



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3147

DATE FILMED 8/22/91 CAMERA NO. 4

CAMERAMAN AS

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10-16-90

Federal Election Counsel
Washington, DC
20463

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 OCT 25 PM 12:27

MUR 3147

re:FEC violation complaint

To Whom It May Concern;

On October 11, 1990, my husband recieved a letter & pledge/contribution request (copies enclosed), from Senator Bob Dole. Although we recieve many requests like this one, we have never seen the FE used to obtain information that is not a requirement by law.

I know that contributors to any campaign or political PAC has to give their name & address when they contribute, unless they donate cash when the hat is passed; but the request for more information than the law requires, seems to be a clear violation and misuse of the law to obtain that additional information.

As you can see, the letter is sent in behalf of the National Republican Senatorial Committee, by Senator Bob Dole, for Senator Alan Simpson/Senator Mark Hatfield/Senator Ted Stevens/Lt. Governor Al Kolstad/Congressman Larry Craig/Congresswoman Pat Saiki/Senator Larry Pressler. It would appear that the personal information requested (using the law as a ruse), could be valuable for other intended uses however, under most circumstances people do not want to disclose anymore information than necessary; unless they are directed to do so according to the law!

I would appreciate your prompt action regarding this violation.

Linda Burkhart
1192 Mile High Dr.
Casper, Wy 82604
(307)234-4754

Linda Burkhart

State of Wyoming
County of Natrona

Subscribed and sworn to me this 17th day
of October, 1990, by Linda Burkhart
Witness my hand and official seal.
My commission expires: 1-16-93

Deborah Nifogen
DEBORAH NIFOGEN Notary Public
State of Wyoming Natrona
My Commission Expires Jan. 16, 1993

91040360050

cc: Margy White, Wyo. Secretary of State office

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

Send the Free
Vote Envelope today!

VOTE AMERICA...VOTE REPUBLICAN

our Republican Friend:

The whole world is doing it. Now it's
OUR turn to answer freedom's call.

Especially the freedom to vote.

As new millions finally begin
celebrating this cherished freedom
worldwide, it's tremendously important
at every American join in the
celebration on November 6th.

Because YOU still have every bit as
much to win or lose as our friends in
other democracies around the world.

And just as the watershed 1980
elections charted America's decade of
revel in the 80's, the 1990 elections
will decide America's destiny for the
next decade of the 20th century.

It all depends on electing the right
team at every level. In the U.S. Senate
that team includes:

- Senator Alan Simpson
- Senator Mark Hatfield
- Senator Ted Stevens
- Lt. Governor Alan Kolstad
- Congressman Larry Craig
- Congresswoman Pat Saiki
- Senator Larry Pressler

And YOU are the key to putting them in
office!

The **VOTE AMERICA...VOTE REPUBLICAN**
project is the largest, most costly Get-
-The-Vote program we've ever tried.
It will mean the difference between
winning and losing for literally HUNDREDS
OF REPUBLICAN CANDIDATES UP AND DOWN THE
NET!!!

(over)

425 Senate Street, N.E. Washington, D.C. 20002

As soon as you rush your **I'LL VOTE
PLEDGE** back to me in the **SPECIAL POSTAGE
FREE ENVELOPE** I've enclosed, we'll enter
your **PLEDGE** in our Vote Forecast
Projection.

That way, we can concentrate our efforts
on turning out **MILLIONS OF REPUBLICANS
WHO MIGHT NOT VOTE**...instead of spending
those dollars on good people like you who
have already **PLEDGED** to go to the polls.

But **MONEY IS THE KEY**. It costs about
35 cents to mail and phone each voter.
That means we must spend \$350,000 to
reach one million voters.

**AND WE NEED TO REACH 10 MILLION MORE
VOTERS!!!**

That's why I'm asking you to help us
turn out 100 voters with a contribution
of \$35...or even \$17.50 to help us turn
out 50 voters.

Please...do it now! Return your **I'LL
VOTE PLEDGE** and add your financial
support. Then, mark your calendar and
VOTE on Tuesday, November 6th.

Remember, it's America's greatest
freedom...and the whole world is
watching!

Sincerely,

Senator Bob Dole
Republican Leader

P.S. Only 50 out of every 100 Americans
vote in most elections. Your
contribution of \$17.50 or \$35.00
can change this sad statistic.
Keep America the strongest
democracy in the world.

