does Free The Eagle have membership dues?

A No, it is a -- there are no members in the organization. It is supported by direct mail fundraising.

Q And who is your direct mail fundraiser?

A Well, Bill Jacobs, our Treasurer, supervises, works directly with mail houses with a list management firm that handles our lists. He has a couple of people who do most of that inhouse. He also is in charge of getting our own mailing out that we do not contract out.

Q Now, what mailings would you do yourself, what types of mail?

A Basically mailings of 5 to 10,000 at most. We have approximately 60,000 regular supporters and mailing to that group. We can't do inhouse, it's too big. We cannot mail to the entire group. That would be too big a job.

Q And is there one direct mailing firm, Free The Eagle uses?

A We have a contract with Ann Stone & Associates, which manages many of our direct mail packages.

Q And how long does has that contract been in existence?

A I'm going to say, four or five years.

1 Q And do you own your own mailing list?

2 A Yes, we do.

3 Q And who is responsible for developing it?

4 A Maintaining it?

5 Q Yes.

6 A Mr. Jacobs and his staff.

7 Q And does Free The Eagle have any part-time  
8 employees?

9 A No, not that I recall right now.

10 Q Any persons who volunteered for it?

11 A No; wish we did.

12 Q And how often in a year would it conduct  
13 fundraising activities?

14 A Continually.

15 Q And how many fundraising drives would you  
16 have in the course of a year?

17 A We don't separate them out by drives. We  
18 have general appeals that go out at least once a month  
19 but then we will get involved in project development  
20 as I described, relating to the IMF, and try to raise  
21 funds for specific activities.

22 Q Has Mr. Perrin ever worked for Free The

1 Eagle?

2 A No, he has never worked for Free The Eagle  
3 except with the CWT issue.

4 Q Now, when CWT was set up, was a separate  
5 bank account established for it?

6 A That's right.

7 Q And where was that established?

8 A At 1st American.

9 Q And who established the account?

10 A Well, I think I did. I mean, I walked over  
11 there. I think we had -- the checks show two people  
12 on them, the signature. Yes -- no, that is somebody  
13 else on the back. That is Dan Perrin's. That is Dan  
14 Perrin's signature. Some I prepared myself.

15 Q Mr. Perrin and you established the account?

16 A Yes.

17 Q Were both of you required to sign checks?

18 A Yes.

19 Q What was the name that the account was  
20 opened under?

21 A That's a good question. Is it in the  
22 check?

92040922789

1 MR. DYE: No it's not. They are counter  
2 checks.

3 A I don't know. I can't tell, I'm sorry. It  
4 may have been.

5 Q Could it also have been under, Free The  
6 Eagle?

7 A It could have been something like CWT, FTE,  
8 or something like that.

9 Q What was the account number on the check?

10 A 3456463.

11 Q Is this account still in existence?

12 A Yes.

13 Q It is. Does it currently have a balance?

14 A A few hundreds dollars.

15 Q Are you currently receiving bank statements  
16 for it?

17 A Yes.

18 Q Would you be willing to provide the  
19 Commission the bank statements?

20 A I think we have it. If counsel has no  
21 objection, I don't have any objection.

22 Q Who was responsible for depositing funds

1 into the account?

2 A Good question. I think Mr. Perrin,  
3 usually; sometimes, Mr. Jacobs.

4 Q Did you ever deposit checks?

5 A I don't think so.

6 Q And when was the account opened?

7 A In July.

8 Q Was it opened before the July 25th meeting,  
9 or after?

10 A I don't know, I don't think so.

11 Q You don't think that it was open --

12 A No. The meeting we had in Senator  
13 Humphrey's office was the meeting at which I agreed to  
14 do this if I could take it on as a project of Free The  
15 Eagle. And it was after I had submitted this proposed  
16 budget, that funds started to be raised, and I  
17 remember because Mr. Perrin had been working for a  
18 while and had not gotten paid and was griping. So it  
19 was after that meeting.

20 Q Did you condition your involvement with CWT  
21 in the premise that it had to be done as a project of  
22 Free The Eagle?

1           A        Yes. I basically conditioned it on the  
2 premise that it was not a political action committee  
3 and that it was legal and appropriate for us to take  
4 it on as a project.

5           Q        Would you have been willing to be involved  
6 with the Coalition, if it was not a project of Free  
7 The Eagle, but an entity, separate from it?

8           A        I think so. If it was a political action  
9 committee, I would have been very hesitant.

10          Q        And when was that?

11          A        When I took over Free The Eagle, and Ruff  
12 Pac at the request of the Chairman and its Board, I  
13 insisted on a financial and what I call a legal audit  
14 of those organizations. And it was advise of counsel,  
15 that it was smart to separate those organizations,  
16 separate the Board and Management, so that there was  
17 after I had made those recommendations to the Boards  
18 of these organizations, they took those actions.

19                   And so I was still, you know, it was very  
20 fresh in my mind that you don't want to get involved  
21 in a Pac if you are running a C-4.

22          Q        Did Free The Eagle advance any funds to

1 CWT?

2 A Insofar as it was not reimbursed  
3 immediately for services provided, I guess you could  
4 say it did.

5 Q Did it pay for any of the mailings that CWT  
6 put out?

7 A We'd have to look at the dates when postage  
8 was paid for and when mailings went out.

9 Q At this, I'm going to ask you to turn to  
10 Exhibit One and ask you to look at the top of page  
11 three and see if we can refresh your recollection on  
12 this.

13 A Oh, okay, I guess that explains it there.  
14 So the mailing went out before they got  
15 funds.

16 Q Who would at Free The Eagle, authorize the  
17 payment for all of the mailings?

18 A I would.

19 Q So you would have been the individual who  
20 authorized the payment for this?

21 A That's right.

22 Q And when was Free The Eagle reimbursed for

1 these?

2 A I don't know.

3 Q Would Free The Eagle have done so by check?

4 A Paid for the mailing and postage --

5 Q I'm sorry. Would the Coalition For A  
6 Winning Ticket, have reimbursed Free The Eagle, by  
7 check?

8 A Yes, they would have.

9 Q And would you be willing to provide us with  
10 a copy of that check?

11 A Sure. If you are going to get all the bank  
12 statements, you will get that too.

13 Q Did Free The Eagle advance any other funds  
14 to CWT?

15 A I'm not sure. I'm trying to think of --  
16 the only other major expenditures of the rental of the  
17 office space in New Orleans. I'm not sure exactly how  
18 that was handled. It is not impossible that funds  
19 were advanced for CWT.

20 Q Returning to the funds that were advanced  
21 for the mailings at the time that they were advanced,  
22 was there an agreement as to when they would be

1 repaid?

2 A No.

3 Q Any terms of how they would be repaid?

4 A No, just that they would be.

5 Q Was any interest charged on the advanced?

6 A I don't think so.

7 Q I'm going to ask you if you would please

8 turn to to what has been marked as page nine, of

9 Exhibit One of your Interrogatory response, and ask

10 you to take a moment to review this document please?

11 A The check?

12 Q Right.

13 A Well, it could have been this issue of  
14 rental for the offices. I bet you that is what that  
15 was. I'm not positive.

16 Q What I would like to ask you to do if you  
17 could is just run over the check itself. We know  
18 there is no payer in the upper lefthand corner.

19 Were the checks that CWT used, did they  
20 have payers in the upper left corner?

21 A When the bank account was opened, they give  
22 you a dozen checks without anything on them, just the

920409 [2] 2795

1 account number printed on them, and my guess is that  
2 this is one of those.

3 Q And ultimately, did you receive checks that  
4 had the account name printed on it?

5 A I don't know.

6 Q But we'll be able to determine that when we  
7 receive copies of them?

8 A That is correct.

9 Q And you previously testified that two  
10 persons were required to sign each check?

11 A That's right.

12 Q And the signature on the signature line,  
13 the first one, is that your signature?

14 A That's right.

15 Q And the the second one, do you know whose  
16 signature that is?

17 A Yes, that is Dan Perrin's.

18 Q Now, did CWT send out mailings to  
19 individuals?

20 A Yes. I think it's discussed in here.

21 MS. REILLY: I want the record to show that  
22 the witness is on page three of the Interrogatory

1 Response.

2 Q What I'm going to do at this juncture, if  
3 we could introduce Exhibit Two. I'm going to hand one  
4 to the court reporter, and ask her to mark it please,  
5 and one to the witness and to the witness's counsel,  
6 and ask you to take a moment and exam this, please.

7

---

8 (Whereupon a document was marked as  
9 Deposition Exhibit Number 2).

10 Q Have you examined this document?

11 A Yes.

12 Q This purports to be a letter addressed to  
13 "Dear Fellow Conservative".

14 In the letterhead of the Coalition signed  
15 by Senator Gordon Humphrey, Senator Humphrey is  
16 identified in the top of the letterhead as the  
17 Chairman and the letter requests \$250 for a project to  
18 convince George Bush to pick a conservative as his  
19 running mate if we are to defeat Michael Dukakis.

20 Mr. Segermark, is this a mailing which the  
21 CWT put out?

22 A Yes.

1 Q And when was this mailing made?

2 A Early August.

3 Q And to whom was it sent?

4 A It's a mailing list purchased from Richard  
5 Vigeurie to known contributors to conservative causes.

6 Q And who was the owner of the list?

7 A Vigeurie & Company.

8 Q And did you buy it, or did you lease it?

9 A It was purchased.

10 Q And do you currently -- let me back up --  
11 who purchased the mailing list?

12 A CWT?

13 A And is this mailing list currently owned  
14 by CWT?

15 Q No. When one purchases things like this,  
16 you really only purchase one use of the list. And so  
17 we received the mailing labels which were put on  
18 printed letters in our offices and then mailed from  
19 there.

