FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3318

DATE FILMED 9/5/91 CAMERA NO. 3

CAMERAMAN AS

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

52 Roc[illegible]dge Drive
Port Chester, N.Y.10573
April 23, 1991

91 APR 29 AM 11:36

Dear Sir/Madam:

This is a most unusual case so I ask you to bear with me for a moment.

I am a very big fan of the country singer Randy Travis; I am not a big fan, to say the least, of George Bush. Recently Mr. Travis recorded a song called "Point of Light" at Bush's request. Mr. Travis had been scheduled to have a duet released as his next single, but last night I learned from listening to my radio that "Point of Light" will be the new single instead. This means that hundreds of radio stations across America will be playing it four and five times a day for three months, the lifetime of most singles.

I believe that Bush has begun his re-election campaign early and is using this song to do it, as a subliminal and repeated message even though his name is not mentioned. I believe that this is a perversion and prostitution of our electoral system, as there is no way for the Democrats to have a response to it. I am asking that you look into this situation and see that no laws are being violated by this tricky little end-run. I have also contacted my local country station, Mr. Travis's management and record label, the Democratic National Committee, and the FCC about my concerns. As I heard the song on the radio for the first time last night I had the TV news on and saw dying Kurdish children, suffering because of George Bush. I thought the juxtaposition of the song and the reality cruel, and I swore that I had to try to do something to stop this cruel farce.

91 APR 29 PM 3:11

Sincerely,

Lina Accurso

Lina Accurso

91 0400365 1 / 59

Not every problem can be solved 'voluntarily'

AT WIT'S END

BY ERMA BOMBECK

Dear President Bush: You got a minute?

I hate to bother you and I know you're busy, and if this isn't in your domain, would you please pass it on to whoever deals with the "thousand points of light" people?

I belong to a family of volunteers. Nothing special. Nothing above and beyond what most citizens are doing, but I have to tell you it's getting tougher and tougher out there to sparkle.

Things have changed since a group of women staged a style show or baked a few brownies to raise funds to plant geraniums around the school library. We now are charged with the survival of our people. Our little fund raisers must now keep the doors open on every social service organization in existence, from battered wives to abandoned children, from bone marrow transplants to counseling, from care of the homeless and the elderly to national disasters and the arts. We are responsible for cancer and AIDS research and our cultural legacy.

Frankly, we have exhausted our creativity and our resources trying to do this. I have been roasted and raffled, judged chili contests and run in 10Ks. I have been called upon to auction an imprint of my lips, the doodles I make while I'm on the phone, quilt squares with my name on them, my husband's underwear, and so many personal items of clothing from my closet that I expect any day now to have a chairman somewhere return something with a note saying, "We're not that desperate."

I have decorated Easter eggs, drawn a picture of my family, played in tennis tournaments, and served as a celebrity waiter/cook.

Every week across our desks come appeals from good people who are using every resource they have to raise money to keep the doors open on their programs. The tab runs from $10 a ticket to $10,000 for a table of 10. Each one is important. It is impossible to pick and choose.

Mr. President, our [illegible] needs are too crucial to [illegible] balloons or sell tickets to [illegible] not a rock concert. We're [illegible] in the entertainment business. We're in the humanity business.

We are flattered to be called the "thousand points of light," but these are times when our glow is flickering. I hope the threat of darkness frightens you as much as it does us.

Voluntarily yours.

Erma Bombeck is a syndicated columnist.

Train wreck: A mess. Usage: "We've got a real train wreck coming into emergency."

POF: Pillow on face. A patient who complains too much. Usage: "She'd better quit whining or she'll be POF."

Tough stick: A person whose veins are hard to find when drawing blood.

Turf: Transfer a patient to another ward. Usage: "Let's turf that train wreck to neuro."

SOB: Short of breath.

[illegible] proved true. Two days later Dale invited reporters into her "love room." Yes, she said, she did give massages while naked but always stopped short of intercourse.

[redacted]

P.C. Update: George Mason University has put its Sigma Chi fraternity and Gamma Phi Beta sorority on probation for staging a show in which a white male dressed as a black woman appears. His costume included blackface and a pillow strapped to his buttocks. And a Family Court judge in Fairfax, Va., dismissed on free-speech grounds a case against a youth charged with burning a cross at his high school. ■

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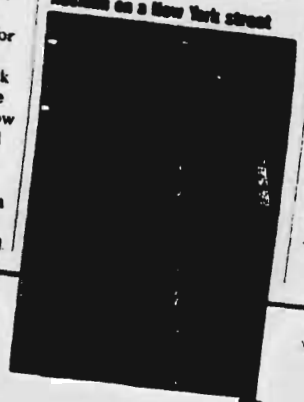
Hasidim on a New York street



[redacted]

Stop! I See a Point of Light!

George Bush must be on to something with his Points of Light program honoring voluntary public-service groups. Critics have derided it, but Democrats grumble that the president is politicizing it. Bush has ordered his staff to include a POL stop everywhere he travels. "We seek them out," says a Bush aide. "It's something he really cares about." But the Dems complain the White House is taking credit for programs that existed long before Bush took office.

LUCY HOWARD and NED ZEMAN with bureau reports

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 1, 1991

Lina Accurso
52 Rock Ridge Drive
Port Chester, New York 10573

Dear Ms. Accurso:

We have received your letter dated April 23, 1991, regarding the possibility of a violation of the Federal Election Campaign Act of 1971, as amended ("the Act").

The 1976 amendments to the Act and Federal Election Commission regulations require that a complaint meet certain specific requirements. Your letter does not meet these requirements. Consequently, the Commission can take no action at this time to investigate this matter.

However, if you desire the Commission to look into the matter discussed in your letter to determine if the Act has been violated, a formal complaint as described in 2 U.S.C. § 437g(a)(1) must be filed. Requirements of this section of the law, and Commission regulations at 11 C.F.R. § 111.4, which are a prerequisite to Commission action, are detailed below:

(1) A complaint must be in writing. (2 U.S.C. § 437g(a)(1)).

(2) Its contents must be <u>sworn to</u> and signed in the presence of a notary public and shall be <u>notarized</u>. (2 U.S.C. § 437g(a)(1)).

(3) A formal complaint must contain the full name and address of the person making the complaint. (11 C.F.R. § 111.4).

(4) A formal complaint should clearly identify as a respondent each person or entity who is alleged to have committed a violation. (11 C.F.R. § 111.4).

(5) A formal complaint should identify the source of information upon which the complaint is based. (11 C.F.R. § 111.4).

(6) A formal complaint should contain a clear and concise recitation of the facts describing the violation of a statute or law over which the Commission has jurisdiction. (11 C.F.R. § 111.4).

(7) A formal complaint should be accompanied by supporting documentation if known and available to the person making the complaint. (11 C.F.R. § 111.4).

Finally, please include your telephone number, as well as the full names and addresses of all respondents.

Enclosed is a Commission brochure entitled "Filing a Complaint." I hope this material will be helpful to you should you wish to file a legally sufficient complaint with the Commission. The file regarding this correspondence will remain confidential for a 15 day time period during which you may file an amended complaint as specified above.

If we can be of any further assistance, please do not hesitate to contact me at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure

cc: respondent(s)

11140551752

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 1, 1991

Randy Travis
c/o Lib Hatcher
1610 16 Avenue South
Nashville, TN 37212

Dear Mr. Travis:

On April 29, 1991, the Federal Election Commission received a letter alleging that you violated sections of the Federal Election Campaign Act of 1971, as amended. As indicated from the copy of the enclosed letter addressed to the complainant, those allegations do not meet certain specified requirements for the proper filing of a complaint. Thus, no action will be taken on this matter unless the allegations are refiled meeting the requirements for a properly filed complaint. If the matter is refiled, you will be notified at that time.