"I'LL VOTE PLEDGE"

President Bush
THIS IS MY PLEDGE TO VOTE on November 6th, and keep
America's greatest freedom alive!!!

I hereby pledge to help reach other American voters.
\$35.00 \$17.50 more/less

Signature
Steven E Burkhardt
1192 Mile Hi Dr
Casper, WY 82604 **35P**

Please make check payable to: National Republican Senatorial Committee
Contributions to the National Republican Senatorial
Committee are not deductible as charitable contributions for federal income tax purposes. (over, please)

Federal Election Law requires we ask the Following:
Occupation: _____
Place of Business: _____
Business Address: _____
Home Phone: _____

Frank
back



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 31, 1990

Linda Burkhart
1192 Mile High Drive
Casper, WY 82604

RE: MUR 3147

Dear Ms. Burkhart:

This letter acknowledges receipt on October 25, 1990, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by the National Republican Senatorial Committee and James L. Hagen, as treasurer. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 3147. Please refer to this number in all future correspondence. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

If you have any questions, please contact Retha Dixon, Docket Chief, at (202) 376-3110.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Procedures

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 31, 1990

James L. Hagen, Treasurer
National Republican Senatorial Committee
452 Second Street, N.E.
Washington, D.C. 20002

RE: MUR 3147

Dear Mr. Hagen:

The Federal Election Commission received a complaint which alleges that the National Republican Senatorial Committee and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3147. Please refer to this number in all future correspondence.

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

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

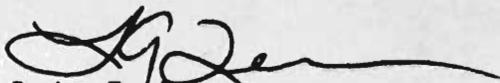
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If you have any questions, please contact Dawn Odrowski, the attorney assigned to this matter at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel

BY:


Lois G. Lerner
Associate General Counsel

Enclosures

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

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06-8620

WILEY, REIN & FIELDING

90 NOV 13 AM 10:40

1776 K STREET, N.W.
WASHINGTON, D. C. 20006
(202) 429-7000

JAN WITOLD BARAN
(202) 429-7330

November 12, 1990

FACSIMILE
(202) 429-7049
TELEX 248349 WYRNUM

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

90 NOV 13 PM 12:35

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

ATTN: Dawn Odrowski, Esq.

Re: MUR 3147 (National Republican Senatorial Committee)

Dear Mr. Noble:

This office represents the National Republican Senatorial Committee ("NRSC") and James L. Hagen, as Treasurer, in the above-captioned matter. Enclosed please find an executed Statement of Designation of Counsel. This letter is in reply to a Complaint filed by Ms. Linda Burkhart and designated Matter Under Review ("MUR") 3147. For the reasons set forth herein, the Federal Election Commission ("FEC" or "Commission") should find no reason to believe that the NRSC has violated any provision of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. §§ 431-455 ("Act").

The Complaint stems from a fundraising solicitation letter sent by the NRSC. At the outset, it is important to note that Complainant has not specifically alleged any

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WILEY, REIN & FIELDING

Lawrence M. Noble, Esq.
November 12, 1990
Page 2

violation of federal election law with respect to this NRSC mailing. Instead, it appears from the face of the Complaint that the Complainant is discomfitted by the NRSC's request for each donor's occupation, place of business, business address, and home phone number.

As the Commission is well aware, under 11 C.F.R. § 104.8, the NRSC must "disclose the identification of each individual who contributes in an amount in excess of \$200." According to this regulation, such identification shall include "the individual's name, mailing address, occupation, the name of his or her employer, if any, and the date of receipt and amount of any such contribution." Id.

A review of the NRSC letter demonstrates that it complies with this provision of the Act. The letter asks individuals who respond by donating funds to the NRSC to list their "Occupation," "Place of Business," "Business Address," and "Home Phone." While it is true that the solicitation of such information goes slightly beyond the regulatory minimum, requesting supplementary information concerning the contributor does not constitute a violation of the Act. Furthermore, in light of the statutory mandate to use "best efforts" to obtain information required by the Act, 2 U.S.C. § 432(i), the NRSC should not be faulted for seeking

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WILEY, REIN & FIELDING

Lawrence M. Noble, Esq.
November 12, 1990
Page 3

additional data from contributors as part of its record-keeping procedures. Given that the NRSC has followed the Act's requirements regarding the retrieval of donor identification information, the vague allegations in the Complaint are, therefore, without merit.

