



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF RMR # 3018

DATE FILMED 5/31/91 CAMERA NO. 4

CAMERAMAN AS

91040843174

Charlie
Luken
★★★ CONGRESS

96C 9915
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 JAN 25 AM 9:21

MUR 3218

October 12, 1990

Ms. Lois Lerner
Associate General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RE: LUKEN FOR CONGRESS COMMITTEE
Paul Sylvester, Treasurer
3842 Millsbrae Avenue
Cincinnati, Ohio 45209

BLACKWELL FOR CONGRESS COMMITTEE
7194 Pippin Road
Cincinnati, Ohio 45239

Dear Ms. Lerner:

I am writing on behalf of the Luken for Congress Committee to file an official complaint with the Federal Election Commission regarding a violation of the Federal Election Campaign Act by the Blackwell for Congress Committee. FEC regulations state that coordinated party expenditures for House candidates cannot exceed \$50,280. It is our understanding that the Blackwell for Congress Committee has accepted coordinated party contributions in excess of this limit.

I have enclosed two campaign brochures that were recently printed and mailed by the Ohio Republican Party on behalf of the Blackwell for Congress campaign. Both brochures were mailed to over 100,000 households in the first Congressional district at an estimated cost of \$70,000.

Based on conversations with Dorothy Hutchins at the Federal Election Commission it is our understanding that these mailings must be considered coordinated party expenditures. It is also our understanding that when a State party committee mails material promoting a candidate, the design and printing of that material must be solely that of the State party committee. One of the brochures mailed by the Ohio Republican Party was designed by the Blackwell for Congress Committee and distributed prior to the mailing by the State party.

3742 Glenmore Avenue * Cincinnati, Ohio 45211 * 513-661-5565 * Fax: 513-661-5830

Paid for by Luken for Congress Committee, Paul Sylvester, Treasurer

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 JAN 25 AM 10:31

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Ms. Lois Lerner
October 12, 1990
Page Two

In addition to the expenditures by the Ohio Republican Party it is our understanding that the National Republican Campaign Committee has provided media services, consulting services, research work, and considerable national staff support for the Blackwell for Congress campaign.

It is, therefore, our belief that the Blackwell for Congress Committee has accepted coordinated party contributions far in excess of what is allowable under the Federal Election Campaign Act.

We would appreciate the Commission looking into these violations immediately.

Thank you for your cooperation.

Sincerely,

Paul Sylvester

Paul Sylvester
Treasurer, Luken for Congress Committee

PS:hb

enclosures

Sworn and subscribed before me, in my presence on this
12th day of October, 1991.



Holly M. Schwegmann
Notary Public - State of Ohio

HOLLY M. SCHWEGMANN
Notary Public, State of Ohio
My Commission Expires Dec. 23, 1993

91040843176

October 15, 1990

Regional Chief Postal Inspector
Attention: MOSC
Eastern Region
1 Sala Cynwyd Plaza Suite E300
Sala Cynwyd, Pennsylvania 19004-9000

To Whom It May Concern:

This complaint is filed, pursuant to Section 114.2 of the Domestic Mail Manual (DMM), concerning an apparent violation of the postal laws by the Ohio Republican Party.

Specifically, in violation of the postal laws and regulations, the Ohio Republican Party used its nonprofit postal permit to mail a campaign brochure, designed by the Blackwell for Congress Committee, the campaign committee of Kenneth Blackwell, the Republican candidate for the First Congressional District of Ohio. The Ohio Party was, therefore, able to send this brochure at approximately one-half of the cost of a regular third-class mailing, which may have saved as much as \$5,000.

The Law

Under the Postal Reorganization Act of 1978 certain political committees, including a state committee of a national party, may qualify for use of a special bulk nonprofit mailing permit. 39 U.S.C. § 3926(e). Use of this permit is, however, subject to several restrictions. "An organization authorized to mail at the special bulk rates may mail only its own matter at those rates." (emphasis in the original) DMM § 625.51. A qualified organization may not lend the use of its authorization to mail at special bulk rates to any other organization. Id. Cooperative mailings may be made at the bulk rate only when each of the cooperating organizations is individually authorized to mail at the special bulk rate at the post office where the mailing is deposited. DMM § 625.52.

Apparent Violations

The Blackwell brochure, mailed by the Ohio Republican Party, was originally prepared and mailed by the Blackwell for Congress Committee. See Exhibit 1. Shortly thereafter, the

91040843177

Regional Chief Postal Inspector
October 15, 1990
Page 3

Ohio Republican Party sent a virtually identical brochure to over 100,000 households using its nonprofit postal permit.

The Ohio Party's mailing appears to have violated the postal regulations, which specifically prohibit a qualified party organization from mailing any materials that are not its own. DMM § 625.52. The material must be exclusively that of the qualified organization. But here the brochure was designed, printed and mailed by the Blackwell Committee then, apparently, simply reprinted by the Ohio Party.

While cooperative mailings are permitted under § 625.52 of the DMM, none of the requisite conditions are met in this case. The Blackwell Committee is not eligible to mail at special bulk rates. Individual candidates and their campaign committees do not qualify to mail at the special rates. Postal Operations Manual § 454.51. Nor, as required by the regulations, is the Blackwell Committee authorized to mail at the Columbus, Ohio post office, at which this particular mailing was deposited. Therefore, this mailing does not qualify as a permissible cooperative mailing.

This use of the nonprofit postal permit by the Ohio Party to send material prepared by and, in fact, already used by the Blackwell Committee is a violation of the postal regulations. We request that the Postal Service conduct an immediate and expedited investigation into this and any other abuses by the Ohio Republican Party of its postal permit. We also request, based on this apparent illegal use, that the Ohio Party's permit be suspended temporarily, and that all candidate mailings by the Party, in particular all mailings on behalf of the Blackwell campaign, be impounded until a thorough investigation of this matter is concluded. Finally, we request that the Postal Service take any other appropriate steps, including revocation of the Ohio Party's permit, based on this abuse of the privilege conferred exclusively to qualified political organizations.

Sincerely,

Enclosures

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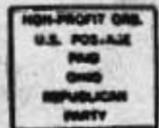
91040843178

I Did On My Summer Vacation

I worked with my Dad all summer. He is running for Congress. We worked so hard every day. We went so many places and met a lot of people. They were very nice to us. I really liked going to all the festivals and parades. I made a lot of new friends. I had so much fun working with my Dad.

Kristin Blackwell

Ohio Republican Party
172 E. State Street
Columbus, OH 43215



91040843179

CAR-RT SORT ** CR 28
HARRY BUDGE
3447 LYLEBURN PL.
CINCINNATI OH 45220

Post for the Ohio Republican Party

"The choice is clear. The First District, the nation and my administration need Ken Blackwell in Congress."
— President George Bush

Ken Blackwell's record, a decade of effort on behalf of families.

- Led effort to defeat school based "sex clinics" in Cincinnati schools. October, 1986.
- Led effort to ban sexually explicit cable programming. May, 1983.
- Supported legislation to make it illegal for parents to allow minors to consume alcohol or illicit drugs. May-June, 1986.
- Led effort to prohibit display of sexually explicit magazines to juveniles. February, 1984.
- Led effort to disclaim city support of the "Sister Mary Ignatius Explains It All for You" theatrical production, condemned as offensive and insulting to Catholics by Archbishop Pilarczyk. September, 1984.
- Led effort to proclaim January 22 as Right-to-Life Day in Cincinnati. January, 1984.
- Introduced legislation requiring the notification of parents of minors seeking abortions. 1980.

KEN BLACKWELL

leading the way
to protect
American values
and preserve
family values



We support Ken Blackwell for a very special reason... for dedication to life, family and values.
The Loper Family - Bedford



If it wasn't for Ken Blackwell, my children may have been recruited in a school "sex clinic".
The Loper Family - Bedford



Ken Blackwell is right when he says parents should have the right to know when to send their children to school and support education. We support Ken Blackwell.
The Loper Family - Bedford



Ken Blackwell is right when he says parents should have the right to know when to send their children to school and support education. We support Ken Blackwell.
The Loper Family - Bedford



Because of Ken we will not be sending our children to school where they will be recruited in a school "sex clinic".
The Loper Family - Bedford



We're glad that Ken has the guts to lead the fight against keeping off price liquor and prevent the war on life.
The Loper Family - Bedford

My wife Rosa and our three children at our first District home. We'd been married three years when we bought this home in 1971. Our oldest child Kimberly is going into her junior year at Syracuse University. Our son Raheem is a Junior at Walnut Hills High School. Our youngest, Kristen, is in the fourth grade. I hope to have an opportunity to meet you and your family sometime soon.



This is me
Kristen

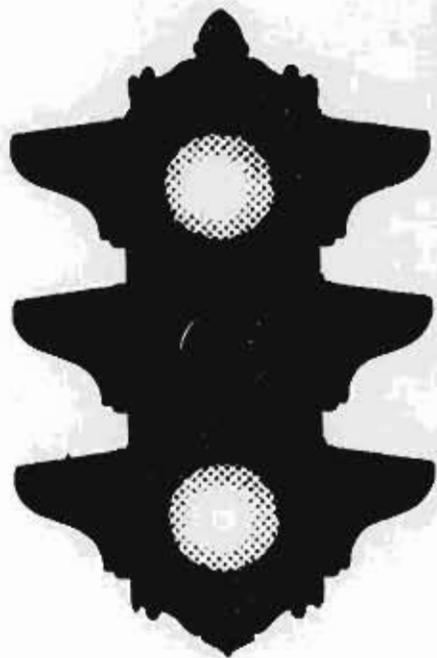
Sincerely, Ken

Blackwell for Congress

91040843180

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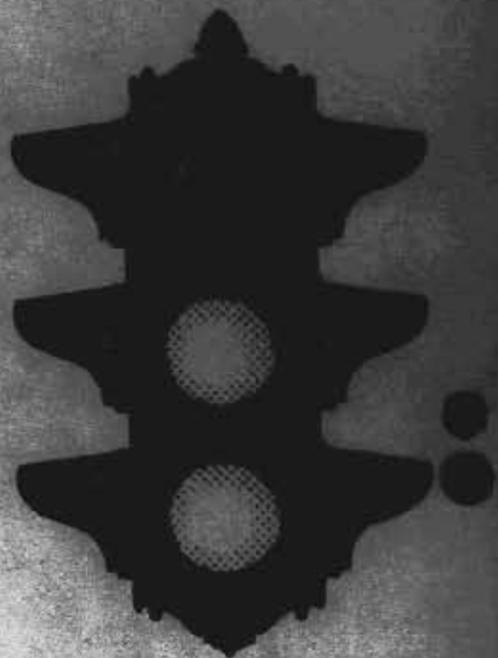
CAUTION



Printed by the Ohio Republican Party

**Please be sure to read
Charlie Luken's record
on taxes.**

STOP:



*OVER 100,000 BROCHURES MAILED BY OHIO
REPUBLICAN PARTY*



**Think for a moment
about the way taxes hit
your family's budget...**

Charlie Luken's Record on Taxes:

SUPPORTED CELESTE 90% TAX INCREASE

Charlie Luken was against repealing one of the largest state tax increases in Ohio history. This increase is still costing a typical First District family over \$400 each year.

SUPPORTED 15% EARNINGS TAX INCREASE

Charlie voted for a 15% increase in Cincinnati's earnings tax.

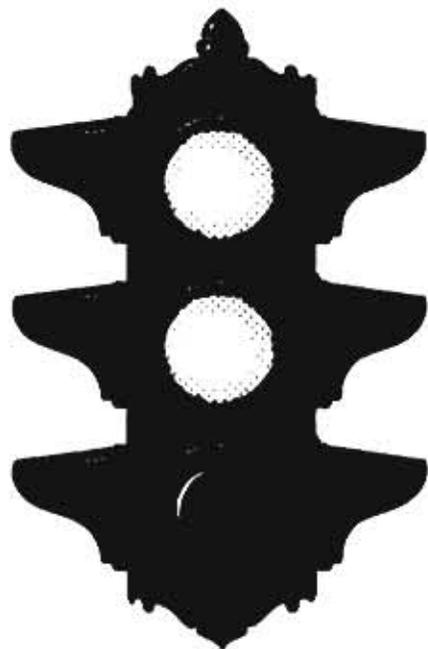
SUPPORTED 15% WATER RATE INCREASE

OPPOSED EFFORT TO MAKE IT HARDER FOR THE STATE GOVERNMENT TO RAISE TAXES

Charlie Luken opposed requiring that any future state tax increase be approved by 60% of Ohio state legislators (instead of a simple majority).

With his record
on taxes, what do
you suppose
Charlie Luken
would do as a
member of the
Tax-and-Spend
Majority in
Washington?

2 1 0 4 0 3 1 3 2
GO



Vote for
Ken Blackwell
for Congress...you
know where he
stands.



BROCHURE ORIGINALLY DISTRIBUTED BY BLACKWELL FOR
CONGRESS COMMITTEE.

91040843183

Hells, I'm Ken [redacted] I'm the
Republican candidate for Congress in
the First District. I've pulled
together some pictures taken over
the years to introduce you to me,
and my family. They also show
some of the experiences that I think
have prepared
me to do a good
job for you
in Congress.

843184
This picture was taken
earlier this year, when
I was serving in the
Bush administration
in Washington.





When my father came home from World War II Army service, the only housing available was in public projects. The picture at right is my Dad in uniform. On the left is my Dad playing ball with me when I was two. My parents gave me more than a baseball uniform in the projects. They gave me a belief that with education and hard work, I could make something of my life.

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Rona and me before the Hughes High School Senior Prom.



We were married two years later.

Graduated from Xavier in 1970. The Dallas Cowboys signed me, but their coaches agreed with the scouts that I belonged back in school! Received my Masters in Education a year later.



My first job out of school was teaching at Merry Junior High. After that I taught for several years at Xavier University, I still love teaching.

186

My first run for Cincinnati City Council. Every minute spent campaigning counted, because I won by only about 500 votes.



That's my wife Rosa.



The two most important women in my life, my mother, Dana, and Rosa.

Only in America! From a public housing project
to Mayor of Cincinnati in three decades. I didn't
spend much time behind that desk I felt the
Mayor's job was to be out in the community, providing
leadership in making Cincinnati a better and
safer place to live and bring up our children.



4



President Reagan
mentioned me that
he was a Republican
by choice and he
welcomed me into the
Party.

Jack Kemp, my boss at HUD this past year Jack gives me a lot of the credit for shaping the Project Hope proposal to make homeownership possible for people of all income levels and cut federal spending at the same time.



Secretary of the Treasury Nicholas Brady. We've spoken several times about ways to contain federal spending and reduce the deficit.



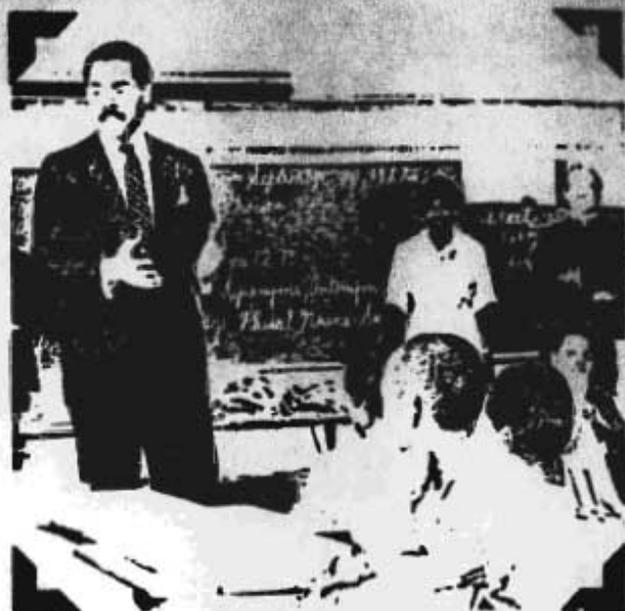
Talking with the President about First District issues after he recruited me earlier this year to run for Congress.

31040343188



My most recent teaching job was at the School of Government at Harvard University, as a Fellow of the Institute of Politics.

These are some of the young people we are trying to reach with the Cincinnati Youth Collaborative, the public-private initiative I co-founded to keep students in school through graduation, and also through the Catholic Inner City School Education Fund which I chaired. Education was the key to a productive life for me. It's their best hope too!



Chairing the Finance Committee was in some ways my most important job on Cincinnati City Council. Opened the budget process to the community. Called back all the laid-off police and firefighters with no new taxes.



My wife Rosa now. I'm very proud of her. She's the principal of our local Catholic school, St. Michael's.

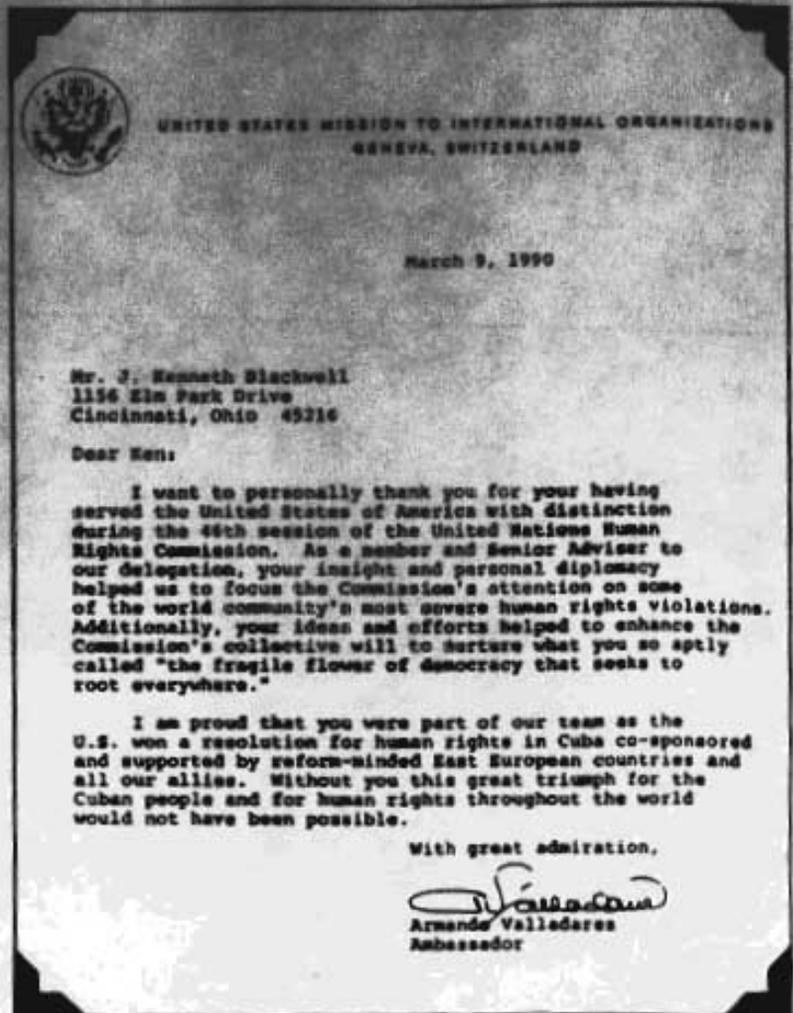


I was the Senior advisor to Ambassador Armando Valladares at the 46th Session of the U.N. Human Rights Commission in Geneva, Switzerland. I was very gratified by the letter he wrote about my role in securing the first condemnation of Cuban violations ever passed by this body.



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Below with Enrique Bermudez, the leader of the Nicaraguan Freedom Fighters. Since this was taken in 1988, free elections have thrown out the communist Sandinista regime I've been going to Central America since 1981 in hopes of helping to produce triumphs for democracy like this one.



With our youngest, Kristen, at the White House.



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My wife Rosa and our three children at our first District home. We'd been married three years when we bought this home in 1971. Our oldest child Kimberly is going into her junior year at Syracuse University. Our son Keshawn is a Junior at Walnut Hills High School. Our youngest, Kristen, is in the fourth grade at the Academy of World Languages in the Cincinnati Public Schools.

Thanks for looking through this get-acquainted album. As you review my qualifications and positions during the campaign, I hope you'll decide that I'm the right person to represent you and your family in Congress.

I also hope to have an opportunity sometime soon to meet you personally.

Sincerely,
Ken

OVER 100,000 BROCHURES MAILED BY
OHIO REPUBLICAN PARTY

91040843192

● ● Hello. I'm Ken McClure. I'm the Republican candidate for Congress in the First District. I've pulled together some pictures taken over the years to introduce you to me, and my family. They also show some of the experiences that I think have prepared me to do a good job for you in Congress.

843193

This picture was taken earlier this year when I was serving in the Bush administration in Washington.





When my father came home from World War II Army service, the only housing available was in public projects. The picture at right is my Dad in uniform. On the left is my Dad playing ball with my when I was two. My parents gave me more than a baseball uniform in the projects. They gave me a belief that with education and hard work, I could make something of my life.

91040843194



Rona and me before the Hughes High School Senior Prom.



We were married two years later.

Graduated from Xavier in 1970. The Dallas Cowboys signed me, but their coaches agreed with the Jesuits that I belonged back in school! Received my Masters in Education a year later.



195

My first run for Cincinnati City Council. Every minute spent campaigning counted, because I won by only about 500 votes.

My first job out of school was teaching at Merry Junior High. After that I taught for several years at Xavier University, I still love teaching.



← That's my wife Rosa.



The two most important women in my life, my mother, Dana, and Rosa.

Only in America! From a public housing project to Mayor of Cincinnati in three decades. I didn't spend much time behind that desk. I felt the Mayor's job was to be out in the community, providing leadership in making Cincinnati a better and safer place to live and bring up our children.



President Reagan reminded me that he too is a Republican by choice, and he welcomed me into the Party.

Jack Kemp, my boss at HUD this past year. Jack gives me a lot of the credit for shaping the Project Hope proposal to make homeownership possible for people of all income levels and cut federal spending at the same time.



Secretary of The Treasury Nicholas Brady. We've spoken several times about ways to contain federal spending and reduce the deficit.



Talking with the President about First District issues after he recruited me earlier this year to run for Congress.

343197

9104



My most recent teaching job was at the School of Government at Harvard University, as a Fellow of the Institute of Politics.

These are some of the young people we are trying to reach with the Cincinnati Youth Collaborative, the public-private initiative I co-founded to keep students in school through graduation, and also through the Catholic Inner City School Education Fund which I chaired. Education was the key to a productive life for me. It's their best hope too!



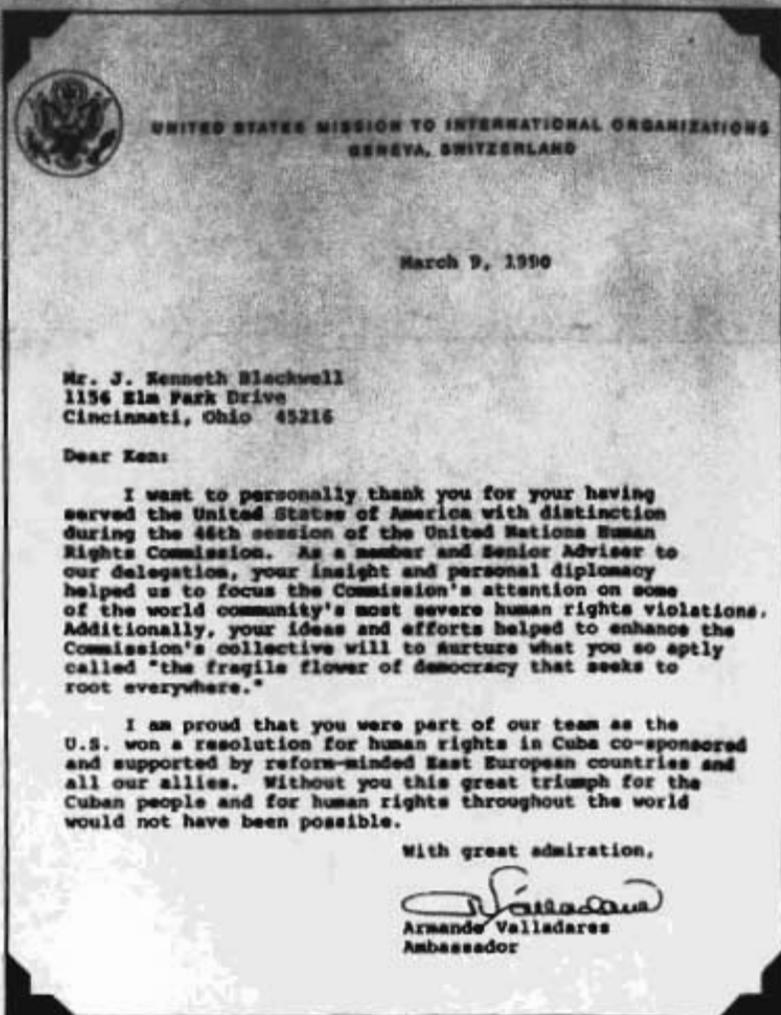
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My wife Rosa now. I'm very proud of her. She's the principal of our city high school, Hughes.



I was the Senior advisor to Ambassador Armando Valladares at the 46th Session of the U.N. Human Rights Commission in Geneva, Switzerland. I was very gratified by the letter he wrote about my role in securing the first condemnation of Cuban violations ever passed by this body.



Belau with Enrique Bermudez,
the leader of the Nicaraguan
Freedom Fighters. Since this
was taken in 1988, free elections
have thrown out the communist
Sandinista regime I've been going
to Central America since 1981 in
- hopes of helping to produce
triumphs for democracy like
this one.



With our youngest, Kristen,
at the White House.



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My wife Rosa and our three children at our first District home. We'd been married three years when we bought this home in 1971. Our oldest child Kimberly is going into her junior year at Syracuse University. Our son Rakshann is a Junior at Walnut Hills High School. Our youngest, Kristen, is in the fourth grade at the Academy of World Languages in the Cincinnati Public Schools.

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I also hope to have an opportunity sometime soon to meet you personally.

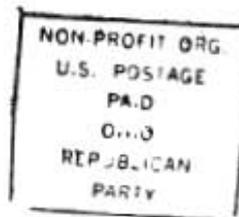
Sincerely,
Ken



My wife Rose and our three children
Kim, Kathleen and Kristin at the first
birth home we bought 19 years ago.
Thanks for looking through this get-
acquainted album. As you know my
qualifications and positions during
the Campaign, I hope you'll decide
that I'm the right person to represent you and your family in Congress.

Sincerely, Rep Blackwell

Ohio Republican Party
117 E. State Street
Columbus, Ohio 43215



CAR-RT SORT

** CR 22

CATHERINE MANGINO
4019 CLIFTON AV
CINCINNATI

OH 45220



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 28, 1991

Paul Sylvester, Treasurer
Luken for Congress Committee
3742 Glenmore Avenue
Cincinnati, Ohio 45211

RE: MUR 3218

Dear Mr. Sylvester:

This letter acknowledges receipt on January 25, 1991, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by the Blackwell for Congress Committee and Robert M. Schiller, as treasurer, Ohio Republican Party Federal Candidates Campaign and Virginia S. Cheney, as treasurer, and National Republican Congressional Committee-Expenditures and Jack McDonald, 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 3218. 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

91040843202



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 28, 1991

Robert M. Schiller, Treasurer
Blackwell for Congress Committee
7194 Pippin Road
Cincinnati, Ohio 45239

RE: NUR 3218

Dear Mr. Schiller:

The Federal Election Commission received a complaint which alleges that the Blackwell for Congress 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 NUR 3218. 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.

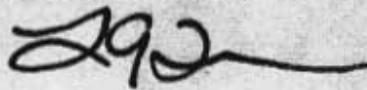
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed 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.

91040343203

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

Sincerely,

Lawrence M. Noble
General Counsel



BY: Lois G. Lerner
Associate General Counsel

Enclosures

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

cc: Kenneth J. Blackwell

91040843204



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 28, 1991

Jack McDonald, Treasurer
National Republican Congressional
Committee-Expenditures
320 First Street
Washington, D.C. 20003

RE: MUR 3218

Dear Mr. McDonald:

The Federal Election Commission received a complaint which alleges that the National Republican Congressional Committee-Expenditures 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 3218. Please refer to this number in all future correspondence.

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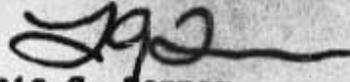
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91040843205

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

Sincerely,

Lawrence M. Noble
General Counsel



BY: Lois G. Lerner
Associate General Counsel

Enclosures

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

91040843206



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 28, 1991

Virginia S. Cheney, Treasurer
Ohio Republican Party
Federal Candidates Campaign
172 East State Street
Suite 400
Columbus, Ohio 43215

RE: NUR 3218

Dear Ms. Cheney:

The Federal Election Commission received a complaint which alleges that the Ohio Republican Party Federal Candidates Campaign 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 NUR 3218. 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.

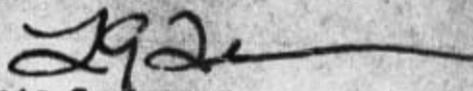
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91040843207

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

Sincerely,

Lawrence N. Noble
General Counsel



BY: Lois G. Lerner
Associate General Counsel

Enclosures

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

91040843208

OGC 0084

THOMPSON, HINE AND FLORY

ATTORNEYS AT LAW

SUITE 1400

312 WALNUT STREET

CINCINNATI, OHIO 45202-4029

(513) 352-6700

FAX (513) 241-4771

TELEX 938003

WRITER'S DIRECT

DEAL NUMBER

AKRON, OHIO
BRUSSELS, BELGIUM
CLEVELAND, OHIO
COLUMBUS, OHIO
DAYTON, OHIO
LANDOVER, MARYLAND
PALM BEACH, FLORIDA
WASHINGTON, D.C.

February 13, 1991

(513) 352-6635

VIA FEDERAL EXPRESS

Jeffrey Long, Esquire
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

Re: MUR 3218

Dear Mr. Long:

I am counsel to the Ohio Republican Party, and will shortly be forwarding you a "Designation of Counsel" form in respect of the above-captioned MUR. We are presently engaged in several matters which have necessitated that we request an extension of time within which to file a response. The fifteenth day from our receipt of the materials is Friday, February 15, 1991. We request an extension to Wednesday, March 6, 1991.

A number of the individuals whom it will be necessary for us to interview are out of Ohio, including the candidate. In addition, a number of the individuals responsible for the record keeping in that race are involved in a project which must be completed by February 20, 1991. Your forbearance will be greatly appreciated.

I would note in closing that the Treasurer of the Ohio Republican Party is Robert K. Wilson, not Virginia Cheney. I believe we have previously noted this change, in connection with a prior MUR. In any case, we shall submit another Amended Form 1 in connection with this MUR in hopes that will clear it up. Thank you very much.

Sincerely,

Gordon M. Strauss
GORDON M. STRAUSS

GMS101.PD

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FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 21, 1991

Gordon M. Strauss, Esquire
Thompson, Hine and Flory
Suite 1400
312 Walnut Street
Cincinnati, Ohio 45202-4029

RE: MUR 3218
Ohio Republican Party and
Virginia Cheney, as
treasurer

Dear Mr. Strauss:

This is in response to your letter dated February 13, 1991, which we received on February 14, 1991, requesting an extension of 20 days to respond to the complaint in the above-referenced matter. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on March 6, 1991.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

91040843210

★ **BLACKWELL
CONGRESS**

7194 Pippin Road, at Banning (Lakeridge Complex) • Cincinnati, Ohio 45239 • Telephone (513) 931-1990 • FAX (513) 931-1995

OGC 0155

February 15, 1991

Lawrence M. Noble
General Counsel
Federal Elections Commission
Washington, D.C. 20463

Attn.: Lois G. Lerner
Associate General Counsel

RE: MUR 3218

Dear Mr. Noble:

In reference to your correspondence dated January 28, 1991, I am officially requesting an extension of time for response. This request is necessitated for the following reasons:

- The Blackwell for Congress Committee had an official change in Treasurers in late October, 1990. (Statement of Organization attached.) Mr. Schiller, the past Treasurer, left the accounting firm of Ernst & Young altogether, making the transfer of records somewhat difficult. As well, we are trying to contact Mr. Schiller for follow-up information.
- Since key members of the Campaign Committee are no longer in touch on a regular basis, we need to contact them in order to fully respond.
- The Campaign Committee no longer operates from 7194 Pippin Road. Consequently, the material requesting information for MU 3218 was forwarded and not received until mid-February, even though it was dated January 28, 1991.

I would appreciate your consideration of this request and look forward to your reply. Thank you.

Sincerely,

Mary C. Young
Mary C. Young
Campaign Director/Deputy Treasurer

Enclosure

P.S. The official current address for the Committee is:
Mary C. Young, 925 Marion Avenue #1, Cincinnati, OH 45229.

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OFFICE OF GENERAL COUNSEL
91 FEB 25 PM 3:42

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MAIL ROOM
91 FEB 25 AM 11:27

STATEMENT OF ORGANIZATION

(See reverse side for instructions)

1. (a) NAME OF COMMITTEE IN FULL <input type="checkbox"/> (Check if name is changed) Blackwell for Congress Committee	2. DATE October 16, 1990
(b) Number and Street Address <input checked="" type="checkbox"/> (Check if address is changed) 7194 Pippin Road, at Banning (Lakeridge Complex)	3. FEC IDENTIFICATION NUMBER C00182816
(c) City, State and ZIP Code Cincinnati, Ohio 45239	4. IS THIS STATEMENT AN AMENDMENT? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

B. TYPE OF COMMITTEE (Check one)

- (a) This committee is a principal campaign committee. (Complete the candidate information below.)
- (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)
- | Name of Candidate | Candidate Party Affiliation | Office Sought | State/District |
|-------------------|-----------------------------|---------------|----------------|
| | | | |
- (c) This committee supports/opposes only one candidate _____ and is NOT an authorized committee.
(name of candidate)
- (d) This committee is a _____ committee of the _____ Party.
(National, State or subordinate) (Democratic, Republican, etc.)
- (e) This committee is a separate segregated fund.
- (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund or a party committee.

6. Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship

Type of Connected Organization
 Corporation Corporation w/o Capital Stock Labor Organization Membership Organization Trade Association Cooperative

7. Custodian of Records: Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.

Full Name	Mailing Address	Title or Position
Donald C. Auberger	250 E. Fifth Street 1300 Chiquita Center Cincinnati, Ohio 45202	Treasurer

8. Treasurer: List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name	Mailing Address	Title or Position
Donald C. Auberger	250 E. Fifth Street 1300 Chiquita Center Cincinnati, Ohio 45202	Treasurer
Mary C. Young	925 Marion Ave. (45229)	Asst. Treasurer

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

TYPE OR PRINT NAME OF TREASURER Donald C. Auberger	SIGNATURE OF TREASURER <i>Donald C. Auberger</i>	DATE 10/16/90
--	---	-------------------------

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g. ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

	For further information contact: Federal Election Commission Toll-free 800-424-9530 Local 202-376-3120
--	---

FEC FORM 1
(revised 4/87)

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 1, 1991

Mary C. Young, Deputy Treasurer
Blackwell for Congress Committee
925 Marion Avenue #1
Cincinnati, Ohio 45229

RE: MUR 3218
Blackwell for Congress
Committee and Donald C.
Auberger, as treasurer

Dear Ms. Young:

This is in response to your letter dated February 15, 1991, which we received on February 25, 1991, requesting an extension of time to respond to the complaint in the above-mentioned matter. 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 18, 1991.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

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WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D. C. 20008
(202) 429-7000

JAN WITOLD BARAN
(202) 429-7330

February 15, 1991

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

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

Attn: Jeffrey Long

Re: MUR 3218 (National Republican
Congressional Committee and
Jack McDonald, as Treasurer)

RECEIVED
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OFFICE OF GENERAL COUNSEL
91 FEB 15 PM 4:17

Dear Mr. Noble:

This Response, along with the attached Affidavit and materials, is submitted on behalf of the National Republican Congressional Committee (NRCC) in response to a Complaint filed by the Luken for Congress Committee and designated Matter Under Review ("MUR") 3218.^{1/} For the reasons set forth herein, the Federal Election Commission should find no reason to believe that the NRCC has violated the Federal Election Campaign Act of 1971, as amended (the "Act").

Contributions and Expenditures of the NRCC

The Complaint in this Matter is targeted at the Blackwell for Congress Committee. However, as an

^{1/} The National Republican Congressional Committee amended its Statement of Organization by letter dated August 23, 1989 which indicated that Jack McDonald had resigned as Treasurer.

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WILEY, REIN & FIELDING

Mr. Lawrence M. Noble, Esq.
February 15, 1991
Page 2

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afterthought the Complaint states, "it is our understanding that the National Republican Campaign Committee^{2/} has provided media services, consulting services, research work, and considerable national staff support for the Blackwell for Congress campaign." Complaint at 2. The apparent inference here is that the NRCC exceeded the permissible limits for its direct contributions to, and coordinated expenditures on behalf of, the Blackwell for Congress Committee. This allegation is meritless.

The NRCC was permitted to make direct contributions to the Blackwell Campaign of up to \$5,000 per election. 2 U.S.C. § 441a(a)(2). As the NRCC's disclosure reports on file with the FEC indicate, the NRCC did, in fact, make direct contributions to the Blackwell primary campaign totalling \$5,000, and another \$5,000 to the Blackwell general election campaign. See Affidavit of Nancy Marshall in MUR 3218 (hereinafter "Marshall Aff.") at ¶¶ 3-4, attached hereto as Exhibit 1.^{2/} In both cases, the NRCC contributions were within the permissible limits.

^{2/} We assume that the Complaint misidentified the National Republican Congressional Committee as the National Republican Campaign Committee.

^{2/} Copies of the relevant pages of the NRCC's disclosure reports of direct contributions are enclosed with the Affidavit of Nancy Marshall at Tabs A and B.

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Mr. Lawrence M. Noble, Esq.
February 15, 1991
Page 3

In addition, both the Ohio Republican Party and the Republican National Committee authorized the NRCC to act as their agent for the purpose of making coordinated expenditures on behalf of the Blackwell for Congress Committee pursuant to 2 U.S.C. § 441a(d)(3). Copies of those letters of authorization are attached hereto as Exhibit 2. Thus, the NRCC was authorized to make coordinated expenditures in connection with the Blackwell general election campaign of up to \$50,140.

Within the limitations of the Act, the NRCC did make coordinated expenditures for the benefit of the Blackwell for Congress Committee totalling \$50,106.32. Marshall Aff. at ¶ 5. Copies of the relevant pages of the NRCC's disclosure reports of coordinated expenditures are enclosed with the Affidavit of Nancy Marshall at Tab C.

Credibility of the Complaint

What is particularly disturbing about this Complaint is that the NRCC has not been informed of the particular nature the activity from which the Complainant apparently infers a violation. The Commission's regulations provide that a complaint should comply with the following provisions:

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Mr. Lawrence M. Noble, Esq.
February 15, 1991
Page 4

(2) Statements which are not based upon personal knowledge should be accompanied by an identification of the source of the information which gives rise to the complainants belief in the truth of such statements;

(3) It should contain a clear and concise recitation of the facts which describe a violation of a statute or regulation over which the Commission has jurisdiction; and

(4) It should be accompanied by any documentation supporting the facts alleged if such documentation is known of, or available to, the complainant.

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11 C.F.R. § 111.4(d)(2)-(4) (emphasis supplied). With respect to any allegations against the NRCC, none of these requirements have been met by the Complaint in this Matter. The Complaint does not provide any specific allegation or factual recitation that would suggest any violation of the Act. Nor does the Complaint offer any source of information or supporting documents for an alleged violation. It merely states that it is the Complainant's "understanding" that a violation occurred.

Conclusion

For the reasons set forth above, the Commission should find no reason to believe that the NRCC violated the Act in this Matter. All the NRCC's contributions and expenditures in connection with the Blackwell for Congress Committee are completely within the limits of the Act. Moreover, this Complaint does not even meet the Commission's minimal

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Mr. Lawrence M. Noble, Esq.