This matter will remain confidential for 15 days to allow for the correction of the defects. If the defects are not cured and the allegations are not refiled, no additional notification will be provided and the file will be closed.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
Copy of Improper Complaint
Copy of letter to the Complainant

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 1, 1991

J. Stanley Huckaby, Treasurer
Bush-Quayle 88
228 S. Washington Street, #200
Alexandria, Virginia 22314

Dear Mr. Huckaby:

On April 29, 1991, the Federal Election Commission received a letter alleging that Bush-Quayle 88 and you, as treasurer, violated sections of the Federal Election Campaign Act of 1971, as amended. As indicated from the copy of the enclosed letter addressed to the complainant, those allegations do not meet certain specified requirements for the proper filing of a complaint. Thus, no action will be taken on this matter unless the allegations are refiled meeting the requirements for a properly filed complaint. If the matter is refiled, you will be notified at that time.

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Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
Copy of Improper Complaint
Copy of letter to the Complainant

91040057754

LINA ACCORD
132 ROCK RIDGE DR
PORT CHESTER NY 10573

April 27, 1991
OBC 8982

Dear Sir/Madam,

I am sending a very similar letter to the ICC.

Several days ago I wrote to you about my belief that "Point of Light", the new country song by Randy Travis, is really a free campaign commercial for Barry Bush, masquerading as a favorable review. Today I saw a video based on the song released by Mr. Bush's campaign, featuring Lynn Cheney and footage of many prominent campaign events of the Bushes as well as shots of Mr. Bush.

The video will be shown with favorable commentary on Nashville Network and CMT (Country Music Television). Both outlets are owned by the Westinghouse family of companies, who are part friends of the Bushes and who co-sponsored the Texas Rangers baseball team with George Bush Jr. The video will receive daily airplay for about 3 months, constituting

91 MAY -1 AM 10:56

free election campaigns in Florida [illegible]
[illegible]

I hope that you will see that all Federal laws are applied, and that these unruly elements from election places are not allowed to stand.

Sincerely,
Lisa Fecuss

1,400,555,156

SOUTHWEST - NW16

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

52 Rock Ridge Drive
Port Chester, N.Y.10573-1216
May 4, 1991

91 MAY -9 AM 11:10

Dear Mr. Noble,

Please consider this a formal complaint as requested by your letter of May 1, in reply to my original of April 23. I have never done this before so please bear with me as I try to comply with the requirements. I have no access to insider information. I am just a citizen who is sick of the sneakiness and trickery into which our election process has deteriorated, and I am trying in my small way to put our politicians on notice that at least someone sees and resents their little manipulations.

91 MAY -9 PM 3:21

I suspect a violation of the Federal Election Campaign Act of 1971, as amended in 1976 (referred to as "the Act.")

My name is Lina Marie Accurso (full name Natalina, given at birth, never used.) My address is 52 Rock Ridge DRive, Port Chester, New York 10573-1216. My phone is (914)939-0605.

I believe the violations to be committed by George Bush and Roger Ailes, the Republican media consultant who was active in Bush's 1988 presidential campaign and who I believe continues to advise him. Bush's address is The White House, Washington, D.C. I do not know Ailes' residence, but I believe the White HOuse knows where to find him!

My basic suspicion of a campaign violation is based on the attached small clipping from Newsweek and reinforced by the events described below.

As I wrote to you in my initial letter, I feel that the current country song "Point of Light" by Randy Travis (Warner Brothers Records) is actually a free, frequent, subliminal campaign commercial for George Bush in an attempt to get an early, sneaky start on his 1992 re-election campaign. I do not name Mr. Travis or his record company in the complaint because I feel that they are being used as innocent, unsuspecting tools by Bush and Ailes. Mr. Travis is a good person who is donating his royalties from this record to the Point of Light program. If it is in your jurisdiction, I would suggest a constant yearly review of this program's finances to see how much goes for charity, and how much is used for subtle political purposes too.

To start from the very beginning:

The phrase "points of light" was first used by Bush in his August 1988 acceptance speech at the Republican National Convention, a highly political venue and occasion. It was frequently used by him in his campaign. Thus is was conceived and used politically, which most people forget.

91 040 5 1 7 5 7

No one has ev[illegible]said that Bush would not [illegible] "points of light" in his re-election campaign next year.

Bush often uses country stars for Republican campaigns and fundraisers, though to my knowledge Mr. Travis has not yet been among them.

The average "life" of a country album is about ten months to a year, and the number of singles released from it is three to six. All Mr. Travis's previous albums had three or four singles on each, and were spaced about a year apart, sometimes a little longer.

Mr. Travis's current album Heroes and Friends was released in September 1990, which is only seven months from then till this April. Only two singles were released from it. A duet with Tammy Wynette was announced as his next single on the syndicated radio show "On A Country Road." (This is on Heroes and Friends and would have made the third single.) Suddenly this idea was dropped and "Point of Light" was released as a single instead, from an album that is not even in release yet.

The song was written at the express request of Bush.

Mr. Travis performed it at a salute to the troops that was televised by CBS on April 3, and produced by Roger Ailes.

A video of this song has been taken from the special. The idea of the song is supposedly about people helping people. None of these people are shown. Instead it is all about George and Barbara Bush in the audience, surrounded by troops and American flags, either directly or shown over Mr. Travis's shoulder. There are almost as many shots of Bush as there are of Mr. Travis.

This video will be shown approximately three times a day on The Nashville Network (TNN), and up to six times a day on Country Music Television (CMT). Both are owned by the Gaylord family, who also co-own the Texas Rangers baseball team with George Bush Jr. (TNN offices are at 2806 Opryland Drive, Nashville, Tennessee.) The Gaylords also shoehorn Bush and mentions of Republican fundraisers on every program except their cooking shows, and perhaps they should be contacted as well regarding fairness laws. (In my old civics class the Bush-Gaylord connection would have been called "cartels" and "interlocking directorates" and "monopolies.")

Bush's use of Points of Light was fairly moderate in 1989 and 1990. He kicked it into high gear this spring. (See enclosed Newsweek clip.) The "co-incidence" of the song and video with this surge of activity, along with the presence of Ailes, leads me to believe that Bush and Ailes are trying to slip a political message by under the guise of charity.

Again, let me stress that "points of light" was conceived

1140 5 1 58

in and used in a political campaign, and there is no reason to think it any different now. I would appreciate your investigating the conception of the song. If you suspect that it has political origins and uses besides the stated goal, I would ask that you put a stop to its constant radio and TV airplay, or at least furnish the Democrats equal time, or insist that it be prefaced with the message that it is indeed a commercial. Since the life of a country song is three months, and since Mr. Travis is a big star, this song will be played on hundreds of stations all over America four or five times a day for three months. This is unfair.

I believe that I have complied with all your requirements. If I've missed something please let me know and I'll send it immediately. Many thanks for your time and attention.

Signed and sworn to by me,

LIna Accurso

Lina Accurso 5/6/91

Westchester Co., N.Y.

5/6/91

RONALD J. UNGER
Notary Public, State of New York
No. 01UN4919984
Qualified in Westchester County
Term Expires May 2, 1992

Gannett Westchester Newspapers/Sunday, March 10, 1991 E Section

Not every problem can be solved 'voluntarily'

AT WIT'S END

BY ERMA BOMBECK

Dear President Bush: You got a minute?

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Things have changed since a group of women staged a style show or baked a few brownies to raise funds to plant geraniums around the school library. We now are charged with the survival of our people. Our little fund-raisers must now keep the doors open on every social service organization in existence, from battered wives to abandoned children, from bone marrow transplants to counseling, from care of the homeless and the elderly to national disasters and the arts. We are responsible for cancer and AIDS research and our cultural legacy.

