



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MJR # 3556

DATE FILMED 4/21/93 CAMERA NO. 2

CAMERAMAN E.E.S.

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OGC 5180

MUR 3556

Bobby R. Burchfield
General Counsel
(202) 336-7110

July 14, 1992

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE
92 JUL 14 PM 4:59

VIA HAND DELIVERY

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

Re: Complaint by President George Bush,
et al. against Floyd Brown, et al.

Dear Mr. Noble:

On behalf of President George Bush, Bush-Quayle '92 Primary Committee, Inc., and Bush-Quayle '92 Compliance Committee, Inc. (collectively "Bush-Quayle 92"), this Complaint is hereby submitted pursuant to 11 C.F.R. § 111(4)(a) and 2 U.S.C. § 437g(a)(1) against the following Respondents: Floyd G. Brown, the "Presidential Victory Committee," and the fundraising project "Citizens for Bush." The basis for this Complaint is that Respondents have engaged in a pattern of misleading and deceptive fundraising and expenditure activities in violation of 11 C.F.R. § 110.11(a)(1)(iii), 2 U.S.C. § 441d, 11 C.F.R. § 102.14(a), and 2 U.S.C. § 432(e)(4) and (5). In addition, there is reason to believe that Mr. Brown has violated a Conciliation Agreement approved by the Federal Election Commission (the "Commission") on October 1, 1990. Because Respondents' activities are causing immediate and potentially irreparable harm to the President's re-election campaign, Bush-Quayle 92 respectfully urges expedited consideration of this Complaint.

SUMMARY OF ALLEGATIONS

As detailed below, Mr. Brown and the other Respondents began an effort earlier this year to raise millions of dollars to

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Lawrence M. Noble, Esq.
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support "independent expenditures" purportedly on behalf of the President's re-election campaign. In support of that effort, Respondents engaged in mass mailings to thousands of potential contributors throughout the United States. Complainant has recently obtained incontrovertible evidence that these mailings have seriously misled numerous contributors into believing that their contributions would go directly to the President's authorized re-election campaign committee. Moreover, Respondents have used the money raised to support selected Congressional and Senatorial candidates rather than President Bush. Finally, Respondents have used these deceptively-induced contributions to further their campaign of unethical and reprehensible campaign tactics.

Because of Respondents' evident attempt to associate themselves with Bush-Quayle 92, these efforts are causing severe harm to the President's re-election effort. Even though Bush-Quayle 92 has undertaken every conceivable action short of litigation before this Commission to prevent Respondents' activities, their activities have continued. Immediate action by this Commission is essential.

STATEMENT OF FACTS

A. Mr. Brown's Activities in 1988.

As indicated in the Conciliation Agreement accepted by a vote of 5 to 0 by this Commission on October 1, 1990 in MUR 2638, during the 1988 Presidential campaign the National Security Political Action Commission ("NSPAC") was formed as a "independent expenditure committee" to support the election of then-Vice President George Bush as President. NSPAC engaged in extensive fundraising activities, eventually claiming to have raised over \$10 million in support of its effort. It distributed 173,795 "AMERICANS FOR BUSH" posters and yard signs. Because those posters and yard signs did not contain a statement disclosing that they were not authorized by George Bush or by the George Bush for President, Inc., Committee, the Conciliation Agreement concluded that "Respondents violated 2 U.S.C. § 441d(a)." The Commission assessed a civil penalty of \$6,000, approximately 12% of the \$51,552.26 paid by NSPAC for the posters and yard signs.

In at least two press conferences and on a videotape distributed to potential contributors, Mr. Brown has publicly touted his affiliation with NSPAC's efforts in 1988. He is, we respectfully submit, fully aware of and bound by the terms of the Conciliation Agreement. (A copy of the videotape is enclosed

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Page 3

as Physical Exhibit No. 1.) He cannot be allowed to engage in even more egregious activities by simply forming a different committee.

B. Respondents' Activities in 1992.

On February 10, 1992, the "Presidential Victory Committee" filed a Statement of Organization with this Commission naming John A. Fitch as Treasurer. (See Exhibit A.) It amended that Statement of Organization on March 23, 1992, naming David Bossie as Treasurer (Exhibit B). On information and belief, Respondents promptly began soliciting funds under the name "Citizens for Bush."