Conclusion

Accordingly, the Commission should find no reason to believe that the National Republican Senatorial Committee and James L. Hagen, as Treasurer, violated the Federal Election Campaign Act.

Sincerely,



Jan Witold Baran
Counsel for National Republican
Senatorial Committee, and
James L. Hagen, as Treasurer

cc: Mr. James L. Hagen
William B. Canfield, III, Esq.

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 3147

NAME OF COUNSEL: Jan W. Baran, Esquire

ADDRESS: Wiley, Rein & Fielding

1776 K Street, NW

Washington, D.C. 20006

TELEPHONE: (202) 429-7330

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.

11/2/90
Date

James L. Hagen
Signature

RESPONDENT'S NAME: James L. Hagen

ADDRESS: National Republican Senatorial Committee

425 2nd Street, NE

Washington, D.C. 20002

HOME PHONE: (703) 845-1028

BUSINESS PHONE: (202) 675-4291

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91 JUL 22 AM 10:57

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

MUR # 3147
DATE COMPLAINT RECEIVED
BY OGC: October 25, 1990
DATE OF NOTIFICATION TO
RESPONDENT: October 31, 1990
STAFF MEMBER: Dawn M. Odrowski

COMPLAINANT:

Linda Burkhart

RESPONDENT:

National Republican Senatorial
Committee and James L. Hagen, as
treasurer

RELEVANT STATUTES:

2 U.S.C. § 432(c)(2)
2 U.S.C. § 432(i)
2 U.S.C. § 434(b)(3)(A)
11 C.F.R. § 104.7(b)
11 C.F.R. § 104.8

INTERNAL REPORTS CHECKED: None

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

Linda Burkhart, a Wyoming resident, filed a complaint with the Commission concerning a fundraising solicitation sent to her husband by the National Republican Senatorial Committee ("NRSC"). Attachment 1. The Complainant alleges that the NRSC violated the Federal Election Campaign Act of 1971, as amended (the "Act"), by stating in the solicitation that "Federal Election Law requires we ask" for more contributor information than actually is required under the Act. The complaint does not identify the section of the Act or accompanying regulations allegedly violated. The NRSC submitted a response to the

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complaint. Attachment 2.

II. FACTUAL AND LEGAL ANALYSIS

Complainant's allegation involves a contributor return card which was enclosed with an NRSC fundraising solicitation mailed to Complainant's husband. Attachment 1 at 2. The contributor card is designed as a "pledge to vote" in the November 6, 1990 general election. The front of the card contains the preprinted mailing address of the person solicited and check-off boxes next to suggested contribution amounts of \$35 and \$17.50 and a blank line where contributors can record contributions made in differing amounts. On the back of the card under a statement that reads "Federal Election Law requires we ask the following," the NRSC has left blank spaces for the contributor to write in his or her occupation, place of business, business address and home phone number. Id.

Complainant alleges that the NRSC's request for information beyond the contributor's name and address is a violation and misuse of the Act. She suggests that the NRSC is using the Act as a "ruse" to obtain from contributors potentially valuable personal information which they ordinarily would not disclose.

The NRSC responds that its solicitation and accompanying contributor identification card merely complies with the identification requirements of 11 C.F.R. § 104.8, which requires the NRSC to disclose the contributor's name, mailing address, occupation and employer name on the reports the committee files with the Commission for each individual who contributes at least

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\$200 to it. The NRSC concedes that its solicitation goes slightly beyond the regulatory minimum, but contends that no provision of the Act is violated by asking contributors for information beyond that required to be reported. Attachment 2 at 2. The NRSC further states that it should not be penalized for asking for more information as part of its recordkeeping procedures, particularly in light of the "best efforts" requirement of 2 U.S.C. § 432(i). Attachment 2 at 2-3.

9 1 0 4 0 3 6 J 0 6 1
Initially, Complainant is incorrect when she suggests that the NRSC is only required to request the contributor's name and address. In addition to requiring NRSC to keep a record of the names and addresses of contributors, both the recordkeeping and reporting provisions of the Act and regulations also require committees to record and disclose in reports filed with the Commission the occupation and employer of each person who contributes \$200 to it or whose contributions aggregate in excess of \$200 per calendar year.¹ 2 U.S.C. §§ 431(13), 432(c)(3) and 434(b)(3)(A) and 11 C.F.R § 104.8(a) and (b). Moreover, since committees are also required to inform contributors that this information must be reported in order to satisfy the "best efforts" requirement of 2 U.S.C. § 432(i), the

1. Though the NRSC's solicitation in this case suggests contributions of less than \$50, it also contemplates the possibility that individual contributors may contribute more. Single contributions that exceed \$200 and smaller contributions that exceed the \$200 calendar year aggregate when combined with others would both trigger the Act's recording and reporting requirements. Since the NRSC cannot know in advance who will contribute or in what amounts, its solicitation of employer and occupation information, albeit premature in some cases, is not inappropriate.

requirement that committees ask for this information implicitly follows. See also 11 C.F.R. § 104.7.