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Voluntarily yours.

Erma Bombeck is a syndicated columnist.

Train wreck: A mess. **Usage:** "We've got a real train wreck coming into emergency."

POF: Pillow on face. A patient who complains too much. **Usage:** "She'd better quit whining or she'll be POF."

Tough stick: A person whose veins are hard to find when drawing blood.

Turf: Transfer a patient to another ward. **Usage:** "Let's turf that train wreck to neuro."

SOB: Short of breath.

[redacted]

tire"—touched off a media frenzy. Lamont issued a statement denying he'd ever met Dale and said he'd evict her if the allegations proved true.

Two days later Dale invited reporters into her "love room." Yes, she said, she did give massages while naked but always stopped short of intercourse.

[redacted]

P.C. Update: George Mason University has put its Sigma Chi fraternity and Gamma Phi Beta sorority on probation for staging a show in which a white male dressed as a black woman appears. His costume included blackface and a pillow strapped to his buttocks. And a Family Court judge in Fairfax, Va., dismissed on free-speech grounds a case against a youth charged with burning a cross at his high school.

ron, is developing at least six movies about . . . Hasidic Jews. Among the films featuring the traditional Jewish sect: "Close to Eden," about a gentile cop who goes undercover among the Hasidim. "Benny's Heir" is about a Hasidic doctor who falls for a woman with mob ties. And producer Sherry Lansing's project is "Holy Men": a Hasid-turned-cop returns to the sect to investigate his brother's murder.

Hasidim on a New York street

[redacted]

[redacted]

Soviet spy headquarters

[redacted]

Stop! I See a Point of Light!

George Bush must be on to something with his Points of Light program honoring voluntary public-service groups. Critics have derided it, but Democrats grumble that the president is politicizing it. Bush has ordered his staff to include a POL stop everywhere he travels. "We seek them out," says a Bush aide. "It's something he really cares about." But the Dems complain the White House is taking credit for programs that started long before Bush took office.

LUCY HOWARD and NED ZEMAN with bureau reports

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 15, 1991

Lina Accurso
52 Rock Ridge Drive
Port Chester, New York 10573

Dear Ms. Accurso:

This is to acknowledge receipt on May 9, 1991, of your letter dated May 4, 1991. The Federal Election Campaign Act of 1971, as amended ("the Act") and Commission Regulations require that the contents of a complaint be sworn to and signed in the presence of a notary public and notarized. Your letter was not properly sworn to. The notary's jurat must say it was signed and sworn to before the notary.

You must swear before a notary that the contents of your complaint are true to the best of your knowledge and the notary must represent as part of the jurat that such swearing occurred. A statement by the notary that the complaint was sworn to and subscribed before him/her will be sufficient. We are sorry for the inconvenience that these requirements may cause you, but we are not statutorily empowered to proceed with the handling of a compliance action unless all the statutory requirements are fulfilled. See 2 U.S.C. § 437g.

Enclosed is a Commission brochure entitled "Filing a Complaint." I hope this material will be helpful to you should you wish to file a legally sufficient complaint with the Commission. If you have any questions concerning this matter, please contact Retha Dixon, Docket Chief, at (202) 376-3110.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure

cc: Respondent

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 15, 1991

Randy Travis
c/o Lib Hatcher
1610 16 Avenue South
Nashville, TN 37212

Dear Mr. Travis:

On May 9, 1991, the Federal Election Commission received a letter alleging that you violated sections of the Federal Election Campaign Act of 1971, as amended. As indicated from the copy of the enclosed letter addressed to the complainant, those allegations do not meet certain specified requirements for the proper filing of a complaint. Thus, no action will be taken on this matter unless the allegations are refiled meeting the requirements for a properly filed complaint. If the matter is refiled, you will be notified at that time.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
Copy of Improper Complaint
Copy of letter to the Complainant

91040055772

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 15, 1991

J. Stanley Huckaby, Treasurer
Bush-Quayle 88
228 S. Washington Street, #200
Alexandria, Virginia 22314

Dear Mr. Huckaby:

On May 9, 1991, the Federal Election Commission received a letter alleging that Bush-Quayle 88 and you, as treasurer, violated sections of the Federal Election Campaign Act of 1971, as amended. As indicated from the copy of the enclosed letter addressed to the complainant, those allegations do not meet certain specified requirements for the proper filing of a complaint. Thus, no action will be taken on this matter unless the allegations are refiled meeting the requirements for a properly filed complaint. If the matter is refiled, you will be notified at that time.

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Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
Copy of Improper Complaint
Copy of letter to the Complainant

cc: George Bush

91040055773

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 15, 1991

Country Music Television
704 18th Avenue, South
Nashville, TN 37203

Dear Gentlemen:

On May 9, 1991, the Federal Election Commission received a letter alleging that Country Music Television violated sections of the Federal Election Campaign Act of 1971, as amended. As indicated from the copy of the enclosed letter addressed to the complainant, those allegations do not meet certain specified requirements for the proper filing of a complaint. Thus, no action will be taken on this matter unless the allegations are refiled meeting the requirements for a properly filed complaint. If the matter is refiled, you will be notified at that time.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
Copy of Improper Complaint
Copy of letter to the Complainant

91040355774

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 15, 1991

Nashville Network (TNN)
2806 Opryland Drive
Nashville, TN 37214

Dear Gentlemen:

On May 9, 1991, the Federal Election Commission received a letter alleging that the Nashville Network (TNN) violated sections of the Federal Election Campaign Act of 1971, as amended. As indicated from the copy of the enclosed letter addressed to the complainant, those allegations do not meet certain specified requirements for the proper filing of a complaint. Thus, no action will be taken on this matter unless the allegations are refiled meeting the requirements for a properly filed complaint. If the matter is refiled, you will be notified at that time.

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Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
Copy of Improper Complaint
Copy of letter to the Complainant

91040315175

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 15, 1991

Roger Ailes
c/o Ailes Communications
440 Park Avenue, South
New York, New York 10016

Dear Mr. Ailes:

On May 9, 1991, the Federal Election Commission received a letter alleging that you violated sections of the Federal Election Campaign Act of 1971, as amended. As indicated from the copy of the enclosed letter addressed to the complainant, those allegations do not meet certain specified requirements for the proper filing of a complaint. Thus, no action will be taken on this matter unless the allegations are refiled meeting the requirements for a properly filed complaint. If the matter is refiled, you will be notified at that time.

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Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
Copy of Improper Complaint
Copy of letter to the Complainant

91040351176

FEDERAL ELECTION COMMISSION
RECEIVED
MAIL ROOM
92 MAY 20 PM 12:22
91 MAY 20

OGC 1198

52 Rock Ridge Drive
Port Chester, N.Y.10573-1216
(914)939-0605

May 15, 1991

Dear Mr. Noble:

Recently I filed a complaint regarding my suspicion that Georgs Bush and Roger Ailes are using the current Randy Travis song "Point of Light" as a free, subliminal campaign commercial. On Sunday I heard something on my local country radio station (WYNY-FM) that leads me to suspect that they are already concocting a cover story, so I hope you will include this letter in your investigation.

To forestall charges of politicking, one of the composers (Don Sclitz) claimed that the song was not political, according to the radio report. The radio also said that after Mr. Travis sang the song at a CBS Homecoming for the Troops special on April 3, the response was so great that Warner Brothers was forced to release it as a single.

I have no doubt that the response was great, as Mr. Travis is a great singer. However, this explantion is evasive and self-serving. Mr. Travis first sang the song publicly at Ford's Theater in Washington on March 10, where he presented a copy of the single to Bush. The single may have been released earlier than planned, but the thrust of my suspicion still stands: that its repeated playing on radio constitutes a free campaign commercial.