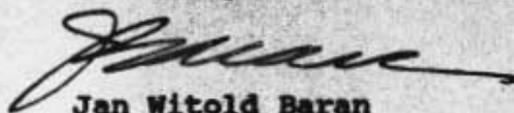
February 15, 1991

Page 5

requirements that would provide the Respondents with reasonable notice of any allegations against them.

Accordingly, the Commission should find no reason to believe that NRCC and its treasurer violated the Act.

Sincerely,



Jan Witold Baran



Steven M. Mister

Counsel for the National
Republican Congressional
Committee, and Jack McDonald,
as Treasurer

Enclosures: Exhibit 1 - Affidavit of Nancy Marshall
Exhibit 2 - Letters of Authorization
Exhibit 3 - Statement of Designation of Counsel

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BEFORE THE FEDERAL ELECTION COMMISSION

City of Washington)
District of Columbia) MUR 3218

AFFIDAVIT OF NANCY MARSHALL

NANCY MARSHALL, first being duly sworn, deposes and says:

1. I am Nancy Marshall. I have served as the Assistant Treasurer of the National Republican Congressional Committee ("NRCC") since May 11, 1984.
2. All contributions to and coordinated expenditures of the NRCC on behalf of the Blackwell for Congress Committee have been reported to the Federal Election Commission on the NRCC's regular disclosure reports.
3. As reflected in those reports, the NRCC made the following direct contributions to the Blackwell for Congress Committee designated for the 1990 primary election campaign:

April 19, 1990	\$4,655.00
April 25, 1990	\$345.00

These contributions total \$5,000. True copies of the relevant pages of the NRCC's reports are attached hereto at Tab A.

4. Also, as reflected on those reports, the NRCC made the following direct contributions to the Blackwell for

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Congress Committee designated for the 1990 general election campaign:

May 5, 1990	\$72.56
June 29, 1990	\$4,000.00
August 23, 1990	\$134.45
October 8, 1990	\$62.66
October 22, 1990	\$396.00
November 6, 1990	\$334.33

These contributions total \$5,000. True copies of the relevant pages of the NRCC's reports are attached hereto at Tab B.

5. The NRCC also made the following coordinated expenditures on behalf of the Blackwell for Congress Committee as reflected in the NRCC's disclosure reports:

September 17, 1990	\$49,699.65
October 15, 1990	\$351.00
November 6, 1990	\$55.67

These coordinated expenditures total \$ 50,106.32. True copies of the relevant pages of the NRCC's reports are attached hereto at Tab C.

6. To my knowledge, all of these contributions and coordinated expenditures are within the permissible limits of the NRCC as established by the Federal Election Campaign Act of 1971, as amended.

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The above information is true and correct to the best of my knowledge, information, and belief.

Nancy Marshall
Nancy Marshall

Washington, D.C.

Signed and sworn to before me
this 15 day of February, 1991.

Roberta P. Barbee
Notary Public

My Commission Expires: 1-31-93



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A

ITEMIZED DISBURSEMENTS

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NAME OF COMMITTEE: NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE - EXPENDITURES

FULL NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
SEN BLACKWELL FOR CONGRESS 100 ELM PARK DRIVE CINCINNATI OH 45216	OH / 01 PRIMARY CONTRIB	4/19/90	\$4655.00
DISBURSEMENT FOR: PRIMARY			YTD TOTAL \$5000.00
SEN BLANTON FOR CONGRESS MRS. MARY BLANTON P.O. BOX 1828 SALISBURY, NC 28145	NC / 08 PRIMARY CONTRIB	4/30/90	\$497.00
DISBURSEMENT FOR: PRIMARY			YTD TOTAL \$4999.26
JOHN CARRINGTON FOR CONGRESS P.O. BOX 30576 RALEIGH NC 27622	NC / 04 PRIMARY CONTRIB	4/20/90	\$5000.00
DISBURSEMENT FOR: PRIMARY			YTD TOTAL \$5000.00
HALLOCK CONGRESSIONAL CMTE. TREAS: DAVID WESMAN P.O. BOX 76 ROCKFORD IL 61105	IL / 16 PRIM. DEBT RETI	4/19/90	\$5000.00
DISBURSEMENT FOR: PRIMARY			YTD TOTAL \$5000.00
PICK HAWKS FOR CONGRESS COMM. TREAS: JEFF TURNER P.O. BOX 5522 FOOT WAYNE IN 46895	IN / 04 PRIMARY CONTRIB	4/30/90	\$145.00
DISBURSEMENT FOR: PRIMARY			YTD TOTAL \$4999.54
HILER FOR CONGRESS COMM. TREAS: RICHARD SCHMITT P.O. BOX 118 LAPORTE, IN 46350	IN / 03 PRIMARY CONTRIB	4/30/90	\$4000.00
DISBURSEMENT FOR: PRIMARY			YTD TOTAL \$4119.95
MAURY MEYERS FOR CONGRESS COMBTEX TREAS: J.B. KINSLOW, SR. P.O. BOX 5528 BEAUMONT, TX 77706	TX / 09 GENERAL CONTRIB	4/19/90	\$4000.00
DISBURSEMENT FOR: GENERAL			YTD TOTAL \$4000.00

SUBTOTAL OF DISBURSEMENTS THIS PAGE \$23297.00

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ITEMIZED DISBURSEMENTS
(MEMO ENTRIES)

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COMMITTEE: NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE - EXPENDITURES

FULL NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
PAKER FOR CONGRESS COMMITTEE TREAS: ALVIN CORSO, JR. 5115 FLORIDA BLVD. HAICH ROUGE, LA 70806	LA / 06 MEDIA SERVICES	4/04/90	\$36.81
DISBURSEMENT FOR: PRIMARY			YTD TOTAL \$226.40
FULL NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
FOR THE JOE BARTON FOR CONG. TREAS: MILLIE COLUNQUA P.O. BOX 1444 ENNIS, TX 75119	CONN.TX / 06 MEDIA SERVICES	4/17/90	\$15.25
DISBURSEMENT FOR: GENERAL			YTD TOTAL \$42.75
FULL NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
REFUTEER FOR CONGRESS COMM. TREAS: JIM HEWITT P.O. BOX 94794 LINCOLN, NE 68509	NE / 01 MEDIA SERVICES	4/20/90	\$32.00
DISBURSEMENT FOR: PRIMARY			YTD TOTAL \$84.00
FULL NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
BILIRAKIS FOR CONGRESS TREAS: ANTHONY SAMAROS P.O. BOX 1077 TARPON SPRINGS, FL 34688	FL / 09 MEDIA SERVICES	4/19/90	\$4.00
DISBURSEMENT FOR: PRIMARY			YTD TOTAL \$24.00
FULL NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
MR BLACKWELL FOR CONGRESS 1254 ELM PARK DRIVE CINCINNATI OH 45216	OH / 01 MEDIA SERVICE	4/25/90	\$345.00
DISBURSEMENT FOR: PRIMARY			YTD TOTAL \$5000.00
FULL NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
MEMBER OF SHERWOOD BOEHLERT THOMAS GRAZIANO PO BOX C ROCKA, NY 13503	NY / 25 MEDIA SERVICES NY / 25 MEDIA SERVICES NY / 25 MEDIA SERVICES	4/04/90 4/04/90 4/24/90	\$36.81 \$26.00 \$30.00
DISBURSEMENT FOR: PRIMARY			YTD TOTAL \$242.20
FULL NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
THE SEN BURTON FOR CONGRESS COMMITTEE BOX 50593 INDIANAPOLIS IN 46250	IN / 06 MEDIA SERVICES IN / 06 MEDIA SERVICES IN / 06 MEDIA SERVICES IN / 06 MEDIA SERVICES IN / 06 MEDIA SERVICES	4/04/90 4/18/90 4/19/90 4/25/90 4/27/90	\$47.00 \$23.50 \$4.00 \$23.50 \$2.00
DISBURSEMENT FOR: PRIMARY			YTD TOTAL \$190.50

SUBTOTAL OF DISBURSEMENTS THIS PAGE \$625.87

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ITEMIZED DISBURSEMENTS
(MEMO ENTRIES)

PAGE 1
LINE NO. 21

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COMMITTEE: NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE - EXPENDITURES

NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
BAKER FOR CONGRESS COMMITTEE	LA / 06 MEDIA SERVICES	5/09/90	\$28.05
ALVIN CORSO, JR.	LA / 06 MEDIA SERVICES	5/16/90	\$31.00
FLORIDA BLVD. LA ROUGE, LA 70006	LA / 06 MEDIA SERVICES	5/23/90	\$36.81
DISBURSEMENT FOR: PRIMARY			YTD TOTAL \$322.26

NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
THAKIS FOR CONGRESS	FL / 09 MEDIA SERVICES	5/16/90	\$31.00
ANTHONY SAMARKOS	FL / 09 MEDIA SERVICES	5/24/90	\$6.00
P.O. BOX 1077 CARPON SPRINGS, FL 34688			
DISBURSEMENT FOR: PRIMARY			YTD TOTAL \$61.00

NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
BLACKWELL FOR CONGRESS	OH / 01 SURVEY	5/10/90	\$72.56
7104 PIPPIN RD @ BANNING COLUMBINATI OH 45239			
DISBURSEMENT FOR: GENERAL			YTD TOTAL \$72.56

NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
FRIENDS OF SHERWOOD BOEHLERT	NY / 25 MEDIA SERVICES	5/02/90	\$32.72
THOMAS GRAZIANO	NY / 25 MEDIA SERVICES	5/09/90	\$28.05
PO BOX C MICA NY 13503	NY / 25 MEDIA SERVICES	5/23/90	\$36.81
DISBURSEMENT FOR: PRIMARY			YTD TOTAL \$339.78

NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
BOEHNER FOR CONGRESS	OH / 08 SURVEY	5/15/90	\$83.13
JOEY SPECKHART, ASST. 7508 CINCI-DAYTON ROAD WINCHESTER, OH 45069			
DISBURSEMENT FOR: GENERAL			YTD TOTAL \$83.13

NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
MARGARET BLEWSTER FOR CONG.	WV / 04 MEDIA SERVICE	5/15/90	\$146.16
1400 GAY GROVE AVENUE WHEELER WV 24701			
DISBURSEMENT FOR: GENERAL			YTD TOTAL \$146.16

NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
BROWN FOR SENATE	CO / AL MEDIA SERVICE	5/02/90	\$32.72
NANCI BROWN PO BOX 1445 ENGLEWOOD CO 80150			
DISBURSEMENT FOR: PRIMARY			YTD TOTAL \$67.66

SUBTOTAL OF DISBURSEMENTS THIS PAGE \$565.01

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ITEMIZED DISBURSEMENTS

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COMMITTEE: NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE - EXPENDITURES

NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
ACKWELL FOR CONGRESS TIPPIN RD # BANNING CINCINNATI OH 45239	OH / 01 GENERAL ELECTIO	6/29/90	\$4000.00
EXPENSE FOR: GENERAL			YTD TOTAL \$4072.56

NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
KENNER FOR CONGRESS SPECKHART, ASST. CINCI-DAYTON ROAD WESTER, OH 45069	OH / 08 DEBT RETIREMENT	6/06/90	\$5000.00
EXPENSEMENT FOR: PRIMARY			YTD TOTAL \$5000.00

NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
ROWN FOR CONGRESS COMM. NANCY LAMPTON BOX 2801 LOUISVILLE KY 40201	KY / 03 DEBT RETIREMENT	6/15/90	\$5000.00
EXPENSEMENT FOR: PRIMARY			YTD TOTAL \$5000.00

NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
OF BILL CABANISS LEE STYSLINGER BIRMINGHAM AL 35253	AL / AL GENERAL CONTRIB	6/25/90	\$5000.00
EXPENSEMENT FOR: GENERAL			YTD TOTAL \$5000.00

NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
FOR U.S. SENATE VERN DOLLEN NORTH 93RD STREET SEASIDE NE 66134	NE / AL GENERAL CONTRIB	6/25/90	\$5000.00
EXPENSEMENT FOR: GENERAL			YTD TOTAL \$5000.00

NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
FOR CONGRESS MICHAEL NICHOLSON 1200 50 3RD FL. PORTLAND ME 04101	ME / 01 DEBT RETIREMENT	6/27/90	\$5000.00
EXPENSEMENT FOR: PRIMARY			YTD TOTAL \$5000.00

NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
FOR CONGRESS ANNE ROBERTS 1 STREET BETHARDINO CA 92408	CA / 36 PRIMARY CONTRIB	6/01/90	\$3000.00
EXPENSEMENT FOR: PRIMARY			YTD TOTAL \$4868.75

TOTAL OF DISBURSEMENTS THIS PAGE \$32000.00

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ITEMIZED DISBURSEMENTS
(MEMO ENTRIES)

PAGE 1
LINE NO. 21

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PURPOSES OTHER THAN USING THE NAME AND ADDRESS OF ANY POLITICAL COMMITTEE TO
OBTAIN CONTRIBUTIONS FROM SUCH COMMITTEE.

COMMITTEE: NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE - EXPENDITURES

NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
SEN. ALLARD FOR CONGRESS ATTN: DOUG MARKLEY BOX 32 SAND CO 80539	CO / 04 PRINTING	8/21/90	\$134.45
DISBURSEMENT FOR: GENERAL			YTD TOTAL \$4134.45
NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
PAPER FOR CONGRESS COMMITTEE TREAS: ALVIN CORSO, JR. FLORIDA BLVD. PATON ROUGE, LA 70806	LA / 06 MEDIA SERVICES	8/01/90	\$26.77
DISBURSEMENT FOR: PRIMARY			YTD TOTAL \$479.35
NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
SEN. BLACKWELL FOR CONGRESS 1194 PIPPIN RD @ BANNING CINCINNATI OH 45239	OH / 01 PRINTING	8/23/90	\$134.45
DISBURSEMENT FOR: GENERAL			YTD TOTAL \$4207.01
NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
FRIENDS OF SHERWOOD BOEHLERT TREAS: THOMAS GRAZIANO BOX C MICA NY 13503	NY / 25 MEDIA SERVICES	8/01/90	\$26.77
DISBURSEMENT FOR: PRIMARY			YTD TOTAL \$610.96
NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
SEN. BOEHNER FOR CONGRESS JULIE SPECKHART, ASST. CINCI-DAYTON ROAD CHESTER OH 45069	OH / 08 SURVEY	8/01/90	\$2500.00
DISBURSEMENT FOR: GENERAL			YTD TOTAL \$2730.83
NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
SEN. BURTON FOR CONGRESS COMMITTEE BOX 50543 INDIANAPOLIS IN 46250	IN / 06 MEDIA SERVICES	8/08/90	\$12.00
DISBURSEMENT FOR: GENERAL			YTD TOTAL \$257.43
NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
SEN. CLINGER OF CONG. BILL CLINGER TREAS: JOHN JARZAB BOX 631 PA 16365	PA / 23 MEDIA SERVICES PA / 23 MEDIA SERVICES	8/01/90 8/03/90	\$26.77 \$133.50
DISBURSEMENT FOR: GENERAL			YTD TOTAL \$277.77
SUBTOTAL OF DISBURSEMENTS THIS PAGE			\$2994.71

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ITEMIZED DISBURSEMENTS
MEMORANDUM

COPIES FROM SUCH RECORDS OR STATEMENTS MAY NOT BE SOLD OR USED FOR THE PURPOSE OF SOLICITING CONTRIBUTIONS OR FOR COMMERCIAL PURPOSES, OTHER THAN USING THE NAME AND ADDRESS OF ANY POLITICAL COMMITTEE TO SOLICIT CONTRIBUTIONS FROM SUCH COMMITTEE.

COMMITTEE: NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE - EXPENDITURES

NAME & ADDRESS: PURPOSE OF DISBURSEMENT: DATE AMOUNT
 LAFFALD FOR CONGRESS CO / 04 MEDIA SERVICE 10/08/90 \$62.66
 LA. DRUG MARKLEY
 BOX 10
 FARMINGTON CO 80539
 DISBURSEMENT FOR: GENERAL YTD TOTAL \$4197.11

NAME & ADDRESS: PURPOSE OF DISBURSEMENT: DATE AMOUNT
 BANKER FOR CONGRESS COMMITTEE LA / 06 MEDIA SERVICES 10/17/90 \$23.82
 2525 FLORIDA BLVD.
 PATCH ROUGE, LA 70806
 DISBURSEMENT FOR: GENERAL YTD TOTAL \$23.82

NAME & ADDRESS: PURPOSE OF DISBURSEMENT: DATE AMOUNT
 BANKER FOR CONGRESS COMM. NE / 01 MEDIA SERVICE 10/05/90 \$2.00
 2525 FLORIDA BLVD.
 PATCH ROUGE, LA 70806
 DISBURSEMENT FOR: GENERAL YTD TOTAL \$42.40

NAME & ADDRESS: PURPOSE OF DISBURSEMENT: DATE AMOUNT
 BANKER FOR CONGRESS COMM. OH / 01 MEDIA SERVICE 10/08/90 \$62.66
 4 TIPPIN RD & BANNING
 WAINWATER OH 45239
 DISBURSEMENT FOR: GENERAL YTD TOTAL \$4269.67

NAME & ADDRESS: PURPOSE OF DISBURSEMENT: DATE AMOUNT
 THOMAS GRATTANO NY / 28 MEDIA SERVICE 10/17/90 \$23.82
 13501
 DISBURSEMENT FOR: GENERAL YTD TOTAL \$159.19

NAME & ADDRESS: PURPOSE OF DISBURSEMENT: DATE AMOUNT
 THOMAS GRATTANO NY / 28 MEDIA SERVICE 10/17/90 \$23.82
 13501
 DISBURSEMENT FOR: GENERAL YTD TOTAL \$169.00

NAME & ADDRESS: PURPOSE OF DISBURSEMENT: DATE AMOUNT
 BANKER FOR CONGRESS COMM. IN / 04 MEDIA SERVICES 10/02/90 \$20.00
 13501
 DISBURSEMENT FOR: GENERAL YTD TOTAL \$295.43

SUBTOTAL OF DISBURSEMENTS THIS PAGE \$393.08

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ITEMIZED DISBURSEMENTS
(MEMO ENTRIES)

INFORMATION COPIED FROM SUCH REPORTS OR STATEMENTS MAY NOT BE SOLD OR USED BY ANY PERSON FOR THE PURPOSE OF SOLICITING CONTRIBUTIONS OR FOR COMMERCIAL PURPOSES, OTHER THAN USING THE NAME AND ADDRESS OF ANY POLITICAL COMMITTEE TO SOLICIT CONTRIBUTIONS FROM SUCH COMMITTEE.

NAME OF COMMITTEE: NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE - EXPENDITURES

FULL NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
ELIRAKIS FOR CONGRESS Treas: ANTHONY SANARKOS P.O. BOX 1077 TARPON SPRINGS, FL 34688	FL / 09 VOTER TAPES	11/06/90	\$40.00
DISBURSEMENT FOR: GENERAL			YTD TOTAL \$40.00

FULL NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
KEN BLACKWELL FOR CONGRESS 194 PIPPIN RD @ BANNING CINCINNATI OH 45239	OH / 01 TRACKING	10/22/90	\$396.00
	OH / 01 TRACKING	11/06/90	\$334.33
DISBURSEMENT FOR: GENERAL			YTD TOTAL \$5000.00

FULL NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
FRIENDS OF SHERWOOD BOEHLERT Treas: THOMAS GRAZIANO P.O. BOX C UTICA, NY 13503	NY / 25 MEDIA SERVICES	10/24/90	\$32.72
	NY / 25 MEDIA SERVICES	10/29/90	\$36.00
DISBURSEMENT FOR: GENERAL			YTD TOTAL \$227.91

FULL NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
FRIENDS OF SHERWOOD BOEHLERT Treas: THOMAS GRAZIANO P.O. BOX C UTICA, NY 13503	NY / 25 MEDIA SERVICES	11/09/90	\$18.00
DISBURSEMENT FOR: PRIMARY 1992			YTD TOTAL \$18.00

FULL NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
THE FRIENDS OF CONGRESSMAN JACK BUECHNER 12140 WOODCREST EXEC DR. ST. LOUIS, MO 63141	MO / 02 MEDIA SERVICES	10/30/90	\$10.20
DISBURSEMENT FOR: GENERAL			YTD TOTAL \$179.20

FULL NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
THE DAN BURTON FOR CONGRESS COMMITTEE P.O. BOX 50593 INDIANAPOLIS IN 46250	IN / 06 MEDIA SERVICES	10/22/90	\$3.70
DISBURSEMENT FOR: GENERAL			YTD TOTAL \$299.13

FULL NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
FRIENDS OF CONG. BILL CLINGER Treas: JOHN JARZAB P.O. BOX 631 WARREN, PA 16365	PA / 23 MEDIA SERVICE	10/26/90	\$38.50
	PA / 23 MEDIA SERVICES	11/01/90	\$221.00
	PA / 23 MEDIA SERVICES	11/05/90	\$24.00
DISBURSEMENT FOR: GENERAL			YTD TOTAL \$608.27

SUBTOTAL OF DISBURSEMENTS THIS PAGE \$1154.45

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USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE--		EXPENDITURES	
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 320 FIRST STREET, S.E.		2. FEC IDENTIFICATION NUMBER 0069370	
CITY, STATE and ZIP CODE WASHINGTON, D.C. 20003		3. <input type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).	

4. TYPE OF REPORT

(a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Termination Report

Monthly Report Due On:
 February 20 June 20 October 20
 March 20 July 20 November 20
 April 20 August 20 December 20
 May 20 September 20 January 31

Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____

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

(b) Is this Report an Amendment? YES NO

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>9/1/90</u> through <u>9/30/90</u>		
6. (a) Cash on Hand January 1, 19 <u>90</u>		\$ 13,435.70
(b) Cash on Hand at Beginning of Reporting Period	\$ 2,409.41	
(c) Total Receipts (from Line 18)	\$ 2,233,488.29	\$ 14,005,912.47
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 2,235,897.70	\$ 14,019,348.17
7. Total Disbursements (from Line 28)	\$ 2,205,234.69	\$ 13,988,685.16
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 30,663.01	\$ 30,663.01
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 2,327,023.29	

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

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

NANCY MARSHALL, ASSISTANT TREASURER

Signature of Treasurer

Nancy Marshall

Date

10/19/90

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

FEC FORM 3X

(revised 4/87)

91040843233

UNITED STATES FEDERAL ELECTION COMMISSION
Statement of Receipts and Disbursements
Page 2, FEC FORM 3X

Name of Committee (in full) **National Republican Congressional Committee--** Expenditures Report Covering Period From: **9/1/90** To: **9/30/90**

I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A)	-0-	-0-
(ii) Unitemized	-0-	-0-
(iii) Total of contributions from individuals	-0-	-0-
(b) Political Party Committees	-0-	-0-
(c) Other Political Committees (such as PACs)	-0-	-0-
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	-0-	-0-
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	2,200,000.00	13,811,000.00
13. ALL LOANS RECEIVED	-0-	-0-
14. LOAN REPAYMENTS RECEIVED	-0-	-0-
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	33,482.32	194,406.50
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	5.97	505.97
17. OTHER RECEIPTS (Dividends, Interest, etc.)	-0-	-0-
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	2,233,488.29	14,005,912.47
II. DISBURSEMENTS		
19. OPERATING EXPENDITURES Less Inkind	1,416,889.30	12,559,851.58
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	300,000.00	351,125.00
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES Plus Inkind	172,561.22	522,183.53
22. INDEPENDENT EXPENDITURES (use Schedule E)	-0-	-0-
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F). Plus Inkind	315,784.17	546,275.05
24. LOAN REPAYMENTS MADE	-0-	-0-
25. LOANS MADE	-0-	-0-
26. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees	-0-	9,250.00
(b) Political Party Committees	-0-	-0-
(c) Other Political Committees (such as PACs)	-0-	-0-
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))	-0-	9,250.00
27. OTHER DISBURSEMENTS	-0-	-0-
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	2,205,234.69	13,988,685.16
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))	-0-	-0-
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	-0-	9,250.00
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)	-0-	9,250.00
32. TOTAL OPERATING EXPENDITURES (from Line 19)	1,416,889.30	12,559,851.58
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)	33,482.32	194,406.50
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)	1,383,406.98	12,365,445.08

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11(a)(i)
11(a)(ii)
11(a)(iii)
11(b)
11(c)
11(d)
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26(a)
26(b)
26(c)
26(d)
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34

SCHEDULE F ITEMIZED COORDINATED EXPENDITURES MADE BY
 POLITICAL PARTY COMMITTEE OR DESIGNATED PERSON(S)
 ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
 (2U.S.C. 441A(D))

(TO BE USED ONLY BY POLITICAL COMMITTEES IN THE GENERAL ELECTION)

NAME OF POLITICAL COMMITTEE (IN FULL)
 NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE - EXPENDITURES

THIS COMMITTEE HAS BEEN DESIGNATED TO TO MAKE COORDINATED EXPENDITURES BY THE
 REPUBLICAN NATIONAL COMMITTEE AND/OR THE REPUBLICAN STATE COMMITTEES.

FULL NAME & MAILING ADDRESS OF SUBORDINATE COMMITTEE: N/A

FULL NAME & ADDRESS:	NAME OF FEDERAL CANDIDATE:	DATE	AMOUNT
HOGAN, NOLAN & STITES, INC. 910 PLUM STREET CINCINNATI OH 45202	STATE:OH DISTRICT:01 PURPOSE: MEDIA SERVICES	9/17/90	\$49699.65
AGGREGATE GEN ELECTION EXPENSES FOR KEN BLACKWELL FOR CONGRESS			\$49699.65
FULL NAME & ADDRESS:	NAME OF FEDERAL CANDIDATE:	DATE	AMOUNT
BRADFORD COMMUNICATIONS, INC. 361 10TH AVENUE, NE HICKORY NC 28603	STATE:NC DISTRICT:08 PURPOSE: PRINTING	9/20/90	\$15486.00
AGGREGATE GEN ELECTION EXPENSES FOR TED BLANTON FOR CONGRESS			\$16698.50
FULL NAME & ADDRESS:	NAME OF FEDERAL CANDIDATE:	DATE	AMOUNT
CAMPAIGN TELECOMMUNICATIONS, INCORPORATED 1556 THIRD AVE., #209 NEW YORK NY 10128	STATE:RI DISTRICT:02 PURPOSE: MEDIA SERVICES	9/18/90	\$7110.00
AGGREGATE GEN ELECTION EXPENSES FOR TRUDY COXE FOR CONGRESS			\$7110.00
FULL NAME & ADDRESS:	NAME OF FEDERAL CANDIDATE:	DATE	AMOUNT
ROGER WILLIAMS ADVERTISING INCORPORATED 482 CONGRESS STREET PORTLAND ME 04101	STATE:ME DISTRICT:01 PURPOSE: MEDIA SERVICES	9/20/90	\$20061.00
AGGREGATE GEN ELECTION EXPENSES FOR DAVID EMERY FOR CONGRESS			\$20061.00
FULL NAME & ADDRESS:	NAME OF FEDERAL CANDIDATE:	DATE	AMOUNT
NATIONAL MEDIA, INC. SUITE 200 211 NORTH UNION STREET ALEXANDRIA, VA 22314	STATE:MI DISTRICT:03 PURPOSE: MEDIA SERVICE	9/27/90	\$17980.00
AGGREGATE GEN ELECTION EXPENSES FOR HASKINS FOR CONGRESS			\$17980.00
FULL NAME & ADDRESS:	NAME OF FEDERAL CANDIDATE:	DATE	AMOUNT
CAMPAIGN TELECOMMUNICATIONS, INCORPORATED 1556 THIRD AVE., #209 NEW YORK NY 10128	STATE:IN DISTRICT:04 PURPOSE: MEDIA SERVICE	9/20/90	\$10000.00
AGGREGATE GEN ELECTION EXPENSES FOR RICK HAWKS FOR CONGRESS COMM.			\$10000.00

SUBTOTAL OF EXPENDITURES THIS PAGE \$120336.65

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE--		EXPENDITURES	
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 320 FIRST STREET, S.E.		2. FEC IDENTIFICATION NUMBER 0069370	
CITY, STATE and ZIP CODE WASHINGTON, D.C. 20003		3. <input type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date)	

4. TYPE OF REPORT

(a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Termination Report

Monthly Report Due On:
 February 20 June 20 October 20
 March 20 July 20 November 20
 April 20 August 20 December 20
 May 20 September 20 January 31

Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____

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

(b) Is this Report an Amendment? YES NO

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>10/18/90</u> through <u>11/26/90</u>		
6. (a) Cash on Hand January 1, 19 <u>90</u>		\$ 13,435.70
(b) Cash on Hand at Beginning of Reporting Period	\$ 21,256.95	
(c) Total Receipts (from Line 18)	\$ 3,515,825.60	\$ 19,291,731.09
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 3,537,082.55	\$ 19,305,166.79
7. Total Disbursements (from Line 28)	\$ 3,519,641.93	\$ 19,287,726.17
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 17,440.62	\$ 17,440.62
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ -0-	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 2,197,878.81	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer
NANCY MARSHALL, ASSISTANT TREASURER

Signature of Treasurer: *Nancy Marshall* Date: **2/6/90**

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

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DETAILED SUMMARY PAGE

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

Name of Committee (in full)	Expenditures	Report Covering the Period	
National Republican Congressional Committee--		From: 10/18/90	To: 11/26/90
		COLUMN A	COLUMN B
		Total This Period	Calendar Year-To-Date
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (use Schedule A)		-0-	-0-
(ii) Unitemized		-0-	-0-
(iii) Total of contributions from individuals		-0-	-0-
(b) Political Party Committees		-0-	-0-
(c) Other Political Committees (such as PACs)		-0-	-0-
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))		-0-	-0-
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		3,470,000.00	19,029,000.00
13. ALL LOANS RECEIVED		-0-	-0-
14. LOAN REPAYMENTS RECEIVED		-0-	-0-
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		35,397.06	251,796.58
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		10,428.54	10,934.51
17. OTHER RECEIPTS (Dividends, Interest, etc.)		-0-	-0-
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)		3,515,825.60	19,291,731.09
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES		1,378,265.14	14,774,598.71
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		570,000.00	1,237,125.00
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		156,714.60	782,213.05
22. INDEPENDENT EXPENDITURES (use Schedule E)		-0-	-0-
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)		1,411,312.19	2,480,264.41
24. LOAN REPAYMENTS MADE		-0-	-0-
25. LOANS MADE		-0-	-0-
26. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees		3,350.00	13,525.00
(b) Political Party Committees		-0-	-0-
(c) Other Political Committees (such as PACs)		-0-	-0-
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))		3,350.00	13,525.00
27. OTHER DISBURSEMENTS		-0-	-0-
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)		3,519,641.93	19,287,726.17
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))		-0-	-0-
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))		3,350.00	13,525.00
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)		3,350.00	13,525.00
32. TOTAL OPERATING EXPENDITURES (from Line 19)		1,378,265.14	14,774,598.71
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)		35,397.06	251,796.58
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)		1,342,868.08	14,522,802.13

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SCHEDULE F ITEMIZED COORDINATED EXPENDITURES MADE BY
 POLITICAL PARTY COMMITTEE OR DESIGNATED (S)
 ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
 (2U.S.C. 441A(D))

(TO BE USED ONLY BY POLITICAL COMMITTEES IN THE GENERAL ELECTION)

NAME OF POLITICAL COMMITTEE (IN FULL)
 NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE - EXPENDITURES

THIS COMMITTEE HAS BEEN DESIGNATED TO TO MAKE COORDINATED EXPENDITURES BY THE
 REPUBLICAN NATIONAL COMMITTEE AND/OR THE REPUBLICAN STATE COMMITTEES.

FULL NAME & MAILING ADDRESS OF SUBORDINATE COMMITTEE: N/A

FULL NAME & ADDRESS:	NAME OF FEDERAL CANDIDATE:	DATE	AMOUNT
NATIONAL REPUBLICAN CONG. COMMITTEE-EXPENDITURES 320 FIRST STREET, SE WASHINGTON, DC 20003	STATE:UT DISTRICT:02 PURPOSE: MEDIA SERVICE	10/10/90	\$60.80
AGGREGATE GEN ELECTION EXPENSES FOR GENEVIEVE ATWOOD FOR CONGRESS			\$60.80

FULL NAME & ADDRESS:	NAME OF FEDERAL CANDIDATE:	DATE	AMOUNT
NATIONAL REPUBLICAN CONG. COMMITTEE-EXPENDITURES 320 FIRST STREET, SE WASHINGTON, DC 20003	STATE:NE DISTRICT:03 PURPOSE: MEDIA SERVICE	10/17/90	\$87.00
AGGREGATE GEN ELECTION EXPENSES FOR BARRETT FOR CONGRESS			\$87.00

FULL NAME & ADDRESS:	NAME OF FEDERAL CANDIDATE:	DATE	AMOUNT
NATIONAL REPUBLICAN CONG. COMMITTEE-EXPENDITURES 320 FIRST STREET, SE WASHINGTON, DC 20003	STATE:OH DISTRICT:01 PURPOSE: TRACKING	10/15/90	\$351.00
AGGREGATE GEN ELECTION EXPENSES FOR KEN BLACKWELL FOR CONGRESS			\$50050.65

FULL NAME & ADDRESS:	NAME OF FEDERAL CANDIDATE:	DATE	AMOUNT
NATIONAL REPUBLICAN CONG. COMMITTEE-EXPENDITURES 320 FIRST STREET, SE WASHINGTON, DC 20003	STATE:RI DISTRICT:02 PURPOSE: TRACKING	10/15/90	\$366.00
AGGREGATE GEN ELECTION EXPENSES FOR TRUDY COXE FOR CONGRESS			\$47360.63

FULL NAME & ADDRESS:	NAME OF FEDERAL CANDIDATE:	DATE	AMOUNT
NATIONAL REPUBLICAN CONG. COMMITTEE-EXPENDITURES 320 FIRST STREET, SE WASHINGTON, DC 20003	STATE:IL DISTRICT:11 PURPOSE: TRACKING	10/15/90	\$372.00
AGGREGATE GEN ELECTION EXPENSES FOR WALTER DUDYCZ FOR CONGRESS			\$35706.37

FULL NAME & ADDRESS:	NAME OF FEDERAL CANDIDATE:	DATE	AMOUNT
NATIONAL REPUBLICAN CONG. COMMITTEE-EXPENDITURES 320 FIRST STREET, SE WASHINGTON, DC 20003	STATE:CT DISTRICT:05 PURPOSE: TRACKING	10/15/90	\$366.00
AGGREGATE GEN ELECTION EXPENSES FOR GARY FRANKS FOR CONGRESS			\$26073.40

SUBTOTAL OF EXPENDITURES THIS PAGE \$1602.80

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE---		EXPENDITURES	
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 320 FIRST STREET, S.E.		2. FEC IDENTIFICATION NUMBER 0069370	
CITY, STATE and ZIP CODE WASHINGTON, D.C. 20003		3. <input type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).	

4. TYPE OF REPORT

- (a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Termination Report

Monthly Report Due On:

- February 20 June 20 October 20
 March 20 July 20 November 20
 April 20 August 20 December 20
 May 20 September 20 January 31

- Twelfth day report preceding GENERAL (Type of Election)
 election on 11/6/90 in the State of _____
 Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? YES NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	<u>10/1/90</u> through <u>10/17/90</u>		
6. (a) Cash on Hand January 1, 19 <u>90</u>			\$ 13,435.70
(b) Cash on Hand at Beginning of Reporting Period		\$ 30,663.01	
(c) Total Receipts (from Line 18)		\$ 1,769,993.02	\$ 15,775,905.49
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 1,800,656.03	\$ 15,789,341.19
7. Total Disbursements (from Line 28)		\$ 1,779,399.08	\$ 15,768,084.24
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 21,256.95	\$ 21,256.95
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		\$ -0-	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-378-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)		\$ 2,443,467.83	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer
NANCY MARSHALL, ASSISTANT TREASURER
 Signature of Treasurer

Nancy Marshall

Date
 10/25/90

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

91040843241

DETAILED SUMMARY PAGE

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

Name of Committee (in full)	Report Covering the Period	
EXPENDITURES	From: 10/1/90	To: 10/17/90
NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE	COLUMN A	COLUMN B
	Total This Period	Calendar Year-To-Date
I. RECEIPTS		
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A)	-0-	-0-
(ii) Unitemized	-0-	-0-
(iii) Total of contributions from individuals	-0-	-0-
(b) Political Party Committees	-0-	-0-
(c) Other Political Committees (such as PACs)	-0-	-0-
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	-0-	-0-
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	1,748,000.00	15,559,000.00
13. ALL LOANS RECEIVED	-0-	-0-
14. LOAN REPAYMENTS RECEIVED	-0-	-0-
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	21,993.02	216,399.52
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	505.97
17. OTHER RECEIPTS (Dividends, Interest, etc.)	-0-	-0-
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	1,769,993.02	15,775,905.49
II. DISBURSEMENTS		
19. OPERATING EXPENDITURES	836,481.99	13,396,333.57
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	316,000.00	667,125.00
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	103,314.92	625,498.45
22. INDEPENDENT EXPENDITURES (use Schedule E)	-0-	-0-
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)	522,677.17	1,068,952.22
24. LOAN REPAYMENTS MADE	-0-	-0-
25. LOANS MADE	-0-	-0-
26. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees	925.00	10,175.00
(b) Political Party Committees	-0-	-0-
(c) Other Political Committees (such as PACs)	-0-	-0-
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))	925.00	10,175.00
27. OTHER DISBURSEMENTS	-0-	-0-
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	1,779,399.08	15,768,084.24
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))	-0-	-0-
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	925.00	10,175.00
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)	925.00	10,175.00
32. TOTAL OPERATING EXPENDITURES (from Line 19)	836,481.99	13,396,333.57
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)	21,993.02	216,399.52
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)	814,488.97	13,179,934.05

91040343242

NATIONAL REPUBLICAN
CONGRESSIONAL COMMITTEE

F E C R E P O R T

S C H E D U L E F

L I N E 23M

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SCHEDULE F ITEMIZED COORDINATED EXPENDITURES MADE BY
 POLITICAL PARTY COMMITTEE OR DESIGNATED (S)
 ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
 (2U.S.C. 441A(D))

(TO BE USED ONLY BY POLITICAL COMMITTEES IN THE GENERAL ELECTION)

NAME OF POLITICAL COMMITTEE (IN FULL)
 NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE - EXPENDITURES

THIS COMMITTEE HAS BEEN DESIGNATED TO TO MAKE COORDINATED EXPENDITURES BY THE
 REPUBLICAN NATIONAL COMMITTEE AND/OR THE REPUBLICAN STATE COMMITTEES.