20 Q And how was it determined what persons  
21 received this?

22 A We were assured that this mailing list was

1 of known donors to conservative causes.

2 Q Did you receive any response to this  
3 mailing list?

4 A Very few.

5 Q And why is that?

6 A Lousy list. Maybe lousy letter too.

7 Q Who wrote the letter?

8 A Richard Vigeurie and Dan Perrin and Senator  
9 Humphrey.

10 Q Were you involved in the writing of the  
11 letter?

12 A Might have been. I'm not a particularly  
13 good writer.

14 Q The letter references a press release which  
15 was included with this. Your Interrogatory Response  
16 indicates that this is included in Exhibit A, which is  
17 page five. I want to ask you to take a moment and  
18 review that, please.

19 A This says, that Kapstone provided the  
20 mailing list. I thought Vigeurie was involved with  
21 that. Maybe I was wrong. This is confusing too.

22 Q Have you had a chance to review this

1 document?

2 A Yes.

3 Q This purports to be fo an Exhibit A, page  
4 five, press release, the statement of Senator Gordan  
5 J. Humphrey, Chairman of Coalition Of a Winning  
6 Ticket dated August 4th, 1988 discussing the  
7 announcement that 25 member organizations and 48  
8 leaders banning together to convince George Bush to  
9 select a conservative vice presidential nominee.

10 Is this the press release which was  
11 included?

12 A I'm sure it is.

13 Q And how much money was spent for this  
14 mailing addressed to "Dear Fellow Conservatives"?

15 A I think the figure on page three of the  
16 response to your Interrogatories was correct,  
17 \$3,666.68.

18 Q And why was Senator Humphrey selected to  
19 sign this mailing?

20 A He was Chairman.

21 Q And --

22 A Well, it was felt that he would be

1 successful in helping raise the money we needed to  
2 spend.

3 Q Now, you testified that the mailing did not  
4 generate a good deal of money?

5 A That's right.

6 Q How many persons responded to the mailing?

7 A I'm not sure, probably six, eight.

8 Q The last paragraph of the letter requests  
9 the person it is addressed to, to contact Senator  
10 Humphrey in New Orleans, or to contact Executive  
11 Director, Dan Perrin.

12 Was Mr. Perrin the Executive Director for  
13 Senator Humphrey, at this time?

14 A No, it was a title we gave Dan.

15 Q And it was his position as Executive  
16 Director of CWT?

17 A He had that title, that is correct.

18 Q Did he have that title in his employment  
19 with Senator Humphrey?

20 A I'm not sure he was employed by Senator  
21 Humphrey.

22 Q He was not employed by Senator Humphrey.

920409[22801

1           A       I'm not sure.

2           MR. DYE: I think he's already testified  
3 that he wasn't, didn't think that he was at the time  
4 he was doing this.

5           BY MS. REILLY:

6           Q       Well, had he previously been employed by  
7 Senator Humphrey?

8           A       Not to my knowledge.

9           MR. DYE: Wait a minute., I think you did  
10 say earlier- make sure it is clear --

11          THE WITNESS: Is Dan employed by Humphrey?

12          MR. DYE: That Dan had been something with  
13 Humphrey prior to the formation of CWT.

14          THE WITNESS: No, I think he was on the  
15 Senator's staff, but not Humphrey's.

16          BY MS. REILLY:

17          Q       Do you know whose staff he was on?

18          A       I think he was on Senate Foreign Relations  
19 Committee staff, or was at the time. I have not  
20 talked with Dan in some time. I don't know where he  
21 is.

22          Q       Did Senator Humphrey receive any calls in

1 New Orleans from persons who had received this letter?

2 A I think so.

3 Q Did you discuss with Senator Humphrey, the  
4 calls which he received?

5 A Not to my recollection. There was not a  
6 whole lot of time to do things like that.

7 Q Did you discuss with Dan Perrin, calls  
8 which Dan received?

9 A I don't know if I did. It's hard to say  
10 when you receive a call, what the generation of it  
11 was. The Coalition had many phone lines and we were  
12 getting calls from around the country, but it was  
13 primarily as a result of the press that was generated,  
14 not because of this letter.

15 Certainly, the financial response would  
16 indicate that we weren't getting many phone calls  
17 either.

18 Q I'm going to ask you if you would please to  
19 turn to page 18 of Exhibit One and ask you to take a  
20 moment and review this document.

21 This purports to be a letter addressed to  
22 "Dear Delegate", dated August 1st, 1988, signed, "with

1 best regards, Gordon" -- it is not signed but  
2 indicates a signature to be placed on it, "Best  
3 regards, Gordon Humphrey". No letterhead on it. It  
4 discusses the Republican National Convention,  
5 formation of CWT, and requests support from delegates.

6 Mr. Segermark, did the Coalition also put  
7 up this letter?

8 A I think it did. I think this is the letter  
9 that Senator Humphrey sent to the delegates.

10 Q And was it on letterhead?

11 A Yes.

12 Q And do you have a copy of this letter on  
13 letterhead?

14 A I don't.

15 Q Would you be able to locate one for us?

16 A I don't know.

17 Q What letterhead was --

18 A My guess was this was generated from  
19 the computer because we couldn't find an exact one.

20 Q What letterhead would have been used?

21 A Coalition.

22 Q And when was this letter sent?

1           A       Well, August 1st is the date and I think  
2 that is probably right?

3           Q       And how many letters were sent?

4           A       I think there is some discussion in the  
5 response to the Interrogatories about that. Mailing  
6 to the delegates pending convention, total number of  
7 letters mailed was 4,946.

8           Q       And the cost of this mailing, figured in  
9 your Interrogatory Response, was \$1,591.20. Is that  
10 correct?

11          A       That sounds right.

12          Q       Where did CWT obtain the list of delegates  
13 from?

14          A       I think the Republican National Committee,  
15 but I'm not sure.

16          Q       And who would have obtained them from the  
17 Republican National Committee?

18          A       Dan would have obtained the list.

19          Q       Did the Republican National Committee  
20 assess a charge for the furnishing of a name?

21          A       Not to my knowledge.

22          Q       Does the Republican National Committee

1 routinely furnish the names of the delegates and their  
2 addresses?

3 A That's my understanding.

4 Q So this mailing was not made off of a list,  
5 is that correct; just in terms of a commercial vendor?

6 A No, that's right, it was not a commercial  
7 list.

8 Q And what vendors did the Coalition use to  
9 put out this mailing?

10 A I think just a little local print shop.

11 Q And who did the Coalition use to drum up  
12 mailing labels?

13 A I'm not sure.

14 Q Did they use mailing labels?

15 A I'm sure we did. It's possible. I mean,  
16 that's how the list came to us, in the form of labels.  
17 But again, Dan was involved in this and I don't know  
18 exactly how he obtained them.

19 Q So correct me, but it was a list of labels  
20 which you received which were ready to go into  
21 envelopes?

22 A That is my recollection.

1 Q And who wrote this letter?

2 A I'm sure Senator Humphrey, and Dan, were  
3 involved in this, but and I may have been involved in  
4 it too.

5 Q Any one else who would have been involved  
6 in it?

7 A Possibly, but, I doubt it.

8 Q Did Senator Humphrey sign it?

9 A Oh, yes, he would have final clearance on  
10 it, certainly.

11 Q How much money did this mailing raise?

12 A I don't think this raised any money at all.

13 Q None at all?

14 A The Interrogatory may have something, but  
15 no.

16 Q Did this mailing go to anyone other than  
17 delegates?

18 A I think it went to alternates. I'm not  
19 sure; 4800 is a lot for just delegates.

20 MR. DYE: How many delegates were there?

21 THE WITNESS: It probably went to  
22 alternates too.

1 BY MS. REILLY:

2 Q And was a reduced rate used for postage?

3 A No.

4 Q So the postage was 25 cents per letter?

5 A I'm sure it was, because I recall some  
6 discussion, and I said, we don't have time to go try  
7 to get a mailing permit, and all that stuff.

8 Q So CWT doesn't have a mailing permit?

9 A No.

10 Q And CWT didn't use Free The Eagle's Permit?

11 A No, they can't. It is my understanding that  
12 you can't. You have to have your return address on a  
13 letter when you use your mailing permit.

14 Q Regarding the "Dear Delegate" letter, were  
15 any enclosures included with it?

16 A Sure. There is a response on page 19.

17 Q And this is a response to voice that  
18 request of financial support?

19 A That's right.

20 Q Was anything else included?

21 A I would think that there would be a  
22 business reply in the envelope, but none was included

1 here. I would think that there would be.

2 Q And would the business reply envelope be  
3 stamped?

4 A No.

5 Q Nothing stamped?

6 A On page 7, there is a business reply  
7 envelope that was enclosed with a solicitation to  
8 donors. And it says, "place stamp here".

9 Q Did anyone call CWT and ask if there were  
10 any limitations on the amount of money on which they  
11 could give?

12 A I think this may have come up, but -- and  
13 the answer was, that this is a project of Free The  
14 Eagle, and there are no limitations on donations.  
15 They do point out that they are not deductible on the  
16 series of direct business connections.

17 Q Did anyone seek advice regarding whether  
18 corporations could make contributions?

19 A Corporations can only contribute to a  
20 lobbying organization and deduct it, if, it is  
21 involved -- if the lobbying was directly related to  
22 the business involvement. And I don't think we had

920409 [2] 2809

1 any political contributions on that.

2 Q I'm going to ask you, if you would please,  
3 turn to page eight which is marked as Exhibit B, and  
4 ask you to take a moment and review this  
5 documentation, please.

6 Have you reviewed this document?

7 A Yes.

8 Q This purports to be Exhibit B to the  
9 Interrogatory Response and is entitled: "Cost  
10 Breakdown of Coalition for A Winning Ticket. Exhibit  
11 A, Mailing".