I would further suggest that you ask Bush and Ailes if, since they claim "Point of Light" is not political, they publicly promise not to use the song, phrase or program in the 1992 Republican Election campaign. If they stall or evade, you will know that they have been using this program and song as a campaign tool all along.

I enclose my phone number above and will answer any questions you choose to ask. Thank you again for your time and attention.

Sincerely,

Lina Accurso

Lina Accurso

91 MAY 21 AM 9:20

4 0 3 5 3 1 1 7

OGC 1317

52 Rock[redacted]ge Drive
Port Chester, N.Y.10573-
May 23, 1991

MUR 3318

Dear Mr. Noble:

Relative to my complaint of May 4, 1991, re the song "Point of Light"; respondents George Bush and Roger Ailes:

I have been advised by Ms. Retha Dixon, your docket chief, that I should have this following statement notarized.

I believe that all statements made by me in my original complaint of May 4, 1991, and the follow-up letter with new information (May 15, 1991) are true to the best of my knowledge.Sworn to and signed by me,

Lina Accurso 5/23/91

Lina Accurso

As per instructions, the following statement and space is for the notary public.

Signed and sworn to before me, Westchester N.Y. 5/23/91

RONALD J. UNGER
Notary Public, State of New York
No. 01UN4919984
Qualified in Westchester County
Term Expires May 2, 19[illegible]

91 MAY 28 PM 2:59

91 MAY 27 PM 1:48

DOC 1397

52 Roc[redacted]dge Drive
Port Chester, N.Y.10573
May 29, 1991
(914)939-0605

Dear Mr. Noble:

MUR 3318

I hope that you will put these pages of today's New York Times in my file for my complaint about the song "Point of Light." You will notice that the two men in the White HOuse who are responsible for the program and for getting the song done are not professional social workers or charity organziers, but political hacks. This further lends credence to my original charge that the song is just an early, cynical campaign commercial. They also appear to have had to "prod" Mr. Travis and the writers, and to use clout to get it the "proper play," which does not smack of true volunteerism to me, but of political strong-arm muscling and power plays.

This should not and must not be allowed in a free country. I understand that you probably cannot get this farcial song off the air, but I do hope that you forbid the use of the song and the Points of Light phrase and program in the next election. If they are as non-political as Bush and Company claim, they should have no objections at all.

Thank you for your attention. As you can see, I am very determined to pursue this to the end, and will try to follow instructions in every way I can.

Sincerely,

Lina Accurso

Lina Accurso

91 JUN -3 PM 3:18
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

91 JUN -3 PM 12:15

91040351179

The New York T

Copyright © 1991 The New York Times NEW YORK, WEDNESDAY, MAY 29, 1991

'Thousand Points' as a Cottage Industry

By JASON DePARLE
Special to The New York Times

WASHINGTON, May 28 — As the savvy image maker who picks President Bush's camera angles, Sig Rogich does not usually set domestic policy. As a country star who travels around singing of cheating, trains and Mama, neither does Randy Travis.

But the two have collaborated on perhaps the oddest feature of the Administration's domestic agenda — a country music hit detailing how the army of volunteers the President calls "a Thousand Points of Light" can meet the needs of America's downtrodden. "If you see what's wrong and you try to make it right," warbles Mr. Travis, "you will be a point of light."

The song, No. 17 on the country charts and rising, is the latest example of how a snippet of campaign oratory has grown into a cottage industry that Mr. Bush says is central to his domestic agenda.

There is a Points of Light Foundation a block from the White House, running "Points of Light" commercials on radio and television. There is a Point of Light coordinator in the White House to help the President pick his "daily point of light," a group or individual chosen every day but Sunday for outstanding volunteer service.

At the center of the Administration's efforts is is C. Gregg Petersmeyer, whose recent promotion to Bush assistant to the President makes him one of just 17 White House aides to carry the rank.

Calling volunteer work "a hallmark of what this Presidency is about," Mr. Petersmeyer discusses volunteerism in the same excited tones that astronomers use when imagining new galaxies. In a recent interview that stretched to four hours, as Mr. Petersmeyer spoke of the "oxygen" needed to spread volunteer work and its "organic connections" with society.

As "a critical strategic part of solving serious social problems," Mr. Petersmeyer said, volunteerism has two advantages over Government alone. First, it can get many more people involved, he said, turning social healing into a daily part of life. And, he

Continued on Page A18, Column 1

HAPPY BIRTHDAY SALLY LEVER LOVE Dean JF, H, AAS, B, B and Mary — ADVT.

'POINTS OF LIGHT' AS A BUSH POLICY

Continued From Page A1

said, volunteers bring something the sick and the needy value: a purity of motivation that paid workers do not.

"Now the President has been very clear, right from the start, that he thinks Government programs are critical in a wide range of areas," said Mr. Petersmeyer, but adding, "These problems will not be solved by Government alone."

Among the addition of the situation is that some critics of the Administration's Points of Light program have spent decades as advocates of volunteer work, calling its burden-sharing ethic central to a fair and democratic society. Some of these critics see the Bush effort as nothing more than political opportunism.

"The way they're using it is to cover up their absolute callous indifference about what's happening in this society," said Robert Bellah, a Berkeley sociologist who is one of the country's most prominent advocates of volunteerism. He said the Administration was using volunteerism as a cover for shirking Government responsibility.

Other critics have been less dismissive, welcoming the promotion of volunteer service but calling the Bush vision a type of "volunteerism lite." They say the President needs to do much more, like providing money for training and transportation, to make volunteerism a more potent force.

Critics See Lack of Sacrifice

More important, they argue that he has failed to call for the kind of real sacrifice that such social commitment entails. While President John F. Kennedy told citizens to ask "what you can do for your country," critics of the Bush Presidency say he has, instead, promoted a don't-worry-be-happy future of no new taxes and few obligations.

"If you're really going to change a whole society that has grown selfish and self-centered, you're going to have to fight," said Kathleen Kennedy Townsend, Kennedy's niece, who sets up programs for student volunteers in Maryland public schools. "George Bush doesn't want to fight."

Mr. Petersmeyer, accustomed to doubters, said the eloquence of the examples being set by Points of Light are winning a larger following every day.

"Points of light" entered the political lexicon in August 1988. Accepting the Republican Presidential nomination, Mr. Bush defined America as a nation of voluntary organizations — a brilliant diversity spread like the stars like a thousand points of light in a broad and peaceful sky.

The phrase stuck. Though it inspired a host of caustic political satires, including cartoons of devastated com-

"Points of light" entered the political lexicon in August 1988 as George Bush accepted the Republican nomination. Gregg Petersmeyer, a White House aide, holds a map showing points of light throughout the country representing groups or individuals chosen for outstanding volunteer service.

munities as "a thousand points of bright." Mr. Bush has used it often and effectively ever since.

"This whole country was born of volunteerism," said Peggy Noonan, a former Bush speechwriter who coined the phrase when she wrote his acceptance address. "It's us."

While Mr. Bush was talking of volunteerism, Democrats in Congress were pushing legislation to encourage it. Their main difference with the White House was that the Democrats wanted to give volunteers money to help them with things like training, transportation and future scholarships for the volunteers.

The sides made a deal. Last November Mr. Bush signed a law that pledges about $250 million in service programs over the next three years to be distributed by a commission appointed by Mr. Bush. And he vetoed a bill signed to provide an additional $22.5 million for the Points of Light Foundation, a private, nonpartisan group that lists Mr. Bush as its honorary chairman.

Rogich Turned to Nashville

[illegible]

Oratory turned to music climbs to No. 17 on the country chart.