FULL NAME & MAILING ADDRESS OF SUBORDINATE COMMITTEE: N/A

FULL NAME & ADDRESS:	NAME OF FEDERAL CANDIDATE:	DATE	AMOUNT
NATIONAL REPUBLICAN CONG. COMMITTEE-EXPENDITURES 320 FIRST STREET, SE WASHINGTON, DC 20003	STATE:NE DISTRICT:03 PURPOSE: MEDIA SERVICE	10/24/90	\$635.50
	MEDIA SERVICE	10/26/90	\$38.50
AGGREGATE GEN ELECTION EXPENSES FOR BARRETT FOR CONGRESS			\$50280.00

FULL NAME & ADDRESS:	NAME OF FEDERAL CANDIDATE:	DATE	AMOUNT
NATIONAL REPUBLICAN CONG. COMMITTEE-EXPENDITURES 320 FIRST STREET, SE WASHINGTON, DC 20003	STATE:OH DISTRICT:01 PURPOSE: TRACKING	11/06/90	\$55.67
AGGREGATE GEN ELECTION EXPENSES FOR KEN BLACKWELL FOR CONGRESS			\$50106.32

FULL NAME & ADDRESS:	NAME OF FEDERAL CANDIDATE:	DATE	AMOUNT
NATIONAL REPUBLICAN CONG. COMMITTEE-EXPENDITURES 320 FIRST STREET, SE WASHINGTON, DC 20003	STATE:NC DISTRICT:08 PURPOSE: VOTER TAPES	11/06/90	\$106.98
AGGREGATE GEN ELECTION EXPENSES FOR TED BLANTON FOR CONGRESS			\$20651.67

FULL NAME & ADDRESS:	NAME OF FEDERAL CANDIDATE:	DATE	AMOUNT
NATIONAL REPUBLICAN CONG. COMMITTEE-EXPENDITURES 320 FIRST STREET, SE WASHINGTON, DC 20003	STATE:OH DISTRICT:08 PURPOSE: MEDIA SERVICE	10/24/90	\$47.50
	VOTER TAPES	11/06/90	\$40.00
AGGREGATE GEN ELECTION EXPENSES FOR JOHN BOEHNER FOR CONGRESS			\$2587.50

FULL NAME & ADDRESS:	NAME OF FEDERAL CANDIDATE:	DATE	AMOUNT
NATIONAL REPUBLICAN CONG. COMMITTEE-EXPENDITURES 320 FIRST STREET, SE WASHINGTON, DC 20003	STATE:RI DISTRICT:02 PURPOSE: TRACKING	10/22/90	\$366.00
	TRACKING	11/06/90	\$252.14
	VOTER TAPES	11/06/90	\$96.17
AGGREGATE GEN ELECTION EXPENSES FOR TRUDY COXE FOR CONGRESS			\$49242.61

FULL NAME & ADDRESS:	NAME OF FEDERAL CANDIDATE:	DATE	AMOUNT
NATIONAL REPUBLICAN CONG. COMMITTEE-EXPENDITURES 320 FIRST STREET, SE WASHINGTON, DC 20003	STATE:CA DISTRICT:44 PURPOSE: VOTE TAPES	11/06/90	\$385.14
AGGREGATE GEN ELECTION EXPENSES FOR CUNNINGHAM FOR CONGRESS COMM.			\$49655.65

SUBTOTAL OF EXPENDITURES THIS PAGE \$2023.60

91040843245



Ohio
Republican
Party

Robert T. Bennett
Chairman

Martha C. Moore
Vice-Chairman

May 22, 1990

The Honorable Guy Vander Jagt, Chairman
National Republican Congressional Committee
320 First Street, S.E.
Washington, D.C. 20003

Dear Congressman Vander Jagt:

By this letter the Ohio Republican Party authorizes the National Republican Congressional Committee to serve as the agent of the Ohio Republican Party for the purpose of making coordinated expenditures pursuant to 2 U.S.C. 441a (d) (3).

Your Committee is authorized to make these expenditures on behalf of the Ohio Republican Party in connection with the general election campaign of Ken Blackwell in the 1st Congressional District of Ohio.

Under 441a (d) (3) you may spend, on behalf of the Ohio Republican Party, \$25,000 for Ken Blackwell.

Sincerely,

Robert T. Bennett,
State Chairman

91040343246



Republican
National
Committee

Lee Atwater
Chairman

July 11, 1990

The Honorable Guy Vander Jagt, Chairman
National Republican Congressional Committee
320 First Street, SE
Washington, D.C. 20003

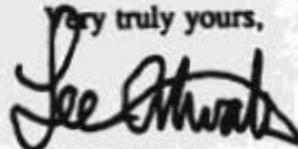
Dear Guy:

By this letter the Republican National Committee authorizes the National Republican Congressional Committee to serve as the agent of the Republican National Committee for the purpose of making expenditures pursuant to 2 U.S.C. Section 441a(d)(3). Your committee is authorized to make these expenditures on behalf of the Republican National Committee in connection with the general election of Ken Blackwell in the First District of Ohio.

Under Section 441a(d)(3) you may spend, on the Republican National Committee's behalf, \$25,000.00 for Ken Blackwell.

Best personal regards.

Very truly yours,



Lee Atwater

LA/acm

cc: Norm Cummings
Mary Matalin
Jay Banning
Ben Ginsberg
Ed Rollins
Jill Hanson
Lauren Carney

91040843247



Republican
National
Committee

February 5, 1991

The Honorable Guy Vander Jagt, Chairman
National Republican Congressional Committee
320 First Street, SE
Washington, D.C. 20003

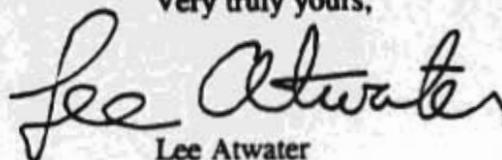
Dear Guy:

By this letter the Republican National Committee authorizes the National Republican Congressional Committee to serve as the agent of the Republican National Committee for the purpose of making expenditures pursuant to 2 U.S.C. Section 441a(d)(3). Your committee is authorized to make these expenditures on behalf of the Republican National Committee in connection with the general election of Ken Blackwell in the First District in Ohio.

Under Section 441a(d)(3) you may spend, on the Republican National Committee's behalf, \$140.00 for Ken Blackwell.

Best personal regards.

Very truly yours,



Lee Atwater
General Chairman

LA/acm

cc: Norm Cummings
Mary Matalin
Jay Banning
Ben Ginsberg
Ed Rollins
Jill Hanson
Lauren Carney

91040843248

9 1 0 4 0 8 4 3 2 4 9

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3218

NAME OF COUNSEL: Jan Witold Baran

ADDRESS: Wiley, Rein & Fielding

1776 K Street, N.W.

Washington, D.C. 20006

TELEPHONE: (202)479-7000

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.

February 7, 1991

Date

Nancy S. Marshall

Signature

RESPONDENT'S NAME: NRCC/Center for Environmental Policy

ADDRESS: 320 First Street, S.E.

Washington, D.C. 20003

HOME PHONE: N.A.

BUSINESS PHONE: (202)479-7020

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066 0265

THOMPSON, HINE AND FLORY

ATTORNEYS AT LAW
SUITE 1400
312 WALNUT STREET
CINCINNATI, OHIO 45202-4029

(513) 352-6700
FAX (513) 341-4771
TELEX 938003

WRITER'S DIRECT
DIAL NUMBER

AKRON, OHIO
BRUSSELS, BELGIUM
CLEVELAND, OHIO
COLUMBUS, OHIO
DAYTON, OHIO
LANDOVER, MARYLAND
PALM BEACH, FLORIDA
WASHINGTON, D.C.

March 4, 1991

(513) 352-6635

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

Re: MUR 3218

Dear Mr. Long:

This is the initial response of the Ohio Republican Party ("ORP") to the Complaint in the above-captioned Matter Under Review, consisting of this letter and three affidavits. The Complaint alleges that the ORP mailed materials ("Mailings") belonging to the Ken Blackwell for Congress Committee ("Blackwell Committee") under the ORP bulk mail permit. The Complaint also contains extraneous materials purporting addressed to the U.S. Postal Service. Finally, it alleges matters regarding the National Republican Congressional Committee.

The Ohio Republican Party is responding solely to the allegations of excess party coordinated expenditures or contributions in kind. We deny them.

The evidence contained in the attached affidavits, with attachments, of John Hurd, Jeffrey Ledbetter, and Vada Hill, establishes conclusively that the Mailings were "non-allocable" expenditures, as described at 2 U.S.C. §§ 431(8)(B)(x), and 431(9)(B)(viii), and 11 C.F.R. §§ 100.7(b)(15) and 100.8(b)(16). These volunteer activities complied with all relevant laws:

1. All statutory and regulatory criteria were observed.
 - a. The materials were distributed by means of volunteer-intensive mailings, using non-commercial lists and organized by campaign and ORP personnel. They were not distributed by mass media or any other prohibited means.
 - b. All costs have been or will be paid from the ORP's reporting federal account, by funds legal under the Federal Election Campaign Act.
 - c. No "earmarked" contributions were used to pay the costs.

91 MAR -6 PM 4: 20

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

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TOMPSON, HINE AND FLORY

Federal Election Commission
March 4, 1991
Page 2

2. The printed materials were bought by the ORP. (See, Affidavits of John Hurd and Jeffrey Ledbetter.)
3. Postage was paid by the ORP (See, Affidavits of J. Hurd and J. Ledbetter.)
4. The Mailings were used in connection with volunteer activities, with volunteers preparing them for mailing to addressees whose names came from voter lists belonging to the Blackwell Committee. (See, Affidavit of Vada Hill)

This Complaint is without merit, but one item merits additional discussion. It is not the fact that the Complaint is baseless. The ORP's plans and activities were not disclosed to the Luken campaign, nor had they any right to them. Consequently, we accept that their apparent lack of familiarity with the FECA's provision for political party activity in Congressional campaigns led them to file this action. It is an unfortunate side effect of political activity.

What we hope the Commission will review very closely, however, is the evidence submitted by Mr. Sylvester, under oath and with two opportunities to file his Complaint.¹ For whatever reason, he has elected to submit a document which appears to have been created for the express purpose of misleading the Commission in its investigation. From the materials we have reviewed and the sworn testimony of Blackwell Committee personnel, we can conclude only that the materials presented to the Commission in Mr. Sylvester's Complaint were altered.

In summary response, activity was entirely legal. Apparently, some vendor debt remains to be paid off, but the expenses are being paid from the federal account, with federal dollars as they are raised in the normal course of the ORP's business. The "volunteer component" was present and is proved by sign-in sheets and photographs. The Mailings were made to voters in the First Congressional District, not distributed by mass media or other prohibited media. The ORP and the Blackwell Committee complied with all relevant laws and regulations.

¹Mr. Sylvester submitted the attached correspondence in October, 1990, in an apparent attempt to file a Complaint. That document failed to meet the statutory requirements for a Complaint and was returned to him.

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THOMPSON, HINE AND FLORY

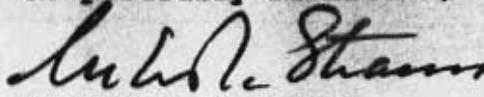
Federal Election Commission

March 4, 1991

Page 3

If you have any further questions, please contact me. Thank you very much for your assistance in this matter.

Respectfully submitted,



GORDON M. STRAUSS

GMS22.GMS

Enclosures

91040843253

BEFORE THE
FEDERAL ELECTION COMMISSION
999 E. Street, NW
Washington, D.C. 20463

Paul Sylvester :
vs. : MUR 3218
Ken Blackwell for Congress Committee :

DISTRICT OF COLUMBIA :
: S.S.
CITY OF WASHINGTON :

AFFIDAVIT OF VADA HILL

VADA HILL, being first duly cautioned and sworn, states for his affidavit as follows:

1. I was Assistant Campaign Manager for the Ken Blackwell for Congress Committee ("Blackwell Committee.") In that capacity, I was responsible for obtaining volunteers and overseeing their efforts in the campaign. One of the functions I oversaw was the "volunteer component" of the Ohio Republican Party's ("ORP") mailings of campaign materials ("Mailings") under the "non-allocable expenditure" portions of federal campaign laws, as I understood them, though I am not an attorney.

2. The pieces reproduced by Complainant in his Complaint, with one significant and disturbing exception, were such non-allocable mailings. They were done by Blackwell Committee volunteers for the ORP. The ORP, on my information and belief, paid or is responsible for paying the expenses.

3. Attached hereto as Exhibits A-1, B-1 and C-1 are originals of the pieces reproduced in the Complaint, with proof of the volunteer components for each (See, sign-in sheets, Exhibits A-2, B-2 and C-2; photographs, Exhibits A-3, B-3 and C-3).

4. The piece actually mailed to voters in the First District appears in this Affidavit as Exhibit A (hereafter "Album Brochure.") It was prepared at the ORP's expense and contained the ORP's disclaimer. This piece was an edited version of material previously prepared by the Blackwell Committee. (Please refer to the final page of Exhibit A, and the final page of the first version reproduced in the Complaint, to see differences in the ORP's edited version. Then compare each of these to the hybrid version reproduced as what the ORP allegedly mailed.)

91040343254

5. If the photocopies contained in the copy of the Complaint which I have viewed are accurate representations of what Complainant submitted, Complainant's reproduction of the Album Brochure misrepresents the facts. For some reason, Complainant has seen fit to reproduce the earlier version of the Album Brochure, and attach an incomplete copy of the actual address page from the ORP version as his example of what the ORP mailed. Complainant's copy, as received from the Commission, has no disclaimer on it, apparently having been cut off in the copying process. (Please note that the bottom of the page containing the label addressed to Catherine Mangino contains no disclaimer, whereas Exhibit A clearly contains the ORP disclaimer.)

6. On my information and belief, it would be necessary to reproduce the final pages of two separate documents in order to create the document which Complainant presented to the Commission under oath. On my further information and belief, this manner of reproducing the Album Brochure required the copier to possess a copy of each version, and could not have been done inadvertently. In any case, Complainant has thereby created the false impression that the ORP mailed brochures containing the Blackwell Committee's disclaimer.

7. On my information and belief, the Mailings were prepared at the ORP's cost. The pieces were delivered to the Blackwell Committee's headquarters already printed and addressed, at ORP's cost. The lists of addressees were purchased from the ORP, at its cost to reproduce them on my information and belief. On my further information and belief, they were compiled from voter lists available to any person from the Hamilton County Board of Elections. They were not purchased from any commercial mail order house or other commercial firm, and they were property of the Blackwell Committee.

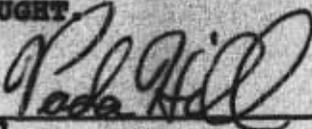
8. At Blackwell Committee headquarters, volunteers (see sign-in sheets, Exhibits A-2, B-2 and C-2) opened the cartons and stamped on each piece, individually, the return address and the bulk mail permit indicia. Then they sorted the pieces into the requisite postal/zip code categories and transported the Mailings to the Postal Service, where they were mailed. (See, photographs, Exhibits A-3, B-3 and C-3) On my information and belief, the postage costs were paid by the ORP.

9. All non-allocable activities over which I had authority were conducted to the best of my knowledge, information, and belief in accordance with all federal rules and regulations as I understood them.

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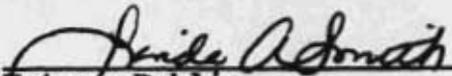
Hill Affidavit
March 5, 1991
Page 3

FURTHER THE AFFIANT SAITH NAUGHT.



Vada Hill

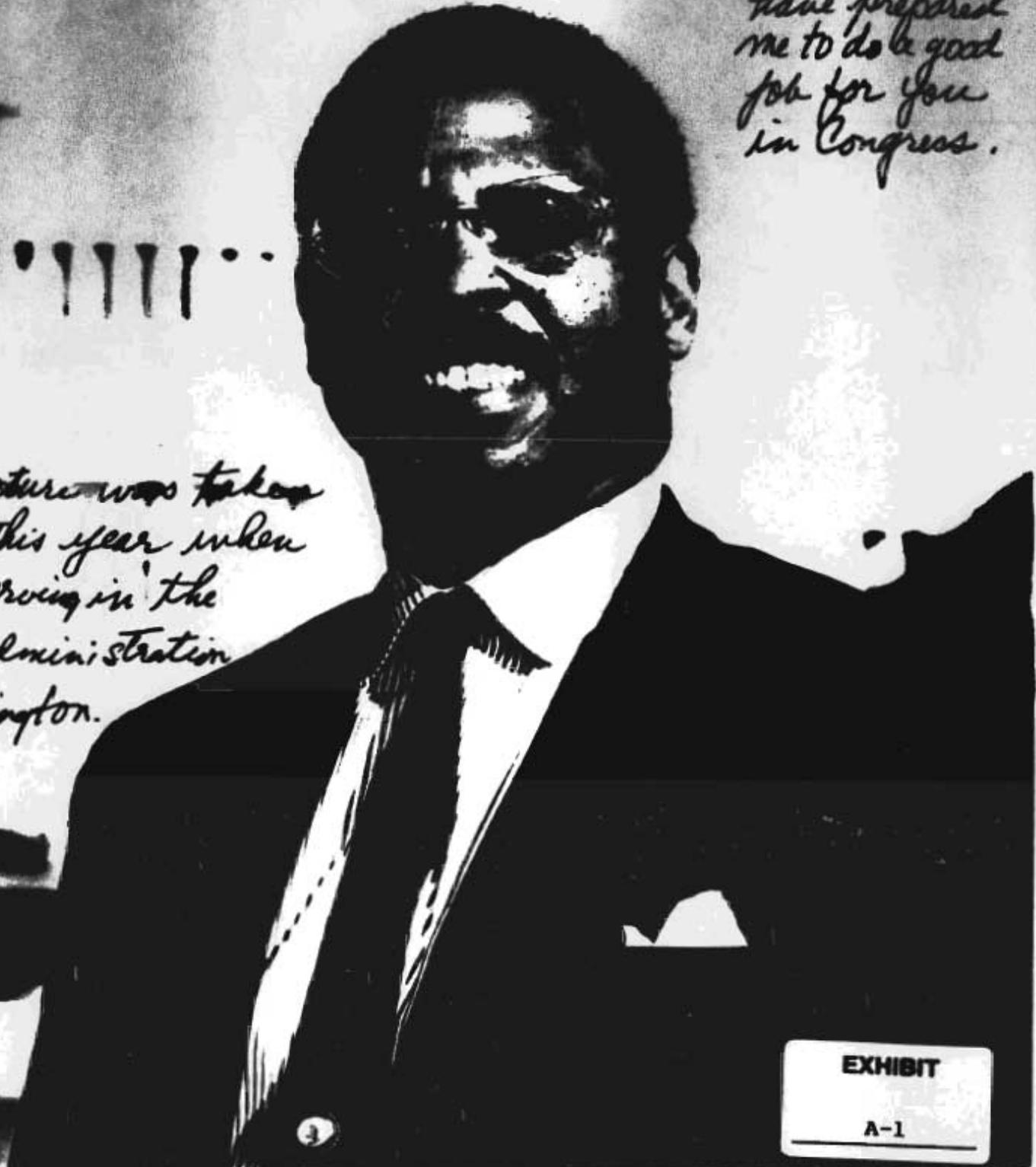
Before me, a Notary Public in and for the said city and district, came Vada Hill, who, being duly cautioned and sworn, made this affidavit on this 5th day of March, 1991.



Notary Public
My Commission expires My Commission Expires Sept. 14, 1997

91040343256

Hello. I'm Ken Bucknell. I'm the Republican candidate for Congress in the First District. I've pulled together some pictures taken over the years to introduce you to me and my family. They also show some of the experiences that I think have prepared me to do a good job for you in Congress.



This picture was taken earlier this year when I was serving in the Bush administration in Washington.

43257

EXHIBIT
A-1



When my father came home from World War II Army service, the only housing available was in public projects. The picture at right is my Dad in uniform. On the left is my Dad playing ball with me when I was two. My parents gave me more than a baseball uniform in the projects. They gave me a belief that with education and hard work, I could make something of my life.

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Rosa and me before the Hughes High School Senior Prom.



We were married two years later.

Graduated from Xavier in 1970. The Dallas Cowboys signed me, but their coaches agreed with the recruits that I belonged back in school! Received my Masters in Education a year later.



1983
259

My first run for Cincinnati City Council. Every minute spent campaigning counted, because I won by only about 500 votes.

My first job out of school was teaching at Merry Junior High. After that I taught for several years at Xavier University, I still love teaching.



← That's my wife Rosa.



The two most important women in my life, my mother and my wife Rosa.

Only in America! From a public housing project
to Mayor of Cincinnati in three decades. I didn't
spend much time behind that desk. I felt the
Mayor's job was to be out in the community, providing
leadership in making Cincinnati a better and
safer place to live and bring up our children.



President Reagan
reminded me that
he too is a Republican
by choice, and he
welcomed me into the
Party.

Jack Kemp, my boss ● HUD this past year. Jack gives me a lot of the credit for shaping the Project Hope proposal to make homeownership possible for people of all income levels and cut federal spending at the same time.



Secretary of The Treasury Nicholas Brady. We've spoken several times about ways to contain federal spending and reduce the deficit.



Talking with the President about First District issues after he recruited me earlier this year to run for Congress.

843261

9104



My most recent
teaching job was at
the School of Government
at Harvard University,
as a Fellow of the
Institute of Politics.

These are some of the young people
we are trying to reach with the
Cincinnati Youth Collaborative, the
public-private initiative I co-
founded to keep students in school
through graduation, and also
through the Catholic Inner City
School Education Fund which I
chaired. Education was the key
to a productive life for me. It's
their best hope too!



Chairing the Finance Committee was in some
ways my most important job on Cincinnati City
Council. Opened the budget process to the
community. Called back all the laid-off
police and firefighters with no new
taxes.

9104



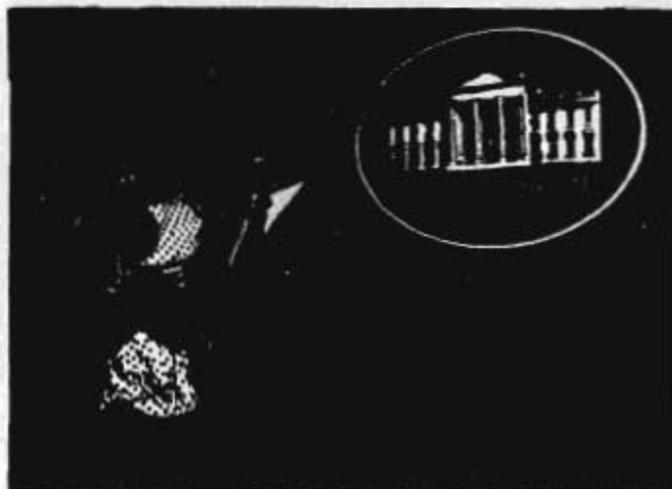
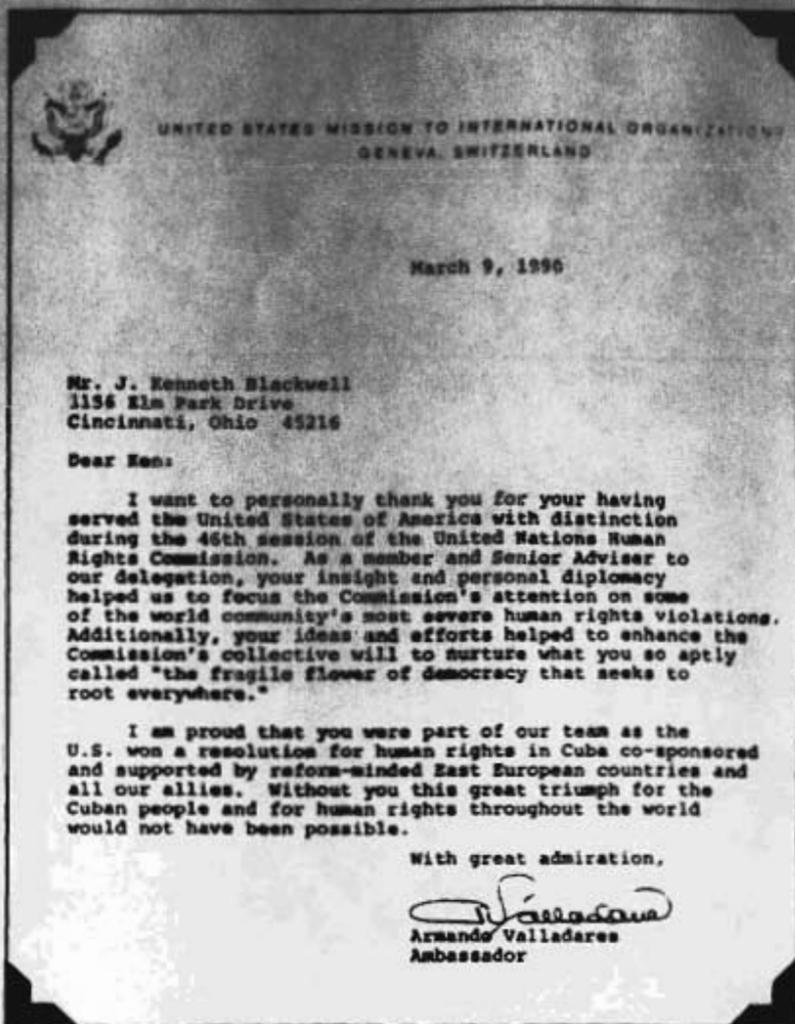
My wife Rosa now I'm very proud
she's the principal of our
elementary school, Hughes.



I was the Senior Advisor of Ambassador Armando Valladares at the 46th Session of the UN Human Rights Commission in Geneva, Switzerland and I was very gratified by the letter he wrote about my role in securing the first condemnation of Cuban violations ever passed by this body.



Below with Enrique Bermudez, the leader of the Nicaraguan Freedom Fighters since this was taken in 1988, free elections was thrown out the communist Sandinista regime I've been going to Central America since 1981 in hopes of helping to produce triumphs for democracy like this one.



With our youngest, Kristen at the White House.



My wife, Rosa and our three children
Jim, Lisa, Dawn and Kristin at the first
actual home we bought 12 years ago.
Thanks to looking through this get-
acquainted album to you know my
background and positions during
the campaign. I hope you'll decide
that I'm the right person to represent you and your family in Congress.

Sincerely, Ken Blackwell

2104034

Sign In Please!

NAME	ADDRESS & PHONE	ACTIVITY
Louise Muehlenhard	9728 71st St. ⁸²⁵ 5263	Brochure Stamp
Kurt Muehlenhard	9798 Manhattan Pk ⁸²⁵ 5543	"
Wesley Tref	9772 ⁵²⁵ 7215	"
Finney Tref	9772 ⁸²⁵ 7215	"
William Orr	1095 Albany Terrace ⁶⁸¹ 2032	"
Theresa Muehlenhard	9786 Manhattan Pk. 45251 ⁸²⁵ 2132	"
Joan Thomas	8256 Midford St 45233 922-2727	"
Margaret Child	4037 Gaddal Rd 45229 281-777	"
Anne Cooper	1153 Vienna Ave	Brochure
Kenneth Head	4881 Reading Rd	Stamping
Lisa Friedman	1013 St Gregory 579-8533	
Mary Russell	2499 Blueback Dr 729-0685	
Mary Ferguson	6750 Chrysanthea Dr 791-8078	Brochure Stamping
Mary Alice Baughman	33 Buxton Woods Lane	Brochure stamping
Paula M. Kennedy	2160 Crane Ave 281-1815	Stamping
Grace Diamond	563 Grandin Av. ^{Sp. 825} 7249	Brochure Stamp
Ann Brubaker	5782 Belmont Ave. 591-1034	Stamping
Ray	6373 Asplen Way 881-8620	Stamping
Andy	8623 Willowmeir CT 385-2544	mail
Bro. Joe	2708 Johnstone Pl 961-6244	Stamping
Evelyn McCullough	7714 Compton Lake Dr 522-2055	

EXHIBIT
BY _____
A-2

Sign In Please!

NAME	ADDRESS & PHONE	ACTIVITY
Pearl Blackwell Lewis	11375 Fremont Ave 825-6283	Stamping Brochure
Orlyna Achenon	3480 Jessup Rd	Whiter!
Virginia Ford	6426 Orleans Ct.	Brochure Stamp
Florida Moses	5112 North Bond Rd 661-0718	Stamping
Mary Schibe	12091 Hermitage Court 851-5909	Stamping
Annet M. Gange	2109 Harrison Ave 462-5714	J
Wilbur D. Jones	3965 Ardmore 861-4125	Stamping
BRIAN KNAB	5990 Day Rd.	Stamping
Andy Davis	4421 FLAMINGO LN 522-4726	Stamping
Ben Lighthall	5058 Jessup Rd 803-3809	Stamping
Mordanting Law	10639 Pottinger 951-4919	Stamping
Nancy Vek	1704 Cedar 681-6393	Brochure
Robert J. Vek	1704 Cedar 681-6393	Brochure
Joe Stangton	2801 Queen City 541-4665	Stamping Brochure
Deborah Manning	506 Viningwood Dr. 981-9112	mailing
Penny Guffly	8642 Ocosta (11) 661-0986	mailing
Jane Kay	3264 Delomar 741-9221	mailing
Rita Lee	6542 Quin Lane 867-9504	Stamping Brochure
Wren Ferguson	2508 Harrison 525-3034	Stamping Brochure
James Garvin	5554 Vera Ave 731-1060	Stamping Brochure
John L. Cox	2610 Monette Ct 931-1405	Stamping Brochure

BY _____

Sign In Please!

NAME	ADDRESS & PHONE	ACTIVITY
Lisa Knight	3424 Tuxedo 661-2588	Brochure
Salim Hammad	2637 Royal Glen	
Gudy Stamp	11663 Hollingsworth 825-7789	Stamping
Richard Stamp	11663 Hollingsworth 825-7799	" "
Bruce W. Turner	39617 Arlington 961-0290	Stamping
Sharon Cleary	1850 Miles Rd 825-4751	Book Stamping
James A. Stone	4714 Hubbs Pk 395-2040	Stamping
Bobby Jones Sunday	5725 Avalak Pl- 385-625	Stamping
Tom Rulli	5733 Babygdd 385-1673	Stamping
Mike P. Jones	2527 Royal Glen 521-6064	Stamping
Lynne Stone	4714 Hubbs 385-2040	Stamping
Sayid A. Khan	2850 Geraldine Dr. C1071 OH	Stamping
Ray Powell	1239 Neab Rd Lmtr OH	Stamping

BY _____

Sign In Please!

NAME	ADDRESS & PHONE	ACTIVITY
Carol [unclear]	7153 Kiowa Ave 081-45762	Brochure Mail
Alma Hackes	9075 Cherry blossom Ln	Brochure stamping
Arlene [unclear]	4714 Nubble Rd 1:30 3:20	" "
Mary Ann	3374 Pades of	Brochure Mail
Paul [unclear]	3970 Hawley Rd	Stamping Brochure Mail
Nora [unclear]	6573 Delaware Rd	Stamping Brochure Mail
Janet [unclear]	3264 [unclear] Ln	Brochure Mail
Debra Ellsori	3041 [unclear] Ave	" "
Judy McMahon	3448 [unclear] Ln	Brochure Mail
Curtis McKenney Jr	2160 Crane Ave 281-1813	Brochure Mail
Martha Henry	1226 Bates Ave 41225 591-0340	" "
Bryce Choquette Sr	5708 [unclear] Rd 961-1254	Stamping
Judith Muller	7409 South Pointe Dr 54253	Stamping 941-0261
Ann [unclear]	2033 Weyer Ave 7510130	BROCHURE STAMPS 731-0130
Holly Kaula	5990 West Rd 988-0574	Brochure stamping
Angie Lebel	5174 SOUTH RD 741-3785	Brochure stamping
Jan [unclear]	963 BODA AVE 661-1898	BROCHURE STAM
Mark [unclear]	2659 Popinger Rd 951-4919	Brochure stamping
Patricia [unclear]	5809 [unclear] #4 5413500	BROCHURE stamping
Harold [unclear]	10302 Peachtree Ln 907-8500	Stamping
TEERI WEBER	2028 NORTH BOND 45239	BROCHURE STAMPING

BY _____

Sign In Please!

NAME	ADDRESS & PHONE	ACTIVITY
Ann Cooper	1153 Vienna Ave 681-4542	Brochure Stamping
Frank Galt	9776 Manhattan 825-7215	Brochure Stamping
Conita McHenry	2160 Casadore 281-1813	Stamp
John Thomas	5656 Midforest 922-2727	"
Regie Hunt	4821 Reading Pl 242-4034	"
Mary Gliche	12091 Frontstone 851-5309	"
Roy Kling	1373 Aspen Way 681-8620	"
Letta Jones	5596 Sidney 922-9424	"
Don Jones	5596 Sidney 922-9424	"
Thonda Mason	5172 North Bend 661-0718	"
Duke Atkins	328 Sussex Ave 821-2585	"
Mary Ann	3374 Rodas Ct. 481-3841	"
Robert Thompson	2057 N Bond Rd 681-1755	
LARRY ROWE	5160 Brasus Ave 984-7112	
Bobbe	2708 Johnstonell 961-6294	
Angela M. Lange	2109 Harrison Ave #14 662-5971	
Judy M. M...	2448 Ringwood Dr 741-7773	"

BY _____

91040843270



EXHIBIT

A-3

9 1 0 4 0 8 4 3 2 7 1



91040843272



91040843273



9 1 0 4 0 8 4 3 2 7 4



Charlie Luken's Record on Taxes:

SUPPORTED CELESTE 80% TAX INCREASE
Charlie Luken was against repealing one of the largest state tax increases in Ohio history. This increase is still costing a typical First District family over \$400 each year.

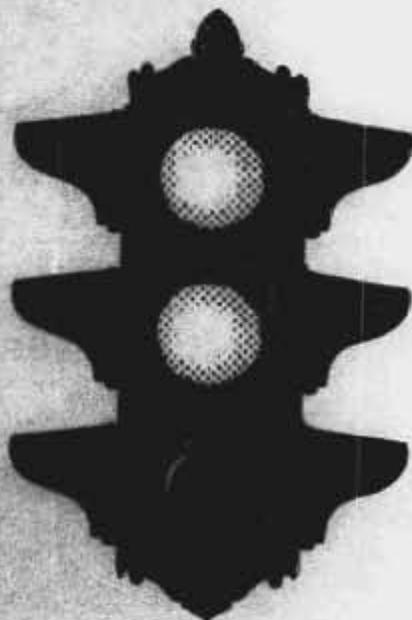
SUPPORTED 15% EARNINGS TAX INCREASE
Charlie voted for a 15% increase in Cincinnati's earnings tax.

SUPPORTED 15% WATER RATE INCREASE

OPPOSED EFFORT TO MAKE IT HARDER FOR THE STATE GOVERNMENT TO RAISE TAXES
Charlie Luken opposed requiring that any future state tax increase be approved by 60% of Ohio state legislators (instead of a simple majority).

With his record
on taxes, what do
you suppose
Charlie Luken
would do as a
member of the
Tax-and-Spend
Majority in
Washington?

GO



Vote for
Ken Blackwell
for Congress...you
know where he
stands.

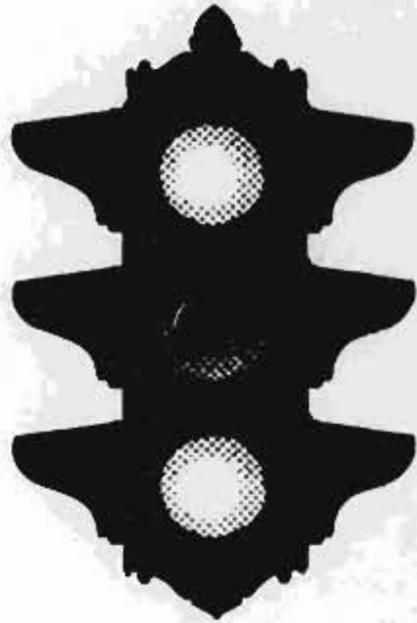


BLACKWELL
• CONGRESS

9 1 0 4 0 8 4 3 2 7 5

9 1 0 4 0 8 4 3 2 7 6

CAUTION



**Please be sure to read
Charlie Luken's record
on taxes.**

Printed by the Ohio Republican Party

DEWEY, JOSEPH
1512 BARKLEY WALKER ST
CINCINNATI OH 45214

OSR-RT 82011

as CR 70

Ohio Republican Party
172 E. State Street
Columbus, Ohio 43215

STOP.



**Think for a moment
about the way taxes hit
your family's budget...**

Sign

NAME	ADDRESS & PHONE	ACTIVITY
Elise Strait	119 Rock Ave Weymouth MA 01985	Stamping
Bob & Chiquette, Sr.	2768 Johnstone Pl. 45206	"
Bob & B. Sherry	6622 Daly Road Cinti. 45224	"
Don Farnell	5596 Seidway Cinti 45238	"
Kate Farnell	5596 Seidway Cinti 45238	"
Jack Breadon	2808 Sterrett Cinti. 45204	"
Cheryl Cooper	1153 Vienna Ave. Cinti 45-2224	BROCHURE stamping
Robert Thompson	2057 N. Grand Rd	MAIL stamping
John Stemon	5656 Midforest 922-2727	"
Pat Mason	2975 Lecker 662-5473	"
Helma R Miller	4007 Dew Ave 574-4842	"
Charlotte Hunter	1587 Lenoxtree Dr 857-5214	mailing
VA BROWN	1169 Vienna 542-9082	mailing-stamping
Jane Flannery	9681 Long Lyle Dr 857-5485	Stamping
Janet Kay Sep.	3264 Delaware 741-9021	Stamping
W T MARTIN	331 Ardour Lake 761-1974	Stamping
Judy McMahon	3448 Kensington Dr 741-7773	Stamping
John S. Deaton	5662 Rapid Run #8 922-6800	Stamping
Loise Muehlenhard	9798 Manhattan 825-5363	Stamping
Bob Muehlenhard	9798 Manhattan 825-5363	Stamping
Melva Donovan	4124 Newtown Northern 574-8881	Stamping

BY _____



Sign

NAME	ADDRESS & PHONE	ACTIVITY
Joyce Krause	715 Evangeline Rd 45240	Stamping
Pauline Pugh	815 Eastman Ave 45240	Stamping
James Bruckmann	5782 Belmont Avenue 45224 5911034	Stamping
Alva Goodner	3460 Davis Ln 45237 531-244	Stamping
Mary Wolf	7912 Stillwell LL Rd 948-1716	Stamping
Mary C. Royal	1728 Rose St 45217 381-6225 051-5977	Stamping
Wanda J. Anderson	248 Gilman Ave 45219	Stamping
W. F. FREY	9310 HARRISON AVE 553-2528	STAMPING
Jill Flannery	9681 LORALINDA DR	Stamping
Bennett Cooper	1153 WICORA AVE,	Stamping
Luticia Davis	4880 Winton Rd #4 45232	Stamping
Harold E. Mains	10308 Peachtree Ln. 45242	Stamping
Paul James Crawford	2356 Auburn Ave #2 45219	Stamping
Christine Davis	529 Rockdale Dr 45239	Stamping
Rex & Blackwell	532 Rockdale Ave 45229	Stamping
Lennie Mager	165 Woodport 45220	Stamping
Jerry Mager	555 Cliff Dr. N.B. 45052	Stamping
Ray B. Mager	6159 Francis Ave 45224	Stamping
Bobbie B. Mager	2819 McKenley Ave 45211	Stamping
Bernie Dempertini	2732 McKenley Ave 45211	Stamping
James Mager	2354 Vera Ave	Stamping

BY _____

Sign

NAME	ADDRESS & PHONE	ACTIVITY
RICHARD DUNANT	3420 PAPE 45208 (OH 6593)	STAMPING
Dudley McMeigh	511 Virgil Rd 45238 2570599	
TRACY ANTEZAN	9811 LEACREST RD 45215 (971-7877)	
Josh Vickers	3937 Chase 45211-574-9829	Anything
Said a know	2850 Conaldrine Dr Cincinnati 45239	
MARC J. SCANLON	484 COACHMAN CT 45238 ⁴⁵¹ 8128	ANYTHING
Robert Thompson	205? N. Paul 194 681-1755	MAIL SIGNS
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BY _____

9/26/80

Sign

NAME	ADDRESS & PHONE	ACTIVITY
Conrad Cooper	1153 WOODRIDGE AVE / 681-4526	Stamping
Wendy Lindsley	1916 Goodman Ave.	"
Don Farrell	5596 Sidney Rd	"
Kate Farrell	5596 Sidney Rd	"
Mary Ann	3374 Ropes Del.	"
John Thomas	5656 Midforest 922-2727	
B. J. Choquette	M. 2708 Johnson Ave, 961-6244	"
Frank Diamond	563 Grandin St, 45246	"
Wendell W. Hul	4821 Kendra Rd 45235	"
Joe M. Blair	1169 Wilcox Ave 45224	"
Don H.	1714 Dallas Ave 45231	"
John C. Scamler	5662 Rapid Run Rd #5 Rt. 011 922-6800	"
Pearl Blackwell	11373 Fremont Dr 820-6283	"
ROSENA L. PORTER	3336 TRIMBLE 45207	
Judy McMahon	3448 Ringwood Dr 45239	"
Mary L. Ferguson	6750 Elwyn Dr 711-8098 45236	"
Yvonne Boyd	2095 Halliwell Rd.	"
Samantha Sakas	4517 Vine St.	"
Paul & Margaret	9613 CRESTBROOK DR 45231 931-0563	"
Jennifer Mysonline	255 Cliff Rd 45052	Stamping
Scott Morris	878 Fenwick Rd 45230	Stamping

BY _____

Sign

NAME	ADDRESS & PHONE	ACTIVITY
Mary Carr	3374 Rodeo	
John Herman	5656 Midforest	
Charlotte Hunter	1587 Lexington	mailing
Debi Moore	878 Rock Lake	
Patricia Ferguson	2067 N. Sand Rd.	mail
Peggie Head		DELIVERY
Carolyn Ackerman	3480 Jessing Rd	MAILING
Ann M Day	5137 Sumner Ave.	
Elmer Bartel	8248 Woodbine Ave	
Lynne Bartel	"	
John Scanlon	5762 Rippled Run Rd. # 8 5296	MAILING
Peter McCoy	6541 Teakwood Ct.	MAILING
Scott Atkinson	53 Bluegrass 41075	photographed
Mary Ferguson	6750 Chrymme Dr 791-8098	folding & stuffing
Emil Rickey	7756 Concord Hill 984-6436	
Jay Flannery	9681 Lorahinda Dr	851-5485
Jane Flannery	" " "	" " "
Debbie Dillon	117 E Collins Oxford Oh 523-9230	
Paula Smith-Goodson	" " "	
Julie Bickel	" " "	
Katie Dillon	252 Emerson Oxford Oh 529-3589	

Sign

NAME	ADDRESS & PHONE	ACTIVITY
<i>Jane Fleming</i>	7681 Lorinda Dr 850-5485	Stamping
<i>Nolan C. Scanton</i>	5662 Rapid Run Rd 45298 422-6500 422-3089	Stamping
<i>Mary L Ferguson</i>	6750 Clarysme Dr 791-8198	"
<i>Ernie Buckley</i>	7756 Concord Hills 984-6436	"
<i>Mary Truog</i>	266 Greenwell Pl 922-4239	
WT MARTIN	331 Arden Lane 761-2872 45215	Mailing
<i>Joel Anderson</i>	830 Redmill Dr. (2445)	"
<i>Arthur Rachmel</i>	8553 Pringle Dr. 521-6457	Mailing
<i>Jon Fryer</i>	9310 Harrison Ave 555-2528	Mailing
<i>Cherie Frazier</i>	165 Maple Ave 961-1150	Mailing
<i>Edna Thompson</i>	2057 St. Bernard Rd	LI
<i>Stans Elin</i>	3040 Junette Ave	"
<i>Paul Truesdell</i>	9613 CRESTBROOK 931 1122 1122	
<i>JAY FLANNERY</i>	9681 Lorinda Dr.	Stamping
<i>Andy Demopolis</i>	6576 Springdale Rd	Trucking
<i>Troy Grant</i>	959 Emerytrail 931-8891	
JAMES GARIN	2354 Vega Ave	whatever
James Bruckmann	5782 Belmont Avenue	Whatever

91040843283



EXHIBIT
B-3

What I Did On My Summer Vacation

I worked with my Dad all summer. He is running for Congress. We worked so hard every day. We went so many places and met a lot of people. They were very nice to us. I really liked going to all the festivals and parades. I made a lot of new friends. I had so much fun working with my Dad.