12 And what essentially we're going to do is  
13 run through the figures here if we could. If you  
14 could turn to page nine of this exhibit which is the  
15 next page, which purports to be a check to 1st  
16 American, dated August 9, 1988 in the amount of  
17 \$1,255.00, the purpose for which is dated as a  
18 cashier's check. And if you turn back to page eight;  
19 is this the amount of money which CWT spent for  
20 postage as indicated by your Interrogatory Response?

21 A That looks logical, yes.

22 Q And at page 11 and page 13 of this

92040922810

1 Response, checks paid to the order of Capstone in the  
2 amount of \$425 and \$125 which would total \$550; would  
3 that be related to what you indicated was the mailing  
4 list on page eight, for \$550?

5 A That looks correct.

6 Q Now, at page 15 of this Response, is a  
7 check dated August 11, 1988 to CNB International  
8 Corporation, in the amount of \$5,595.18, the purpose  
9 of which is indicated for printing and mailing.

10 Your response to Exhibit B indicates that  
11 CNB International was paid \$1,861.68 for the Exhibit A  
12 mailing.

13 A Right.

14 Q Were there any other mailings which were  
15 paid for, using this check for \$5,595.00?

16 A I'm sure that includes the newsletter I  
17 talked about, 5,000 copies of that. It may have also  
18 included stationary, press release forms and stickers,  
19 though I'm not sure. We could be certain.

20 Q Would it be possible for you to provide the  
21 documentation evidencing the total amount paid for  
22 this check?

1 A Sure.

2 Q Thank you.

3 I was wondering if we could clarify  
4 something please. If you could return to Exhibit Two,  
5 which is the short two-page Exhibit, and in the third  
6 paragraph, it notes a press release that was issued in  
7 the Senate Press Gallery. And then, your  
8 Interrogatory Response references at Exhibit A, as  
9 this being the press release that the Senator was  
10 talking to.

11 A Right.

12 Q This is the press release that went with  
13 that letter, the press release dated August 4th, 1988?

14 A I'm almost sure that is it because it does  
15 list those issues.

16 Q Did CWT issue any other press releases?

17 A I'm sure it did.

18 Q How many, would you say?

19 A I'm not certain.

20 Q More than six?

21 A During the Platform and Convention Week, we  
22 were issuing a lot of releases.

92040922812

1 Q Daily?

2 A Maybe not quite daily, but almost daily.

3 So five to ten more, I think would be a number that  
4 was more logical.

5 Q How much money did CWT raise?

6 A At last count, it was \$36,940.00

7 Q Are you still counting?

8 A If we incur additional debts because of  
9 this action, we are going to probably try to raise  
10 some addition money.

11 Q And how did you raise this money?

12 A Individual solicitation from -- and I think  
13 Senator Humphrey was involved in this, primarily,  
14 solicitations down in New Orleans from individuals;  
15 and then his personal contacts.

16 Q Were there any other fundraising letters  
17 used by CWT, other than the two that we have discussed  
18 today?

19 A Not to my recollection. I don't think so.

20 Q And you testified that one letter raised  
21 between \$300 and \$400. The other raised nothing. So  
22 the rest of the money was raised through --

1 A Individual and telephone solicitation.

2 Q Now, who at CWT, was doing telephone  
3 solicitation?

4 A As I said, mostly, Senator Humphrey raised  
5 these things, personally, down in New Orleans and done  
6 over the phone. A better -- I think, if, in fact once  
7 you get the list of donors, it would be relatively  
8 easy to pick out those larger contributors and how  
9 they decided to make donations. I think most of them  
10 were from Senator's Humphrey's personal requests.

11 Q So, it is fair to say that the bulk of  
12 funds were received due to Senator Humphrey's  
13 solicitations.

14 A Yes.

15 Q Did you make any solicitations?

16 A I think I did, automatically.

17 Q In New Orleans?

18 A Yes.

19 Q In D.C., too?

20 A No. I don't recall in D.C. but, I mean, in  
21 conjunction with discussing our activities, it would  
22 be normal for me to say, can you help us. And I don't

1 recall if anybody ever responded positively, but I  
2 tried.

3 Q Did you ever receive any checks on behalf  
4 of CWT?

5 A It's possible, but I don't recall  
6 specifics.

7 Q Did Senator Humphrey do any solicitation  
8 from Washington D.C.?

9 A I'm sure he did.

10 Q And did he use CWT's office to do that?

11 A I don't think he did.

12 Q From where did he solicit from?

13 A I'm not sure, either his home, or his car,  
14 or his office.

15 Q Now, you've testified that CWT maintained  
16 their offices in New Orleans?

17 A That's right.

18 Q And where were their offices located?

19 A At 1100 Poydras Street.

20 Q And that would be suite 1205?

21 A That's right.

22 Q And was that located in close proximity to

92040922815

1 the Convention?

2 A That's right.

3 Q And how close was it to the Convention?

4 A It was across the street from the main  
5 convention hotels.

6 Q Did CWT share these offices with anyone  
7 else?

8 A Free The Eagle, I think, Free The Eagle was  
9 reimbursed for some space there, because I had a  
10 couple of my staff down in New Orleans working on the  
11 Platform project, and I think we reimbursed CWT for  
12 some space. I'm not positive.

13 Q Was there a lease agreement that CWT sent?

14 A We rented for, I think, it was just a two  
15 week rental from the building management firm, and we  
16 paid in advance. And I don't think there was a formal  
17 lease.

18 Q And did CWT make the payment out of its own  
19 bank account?

20 A I'm not sure. It is not impossible that I  
21 had a FTE check and gave it to them, and then was  
22 reimbursed by CWT.

1 Q Would it be possible for you to provide us  
2 with a check copy for the suite at New Orleans?

3 And how much space was there in that suite?

4 A Very small. I would say about twice this  
5 room. This would be maybe 600 square feet and this  
6 one is about 300 feet. So maybe 600 square feet.

7 Q And how many Free The Eagle staffers, first  
8 came down with you?

9 A Three.

10 Q And how much space were they allocated?

11 A They weren't allocated space. It was when  
12 they had to, they could come by. No one had permanent  
13 desks except Senator Humphrey, and Dan had a desk.

14 Q Was it just one room?

15 A One big room and one very small room which  
16 we called the Chairman's office.

17 Q That was used by Senator Humphrey?

18 A No, it was used by anybody when he wasn't  
19 there.

20 Q Did CWT had a telephone there?

21 A Yes, they did.

22 Q And were they listed in the phone book?

1           A        I don't know; not in the phone book, but  
2 information.

3           Q        And they had a Fax machine, as well?

4           A        That's right.

5           Q        And who paid for the Fax machine?

6           A        If not paying directly, then, FTE was  
7 reimbursed for all these expenses.

8           Q        And the same would hold true for the  
9 telephone, the Fax machine and the rent.

10          Q        There was a television in there and there  
11 was a couple of rental computers. And then table and  
12 folding chairs, which I think the building gave us the  
13 table and folding chairs.

14          Q        Approximately, how much money did CWT spend  
15 for offices and equipment, in New Orleans?

16          A        That's hard to say. When I saw the \$1200  
17 check which was more logically, postage, I want to say  
18 it was like \$1200 for rent, but then another \$1,000  
19 for other facilities. But that may be conservative,  
20 because there was a press luncheon, and other  
21 expenditures intact. Most of our expenses were  
22 related to --

1 Q Would it be possible for you to give us a  
2 breakdown on the expenditures that you made in New  
3 Orleans, including whether it was paid for by CWT or  
4 FTE?

5 A We will do the best we can. I'm not sure  
6 the records are that clear, but --

7 Q What sort of activities were conducted by  
8 CWT in New Orleans?

9 A Well, much of the space was -- a lot of the  
10 space was taken by a public relations firm which was  
11 retained. And they worked with press and handled a  
12 lot of calls on press and distributed press releases,  
13 organized these meetings, distributed the newsletter  
14 and doesn't sound like much, but it was a very, very,  
15 hectic period. Oh, I know; we also were polling the  
16 delegates on the issue of conservative VP.

17 Q And when you were polling the delegates,  
18 how would you do that?

19 A Calls were made to invite them to meetings,  
20 and if they couldn't come, then they were asked, well,  
21 would you at least support a conservative VP,  
22 something along that line.

1           The people making the phone calls were  
2 generally volunteers and not very well trained. But  
3 we wanted to make these calls to give the impression  
4 that we're very well organized and doing a lot of  
5 things.

6           So the purpose of them was to get the calls  
7 made and for us to find out things which, you know,  
8 commitments that obviously would not necessarily hold  
9 water.

10           Q     Did you make any phone calls to delegates?

11           A     I made some to the delegates I knew  
12 primarily, who were already involved in CWT. Jim  
13 Summers comes to mind. A lady who is Chairman of the  
14 Economic Subcommittee, from Florida. I can't remember  
15 her name.

16           Q     And what were the substance of those  
17 conversations?

18           A     Usually meetings, setting up meetings,  
19 who's doing what, exchanging new information.

20           Q     If a delegate expressed a preference for a  
21 certain vice presidential candidate, would that be  
22 reported anywhere?

1 A Not to my knowledge.

2 Q Did the people in the office keep informal  
3 track of who was most frequently mentioned as the vice  
4 presidential nominee?

5 A No. There was no opportunity for that. It  
6 was too chaotic. And in fact, I think it would go  
7 against our interest to do such a thing because we  
8 would not want to be in a position of saying that 62  
9 percent of members the of Coalition want Joe Schmo  
10 because that would fracture the Coalition.