C. The Extensive Efforts of Bush-Quayle 92 To Repudiate and Prevent Respondents' Activities.

As soon as Bush-Quayle 92 became aware of Respondents' fundraising activities, President Bush directed the undersigned to send a letter to Mr. Brown demanding that he "and any persons associated with [him] immediately cease any and all activities undertaken in the name of 'Citizens for Bush,' 'Presidential Victory Committee,' or any similar designation that raises the possibility of confusing your efforts with those of Bush-Quayle 92." (Letter from Bobby R. Burchfield to Floyd Brown dated March 9, 1992, attached as Exhibit C.) This letter was widely circulated within the Bush-Quayle 92 campaign headquarters and to the news media.

Shortly thereafter, I issued memoranda repudiating Respondents' activities to the Bush-Quayle 92 State Chairmen on March 17, 1992 (Exhibit D), to the Bush-Quayle 92 Finance Committee on April 1, 1992 (Exhibit E), and to the Republican Party State Chairmen on April 28, 1992 (Exhibit F). On Thursday, April 30, 1992, my memorandum to the Bush-Quayle 92 State Chairmen was attached to the Bush-Quayle 92 daily "Campaign Briefing," which is distributed to hundreds of persons throughout the country. (Exhibit G.)

Meanwhile, on March 23, 1992, William J. Olson, Esq., writing on behalf of Respondents, responded to my letter dated March 9, 1992. Mr. Olson opined that Respondents' activities "are entirely proper under Federal Election law." While agreeing to make the disclaimer on Respondents' fundraising letters more explicit, Mr. Olson refused on behalf of Respondents to cease

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Lawrence M. Noble, Esq.
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Page 4

their offensive activities. (Letter from William J. Olson to Bobby R. Burchfield dated March 23, 1992, Exhibit H.) For a short time thereafter, some of Respondents' fundraising literature carried the following more explicit disclaimer: "Citizens for Bush is a project of Presidential Victory Committee and is an Independent Expenditure effort not affiliated in any way with Bush-Quayle '92." (Exhibit I.) On information and belief, Respondents used this disclaimer for a very brief time. As shown by the attached letter dated June 25, 1992, Respondents have returned to their earlier ambiguous disclaimer: "Paid for by the Presidential Victory Committee, and not authorized by any candidate or candidate's committee." (Letter from Floyd G. Brown to Mr. Caleb C. Curtis dated June 25, 1992, Exhibit J.)

On or about April 9, 1992, Commission Chairman Joan D. Aikens issued a Notice of Proposed Rulemaking. That notice requested comments by May 15, 1992 on two proposed rules, summarized as follows:

"Under the first, the political committee sponsoring the project will be required to include in the required disclaimer the name of the committee paying for the project, as well as a statement of whether the project had been authorized by the candidate whose name appeared in the title, or by any other candidate. Second, the committee could not accept checks received in response to the special project unless they were made payable to the registered name of the committee. All other checks would have to be returned or refunded." 57 Fed. Reg. No. 73 (April 15, 1992) at p. 13506-58.

On May 15, 1992, Bush-Quayle 92 submitted comments supporting the proposed amendments. Specifically referring to Respondents' efforts, we stressed that the amendments would help to "avoid any confusion about the ultimate beneficiary of the funds raised by such a special fundraising project." Our comments further expressed the concern that "these projects have the potential to mislead contributors into believing that the money raised will go directly to the candidate for whom they are named. Persons viewing advertisements by these groups may be similarly confused." (Letter from Bobby R. Burchfield to Susan E. Propper dated May 15, 1992, Exhibit K.)

On or about May 19, 1992, the Bush-Quayle 92 Compliance Committee, Inc. mailed a fundraising letter from George W. Bush, President Bush's eldest son. Under the heading "A Special Notice

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Lawrence M. Noble, Esq.
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Page 5

From George W. Bush," Mr. Bush wrote to each of the 85,697 recipients of that letter:

"Many of my father's best supporters are receiving solicitations from an organization by the name of Citizens for Bush. *This group and its chairman Floyd Brown have absolutely nothing to do with the President's official campaign and we do not in any way support their efforts. In fact, this group, Citizens for Bush, may actually damage the President's re-election efforts.*

"I want to strongly encourage you not to contribute or support the Citizens for Bush organization. The single best way you can help President Bush is by contributing to the Compliance Fund." (Exhibit L, emphasis added.)