Kristin
Blackwell

Ohio Republican Party
172 E. State Street
Columbus, OH 43215

91040343284

EXHIBIT

C-1

"The choice is clear. The First District, the nation and my administration need Ken Blackwell in Congress."
— President George Bush

Ken Blackwell's record, a decade of effort on behalf of families.

- Led effort to defeat school based "sex clinics" in Cincinnati schools. October, 1986.
- Led effort to ban sexually explicit cable programming. May, 1983.
- Supported legislation to make it illegal for parents to allow minors to consume alcohol or illicit drugs. May-June, 1986.
- Led effort to prohibit display of sexually explicit magazines to juveniles. February, 1984.
- Led effort to disclaim city support of the "Sister Mary Ignatius Explains It All for You" theatrical production, condemned as offensive and insulting to Catholics by Archbishop Pilarczyk. September, 1984.
- Led effort to proclaim January 22 as Right-to-Life Day in Cincinnati. January, 1984.
- Introduced legislation requiring the notification of parents of minors seeking abortions. 1980.

KEN BLACKWELL

leading the way
to protect
American values
and preserve
family values



I support the Blackwell for a very specific reason - for education to all American children.
The Harrison Family - Highland



If I voted for Mr. Blackwell, my children may have less. I would not want to see them.
The Lopez Family - White



Ken Blackwell is right when he says parents should have the right to choose when to send their children to school. We support education to school and we support Ken Blackwell.
The Balle Family - White Oak



I love Ken. He's the Blackwell of the Play Channel. He's the one all of us, especially our children, already see on TV.
The Butler Family - Highland



Because of you, we did not have to worry about what happens when other families are in the line of someone else's children.
The Galt Family - Highland



It is so glad that Ken had the guts to lead the fight against playing off price gougers and forcing the new "right".
The Lopez Family - White Hill



This is me
Kristen

My wife Rosa and our three children at our first district home. We'd been married three years when we bought this home in 1971. Our oldest child Kimberly is going into her junior year at Syracuse University. Our son Rakeshaan is a junior at Walnut Hills High School. Our youngest, Kristen, is in the fourth grade. I hope to have an opportunity to meet you and your family, sometime soon.

Sincerely, Ken

Blackwell for Congress

91040843285

Date 10/8/91

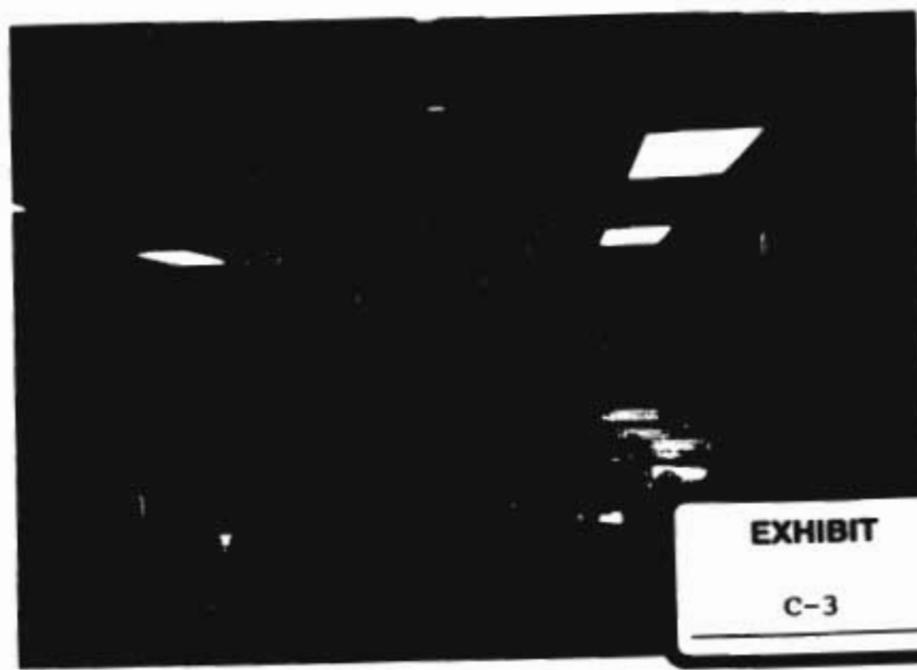
Sign

NAME	ADDRESS & PHONE	ACTIVITY
John Starnes	556 N. West 922-2727	Addressing/STUFFING
Bill Hambleton	3694 HAYLER RD. 385-3133	"
Cindy Buchler	8623 Willowview Ct. 385-2594	"
Mary Ann	3374 Rodeo 481-3841	"
Ann	3374 Rodeo CT 481-3841	"
Piro. Lee	2701 ... 961-6244	"
Andrew Thompson	2057 N. Bond Rd	MAIL
Norm L. Eubank	4494 Running Fawn Dr. 574-4762	addressing /stuffing
Rebecca BROWNING	8161 W. West Rd ^{Circle} OH 385-8328	addressing /stuffing
Rosemary Reif	613-6523	"
BRIAN KAIB	5990 Day Rd 385-8112	"
Ben Lightwell	5058 Jessup Rd. 913-3909	"
Chad Allen	6680 W. Farm Acres 531-6112	Stamping
James Bowley	4660 Rapid Run #12 244-6219	
Jan Felt	9310 HARRISON AVE 953-2528	
Betty Jane Souders	5725 Dunlap, 385-6125	mailing

BY _____

EXHIBIT
 C-2

91040843288



EXHIBIT

C-3

91040843289



91040843290



BEFORE THE
FEDERAL ELECTION COMMISSION
999 E. Street, NW
Washington, D.C. 20463

Paul Sylvester :
vs. : MUR 3218
Ken Blackwell for Congress Committee :

STATE OF OHIO :
: S.S.
COUNTY OF FRANKLIN :

AFFIDAVIT OF JOHN HURD

JOHN HURD, being first duly cautioned and sworn, states for his affidavit as follows:

1. I am Director of Computer Service for the Ohio Republican Party ("ORP"), and have held that position at all times relevant to the Complaint. One of my responsibilities in that capacity is to oversee the mailing of non-allocable campaign materials for state and federal candidates. This included responsibility for the pieces reproduced, (or allegedly reproduced) in the Complaint.

2. I have read and reviewed the Affidavit of Vada Hill ("Hill Affidavit") in this Matter Under Review. In addition to ongoing representations by personnel of the Ken Blackwell for Congress Committee, I have relied specifically on the statements contained in the Hill Affidavit for my belief that the requisite "volunteer components" of these non-allocable mailings were observed. For this reason, I have included copies of them as Exhibits in my Affidavit, and have attempted wherever possible to conform the designation of my Exhibits to those contained in the Hill Affidavit for the convenience of the Commission.

3. On my information and belief, the ORP mailed only those items reproduced in Exhibits A-1, B-1 and C-1 of this Affidavit.

3. Each piece actually mailed by the ORP under its bulk mailing permit (Exhibit A-1, hereafter called "Album Brochure"; Exhibit B-1; Exhibit C-1; collectively called "Mailings") consisted of materials purchased by the ORP and mailed at ORP expense. (See, printer's and other bills for the preparation of the mailings, Exhibits A-4, B-4 and C-4; postage receipts, Exhibits A-5, B-5 and C-5; Exhibit D, general invoices for address/bulk mail stamps and lists, for printing lists at ORP expense.)

91040343291

Hurd Affidavit
March 4, 1991
Page 2

FURTHER THE AFFIANT SAITH NAUGHT.

John Hurd
John Hurd

Before me, a Notary Public in and for the said county and state, came John Hurd, who, being duly cautioned and sworn, made this affidavit.

Michael Stearn 3-5-91
Notary Public *has no expiration date*
My Commission ~~expires~~ *has no expiration date*
Ohio Rev. Code § 147.03

GMS19.GMS
3/4/91

91040343292

Hello. I'm Ken [unclear]
Republican candidate for Congress in
the First District. I've pulled
together some pictures taken over
the years to introduce you to me,
and my family. They also show
some of the experiences that I think
have prepared
me to do a good
job for you
in Congress.

43293

This picture was taken
earlier this year when
I was serving in the
Bush administration
in Washington.

EXHIBIT

A-1



When my father came home from World War II Army service, the only housing available was in public projects. The picture at right is my Dad in uniform. On the left is my Dad playing ball with me when I was two. My parents gave me more than a baseball uniform in the projects. They gave me a belief that with education and hard work, I could make something of my life.

91040843294



Rona and me before the Hughes High School Senior Prom.



We were married two years later.

Graduated from Xavier in 1970. The Dallas Cowboys signed me, but their coaches agreed with the Jesuits that I belonged back in school! Received my Masters in Education a year later.



My first job out of school was teaching at Merry Junior High. After that I taught for several years at Xavier University, I still love teaching.

5
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My first run for Cincinnati City Council. Every minute spent campaigning counted, because I won by only about 500 votes.



← That's my wife Rosa.



The two most important women in my life, my mother, Dana, and Rosa.

Only in America! From a public housing project to Mayor of Cincinnati in three decades. I didn't spend much time behind that desk. I felt the Mayor's job was to be out in the community, providing leadership in making Cincinnati a better and safer place to live and bring up our children.



0 3 4 3 2 9 6



President Reagan reminded me that he too is a Republican by choice, and he welcomed me into the Party.

Jack Kemp, my boss at HUD this past year. Jack gives me a lot of the credit for shaping the Project Hope proposal to make homeownership possible for people of all income levels and cut federal spending at the same time.



Secretary of the Treasury Nicholas Brady. We've spoken several times about ways to contain federal spending and reduce the deficit.



Talking with the President about First District issues after he recruited me earlier this year to run for Congress.

91046343297



My most recent teaching job was at the School of Government at Harvard University, as a Fellow of the Institute of Politics.

These are some of the young people we are trying to reach with the Cincinnati Youth Collaborative, the public-private initiative I co-founded to keep students in school through graduation, and also through the Catholic Inner City School Education Fund which I chaired. Education was the key to a productive life for me. It's their best hope too!



9104



Chairing the Finance Committee was in some ways my most important job on Cincinnati City Council. Opened the budget process to the community. Called back all the laid-off police and firefighters with no new taxes.

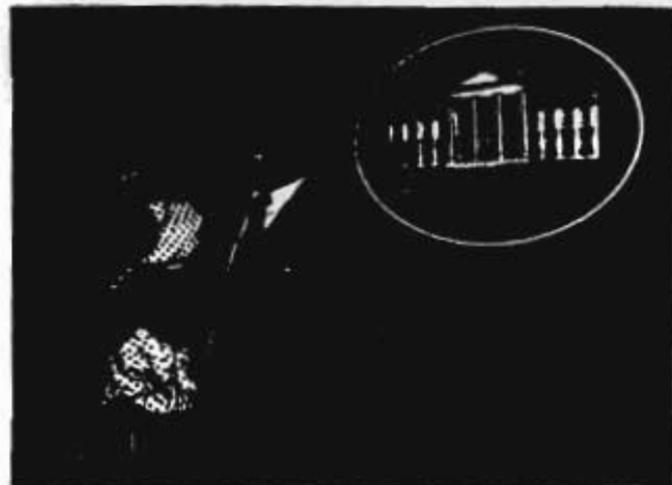
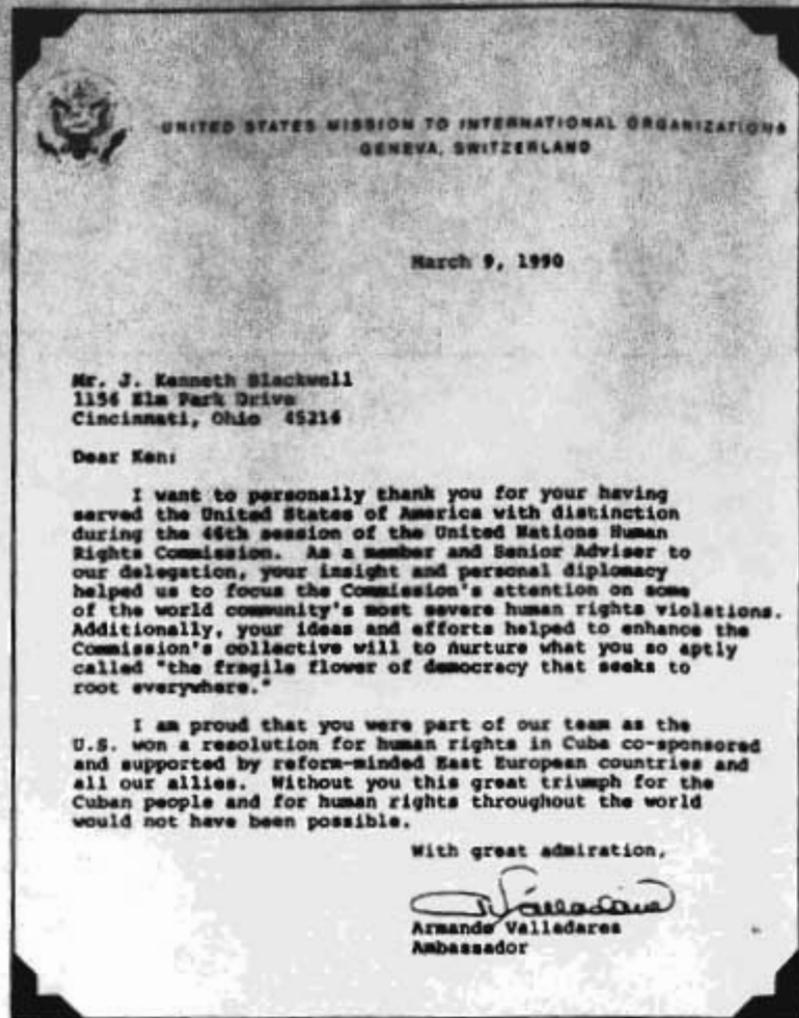


My wife Rosa now. I'm very proud of her. She's the principal of our old high school, Hughes.

I was the Senior advisor to Ambassador Armando Valladares at the 46th Session of the U.N. Human Rights Commission in Geneva, Switzerland. I was very gratified by the letter he wrote about my role in securing the first condemnation of Cuban violations ever passed by this body.



Below with Enrique Bermudez, the leader of the Nicaraguan Freedom Fighters. Since this was taken in 1988, free elections have thrown out the communist Sandinista regime. I've been going to Central America since 1981 in hopes of helping to produce triumphs for democracy like this one.



With our youngest, Kristen,
at the White House.



My wife Rosa and our three children
Kim, Keshana and Kristin at the first
District home we bought 19 years ago.
Thanks for looking through this get-
acquainted album. As you know my
qualifications and positions during
the campaign, I hope you'll decide
that I'm the right person to represent you and your family in Congress.

Sincerely, Ken Blackwell

9104034

1980

Sign In Please!

NAME	ADDRESS & PHONE	ACTIVITY
Louise Muehlenhard	9708 77 th St. New Dr 825-5363	Brochure Stamping
Robert Muehlenhard	9798 Manhattan Dr 825-5363	"
Frank Wolf	9776 Manhattan 825-7215	"
Florence Wolf	9776 Manhattan 825-7215	"
William Orr	1095 Albany Terrace 825-2032	"
Thomas Muehlenhard	9786 Manhattan Dr. 45251 825-2113	"
Joan Lawrence	5256 Mifford St 45233 922-2727	"
Margaret Child	4037 Gaddet Rd 45229 281-7112	"
Ann Cooper	1153 Vienna Ave...	Stamping
Ralph Head	4581 Reading Rd	Stamping
Lisa Friedman	1013 St. Gregory 579-8533	
Mary Russell	2499 Bludub Dr 729-0685	
Mary Ferguson	6750 Chrysanthea Dr 791-8088	Brochure Stamping
Mary Ann Baughman	33 Buxton Woods Lane	Brochure Stamping
Paula McKinnon	2160 Care Ave 281-1815	Stamping
Frances Diamond	563 Grandin Av. 825-7249	Brochure Stamping
Ann Brundmann	5782 Belmont Ave. 591-1034	Stamping
Ray King	6373 Aspen Way 881-8020	Stamping
Cindy Buechel	8623 Willowmeir Ct 385-2599	mail
Bro. Joe	2708 Johnstone Pl 961-6244	Stamping
Evelyn McCullough	7714 Compton Lake Dr 522-2055	

EXHIBIT
A-2

BY _____

Sign In Please!

NAME	ADDRESS & PHONE	ACTIVITY
Pearl Blackwell	11375 Fremont Ave 820-6283	Stamping Brochure
Carlyn Achman	3480 Jessup Rd	Whiter!
Virginia Fry	6426 Orleans Ct.	Brochure Stamp
Florida Trapes	5112 North Bond Rd 661-0718	Stamping
Mary Glibe	12091 Hermitage Court 851-5309	Stamping
Angela M. Lange	2109 Harrison Ave 662-5971	
Wilbur D. Jones	3963 Ardmore 861-4125	Stamping
BRIAN KNAB	5990 Day Rd.	Stamping
Judy Busin	4121 FLAMINGO W 522-4726	Stamping
Ben Lightball	5058 Jessup Rd 903-3809	Stamping
Mordantinghaus	10639 Pottinger 914-4919	Stamping
Nancy Vab	1704 Cedar 681-6393	Brochure
Robert J. Vab	1704 Cedar 681-6393	Brochure
Joe Stargison	2801 Queen City 541-4665	Stamping Brochure
Deborah Manning	506 Kieringwood Dr. 981-9012	mailing
Penny Guffly	2642 OCASTA (11) 661-0986	mailing
Janet Kay	3264 Delomar 741-9021	Mailings
Rita Loh	6542 Elvin Lane 867-9504	Stamping Brochure
Ann Thomas	2508 Harrison 570-3034	Stamping Brochure
James Garvin	2854 Kara Ave 731-1360	Stamping - Brochure
John L. Cox	2610 Moriette Ct 931-1405	Stamping Brochure

BY _____

Sign In Please!

Date 5/21/74

NAME	ADDRESS & PHONE	ACTIVITY
<i>Conrad [unclear]</i>	1153 <i>Winnona Ave</i> (081-4542)	Brochure Mail
<i>Alma Hacke</i>	9075 <i>Cherry Blossom Ln</i>	Brochure stamping
<i>Sue [unclear]</i>	4714 <i>North [unclear] Rd</i> 1:30 3:20	"
<i>Mary [unclear]</i>	3374 <i>Rodes Ct.</i>	Brochure Mail
<i>John [unclear]</i>	3970 <i>Hanley Rd.</i>	Stamping Brochure Mail
<i>Nora [unclear]</i>	6573 <i>Dalewood Rd</i>	Stamping Brochure Mail
<i>Janet [unclear]</i>	3264 <i>Windsor [unclear]</i>	Brochure Mail
<i>Dorothy [unclear]</i>	3041 <i>Lincoln Ave</i>	" "
<i>Judy McMahon</i>	3448 <i>Princeton St</i>	Brochure Mail
<i>Curtis McKimney Jr</i>	2160 <i>Crane Ave</i> 281-1813	Brochure Mail
<i>Martha [unclear]</i>	1226 <i>Bates Ave</i> 45225 591-0340	" "
<i>Betty [unclear]</i>	5728 <i>Shelburne Rd</i> 961-1254	Stamping
<i>Judith [unclear]</i>	7409 <i>South [unclear] Dr</i> 54253	Stamping
<i>John [unclear]</i>	2033 <i>Weyer Ave</i> 7510130	Brochure Stamp 731-0130
<i>Helen [unclear]</i>	5990 <i>Went Rd</i> 982-0574	Brochure Stamp
<i>Angie [unclear]</i>	2174 <i>SOUTH RD</i> 741-3985	Brochure Stamp
<i>Jan [unclear]</i>	963 <i>GODA AVE</i> 661-1898	BROCHURE STAMP
<i>Mark [unclear]</i>	10659 <i>Poppinger Rd</i> 951-4919	Brochure Stamp
<i>Patricia [unclear]</i>	1880 <i>W. [unclear] Rd #4</i> 5455207	BROCHURE Stamp
<i>Harold [unclear]</i>	10302 <i>Reynolds Ln</i> 987 8562	Stamping
TERRI WEBER	2028 <i>NORTH BEND</i> 45239	BROCHURE STAMP

BY _____

Sign In Please!

NAME	ADDRESS & PHONE	ACTIVITY
Ann Cooper	1153 Miconia Ave 681-4548	Brochure Stamping
Frank Lutz	9776 Manhattan 825-7215	Brochure Stamping
Conita McKinney	2160 Crane Ave 281-1813	Stamp
John Thomas	5656 Midforest 922-2727	"
Regie Reed	4821 Reading Rd 242-4038	"
Mary Gliche	12091 Frontone 851-5309	"
Roy Kling	1373 Aspen Way 681-8620	"
Kate Jones	5596 Sidney 922-9424	"
Don Dorrell	5596 Sady 922-9424	"
Shonda Mason	5172 North Bend 661-0718	"
Duke Atkins	328 Duxons Ave 821-2585	"
Mary Ann	3374 Rodas Ct. 481-3841	"
Robert Thompson	2052 N Sand Rd 681-1755	
LARRY ROWE	5160 BRADSHAW Ave 984-1118	
Bradley	2708 Johnston Rd. 961-6294	
Angela M. Spragg	2109 Harrison Ave #14 1612-5971	
Judy M. M.	448 Ringwood Ln 741-7773	"

BY _____

91040843306



91040843307



91040843308



91040843309



91040843310



THE WESTERMAN PRINT COMPANY

116 Colerain Avenue
Cincinnati, Ohio 45214
313) 721-6492

REMIT TO:
LOCATION NO. 00351
CINCINNATI, OHIO 45204

INVOICE TO:
Ohio Republican Party
172 East State Street, Suite 400
Columbus, OH 43215
ATTN: John Hurd

INVOICE NO. 41169

INVOICE DATE 9/7/90	OUR ORDER NO.	CUSTOMER ORDER NO.	TERMS Net 30
------------------------	---------------	--------------------	-----------------

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
----------	-------------	------------	--------

DEL:

183,000	Photo Album Brochures for Blackwell Congressional campaign		29,280.00
2,000	Blackwell - Barbara Bush Fans		550.00
	Sales Tax		1,640.65
Invoice Total			\$ 31,470.65

91040343311



ORIGINAL INVOICE

"We hereby certify that these goods were produced in compliance with all applicable requirements of Section 6, 7 and 12 of the Fair Labor Standards Act, as amended, and of regulations and orders of the United States Department of Labor issued, under Section 14 thereof."

POSTAL SERVICE PERMIT SYSTEM #90256132557MS
 3602/3607 MAILING STATEMENT/WEIGHING & DISPATCH CERTIFICATE

STATION OR UNIT: CINCINNATI OH 45234

PERMIT NO: 01493
 COMPANY PERMIT USED: Y

FINANCE NO
 38-1603
 NEWUP
 RANDOM SELECT

PERMIT HOLDER
 OHIO REPUBLICAN PARTY-ST.
 172 E STATE ST
 COLUMBUS, OH 43215-4321
 PCI 0.00%

RECEIVED AND WEIGHED
 DATE 09/13/90
 TIME 1:25:57 PM

CATEGORY - FLAT SIZE
 CLASS CODE 332 - 3C 9LK N/P CAR-RT

NUMBER OF			AIC	WT OF A	PIECES IN	TOTAL	TOTAL
SALMS	TRAYS	OTHER	CODE	SINGLE PC	A POUND	PIECES	POUNDS
0	57	0	125	0.8672	18.450	49,078	2,660.028

FOR TOTAL MAILING	QUALIFYING PRST PIECES	PIECE RATE	PIECES	RATE	POSTAGE
			49,078	0.084	\$4,122.55

TOTAL WT	WT OF PCS	PRESORT TYPE	PIECES	RATE	POSTAGE
2,660.028	0.000	CARRIER ROUTE	49,078	0.053	\$2,601.13

LESS TARE 0.000
 LESS TARE 0.000

NET WT 2,660.028
 NET WT 0.000
 BASIC

I CERTIFY THAT THE MATTER
 MAILED HAS BEEN INSPECTED,
 THE STATEMENT OF MAILING
 ATTACHED HAS BEEN VERIFIED,
 AND THE ANNUAL FEE HAS
 BEEN PAID

CMB/ATTCH
 SPEC SERV

SUBTOTAL POSTAGE \$2,601.13
 ADDITIONAL POSTAGE
 TOTAL POSTAGE \$2,601.13

Ralph A. Howard
 SIGNATURE OF WEIGHER

RECEIVED FOR DISPATCH BY

MAILING IDENTIFICATION CODE #
 COMMENTS

CURRENT BALANCE: \$2,370.20-

3602/07 KH



91040843312

U.S. Postal Service
STATEMENT OF MAILING WITH PERMIT IMPRINTS
 MAILER: Complete all items by typewriter, pen or indelible pencil. Use in duplicate if postage is desired. Check for instructions from your postmaster regarding box labeled "RCA Offices."
 Permit No. **1493**

Post Office of Mailing **Cincinnati, OH** Date **9-13-90** Receipt No. _____ Subcode _____ Mailing Statement Sequence No. _____

Check applicable box:
 International
 3rd Class
 4th Class
 Carrier Route
 Library Rate
 Basic ZIP-4
 Special 4th Class Single Piece
 3-Digit ZIP-4
 Priority Special 4th Class
 ZIP-4 Barcoded
 5-Digit
 Basic
 Single Piece



Processing Category (See DMM 128):
 Letters
 Flats
 Machineable Parcels
 Irregular Parcels
 Outside Parcels
 Weight of a single piece _____ lbs
 Mailing Identification Code _____
 TOTAL IN MAILING: Pieces _____ Pounds _____ Sacks _____ Trays _____ Pallets _____ Other Containers _____

Name and Address of Permit Holder (Include ZIP Code)
OHIO REPUBLICAN PARTY
172 E. STATE ST. SUITE 401
COLUMBUS, OHIO 43215

POSTAGE COMPUTATION				
Pound Rate	1. Pound Rate Postage Charge	No. Pounds	Rate Pound \$	Postage
	2. ZIP-4 Barcoded	No. Qual. Pieces	Rate Per Piece \$	Postage
	3. 5-digit ZIP-4	No. Qual. Pieces	Rate Per Piece \$	Postage
	4. Basic ZIP-4	No. Qual. Pieces	Rate Per Piece \$	Postage
	5. Carrier Route	No. Qual. Pieces	Rate Per Piece \$	Postage
	6. 5-digit	No. Qual. Pieces	Rate Per Piece \$	Postage
	7. _____	No. Qual. Pieces	Rate Per Piece \$	Postage
	8. Rate Category	No. of Pieces	Rate Per Piece \$	Postage
	9. SUBTOTAL (1 through 8)			Postage

Name and Address of Individual or Organization for which mailing is prepared (If other than permit holder)
 Check if nonprofit under DMM 623*

Name and Address of Mailing Agent (If other than permit holder)
Blackwell for Congress
1194 P. ppm Rd
Cincinnati, OH 45239

10. Additional Postage Payment (State reasons for additional postage payment on reverse side under Comments) _____ No. of Pieces _____ Rate/Piece \$ _____ Postage _____
 See reverse side
 Check if applicable third-class bulk piece rate is affixed to each piece. (Form 3602-PC required)
 12. TOTAL POSTAGE (9 plus 10) where applicable _____ Total Postage _____

* The signature of a nonprofit mailer certifies that: (1) The mailing does not violate section 623.5 DMM; and (2) Only the mailer's matter is being mailed; and (3) This is not a cooperative mailing with other persons or organizations that are not entitled to special bulk mailing privileges; and (4) This mailing has not been undertaken by the mailer on behalf of or produced for another person or organization that is not entitled to special bulk mailing privileges.
 The submission of a false, fictitious or fraudulent statement may result in imprisonment of up to 5 years and a fine of up to \$10,000 (18 U.S.C. 1001). In addition, a civil penalty of up to \$5,000 and an additional assessment of twice the amount falsely claimed may be imposed (31 U.S.C. 3802).

I hereby certify that all information furnished on this form is accurate and truthful, and that this material presented qualifies for the rates of postage claimed.
 Signature of Permit Holder or Agent (Both principal and agent are liable for any postage deficiency incurred) _____ Telephone No. _____

I CERTIFY that this mailing has been inspected to verify that it qualifies for the rate of postage being paid, and that it is properly prepared (and presorted where required) and that the statement of mailing has been verified and the necessary annual fee has been paid.
 Signature of Weigher _____ Time _____ A.M. / P.M.
 Round Stamp (Required) _____

3
1
3
3
4
3
3
4
0
8
9
1
0
4
0
3
4
3
3
1
3

COPY

POSTAL SERVICE PERMIT SYSTEM #90263131518MS
STATEMENT/WEIGHING & DISPATCH CERTIFICATE

STATION OR UNIT CINCINNATI OH 45234

PERMIT NO: 01493
COMPANY PERMIT USED: Y

FINANCE NO
38-1603
NBKVP

PERMIT HOLDER
OHIO REPUBLICAN PARTY-ST.
PCT 172 E STATE ST
0.00% COLUMBUS, OH 43215-4321

RECEIVED AND WEIGHED | CATEGORY - FLAT SIZE
DATE TIME | CLASS CODE 332 - 3C BLK N/P CAR-RT
09/20/90 1:15:18 PM

SACKS	NUMBER OF TRAYS	OTHER	AIC CODE	WT OF A SINGLE PC	PIECES IN A POUND	TOTAL PIECES	TOTAL POUNDS
0	137	0	125	0.9488	16.863	110,580	6,557.394

FOR TOTAL MAILING	QUALIFYING PRST PIECES	PIECE RATE	PIECES	RATE	POSTAGE
			110,580	0.084	\$9,288.72
TOTAL WT	WT OF PCS	PRESORT TYPE	PIECES	RATE	POSTAGE
6,557.394	0.000	CARRIER ROUTE	110,580	0.053	\$5,860.74
LESS TARE	LESS TARE				
0.000	0.000				
NET WT	NET WT	BASIC			
6,557.394	0.000				

I CERTIFY THAT THE MATTER MAILED HAS BEEN INSPECTED, THE STATEMENT OF MAILING ATTACHED HAS BEEN VERIFIED, AND THE ANNUAL FEE HAS BEEN PAID.

CMB/ATICH
SPEC SERV

SUBTOTAL POSTAGE \$5,860.74
ADDITIONAL POSTAGE
TOTAL POSTAGE \$5,860.74

SIGNATURE OF UNIT

RECEIVED FOR DISPATCH BY

MAILING ID
COMMENTS

CURRENT BALANCE: \$4,530.94-

3602/07 RMS

COPY



U.S. Postal Service
STATEMENT OF MAILING WITH PERMIT IMPRINTS
 MAILED: For all rates by transmitter, post or suitable postmark. Postage duplicate if returned is desired. Check for instructions from your postmaster regarding box labeled "ACA Offset."
 Permit No. **1493**

Post Office of Mailing **Cincinnati OH** Date **9-20-90** Receipt No. Fed. Agency Subcode Mailing Statement Sequence No.

Check applicable box

<input type="checkbox"/> International	<input type="checkbox"/> 3rd Class <input type="checkbox"/> Carrier Route <input type="checkbox"/> Basic ZIP+4 <input type="checkbox"/> 3-Digit ZIP+4 <input type="checkbox"/> ZIP+4 Barcoded <input type="checkbox"/> 5-Digit <input type="checkbox"/> Basic <input type="checkbox"/> Single Piece	<input type="checkbox"/> 4th Class <input type="checkbox"/> Library Rate <input type="checkbox"/> Special 4th Class Single Piece <input type="checkbox"/> Presort Special 4th Class
--	--	--

Processing Category (See DMM 128)

Letters Irregular Parcels
 Flats Outside Parcels
 Machinable Parcels

Weight of a single piece _____ lbs.
 TOTAL IN MAILING: Pieces _____ Pounds _____ Sacks _____ Trays **130** Pallets _____ Other Containers _____

Name and Address of Permit Holder (Include ZIP Code) Telephone No. **614-228-0835**

OHIO REPUBLICAN PARTY
172 E. STATE ST. SUITE 401
COLUMBUS, OHIO 43215

Check if nonprofit under DMM 623*

POSTAGE COMPUTATION					
Pound Rate	1. Pound Rate Postage Charge	No. Pounds	Rate/Pound \$	Postage	
P C E A S E R A T E S	2. ZIP+4 Barcoded	No. Qual. Pieces	Rate Per Piece \$	Postage	
	3. 5-digit ZIP+4	No. Qual. Pieces	Rate Per Piece \$	Postage	
	4. Basic ZIP+4	No. Qual. Pieces	Rate Per Piece \$	Postage	
	5. Carrier Route	No. Qual. Pieces	Rate Per Piece \$	Postage	
	6. 5-digit	No. Qual. Pieces	Rate Per Piece \$	Postage	
	7. Basic	No. Qual. Pieces	Rate Per Piece \$	Postage	
	8. Rate Category	No. of Pieces	Rate Per Piece \$	Postage	
	9. SUBTOTAL (1 through 8)				Postage

Handwritten notes in table:
 Row 5: 110580, .053, 5860.74
 Row 6: 5860.74

Name and Address of Individual or Organization for which mailing is prepared (if other than permit holder)

Check if nonprofit under DMM 623*

Name and Address of Mailing Agent (if other than permit holder)

Blackwell for Congress
7194 Pippin Rd
Cincinnati, OH 45239

10. Additional Postage Payment (State reasons for additional postage payment on reverse side under "Comments")
 See reverse side

11. Check if applicable through bulk piece-rate is affixed to each piece. (Form 3602-PC required)

12. TOTAL POSTAGE (\$ plus 10) where applicable → Total Postage \$

* The signature of a nonprofit mailer certifies that: (1) The mailing does not violate section 623.5 DMM; and (2) Only the mailer's matter is being mailed; and (3) This is not a cooperative mailing with other persons or organizations that are not entitled to special bulk mailing privileges; and (4) This mailing has not been undertaken by the mailer on behalf of or produced for another person or organization that is not entitled to special bulk mailing privileges.

The submission of a false, fictitious or fraudulent statement may result in imprisonment of up to 5 years and a fine of up to \$10,000. (18 U.S.C. 1001) In addition, a civil penalty of up to \$5,000 and an additional assessment of twice the amount falsely claimed may be imposed. (18 U.S.C. 1002)

I hereby certify that all information furnished on this form is accurate and truthful, and that this material presented on this form for the rates of postage claimed.