11 Q Did all the members of CWT go to the  
12 convention?

13 A No, I don't think so.

14 Q And why is that?

15 A I'm sure most of them didn't feel they had  
16 business. Many of them didn't feel they had business.

17 Q During the course of the Convention, how  
18 often would CWT hold meetings?

19 A As I said, probably not every day. But, as  
20 Senator Humphrey had said, we were going to hold  
21 meetings and we did. I should take that back. Some  
22 groups would be meeting every day, formerly or

1       informedly. And it necessarily would not be open to  
2       all delegates often. It would be a smaller group of  
3       leaders.

4           Q       And where were those meetings held?

5           A       At the CWT offices.

6           Q       What was the largest meeting that was ever  
7       held there?

8           A       I'd say about 400 people.

9           Q       Headquarters of CWT?

10          A       No, it was upstairs in the Petroleum Club.

11          Q       And did CWT rent the Petroleum Club for  
12       that purpose?

13          A       Let me take this back a second. I think it  
14       may have been in a conference room provided by another  
15       firm in our building -- yes, it was. It was in a  
16       conference room provided by another firm in the  
17       building.

18          Q       In New Orleans?

19          A       Yes.

20          Q       And did you pay for it?

21          A       No. It was provided -- made available to  
22       us.

1 Q Did CWT operate any sort of hospitality  
2 suite?

3 A No. We had soft drinks and coffee at the  
4 office and usually people were there quite late.

5 The biggest entertaining function was for  
6 the press at a luncheon. And I can't remember which  
7 day it was. That was at the Petroleum Club in the  
8 building.

9 Q And how many members of the press attended  
10 the luncheon?

11 A I would say about 70.

12 Q Was there a speaker?

13 A Senator Humphrey.

14 Q And what did he discuss?

15 A The activities of the Coalition.

16 Q Did he take questions from the press?

17 A Yes, he did.

18 Q Was he requested to name a certain person  
19 as acceptable?

20 A Yes, he was.

21 Q And did he?

22 A No, he didn't. He finally was goaded into

9 2 0 4 0 9 [2 2 8 2 3

5

1 saying whether or not -- again, this is my  
2 recollection. And I'm sure we can dig up somebody's  
3 tape recordings somewhere. My recollection was that  
4 he finally agreed to say whether or not certain  
5 candidates would be unacceptable; and he did.

6 Q And who were those candidates?

7 A I recall that they were Bob Dole and Al  
8 Simpson.

9 Q Was there anyone else?

10 A I don't recall.

11 Q Was there anyone who was indicated to be  
12 acceptable?

13 A I don't think so. Again, this goes  
14 directly against what we had agreed on in the past,  
15 and Humphrey apologized later because we had agreed  
16 that we were not going to get involved in naming  
17 names.

18 Q Did you have a press officer there?

19 A Senator Humphrey's, one of Senator  
20 Humphrey's press secretaries was on vacation and did  
21 come down to New Orleans.

22 Q And who was it?

1 A I can't remember his name.

2 Q Did he volunteer fulltime to CWT during  
3 this time?

4 A Basically, to help Senator Humphrey.  
5 Humphrey had other responsibilities as a delegate from  
6 New Hampshire.

7 Q Did you meet with any persons other than  
8 delegates who were not members of the press?

9 A Personally?

10 Q In your capacity as a member of CWT?

11 A I met with people involved in convention  
12 arrangements to get passes to the Convention for some  
13 of our staff. We touched base with staff concerning  
14 providing testimony to the Convention Committee.

15 Senator Humphrey testified at one point  
16 before one of the convention committees. I worked  
17 with the service providers, the real estate people,  
18 equipment rentals, and that's about it.

19 Q Did CWT conduct any activities on the floor  
20 of the Convention?

21 A The floor was restricted to delegates,  
22 alternates and a few others.

1                    Senator Humphrey and his aides were about  
2 the only people that could be on the floor that were  
3 directly associated with us.

4                    Q            And did they conduct any activities on  
5 behalf of CWT on the floor?

6                    A            I'm sure Senator Humphrey talked to people.  
7 He was certainly interviewed a number of times about  
8 his CWT activities while he was on the floor.

9                    Q            Did CWT purchase any materials to be  
10 distributed at the Convention?

11                   A            Yes. The newsletter, which I mentioned,  
12 and some lapel stickers that said, "I want a  
13 conservataive VP", with the name of the Coalition and  
14 the phone number and address.

15                   Q            Were there any other sort of paraphernalia  
16 that was purchased by CWT?

17                   A            We purchased a banner as a backdrop for  
18 Senator's Humphrey's press conference.

19                   Q            And what did the banner say?

20                   A            "Coalition For A Winning Ticket". I think  
21 that is it.

22                   Q            At this point, why don't we take 15 minutes

92040922826

1 and we will come back. We are fairly close to the  
2 end.

3 ( Short recess taken)

4 MS. REILLY: Okay, we can go back on the  
5 record.

6 BY MS. REILLY:

7 Q We just want to run over and review a few  
8 things. The mailer captioned, "Fellow Conservative"  
9 which was Exhibit Two, this short one, who were the  
10 vendors that you used for that mailing?

11 A Well, the list, that was Capstone. I think  
12 I thought it was Vigeurie because it was Vigeurie's  
13 idea to send this letter out. "Oh, yeah, this will  
14 get them". And so CMB provided the printing and  
15 Capstone did the mailing.

16 Q And Capstone, is that Ann Stone?

17 A She is a partner, but it is independent of  
18 Capstone. Ann Stone Associates is independent of  
19 Capstone Lists.

20 Q Are they associated?

21 A She is a principal of both, separate  
22 corporations.

92040922827

1 Q Regarding the other letter which was sent,  
2 the "Dear Delegate" letter, we've been provided with a  
3 check or \$1, 275 --

4 A \$55 --

5 Q \$55 -- no, \$75.

6 MR. DYE: Two checks, one for \$55 and one  
7 for \$75.

8 THE WITNESS: I'm sorry.

9 BY MS. REILLY:

10 Q It's item 21 at the end.

11 We're requesting all documents, invoices  
12 relating to that particular mailing as well.

13 A Can you read what that last word is? I  
14 can't see it.

15 MR. DYE: "International".

16 BY MS. REILLY:

17 Q Was there ever any agreement between  
18 Coalition For Winning Ticket, and Free The Eagle,  
19 regarding the repayment of CWT for funds or goods and  
20 services that were paid for by Free The Eagle?

21 A Not -- I don't think there was a written  
22 agreement. It was an understanding.

1 Q And the understanding was that they would  
2 be repaid within what period of time?

3 A I don't think there was a specific period  
4 of time. The way I discussed this was this: That we  
5 will be glad to take it on as a project for us, but  
6 Free The Eagle does not have the money to pay for  
7 these activities, and we have to raise funds to pay  
8 for these activities. And that was agreed to, and by  
9 and large, that is what happened.

10 Q As a rule, how much time would go by  
11 between when Free The Eagle would pay for something  
12 and was reimbursed by CWT?

13 A I think it is fair to say that within four  
14 weeks, four or five weeks, everything was reimbursed  
15 because immediately after the Convention, we sat down  
16 and looked at our expenses and pledged -- certain  
17 pledges had been received. As I recall, the funds had  
18 not come in. And so we just got to working to make  
19 sure we got those funds raised and reimbursements  
20 made.

21 Q Now, during the time when Free The Eagle  
22 was making expenditures on behalf of Free The Eagle,

1 how did you monitor what was Free The Eagle's as  
2 opposed to CWT's?

3 A I'm not -- I don't know where the problem  
4 arose. There were certain things, certainly, that Free  
5 The Eagle would not be involved in if it were not, you  
6 know, and those would be obviously expenditures of CWT  
7 to be reimbursed.

8 There were certain expenditures such as hotel  
9 bills which would have been incurred by Free The Eagle  
10 whether or not I was involved in CWT, and those were  
11 Free The Eagle expenses. So there was not a lot of  
12 gray area there.

13 Q Was there a system set up to separate them?

14 A No, just a matter of, you know, my judgment  
15 and if there were any significant expenditures, I  
16 would touch base with Senator Humphrey or other people  
17 in the executive leadership group.

18 Q And in terms of funds that were repaid, has  
19 CWT as of this date, repaid all advances that were  
20 made on behalf of Free The Eagle?

21 A All advances, yes. I'm not positive that  
22 CWT has paid for all services as yet.

92040922830

1 Q And what services would be outstanding?

2 A Well, what comes to mind is perhaps  
3 accounting services, and some staff services in  
4 conjunction with preparing FTE inquiries.

5 Q Is there an accounting that would be taking  
6 place to determine who is owed?

7 A Oh, yes. The staffer I have had, keep the  
8 boxes of CWT material and the bank account, is also  
9 instructed to keep track of hours he spends on this.

10 Q Now, in terms of reimbursing people who  
11 provided certain services for CWT, like the  
12 accountant --

13 A It's not people. It would be reimbursing  
14 Free The Eagle for services of its employees.

15 Q And what method of allocation is used to  
16 determine how much is owed?

17 A Paul is told to keep a log of his time. In  
18 other words, if he spends three hours on CWT stuff, he  
19 should make a note of that, and we then make sure that  
20 if CWT had funds, that they reimburse for those  
21 services.

22 Q So it would be on, for example, an hourly

1 basis?

2 A Yes. It is the same kind of thing we would  
3 do, if, in fact we obtained financing for a lobbying  
4 project.

5 In setting up a project, we figure out how  
6 much clerical time we estimate and tell staff to keep  
7 track of these things so that the people who finance  
8 these projects can know what they are paying for and  
9 what they are getting.

10 Q After the Convention, was there a formal  
11 reconciliation of the two accounts between Free The  
12 Eagle, and Coalition For A Winning Ticket?

13 A We provided Senator Humphrey with a  
14 comprehensive report and any -- I don't know if others  
15 requested it, but we certainly told any other  
16 contributors if they wanted a copy of our accounting,  
17 we would give it to them.