The NRSC's request for and statement regarding contributors' home phone numbers raises special concerns, however. While no provision of the Act prohibits the NRSC from asking its contributors for any information not required by the Act to be maintained or disclosed, the NRSC actually misstates in this solicitation what information the Act requires by stating that federal law requires it to ask for home phone numbers. Neither the recordkeeping requirements found at 2 U.S.C. § 432(c) nor the 2 U.S.C. § 434(b)(3)(A) reporting requirements require committees or treasurers to obtain, maintain or disclose a contributor's home phone number.²

The NRSC states that it should not be faulted for its misstatement because requesting such supplementary information from the contributor assists the committee in meeting the "best efforts" requirement of 2 U.S.C. § 432(i). Attachment 2 at 2-3. That provision deems committee reports that do not contain all the requisite contributor identification information to be in compliance with the Act if the committee treasurer has shown that best efforts were used to obtain, maintain and submit information required by the Act. 2 U.S.C. § 432(i). Certainly,

2. NRSC's request for contributors' business addresses is also a request for supplementary information since the NRSC seems to already possess a mailing address of those it is soliciting as evidenced by the preprinted address on the contributor return card in Attachment 1. Unlike the request for home phone numbers, however, a supplemental address could be disclosed in NRSC's reports as a substitute for any other address the Committee has since the Act does not define "mailing address."

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having a contributor's home phone number would enable the NRSC to contact contributors to obtain information that is required to be disclosed. However, both the legislative history of the Act and the regulations promulgated by the Commission make clear that to establish "best efforts" a committee need not make repeated requests for the same information once a request is clearly made and documented.³ Consequently, seeking contributors' phone numbers at the same time it requests statutorily required information appears to be of minimal value to the NRSC in establishing "best efforts."⁴

Notwithstanding the NRSC's explanation for requesting home

3. The House committee report for Public Law 96-187 (the 1979 amendments to the Act) explains the "best efforts" requirement by stating, in pertinent part:

If the committee made an effort to obtain the [contributor identification] information in the initial solicitation and the contributor ignored the request, the Commission should not require the committee to make the same request, two, three, or four times.

H.R. Rep No. 422, 96th Cong., 1st Sess. 14, reprinted in 1979 U.S. Code Cong. & Admin. News 2860, 2874.

Thus, the Commission's regulations state that to establish "best efforts," a treasurer must have made at least one documented request for a contributor's name, address, occupation and employer which informs the contributor that the reporting of such information is required by law. 11 C.F.R. § 104.7(b).

4. If best efforts were actually an issue in this matter, NRSC's contributor card raises a problem. The "best efforts" regulation states that such an effort must consist of a clear request for a contributor's name, address, employer and occupation and that the request must inform a contributor that such information is required to be reported. 11 C.F.R. § 104.7(b) (emphasis added). In this case, NRSC's card does not inform contributors that any information it seeks is required to be reported. Rather it states that the federal law "requires we ask" for the information sought.

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phone numbers, the problem is not the request itself but the fact that it has prefaced its request with the statement that "Federal Election Law requires we ask the following." By stating that federal law requires it to request contributors' home phone numbers, the NRSC misinforms contributors about the information the Act does require committees to obtain and disclose. At a minimum, the NRSC's statement may simply confuse the public as to the information committees must collect and disclose under the Act. More importantly, the NRSC's statement that federal law requires it to seek contributors' phone numbers may have the effect of thwarting the Act's disclosure purposes by discouraging some contributors who are concerned with privacy or who do not wish to be solicited by phone from disclosing any information, including other requested information which the Act does require Committees to obtain and report. Additionally, some individuals might be discouraged from contributing at all.