Signature of Permit Holder or Agent (Both principal and agent are liable for any postage deficiency incurred)



U.S. Postal Service
STATEMENT OF MAILING WITH PERMIT IMPRINTS
 MAILER: Complete all items by typewriter, pen or indelible pencil. Provide a duplicate if necessary. Check for instructions from your postmaster regarding box labeled "RCA Offices."
 Permit No. _____

Post Office of Mailing _____ Date _____ Receipt No. _____ Fed. Agency Subcode _____ Mailing Statement Sequence No. _____

Check applicable box

<input type="checkbox"/> International	1st Class <input type="checkbox"/> ZIP+4 Nonpresort <input type="checkbox"/> ZIP+4 Presort <input type="checkbox"/> DMM 365 Mailing <input type="checkbox"/> DMM 366 Mailing	1st Class <input type="checkbox"/> ZIP+4 Barcoded <input type="checkbox"/> Carrier Route <input type="checkbox"/> Presort First-Class <input type="checkbox"/> Single Piece	<input type="checkbox"/> Other (Specify) _____
--	--	---	--

Processing Category (See DMM 128)

<input type="checkbox"/> Letters	<input type="checkbox"/> Irregular Parcels	Weight of a single piece _____ lbs.	Mailing Identification Code _____												
<input type="checkbox"/> Flats	<input type="checkbox"/> Outside Parcels	<table border="1"> <tr> <th colspan="2">TOTAL IN MAILING</th> <th colspan="4">NUMBER OF</th> </tr> <tr> <td>Pieces</td> <td>Pounds</td> <td>Sacks</td> <td>Trays</td> <td>Pallets</td> <td>Other Containers</td> </tr> </table>		TOTAL IN MAILING		NUMBER OF				Pieces	Pounds	Sacks	Trays	Pallets	Other Containers
TOTAL IN MAILING		NUMBER OF													
Pieces	Pounds	Sacks	Trays	Pallets	Other Containers										
<input type="checkbox"/> Mailable Parcels															

Name and Address of Permit Holder (Include ZIP Code) _____ Telephone No. _____

Name and Address of Individual or Organization for which mailing is prepared (if other than permit holder)	Telephone No.	POSTAGE COMPUTATION			
		Piece Rates	No. Qual. Pieces	Rate Per Piece \$	Postage
		1. ZIP+4 Barcoded			
		2. ZIP+4 Presort			
		3. Presort First Class			
		4. ZIP+4 Nonpresort			
		5. Carrier Route			
		6. Rate Category			
7. SUBTOTAL (1 through 6)					

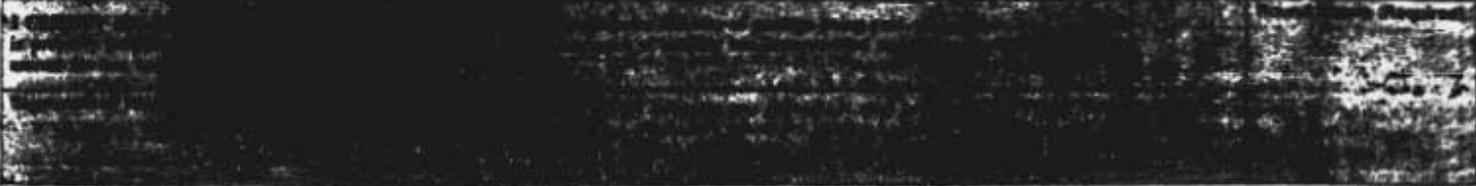
8. Additional Postage Payment (State reasons for additional postage payment under "Comments" below) No. of Pieces _____ Rate/Piece \$ _____ Postage _____

9. TOTAL POSTAGE (7 plus 8) where applicable → Total Postage \$ _____

The submission of a false, fictitious or fraudulent statement may result in imprisonment of up to 5 years and a fine of up to \$10,000. (18 U.S.C. 1001) In addition, a civil penalty of up to \$5,000 and an additional assessment of twice the amount falsely claimed may be imposed. (31 U.S.C. 3802)

I hereby certify that all information furnished on this form is accurate and truthful, and that this material presented qualifies for the rates of postage claimed.

Signature of Permit Holder or Agent (Both principal and agent are liable for any postage deficiency incurred) _____ Telephone No. _____



Comments: _____

Charlie Luken's Record on Taxes:

SUPPORTED CELESTE 6% TAX INCREASE
Charlie Luken was against repealing one of the largest state tax increases in Ohio history. This increase is still costing a typical First District family over \$400 each year.

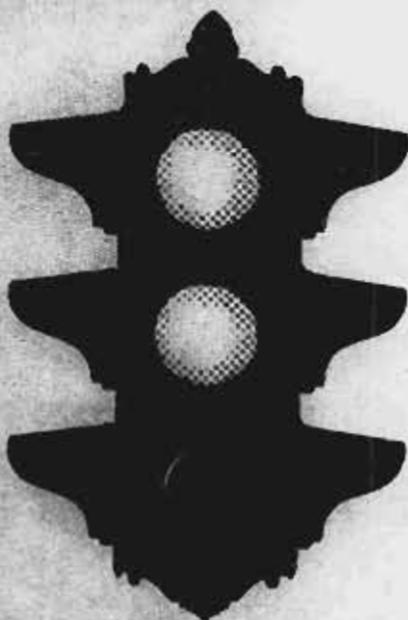
SUPPORTED 15% EARNINGS TAX INCREASE
Charlie voted for a 15% increase in Cincinnati's earnings tax.

SUPPORTED 10% WATER RATE INCREASE

OPPOSED EFFORT TO MAKE IT HARDER FOR THE STATE GOVERNMENT TO RAISE TAXES
Charlie Luken opposed requiring that any future state tax increase be approved by 60% of Ohio state legislators (instead of a simple majority).

With his record
on taxes, what do
you suppose
Charlie Luken
would do as a
member of the
Tax-and-Spend
Majority in
Washington?

GO



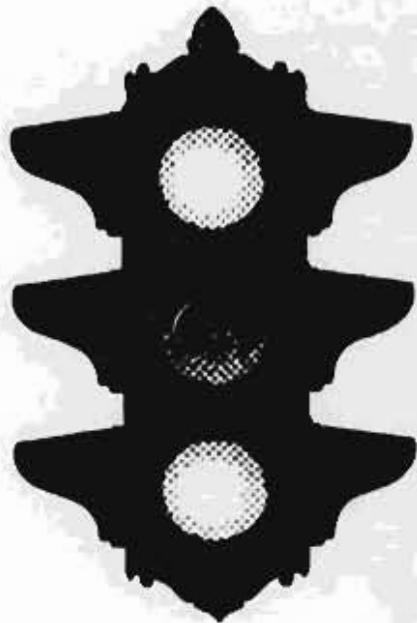
Vote for
Ken Blackwell
for Congress...you
know where he
stands.



9 1 0 4 0 8 4 3 1 8

9 1 0 4 0 8 4 3 3 1 9

CAUTION



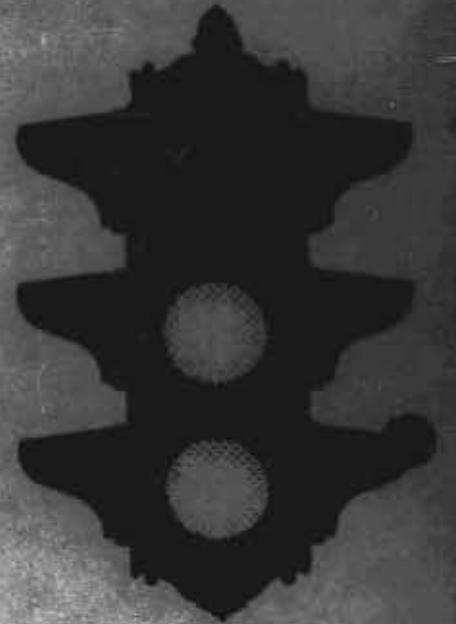
**Please be sure to read
Charlie Luken's record
on taxes.**

Not for use on Ohio Republican Party

CHAR-RT SORT aa CR 70
DANIEL J. JOHNSON
1512 DUBLEY BALANCE ST
CINCINNATI OH 45214

Ohio Republican Party
172 E. State Street
Columbus, Ohio 43215

STOP.



**Think for a moment
about the way taxes hit
your family's budget...**

Sign

NAME	ADDRESS & PHONE	ACTIVITY
Elmer Strout	119 Ranch Ave Wynning Ok 45215	Stamping
Bro. Joe Choquette, S.M.	2768 Johnston Pl. 45206	"
Robert B. Shuler	6622 Dalry Road Cent. 45224	"
Don Farnell	5596 Seiny Ctr 45238	"
Kate Farnell	5596 Seiny Ctr 45238	"
Mac Bredon	2908 Sturtt Cent. 45204	"
Cheryl Cooper	1153 Vienna Ave. Cent. 45-224	BROCHURE stamping
John Thompson	2057 N. Grand Rd	mail stamping
John Stimmer	5656 Midforest 922-2727	"
Pat Meakin	3975 Lecker 662-5473	"
Stelma R Miller	4007 DeWitt Ave 574-4842	"
Charlotte Hunter	1587 Lemontree Dr 857-5214	mailing
OT VA BROWN	1169 Vienna 542-9082	mailing-stamping
Jane Flannery	9681 Long Lyle Dr 857-5485	Stamping
Janet Biggley	3264 Dalmona 741-9621	Stamping
W T MARTIN	331 Ardor Lane 761-1874	Stamping
Judy McMahon	3448 Kessing ⁷⁴⁴⁻⁷⁷⁷³ Cent	Stamping
John C. Scanton	5662 Rapid Run #8 ^{Cent 45208} 922-6900	Stamping
Robbie Muehlenhard	9798 Manhattan 825-5363	Stamping
Bob Muehlenhard	9798 ^{Cent 45251} Manhattan 825-5363	Stamping
Melva Donovan	4124 Nestwood Northern 574-8881	Stamping

EXHIBIT
 B-2

BY _____

Sign

NAME	ADDRESS & PHONE	ACTIVITY
Joyce Krause	715 Evangeline Rd 45240	Stamping
Quilby Pugh	815 Estline Ave 45240	L
James Bruckmann	5782 Belmont Avenue 45234 5917034	Stamping
Alva Goodner	3460 Javis Ln 45137 551-2441	Stamping
Mary Wolf	7972 Stillwe LL Rd 948-1716	Stamping
Mary C. Royal	1728 Race St 45212 381-8225 051-5227	Stamping
Wanda J. Anderson	248 Gilman Ave 45219	Stamping
IREY	9310 HARRISON AVE 553-2528	STAMPING
Day Flawery	9681 LORALINDA DR	Stamping
Bennett Corp	1153 Wierma Ave,	Stamping
Leticia Davis	4880 Winton Rd #4 45232	Stamping
Harold E. Mains	10308 Peachtree Ln. 45242	Stamping
James Crawford	2356 Auburn Ave #2 45219	Stamping
Christine Davis	529 Rockdale Dr 45229	Stamping
Ray & Blackwell	532 Rockdale Ave 45229	Stamping
Lennie Meyer	145 Woodport 45220	Stamping
Gay Miller	555 Cliff Dr. T.L.B 45252	Stamping
Ray B. [unclear]	6159 Francis Ave 45224	Stamping
Public B. [unclear]	2819 McKenley Ave 45211	Stamping
Bernie Dempster	2732 McKenley Ave 45211	Stamping
James Harris	2354 Vera Ave	Stamping

Sign

NAME	ADDRESS & PHONE	ACTIVITY
Conde Cooper	1153 Vienna Ave 681-454237	Stamping
Worothy Lindsley	1916 Goodman Ave.	"
Don Farnell	5576 Sidney Rd	"
Kate Farnell	5576 Sidney Rd	"
Mary Ann	3374 Ropes Rd.	"
John H. Hines	5656 Midforest 722-2727	
B. J. Ve Choquette	M. 2708 Johnson Ave. 961-6244	"
Joe & Diamond	563 Grandin St Spdale 45246	"
Resmond W. Hul	4821 Pembury Rd 45235	"
Joe M. Blair	1169 W 18th Ave 45224	"
Jack H.	1714 Dallas Ave 45237	"
John C. Scambler	5662 Ropes Road #5 Civ. Off 922-6800	"
Pearl Blackwell	11373 Firwood Dr 820-6283	
ROVENA L. PORTER	3336 TRIMBLE 45207	
Judy McMahon	3448 Ringwood Dr 45239	"
Riory L. Ferguson	6750 Clarymont Dr 711-8098 45236	"
Yvonne Boyd	209E. Halliwell Rd	"
Sananta Sakava	4517 Vine St.	"
Paul & Magomas	9613 CRESTBROOK DR 45231 911-0569	"
James Mysonline	2055 Cliff Rd 45052	Stamping
Scott Francis	878 Ferndale Rd 45230	Stamping

91040843325



EXHIBIT
B-3

THE WESTERN PRINT COMPANY

6 Colerain Avenue
Cincinnati, Ohio 45214
1) 721-6492

REMIT TO:
LOCATION NO. 00281
CINCINNATI, OHIO 45284

OFFICE TO: OHIO REPUBLICAN PARTY
ATTN: JOHN HURD
172 E STATE ST, SUITE 400
COLUMBUS, OH 43215

INVOICE NO. 37944
7

ORDER DATE	OUR ORDER NO.	CUSTOMER ORDER NO.	TERMS:
09/30/90	42204		NET 30

QUANTITY	UNIT PRICE	TOTAL
----------	------------	-------

DEL: AMITY

160000	BLACKWELL STOP & GO BROCHURES	11,175.00
	SUB/TOTAL ----->	11,175.00
	SALES TAX	614.63
	INVOICE TOTAL ----->	11,789.63

91040343326

#2

EXHIBIT
B-4

ORIGINAL INVOICE

"We hereby certify that these goods were produced in compliance with all applicable requirements of Section 6, 7 and 12 of the Fair Labor Standards Act, as amended, and of regulations and orders of the United States Department of Labor issued, under Section 14 thereof."

STATEMENT



Mity Unlimited, Inc.

531 N. Wayne Avenue, P.O. Box 15697, Cincinnati, Ohio 45215, (513) 654-4500

OHIO REPUBLICAN PARTY
 ATTN: JOHN HURD
 172 E. STATE STREET
 COLUMBUS OH 43215

ACCOUNT NUMBER	DATE
1264	9/30/90

INVOICE NUMBER	JOB NUMBER	CHARGES			CREDITS			BALANCE
		CODE	DATE	AMOUNT	CODE	DATE	AMOUNT	
914289 ADVANCE	0015169 0015169	1	9/28/90	4,580.81	44	10/01/90	4,342.00	238.81
FUTURE		CURRENT		30 - 60 DAYS	60 - 90 DAYS	OVER 90 DAYS	BALANCE DUE	
		238.81		.00	.00	.00	238.81	

91040843328

30 - INVOICE
 31 - POST DATED INVOICE
 40 - 48 - CHARGE ADJUSTMENTS
 50 - CREDIT MEMO

60 - INVOICE
 61 - GENERAL PAYMENT
 70 - 76 - CREDIT ADJUSTMENTS
 * - APPLICATION OF GEN. PAYMT.

INVOICE 99998 - OPEN CREDIT
 INVOICE 99999 UNPAID PRIOR
 SERVICE CHARGE

POSTAL SERVICE PERMIT SYSTEM 890270095050MS
 3602/3607 MAILING STATEMENT/WEIGHING & DISPATCH CERTIFICATE

STATION OR UNIT: CINCINNATI OH 45234

PERMIT NO: 01493
 COMPANY PERMIT USED: Y

FINANCE NO
 38-1603
 NBRUP

PERMIT HOLDER
 OHIO REPUBLICAN PARTY-ST.
 172 E STATE ST
 COLUMBUS, OH 43215-4221

RECEIVED AND WEIGHED DATE: 09/27/90 TIME: 01:50:50
 CATEGORY - LETTER SIZE CLASS CODE 332 - 30 BLK NY CAR-21

SACKS	NUMBER OF		AIC CODE	WT OF A SINGLE PC	PIECES IN A POUND	TOTAL PIECES	TOTAL POUNDS
	TRAYS	OTHER					
3	113	0	125	0.2784	50.171	156,358	2,755.42

FOR TOTAL MAILING	QUALIFYING FIRST PIECES	PIECE RATE	PIECES	RATE	POSTAGE
			156,358	0.084	\$13,302.67

TOTAL WT	WT OF PCS	RESORT TYPE	PIECES	RATE	POSTAGE
2,755.42	2,595.92	CARRIER ROUTE	156,358	0.084	\$13,302.67

LYN TAKE	LYN TAKE				
	0.000				

NET WT	NET WT	PRIC			
2,755.42	2,595.92				

I CERTIFY THAT THE SAID MAILED MAIL HAS BEEN INSPECTED, THE STATEMENT OF MAILING ATTACHED HAS BEEN VERIFIED, AND THE ANNUAL FEE HAS BEEN PAID.

CHK/ATCH SPEC SERV

SUPPLEMENTAL POSTAGE	10,400.00
ADDITIONAL POSTAGE	
NET POSTAGE	10,400.00

SIGNATURE OF WEAIGHTER

RECEIVED FOR DISPATCH BY

MAILING IDENTIFICATION CODE & COMMENTS

CURRENT BALANCE: \$203.00

3602/07 MUL



COPY

91040343329

91040843330

U.S. POSTAL SERVICE

MAIN OFFICE STA
UNIT FIN 381603
ZIP CODE 45214-9998
3AUC E 4
85-26-98 25189189

FORM 3544 - RPT FOR MONEY

RECEIPT # 248856
PERMIT # 1497
AMOUNT \$ 8586.24

88866666 DOLLARS PERMENTS

810 252 PER IMPRINT 104

NAME: OHIO REP. PARTY

*** THANK YOU ***

Ohio
Blue Ribbon

2 U.S.C. 4

In-Kind:

Ken Blacks
Eugene P. . .
7194 Pippi
Cincinnati

Permit #14:

172 E
Colum

What I Did On My Summer Vacation

I worked with my Dad all summer. He is running for Congress. We worked so hard every day. We went so many places and met a lot of people. They were very nice to us. I really liked going to all the festivals and parades. I made a lot of new friends. I had so much fun working with my Dad.

Kristin
Blackwell

Ohio Republican Party
172 E. State Street
Columbus, OH 43215

91040843331

Printed by the Ohio Republican Party



"The choice is clear. The First District, the nation and my administration need Ken Blackwell in Congress."
— President George Bush

Ken Blackwell's record, a decade of effort on behalf of families.

- Led effort to defeat school based "sex clinics" in Cincinnati schools. October, 1986.
- Led effort to ban sexually explicit cable programming. May, 1983.
- Supported legislation to make it illegal for parents to allow minors to consume alcohol or illicit drugs. May-June, 1986.
- Led effort to prohibit display of sexually explicit magazines to juveniles. February, 1984.
- Led effort to disclaim city support of the "Sister Mary Ignatius Explains It All for You" theatrical production, condemned as offensive and insulting to Catholics by Archbishop Pilarczyk. September, 1984.
- Led effort to proclaim January 22 as Right-to-Life Day in Cincinnati. January, 1984.
- Introduced legislation requiring the notification of parents of minors seeking abortions. 1980.

KEN BLACKWELL

leading the way
to protect
American values
and preserve
family values



We support the Blackwell for Congress
because... his dedication to life, family,
and...
The Hansen Family - Ashland



If I could see the Blackwell
my children may have been
involved in a school...
The Suppe Family - Delhi



Ken Blackwell is right when he
says parents should have the right
to choose when to send their children
to school. We support education
& school and we support Ken
in Ballwin - Ballwin



Ken Blackwell is right when he
says parents should have the right
to choose when to send their children
to school. We support education
& school and we support Ken
in Ballwin - Ballwin



Because of Ken, we did not have to
send our children to school...
The Spill Family - Delmar



We're glad that Ken had the guts
to lead the fight against...
The Coyle Family - Colby Hill

My wife Rosa and
our three children
at our First District
home. We'd been
married three years
when we bought
this home in 1971.
Our oldest child
Kimberly, is going into
her junior year at
Syracuse University.

Our son Robinson
is a junior at Walnut Hills High School. Our youngest,
Kristen, is in the fourth grade. I hope to have an
opportunity to meet you and your family sometime soon.

This is me
Kristen

Sincerely, Ken

Blackwell for Congress

Date 10/8/90

Sign

NAME	ADDRESS & PHONE	ACTIVITY
John Starnes	566 M. Street 922-2727	Addressing/STUFFING
Bill Blankenship	2694 HAVILEY RD. 385-3123	"
Cindy Buchler	8623 Willowview Ct. 385-2594	"
May Carr	3374 Rodeo 481-3841	"
Al Carr	3374 Rodeo CT 481-3841	"
Pico Lee	2701 S. J. St. 761-2244	"
Dwight Thompson	205 N. Bond Rd	MAIL
Karen L. Eshardt	4494 Running Fawn Dr. 574-4767	addressing /stuffing
Rebecca BROWNING	8161 W. West Rd. Unit 385-8328	addressing /stuffing
Rosemary Reiford	43-6523	"
BRIAN KAIS	5990 Day Rd 385-8112	"
Ben Lighthall	5058 Jessup Rd. 813-3909	"
Chad Miller	6680 W. Farmacia 531-6112	Stamping
James Bowley	4660 Rapid Run #12 244-6219	
John Frier	9310 HARRISON AVE 953-2528	
Betty Jane Bowley	5725 Dunlap, 385-6125	mailing

EXHIBIT
C-2

BY _____

Sign

NAME	ADDRESS & PHONE	ACTIVITY
Joyce Krause	715 Evangeline Rd 45240	Stamping
Gaylyn Pugh	815 Estline Ave 45240	Stamping
James Bruckmann	5782 Belmont Avenue 45224 5917034	Stamping
Alva Goodnow	3460 Jawn Ln 45237 551-2441	Stamping
Mary Wolf	7972 Stillme LL Rd 948-1716	Stamping
Mary C. Royal	1728 Race St 381-8225 051-5777	Stamping
Wanda J. Adams	248 Gilman Ave 45219	Stamping
IREY	8310 HARRISON AVE 553-2528	Stamping
Jay Flannery	9681 Lorain Dr	Stamping
Behne +	1153 Wionna Ave,	Stamping
Leticia Davis	4880 Winton Rd #4 45232	Stamping
Harold E. Mains	10308 Peachtree Ln. 45242	Stamping
James Crawford	2356 Auburn Ave #2 45219	Stamping
Christine Davis	529 Rockdale Ave 45239	Stamping
Ray J. Blackwell	532 Rockdale Ave 45239	Stamping
Lennie Mager	145 Woolper 45220	Stamping
Jenny Mays	555 Cliff Rd. N.B. 45205	Stamping
Ray B. ...	959 Francis Ave 45224	Stamping
Philip B. ...	2819 McKersley Ave 45211	Stamping
Bernie Dempster	2732 McKinley Ave 45211 662-0930	Stamping
James ...	2354 Wescott	Stamping

Handwritten scribbles at the bottom of the page.

BY _____

Sign

NAME	ADDRESS & PHONE	ACTIVITY
Conrad Cooper*	1153 Vienna Ave 681-4524	Stamping
Wootley Lindsley*	1916 Goodman Ave.	"
Don Farnell	5596 Sidney Rd	"
Kate Farnell	5596 Sidney Rd	"
Mary Ann	3374 Ropes Del.	"
John Thomas	5656 Midforest 922-2727	
Bro. Joe Choquette	M. 2208 Johnstone, 961-6244	"
Steve Dimond*	563 Grandin St Spdale, 41246	"
Renald W. Hul	4821 Reading Rd 45235	"
Joe M. Blawie	1169 Wilcox Ave 45224	"
David Hill	1714 Dallas Ave 45231	"
John C. Scallow	5667 Rapid Run Rd #8 Cincinnati OH 922-6800	"
Pearl Blackwell	11373 Fremont Ave 825-6283	"
ROSENA L. PORTER*	3336 TRIMBLE 45207	
Judy McMahon	3448 Ringwood Dr 45239	"
Frederic L. Ferguson	6750 Chrysalis Dr 791-8098 45236	"
John Boyd	209 E. Halliway Rd.	"
Sanantirakavan	4517 Vine St.	"
Paul & Margaret	9613 CRESTBROOK DR 45231 911-0569	"
James Mysonline	2655 Cliff Rd 45052	Stamping
Scott Harris	878 Fenwick Rd 45230	Stamping

Sign

NAME	ADDRESS & PHONE	ACTIVITY
Elaine Grant	119 Peach Ave Warming 45215	Stamping
Bob Joe Crockett, Sr.	2708 Johnston Pl. 45206	"
Bob B. Skelley	6622 Daley Road Cinti 45224	"
Donna Fancee	5596 Seiny Cinti 45238	"
Keta Fancee	5596 Seiny Cinti 45238	"
Maie Oreadon	2808 Stewart Cinti 45204	"
Ann Cooper	1153 Vienna Ave Cinti 45224	Brochure Stamping
Robert Thompson	2057 N. Bond Rd	Mail Stamp mail-stamping
John Stimmer	5656 Midforest 922-2727	"
Pat Morris	2975 Lecker 662-5473	"
Helma R. Miller	4007 Dew Ave 574-4842	"
Charlotte Hunter	1587 Lenox Dr 857-9214	mailing
TVA BROWN	1169 Vienna 542-9082	mailing-stamping
Jane Flannery	9681 Long Lytle Dr 857-5485	Stamping
Jane W. Day	3264 Delaware 741-9021	Stamping
HWT MARTIN	331 Ardour 761-1974	Stamping
Judy McMahon	3448 Kensington 744-7773	Stamping
John S. Barton	5662 Regit Court 8 922-6800	Stamping
Loise Muehlenhard	9798 Manhattan 825-5363	Stamping
Bob Muehlenhard	9798 Manhattan 825-5363	Stamping
Melba Donovan	4124 Westwood Northern 574-8891	Stamping

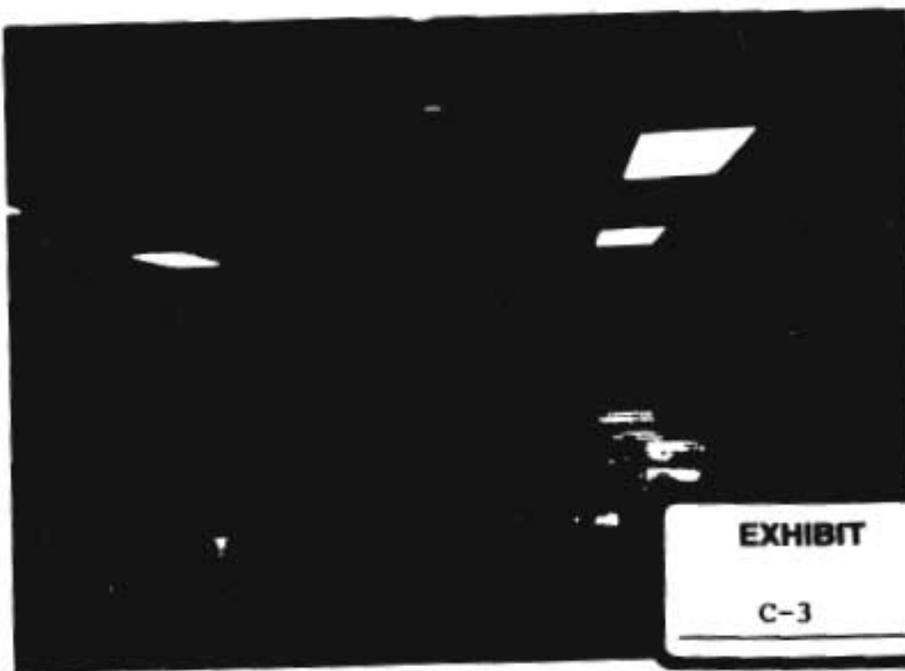
Sign

NAME	ADDRESS & PHONE	ACTIVITY
Mary Carr	3374 Rodeo	
John Stinson	5656 Midforest	
Charlotte Hunter	1587 Leconte	mailing
Debi Moore	778 Rock Lake	
Patricia Ferguson	2067 N. Band Rd.	mail
Peggie Head		DELIVERY
Carolyn Ackerman	3480 Gosling Rd	MAILING
Ann Mc Day	5137 Sumner Ave.	
Elmer Bartel	8248 Woodhens Ave	
Lynna Bartel	"	
John Scanlon	5762 Ruffed Grouse Rd. # 8 5236	MAILING
Peter McCoy	6541 Teakwood Ct.	MAILING
Scott Atkinson	53 Bluegrass 41075	photographs
Mary L Ferguson	6750 Chrymme Dr 791-8098	folding & stuffing
Emil Dickey	7756 Concord Hill 984-6436	
Jay Flannery	9681 Lords Linda Dr	851-5485
Sue Flannery	" " "	" " "
Debbie Dillon	117 E Collins Oxford Oh 523-9230	
Paula Smith-Goodson	" "	"
Julie B. L.	" "	"
Katie Dillon	252 Emerson Oxford Oh 529-3558	

Sign

NAME	ADDRESS & PHONE	ACTIVITY
James Fleming	9681 Lora Linda Dr 852-5485	Stamping
John C. Deaton	5662 Rapid Run Pkwy 45238 512-650-222-2089	Stamping
Mary L Ferguson	6750 Clarymont Dr 791-8098	"
Ernie Dickey	7756 Concord Hills 984-6436	"
Mary Deuge	266 Greenwell Pl 922-4239	
WT MARTIN	331 Arden Lakes 761-7872 45315	Mailing
Just Sanders	830 Redmill Dr. 520-4452	"
Arthur Rachmil	8553 Primale Dr. 521-6457	Mailing
John FRET	9310 HARRISON AVE 553-2528	Mailing
Ernie Trozier	165 Maple Ave 961-1150	Mailing
Andrew Thompson	2057 N. Birch Rd	"
Thomas Edlin	3040 Junette Ave	"
Paul Zwiesemer	9613 CRESTBROOK 931-8562 DR	
JAY FLANNERY	9681 LORALINDA DR.	Stamping
Amy Demopolis	6576 Springdale Rd	Trucking
Troy Grant	959 Emerald 931-8891	
JAMES GARIN	2354 vea rva	whatever
James Bruckmann	5782 Belmont Avenue	whatever

91040843339



EXHIBIT

C-3

91040843340



91040843341



THE WESTMAN PRINT COMPANY

16 Colerain Avenue
Cincinnati, Ohio 45214
(513) 721-8492

REMIT TO:
LOCATION NO. 00881
CINCINNATI, OHIO 45284

VOICE TO: OHIO REPUBLICAN PARTY
ATTN: JOHN HURD
172 E STATE ST., SUITE 400
COLUMBUS, OH 43215

INVOICE NO. 3813/
7

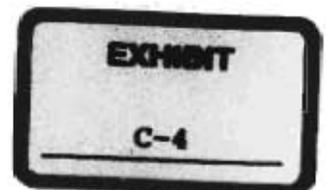
VOICE DATE	OUR ORDER NO.	CUSTOMER ORDER NO.	TERMS
10/15/90	42295		NET 30

DEL: AMITY

161500	KEN BLACKWELL FAMILY VALUES BROCHURE	13,375.00
	SUB/TOTAL ----->	13,375.00
	SALES TAX	735.63
	INVOICE TOTAL ----->	14,110.63

91040843342

#3



ORIGINAL INVOICE

"We hereby certify that these goods were produced in compliance with all applicable requirements of Section 8, 7 and 12 of the Fair Labor Standards Act, as amended, and of regulations and orders of the United States Department of Labor issued, under Section 14 thereof."



Amity Unlimited, Inc.
531 North Wayne Avenue, P.O. Box 15697, Cincinnati, Ohio 45215, (513) 554-4500
Amity's Unlimited Services: Mailing, Printing, Typesetting, Creative, Ad Response, Warehousing, Mail Lists

Ohio Republican Party
Attn: John Hurd
172 East State St., Ste 400
Columbus, OH 43215

Invoice No. 3
Date of Invoice October 1, 1990
Our Order No. 0-15271

Delivery Date Purchased By Terms Purchase Order No.

CLIENT:		CHARGES	CREDITS	BALANCE
91040843343	163,000	Print Labels Carrier Route & 5 Digit Sort	1,018.00	
	163,000	Cheshire Address, Tray, Mark Zip Code Breaks	<u>2,524.00</u>	
		TOTAL	3,542.00	\$3,542.00

EXHIBIT C-5

We have requested a copy of the postage receipt from the U.S. Postal Service and will supplement this Affidavit with a copy for the Commission as soon as we receive it. Our copy has been misplaced.

91040843344

EXHIBIT

C-5

LOCATED AT:
 437 MAIN STREET
 CINCINNATI, OHIO 45202
 PHONE (513) 621-1052
 FAX NO. (513) 621-7339



PLEASE REMIT TO:
 P.O. BOX 1136
 CINCINNATI, OHIO 45201
 TAXPAYER I.D. NO. 25-1047000

PAGE: 1

IN BUSINESS SINCE 1901
 SOLD TO: OHIO REPUBLICAN PARTY
 172 EAST STATE STREET
 COLUMBUS, OH 43215

09/11/90 5604447-IN

CUSTOMER NO: OH1172
 SHIP VIA PICK-UP

ATTN: MARY YOUNG
 CUSTOMER P.O.

- SAID
- GATING & RUBBERING
- STAMPS
- INK PADS
- INK
- AUTOMATIC
- MULLERS & ROLLERS
- TYPE STAMPS
- SEALS
- PLASTIC ENGRAVED SIGNS
- 5 FACSIMILE SIGNATURE
- 4 STAMPS
- 3 SELF INKING STAMPS
- 2
- 1

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
15	IDEAL STAMPERS	14.25	213.75

SHIP TO: OHIO REPUBLICAN PARTY
 172 EAST STATE STREET
 COLUMBUS, OH 43215

NET INVOICE: 213.75
 DISC: .00
 SALES TAX: 11.76
 SHIPPING: .00
 INVOICE TOTAL: 225.51

PLEASE PAY FROM THIS INVOICE--Statement Sent Only Upon Request

TERMS: NET 30 DAYS. TO INSURE PROPER CREDIT TO YOUR ACCOUNT,
 PLEASE SEND COPY OF YOUR INVOICE OR LIST INVOICE NUMBER ON YOUR
 REMITTANCE ADVICE. ORIGINAL INVOICE



EXHIBIT
 D



Amity Unlimited, Inc.
 531 North Wayne Avenue, P.O. Box 15897, Cincinnati, Ohio 45215, (513) 554-4500
 Amity's Unlimited Services: Mailing, Printing, Typesetting, Creative, Ad Response, Warehousing, Mail Lists

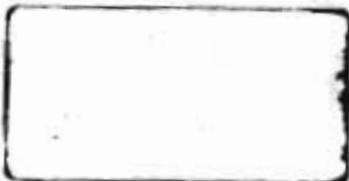
Ohio Republican Party
 Attn: John Hurd
 172 East State St., Ste 400
 Columbus, OH 43215

Invoice No.
 Date of Invoice 10-25-90
 Our Order No. 0-15741

Delivery Date Purchased By Terms Purchase Order No.

CLIENT		CHARGES	CREDITS	BALANCE
17,576	Print Labels Carrier Route & 5 Digit Sort	109.85		
17,576	Cheshire Address, Tray, Mark Zip Code Breaks Programming	272.08		
	TOTAL	<u>150.00</u> 531.93		\$531.93

9104084334





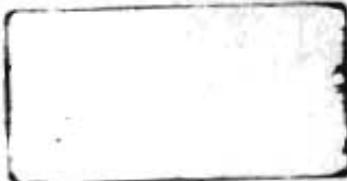
Amity Unlimited, Inc.
 531 North Wayne Avenue, P.O. Box 15697, Cincinnati, Ohio 45215, (513) 554-4500
 Amity's Unlimited Services: Mailing, Printing, Typesetting, Creative, Ad Response, Warehousing, Mail Lists

Ohio Republican Party
 Attn: John Hurd
 172 E. State St., Suite 400
 Columbus, OH 43215

Invoice No.
 Date of Invoice 10-30-90
 Our Order No. 0-15743

Delivery Date Purchased By Terms Purchase Order No.

CLIENT:	CHARGES	CREDITS	BALANCE
9104034347 39,462 Print out Cheshire labels in carrier route order	246.64		
39,462 Cheshire Address, Tray, Mark for Postal Breaks	610.87		
TOTAL	857.51		\$857.51



STATEMENT



Army Uniforms, Inc.
531 N. Wayne Avenue, P.O. Box 15697, Cincinnati, Ohio 45215, (513) 554-4500

UNITED STATES ARMY
ATTN: ADJUTANT
172 1/2 STATE STREET
COLUMBUS OH 43215

ACCOUNT NUMBER	DATE

INVOICE NUMBER	JOB NUMBER	CHARGES			CREDITS			BALANCE
		CODE	DATE	AMOUNT	CODE	DATE	AMOUNT	
	0015271	1	10/31/70	1,752.31				
	0015271				44	03/18/70	3,242.00	
	0015514		10/31/70	3,750.72				
	0015514				44	10/22/70	3,540.00	
FUTURE		CURRENT	30 - 60 DAYS	60 - 90 DAYS	OVER 90 DAYS	BALANCE DUE		

91040843348

30 - INVOICE
31 - POST DATED INVOICE
40 - 45 - CHARGE ADJUSTMENTS
50 - CREDIT MEMO

60 - INVOICE
61 - GENERAL PAYMENT
70 - 75 - CREDIT ADJUSTMENTS
* - APPLICATION OF GEN. PAYMT.

INVOICE 9998 - OPEN CREDIT
INVOICE 9999 UNPAID PRIOR
SERVICE CHARGE

INVOICE



Amity Unlimited, Inc.
631 N. Wayne Avenue, P.O. Box 15897, Cincinnati, Ohio 45215, (513) 554-4800

SOLD TO:
OHIO REPUBLICAN PARTY
ATTN. JOHN HURD
172 E. STATE STREET
COLUMBUS OH 43215

PUR. BY:
CLIENT:
REF:

SHIP TO:

TERMS: PAYABLE UPON RECEIPT

CUSTOMER NO.	CUSTOMER REFERENCE	SALESMAN	DATE SHIPPED	SHIPPED VIA	INVOICE NO.	INVOICE DATE
1264		T H Jansen			14990	11/28/90

JOB NUMBER	DESCRIPTION	AMOUNT
0015875	0 COMPUTER WORK FOR BLACKMELL CAMPAIGN	
	PROCESS TAPE & PRINT COMPLETE LIST OF NAMES AND PHONE NUMBERS FOR TELEPHONE CAMPAIGN...	100.00
	NET AMT	100.00
	REGULAR TAX CD	5.50

91040843

NET AMOUNT	TAX %	TAX AMOUNT	SHIPPING CHARGES	TOTAL
100.00		5.50		105.50

PAY THIS AMOUNT →

ORIGINAL INVOICE

TERMS: PAYABLE UPON RECEIPT

INVOICE



Family Unlimited Inc.

631 N. Wayne Avenue, P.O. Box 15887, Cincinnati, Ohio 45215, (613) 654-4600

SOLD TO:

OHIO REPUBLICAN PARTY
ATTN: JOHN HURD
172 E. STATE STREET
COLUMBUS OH 43215

PUR. BY: JOHN HURD
CLIENT: KEN BLACKWELL
REF: 3

SHIP TO:

TERMS: PAYABLE UPON RECEIPT

CUSTOMER NO.	CUSTOMER REFERENCE	SALESMAN	DATE SHIPPED	SHIPPED VIA	INVOICE NO.	INVOICE DATE
0264	3	R J Janszen		D	14664	10/31/90
JOB NUMBER	DESCRIPTION					AMOUNT
0015271	O OCTOBER 9 KEN BLACKWELL MAILING					
	163,000 PRINT LABELS CARRIER ROUTE 5 DIGIT SORT					1,018.00
	163,000 CHESHIRE ADDRESS, TRAY, MARK ZIP CODE BREAKS					2,524.00
	NET AMT					3,542.00
	REGULAR TAX CD					194.81
	ADVANCE					3,542.00CR
	SHIPPING CHARGE					15.50
	NET AMOUNT	TAX %	TAX AMOUNT	SHIPPING CHARGES	TOTAL	
	3,542.00		194.81		210.31	

PAY THIS AMOUNT →

ORIGINAL INVOICE

TERMS: PAYABLE UPON RECEIPT

91040843

northern printing

11383 landan lane
cincinnati ohio 45246

772-0020

Ohio Republican Party
X Ken Blackwell
7194 Pippin Rd.
Cincinnati, OH 45239

Attn: Mary

DATE
10/25/90

INVOICE NO.
8655

CUSTOMER ORDER NO.

OUR ORDER NO.
8524

TERMS:
NET 30 DAYS

QUANTITY	DESCRIPTION	AMOUNT
100,000	8 1/2 x 11 Campaign Flyer - Blackwell/Luken Pd. 10/17/90	\$1474.00
	OHIO STATE SALES TAX	<u>81.07</u>
	TOTAL THIS INVOICE	\$1555.07

0440843351



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

Paul Silvester

vs.