18 Q And would you be willing to provide that to  
19 the Commission?

20 A Sure.

21 Q In terms of checks, the authority to write  
22 checks, you testified that there were two signatures

92040922832

7  
1 on each check, and the ones we saw had your signature  
2 on it and Dan Perrin's?

3 A That's right.

4 Q Did Senator Humphrey also have the  
5 authority to sign checks?

6 A I don't think so.

7 Q Did he sign any checks?

8 A I don't think so.

9 Q Did he authorize payments that were paid by  
10 check?

11 A I guess a better way of saying that, you  
12 know, did he say, we got to pay this bill; yes.

13 What comes to mind is the public relations  
14 firm that we retained. Senator Humphrey was concerned  
15 that they get their funds, and you know, so we moved  
16 them up the list of priorities, and so they got their  
17 funds before some other people.

18 Q Did Senator Humphrey okay purchases prior  
19 to when they were made?

20 A He didn't get involved in day-to-day  
21 issues. You know, I decided that we needed two  
22 television sets instead of one, and I decided how many

1 phone lines we needed, et cetera, et cetera. Humphrey  
2 didn't care.

3 Q Did he ever disapprove payment of a bill?

4 A No. He gripped about expenses, which was  
5 appropriate.

6 Q In terms of the public relations firm that  
7 was hired, what was their name?

8 A I can't remember. Kate Welch Oburn, was  
9 one of the people involved there, and she was the one  
10 that I've known for some time. She and her partner and  
11 assistant were in New Orleans.

12 Q And what sort of services did they provide?

13 A Press relations.

14 Q Anything else?

15 A They helped draft statements, but that was  
16 about it.

17 Q Did they provide any services for Free The  
18 Eagle?

19 A No.

20 Q How much time did Senator Humphrey spend at  
21 CWT headquarters while he was in New Orleans?

22 A I would say one to two hours a day.

9 2 0 4 0 9 2 2 8 3 4

1 Q And that would be everyday that he was  
2 there?

3 A Yes.

4 Q And during that time that he was there, he  
5 would be telephoning delegates, is that correct?

6 A He would be going of our activities. He  
7 would be on the phone to the press. I would say no  
8 more than 15 percent of the time that he spent in  
9 headquarters, was maybe making calls to solicit  
10 delegates.

11 Q With the exception of services that Free  
12 The Eagle paid for on behalf of CWT, all the expenses  
13 that CWT paid for itself, did it all come out of the  
14 bank account that was established?

15 A In other words, did anybody else make  
16 advances?

17 Q True.

18 A I don't think so. I think it all --

19 Q Was that the only bank account maintained  
20 by CWT?

21 A Yes.

22 Q Did anybody else submit a claim for

1 reimbursement from CWT?

2 A Yes.

3 Q And who was that?

4 A Senator Humphrey had some expenses, and Dan  
5 Perrin had some expenses. I think I may have, I'm not  
6 sure.

7 Q Were they repaid?

8 A Yes. As I said, I think all of these  
9 things have been paid with the possible exception of  
10 the more recent accounting services.

11 Q You testified that CWT obtained a large  
12 room in the building that it was in to host a meeting  
13 of delegates, that it was provided for by a firm in  
14 that building?

15 A Right.

16 Q What is the name of that firm?

17 A I can't tell you. One of our staffers got  
18 to know a lady with a law firm there, and I'm under  
19 the impression it was her law firm's conference room.

20 Q You testified that Coalition For A Winning  
21 Ticker was interested in promoting the nomination of a  
22 conservative Vice President.

1                   During the course of Coalition For A  
2 Winning Ticket activities, was there any discussion of  
3 the nomination of George Bush?

4           A        It was taken for granted.

5           Q        Were the persons in the Coalition For  
6 Winning Ticket, in favor of the Bush candidacy?

7           A        Initially?

8           Q        After July the 25th, when it was formed?

9           A        That was fait accompli.

10          Q        Were they opposed to George Bush?

11          A        Again, it's like being opposed to summer  
12 weather.

13          Q        Which is really objectional.

14          Q        Is it fair to say that one of the goals for  
15 Coalition For Winning Ticket, was to strengthen the  
16 Republican Ticket and --

17          A        I think that is going too far. I think  
18 that the people involved were very committed to  
19 certain issues. And not only was it a question of  
20 making it successful, achieving the election of a  
21 President who would advocate those issues, but it  
22 would also be involved in anyone who could be

1 supportive at all.

2 Q Was there anyone at the Coalition  
3 supporting the candidacy of Michael Dukakis?

4 A Not to my knowledge. The premise was  
5 again, there was every possibility that unless the  
6 principles that CWT advocated were embodied in the  
7 candidacy, in this case, the Vice Presidency, that  
8 there would be no conservative elected, you know, as  
9 Humphrey had said, that Dukakis --

10 Q Were there concerns of CWT embodied in the  
11 Democratic Ticket?

12 A No.

13 Q So if CWT were to promote the issue which  
14 it found to be important, it would have to promote  
15 them in the Republican Party, is that correct?

16 A I guess what I'm getting at, is that if, in  
17 fact, the Republicans did not nominate someone who  
18 held those issues, many people in the Coalition would  
19 not support any of the major party issue candidates.  
20 That it -- and I'm trying to remember who, but  
21 somebody said, if, in fact we don't get a conservative  
22 Vice President, you know, this would be a great Fall

1 to take a long vacation.

2 Q I'm going to ask you if you would please,  
3 to return to Exhibit One on page six, and to please  
4 review the third paragraph of this document.

5 A Typo.

6 Q What sort of parliamentary maneuvers were  
7 CWT considering?

8 A I think that these things included, for  
9 example, a rule that opened the Convention -- would  
10 make it easier for more than one vice presidential  
11 nominee to be considered.

12 Senator Humphrey spoke, as I mentioned, he  
13 testified before one of the committees before the  
14 Convention itself convened, and I think it was on this  
15 kind of issue that he spoke. He was saying that  
16 unless there would be rule changes, or something like  
17 this, that conservatives would feel that they were  
18 shut out. And it was rather -- I can't recall it  
19 right now, but we probably have a copy of his  
20 testimony on that issue.

21 Q Would it be possible for you to furnish  
22 that to us?

1 A Sure.

2 Q Thank you.

3 A As I mentioned earlier, it had been  
4 discussed that conservatives might quote "walk out" if  
5 they were not pleased with the direction. And as I  
6 said, before, I don't think we had a serious claim on  
7 any kind of action like that. But it was important to  
8 put forth the image that we had more leverage in  
9 hoping that we could exercise them.

10 Q In the New Orleans office, were floor  
11 maneuvers discussed?

12 A Yes, along these same lines. In other  
13 words, did we have enough power or leverage to  
14 actually do something? It was discussed what Senator  
15 Humphrey personally should do, if given the floor, and  
16 given speaking time, as I recall.

17 Q In terms of encouraging the nomination of  
18 alternative vice presidential candidates noted at the  
19 end of that sentence, who were the alternative vice  
20 presidential candidates that were deemed acceptable?

21 A We didn't.

22 Q Not one single person?

920409 [Σ] 2840

1           A       Oh, yes, you can play AP reporter and do  
2       the same question. And I would come back and say,  
3       here is our press release and we want somebody who is  
4       right on these issues. The -- as I mentioned, the  
5       threat to nominate someone else besides the Bush pick  
6       was an empty threat. But it was important to say, to  
7       put forth that possibility in hopes of having some  
8       affect on the decision.

9           Q       And the second to the last line of this  
10      release, "we want George Bush to win", was that the  
11      consensus of the Coalition?. Did they want him to  
12      lose?

13          A       No. One of the debates within the group  
14      was, are we spoilers? Is this an organization that  
15      will be -- that will hurt the candidate? And there  
16      were accusations that our activities were hurting  
17      George Bush. And some people accused us of that. And  
18      that is the reason to try to neutralize that  
19      accusation. The '88 Convention was extremely  
20      organized, detailed.

21                   CWT was one of the the few dissident voices  
22      to the orchestration, the smooth orchestration of the

1 two weeks. And we made some people very upset. And  
2 that's why I think Senator Humphrey wanted to claim  
3 that he was not a spoil sport.

4 Q Okay, at this juncture, we have a couple of  
5 more document requests. These are the solicitations  
6 made to persons to join CWT prior to July 25th,  
7 1985 -- 88, I'm sorry. And what we will do is give  
8 you a written list of these, too.

9 A Those were the things that Dan would have  
10 sent out, obviously, which I got.

11 Q All the press releases that CWT released  
12 both in D.C. and New Orleans.

13 A We'll do our best on this. I've got boxes  
14 of stuff and I'll go through them, but I'm not sure I  
15 can give you everything. I'll give you everything we  
16 have.

17 Q All copies of checks that Free The Eagle  
18 wrote on behalf of CWT.

19 A In other words, you want the Free The Eagle  
20 checks.

21 Q Right?

22 Q Oh, the news release of CWT regarding the

92040922842

1 Quayle nomination.

2 Q Are there any other documents relating to  
3 CWT's activities which we haven't discussed or  
4 identified today?

5 A You know there are those five boxes. I  
6 don't know what you want, though.

7 Q What sort of things would be about in the  
8 five boxes?

9 A Correspondence, you know, when somebody  
10 said, why are you trying to hurt George Bush? Not  
11 much of that. Things like our record with the PR  
12 firm, coffee machine people, receipts of expenses.  
13 There weren't ever to my knowledge, there weren't any  
14 documents of any things like, you know, I'll give you  
15 money if you do this, or something like that, any side  
16 business or anything like that. You will see the bank  
17 statements and stuff like that, you will see what came  
18 in and what went out.