[illegible]

earlier, while serving as a summer intern in the White House under President Richard M. Nixon.

It was Mr. Petersmeyer who came up with the idea of picking a "daily point of light" to honor and advertise good works. The President approved the idea, and a map in Mr. Petersmeyer's office is now crowded with [illegible] pushed numbered thumbtacks marking the sites of light — Phoenix, No. [illegible] Andrew McDonough for organizing hotels to donate vacant rooms to the homeless, Charlotte, N.C., [illegible] the Duke Power Company for employees who work as mentors in [illegible] Carolina schools.

Mr. Petersmeyer [illegible] asked [illegible] the selections are [illegible] saying the names come from a committee in his office kept anonymous to protect it from lobbyists. Mr. Bush personally reviews nominees, [illegible] Mr. Petersmeyer said, adding that politics were not a consideration.

Still, one thing the winners seem to share is a lack of [illegible] politics.

'The Who Didn't Make It'

Nancy [illegible] Maley, who helped start the [illegible] said [illegible] honor [illegible] sounded when Mr. Maley said her philosophy was [illegible]

When [illegible] talk about [illegible] ing, [illegible] components of [illegible] ness, [illegible] said.

Mr. Petersmeyer said he was so impressed with [illegible] Mr. Maley's qualities should not have disqualified her in many respects.

Even those who oppose the Administration's domestic agenda see [illegible] Bush Administration [illegible] the Bush Administration [illegible] the needs [illegible] Democrats [illegible]

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

June 4, 1991

Lina Accurso
52 Rock Ridge Drive
Port Chester, New York 10573

RE: MUR 3318

Dear Ms. Accurso:

This letter acknowledges receipt on May 28, 1991, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by George Bush, Roger Ailes, Randy Travis, Nashville Network(TNN), and Country Music Television. 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 3318. 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

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

June 4, 1991

Randy Travis
c/o Lib Hatcher
1610 16 Avenue South
Nashville, TN 37212

RE: MUR 3318

Dear Mr. Travis:

The Federal Election Commission received a complaint which alleges that you 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 3318. 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.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

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

91040553754

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

June 4, 1991

J. Stanley Huckaby, Treasurer
Bush-Quayle '88
228 S. Washington Street #200
Alexandria, VA 22314

RE: MUR 3318

Dear Mr. Huckaby:

The Federal Election Commission received a complaint which alleges that Bush-Quayle '88 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 3318. 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 Bush-Quayle '88 and you as treasurer, 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.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

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

cc: George Bush

21040551736

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

June 4, 1991

Country Music Television
704 18th Avenue, South
Nashville, TN 37203

RE: MUR 3318

Dear Gentlemen:

The Federal Election Commission received a complaint which alleges that Country Music Television 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 3318. Please refer to this number in all future correspondence.

Under the Act, Country Music Television has the opportunity to demonstrate in writing that no action should be taken against Country Music Television 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.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

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

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

June 4, 1991

Nashville Network (TNN)
2806 Opryland Drive
Nashville, TN 37214

RE: MUR 3318

Dear Gentlemen:

The Federal Election Commission received a complaint which alleges that the Nashville Network (TNN) 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 3318. Please refer to this number in all future correspondence.

Under the Act, the Nashville Network has the opportunity to demonstrate in writing that no action should be taken against the Nashville Network 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.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

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

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 4, 1991

Roger Ailes
c/o Ailes Communications
440 Park Avenue, South
New York, New York 10016

RE: MUR 3318

Dear Mr. Ailes:

The Federal Election Commission received a complaint which alleges that you 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 3318. 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.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

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

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 4, 1991

Warner Brothers Records
c/o Lib Hatcher
1610 16 Avenue South
Nashville, TN 37212

RE: MUR 3318

Dear Gentlemen:

The Federal Election Commission received a complaint which alleges that Warner Brothers Records ("WBR") 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 3318. Please refer to this number in all future correspondence.

Under the Act, WBR has the opportunity to demonstrate in writing that no action should be taken against WBR 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.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

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

11040553774

06C 1481

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 JUN 10 AM 11:34

52 Rock[redacted]ge Drive
Port Chester, N.Y.10573
June 6, 1991
(914)939-0605

MUR 3318

Dear Mr. Noble:

Thank you for your letter of June 4 and your kindness in pursuing the "point of Light" matter. However, I do wish to make one correction in your letter.

I did not ask to make Randy Travis one of the respondents, as I believe that he was imposed upon by the others. I sent a copy of the New York Times of May 29, 1991, that further backs up my suspicions about the others, but makes clear that Mr. Travis is not a politically savvy person. If you want to add any people, then please add Sig Rogich and C. Gregg Petersmeyer, who work at the White House and who are the ones who "prod"ied Mr. Travis's record company (the exact word used by Rogich on page 18 of the continuation of the article.)

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

91 JUN 10 PM 3:12

I repeat that if the song is as "non-political" as the Bush forces say, then the Point of Light program, the phrase and the song should not and must not be used at all by Bush in the 1992 campaign and convention. However, I believe that based on my suspicions and the New York Times article, the intent was free political campaign advertising all along.

I swear that to the best of my knowledge, all statements made by me in this letter and in my previous correspondence with you are true.

Lina Accurso

Lina Accurso

The following space is for the notary public:
Sworn to and signed before me: 6/6/91

RONALD J. UNGER
Notary Public, State of New York
No. 01UN4919984
Qualified in Westchester County
Term Expires May 2, 19[illegible]

OGC 1612

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 JUN 19 AM 10: 03

Randy Travis

June 18, 1991

91 JUN 19 PM 3: 13

Mr. Todd S. Hageman
Staff Member
Federal Election Commission
Washington, D.C. 20463

RE: MUR 3318

Dear Mr. Hageman:

I am in receipt of Ms. Lois Lerner's letter concerning a complaint made by Lina Accurso that I have violated the Federal Election Campaign Act of 1971.

This is very disconcerting. The single "Point of Light" is not meant to be, nor should it be construed to be a political statement. The song is a personal expression of support for all of America's many volunteers. It is hoped that the song will help to motivate every American to engage in some form of consequential community service to help others less fortunate.

Sincerely,

Randy Travis

Randy Travis

P.O. BOX 121137, NASHVILLE, TENNESSEE 37212 (615) 383-7258
FAX: (615) 269-7828

00-C1631

RECEIVED
FEDERAL ELECTION COMMISSION

91 JUN 21 AM 9:44

Hal Willis
Senior Counsel

HAND DELIVERED

VIA FEDERAL EXPRESS

OPRYLAND USA

June 20, 1991

91 JUN 21 AM 10:55

Lois G. Lerner, Esq.
General Counsel's Office
Federal Election Commission
999 E Street NW
Washington, DC 20463

RE: MUR 3318
"Point of Light"
The Nashville Network
Country Music Television

Dear Ms. Lerner:

Your June 4 letters to The Nashville Network and Country Music Television have been referred to this office for reply.

The position of TNN and CMT in this matter is quite simple. Both are basic cable networks which have merely exhibited the "Point of Light" video clip, as they have exhibited hundreds of other such clips received from record companies and other third party producers. The investigation I have been able to make in the limited time allowed has not revealed that either network, or any other division of the Opryland or Gaylord enterprises, had any involvement in the writing of the musical composition or the production of the video clip, or that either network is giving this video clip preferential airing, as compared to other video clips of hit songs by major artists which are currently receiving airplay on hundreds of radio stations. The allegation by Ms. Accurso that the Gaylords "shoehorn Bush and mentions of Republican fundraisers" into our programming is so vague we cannot possibly respond to it, especially on such short notice.