MUR 3218

Ken Blackwell for Congress Committee

STATE OF OHIO :
: S.S.
COUNTY OF FRANKLIN :

AFFIDAVIT OF JEFFREY LEDBETTER

JEFFREY LEDBETTER, being first duly cautioned and sworn, states for his affidavit as follows:

1. I am Executive Director of the Ohio Republican Finance Committee, the principal fundraising auxiliary of the Ohio Republican Party ("ORP"), and I have held that position at all times relevant to the Complaint. It is my responsibility to raise funds for the ORP's federal account, in accordance with the Federal Election Campaign Act of 1971, as amended ("FECA,") and to authorize payments for activities which must be paid from that account ("Federal Account.")

2. I have read and reviewed the Affidavits of Vada Hill ("Hill Affidavit") and John Hurd ("Hurd Affidavit") in this Matter Under Review. I relied on ongoing representations by personnel of the Ken Blackwell for Congress Committee, and I have relied specifically on the statements contained in the Hill Affidavit for my belief that the requisite "volunteer components" of these non-allocable mailings ("Mailings") were observed.

3. One check copied herein contains an incorrect designation of purpose, purporting to be an "in-kind" expenditure for the Blackwell Committee. That designation was in error. The expenditure was at all times treated as non-allocable.

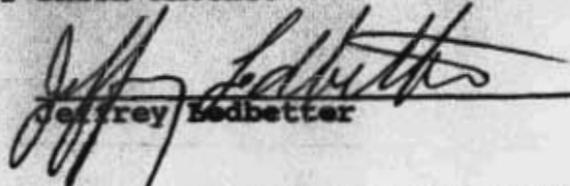
4. The expenses of the mailings were paid by the ORP from the Federal Account, with funds raised, held, and reported according to the rules and regulations of the FECA to the best of my knowledge, information and belief. I authorized each payment from the Federal Account (See, checks and memoranda; Exhibits A, B, and C.)

21040343352

Ledbetter Affidavit
March 5, 1990
Page 2

5. The ORP has not yet finished paying its vendors but is in the process of doing so in the ordinary course of its business.

FURTHER THE AFFIANT SAITH NAUGHT.



Jeffrey Ledbetter

Before me, a Notary Public in and for the said county and state, came Jeffrey Ledbetter, who, being duly cautioned and sworn, made this affidavit on this 5th day of March, 1991.



Notary Public *has no expiration.*
My Commission ~~expires~~ *expiration.*
Ohio Rev. Code § 147.03



GMS20.GMS

91040843353

DATE: October 12, 1990

TO: Brian Berry

cc: Denise Steiner
Jeff Ledbetter

FROM: John Hurd

RE: Bulk Mail Expenditure for Blackwell Mailer #1B
(Printing)

I need a check from the FEDERAL campaign account for the following vendor:

The Westerman Print Co.
2116 Colerain Ave.
Cincinnati, OH 45214

Amt. \$8,000.00

This will be a Federal "Non-Allocable Expenditure" for the following campaign based on 2 U.S.C. 431 (b) (8) (x).

Ken Blackwell for Congress Committee
Eugene P. Ruehlmann, Treasurer
7194 Pippin Rd.
Cincinnati, OH 45239

91040843354

EXHIBIT

A



BankOhio
National Bank
Columbus Area

**OHIO REPUBLICAN PARTY'S FEDERAL
CANDIDATES CAMPAIGN COMMITTEE**
172 EAST STATE STREET • SUITE 401
COLUMBUS, OHIO 43216
October 12, 1990

No. 001545

25-1
40

PAY *EIGHT THOUSAND AND 00/100-----**\$ 8,000.00

TO
THE
ORDER
OF

THE WESTERN PRINT CO.
2116 COLERAIN AVENUE
CINCINNATI, OH 45214

[Signature]
CHAIRMAN
[Signature]
TREASURER

#001545# 1044000011# 840862180#

DETAILS OF PAYMENT FROM OHIO REPUBLICAN PARTY'S FEDERAL CANDIDATES CAMPAIGN COMMITTEE

For - Non-Allocable Expenditure

5600

9 1 0 4 0 8 4 3 3 5 5

DATE: September 18, 1990
TO: Brian Berry cc: Denise Steiner
FROM: John Hurd Jeff Ledbetter
RE: Bulk Mail Expenditure for Blackwell Mailer #1A
(Postage) - Family Album

I need a check from the FEDERAL campaign account for the following vendor:

U. S. Post Office
Main Window Unit
1593 Dalton
Cincinnati, OH 45234

Permit #1493
Amt. \$4,900.00

This will be a Federal "Non-Allocable Expenditure" for the following campaign based on 2 U.S.C. 431 (b) (8) (x).

Ken Blackwell for Congress Committee
Eugene P. Ruehlmann, Treasurer
7194 Pippin Rd.
Cincinnati, OH 45239

91040843356



BankOhio
National Bank
Columbus Area

**OHIO REPUBLICAN PARTY'S FEDERAL
CANDIDATES CAMPAIGN COMMITTEE**
172 EAST STATE STREET • SUITE 401
COLUMBUS, OHIO 43216
September 19, 1990

No. 001530

25-1
440

PAY TO THE ORDER OF FOUR THOUSAND NINE HUNDRED AND 00/100 \$ 4,900.00

U.S. POSTMASTER
MAIN WINDOW UNIT
1593 DALTON
CINCINNATI, OH 45234

Robert K. Williams
CHAIRMAN

TREASURER

#001530# @044000011# 840862180#

DETAIL OF PAYMENT FROM OHIO REPUBLICAN PARTY'S FEDERAL CANDIDATES CAMPAIGN COMMITTEE

For - Non-Allocable for:
Under 20.U.S.C.431(b) (8) (x)

KEN BLACKWELL FOR CONGRESS COMMITTEE
EUGENE P. RUEHLMANN, TREASURER
7194 PIPPIN ROAD
CINCINNATI, OH 45239

5600

7 5 5 3 3 3 8 0 4 0 1 6

DATE: September 13, 1990
TO: Brian Berry cc: Denise Steiner
FROM: John Hurd Jeff Ledbetter
RE: Bulk Mail Expenditure for Blackwell Mailer #1
(Postage)

I need a check from the FEDERAL campaign account for the following vendor:

U. S. Post Office
Main Window Unit
1593 Dalton
Cincinnati, OH 45234

Permit #1493
Amt. \$3,700.00

This will be a Federal "Non-Allocable Expenditure" for the following campaign based on 2 U.S.C. 431 (b) (8) (x).

Ken Blackwell for Congress Committee
Eugene P. Ruehlmann, Treasurer
7194 Pippin Rd.
Cincinnati, OH 45239

91040843358



BankOhio
National Bank
Columbus Ave

OHIO REPUBLICAN PARTY'S FEDERAL
CANDIDATES CAMPAIGN COMMITTEE
172 EAST STATE STREET • SUITE 401
COLUMBUS, OHIO 43215
September 13, 1990

No. 001526

26-1
440

PAY**THREE THOUSAND SEVEN HUNDRED AND 00/100-----**\$ 3,700.00

TO THE ORDER OF
U.S. POSTMASTER
MAIN WINDOW UNIT
1593 DALTON
CINCINNATI, OH 45234

[Handwritten Signature]
CHURMAN
TREASURER

#001526# @0440000111# 840852180#

DETAILS OF PAYMENT FROM OHIO REPUBLICAN PARTY'S FEDERAL CANDIDATES CAMPAIGN COMMITTEE

For - Permit #1493 Non-Allocable Expenditure for:
KEN BLACKWELL FOR CONGRESS COMM.
EUGENE P. RUEHLMANN, TREASURER
7194 PIPPIN ROAD
CINCINNATI, OH 45239

5600

65337804016

DATE: September 18, 1990
TO: Brian Berry cc: Denise Steiner
FROM: John Hurd Jeff Ledbetter
RE: Bulk Mail Expenditure for Blackwell Mailer #1
(Labels)

I need a check from the FEDERAL campaign account for the following vendor:

Amity Unlimited, Inc.
531 North Wayne Ave.
P.O. Box 15697
Cincinnati, OH 45234

Amt. \$3,542.00

This will be a Federal "Non-Allocable Expenditure" for the following campaign based on 2 U.S.C. 431 (b) (8) (x).

Ken Blackwell for Congress Committee
Eugene P. Ruehlmann, Treasurer
7194 Pippin Rd.
Cincinnati, OH 45239

91040843360



BankOhio
National Bank
Columbus Area

**OHIO REPUBLICAN PARTY'S FEDERAL
CANDIDATES CAMPAIGN COMMITTEE**
172 EAST STATE STREET • SUITE 401
COLUMBUS, OHIO 43215
September 19, 1990

No. 001529

2-1
440

PAY THREE THOUSAND FIVE HUNDRED FORTY-TWO AND 00/100----- \$ 3,542.00

TO THE ORDER OF
AMITY UNLIMITED, INC.
531 NORTH WAYNE AVENUE
PO BOX 15697
CINCINNATI, OH 45234

[Handwritten Signature]
Robert K. Williams

CHASMAN
TREASURER

#001529# @044000011# 840862180#

DETAIL OF PAYMENT FROM OHIO REPUBLICAN PARTY'S FEDERAL CANDIDATES CAMPAIGN COMMITTEE

For - Non-Allocable for:
Under 20.U.S.C.431(b) (8) (x) KEN BLACKWELL FOR CONGRESS COMMITTEE
EUGENE P. RUEHLMANN, TREASURER
7194 PIPPIN ROAD
CINCINNATI, OH 45239

5600

19934804016



Amity Unlimited, Inc.
531 North Wayne Avenue, P.O. Box 15897, Cincinnati, Ohio 45215, (513) 554-4500
Amity's Unlimited Services: Mailing, Printing, Typesetting, Creative, Ad Response, Warehousing, Mail Lists

Ohio Republican Party
ATTN: John Hurd
172 East State St., Ste. 400
Columbus, OH 43215

Invoice No. 090790
Date of Invoice Sept. 7, 1990
Our Order No. O-15041

Delivery Date Purchased By Terms Purchase Order No.

91040843362

CLIENT:	CHARGE	CREDITS	BALANCE
163,000 Print Labels Carrier Route & 5 Digit Sort...	\$1,018.00		
163,000 Cheshire Address & Tray, Mark Zip Code Breaks...	2,524.00		\$ 3,542

DATE: September 25, 1990
TO: Brian Berry cc: Denise Steiner
FROM: John Hurd Jeff Ledbetter
RE: Bulk Mail Expenditure for Blackwell Mailer #2
(Postage) - Tax Mailer

I need a check from the FEDERAL campaign account for the following vendor:

U. S. Post Office
Main Window Unit
1593 Dalton
Cincinnati, OH 45234

Permit #1493
Amt. \$8,500.00

This will be a Federal "Non-Allocable Expenditure" for the following campaign based on 2 U.S.C. 431 (b)(8)(x).

Ken Blackwell for Congress Committee
Eugene P. Ruehlmann, Treasurer
7194 Pippin Rd.
Cincinnati, OH 45239

91040843363

EXHIBIT

B



BankOhio
National Bank
Columbus Area

**OHIO REPUBLICAN PARTY'S FEDERAL
CANDIDATES CAMPAIGN COMMITTEE**
172 EAST STATE STREET • SUITE 401
COLUMBUS, OHIO 43215
September 25, 1990

25-1
400

No. 001532

PAY Eight Thousand, Five Hundred and 00/100 ----- \$ 8,500.00

TO THE ORDER OF
U.S. Post Office
Main Window Unit
1593 Dalton
Cincinnati, Ohio 45234

[Signature]
Robert K. Williams
TREASURER

⑆001532⑆ ⑆044000011⑆ ⑆840862180⑆

DETAIL OF PAYMENT FROM OHIO REPUBLICAN PARTY'S FEDERAL CANDIDATES CAMPAIGN COMMITTEE

2 U.S.C. 431 (b)(8)(x)

In-Kind:

Ken Blackwell for Congress Committee
Eugene P. Ruchlmann, Treasurer
7194 Pipplan Rd.
Cincinnati, Ohio 45239
Permit #1493

4 9 3 3 4 8 0 4 0 1 6

DATE: September 28, 1990
TO: Brian Berry cc: Denise Steiner
FROM: John Hurd Jeff Ledbetter
RE: Bulk Mail Expenditure for Blackwell Mailer #2
(Labels)

I need a check from the FEDERAL campaign account for the following vendor:

Amity Unlimited, Inc.
531 North Wayne Ave.
P.O. Box 15697
Cincinnati, OH 45234

Amt. \$4,342.00

This will be a Federal "Non-Allocable Expenditure" for the following campaign based on 2 U.S.C. 431 (b) (8) (x).

Ken Blackwell for Congress Committee
Eugene P. Ruehlmann, Treasurer
7194 Pippin Rd.
Cincinnati, OH 45239

91040843365

9 1, 0 4 0 8 4 3 3 6 6



OHIO REPUBLICAN PARTY'S FEDERAL CANDIDATES CAMPAIGN COMMITTEE

BankOhio
National Bank
Columbus Area

172 EAST STATE STREET • SUITE 401
COLUMBUS, OHIO 43216
September 28, 1990

No. 001536

PAY **FOUR THOUSAND THREE HUNDRED FORTY-TWO AND 00/100** \$ 4,342.00

TO THE ORDER OF
AMITH UNLIMITED, INC.
531 NORTH WAYNE AVENUE
PO BOX 15697
CINCINNATI, OH 45234

[Signature]
CHAIRMAN

⑆001536⑆ ⑆04400001⑆ ⑆840862180⑆

DETAIL OF PAYMENT FROM OHIO REPUBLICAN PARTY'S FEDERAL CANDIDATES CAMPAIGN COMMITTEE

For - Non-Allocable under
2 U.S.C. 431 (b) (8) (x)
KEN BLACKWELL FOR CONGRESS COMMITTEE
EUGENE P. MUEHLHANN, TREASURER
7194 PIPPIN ROAD
CINCINNATI, OH 45239

5600



Amity Unlimited, Inc.
531 North Wayne Avenue, P.O. Box 15897, Cincinnati, Ohio 45215, (513) 554-4500

Amity's Unlimited Services: Mailing, Printing, Typesetting, Creative, Ad Response, Warehousing, Mail Lists

Ohio Republican Party
Attn: John Hurd
172 East State St., Ste. 400
Columbus, OH 43215

Invoice No. 092490

Date of Invoice Sept. 24, 1990

Our Order No. O-15041

Delivery Date

Purchased By

Terms

Purchase Order No.

CLIENT	CHARGES	CREDITS	BALANCE
163,000 Print Labels Carrier Route & 5 Digit Sort...	\$1,018.00		
163,000 Cheshire Address & Tray, Mark Zip Code Breaks...	2,524.00		
Computer Charges	800.00		\$4,342.00

91040843367



Amity Unlimited, Inc.
531 North Wayne Avenue, P.O. Box 15697, Cincinnati, Ohio 45215, (513) 554-4500

Amity's Unlimited Services: Mailing, Printing, Typesetting, Creative, Ad Response, Warehousing, Mail Lists

Ohio Republican Party
Attn: John Hurd
172 East State St., Ste. 400
Columbus, OH 43215

Invoice No. 092490

Date of Invoice Sept. 24, 1990

Our Order No. O-15041

Delivery Date

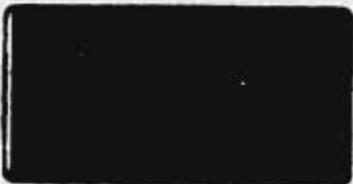
Purchased By

Terms

Purchase Order No.

CLIENT:		CHARGES	CREDITS	BALANCE
6	163,000 Print Labels Carrier Route & 5 Digit Sort...	\$1,018.00		
3	163,000 Cheshire Address & Tray, Mark Zip Code Breaks...	2,524.00		
3	Computer Charges	800.00		\$4,342.00
3				
4				
4				
8				
0				
4				
0				
4				
0				
9				

*Must be paid
by 9-28-90
Bob Jensen*



DATE: October 19, 1990

TO: Brian Berry

cc: Denise Steiner
Jeff Ledbetter

FROM: John Hurd

RE: Bulk Mail Expenditure for Blackwell Mailer #2A
(Labels) Additional Sales Tax

I need a check from the FEDERAL campaign account for the following vendor:

Amity Unlimited, Inc.
531 North Wayne Ave.
P.O. Box 15697
Cincinnati, OH 45234

Amt. \$238.81

This will be a Federal "Non-Allocable Expenditure" for the following campaign based on 2 U.S.C. 431 (b)(8)(x).

Ken Blackwell for Congress Committee
Eugene P. Ruehlmann, Treasurer
7194 Pippin Rd.
Cincinnati, OH 45239

91040843369



BankOhio

Member Bank
Columbus Area

OHIO REPUBLICAN PARTY'S FEDERAL
CANDIDATES CAMPAIGN COMMITTEE

172 EAST STATE STREET • SUITE 401

COLUMBUS, OHIO 43216

October 19, 1990

No. 001549

25-1
400

PAY TWO HUNDRED THIRTY-EIGHT AND 81/100

\$ 238.81

TO THE ORDER OF
AMITY UNLIMITED, INC.
531 NORTH WAYNE AVE.
P.O. BOX 15697
CINCINNATI, OH 45234

Robert K. Wilson
CHAIRMAN

TREASURER

⑆001549⑆ ⑆014000011⑆ 840852180⑆

DETAIL OF PAYMENT FROM OHIO REPUBLICAN PARTY'S FEDERAL CANDIDATES CAMPAIGN COMMITTEE

For - Non-Allocable Expenditure

5600

07030804016

DATE: October 11, 1990
TO: Brian Berry cc: Denise Steiner
FROM: John Hurd Jeff Ledbetter
RE: Bulk Mail Expenditure for Blackwell Mailer #3
(Labels)

I need a check from the FEDERAL campaign account for the following vendor:

Amity Unlimited, Inc.
531 North Wayne Ave.
P.O. Box 15697
Cincinnati, OH 45234

Amt. \$3,542.00

This will be a Federal "Non-Allocable Expenditure" for the following campaign based on 2 U.S.C. 431 (b) (8) (x).

Ken Blackwell for Congress Committee
Eugene P. Ruehlmann, Treasurer
7194 Pippin Rd.
Cincinnati, OH 45239

91040843371

EXHIBIT

C



BancOhio
National Bank
Columbus Area

**OHIO REPUBLICAN PARTY'S FEDERAL
CANDIDATES CAMPAIGN COMMITTEE**

172 EAST STATE STREET - SUITE 401
COLUMBUS, OHIO 43215
October 11, 1990

25-1
440

No. 001542

PAY**THREE THOUSAND FIVE HUNDRED FORTY-TWO AND 00/100-----** \$ 3,542.00

TO THE
ORDER
OF

AMITY UNLIMITED, INC.
531 NORTH WAYNE AVENUE
P.O. BOX 15697
CINCINNATI, OH 45234

[Handwritten Signature]

[Handwritten Signature]

CHAIRMAN

TREASURER

7 2

⑆001542⑆ ⑆044000011⑆ 840862180⑆

DETAIL OF PAYMENT FROM OHIO REPUBLICAN PARTY'S FEDERAL CANDIDATES CAMPAIGN COMMITTEE

2104034

For - Non-Allocable

5600



DATE: October 16, 1990

TO: Brian Berry

cc: Denise Steiner
Jeff Ledbetter

FROM: John Hurd

RE: Bulk Mail Expenditure for Blackwell Mailer #3
(Postage) - Family Values

I need a check from the FEDERAL Campaign account for the following vendor:

U. S. Post Office
Main Window Unit
1593 Dalton
Cincinnati, OH 45234

Permit #1493
Amt. \$8,500.00

This will be a Federal "Non-Allocable Expenditure" for the following campaign based on 2 U.S.C. 431 (b) (8) (x).

Ken Blackwell for Congress Committee
Eugene P. Ruehlmann, Treasurer
7194 Pippin Rd.
Cincinnati, OH 45239

91040843373



BankOhio
National Bank
Columbus Ave

**OHIO REPUBLICAN PARTY'S FEDERAL
CANDIDATES CAMPAIGN COMMITTEE**
172 EAST STATE STREET • SUITE 401
COLUMBUS, OHIO 43218
October 15, 1990

No. 001547

PAY **EIGHT THOUSAND FIVE HUNDRED AND 00/100** \$ 8,500.00

U.S. POSTMASTER
MAIN WINDOW UNIT
1593 DALTON
CINCINNATI, OH 45234

⑆001547⑆ ⑆044000011⑆ 8408E21AD⑆

Robert R. Wilson
CHAIRMAN

DETAILS OF PAYMENT FROM OHIO REPUBLICAN PARTY'S FEDERAL CANDIDATES CAMPAIGN COMMITTEE

For - Non-Allocable Mail Postage

5600



4 7 2 4 8 0 4 0 1 6

BEFORE THE
FEDERAL ELECTION COMMISSION
999 E. Street, NW
Washington, D.C. 20463

Paul Sylvester

vs.

Ken Blackwell for Congress Committee

:
:
: MUR 3218
:
:

DISTRICT OF COLUMBIA :
: S.S.
CITY OF WASHINGTON :

AFFIDAVIT OF VADA HILL

VADA HILL, being first duly cautioned and sworn, states for his affidavit as follows:

1. I was Assistant Campaign Manager for the Ken Blackwell for Congress Committee ("Blackwell Committee.") In that capacity, I was responsible for obtaining volunteers and overseeing their efforts in the campaign. One of the functions I oversaw was the "volunteer component" of the Ohio Republican Party's ("ORP") mailings of campaign materials ("Mailings") under the "non-allocable expenditure" portions of federal campaign laws, as I understood them, though I am not an attorney.

2. The pieces reproduced by Complainant in his Complaint, with one significant and disturbing exception, were such non-allocable mailings. They were done by Blackwell Committee volunteers for the ORP. The ORP, on my information and belief, paid or is responsible for paying the expenses.

3. Attached hereto as Exhibits A-1, B-1 and C-1 are originals of the pieces reproduced in the Complaint, with proof of the volunteer components for each (See, sign-in sheets, Exhibits A-2, B-2 and C-2; photographs, Exhibits A-3, B-3 and C-3).

4. The piece actually mailed to voters in the First District appears in this Affidavit as Exhibit A (hereafter "Album Brochure.") It was prepared at the ORP's expense and contained the ORP's disclaimer. This piece was an edited version of material previously prepared by the Blackwell Committee. (Please refer to the final page of Exhibit A, and the final page of the first version reproduced in the Complaint, to see differences in the ORP's edited version. Then compare each of these to the hybrid version reproduced as what the ORP allegedly mailed.)

91040843376

5. If the photocopies contained in the copy of the Complaint which I have viewed are accurate representations of what Complainant submitted, Complainant's reproduction of the Album Brochure misrepresents the facts. For some reason, Complainant has seen fit to reproduce the earlier version of the Album Brochure, and attach an incomplete copy of the actual address page from the ORP version as his example of what the ORP mailed. Complainant's copy, as received from the Commission, has no disclaimer on it, apparently having been cut off in the copying process. (Please note that the bottom of the page containing the label addressed to Catherine Mangino contains no disclaimer, whereas Exhibit A clearly contains the ORP disclaimer.)

6. On my information and belief, it would be necessary to reproduce the final pages of two separate documents in order to create the document which Complainant presented to the Commission under oath. On my further information and belief, this manner of reproducing the Album Brochure required the copier to possess a copy of each version, and could not have been done inadvertently. In any case, Complainant has thereby created the false impression that the ORP mailed brochures containing the Blackwell Committee's disclaimer.

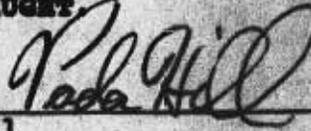
7. On my information and belief, the Mailings were prepared at the ORP's cost. The pieces were delivered to the Blackwell Committee's headquarters already printed and addressed, at ORP's cost. The lists of addressees were purchased from the ORP, at its cost to reproduce them on my information and belief. On my further information and belief, they were compiled from voter lists available to any person from the Hamilton County Board of Elections. They were not purchased from any commercial mail order house or other commercial firm, and they were property of the Blackwell Committee.

8. At Blackwell Committee headquarters, volunteers (see, sign-in sheets, Exhibits A-2, B-2 and C-2) opened the cartons and stamped on each piece, individually, the return address and the bulk mail permit indicia. Then they sorted the pieces into the requisite postal/zip code categories and transported the Mailings to the Postal Service, where they were mailed. (See, photographs, Exhibits A-3, B-3 and C-3) On my information and belief, the postage costs were paid by the ORP.

9. All non-allocable activities over which I had authority were conducted to the best of my knowledge, information, and belief in accordance with all federal rules and regulations as I understood them.

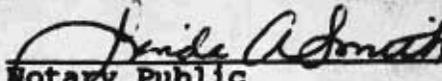
91040843377

FURTHER THE AFFIANT SAITH NAUGHT.



Vada Hill

Before me, a Notary Public in and for the said city and district, came Vada Hill, who, being duly cautioned and sworn, made this affidavit on this 5th day of March, 1991.



Notary Public

My Commission expires My Commission Expires Sept. 14, 1993

9 1 0 4 0 8 4 3 3 7 8

Hello. I'm Ken Blackwell. I'm a
Republican candidate for Congress in
the First District. I've pulled
together some pictures taken over
the years to introduce you to me
and my family. They also show
some of the experiences that I think
have prepared
me to do a good
job for you
in Congress.



43379

This picture was taken
earlier this year when
I was serving in the
Bush administration
in Washington.

EXHIBIT

A-1



When my father came home from World War II Army service, the only housing available was in public projects. The picture at right is my Dad in uniform. On the left is my Dad playing ball with me when I was two. My parents gave me more than a baseball uniform in the projects. They gave me a belief that with education and hard work, I could make something of my life.

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Rona and me before the Hughes High School Senior Prom.



We were married two years later.

Only in America! From a public housing project to Mayor of Cincinnati in three decades. I didn't spend much time behind that desk. I felt the Mayor's job was to be out in the community, providing leadership in making Cincinnati a better and safer place to live and bring up our children.



President Reagan reminded me that he too is a Republican by choice, and he welcomed me into the Party.

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Jack Kemp, my boss at HUD this past year. Jack gives a lot of the credit for shaping the Project Hope proposal to make homeownership possible for people of all income levels and cut federal spending at the same time.



Secretary of The Treasury Nicholas Brady. We've spoken several times about ways to contain federal spending and reduce the deficit.



Talking with the President about First District issues after he recruited me earlier this year to run for Congress.

4 5 3 3 3 3

2 1 0 4 0



My most recent teaching job was at the School of Government at Harvard University, as a Fellow of the Institute of Politics.

These are some of the young people we are trying to reach with the Cincinnati Youth Collaborative, the public-private initiative I co-founded to keep students in school through graduation, and also through the Catholic Inner City School Education Fund which I chaired. Education was the key to a productive life for me. It's their best hope too!



Chairing the Finance Committee was in some ways my most important job on Cincinnati City Council. Opened the budget process to the community. Called back all the laid-off police and firefighters with no new taxes.

91040



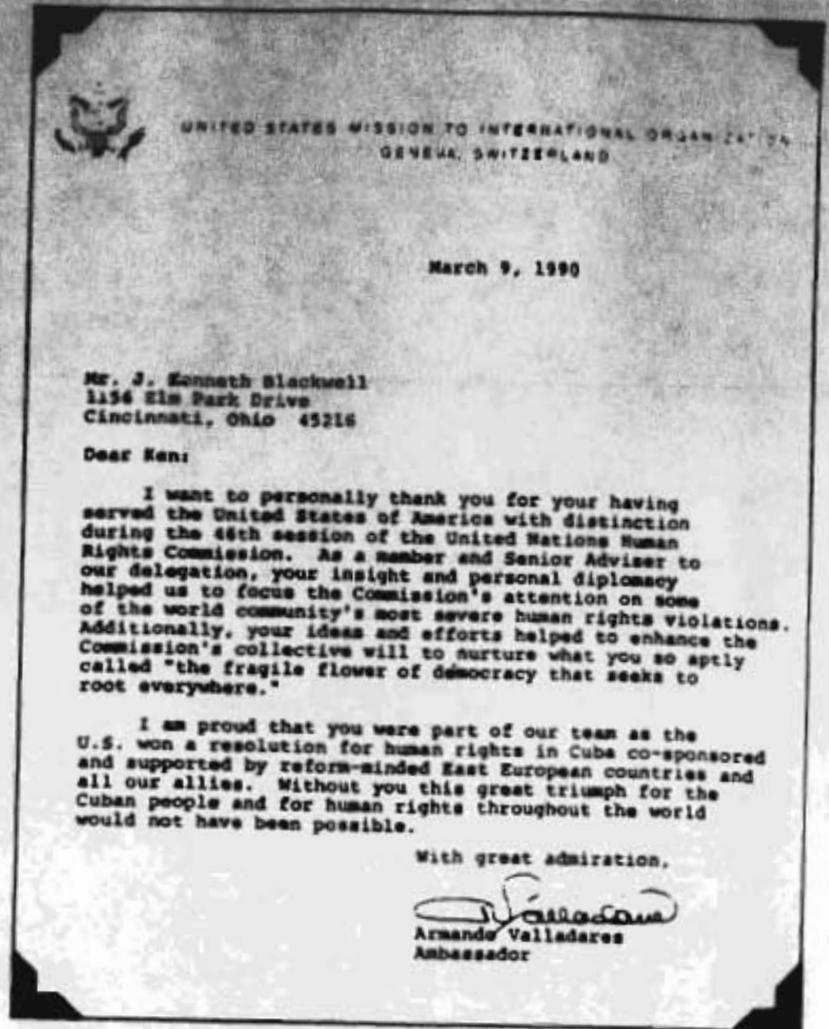
My wife Rosa now. I'm very proud of her. She's the principal of our old high school, Hughes.



I was the Senior Advisor to Ambassador Armando Valladares at the 46th Session of the U.N. Human Rights Commission in Geneva, Switzerland and I was very gratified by the letter he wrote about my role in securing the first condemnation of Cuban violations ever passed by this body.



Below with Enrique Bermudez, the leader of the Nicaraguan Freedom Fighters. Since this was taken in 1988, free elections have thrown out the communist Sandinista regime. I've been going to Central America since 1981 in hopes of helping to produce triumphs for democracy like this one.



With our youngest, Kristen,
at the White House.



My wife Rose and our three children
Kim, Katelynn and Kristen at the first
house we bought 19 years ago.
Thanks for looking through this get-
acquainted album. As you know my
qualifications and positions during
the campaign, I hope you'll decide
that I'm the right person to represent you and your family in Congress.

Sincerely, Ken Blackwell

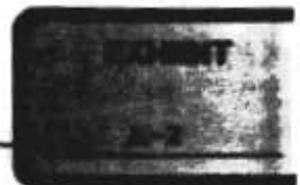
21040343

1980

Sign In Please!

NAME	ADDRESS & PHONE	ACTIVITY
Louise Muehlend	77 78 ... 825-5323	Brochure Stamp
John Muehlend	9798 ... 825-5363	"
Frank	
Fin 525-7215	
William Orr	1095 Albany Ave 681-2032	
John ...	9756 ... 825-5323	
John ...	5656 Midford St 722-2727	"
Margaret Chiles	4037 Gaddes Rd 45229 281-7110	Stamp
Ann Cooper	1153 Winton Ave	Brochure Stamp
Renee Head	4501 ... Rd	Stamping
Lisa Friedman	1013 St Gregory 579-5533	
Mary Russell	2499 ... Is 729-0685	
Mary Ferguson	6751 ... Dr 791-8078	Brochure Stamp
Mary Alice ...	33 ... Lane	Brochure Stamp
Paul ...	260 Crane Ave 281-1815	Stamping
Horace ...	563 Grandin Av. 825-7249	Brochure Stamp
Ann ...	5782 Belmont Ave. 591-1034	Stamping
Ray ...	373 Aspen Way 881-8020	Stamping
Cindy ...	2623 Willowmeir CT 385-2599	mail
Bro. Joe	2708 ... 961-6244	Stamping
Evelyn McCullough	7714 Compton Lake Dr 522-2055	

BY



Sign In Please!

NAME	ADDRESS & PHONE	ACTIVITY
Pearl Blackwell	11375 Fremont Ave 825-6225	Stamping
Carilyn Achenow	3480 Jessup Rd	Whiter!
Virginia Frost	6426 Orleans Ct.	Brochure Stamp
Florida Moses	5112 North Bond Rd 661-0718	Stamping
Mary Gliche	12091 Heronstone Court 851-5909	Stamping
Angela M. Lange	2109 Harrison Ave 662-5911	
Wilbur D. Jones	3965 Ardmore 861-4125	Stamping
BRIAN KNAB	5990 Day Rd.	Stamping
Andy Bannin	4121 FLAMINGO W 522-4726	Stamping
Ben Lighthall	5058 Jessup Rd 903-3809	Stamping
Mordant Ligon	10639 Pottinger 951-4919	Stamping
Nancy Vek	1704 Cedar 681-6393	Brochures
Robert J. Vek	1704 Cedar 681-6393	Brochures
Joe Storgston	2801 Queen City 541-4665	Stamping Broch
Deborah Manning	506 Viningwood Dr 981-9112	mailing
Penny Guffly	8642 OCASTA (ii) 661-0986	mailing
Jane K...	264 Tolson 741-9211	mailing
Rita ...	542 Elvin Lane 867-9504	Stamping Broch
...	518 Harrison 522-1034	Stamping Broch
James Garvin	2854 Kern Ave 751-1568	Stamping Broch
John L. Cox	2610 Monette Ct 931-4405	Stamping Broch

BY _____

Sign In Please!

NAME	ADDRESS & PHONE	ACTIVITY
<i>[Handwritten Name]</i>	1153 Wionna Ave (081-4546)	Brochure Mail
Alma Hackett	9075 Chambers Ln	brochures
Sue Bess	4714 North ¹¹³⁰ Highway ³⁰²⁴	" "
Mary Ann	3374 Paces Ct.	Brochure Mail
[Handwritten Name]	3970 Hawley Rd.	Stamping
Nick Bala	6573 Dalewood Rd	Stamping
Jane K. G.	3264 Islander Ln	Brochure Mail
Deborah Ellison	3041 Summit Ave	" "
Judy McMahon	3448 Pungwood Ln	Stamping
Curtis McKinney Jr	2160 Crane Ave. 281-1813	Stamping
Maureen Henry	1226 Bates Ave. 41225 591-0348	" "
Betty Charlotte Lee	5708 Johnston Rd 961-1254	Stamping
Judith M. Mott	7409 South Pointe Dr 54253	Stamping
Ann B. B.	2033 Weyer Ave 7510130	941-0161 Brochure Stamp
Holly Kaula	5990 Wood Rd 988-0574	Brochure Stamp
Angie Lebel	5174 South Rd 741-3785	Brochure Stamp
Jan [Redacted]	8163 Goda Ave 661-1818	BROCHURE STAMP
Mona [Redacted]	2659 Parkinger Rd 951-4919	Brochure Stamp
Lorraine [Redacted]	2809 [Redacted] 5425220	BROCHURE STAMP
Theresa Maurer	10302 Peabody Ln 907-8500	Stamping
TERI WEBB	2028 North Blvd 45239	BROCHURE STAMP

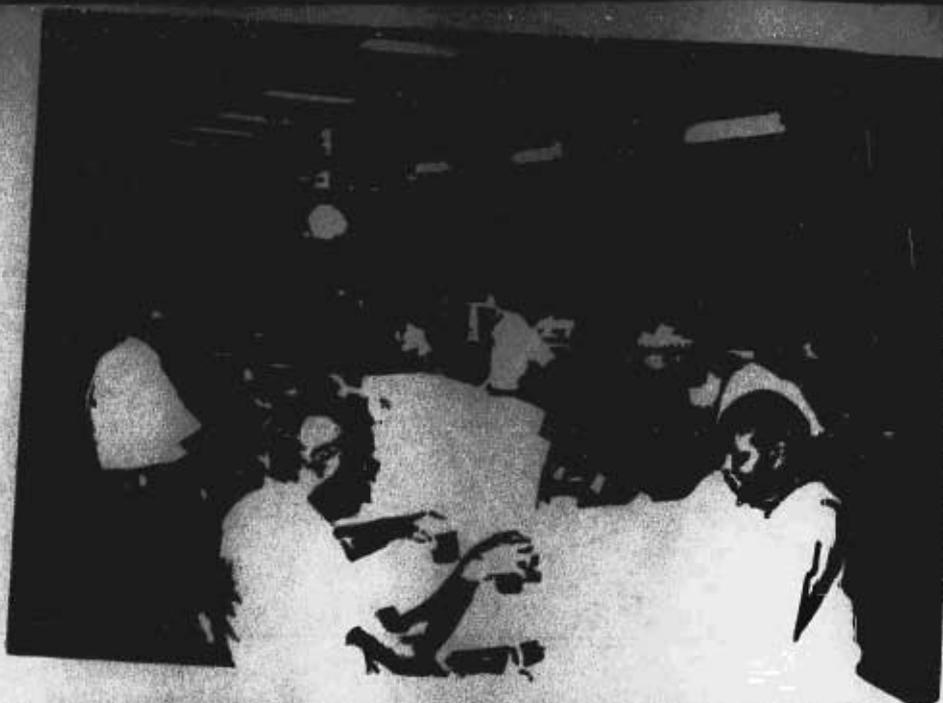
BY _____

Sign In Please!

NAME	ADDRESS & PHONE	ACTIVITY
Ann Cooper	1153 Vienna Ave 681-4540	Brochure Stamping
Frank Toth	9776 Manhattan 825-7215	Brochure Stamping
Cynthia McKinney	2160 Crane Ave 281-1813	Stamp
John Thomas	5656 Midforest 922-2727	"
Regie Reed	4821 Reading Rd 242-4034	"
Mary Gliche	12091 Frontone 851-5309	"
Roy Kling	1373 Aspen Way 681-8620	"
Let's Jones	5596 Sidney 922-9424	"
Don Jorrell	5596 Sidney 922-9424	"
Chonda Mason	5172 North Bend 661-0718	"
Duke Adams	328 Queens Ave 821-2525	"
Mary Carr	3374 Rodas Ct. 48-3841	"
Julius Thompson	2057 N Grand Rd 681-1755	
LARRY ROWE	5160 Broadway Ave 984-1112	
Bradley	2758 Chestnut St. 961-6294	
Angela M. Lane	2109 Harrison Ave #14 162-5971	
Judy M. [REDACTED]	48 [REDACTED] 741-2773	"

BY _____

91040843392



EXHIBIT

A-3

91040843393



9 1 0 4 0 8 4 3 3 9 4



91040843395



91040843396



Charlie Luken's Record on Taxes:

SUPPORTED CELESTE 90% TAX INCREASE

Charlie Luken was against repealing one of the largest state tax increases in Ohio history. This increase is still costing a typical First District family over \$400 each year.

SUPPORTED 15% EARNINGS TAX INCREASE

Charlie voted for a 15% increase in Cincinnati's earnings tax.

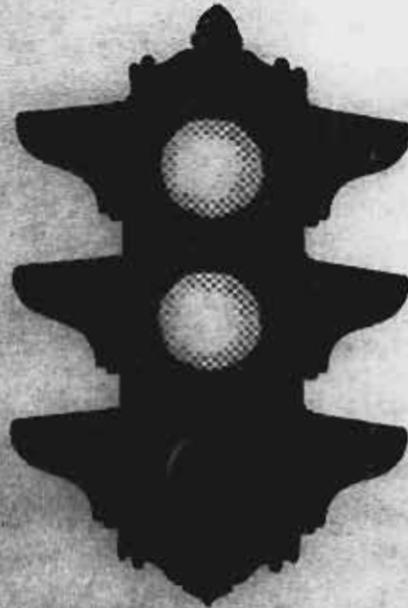
SUPPORTED 12% WATER RATE INCREASE

OPPOSED EFFORT TO MAKE IT HARDER FOR THE STATE GOVERNMENT TO RAISE TAXES

Charlie Luken opposed requiring that any future state tax increase be approved by 80% of Ohio state legislators (instead of a simple majority).