19 Q Mr. Segermark, have you given full and  
20 complete answers here today?

21 A To the best of my ability.

22 Q Is there any statement you wish to clarify?

920409 [22843

1           A       I think I should point out that the one  
2           time that a press release from CWT mentioned a  
3           candidate, was after Vice President Bush named Dan  
4           Quayle, even though he was not firmly nominated for  
5           two days. That it was a fati accompli and that it was  
6           no longer -- our activities were no longer aimed at  
7           trying to influence the Vice President to name a  
8           conservative. In effect, that was our door closing  
9           comment.

10           Q       After Quayle was --

11           A       Named by Bush.

12           Q       Did CWT provide, conduct any other  
13           activities in support of Quayle?

14           A       No.

15           Q       Did CWT conduct any other activity?

16           A       No.

17           Q       So.

18           A       Closed up offices.

19           Q       Locked the door, at that point?

20           A       No, but you know, the staff, the offices  
21           were no longer active.

22           Q       There was no more lobbying of delegates at

920409 [2] 2844

1 that point?

2 A No.

3 Q No activity was conducted on behalf of  
4 Quayle?

5 A No.

6 Q Another further document request we have;  
7 if you would have a tape recordings of Senator  
8 Humphrey's press conference regarding his selection of  
9 Dan Quayle as the next Vice President.

10 Also, if you have a tape recording of the  
11 press conference of Senator Humphrey regarding his  
12 response regarding the nominations of Dole or Simpson.

13 A Yes, that was basically the only one.

14 Q And you do have a copy of that?

15 A No. Somebody may have a tape of that.

16 Q Do you know who would?

17 A We didn't even get a good list of the press  
18 people who were there.

19 Q Do you have any idea who would have these  
20 documents, if you don't?

21 MR. DYE: What documents?

22 THE WITNESS: You mean a copy of the tape?

920409 [2] 2845

1 BY MS. REILLY:

2 Q Any CWT documents that you don't have?

3 A No, I would have everything.

4 Q You would have all of them?

5 A No, but just when it comes to tapes, I'm  
6 not even sure of the the policies of media people in  
7 recording, keeping tapes of things like that. We  
8 didn't routinely tape things. I -- certainly if we  
9 have any tapes like that, we will provide them.

10 Mr. Dye, did you have any questions?

11 MR. DYE: No.

12 MS. REILLY: Okay, at this point, we're  
13 going to continue the deposition and it is concluded  
14 for today.

15 MR. DYE: Now, wait a minute. What is  
16 that?

17 MS. REILLY: Continue, meaning if I have to  
18 reopen for any sort of --

19 MR. DYE: Do you have any other questions.

20 MS. REILLY: Off the record.

21 (Discussion off record)

22 (Thereupon the deposition was concluded)

92040922846

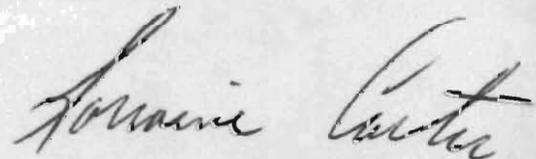
C E R T I F I C A T E

1  
2  
3 I, LORRAINE CARTER, THE OFFICER BEFORE  
4 WHOM THE FOREGOING DEPOSITION WAS TAKEN, DO HEREBY  
5 CERTIFY THAT THE WITNESS WHOSE TESTIMONY APPEARS IN  
6 THE FOREGOING DEPOSITION WAS DULY SWORN BY ME; THAT  
7 THE TESTIMONY OF SAID WITNESS WAS TAKEN BY ME IN  
8 STENOTYPE AND THEREAFTER REDUCED TO PRINT UNDER MY  
9 DIRECTION; THAT SAID DEPOSITION IS A TRUE RECORD OF  
10 THE TESTIMONY GIVEN BY SAID WITNESS; THAT I AM NEITHER  
11 COUNSEL FOR, RELATED TO, NOR EMPLOYED BY ANY OF THE  
12 PARTIES TO THE ACTION IN WHICH THIS DEPOSITION WAS  
13 TAKEN; AND, FURTHER, THAT I AM NOT A RELATIVE OR  
14 EMPLOYEE OF ANY ATTORNEY OR COUNSEL EMPLOYED BY THE  
15 PARTIES HERETO, NOR FINANCIALLY OR OTHERWISE  
16 INTERESTED IN THE OUTCOME OF THE ACTION.

17  
18 NOTARY PUBLIC IN AND FOR  
19 THE DISTRICT OF COLUMBIA

20 My Commission Expires:

21 July 15, 1994

22 

92040922847

Responses of the Coalition for a Winning Ticket  
to the Federal Election Commission's Interrogatories  
and Request for Production of Documents

1. The Coalition For A Winning Ticket was formed on July 25, 1988. As a member of the Coalition, Free the Eagle Managing Director Howard Segermark offered to provide office space and accounting services. Thus, he assumed responsibility for operating the Coalition. Some Free the Eagle staff was involved in the Coalition, and it can be said that it was a project of Free the Eagle.

The Coalition included the following organizations:

- (1) The American Conservative Union
- (2) Citizen's Coalition
- (3) Coalitions For America
- (4) College Republican National Committee
- (5) The Conservative Caucus
- (6) Conservatives of Texas
- (7) Eagle Forum
- (8) Free Market Political Action Committee
- (9) Gun Owners of America
- (10) High Frontier
- (11) The National Congressional Club
- (12) National Conservative Political Action Committee
- (13) Ruff Political Action Committee
- (14) Salt PAC
- (15) State Department Watch

92040922848

PLAINTIFFS  
EXHIBIT  
6-28-89 H.S.  
Exhibit # 1 21

- (16) National Teenage Republicans
- (17) New Hampshire Conservative Union
- (18) United Conservatives of America Political Action Committee
- (19) United Families of America
- (20) United States Defense Committee
- (21) Congressional Majority Committee
- (22) Young Americans for Freedom
- (23) Young Conservatives of Texas
- (24) Public Affairs Political Action Committee

2. The Managing Director of Free the Eagle (FTE), Mr. Howard Segermark, served as chief financial officer of the Coalition. The Treasurer of FTE, Mr. William Jacobs, shared financial responsibility for the Coalition with Mr. Segermark.

3. The total amount of receipts of the Coalition was \$36,940.00, mostly from personal appeals.

4. The total amount of disbursements was \$33,162.17.

5. Mr. Dan Perrin was principally involved in the preparation of the solicitation letter. He was assisted by Mr. Richard Viguerie.

6. Attached as exhibit A are all enclosures mailed with the letter.

7. The total number of letters mailed was 4,804.

8. The source of the mailing list was: CAPSTONE; 1315 Duke St., Alexandria, VA 22314.

92040912849

9. (a) Free the Eagle assumed the responsibility for the initial cost of the mailing and was subsequently reimbursed from funds raised.

(b) The source of funds was donations to the Coalition.

(c) The total amount of funds spent on the mailing was \$3,666.68.

(d) No written records were kept of receipts from the mailing. Mr. Perrin stated that the mailing brought in \$300-400. Mr. Segermark independently confirmed that the mailing brought in a negligible amount of contributions. Both stated that the mailing actually cost the Coalition money.

10. All responsive documents are enclosed as exhibit B.

11. There were two other mailings.

(a) The first was a mailing to delegates attending the Republican Convention. A copy of the letter is included as exhibit C.

(b) The total number of letters mailed was 4,946.

(c) The cost of the mailing was \$1,591.20.

(d) No funds were raised as a result of the mailing.

Approximately ten letters were sent by Senator Humphrey thanking financial contributors for their gifts. The only cost was for paper and postage which was provided by Free the Eagle. The Coalition received no contributions from these letters.

06C 2116

LAW OFFICES  
WEBSTER, CHAMBERLAIN & BEAN  
1747 PENNSYLVANIA AVENUE, N. W.  
WASHINGTON, D. C. 20006

GEORGE D. WEBSTER  
J. COLEMAN BEAN  
ARTHUR L. HEROLD  
ALAN P. DYE  
BURRETT VAN KIRK  
C. MICHAEL DEESE  
FRANK M. NORTHAM  
GERARD P. PANARO  
JOHN W. HAZARD, JR.  
CHARLES M. WATRINS  
ROBERT M. SRELTON  
HUGH K. WEBSTER  
ANNE S. POPE

(202) 785-9500  
FAX: (202) 835-0243

OF COUNSEL  
CHARLES E. CHAMBERLAIN  
CONSULTANT  
A. L. SINGLETON

March 8, 1989

BY HAND

Patty Reilly, Esquire  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: MUR 2810  
Coalition for a Winning Ticket

Dear Ms. Reilly:

Enclosed are the exhibits to CWT's responses to the FEC's interrogatories and request for production of documents. I apologize for the inadvertant failure to include them with CWT's responses.

Very truly yours,

*Alan P. Dye*

Alan P. Dye

Enclosure

4

92040912851

COPIES 13:53

**COALITION FOR A WINNING TICKET**

**GORDON HUMPHREY, U.S. SENATE**  
Chairman

**Press Release**

**STATEMENT OF SENATOR GORDON J. HUMPHREY**  
**CHAIRMAN, COALITION FOR A WINNING TICKET**  
**AUGUST 4, 1988**

Today, 25 member organizations and 48 conservative leaders, representing thousands of conservative activists nationwide, announce their banding together to stave off an impending disaster for the Republican party in November.

The membership of the Coalition for a Winning Ticket believe it is imperative that Vice President Bush choose a running mate who will be complementary rather than merely compatible. We believe George Bush should choose someone who will bring strength among groups where the ticket is now weak.

We believe it is imperative that George Bush choose a running mate who will bring strength to our ticket by sending a message to the conservative majority within the Republican Party that they are wanted, that they are needed, and that they will have a place in a Bush administration.