It may be of benefit for you to know that, according to our information, the producers of the "Point of Light" video clip are Ailes Communications, Inc. and Smith Hemion Productions, the publishers which own the copyright in the song are Don Schlitz Music, Almo Music, EMI Blackwood Music and Bethlehem Music, and the record and video clip are distributed by Warner Bros. Records.

Please feel free to call on me if you require any further information.

Respectfully,

Hal Willis

Hal Willis

06C1687

Mark Goldstein
Senior Director of Business Affairs

91 JUN 26 AM 11:01

June 21, 1991

Federal Election Commission
General Counsel's Office
999 E Street N.W.
Washington, D. C. 20463
Attn: Todd S. Hageman

Re: Your Matter MUR3318

General Counsel:

Your letter of June 4, 1991 to Warner Bros. Records (at the incorrect address "c/o Lib Hatcher, 1610 16th Avenue South, Nashville, Tennessee 37212") was received by Warner Bros. Records ("WBR") on June 11, 1991.

In your letter to Warner Bros. Records you indicate that the Federal Election Commission ("FEC") received a complaint "which alleges" that WBR may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). The purpose of this letter is to provide you with information to show that no action should be taken against WBR in connection with the complaint.

First, as a matter of clarification, you will note that in the sixth paragraph of the original complaint, the complainant specifically states "I do not name Mr. Travis or his record company in the complaint...". Nonetheless, the remainder of this letter shall be premised upon the assumption that the complaint does allege a violation by WBR.

The complaint concerns the Randy Travis recording of the composition "Point of Light", and the possibility that the recording is being used as a "free, subliminal campaign commercial". In fact, at least as far as WBR is concerned, the "Point of Light" recording (the "Recording") is nothing more than the latest fine performance of a fine song by Randy Travis.

1. The song "Point of Light" was written by Don Schlitz and Thom Schuyler, two well-known, well-established Nashville songwriters. In fact, Schlitz was a co-writer of the song that has commonly been credited with helping turn Randy Travis into a superstar, "Forever and Ever, Amen". In addition, these two songwriters have, individually and with others, written a number of extremely successful songs. As a major "country music" superstar, and a singer who has recorded songs

by these composers before, it is not at all out of the ordinary that the song would have been recorded by Randy Travis. Good songs are very important to success in the "country music" field, and if good songs are made available to recording artists, the singers will sing them. While it is obviously a subjective matter to determine whether or not a given song is a "good" song, this particular song is a song written by proven, established, successful songwriters and one that has, based on the success of the Recording since its release as a single, been shown to have at the least been a very popular song.

2. After Randy Travis sang the composition on a television special honoring the troops returning from the Persian Gulf, the response not only from the public but also from radio stations was so strong that the decision was made by both Randy Travis and WBR to release the Recording as a single record. As you may be aware, there are many, many more songs released in a given week or month than there are "openings" on radio playlists for these newly-released songs to receive substantial airplay. When there is a built-in demand for a particular song to be played on the radio, a record company would indeed be foolish not to satisfy that demand. That is, after all, the marketplace in action.

3. The initial complaint letter dated May 4, 1991 indicates that a Tammy Wynette duet was scheduled to be released as the third single from Mr. Travis's "Heroes & Friends" album and states that "this idea was dropped" and the Recording was released as a single instead. In fact, while the Recording was released as a single, the Tammy Wynette duet <u>is</u> scheduled to be released as a single. The single release is, however, planned to be by Sony Music (see attached letter Exhibit A). Sony Music is the company for which Tammy Wynette records. At the request of Sony Music and Tammy Wynette, Randy Travis and WBR agreed with Sony and Tammy Wynette that Sony would release this track as a single in order to help give a boost to Ms. Wynette's upcoming album. This is a common practice in the "country music" industry; WBR had to obtain the consent of Sony Music to include the performance of Tammy Wynette in duet with Randy Travis on Mr. Travis's album, and would have had to obtain the consent of Sony Music to release as a single the duet recording embodying Ms. Wynette's performance. As a sort of "quid pro quo", and in the expectation that both record

companies will be similarly cooperative in the future (as they have been similarly cooperative in the past), this "trading" of single record release rights was arranged. In connection with WBR's consent to the release by Sony Music of the Recording as a single, Sony Music has agreed to coodinate with WBR the release schedule of the single so that it helps Mr. Travis's record as well. Accordingly, the complainant's assertion that the number of singles derived from the "Heroes & Friends" album is unusually small is not supported by the facts.

4. The complaint further states that "the song was written at the express wishes of Bush". WBR does not know if this is true, but, as noted above, the decision to release the Recording as a single was based on the merits of the song and not on the basis of any commission from any person or any potential political benefit from release of the Recording.

5. The complaint also alleges that the video of the Recording "is all about George and Barbara Bush in the audience" and contains "almost as many shots of Bush as there are of Mr. Travis". In fact, while Mr. Bush does appear in the video, he only appears two times for a total on screen period in the aggregate of approximately 20 seconds. Mr. Travis is on screen at least ten separate times for not fewer than 2 minutes in the aggregate, as well as an additional amount of time (approximately 10 seconds) when he shares the screen with the crowd (not including Mr. Bush). Since the video footage was derived from live footage from the television special noted above, which Mr. Bush attended, it is entirely natural that the shots of Mr. Bush would also be included in the video. Given the relative period of time that Mr. Bush and Mr. Travis are on screen, however, it cannot fairly be said that the video is a vehicle for Mr. Bush rather than for Mr. Travis and the song he is singing.

In fact, WBR did consider the possibility of preparing an entirely new video with respect to the Recording. The decision not to prepare such a new video was made, however, because (1) there was not enough time to prepare a video "from scratch" and have it ready in time to help support the single and (2) it was substantially more expensive to "shoot" an entirely new video than to use footage that was already available. The decision not to do a new video was not made for any political reasons.

6. It is true, as the complaint states, that the video will be shown on The Nashville Network and on Country Music Television. Many other videos made by WBR, as well as videos from other record companies, are shown on these two networks. In fact, these other videos are shown as often (if not more often) on those channels than the video of the Recording, and these other videos are not allegedly political in nature. The ownership of these cable networks is irrelevant to WBR or to any other record company; what is important is that the record-buying market that WBR is trying to reach is served very well by these networks.

7. The complaint several times mentions that Roger Ailes may have been involved in the political maneuverings alleged to be behind the release of the recording and video. In fact, WBR was almost unable to release the video at all due in part to the difficulty of completing negotiations with Mr. Ailes's office to acquire the rights necessary to embody footage from the television special in the video.

In summary, the decision by WBR to release the Recording as a single and to release a video of the Recording was made purely for artistic and marketplace-driven reasons. There was no political "collusion" between WBR and any member of the White House or Roger Ailes.

Please feel free to contact me if I can be of further assistance or can answer any further questions.

WBR thanks you for the opportunity to respond.

Sincerely,

Mark Goldstein

MG:nmm

Ailes Communications, Inc.

VIA FAX

July 10, 1991

91 JUL 11 AM 9:55

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

Attention: Todd S. Hageman

RE: MUR 3318

Dear Mr. Noble:

I am in receipt of your letter of June 4, 1991, to Roger Ailes, in care of Ailes Communications, Inc. Mr. Ailes has been travelling extensively, and your letter has just come to my attention. I apologize for the delay in responding to you on this matter.

Mr. Ailes, who is out of the office currently, has now been informed of your letter, and has asked me to request an extension on his behalf. Accordingly, I hereby request an extension of twenty days from this date, in order to provide Mr. Ailes time to review the complaint and respond. Thank you for your assistance in this matter.

Very truly yours,

Stephen G. D'Agostino

cc: R. Ailes
J. Laterza

440 Park Avenue South New York, NY 10016 (212) 686-8400 FAX (212) 689-3701

Ailes Communications, Inc.