With his record
on taxes, what do
you suppose
Charlie Luken
would do as a
member of the
Tax-and-Spend
Majority in
Washington?

GO



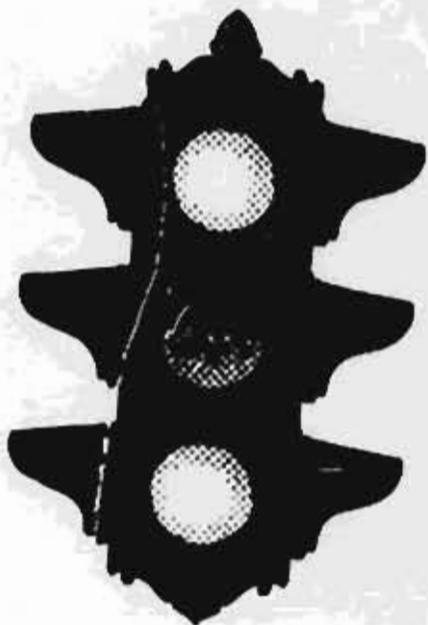
Vote for
Ken Blackwell
for Congress...you
know where he
stands.



9 1 0 4 0 8 4 3 3 9 7

9 1 0 4 0 8 4 3 3 9 8

CAUTION



**Please be sure to read
Charlie Luken's record
on taxes.**

Printed by the Ohio Republican Party

CAR-RT SORT
DAGONYL JOHNSON
1512 BIRLEY WALKER ST
CINCINNATI OH 45214
CR 70

Ohio Republican Party
172 E. State Street
Columbus, Ohio 43215

STOP



**Think for a moment
about the way taxes hit
your family's budget...**

Sign

NAME	ADDRESS & PHONE	ACTIVITY
Elmer Grant	119 12th Ave Wiggins 45205	Stamping
Bro. Joe Choquette	2768 Johnstone Pl. 45206	"
Robert B. Skelley	6622 Daley Road Cincinnati 45224	"
Don Fancee	5596 Seiny Cinti 45238	"
Keta Fancee	5596 Seiny Cinti 45238	"
Jack Bradton	2808 Sturtevant Cinti 45204	"
Cheryl Cooper	1153 Wionna Ave. Cinti 45224	BROCHURE STAMPING
Andrew Thompson	2057 N. Grand Rd	mail - stamping
John Stimmer	5656 Midforest 922-2727	"
Pat Martin	2975 Lecky 662-5473	"
Helena R. Miller	4007 Deane Ave 574-4842	"
Charlotte Hunter	1587 Lenoxton Dr 857-5214	mailing
OTVA BROWN	1169 Wionna 542-9082	mailing - stamping
Tammy Flannery	9681 Long Lyle Dr 857-5485	Stamping
Janet Kay Day	3264 Dalton 741-9621	Stamping
W T MARTIN	331 Ardora 761-1874	Stamping
Judy McMahon	3448 Rangier 744-7773	Stamping
John S. Denton	5662 Repif Road 8 922-6900	Stamping
Robin Muehlenberg	9798 Manhattan 825-5363	Stamping
Bob Muehlenberg	8798 ^{Cinti 45251} Manhattan 825-5363	Stamping
Melba Donovan	4124 Westwood Northern 574-8881	Stamping

BY 

Sign

NAME	ADDRESS & PHONE	ACTIVITY
Joyce Krause	715 Evangeline Rd 45240	Stamping
Quelby Pugh	815 Eastman Ave 45240	Stamping
James Bruckman	579a Belmont Avenue 45224 5917034	Stamping
Alva Goodman	3460 Davis Ln 45137 551-244	Stamping
Mary Wolf	7972 Stillme LL Rd 944-1716	Stamping
Mary C. Royal	1728 Race St 381-6225 051-5821	Stamping
Wanda J. Anderson	248 Gilman Ave 45219	Stamping
o. FREY	9310 HARRISON AVE 553-2528	Stamping
Wm Flannery	9681 Lorakinda Dr	Stamping
Benett Cooper	1153 Wierma Ave,	Stamping
Patricia Davis	4880 Winton Rd #4 45232	Stamping
Harold E. Mains	10308 Peachtree Ln. 45242	Stamping
Rev. James Crawford	2356 Auburn Ave #2 45219	Stamping
Christine Davis	529 Rockdale Ave 45239	Stamping
Rev. J. Blackwell	532 Rockdale Ave 45229	Stamping
Annie Meyer	145 Woelper 45220	Stamping
Genny Wilson	555 Cliff Dr. N.B 45052	Stamping
Ray B. [unclear]	959 Francis Ave 45224	Stamping
Patricia [unclear]	2819 McKimley Ave 45211	Stamping
Bernie Dempster	2732 McKimley Ave 45211	Stamping
James [unclear]	2354 Vera Ave	Stamping

2 14

BY _____

020 4/2/72

Sign

NAME	ADDRESS & PHONE	ACTIVITY
Clark Cooper	1153 Victoria Ave / 691-4522	Stamping
Dorothy Lindsay	1916 Goodman Ave.	"
Don Farrell	5576 Sidway Rd	"
Kate Farrell	5576 Sidway Rd	"
Mary Ann	3374 Raped Del.	"
John Henry	5656 Midforest 722-2727	
Bro. Joe Choquette	M 2208 Johnstone, 961-6249	"
Joseph Diamond	563 Grandin St Spade 41246	"
Resmond W. Hut	4821 Redwing Rd 45235	"
Joe M. Blair	1169 Wilcox Ave 45224	"
Jack Hill	1714 Dallas Ave 45231	"
John C. Scamlow	5622 Rapid Run Rd #5 Riv. OH 922-6500	"
Pearl Blackwell	11373 Fremont Ave 825-6283	
ROSENA L. PORTER	3336 TRIMBLE 45207	
Judy McMahon	3448 Ringwood Dr 45239	"
Vi Ely L. Ferguson	6750 Elwyn Dr 791-8098 45236	"
Yvonne Boyd	209E Halliwell Rd.	"
Annastasia Karas	6517 Vine St.	"
Paul Hegemas	9613 CRESTBROOK DR 45231 971-0563	"
Franklin Mysonline	2055 Cliff Rd 45052	Stamping
Scott Ferris	878 Fenwick St 45230	Stamping

BY _____

Sign

NAME	ADDRESS & PHONE	ACTIVITY
Troy Rekart	950 Grand Ave 931-8801	Stamping
Robert Thompson	2052 N. Grand Ave	Stamping
Joy Crosby	1141 Elm Park Dr	Stamping
Christine Davis	529 Rockdale	Stamping
Jellen W. Grady	1085 Windsor	Stamping
Debbie Clark	3137 Laverne Dr	Stamping
Dee Hammond	2637 Royal Hill	Stamping
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3		
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3		
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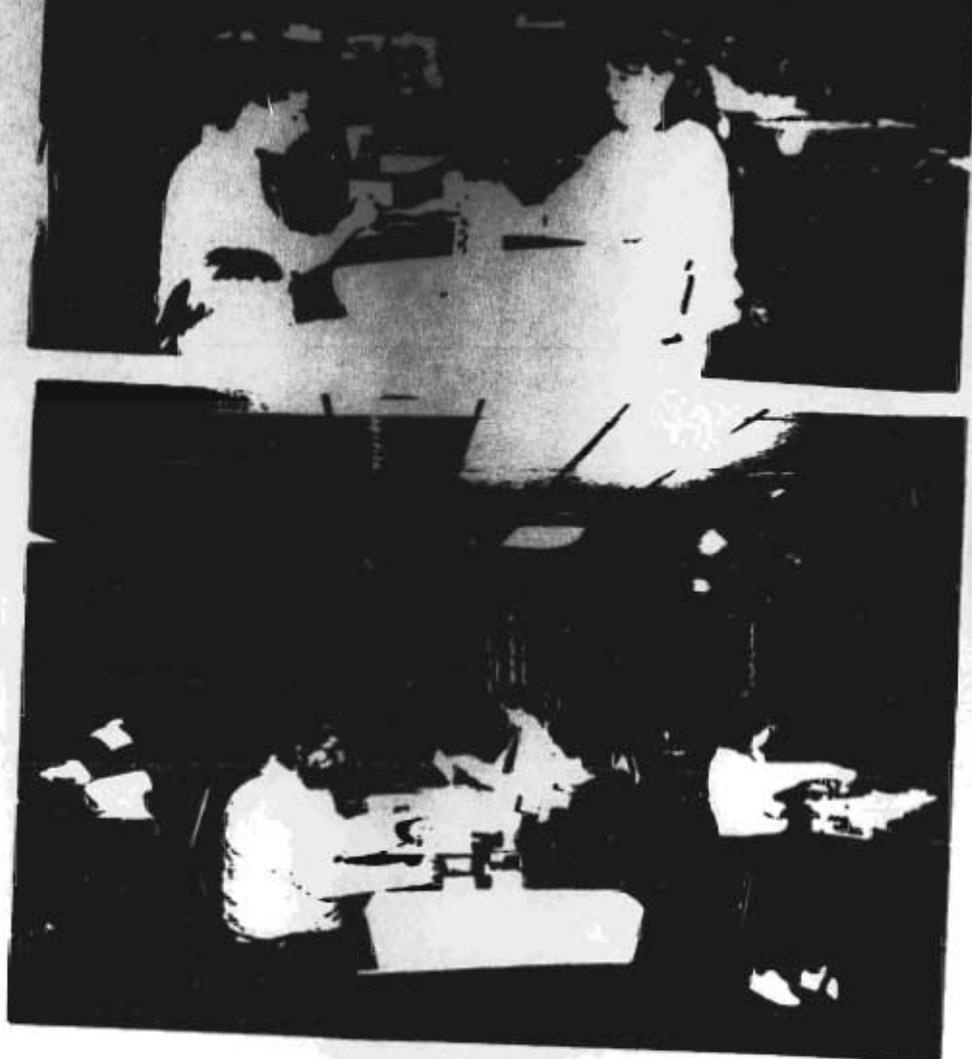


EXHIBIT
B-3

What I Did On My Summer Vacation

I worked with my Dad all summer. He is running for Congress. We worked so hard every day. We went so many places and met a lot of people. They were very nice to us. I really liked going to all the festivals and parades. I made a lot of new friends. I had so much fun working with my Dad.

Kristin
Blackwell

Ohio Republican Party
172 E. State Street
Columbus, OH 43215

91040343405

EXHIBIT

C-1

Printed by the Ohio Republican Party

"The choice is clear. The First District, the nation and my administration need Ken Blackwell in Congress."

— President George Bush

Ken Blackwell's record, a decade of effort on behalf of families.

- Led effort to defeat school based "sex clinics" in Cincinnati schools. October, 1986.
- Led effort to ban sexually explicit cable programming. May, 1983.
- Supported legislation to make it illegal for parents to allow minors to consume alcohol or illicit drugs. May-June, 1986.
- Led effort to prohibit display of sexually explicit magazines to juveniles. February, 1984.
- Led effort to disclaim city support of the "Sister Mary Ignatius Explains It All for You" theatrical production, condemned as offensive and insulting to Catholics by Archbishop Pilarczyk. September, 1984.
- Led effort to proclaim January 22 as Right-to-Life Day in Cincinnati. January, 1984.
- Introduced legislation requiring the notification of parents of minors seeking abortions. 1980.

KEN BLACKWELL

leading the way
to protect
American values
and preserve
family values



I support the Blackwell for Congress
because of his dedication to life, family
values.
The Cooper Family - Colby Hill



It is a great honor for Mr. Blackwell
his children, my daughter Lisa
married to a great man - Ken
The Cooper Family - Colby Hill



Ken Blackwell is right when he
says parents should stay right
& listen when to vote their children
& school. We support Ken
because we support Ken.
The Blackwells - Colby Hill



Ken has the confidence
of the House of Representatives
TV all of us appreciate his
children already on stage after
on TV
The Cooper Family - Colby Hill



Because of Ken, we did not to worry
about what anyone says. They love
Ken in the way of someone who
The Cooper Family - Colby Hill



It is a great honor for Ken to be
to lead the fight against LGBTQ
officers of our country. He is
right!
The Cooper Family - Colby Hill

My wife Rosa and
our three children
at our first district
home. We'd been
married three years
when we bought
this home in 1971.
Our oldest child
Kimberly is going into
her junior year at
Lyonsville University.
Our son Rakeshaan
is a junior at Walnut Hills High School. Our youngest,
Kristen, is in the fourth grade. I hope to have an
opportunity to meet you and your family sometime soon.



This is me
Kristen

Sincerely, Ken

Blackwell for Congress

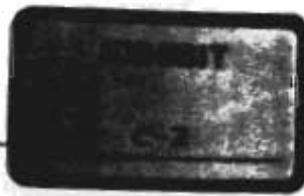
91040843406

Date 10/18/98

Sign

NAME	ADDRESS & PHONE	ACTIVITY
John Stearns	556 N. West Rd. 2727	ADDRESSING/STUFFING
Bill Van Klee	2694 HAYLER RD. 215 3133	"
Cindy Buchler	8023 Willowview Ct. 385 2594	"
Maury Carr	3374 Rodeo 481-3841	"
Al Carr	3374 Rodeo CT 481-3841	"
Leo Lee	2721 W. J. Dr. 215 761-2247	"
Robert Thompson	205 N. Bond Rd	MAIL
Adam L. Ehrhardt	4494 Running Fern Dr. 574-4762	addressing / stuffing
Rebecca BROWNING	8161 W. West Rd ^{unit} ON 385-8328	addressing / stuffing
Rosemary Reif	613-6523	"
BRIAN KNAB	5990 Day Rd 385-8112	"
Ben Lightwell	5058 Jessup Rd. 813-3909	"
Shad Miller	6680 W. Farmacia 531-6112	Stamping
James Bowley	4660 Rapid Run #12 244-6219	
Van Lee	9310 HARRISON AVE 953-2528	
Betty Jane Bowley	5725 Dunlap, 385-6125	mailing

BY _____



Sign

NAME	ADDRESS & PHONE	ACTIVITY
Joyce Krause	715 Evangeline Rd 45240	Stamping
Elizabeth Ruff	815 Eastview Ave 45240	Stamping
James Bruckmann	5782 Belmont Avenue 45234 5917034	Stamping
Alva Goodnow	3460 Davis Ln 45127 531-244	Stamping
Mary Wolf	7972 Stillwell Ln Rd 948-1716	Stamping
Mary C. Royal	1728 Rose St 381-6225 45217	Stamping
Wanda J. Anderson	248 Gilman Ave 45219	Stamping
Wm. J. Frey	9310 Harrison Ave 553-2528	Stamping
Ray Flannery	9681 Lorakinda Dr	Stamping
Benett Cooper	1153 Wierda Ave	Stamping
Patricia Davis	4880 Winton Rd #4 45232	Stamping
Harold E. Mains	10308 Peachtree Ln. 45242	Stamping
Wm. James Crawford	2356 Auburn Ave #2 45219	Stamping
Christine Davis	529 Rockdale Ave 45239	Stamping
Ray & Blanche	532 Rockdale Ave 45239	Stamping
Eunice Meyer	145 Woolper 45220	Stamping
Jenny Morrison	555 Cliff Rd. N.B. 45252	Stamping
Ray B. Ford	959 Francis Ave 45224	Stamping
Belle B. Baker	2819 McCarley Ave 45211	Stamping
Bernie Dempster	2732 McKinley Ave 45211 662-0930	Stamping
Joyce [unclear]	2354 Wagoner	Stamping

114

BY _____

Date 4/26/70

Sign

NAME	ADDRESS & PHONE	ACTIVITY
✓ Conrad Cooper	1153 Vienna Ave 691-4520	Stamping
Wootley Lindsay*	1916 Goodman Ave.	"
Don Farnell	5596 Sidney Rd	"
Kate Farnell	5596 Sidney Rd	"
Mary Ann	3374 Ropes Pl.	"
John Thomas	5656 Midforest 922-2727	
Bro. Joe Choquett	M. 2208 Johnson Ave. 961-6240	"
✓ Harold Diamond *	563 Grandin St Spdale 45246	"
✓ Kenneth W. Hut	4821 Reading Rd 45235	"
✓ Joe M. Blawie	1169 Wilcox Ave 45224	"
✓ Dan [unclear]	1714 Dallas Ave 45231	"
✓ John C. Scoulow	5662 Rapid Run Rd #8 Riv. OH 922-6800	"
○ Pearl Blackwell Lewis	11373 Freemantle 820-6283	"
✓ ROSENA L. PORTER*	3336 TRIMBLE 45207	
Judy McMahon	3448 Ringwood Ln 45239	"
✓ Mary L. Ferguson	6750 Clarymont Dr 791-8098 45236	"
Yvonne Byrd	209E Hallcraft Rd.	"
✓ Annastasia Lakaris	4517 Vine St.	"
Paul & Margaret	9613 CRESTBROOK DR 45231 471-0569	"
✓ Jennifer Mysonline	2655 Cliff Rd 45052	Stamping
✓ Scott Francis	878 Fenchurch Ct 45230	Stamping

BY _____

Sign

NAME	ADDRESS & PHONE	ACTIVITY
Elmer Strunk	119 Arch Ave Waring, Ok 45015	Stamping
Bo. Joe. Chromette, Sr.	2708 Johnston Pl. 45206	"
Barry B. Skully	6622 Day and Cinti 45224	"
Don Farrell	5596 Sidney Cinti 45238	"
Kate Farrell	5596 Sidney Cinti 45238	"
Maie Sheadon	2908 Stewart Cinti 45204	"
Annal Cooper	1153 Vienna Ave Cinti 45-224	Brochure stamping
Robert Thompson	2057 N. Broad Rd	Mail stamping
John Stommer	5656 Midforest 922-2727	"
Pat Mason	2975 Lecker 662-5473	"
Helma R. Miller	4007 Dew Ave 574-4842	"
Charlotte Y Hunter	1587 Lenox Ave Dr 857-5214	mailing
OT VA BROWN	1169 Vienna 543-9082	mailing-stamping
Jane Flanagan	9681 Long Lyle Dr 857-5485	Stamping
Janet M. G. G.	3264 Dalton 741-9621	Stamping
W T MARTIN	331 Ardour 761-1974	Stamping
Judy McMahon	3448 Rensselaer 741-7773	Stamping
John S. Stanton	5662 Repit Court 8 922-6800	Stamping
Reine Muehlenberg	9798 Manhattan 825-5363	Stamping
Bob Muehlenberg	9798 Manhattan 825-5363	Stamping
Melvin Donovan	4124 Westwood Northern 574-8891	Stamping

Sign

NAME	ADDRESS & PHONE	ACTIVITY
Mary Carr	3374 Rovea	
John Stearns	5656 Midforest	
Charlotte Hunter	1587 Leontyne	mailing
Debi Moore	778 Rock Lake	
Andrew Ferguson	2067 N. Band Rd.	mail
Peggie Head		DELIVERY
Carolyn Ackman	3480 Jersey Pl	MAILING
- Ann Mc Day	5137 Sumner Ave.	
- Elmer Barthel	8248 Woodbine Ave	
↳ Linda Barthel	"	
John Beaulon	5162 Ruffed Grouse Rd. # 8 5296	MAILING
Peter McCoy	6541 Teakwood Ct.	MAILING
Scott & Linda	53 Bluegrass 41075	photographed
Mary Ferguson	6750 Chrysmine Dr 791-8098	folding & stuffing
Ernie Dickey	7756 Concord Hills 944-6436	
Jay Flannery	9681 Laura Linda Dr	851-5495
Lane Flannery	" " "	" " "
Debbie Dillon	117 E Collins Oxford Oh 523-9230	
Paula Smith-Goodson	" " "	
Julie Burt	" " "	
Katie Dillon	252 Emerson Oxford Oh 529-3589	

Sign

NAME	ADDRESS & PHONE	ACTIVITY
Yana Fleming	9681 Lora Linda Dr 850-5485	Stamping
Nolan C. Scauler	5662 Rapid Run Rd 45238 441-6500 442-3084	STAMPING
Mrs. L. Ferguson	6750 Chesapeake Dr 791-8098	"
Ernie Dickey	7756 Concord Hills 944-6436	"
Mary Fugge	266 Seward Rd 922-4939	
WT MARTIN	331 Arden Lane 761-7874 45315	Mailing
Joe Schubert	830 Redmill Dr. 521-4452	M
Andrew Rachmil	3553 Primle Dr. 521-6457	Mailing
Jon Fryer	9310 Harrison Ave 555-2528	Mailing
Cherie Frazier	165 Maple Ave 961-1150	Mailing
Andrew Thompson	2057 St. Bernard Rd	LI
Alton E. Elin	3040 Junette Ave	"
Paul Meszner	9613 CRESTBROOK DR 931-8862	
Jay Flannery	9681 LORALINDA DR.	Stamping
Fred Demeropolis	6576 Springdale Rd	Trucking
Ted Blank	959 Forestal 931-8891	
JAMES CARIN	2354 Vega Ave	whatever
James Bruckmann	5782 Belmont Avenue	Whatever

BY _____

91040843413



EXHIBIT

C-3

91040843414



91040843415



SENSITIVE

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

FIRST GENERAL COUNSEL'S REPORT

MUR 3218
DATE COMPLAINT RECEIVED
BY OGC: January 25, 1991
DATE OF NOTIFICATION TO
RESPONDENTS: January 28, 1991
STAFF MEMBERS: George Rishel
Jeffrey Long

91 APR 15 AM 11:34

RECEIVED
FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S OFFICE

COMPLAINANT:

Paul Sylvester, Treasurer
Luken for Congress Committee

RESPONDENTS:

Blackwell for Congress Committee and
Donald C. Auberger, as treasurer

Ohio Republican Party Federal
Candidates Committee and Virginia S.
Cheney, as treasurer

National Republican Congressional
Committee-Expenditures and Jack
McDonald, as treasurer

RELEVANT STATUTES:

- 2 U.S.C. § 431(8)(B)(x)
- 2 U.S.C. § 4341(9)(B)(viii)
- 2 U.S.C. § 434(b)
- 2 U.S.C. § 441a
- 11 C.F.R. § 100.7(a)(1)(iii)
- 11 C.F.R. § 100.7(b)(15)
- 11 C.F.R. § 100.8(b)(16)
- 11 C.F.R. § 104.13
- 11 C.F.R. § 106.1
- 11 C.F.R. § 110.7

INTERNAL REPORTS CHECKED:

Disclosure Reports

FEDERAL AGENCIES CHECKED:

None

I. GENERATION OF MATTER

This matter was generated by a complaint filed on January 25, 1991, by Paul Sylvester, treasurer of the Luken for Congress Committee, against the Blackwell for Congress Committee and Donald C. Auberger, as treasurer, ("Blackwell Committee"); the

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Ohio Republican Party Federal Candidates Committee and Virginia S. Cheney, as treasurer ("State Party"); and the National Republican Congressional Committee-Expenditures and Jack McDonald, as treasurer ("NRCC"). Responses were filed by the NRCC on February 15, 1991; by the State Party on March 6, 1991; and by the Blackwell Committee on March 18, 1991.

The complaint alleges that the Blackwell Committee received excessive coordinated party expenditures in the form of mass mailings by the State Party and in-kind services by the NRCC. Charles Luken and Ken Blackwell were the Democratic and Republican Party's respective nominees for the U.S. House of Representatives in the First Congressional District of Ohio in the 1990 general election. Luken won the election by a vote of 82,992 to 79,807 or 51 percent to 49 percent.

II. FACTUAL AND LEGAL ANALYSIS

A. The Act and Regulations

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that no multicandidate political committee shall make contributions to any federal candidate that aggregate in excess of \$5,000 per election. 2 U.S.C. § 441a(a)(2)(A). The Act defines contribution to include any gift of money, services or anything of value made for the purpose of influencing any federal election. 2 U.S.C. § 431(8)(A)(i). Commission regulations explain that "anything of value" includes any in-kind contribution or any gift of goods or services at less than the usual and normal charge for such goods or services. 11 C.F.R. §100.7(a)(1)(iii).

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The Act also provides the national party committee and the state party committee with additional authority to make coordinated party expenditures on behalf of the party's nominees for the House and Senate. 2 U.S.C. § 441a(d)(3). The national party committee may also make such expenditures on behalf of its presidential nominee. 2 U.S.C. § 441a(d)(2). The national and state political party committees may authorize another committee, such as the National Republican Congressional Committee, to make these coordinated party expenditures. DSCC v. FEC, 454 U.S. 27 (1980). The Act further provides that no political committee shall make any expenditure in violation of the provisions of Section 441a. 2 U.S.C. § 441a(f).

Commission regulations explain that expenditures made on behalf of more than one candidate shall be attributed to each candidate in proportion to the benefit reasonably expected to be derived and shall be so reported. 11 C.F.R. § 106.1(a). The regulations further explain that an authorized expenditure made by a candidate or political committee on behalf of another candidate shall be reported as a contribution in-kind to the candidate on whose behalf the expenditure was made, except that expenditures made by party committees pursuant to § 110.7 need only be reported as an expenditure. 11 C.F.R. § 106.1(b). Thus, coordinated party expenditures are reportable as such by the party committee making them, but are not reportable by the authorized committee of the candidate on whose behalf they are made.

The Act also exempts from the definition of contribution or

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expenditure certain payments by state and local political party committees on behalf of its candidates. These exempt payments include the payments for campaign materials, such as pins, bumper stickers, handbills, brochures, posters, yard signs, and party tabloids used in connection with volunteer activities. 2 U.S.C. § 431(8)(B)(x). Payments for such activities in connection with any broadcasting, newspaper, magazine, billboard, direct mail, or similar type of general public communication or political advertising do not qualify for these exemptions. 11 C.F.R. § 100.7(b)(15)(i). For these purposes, direct mail means any mailing by a commercial vendor or any mailing made from commercial lists. Instead, such materials must be distributed by volunteers and not by commercial or for-profit operations. 11 C.F.R. § 100.7(b)(15)(iv). Moreover, payments for campaign materials made from transfers from a national party committee donated for the purchase of such materials will also not qualify for the exemption. Instead, such payments are treated as coordinated party expenditures. See 11 C.F.R. § 100.7(b)(15)(vii). For purposes of this section, payments by the party organization for travel and subsistence or customary token payments to volunteers do not remove such individuals from the volunteer category. These payments for such exempt materials, if made by a political committee, shall be reported as disbursements by the party committee making them and need not be allocated to specific candidates. 11 C.F.R. § 100.7(b)(15)(v).

The House Report for the 1979 amendments to the Act, which discussed the exemptions described in 2 U.S.C. § 431, stated that

the purpose of that section is "to encourage volunteers to work for and with local and state political party organizations." The test to determine whether an activity qualifies for the volunteer exemption requires an examination of how the campaign materials are used and by whom. The Report stated further that the provision "excludes all public communications or political advertising," and the mere purchase of campaign materials described in Section 431 does not mean their costs are exempt. Essentially, those same materials must be distributed by volunteers. 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 193 (GPO 1983). In presenting the proposed amendments to the Act to the U.S. House of Representatives, Representative Thompson said:

The new provision pertaining to political parties allow a State or local committee of a political party to purchase, without limit, campaign materials used in connection with volunteer activities on behalf of a candidate -- such as buttons, bumper stickers, and yard signs. This exemption will not apply to costs incurred for media advertising or mass mailings -- activities of this type would be subject to the contribution and expenditure limitations of the Act.

125 Cong. Rec. H23813 (daily ed. September 10, 1979)(statement of Rep. Thompson), reprinted in FEC Legislative History of Federal Election Campaign Act Amendments of 1979 at 444 (GPO 1983).

In MUR 2377, a majority of the Commission issued a Statement of Reasons concluding that the scope of volunteer involvement in the subject activities satisfied the Act's requirements that the campaign materials be used in connection with volunteer activity. The Statement noted that the evidence before the Commission

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indicated that the role of commercial vendors in distributing the materials was limited to printing and shipping the materials to the party and assisting in the payment to the post office. It further noted that volunteers were used extensively in preparing the 298,000 mail pieces for distribution: unpackaging, labeling, sorting by zip code, bundling by carrier route, and delivering to the post office. In NUR 2559, however, the Commission concluded that the participation of the volunteers did not meet the requirements of the Act. In this matter, the volunteers merely stamped nonprofit mail seals and repackaged the brochures and sent them back to the commercial vendor for labeling, sorting by carrier route, tying, sacking, and delivery to the post office. In NUR 2288, the Commission reached a similar conclusion where the evidence indicated that the volunteers merely applied a mail seal to the printed material with all other functions being performed by a commercial vendor.

B. Issues in NUR 3218

The complaint alleges that the Ohio Republican Party made excessive coordinated party expenditures on behalf of the Blackwell campaign in 1990 by its payments for the mailing of brochures on behalf of the Blackwell campaign. The complaint also alleges that the NRCC made excessive coordinated party expenditures by providing media services, consulting services, research work, and national staff support to the Blackwell campaign. In turn, the complaint further alleges that the Blackwell Committee has accepted excessive coordinated party expenditures.

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For 1990, the aggregate coordinated party expenditure limitation for candidates for the U.S. House of Representatives (RNC and state party together) was \$50,280. Furthermore, coordinated party expenditures are not reportable by the authorized committee of the candidate on whose behalf they are made. Accordingly, the Commission has not made findings against the authorized committee of such candidate when a party committee exceeds its coordinated party expenditure limitation. See, e.g., MUR 2461 and 2559. Therefore, even if it is concluded that the State Party and the NRCC made excessive coordinated party expenditures on behalf of the Blackwell campaign, such a conclusion would not result in a finding the Blackwell Committee has accepted such excessive expenditures. Accordingly, we recommend that the Commission find no reason to believe the Blackwell Committee violated any provision of the Act on the basis of the complaint in MUR 3218.

C. Volunteer Activity by the State Party

The complaint alleges that the Ohio Republican Party spent an estimated \$70,000 to print and mail brochures on behalf of the Blackwell campaign to more than 100,000 households in the First Congressional District. The complainant states that it is his understanding that when a state party mails materials promoting a candidate, the design and printing of that material must be solely that of the state party. The complainant then alleges that one of the brochures was designed by the Blackwell Committee and distributed by it prior to the mailing by the State Party.

Attached to the complaint were photocopies of three

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brochures. One brochure compared Charles Lukens and Ken Blackwell on taxes and used the labels of "Stop Caution Go" and carried a disclaimer that it was paid for by the Ohio Republican Party. The second brochure contained a one page album of Blackwell family photographs with handwritten captions including a handwritten note from the candidate's daughter. The brochure detailed Blackwell's record on families and also carried a disclaimer that it was paid for by the Ohio Republican Party. The third brochure consisted of a multi-page album of photographs of Ken Blackwell and his family in a variety of personal and professional situations also with handwritten captions. It carried a disclaimer that it was paid for by the Ohio Republican Party. The complainant alleged that this brochure was the same as one distributed by the Blackwell for Congress committee.

The response from the Ohio Republican Party includes three affidavits. The first affidavit is from Vada Hill, campaign manager for the Blackwell campaign. He states that in that capacity he was responsible for obtaining volunteers and overseeing their efforts in the campaign, including their role in the subject mailings for the Ohio Republican Party, which paid for them. He describes the multi-page family album brochure as an "edited" version of material previously prepared by the Blackwell Committee.¹ He adds that the three pieces were

1. The affidavit from Vada Hill also suggests that the copy of this brochure attached to the complaint was not an entirely accurate one. This Office has re-examined both the original complaint, which had only a photocopy of this brochure, and the original brochure submitted as part of the response. We have concluded that there does not appear to be any deliberate attempt

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prepared at the cost of the State Party and delivered to the Blackwell Committee "already printed and addressed." He adds that the list of addresses was purchased from the State Party at its cost to reproduce them and was compiled from voter lists available to any person from the Hamilton County Board of Elections. He states that the list was not purchased from any commercial mail order house or other commercial firm and was the property of the Blackwell Committee.

Hill further states that at the Blackwell headquarters, volunteers "opened the cartons and stamped on each piece, individually, the return address and the bulk mail permit indicia."² He adds that they then "sorted the pieces into the requisite postal/zip code categories and transported the Mailings to the Postal Service, where they were mailed." Attached to the

(Footnote 1 continued from previous page)
to create a misleading document. Instead, it appears that the complainant inserted the last page of the brochure distributed by the Blackwell Committee with the last page of the one distributed by the State Party for comparison purposes. We further note that neither the Act nor the regulations preclude a party committee from using the same brochure as the one prepared by a candidate's authorized committee as the state party's campaign materials distributed by volunteers. Moreover, the Act provides that the exemption applies to payments by a state or local political party committee for campaign materials "used by such committee" in connection with volunteer activity. In MUR 2559, the facts indicated that the volunteers who allegedly distributed the campaign materials were volunteers of the candidate's committee rather than the state party. The Commission found payments for the campaign materials in MUR 2559 to fall outside the exemption because it appeared the volunteers were insufficiently involved in the distribution without addressing the question of whether the distribution must be by volunteers to the state party committee rather than by volunteers to the candidate's committee.

2. The "Stop Caution Go" brochure and the family record brochure appear to have had the return address printed on them, based on the examples provided in the response.

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affidavit along with copies of the brochures are sign in sheets for the volunteers who actually worked on each brochure and photographs of the volunteers performing the above tasks.

The second affidavit is from John Hurd, director of computer service for the State Party, who has responsibility for overseeing the mailing of non-allocable campaign materials. He states that the State Party mailed only the three brochures, which were reproduced in the State Party's response as attachments to the three affidavits. He adds that each piece actually mailed by the State Party under its bulk mailing permit consisted of materials purchased by the State Party and mailed at its expense. He attached copies of invoices related to the State Party's expenditures. These invoices include the following:

(1) invoices from Westerman Print Company of Cincinnati for printing the brochures;³

(2) post office forms detailing the postal charges for the mailings, and indicating that the mail trays were sorted by carrier route, thus entitling the State Party to a lower bulk mail rate;

(3) invoices from Amity Unlimited Inc. for labels for the mailing;⁴

(4) an invoice from Hathaway Stamp Co. for ideal stamps; and

(5) an invoice from Northern Printing for printing a campaign

3. One invoice also bills for 2,000 Blackwell - Barbara Bush fans at \$550 plus a portion of the sales tax.

4. Five of these invoices indicate "print label carrier route & 5 digit sort" and "Cheshire address/tray/mark zip code breaks."

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flyer.

The third affidavit is from Jeffrey Ledbetter, executive director of the State Party, who had responsibility for raising funds for the federal account and paying expenses for its activities. He said the State Party paid the expenses related to the volunteer activity on behalf of the Blackwell campaign, although he notes that the State Party has not yet completed the process of paying all of its vendors but is doing so in the ordinary course of business. Attached to his affidavit are copies of the checks written to pay for the mailings on behalf of the Blackwell campaign and the internal memorandum requesting these checks.

These checks match with the reported entries on the reports of the State Party filed with the Commission. Nevertheless, the figures on the invoices, the checks, and the reported entries on the State Party's reports are difficult to reconcile at this point. The following chart illustrates these discrepancies:

**OHIO REPUBLICAN PARTY FEDERAL CANDIDATES COMMITTEE
COMPARISON OF INVOICES, CHECKS AND REPORTED DISBURSEMENTS**

<u>INVOICES</u>	<u>CHECKS</u>	<u>REPORTED DISBURSEMENTS</u>
A. Westerman Print		
\$31,470.60(9-7)	\$8,000(10-12)	\$15,000.00(9-28)
\$11,789.63(9-30)	----	\$8,000.00(10-12)
\$14,110.60(10-15)	----	\$20,000.00(11-6)
B. Post Office		
\$2,601.13(9-13)	\$3,700(9-13)	\$3,700.00(9-13)

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\$5,860.74(9-20) ⁵	\$4,900(9-19)	\$4,900.00(9-19)
-----	\$8,500(9-25)	\$8,500.00(9-25)
-----	\$8,500(10-16)	\$8,500.00(10-25)
-----	-----	\$11,850.00(10-29) ⁶

C. Amity Unlimited

-----	\$3,542(9-19)	\$3,542.00(9-19)
\$3,542.00(10-1)	\$4,342(9-28)	\$4,342.00(9-28)
-----	\$3,542(10-11)	\$3,542.00(10-11)
\$238.81(9-28)	\$238.81(10-19)	\$238.81(10-19)
-----	-----	\$3,542.00(10-24)
\$531.93(10-25)	-----	-----
\$857.51(10-30)	-----	-----
\$210.31(10-31)	-----	-----
\$105.50(11-28)	-----	-----

D. Northern Printing

\$1,555.07(10-25)	-----	\$1,474.00(10-15)
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E. Hathaway Stamp

\$225.51(9-11)	-----	\$146.38(10-11)
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F. Cincinnati Advertising and Specialty⁷

-----	-----	\$1,363.55(10-19)
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G. Brazel Novelty

-----	-----	\$94.95(10-24)
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5. The Post Office forms indicate a balance of \$2,370.30 after the 9-13 mailing and a balance of \$4,530.94 after the 9-20 mailing. Thus, it appears that the State Party was making advance purchases of bulk rate postage and then drawing on it as it mailed the brochures. Therefore, it is possible that the entire amount paid to the Post Office exceeded the actual amount of the postage needed for the subject mailings.

6. This disbursement has been included because it was to the Post Office in Cincinnati and is described as for a non-allocable volunteer mailing, the same description given to the other payments to the Post Office relating to the Blackwell mailings.

7. The disbursements to Cincinnati Advertising and Specialty and to Brazel Novelty are included because they are described as non-allocable volunteer mailing and are payments made to Cincinnati firms, thus fitting the pattern for other disbursements relating to the Blackwell mailings.

Based on the invoices, the checks issues to the Post Office, and the reported entries, it appears that the State Party expended a potential total of \$114,971.97 on behalf of the Blackwell campaign. The copies of the checks alone, however, cover only \$45,264.81 of these costs. In addition, the State Party's reports disclose an additional \$49,928.88 in payments to Westerman Printing, Hathaway Stamp Co., Northern Printing, the Post Office, Cincinnati Advertising and Specialty, and Brazel Novelty that are apparently related to the Blackwell mailings but for which the State Party has not included in the copies of the checks or internal memoranda requesting them. In addition, the State Party's reports disclose an October 24, 1990, payment of \$3,542 to Amity Unlimited that cannot be correlated to any invoice or check. At the same time, the invoices include a total of \$1,705.25 in invoices from Amity Unlimited that are not reflected in the checks or reports. Despite these discrepancies, it appears at this point that the costs of the Blackwell mailings have been incurred by the State Party's federal account. Thus, it appears that they have been paid or will be paid from contributions subject to the limitations and prohibitions of the Act.⁸

8. Moreover, the State Party indicates in its response that portions of some bills remain to be paid. The reports filed by the State Party through the end of 1990, however, fail to disclose any outstanding debts to these vendors. Based on the invoices, it would appear the State Party still owes Westerman Printing \$14,370.83, Hathaway Stamp \$79.13, Northern Printing \$81.07, and Amity Unlimited \$1,705.25. Some of the discrepancies noted in the previous paragraph would have been resolved if the State Party had reported the debts still owed to the vendors who performed work in connection with the Blackwell mailings. The

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A review of the reports filed by the State Party do not disclose any transfer from national party committees during 1990. Therefore, it does not appear that national party funds were used to pay for the costs of the mailings. Moreover, counsel for the State Party has represented in his letter that no "earmarked" contributions were used to pay the costs of the mailings. He further states that the names of the addresses used in the mailings came from voter lists belonging to the Blackwell Committee. This statement is corroborated by the affidavit from Vada Hill. Therefore, it does not appear that a commercial list was used in the mailings. The Commission has previously recognized that the use of voter lists does not disqualify a mailing from the volunteer exemption. Although as noted above there are some discrepancies between the invoices, the checks, and the reported expenditures, it does appear that all payments made to date for the costs of the mailings have been made from the State Party's federal account. Therefore, it appears that the costs have been paid from contributions subject to the limitations and prohibitions of the Act. Thus, it appears the State Party has met these criteria for its payments to qualify for the volunteer exemption.