Complainant appears to suggest that the NRSC may have intentionally misstated the information the Act requires because contributors' phone numbers might be valuable to it. Such information could increase the value of the NRSC's contributor lists because it gives the NRSC, and anyone to whom it sells, rents or donates the information, greater access to contributors. Whatever the NRSC's intent and the possible impact of its representation on the contributor return card, however, no provision of the Act or regulations prohibits the NRSC's representation that the Act requires it to request

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contributors' home phone numbers.⁵

Based on the foregoing, this Office recommends that the Commission find no reason to believe that the NRSC violated the Act. However, in view of the possible confusion that may result from the continued use of the solicitation card at issue here, the Office of General Counsel recommends the Commission approve the attached letter to the NRSC from the Commission pointing out the NRSC's inaccurate statement of the Act's requirements in its solicitation.

III. RECOMMENDATIONS

1. Find no reason to believe that the National Republican Senatorial Committee violated the Act.
2. Approve the attached letter to the NRSC.
3. Close the file.

Lawrence M. Noble
General Counsel

Date

7/19/91

BY:


Lois G. Lerner
Associate General Counsel

Attachments

1. Complaint and NRSC Solicitation and Contribution Card
2. NRSC Response
3. Proposed Letter to NRSC

⁵ The only misrepresentation statute contained in the Act is found at 2 U.S.C. § 441h. That provision prohibits federal candidates and their employees and agents from fraudulently misrepresenting themselves as speaking, writing or otherwise acting for or on behalf of any other candidate or party in a way damaging to that candidate or party. Neither that provision nor its accompanying regulation at 11 C.F.R. § 110.9(b) are applicable to these circumstances.

91040360065

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
)
National Republican Senatorial) MUR 3147
Committee and James L. Hagen,)
as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 24, 1991, the Commission decided by a vote of 5-0 to take the following actions in MUR 3147:

1. Find no reason to believe that the National Republican Senatorial Committee violated the Act.
2. Approve the letter to the NRSC, as recommended in the General Counsel's Report dated July 19, 1991.
3. Close the file.

Commissioners Aikens, Elliott, Josefiak, McDonald and McGarry voted affirmatively for the decision; Commissioner Thomas did not cast a vote.

Attest:

7-25-91
Date

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

Received in the Commission: Mon., July 22, 1991 10:57 a.m..
Circulated to the Commission: Mon., July 22, 1991 4:00 p.m..
Deadline for vote: Wed., July 24, 1991 4:00 p.m.

91040860066



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 2, 1991

CLOSED

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Linda Burkhart
1192 Mile High Dr.
Casper, WY 82604

RE: MUR 3147

Dear Ms. Burkhart:

On July 24, 1991, the Federal Election Commission reviewed the allegations of your complaint dated October 25, 1990, and found that on the basis of the information provided in your complaint, and information provided by the National Republican Senatorial Committee ("NRSC"), there is no reason to believe the NRSC and its treasurer, James L. Hagen, violated the Federal Election Campaign Act of 1971 ("the Act"), as amended. Accordingly, on July 24, 1991, the Commission closed the file in this matter.

The Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Sincerely,

Lawrence M. Noble
General Counsel


BY: Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

91040860067



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 2, 1991

Jan W. Baran, Esquire
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

RE: MUR 3147
National Republican
Senatorial Committee and
James L. Hagen, as
treasurer

Dear Mr. Baran:

On October 31, 1990, the Federal Election Commission notified your clients, the National Republican Senatorial Committee and James L. Hagen, as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On July 24, 1991, the Commission found, on the basis of the information in the complaint, and information provided by you on behalf of your clients, that there is no reason to believe the National Republican Senatorial Committee ("NRSC") and James L. Hagen, as treasurer, violated the Federal Election Campaign Act of 1971, as amended (the "Act"), with regard to the attached solicitation for contributions. Accordingly, the Commission closed its file in this matter.

Even though the Commission determined that the NRSC's solicitation does not violate the Act, be advised that certain language on the accompanying contributor identification card inaccurately states the requirements of the Act. Specifically, the Act does not require political committees to ask for, maintain or disclose contributors' home phone numbers.

This matter will become a part of the public record within 30 days. If you wish to submit any materials to appear on the

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Mr. Jan W. Baran
Page 2

public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

Sincerely,

Lawrence M. Noble
General Counsel



BY: Lois G. Lerner
Associate General Counsel

Enclosure
GC Report

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3147

DATE FILMED 8/28/91 CAMERA NO. 4

CAMERAMAN AS

91040860070