We believe George Bush must send a message to conservative Americans, Republican, Democratic and Independent alike. He must choose a running mate with whom Middle America can identify. The problem of the Bush campaign is that it is attracted to establishment blue-bloods. What the Bush ticket needs is a transfusion of red corpuscles from the conservative wing of our party. If George Bush selects an establishment Republican as his running mate, we believe we are headed for a disaster in November. If he selects a Reagan conservative, we can win.

We believe George Bush can win if he reassembles the majority coalition of 1980 and 1984, which consists of Reagan Democrats and Independents, and the bulk of the Republican Party. But George Bush can reassemble that coalition only if he chooses a conservative running mate.

George Bush cannot win by trying to out-Democrat the Democrats, or by trying to out-Dukakis Michael Dukakis. He cannot win by offering Republican versions of Democrat programs. He cannot win by talking about being the "education President" or by pandering to the special interest groups whose members are going to vote for Dukakis no matter what.

**Profile of Acceptable Conservative Candidates**

We believe George Bush should choose someone who is 1) committed to a vigorous foreign policy based on peace through strength and dedicated to rolling back the frontiers of communism; 2) who recognizes that the Soviet Union continues to seriously threaten the West, notwithstanding the public relations skills of Mikhail Gorbachev; 3) who supports a publicly-avowed commitment to early deployment of the SDI Space Shield unencumbered by the ABM Treaty; 4) who supports military aid to the freedom fighters in Nicaragua, Afghanistan, Cambodia, Angola and Mozambique; 5) who recognizes the vital strategic importance of an anti-communist southern Africa.

We believe George Bush must choose someone committed to a domestic agenda which includes: 1) unequivocal support for the right-to-life plank of the Republican platform; 2) a presidential veto of all appropriations bills which fund abortion, except in life-threatening cases; 3) unequivocal opposition to tax increases; 4) line item veto authority; 5) breaking the monopoly in the education of our children; 6) enterprise zones; 7) measures to give public housing tenants a stake in the future.

The Bush campaign so far has turned off conservatives for example by the selection of an keynote speaker who disagrees with President Reagan and most conservatives on several cardinal issues. The selection as co-advisor on education matters of Terrell Bell, a notorious Reagan-basher, is the latest bitter disappointment.

The Coalition for a Winning Ticket has secured office space in Washington and in New Orleans. We are working actively to unite conservatives in our plea to George Bush. We will be active outside the convention hall, speaking with the press, and we are considering parliamentary maneuvers within the convention up to and including encouraging the nomination of an alternative vice-presidential candidate.

Conservatives have worked too long and too hard to let the Republican Party be taken over by its minority, establishment wing. We will not be disenfranchised. We want George Bush to win. But he must help us, too.

SEN. HUMPHREY (at the GOP  
Convention in New Orleans):  
Tell the other delegates and tell  
George Bush here's where I stand!

Senator Gordon Humphrey  
COALITION FOR A WINNING TICKET  
1100 Poydras Street  
Suite 1205  
New Orleans, LA 70167

Place 35¢  
postage  
here

Dear Senator Humphrey:

I'm glad to learn that you've formed a Coalition to urge Mr. Bush to select a Conservative  
for Vice President to campaign this fall on a solid conservative platform.

\_\_\_\_\_ You may include my name when you release to the press the updated names of the  
members of your Coalition For A Winning Ticket.

\_\_\_\_\_ Please do not include my name when you release to the press the updated names of the  
members of your Coalition For A Winning Ticket, even though I support  
your efforts.

Enclosed is my maximum donation in the amount            below:

\$250    \$500    \$750    \$1,000    Other amount \$ \_\_\_\_\_

\_\_\_\_\_  
(Signature)

Contributions to Coalition For A Winning Ticket are **NOT** deductible as charitable  
contributions for Federal Income Tax purposes.

4 5 8 2 6 0 4 0 2 6

7

Cost Breakdown of Coalition For A Winning Ticket.  
"Exhibit A" Mailing

CMB INTERNATIONAL	Envelopes	\$ 613.80
	Letter	175.00
	Press Release	450.00
	Reply Form	87.50
	Cut Charge	30.00
	Inserting	400.00
	Sales Tax	<u>105.38</u>
		1861.68
CAPSTONE	Mailing List	550.00
CMB INTERNATIONAL	Postage	<u>1255.00</u>
		1805.00
		1861.68
		<u>1805.00</u>
	Total	3666.68

9 2 0 4 0 9 2 2 8 5 5



9 2 0 4 0 9 2 2 8 5 7

*Paul Andrew  
Harrison*

0003 34031

AMERICAN AIR MAIL  
FIRST CLASS  
WASHINGTON DC  
20540  
154 154

AUG - 9 1931

AG: 09  
RECEIVED

U.S. AIR MAIL

92040922858

11

PAY TO THE ORDER OF Capstone Five One 1082 1/4

one hundred and twenty-five 00 125.00

DOLLARS

FOR Washin **1st AMERICAN** THE AMERICAN BANK IN WASHINGTON DC

3456 1634 0000012500

Al Segent

92040922859

FOR DEPOSIT ONLY  
CAPSTONE LISTS, INC.  
ACCT. #2001365

0479 23130



AG 11 03

AG 12



150256240

AG 08 11 11  
AND JAY'S BANK  
CAPSTONE LISTS, INC.  
BALTIMORE, MD

150256240

12

92040922860

PAY TO THE ORDER OF

*Capstone*

*Two Hundred and Twenty-five* DOLLARS

*Aug 8* 1984

*1852* 540

*1825.00*

1ST AMERICAN BANK

FOR DEPOSIT ONLY

*Frank Mc*

⑆051000043⑆

3 456 463⑈

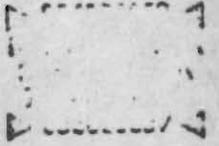
*A. Soguen*

⑆0000042500⑆

9 2 0 4 0 9 2 2 8 6 1

FOR DEPOSIT ONLY  
CAPSTONE LISTS, INC.  
ACCT. #2001365

0479 23136



AL 113

AP 12



130238261

AG 11 11

FOR ANY BANK  
SANTAL BANK, N.A.  
BALTIMORE, MD

130238261

14

15

PAY TO THE ORDER OF

*CHESTER J. HARRIS*

*W. H. HARRIS* 188 154/840

FIVE THOUSAND FIVE HUNDRED AND NINETY-FIVE DOLLARS

1ST AMERICAN BANK

FOR *Robbing & Maling*

⑆054000043⑆

⑆156463⑆

⑆0000559518⑆

92040922862

9 2 0 4 0 9 2 2 8 6 3

FOR DEPOSIT ONLY  
CMB INTERNATIONAL  
034-028-4

010007959 081  
FEDERAL RESERVE BANK  
WASHINGTON, D.C.  
AUG 15 1988  
25655559322

ANY BANK, ETC.  
INDUSTRIAL  
BANK OF  
WASH.  
WASHINGTON, D.C.  
AUG 88

25655559322

# CAPSTONE

1315 Duke Street, Suite 200  
 Alexandria, VA 22314-0996 • (703) 663-4131

*Rec'd*  
 8/19/88

## INVOICE

INVOICE NO. 32312

DATE 08/02/88

**SOLD TO:**

COMMITTEE FOR A WINNING TICKET  
 25 E STREET, N.W. 8th FLOOR  
 WASHINGTON, D.C. 20001  
 ATTN: HOWARD BERGERMARK

**SHIPPED TO:**

BERGERMARK COMPANY  
 25 E STREET, N.W. 8th FLOOR  
 WASHINGTON, D.C. 20001  
 ATTN: HOWARD BERGERMARK

QUANTITY	DESCRIPTION	PRICE	AMOUNT
7507	BEST WAY		
5,000	BLACK TIE REPUBLICAN DONORS Shipping/Handling DO NOT DUPLICATE	\$ 80.00/H	\$ 400.00
			\$ 25.00
	<b>TOTAL DUE</b>		<b>\$ 425.00</b>

Reference :  
 Mail date : 08/08/88  
 Offer : HIGH \$\$

Part due invoices are subject to 1% interest per month.

4 9 8 2 2 6 0 4 0 2 6

71

August 1, 1988

Dear Delegate:

Please, if you believe it's essential (as I certainly do) for George Bush to choose a conservative running mate, take the time to read the enclosed press release which I issued on July 27th, during a news conference in the Senate Press Gallery.

In less than two weeks the Republican Convention begins in New Orleans. More than ever grassroots conservatives need to take the lead in assuring that we have a winning ticket and a winning platform. That is why I have formed the "Coalition For A Winning Ticket."

I very much need the support of you and other conservative leaders to lend your name to this important undertaking. We need to communicate to the Vice President, his top aides and the public, that conservatives do not feel adequately represented in the Convention, in the campaign and on the ticket. The Coalition For A Winning Ticket has planned daily and separate meetings for delegates and non delegate leaders, press conferences, and Convention floor activities.

There is a cause worth fighting for! There are issues worth fighting for! Right to Life! Aid to the Contras and other freedom fighters! Right to keep and bear arms! Balanced Budget Amendment! Line Item Veto! Deployment of SDI! No Tax Hike! Defunding the Left! And on and on!

If you agree with me, please let me know where you will be staying so that I can get in touch with you in New Orleans by returning the enclosed reply form today.

I will be holding a press conference soon and if you get your reply back to me quickly I will include your name as a member of our coalition. I will be in touch with you before the convention with a list of conservative leaders that have joined the "Coalition for A Winning Ticket."

Best Regards,

Gordon Humphrey

92040922865

United States Senator

Dear Senator Humphrey, I am pleased to learn that you are forming a Coalition to urge George Bush to select a conservative for a Vice President to campaign this fall on a solid conservative platform.

You may include my name when you release to the press the names of the members of your Coalition For A Winning Ticket.