(Footnote 8 continued from previous page)
Act and regulations require the continuous reporting of outstanding debts. 2 U.S.C. § 434(b)(8) and 11 C.F.R. § 104.11(a). The regulations clearly state that debts over \$500 shall be reported as of the date they are incurred and that debts of \$500 or less shall be reported as of the time payment is made but not later than 60 days after they were incurred. 11 C.F.R. § 104.11(b). The State Party has apparently violated 2 U.S.C. § 434(b) by not continuously reporting these debts. We note, however, that this issue was not raised by the complaint.

The remaining issue is whether the mailings were "distributed" by volunteers or by a commercial vendor for purposes of this exemption. As noted, a majority of the Commission in MUR 2377 concluded payments for a mailing qualified for the exemption where the volunteers unpacked the materials, labeled them, sorted them by zip code, bundled them by carrier route and delivered them to the Post Office. In MUR 2377, the volunteers' role in sorting the materials by zip code and bundling them by carrier route appears to have been a key element in the decision that the exemption's criteria was met.

According to the Vada Hill affidavit, the volunteers for the Blackwell mailings also unpacked the materials, stamped them with the bulk mail permit indicia (and perhaps the return address), sorted them into zip codes, and delivered them to the Post Office. The postal forms indicate that the mailings were also bundled by carrier route, although Hill does not state in his affidavit that they did this function. Thus, the volunteer activity in this matter would appear to bear some similarity to that in MUR 2377.

We note, however, that in the present matter five of the six invoices from Amity Unlimited attached to the Hurd affidavit indicate that the labels were printed and arranged by carrier route and zip code with the zip code breaks marked. Vada Hill states that the mailings were delivered to the Blackwell

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headquarters already printed and addressed.⁹ If so, it would appear that the mailings were already sorted by zip code and carrier route when they were delivered to the volunteers. Thus, it would appear that no additional work was required on the part of the volunteers to sort the mailings by zip code and bundle by carrier route as long as the mailings were kept in the same order as they were when delivered. Therefore, we conclude that the extent of volunteer activity in these mailings is materially distinguishable from that in MUR 2377.

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Instead, it appears that the volunteer activity was limited to stamping the bulk mail permit indicia (and perhaps the return address) on the pieces of mail and delivering them to the Post Office. We conclude that such limited volunteer involvement is more comparable with the limited volunteer involvement in MUR 2288 and MUR 2559 and is insufficient to qualify these mailings for the exemption.

Accordingly, we recommend that the Commission find reason to believe that the Ohio Republican Party Federal Candidates Committee and Virginia S. Cheney, as treasurer, violated 2 U.S.C. § 441a(f) by making expenditures on behalf of the Blackwell Committee in excess of the limitations imposed by 2 U.S.C.

9. The affidavits are not entirely clear on the specificity of what the volunteers actually did. For instance, although the labels were sorted by zip code and carrier route and the materials were delivered to the volunteers already addressed, the affidavit states that the volunteers sorted the mailings by zip code. In addition, the postal forms indicate that the bulk mailings were sorted by carrier route when they were delivered to the Post Office but Hill does not say that the volunteers sorted by carrier route.

§ 441a. We further recommend that the Commission find reason to believe the Ohio Republican Party Federal Candidates Committee and Virginia S. Cheney, as treasurer, violated 2 U.S.C.

§ 434(b)(8) by not reporting debts owed to vendors in connection with the mailings on behalf of the Blackwell Committee.

D. NRCC Assistance

The complaint alleges that it is its understanding that the NRCC provided media services, consulting services, research work, and considerable national staff support for the Blackwell campaign. The complaint provides no additional information regarding this allegation.

In its response, the NRCC notes that it made \$5,000 in contributions to the Blackwell Committee with respect to the primary election and another \$5,000 in contributions with respect to the general election. It further notes that the Ohio Republican Party and the Republican National Committee authorized the NRCC to act as their agent for the purpose of making coordinated party expenditures on behalf of the Blackwell campaign. It provided copies of the respective authorization letters. The NRCC reported making \$50,106.32 in coordinated party expenditures on behalf of the Blackwell campaign. It attached copies of its reports, which disclosed these expenditures:

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<u>Purpose</u>	<u>Date</u>	<u>Amount</u>
Media Services	9-17-90	\$49,699.65
Tracking	10-15-90	351.00
Tracking	11-6-90	<u>55.67</u>
	Total	\$50,106.32

The response then asserts that the complaint is deficient in that it fails to provide any specific allegation or factual recitation of any violation or to offer any source of information or supporting documents. We note that the response makes no reference to the allegation that it provided consulting service, research work, and national staff support to the Blackwell campaign. No payments for such items are included in its reported coordinated party expenditures.

The Blackwell Committee states in its response:

Secondly, I would like to briefly address the question of staff support from the NRCC. Yes, we did have visitors to our campaign from the NRCC. These individuals came in and offered guidance in their own areas of expertise and left. They stayed for a couple of days and went on to offer this same type of staff support to other campaigns in the midwest under their assign.

It is therefore, our belief that the Blackwell for Congress Committee has not accepted anything in excess of what is allowable under the Federal Election Campaign Act.

The individual staff members of the NRCC who offered guidance and staff support to the Blackwell Committee have apparently provided staff support, presumably in the form of consulting services, to the Blackwell Committee for which they received compensation and expenses from the NRCC. Thus, it appears the Blackwell Committee did receive something of value from staff of the NRCC that has not apparently been reported by the NRCC as a contribution or coordinated party expenditure or for which the Blackwell Committee has reimbursed the NRCC.

Accordingly, we recommend finding reason to believe the NRCC violated 2 U.S.C. § 441a(f) by making excessive coordinated party

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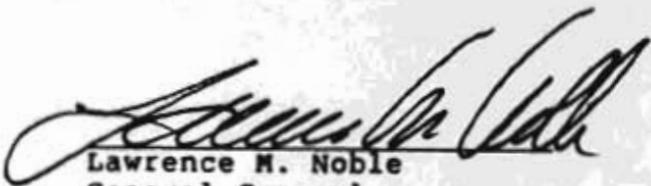
expenditures on behalf of the Blackwell campaign in the form of consulting services, research work, and national staff support.¹⁰

III. RECOMMENDATIONS

1. Find no reason to believe that the Blackwell for Congress Committee and Donald C. Auberger, as treasurer, violated any provision of the Federal Election Campaign Act of 1971, as amended, on the basis of the complaint in MUR 3218 and close the file as it pertains to these respondents.
2. Find reason to believe the Ohio Republican Party Federal Candidates Committee and Virginia S. Cheney, as treasurer, violated 2 U.S.C. §§ 434(b)(8) and 441a(f).
3. Find reason to believe the National Republican Congressional Committee and Jack McDonald, as treasurer, violated 2 U.S.C. § 441a(f).
4. Approve the attached factual and legal analyses and appropriate letters.

Date

4/12/91


Lawrence M. Noble
General Counsel

Attachments

1. NRCC Response
2. State Party Response
3. Blackwell Committee Response
4. Excerpts from State Party's reports
5. Factual and Legal Analyses (2)

¹⁰ We note that the Commission has generally treated excessive expenditures by a party committee on behalf of a candidate as excessive coordinated party expenditures rather than as in-kind contributions. See, e.g., MUR 2461, 2559, and 2994. Moreover, the Blackwell Committee would not have been in a position to know how the NRCC was treating such support. There is also no evidence that the Blackwell Committee was made aware of how the NRCC was treating this support.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS /DONNA ROACH *DR*
COMMISSION SECRETARY

DATE: APRIL 17, 1991

SUBJECT: MUR 3218 - FIRST GENERAL COUNSEL'S REPORT
DATED APRIL 12, 1991.

The above-captioned document was circulated to the Commission on MONDAY, APRIL 15, 1991 at 4:00 p.m.

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

Commissioner Aikens	<u>XXX</u>
Commissioner Elliott	<u>XXX</u>
Commissioner Josefiak	<u>XXX</u>
Commissioner McDonald	<u> </u>
Commissioner McGarry	<u> </u>
Commissioner Thomas	<u> </u>

This matter will be placed on the meeting agenda for TUESDAY, MAY 7, 1991.

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

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 3218
Blackwell for Congress Committee)
and Donald C. Auberger, as treasurer;)
Ohio Republican Party Federal Candidates)
Committee and Virginia S. Cheney, as)
treasurer;)
National Republican Congressional)
Committee-Expenditures and Jack)
McDonald, as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on May 7, 1991, do hereby certify that the Commission decided by a vote of 4-0 to take the following actions in MUR 3218:

1. Find no reason to believe that the Blackwell for Congress Committee and Donald C. Auberger, as treasurer, violated any provision of the Federal Election Campaign Act of 1971, as amended, on the basis of the complaint in MUR 3218 and close the file as it pertains to these respondents.
2. Find no reason to believe the Ohio Republican Party Federal Candidates Committee and Virginia S. Cheney, as treasurer, violated 2 U.S.C. §§ 434(b)(8) and 441a(f) and close the file as it pertains to these respondents.

(continued)

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3. Find no reason to believe the National Republican Congressional Committee and Jack McDonald, as treasurer, violated 2 U.S.C. § 441a(f).
4. Close the file in MUR 3218.
5. Send appropriate letters.

Commissioners Aikens, Elliott, Josefiak, and McGarry voted affirmatively for the decision. Commissioners McDonald and Thomas recused themselves with respect to this matter and were not present during its consideration.

Attest:

May 8, 1991
Date

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CLOSED

May 20, 1991

Gordon M. Strauss, Esquire
Thompson, Hine and Flory
Suite 1400
312 Walnut Street
Cincinnati, Ohio 45202-40029

RE: MUR 3218
Ohio Republican Party and
Virginia Cheney, as
treasurer

Dear Mr. Strauss:

On January 28, 1991, the Federal Election Commission notified your clients, the Ohio Republican Party and Virginia Cheney, as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On May 7, 1991, the Commission found, on the basis of the information in the complaint, and information provided by you, that there is no reason to believe the Ohio Republican Party and Virginia Cheney, as treasurer, violated 2 U.S.C. §§ 434(b)(8) and 441a(f). Accordingly, the Commission closed its file in this matter. The General Counsel's Report is enclosed. A Statement of Reasons explaining the Commission's determination will be issued and sent to you at a later time.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 20, 1991

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

RE: MUR 3218
National Republican
Congressional Committee and
Jack McDonald, as treasurer

Dear Mr. Baran:

On January 28, 1991, the Federal Election Commission notified your clients, the National Republican Congressional Committee and Jack McDonald, as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On May 7, 1991, the Commission found, on the basis of the information in the complaint, and information provided by you, that there is no reason to believe the National Republican Congressional Committee and Jack McDonald, as treasurer, violated 2 U.S.C. § 441a(f). Accordingly, the Commission closed its file in this matter. The General Counsel's Report is enclosed. A Statement of Reasons explaining the Commission's determination will be issued and sent to you at a later time.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 20, 1991

Mary C. Young, Campaign Director
Blackwell for Congress
925 Marion Avenue #1
Cincinnati, Ohio 45229

RE: MUR 3218
Blackwell for Congress and
Donald C. Auberger, as
treasurer

Dear Ms. Young:

On January 28, 1991, the Federal Election Commission notified Blackwell for Congress and Donald C. Auberger, as treasurer ("Committee"), of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On May 7, 1991, the Commission found, on the basis of the information in the complaint, and information provided by you, that there is no reason to believe Blackwell for Congress and Donald C. Auberger, as treasurer, violated any provision of the Federal Election Campaign Act of 1971, as amended, on the basis of the complaint filed in MUR 3218. Accordingly, the Commission closed its file in this matter. The General Counsel's Report is enclosed. A Statement of Reasons explaining the Commission's determination will be issued and sent to you at a later time.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 20, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Paul Sylvester, Treasurer
Luken for Congress Committee
3742 Glenmore Avenue
Cincinnati, Ohio 45211

RE: MUR 3218

Dear Mr. Sylvester:

On May 7, 1991, the Federal Election Commission reviewed the allegations of your complaint dated October 12, 1990, and found that on the basis of the information provided in your complaint, and information provided by the Respondents, there is no reason to believe the Blackwell for Congress Committee and Donald C. Auberger, as treasurer, violated any provision of the Federal Election Campaign Act of 1971, as amended; the Ohio Republican Party Federal Candidates Committee and Virginia S. Cheney, as treasurer, violated 2 U.S.C. §§ 434(b)(8) and 441a(f); the National Republican Congressional Committee and Jack McDonald, as treasurer, violated 2 U.S.C. § 441a(f). Accordingly, on May 7, 1991, the Commission closed the file in this matter. The General Counsel's Report is enclosed. A Statement of Reasons explaining the Commission's determination will be issued and sent to you at a later time.

The Federal Election Campaign Act of 1971, as amended ("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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

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MEMORANDUM

TO: COMMISSIONERS
GENERAL COUNSEL NOBLE
STAFF DIRECTOR SURINA
PRESS OFFICER EILAND

FROM: *MWR* MARJORIE W. ENNONS/DONNA ROACH *DR*
COMMISSION SECRETARY

DATE: MAY 24, 1991

SUBJECT: STATEMENT OF REASONS FOR MUR 3218

Attached is a copy of the Statement of Reasons in MUR 3218 signed by Commissioners Aikens, Elliott, and Josefiak. This was received in the Commission Secretary's Office on Friday, May 24, 1991 at 1:51 p.m.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

STATEMENT OF REASONS

In the Matter of)	
Blackwell for Congress Committee and)	
Donald C. Auberger, as treasurer)	NUR 3218
Ohio Republican Party Federal)	
Candidates Committee and)	
Virginia S. Cheney, as treasurer)	
National Republican Congressional)	
Committee -- Expenditures and)	
Jack McDonald, as treasurer)	

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On January 25, 1991, Paul Sylvester, treasurer of the Luken for Congress Committee, filed a complaint with the Federal Election Commission against the Blackwell for Congress Committee, the Ohio Republican Party and the National Republican Congressional Committee. The complaint alleged the Blackwell campaign received excessive party coordinated expenditures in the form of mailings financed by the state party committee and through in-kind services provided by the national party committee.

On the basis of the complaint in NUR 3218, and as recommended by the General Counsel, the Commission voted on May 7, 1991, to find no reason to believe the Blackwell for Congress Committee and Donald C. Auberger, as treasurer, violated any provision of the Federal Election Campaign Act of 1971, as amended, and to close the file as it pertains to these respondents.¹ The Commission rejected recommendations of the

1. The Commission's vote was 4 to 0 to approve the motion to reject or approve the General Counsel's recommendations, as described (Commissioners McDonald and Thomas were recused in this matter).

General Counsel as to other respondents, and voted to find no reason to believe the Ohio Republican Party Federal Candidates Committee and Virginia S. Cheney, as treasurer, violated 2 U.S.C. §§ 434(b)(8) and 441a(f) and voted to find no reason to believe the National Republican Congressional Committee ("NRCC") and Jack C. McDonald, as treasurer, violated 2 U.S.C. §441a(f), and to close the file in MUR 3218. ²

Direct Mail and the Volunteer Exception

Pursuant to the terms and requirements of 2 U.S.C. §§431(8)(B)(x) and 431(9)(B)(viii), payments by a state or local political party committee for the costs of campaign materials used in connection with volunteer activities on behalf of the party's candidates are excluded from the definition of "contribution" or "expenditure." Therefore, payments qualifying for the exception are not subject to the Act's limitations upon party committees' contributions to, or expenditures on behalf of, its candidates.

In prior cases involving direct mail and the volunteer exception, the Commission has attempted to reconcile the volunteer activity contemplated by this provision with the commonplace (and increasingly advanced) services provided by commercial printers in producing direct mail materials for "distribution" by volunteers through the mails. The Commission has focused upon whether a volunteer effort, rather than a commercial mailing house or other vendor, was responsible for completing the mailing and preparing it for delivery by the post office. See MUR 2377 and MUR 2559.

2. The General Counsel also recommended finding a violation of 2 U.S.C. §434(b)(8) by the Ohio party committee for not continuously reporting all debts related to the mailings, although that violation was not alleged in the complaint.

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In its response to the allegations of the complaint, the Ohio Republican Party presented affidavits and documentary evidence to demonstrate that its payments for mailings in support of the Blackwell campaign had met the requirements of the volunteer exception. The response indicated that a large number of volunteers had opened the cartons of printed direct mail materials and "stamped on each piece, individually, the return address and the bulk mail permit indicia" and had "sorted the pieces into the requisite postal/zip code categories and transported the Mailings to the Postal Service, where they were mailed."

We note in this matter that sequential address labeling by the printer may have made batching of the mailing by zip code and carrier route considerably simpler, but did not eliminate that step. Nor was a commercial mailing house substituted for volunteers in preparing the mailing for the post office. Since volunteers had also stamped the return address and bulk rate mailing indicia upon each piece, we concluded that the scope of volunteer involvement in the distribution of this mailing satisfied the Act's requirements that such campaign materials be used "in connection with volunteer activity."

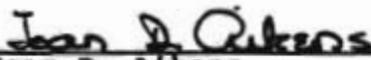
National Party Field Staff

The complaint generally alleged the NRCC provided media, research and consulting services and national staff support for the Blackwell campaign. The NRCC's response documented \$50,106.32 in coordinated expenditures for media services and tracking polls that were reported as made on behalf of the Blackwell campaign, and challenged the complaint's lack of specificity in the remaining allegations.

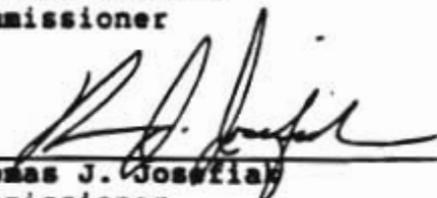
91040843445

We note that occasional visits by party committee field staff to assess the progress and viability of campaigns is a routine function of national party committees. Field operations provide the committees necessary firsthand information from which to identify opportunities for contributions and coordinated expenditures, as well as the ability to oversee the actual making of such party expenditures. These visits may include communicating information about party efforts nationally and providing advice based upon national research and experience, but such generalized consultations are not allocable contributions.

Given the evidence that tangible media and polling services had been properly attributed and reported by the NRCC as coordinated expenditures on behalf of the Blackwell campaign, and absent evidence to indicate NRCC field staff was extensively involved in managing or staffing this particular campaign on an ongoing basis (or any other specific information in the complaint), we found no reason to believe routine NRCC field activity constituted any allocable contribution to the Blackwell campaign.


Joan D. Aikens
Vice Chairman


Lee Ann Elliott
Commissioner


Thomas J. Joseph
Commissioner

May 23, 1991

91040843446



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF RIR # 3218

DATE FILMED 5/31/91 CAMERA NO. 4

CAMERAMAN AS

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THE FOLLOWING DOCUMENTATION IS ADDED TO
THE PUBLIC RECORD IN CLOSED MUR 3218.

91040843994



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 3, 1991

CLOSED

Paul Sylvester, Treasurer
Luken for Congress Committee
3742 Glenmore Avenue
Cincinnati, Ohio 45211

RE: MUR 3218

Dear Mr. Sylvester:

By letter dated May 20, 1991, the Office of the General Counsel informed you of determinations made with respect to the complaint you filed against the Ohio Republican Party, the National Republican Congressional Committee, and Blackwell for Congress. Enclosed with that letter was the General Counsel's Report.

Enclosed please find a Statement of Reasons adopted by the Commission explaining its decision to find no reason to believe that Blackwell for Congress violated any provisions of the Federal Election Campaign Act of 1971, as amended, ("the Act") on the basis of the complaint, no reason to believe the Ohio Republican Party violated 2 U.S.C. §§ 434(b)(8) and 441a(f), and no reason to believe the National Republican Congressional Committee violated 2 U.S.C. § 441a(f), from three Commissioners explaining their vote. This document will be placed on the public record as part of the file of MUR 3218. The Statement of Reasons explaining the vote of the fourth Commissioner will be sent to you at a later time.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Statement of Reasons

91040843995



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Handwritten signature

MEMORANDUM

TO: COMMISSIONERS
GENERAL COUNSEL NOBLE
STAFF DIRECTOR SURINA
PRESS OFFICER EILAND

FROM: *MWR* MARJORIE W. EMMONS/DONNA ROACH *DR*
COMMISSION SECRETARY

DATE: MAY 24, 1991

SUBJECT: STATEMENT OF REASONS FOR MUR 3218

Attached is a copy of the Statement of Reasons in MUR 3218 signed by Commissioners Aikens, Elliott, and Josefiak. This was received in the Commission Secretary's Office on Friday, May 24, 1991 at 1:51 p.m.

91040843996



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

STATEMENT OF REASONS

In the Matter of)	
)	
Blackwell for Congress Committee and)	
Donald C. Auberger, as treasurer)	NUR 3218
)	
Ohio Republican Party Federal)	
Candidates Committee and)	
Virginia S. Cheney, as treasurer)	
)	
National Republican Congressional)	
Committee -- Expenditures and)	
Jack McDonald, as treasurer)	

On January 25, 1991, Paul Sylvester, treasurer of the Luken for Congress Committee, filed a complaint with the Federal Election Commission against the Blackwell for Congress Committee, the Ohio Republican Party and the National Republican Congressional Committee. The complaint alleged the Blackwell campaign received excessive party coordinated expenditures in the form of mailings financed by the state party committee and through in-kind services provided by the national party committee.

On the basis of the complaint in NUR 3218, and as recommended by the General Counsel, the Commission voted on May 7, 1991, to find no reason to believe the Blackwell for Congress Committee and Donald C. Auberger, as treasurer, violated any provision of the Federal Election Campaign Act of 1971, as amended, and to close the file as it pertains to these respondents. ¹ The Commission rejected recommendations of the

1. The Commission's vote was 4 to 0 to approve the motion to reject or approve the General Counsel's recommendations, as described (Commissioners McDonald and Thomas were recused in this matter).

91040843997

General Counsel as to other respondents, and voted to find no reason to believe the Ohio Republican Party Federal Candidates Committee and Virginia S. Cheney, as treasurer, violated 2 U.S.C. §§ 434(b)(8) and 441a(f) and voted to find no reason to believe the National Republican Congressional Committee ("NRCC") and Jack C. McDonald, as treasurer, violated 2 U.S.C. §441a(f), and to close the file in MUR 3218. ²

Direct Mail and the Volunteer Exception

Pursuant to the terms and requirements of 2 U.S.C. §§431(8)(B)(x) and 431(9)(B)(viii), payments by a state or local political party committee for the costs of campaign materials used in connection with volunteer activities on behalf of the party's candidates are excluded from the definition of "contribution" or "expenditure." Therefore, payments qualifying for the exception are not subject to the Act's limitations upon party committees' contributions to, or expenditures on behalf of, its candidates.

In prior cases involving direct mail and the volunteer exception, the Commission has attempted to reconcile the volunteer activity contemplated by this provision with the commonplace (and increasingly advanced) services provided by commercial printers in producing direct mail materials for "distribution" by volunteers through the mails. The Commission has focused upon whether a volunteer effort, rather than a commercial mailing house or other vendor, was responsible for completing the mailing and preparing it for delivery by the post office. See MUR 2377 and MUR 2559.

2. The General Counsel also recommended finding a violation of 2 U.S.C. §434(b)(8) by the Ohio party committee for not continuously reporting all debts related to the mailings, although that violation was not alleged in the complaint.

9104084398

In its response to the allegations of the complaint, the Ohio Republican Party presented affidavits and documentary evidence to demonstrate that its payments for mailings in support of the Blackwell campaign had met the requirements of the volunteer exception. The response indicated that a large number of volunteers had opened the cartons of printed direct mail materials and "stamped on each piece, individually, the return address and the bulk mail permit indicia" and had "sorted the pieces into the requisite postal/zip code categories and transported the Mailings to the Postal Service, where they were mailed."

We note in this matter that sequential address labeling by the printer may have made batching of the mailing by zip code and carrier route considerably simpler, but did not eliminate that step. Nor was a commercial mailing house substituted for volunteers in preparing the mailing for the post office. Since volunteers had also stamped the return address and bulk rate mailing indicia upon each piece, we concluded that the scope of volunteer involvement in the distribution of this mailing satisfied the Act's requirements that such campaign materials be used "in connection with volunteer activity."

National Party Field Staff

The complaint generally alleged the NRCC provided media, research and consulting services and national staff support for the Blackwell campaign. The NRCC's response documented \$50,106.32 in coordinated expenditures for media services and tracking polls that were reported as made on behalf of the Blackwell campaign, and challenged the complaint's lack of specificity in the remaining allegations.

91040843999

We note that occasional visits by party committee field staff to assess the progress and viability of campaigns is a routine function of national party committees. Field operations provide the committees necessary firsthand information from which to identify opportunities for contributions and coordinated expenditures, as well as the ability to oversee the actual making of such party expenditures. These visits may include communicating information about party efforts nationally and providing advice based upon national research and experience, but such generalized consultations are not allocable contributions.

Given the evidence that tangible media and polling services had been properly attributed and reported by the NRCC as coordinated expenditures on behalf of the Blackwell campaign, and absent evidence to indicate NRCC field staff was extensively involved in managing or staffing this particular campaign on an ongoing basis (or any other specific information in the complaint), we found no reason to believe routine NRCC field activity constituted any allocable contribution to the Blackwell campaign.

Joan D. Aikens
Joan D. Aikens
Vice Chairman

Lee Ann Elliott
Lee Ann Elliott
Commissioner

Thomas J. Joseph
Thomas J. Joseph
Commissioner

May 23, 1991

91040844000



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 3218.
7/2/91

21J40351409



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

June 10, 1991

Mary C. Young, Campaign Director
Blackwell for Congress
925 Marion Avenue #1
Cincinnati, Ohio 45229

RE: MUR 3218
Blackwell for Congress and
Donald C. Auberger, as
treasurer

Dear Ms. Young:

By letter dated May 20, 1991, the Office of the General Counsel informed you of determinations made with respect to the complaint filed against Blackwell for Congress and Donald C. Auberger, as treasurer, by Paul Sylvester. Enclosed with that letter was the General Counsel's Report.

Enclosed please find a Statement of Reasons adopted by the Commission explaining its decision to find no reason to believe that Blackwell for Congress violated any provisions of the Federal Election Campaign Act of 1971, as amended, ("the Act") on the basis of the complaint, from three Commissioners explaining their vote. This document will be placed on the public record as part of the file of MUR 3218. The Statement of Reasons explaining the vote of the fourth Commissioner will be sent to you at a later time.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Statement of Reasons

21040351410



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 10, 1991

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

RE: MUR 3218
National Republican
Congressional Committee and
Jack McDonald, as treasurer

Dear Mr. Baran:

By letter dated May 20, 1991, the Office of the General Counsel informed you of determinations made with respect to the complaint filed against the National Republican Congressional Committee and Jack McDonald, as treasurer, by Paul Sylvester. Enclosed with that letter was the General Counsel's Report.

Enclosed please find a Statement of Reasons adopted by the Commission explaining its decision to find no reason to believe the National Republican Congressional Committee violated 2 U.S.C. § 441a(f), from three Commissioners explaining their vote. This document will be placed on the public record as part of the file of MUR 3218. The Statement of Reasons explaining the vote of the fourth Commissioner will be sent to you at a later time.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Statement of Reasons

21040351411



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CLOSED

June 10, 1991

Gordon M. Strauss, Esquire
Thompson, Hine and Flory
Suite 1400
312 Walnut Street
Cincinnati, Ohio 45202-40029

RE: MUR 3218
Ohio Republican Party and
Virginia Cheney, as
treasurer

Dear Mr. Strauss:

By letter dated May 20, 1991, the Office of the General Counsel informed you of determinations made with respect to the complaint filed against the Ohio Republican Party and Virginia Cheney, as treasurer, by Paul Sylvester. Enclosed with that letter was the General Counsel's Report.

Enclosed please find a Statement of Reasons adopted by the Commission explaining its decision to find no reason to believe the Ohio Republican Party violated 2 U.S.C. §§ 434(b)(8) and 441a(f), from three Commissioners explaining their vote. This document will be placed on the public record as part of the file of MUR 3218. The Statement of Reasons explaining the vote of the fourth Commissioner will be sent to you at a later time.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Statement of Reasons

21040351412



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 3218 .
7/8/91

21040351447



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 8, 1991

CLOSED

Mary C. Young, Campaign Director
Blackwell for Congress
925 Marion Avenue #1
Cincinnati, Ohio 45229

RE: MUR 3218
Blackwell for Congress and
Donald C. Auberger, as
treasurer

Dear Ms. Young:

By letter dated May 20, 1991, the Office of the General Counsel informed you of determinations made with respect to the complaint filed against Blackwell for Congress and Donald C. Auberger, as treasurer, by Paul Sylvester. Enclosed with that letter was the General Counsel's Report.

Enclosed please find a Statement of Reasons adopted by the Commission explaining its decision to find no reason to believe that Blackwell for Congress violated any provisions of the Federal Election Campaign Act of 1971, as amended, ("the Act") on the basis of the complaint, from the Chairman explaining his vote. This document will be placed on the public record as part of the file of MUR 3218.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Statement of Reasons

21040351448



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 8, 1991

Gordon M. Strauss, Esquire
Thompson, Hine and Flory
Suite 1400
312 Walnut Street
Cincinnati, Ohio 45202-40029

RE: MUR 3218
Ohio Republican Party and
Virginia Cheney, as
treasurer

Dear Mr. Strauss:

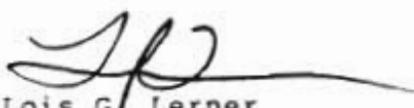
By letter dated May 20, 1991, the Office of the General Counsel informed you of determinations made with respect to the complaint filed against the Ohio Republican Party and Virginia Cheney, as treasurer, by Paul Sylvester. Enclosed with that letter was the General Counsel's Report.

Enclosed please find a Statement of Reasons adopted by the Commission explaining its decision to find no reason to believe the Ohio Republican Party violated 2 U.S.C. §§ 434(b)(8) and 441a(f), from the Chairman explaining his vote. This document will be placed on the public record as part of the file of MUR 3218.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel


BY: Lois G. Lerner
Associate General Counsel

Enclosure
Statement of Reasons

21540351449



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 8, 1991

Paul Sylvester, Treasurer
Luken for Congress Committee
3742 Glenmore Avenue
Cincinnati, Ohio 45211

RE: MUR 3218

Dear Mr. Sylvester:

By letter dated May 20, 1991, the Office of the General Counsel informed you of determinations made with respect to the complaint you filed against the Ohio Republican Party, the National Republican Congressional Committee, and Blackwell for Congress. Enclosed with that letter was the General Counsel's Report.

Enclosed please find a Statement of Reasons adopted by the Commission explaining its decision to find no reason to believe that Blackwell for Congress violated any provisions of the Federal Election Campaign Act of 1971, as amended, ("the Act") on the basis of the complaint, no reason to believe the Ohio Republican Party violated 2 U.S.C. §§ 434(b)(8) and 441a(f), and no reason to believe the National Republican Congressional Committee violated 2 U.S.C. § 441a(f), from the Chairman explaining his vote. This document will be placed on the public record as part of the file of MUR 3218.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Statement of Reasons

21040351450



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 8, 1991

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

RE: MUR 3218
National Republican
Congressional Committee and
Jack McDonald, as treasurer

Dear Mr. Baran:

By letter dated May 20, 1991, the Office of the General Counsel informed you of determinations made with respect to the complaint filed against the National Republican Congressional Committee and Jack McDonald, as treasurer, by Paul Sylvester. Enclosed with that letter was the General Counsel's Report.

Enclosed please find a Statement of Reasons adopted by the Commission explaining its decision to find no reason to believe the National Republican Congressional Committee violated 2 U.S.C. § 441a(f), from the Chairman explaining his vote. This document will be placed on the public record as part of the file of MUR 3218.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Statement of Reasons

21040351451

Noble



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: COMMISSIONERS
 GENERAL COUNSEL NOBLE
 STAFF DIRECTOR SURINA
 PRESS OFFICER EILAND

FROM: *MWR* MARJORIE W. EMMONS/DONNA ROACH *DR*
 COMMISSION SECRETARY

DATE: MAY 24, 1991

SUBJECT: STATEMENT OF REASONS FOR MUR 3218

Attached is a copy of the Statement of Reasons in MUR 3218 signed by Commissioners Aikens, Elliott, and Josefiak. This was received in the Commission Secretary's Office on Friday, May 24, 1991 at 1:51 p.m.

21040351452



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

STATEMENT OF REASONS

In the Matter of)	
)	
Blackwell for Congress Committee and)	
Donald C. Auberger, as treasurer)	MUR 3218
)	
Ohio Republican Party Federal)	
Candidates Committee and)	
Virginia S. Cheney, as treasurer)	
)	
National Republican Congressional)	
Committee -- Expenditures and)	
Jack McDonald, as treasurer)	

21040351453

On January 25, 1991, Paul Sylvester, treasurer of the Luken for Congress Committee, filed a complaint with the Federal Election Commission against the Blackwell for Congress Committee, the Ohio Republican Party and the National Republican Congressional Committee. The complaint alleged the Blackwell campaign received excessive party coordinated expenditures in the form of mailings financed by the state party committee and through in-kind services provided by the national party committee.

On the basis of the complaint in MUR 3218, and as recommended by the General Counsel, the Commission voted on May 7, 1991, to find no reason to believe the Blackwell for Congress Committee and Donald C. Auberger, as treasurer, violated any provision of the Federal Election Campaign Act of 1971, as amended, and to close the file as it pertains to these respondents. ¹ The Commission rejected recommendations of the

1. The Commission's vote was 4 to 0 to approve the motion to reject or approve the General Counsel's recommendations, as described (Commissioners McDonald and Thomas were recused in this matter).

General Counsel as to other respondents, and voted to find no reason to believe the Ohio Republican Party Federal Candidates Committee and Virginia S. Cheney, as treasurer, violated 2 U.S.C. §§ 434(b)(8) and 441a(f) and voted to find no reason to believe the National Republican Congressional Committee ("NRCC") and Jack C. McDonald, as treasurer, violated 2 U.S.C. §441a(f), and to close the file in MUR 3218. ²

Direct Mail and the Volunteer Exception

Pursuant to the terms and requirements of 2 U.S.C. §§431(8)(B)(x) and 431(9)(B)(viii), payments by a state or local political party committee for the costs of campaign materials used in connection with volunteer activities on behalf of the party's candidates are excluded from the definition of "contribution" or "expenditure." Therefore, payments qualifying for the exception are not subject to the Act's limitations upon party committees' contributions to, or expenditures on behalf of, its candidates.

In prior cases involving direct mail and the volunteer exception, the Commission has attempted to reconcile the volunteer activity contemplated by this provision with the commonplace (and increasingly advanced) services provided by commercial printers in producing direct mail materials for "distribution" by volunteers through the mails. The Commission has focused upon whether a volunteer effort, rather than a commercial mailing house or other vendor, was responsible for completing the mailing and preparing it for delivery by the post office. See MUR 2377 and MUR 2559.

2. The General Counsel also recommended finding a violation of 2 U.S.C. §434(b)(8) by the Ohio party committee for not continuously reporting all debts related to the mailings, although that violation was not alleged in the complaint.

21040351454

In its response to the allegations of the complaint, the Ohio Republican Party presented affidavits and documentary evidence to demonstrate that its payments for mailings in support of the Blackwell campaign had met the requirements of the volunteer exception. The response indicated that a large number of volunteers had opened the cartons of printed direct mail materials and "stamped on each piece, individually, the return address and the bulk mail permit indicia" and had "sorted the pieces into the requisite postal/zip code categories and transported the Mailings to the Postal Service, where they were mailed."

We note in this matter that sequential address labeling by the printer may have made batching of the mailing by zip code and carrier route considerably simpler, but did not eliminate that step. Nor was a commercial mailing house substituted for volunteers in preparing the mailing for the post office. Since volunteers had also stamped the return address and bulk rate mailing indicia upon each piece, we concluded that the scope of volunteer involvement in the distribution of this mailing satisfied the Act's requirements that such campaign materials be used "in connection with volunteer activity."

National Party Field Staff

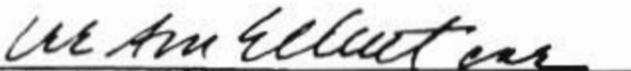
The complaint generally alleged the NRCC provided media, research and consulting services and national staff support for the Blackwell campaign. The NRCC's response documented \$50,106.32 in coordinated expenditures for media services and tracking polls that were reported as made on behalf of the Blackwell campaign, and challenged the complaint's lack of specificity in the remaining allegations.

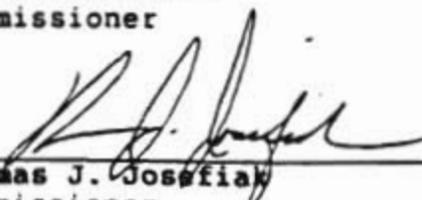
21040351455

We note that occasional visits by party committee field staff to assess the progress and viability of campaigns is a routine function of national party committees. Field operations provide the committees necessary firsthand information from which to identify opportunities for contributions and coordinated expenditures, as well as the ability to oversee the actual making of such party expenditures. These visits may include communicating information about party efforts nationally and providing advice based upon national research and experience, but such generalized consultations are not allocable contributions.

Given the evidence that tangible media and polling services had been properly attributed and reported by the NRCC as coordinated expenditures on behalf of the Blackwell campaign, and absent evidence to indicate NRCC field staff was extensively involved in managing or staffing this particular campaign on an ongoing basis (or any other specific information in the complaint), we found no reason to believe routine NRCC field activity constituted any allocable contribution to the Blackwell campaign.


Joan D. Aikens
Vice Chairman


Lee Ann Elliott
Commissioner


Thomas J. Joseph
Commissioner

May 23, 1991

21040351456



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: COMMISSIONERS
GENERAL COUNSEL NOBLE
STAFF DIRECTOR SURINA
PRESS OFFICER FRED EILAND

FROM: *John* MARJORIE W. EMMONS/DONNA ROACH *DR*
COMMISSION SECRETARY

DATE: JUNE 25, 1991

SUBJECT: STATEMENT OF REASONS: MUR 3218

Attached is a copy of the Statement of Reasons in
MUR 3218 signed by Commissioner McGarry. This was received in
the Commission Secretary's Office on June 24, 1991 4:41 p.m.

21040351457

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Blackwell for Congress Committee)
 and Donald C. Auberger,)
 as treasurer;)
)
 Ohio Republican Party Federal)
 Candidates Committee and)
 Virginia S. Cheney, as treasurer;)
)
 National Republican Congressional)
 Committee-Expenditures and)
 Jack McDonald, as treasurer)

NUR 3218

STATEMENT OF REASONS

Chairman John Warren McGarry

Activities involving party support of federal candidates, including the "volunteer exemption," present a tremendous potential for circumvention of the limitations on contributions to candidates from national and state party committees. Nonetheless, I voted to reject certain recommendations of the General Counsel given the particular circumstances surrounding the Commission's consideration of this case. My vote, however, should not be misconstrued. I strongly believe that party support activities are too often used to evade limits.

On the basis of all the facts and circumstances of this matter, and in consideration of the proper ordering of Commission priorities and resources, see Heckler v. Chaney, 470 U.S. 821 (1985), I joined my colleagues in voting to take no further action.

DATE:

6/24/91


 John Warren McGarry
 Chairman

21040351458