July 26, 1991

HAND DELIVERED

91 JUL 30 AM 9:40

FEDERAL ELECTION COMMISSION

Lawrence M. Noble
General Counsel
999 E Street, N.W.
Washington, DC 20463

Attention: Todd S. Hageman

RE: MUR 3318

Dear Mr. Noble:

This responds to your letter of June 4, 1991, notifying me of a complaint alleging that I may have violated the federal election laws.

I have reviewed the letters to you from Lina Accurso, and cannot identify what violations of the election laws are alleged to have occurred. However, I would like to provide the following facts to assist you in your review of this Matter:

1.) I have had no contact with The Nashville Network or Country Music Television or the Gaylord family concerning any musical recording or video by Mr. Randy Travis.

2.) I have had no contact concerning any such recording or video with any re-election campaign for President George Bush, nor to my knowledge does any such campaign currently exist. To my knowledge President Bush is not currently a candidate for any office.

3.) My only contact with Mr. Travis concerning his "Point of Light" song was to broadcast it 'live' during the CBS Television Special Salute to the Troops in April. I served as executive producer of this CBS Special pursuant to a contract with CBS, and not on behalf of any other individual or entity.

4.) Following the conclusion of the TV Special, my firm was approached by Warner Brothers Records to use some of the Randy Travis footage for a music video to promote his song. We told them that we had no objection to their using the footage for that purpose. I have no knowledge of what use, if any, Warner Brothers made of this material.

I trust the Commission will dismiss this baseless and frivolous Matter.

Very truly yours,

Roger E. Ailes

Roger E. Ailes
Chairman

140 Park Avenue South New York, NY 10016 (212) 685-8400 FAX (212) 689-3701

RECEIVED
F.E.C.
SECRETARIAT
91 AUG -7 AM 11:11

FEDERAL ELECTION COMMISSION
999 E St., N.W.
WASHINGTON, D.C. 20463

FIRST GENERAL COUNSEL'S REPORT **SENSITIVE**

MUR #3318

DATE COMPLAINT RECEIVED
BY OGC: May 9, 1991

DATE OF NOTIFICATION TO
RESPONDENTS: May 15, 1991

STAFF MEMBER Todd S. Hageman

COMPLAINANT:	Lina Accurso
RESPONDENTS:	Roger Ailes Randy Travis Country Music Television The Nashville Network (TNN) Warner Brothers Records, Inc. Bush-Quayle '88 and J. Stanley Huckaby, as treasurer
RELEVANT STATUTES:	2 U.S.C. § 441b 2 U.S.C. § 441d
INTERNAL REPORTS CHECKED:	None
FEDERAL AGENCIES CHECKED:	None

I. GENERATION OF MATTER

On May 28, 1991, Lina Accurso filed a complaint with the Commission. See Attachment 1. The complaint alleges that respondents Roger Ailes, Country Music Television ("CMT"), The Nashville Network (TNN) ("TNN"), Warner Brothers Records, Inc. ("WBR"), and Bush-Quayle '88 and J. Stanley Huckaby, as treasurer ("Committee"), cooperated with a certain Bush administration official in a scheme to use respondent Randy Travis, a well known country music recording artist, as an "unsuspecting tool" in President George Bush's re-election

campaign.

Specifically, the complaint, and its informational supplement, asserts that a White House official, subsequently identified as Mr. Sig Rogich, coerced Mr. Travis into performing a song which amounts to a "free, frequent, subliminal campaign commercial" for Mr. Bush. The song at issue, which was recorded on Warner Brothers Records, is entitled "Points of Light." The song was performed by Mr. Travis on a special program aired on a major television network. The television special was produced by Mr. Ailes and attended by Mr. Bush for the purpose of saluting the troops returning from the Persian Gulf. During this television program, a music video was shot which prominently includes Mr. Bush. The complaint notes that the phrase "points of light" was coined by Mr. Bush to promote his candidacy for the presidency in 1988. Furthermore, Mr. Bush currently serves as the honorary Chairman of the Points of Light Foundation which honors voluntary public-service groups. Mr. Travis is donating all royalties from this song to the Points of Light Foundation.

The complaint alleges that the song "Points of Light" was written at the request of Mr. Bush, and the subsequent radio airplay and running of the music video on TNN and CMT result in expenditures on behalf of Mr. Bush's "1992 re-election campaign" which violate the Federal Election Campaign Act, as amended, ("the Act") by having a political advertisement subsidized by corporate treasury funds.

II. FACTUAL AND LEGAL ANALYSIS

The response from WBR, an incorporated entity in the business of selling recordings for profit, explained that Mr. Travis's "Points of Light" recording was initiated, recorded, released and sold in the normal course of business. See Attachment 2. The song at issue was written by two well-known and successful country music songwriters, at least one of whom had prior experience writing songs for Mr. Travis. Furthermore, the response states, following Mr. Travis's performance of the song on the television program, there was an overwhelming public demand for the song. It was this public demand that convinced WBR to release the single for radio airplay and the music video to be played on television stations such as TNN and CMT which are in the business of playing popular country music videos for profit.

In a joint response filed by TNN and CMT, both of which are subsidiaries of Opryland USA, Inc., they too state that public demand, rather than political considerations, dictate their broadcasting decisions, including the decision to broadcast the "Points of Light" music video. See Attachment 3. The WBR response also points out that, despite the complaint's assertions that Mr. Ailes was involved in a scheme to publicize the song as a political commercial for Mr. Bush, "WBR was almost unable to release the video at all due in part to the difficulty of completing negotiations with Mr. Ailes's office to acquire the rights necessary to embody footage from the television special in the video." See Attachment 2, at page 10.

Mr. Ailes's response states that his only involvement with the song and video was due to contractual obligations to the television network to produce the special. See Attacment 5. Mr. Ailes also states that he had no contact with TNN, CMT or the Committee; and only minimal contact with Mr. Travis, which was necessary in his capacity as producer of the television special. Also, in a response filed by Mr. Travis, he states that the song at issue "is not meant to be, nor should it be construed to be a political statement." Mr. Travis characterizes the recording as a "personal expression" supporting America's many volunteers. See Attachment 4.

Pursuant to 2 U.S.C. § 441b(a), it is unlawful for any corporation to make an expenditure in connection with any election to any federal political office. The Act defines an expenditure as any purchase, payment, distribution, loan, advance, deposit, or gift of money or anything of value, made by any person for the purpose of influencing any election for Federal office. 2 U.S.C. § 431(9)(A)(i). Furthermore, the Act requires a disclaimer statement for general public communications which solicit contributions or expressly advocate the election or defeat of a clearly identified candidate. 2 U.S.C. § 441d and 11 C.F.R. § 110.11(a)(1).

In the matter at issue, a member of the Bush administration admittedly convinced two well-known country music song writers to compose a song reflecting Mr. Bush's campaign theme of voluntarism and incorporating a campaign phrase, "points of light," into the song. See Attachment 1 at page 6.

The Bush administration official also admittedly helped the composers smooth out the lyrics and prodded them to assure the song would be released and receive proper play. The Bush administration official also recruited a well-known country music recording artist, Randy Travis, to perform the song. Due to the public demand for the song following its performance by Mr. Travis on the television special, WBR released the song for play on radio stations. Also, according to WBR, as a result of the song's overnight success, the company moved quickly to exploit the song's popularity by releasing a music video. The video was pieced together utilizing footage of Mr. Travis's performance of the song at the television special and included numerous appearances by the president. The video was then released by WBR and broadcast on appropriate television stations.