Address at the Convention \_\_\_\_\_.

\_\_\_\_\_.

Phone: \_\_\_\_\_.

Signature \_\_\_\_\_.

I would also like to give my financial support. Enclosed is my optional \$100.00 membership fee. Other \_\_\_\_\_.

If you have any questions, please write: Dan Perrin, Executive Director, The Coalition For A Winning Ticket, 25 E Street N.W. 8th Floor, Washington, D.C. 20001 or call (202) 638-0080.

92040922866

9 2 0 4 0 9 2 2 8 6



PAID  
AUG 1 '88

PAID  
AUG 1 '88

# 42542

check

AS

12191610

1 7

August 1 19 88 <sup>154</sup>/<sub>540</sub>

PAY TO THE ORDER OF 1st American \$ 1275.00

one thousand, two hundred and seventy-five DOLLARS

FOR Cashier's Check by CMB Federal [Signature]

1ST AMERICAN  
FIRST AMERICAN NATIONAL BANK, MEMPHIS, TN

⑆054000043⑆ 3 456 463⑆ ⑆0000127500⑆

21

9 2 0 4 0 9 2 8 6 8

# COALITION FOR A WINNING TICKET

GORDON HUMPHREY, U.S. SENATE  
Chairman

Dear Fellow Conservative:

I'll be blunt.

I'm asking you to give at least \$250 to as important a project as we conservatives will undertake in this election year.

And that project is to convince George Bush to pick a conservative as his running mate if we are to defeat liberal Michael Dukakis.

Take a second to read the press release I issued at a news conference in the Senate Press Gallery. More than ever grassroots conservatives need to take the lead in assuring that we have a winning ticket and a winning platform. That's why I formed the "Coalition For A Winning Ticket."

As you read this the Republican Convention is ready to convene in New Orleans and I will need your support and that of others to make this project a success.

We are planning daily strategy meetings with delegates and other non-delegate leaders in New Orleans. We will hold press briefings on our efforts to have as much input as possible until Mr. Bush makes his selection on the final day of the convention.

So we don't have much time. Time is so short, in fact, that I'm asking you to send your donation directly to me in New Orleans instead of Washington. That way I'll have an up-to-the-minute list to release to the press of members of the Coalition.

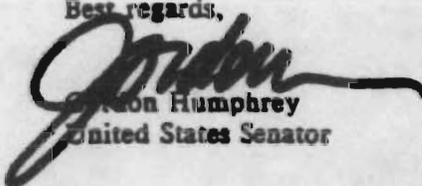
Believe me, this is a cause worth fighting for! And there are issues worth fighting for! A Strong National Defense! Balanced Budget Amendment! Right to Life! No Tax Hike! Right to Keep and Bear Arms! Aid to the Contras and other Freedom Fighters! Line Item Veto! Deployment of SDI! Defunding the Left! The list goes on and on!

In all my years in the U.S. Senate I've lead many fights on issues important to our conservative principles and to our country. But this one is as important, if not more so, than any of them so please don't let me down.

We're already committed to a budget of \$50,000 so please send me your \$250, your \$500, even your \$750 or \$1,000 payable to Coalition For A Winning Ticket to my personal attention in New Orleans.

Time is so valuable and this project so important, if you have any questions, call me in New Orleans at (504) 528-2252, or my Executive Director, Dan Perrin at the same number.

Best regards,

  
Gordon Humphrey  
United States Senator

PLAINTIFF'S  
EXHIBIT

EXHIBIT #2 MS  
6-28-89

92040922869

**COALITION FOR A WINNING TICKET**

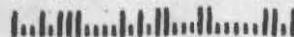
1100 Poydras Street  
Suite 1205  
New Orleans, LA 70167

AUG 12 88

CRM-2107



The Hon. John C. Keeney  
Dep. Asst. Atty. General, Cd  
Dept. of Justice  
10th & Const. Ave. N.W.  
Washington DC 20530



9 2 0 4 0 9 2 2 8 7 0



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2810

DATE FILMED 8/28/92 CAMERA NO. 4

CAMERAMAN SES

92040922871



FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20463

Microfilm  
 Public Records  
 Press

THE FOLLOWING DOCUMENTATION IS ADDED TO  
THE PUBLIC RECORD IN CLOSED MUR 2810.

9/29/92

92040924088

LAW OFFICES  
**WEBSTER, CHAMBERLAIN & BEAN**

1747 PENNSYLVANIA AVENUE, N.W.

WASHINGTON, D.C. 20006

(202) 785-9500

FAX: (202) 835-0243

GEORGE D. WEBSTER  
J. COLEMAN BEAN  
ARTHUR L. HEROLD  
ALAN P. DYE  
EDWARD D. COLEMAN  
BURKETT VAN KIRK  
FRANK M. NORTHAM  
GERARD P. PANARO  
JOHN W. MAZARD, JR.  
CHARLES M. WATKINS  
HUGH K. WEBSTER  
ANNE B. POPE  
DAVID P. GOCH

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
SEP 24 AM 10:48  
OF COUNSEL  
CHARLES E. CHAMBERLAIN

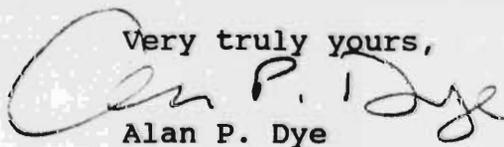
September 23, 1992

Jose Rodriguez, Esquire  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Dear Mr. Rodriguez:

I have been asked to transmit to you the attached checks. The check in the amount of \$500.00 is the remaining amount due in the civil penalty totalling \$3,500.00 called for in the Conciliation Agreement executed between the Federal Election Commission and CWT on July 28, 1992. The other check, in the amount of \$2,500.00, represents the entire penalty payable by Free the Eagle in the Conciliation Agreement executed by the Federal Election Commission on July 28, 1992 in connection with MUR 2810. I believe that this closes the matter. If you have any additional questions please address them to Kim Pearson.

Very truly yours,



Alan P. Dye

Enclosures

APD/ddb

cc: Mr. Kim Pearson

92040924089

Folder Copy



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

September 24, 1992

TWO WAY MEMORANDUM

TO: Virginia Whitted  
OGC, Docket

FROM: Philomena Brooks  
Accounting Technician

SUBJECT: Account Determination for Funds Received

We recently received a check from Webster, Chamberlain & Bean, check number 22846, dated September 23, 1992, and in the amount of \$ 2,500.00. Attached is a copy of the check and any correspondence that was forwarded. Please indicate below the account into which it should be deposited, and the MUR number and name.

-----

TO: Philomena Brooks  
Accounting Technician

FROM: Virginia Whitted  
OGC, Docket

In reference to the above check in the amount of \$ 2,500.00, the MUR number is 2810 and in the name of Free the Eagle. The account into which it should be deposited is indicated below:

- Budget Clearing Account (OGC), 95F3875.16
- Civil Penalties Account, 95-1099.160
- Other: \_\_\_\_\_

Philomena Brooks  
Signature

09/24/92  
Date

92040924090

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE

92 SEP 24 AM 10:48

22846

**WEBSTER, CHAMBERLAIN & BEAN**  
PH. 202-785-9500  
1747 PENNSYLVANIA AVE., N.W.  
WASHINGTON, D.C. 20006

September 23 1992

15-411  
540

PAY  
TO THE  
ORDER OF

FEDERAL ELECTION COMMISSION

\$ 2,500.00

TWO THOUSAND FIVE HUNDRED AND no/100

DOLLARS

**FIRST AMERICAN BANK**  
FIRST AMERICAN BANK, N.A.  
WASHINGTON, DC 20005

Free the Eagle

FOR

*G D Webb*  
*Jane L. Horsley*

⑈022846⑈ ⑆054000043⑆ ⑆ 3203093⑈

Hand carry

92040924091

Folder Copy



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

September 24, 1992

92 SEP 24 AM 11:48

RECEIVED  
FEDERAL ELECTION COMMISSION

TWO WAY MEMORANDUM

TO: Virginia Whitted  
OGC, Docket

FROM: Philomena Brooks  
Accounting Technician

SUBJECT: Account Determination for Funds Received

We recently received a check from Webster, Chamberlain & Bean, check number 22845, dated September 23, 1992, and in the amount of \$ 500.00. Attached is a copy of the check and any correspondence that was forwarded. Please indicate below the account into which it should be deposited, and the MUR number and name.

-----

TO: Philomena Brooks  
Accounting Technician

FROM: Virginia Whitted  
OGC, Docket

In reference to the above check in the amount of \$ 500.00, the MUR number is 2810 and in the name of Coalition for A Winning Ticket. The account into which it should be deposited is indicated below:

- Budget Clearing Account (OGC), 95F3875.16
- Civil Penalties Account, 95-1099.160
- Other: \_\_\_\_\_

Virginia Whitted 09/24/92  
Signature Date

92040924092

OGC 6595

RECEIVED  
FEDERAL ELECTION COMMISSION  
92 SEP 24 AM 10:48

92040924093

22845

**WEBSTER, CHAMBERLAIN & BEAN**

PH. 202-785-9500  
1747 PENNSYLVANIA AVE., N.W.  
WASHINGTON, D.C. 20006

September 23 19 92

15-11  
540

PAY  
TO THE  
ORDER OF

FEDERAL ELECTION COMMISSION

\$ 500.00

FIVE HUNDRED AND No/100

DOLLARS

**FIRST AMERICAN BANK**  
FIRST AMERICAN BANK, N.A.  
WASHINGTON, DC 20005

FOR

CWT

*[Handwritten Signature: R D White]*  
*[Handwritten Signature: Jane L. Horsley]*

⑈022845⑈ ⑆054000043⑆ ⑈

⑈3203093⑈

Hand Delivered