The song "Points of Light," which was initiated and pursued by a Bush administration official, has undoubtedly furthered a central campaign theme of the 1988 Bush presidential campaign, and the radio airplay and television video disseminate this inherently political message to vast amounts of people through at least two different media. However, the song and the video in no way expressly advocate the election or defeat of a clearly identified candidate, namely Mr. Bush. Furthermore, the song does not identify Mr. Bush, or any other candidate, or any federal election or political office. Also, it appears the "points of light" theme has become a part of the Bush administration's domestic policy agenda.

The Commission has dealt with the issue of campaign related activity with regard to officeholders in several Advisory Opinions. The Commission has concluded that public appearances by officeholders may result in campaign activity if the event involves the solicitation of political contributions or the express advocacy of a candidate's election or defeat. See AO 1988-27 (citing opinions). The absence of these criteria do not necessarily preclude a public appearance from being campaign related, however. Id. In this matter, the song and corresponding music video neither expressly advocate the election of, nor solicit contributions on behalf of Mr. Bush. Furthermore, as noted, the "points of light" theme appears to have become current Bush administration policy rather than exclusively a campaign slogan. Finally, notwithstanding the complaint's assertions, there is no evidence to suggest that the actions of the corporate and commercial entities involved in this matter were prompted by motivations other than normal commercial profit seeking. The combination of these factors would indicate that the song and corresponding music video do not trigger any provisions of the Act or of the Commission's regulations with regard to campaign related activity by an officeholder.

Despite the song's obvious reference to a Bush campaign theme and the central role of at least one Bush administration official, Mr. Rogich, in developing and pursuing the song's release, the initiation, recording, dissemination and performance of the song "Points of Light" does not appear to

violate 2 U.S.C. §§ 441b or 441d with regard to prohibited contributions by corporations to the Bush campaign or improper public political advertising by WBR, TNN, CMT, Randy Travis, Roger Ailes or the Committee. Therefore, this Office recommends that the Commission find no reason to believe that Roger Ailes, Randy Travis, Country Music Television, The Nashville Network, Warner Brothers Records, Inc. or Bush-Quayle '88 and J. Stanley Huckaby, as treasurer violated 2 U.S.C. §§ 441b, 441d or any other section of the Act or of the Commission's regulations.

III. RECOMMENDATIONS

1. Find no reason to believe that Roger Ailes, Randy Travis, Country Music Television, The Nashville Network (TNN), Warner Brothers Records, Inc. or Bush-Quayle '88 and J. Stanley Huckaby, as treasurer, violated 2 U.S.C. §§ 441b, 441d or any other section of the Federal Election Campaign Act, as amended, or of the Commission's regulations.

2. Approve the appropriate letters.

3. Close the file.

Lawrence M. Noble
General Counsel

8/6/91
Date

BY: [signature]
Lois G. Lerner
Associate General Counsel

Attachments
1. Complaint and informational supplement
2. WBR Response
3. TNN and CMT Response
4. Randy Travis Response
5. Roger Ailes Response

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Roger Ailes; Randy Travis; Country Music Television; The Nashville Network (TNN); Warner Brothers Records, Inc.; Bush-Quayle '88; and J. Stanley Huckaby, as treasurer.	)	MUR 3318

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 9, 1991, the Commission decided by a vote of 6-0 to take the following actions in MUR 3318:

1. Find no reason to believe that Roger Ailes, Randy Travis, Country Music Television, The Nashville Network (TNN), Warner Brothers Records, Inc. or Bush-Quayle '88 and J. Stanley Huckaby, as treasurer, violated 2 U.S.C. §§ 441b, 441d or any other section of the Federal Election Campaign Act, as amended, or of the Commission's regulations.

2. Approve the appropriate letters, as recommended in the General Counsel's Report dated August 6, 1991.

3. Close the file.

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

Attest:

8-9-91
Date

for Delores Harris
Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Wed., August 7, 1991, 11:11 a.m.
Circulated to the Commission: Wed., August 7, 1991, 4:00 p.m.
Deadline for vote: Fri., August 9, 1991, 4:00 p.m.

bjf

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 19,, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lina Accurso
52 Rock Ridge Drive
Port Chester, NY 10573

RE: MUR 3318

Dear Ms. Accurso:

On August 9, 1991, the Federal Election Commission reviewed the allegations of your complaint and submissions dated May 4, 15, May 23, and May 29, 1991, and found that on the basis of the information you provided and information provided by the respondents, there is no reason to believe Roger Ailes, Randy Travis, Country Music Television, The Nashville Network (TNN), Warner Brothers, Inc., Bush-Quayle '88 and J. Stanley Huckaby, as treasurer violated 2 U.S.C. §§ 441b, 441d or any other section of the Federal Election Campaign Act, as amended, or of the Commission's regulations. Accordingly, on August 9, 1991, the Commission closed the file in this matter.

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

91040313 12

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CLOSED

August 19, 1991

Randy Travis
c/o Lib Hatcher
1610 16th Avenue South
Nashville, TN 37212

RE: MUR 3318

Dear Mr. Travis:

On June 4, 1991, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On August 9, 1991, the Commission found, on the basis of the information in the complaint, and information provided by you, there is no reason to believe you violated 2 U.S.C. §§ 441b, 441d or any other section of the Federal Election Campaign Act, as amended, or of the Commission's regulations. Accordingly, the Commission closed its file in this matter.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
GC Report

91040313

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

August 19, 1991

J. Stanley Huckaby, Treasurer
Bush-Quayle '88
228 S. Washington Street
Suite 200
Alexandria, VA 22314

RE: MUR 3318

Dear Mr. Huckaby:

On June 4, 1991, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On August 9, 1991, the Commission found, on the basis of the information in the complaint, and information provided by you, there is no reason to believe Bush-Quayle '88 and you, as treasurer, violated 2 U.S.C. §§ 441b, 441d or any other section of the Federal Election Campaign Act, as amended, or of the Commission's regulations. Accordingly, the Commission closed its file in this matter.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
GC Report

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 19, 1991

Mr. Hal Willis
Opryland USA, Inc.
2806 Opryland Drive
Nashville, TN 37214

RE: MUR 3318
Country Music Television
The Nashville Network

Dear Mr. Willis:

On June 4, 1991, the Federal Election Commission notified your clients of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On August 9, 1991, the Commission found, on the basis of the information in the complaint, and information provided by you, there is no reason to believe Country Music Television and The Nashville Network violated 2 U.S.C. §§ 441b, 441d or any other section of the Federal Election Campaign Act, as amended, or of the Commission's regulations. Accordingly, the Commission closed its file in this matter.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
GC Report

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 19, 1991

Roger Ailes
Ailes Communications, Inc.
440 Park Avenue South
New York, NY 10016

RE: MUR 3318

Dear Mr. Ailes:

On June 4, 1991, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On August 9, 1991, the Commission found, on the basis of the information in the complaint, and information provided by you, there is no reason to believe you violated 2 U.S.C. §§ 441b, 441d or any other section of the Federal Election Campaign Act, as amended, or of the Commission's regulations. Accordingly, the Commission closed its file in this matter.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
GC Report

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 19, 1991

Mr. Mark Goldstein
Warner Bros. Records, Inc.
3300 Warner Boulevard
Burbank, CA 91505-4694

RE: MUR 3318

Dear Mr. Goldstein:

On June 4, 1991, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On August 9, 1991, the Commission found, on the basis of the information in the complaint, and information provided by you, there is no reason to believe Warner Bros. Records, Inc. violated 2 U.S.C. §§ 441b, 441d or any other section of the Federal Election Campaign Act, as amended, or of the Commission's regulations. Accordingly, the Commission closed its file in this matter.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
GC Report

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3318

DATE FILMED 9/5/91 CAMERA NO. 3

CAMERAMAN AS

11405513