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Over the last four months, I have written to each of the 364 contributors listed in Respondents' reports to the Federal Election Commission advising each of them that Respondents are not affiliated with or condoned by the President or Bush-Quayle 92. See Advisory Opinion No. 1984-2, 1 Fed. Elect. Campn. Fin. Guide (CCH) ¶ 5748 (Feb. 13, 1984). Those letters also advised the contributors that they may ask for their money back if they were misled by Mr. Brown's solicitation. (An exemplary letter to Dr. Daniel R. Stough dated May 19, 1992 is attached as Exhibit M.) In response to those letters, numerous contributors have requested refunds from Respondents on the basis that they were misled by Respondents' solicitations. Eleven of those contributors have forwarded copies of their letters to me, and copies of those letters are attached as Exhibit N. Several contributors have sent checks payable to "Citizens for Bush" directly to Bush-Quayle 92. (Exhibit O.) It is now beyond question that Respondents' fundraising efforts are misleading numerous contributors into believing that their contributions are destined for the President's re-election campaign.

Bush-Quayle 92 has also acted promptly to correct suggestions by the press that we condone Mr. Brown's activities. In response to an article in the March 30, 1992 edition of Newsweek suggesting that the campaign condones Respondents' activities, I wrote a letter to the editor dated March 26, 1992. That letter was published in the April 13, 1992 issue of Newsweek. (Exhibit P.) In response to a story about Respondents by Bill Plante on the March 30, 1992 CBS Evening News, I wrote a letter dated March 31, 1992, pointing out the "inaccuracies and misleading implications" of the story, and its failure to mention

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Page 6

our demand that Mr. Brown immediately cease his activities. (Exhibit Q.) I sent another letter to CBS on July 13 concerning another story about Mr. Brown. (Exhibit R.)

On July 8, 1992, Bush-Quayle 92 received word that Mr. Brown would soon begin running television advertisements attacking Governor Bill Clinton. Again, we acted promptly and unequivocally to demand that Mr. Brown immediately cease those scurrilous activities. I wrote to Mr. Brown on July 9, 1992, stating:

"On behalf of President Bush and Bush-Quayle 92, I strongly urge you to cease these activities. It is the policy of this campaign to keep tabloid sleaze out of this election campaign. Your attempt to resurrect these charges against Governor Clinton is absolutely despicable, and neither the President nor his campaign staff condone it in any way." (Letter from Bobby R. Burchfield to Floyd Brown, dated July 9, 1992, attached as Exhibit S.)

On Friday, July 10, 1992, President Bush appeared on the *McNeil-Lehrer News Hour*. When asked about Respondents' activities, the President responded unequivocally:

"We've had our lawyers in touch with him and told him to stop it. And I repudiate it now as the kind of sleaze that diminishes the political process.

". . . I hope what I'm telling you now resonates all across this country. I disapprove of it, our lawyers have told him to stop it, and I hope he does, and I'm going to try to keep this campaign on the issues." (Transcript attached as Exhibit T.)

D. Other Misleading Representations

Respondents have led contributors to believe that "every dollar" contributed to Respondents will be used to support the President's re-election effort. Indeed, in a letter sent by Floyd Brown to "My Fellow Conservative", and forwarded by the recipient to Bush-Quayle 92 in early March, Respondents flatly stated:

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Page 7

"Every dollar you contribute will help Citizens for Bush fight to keep George Bush in the White House." (Exhibit U.)

In fact, as of May 31, 1992, Respondents had raised \$679,752.34 and (on information and belief) had not run a single advertisement. It would appear that Respondents' effort is doing little more than sustaining its principals and its direct mail effort.

And, after raising hundreds of thousands of dollars under the pretense of supporting the President's re-election effort, Respondents have made contributions to 6 Congressional and 1 Senatorial candidates. Presidential Victory Committee Report of Receipts and Disbursements, Schedule B at p. 1 (filed June 24, 1992). It is extremely misleading for Respondents to tell their contributors that their money will be used to help re-elect the President, and then in fact to use that money to support Senatorial and Congressional candidates.

VIOLATIONS

Our position is straight-forward and simple: Having done all else legally permissible to preclude Respondents' misleading and unethical activities, Bush-Quayle 92 now comes to the Federal Election Commission for immediate relief on the following grounds:

1. Respondents' fundraising disclaimers are ambiguous and clearly inadequate to satisfy the terms and objectives of 11 C.F.R. § 110.11(a)(1)(iii). The obvious purpose of the statutory disclaimer requirement and the attendant regulation is to advise contributors who will receive their donation. The regulation states that any communication that is "not authorized by a candidate, authorized committee of a candidate or its agent, shall clearly state that the communication has been paid for by such person and is not authorized by any candidate or candidate's committee." In the October 1, 1990 Conciliation Agreement (MUR 2638), the National Security Political Action Committee ("NSPAC") agreed that certain posters and yard signs "did not contain a statement disclosing that they were not authorized by George Bush, or by the George Bush for President, Inc. Committee." Conciliation Agreement at p. 5. As part of that Agreement, NSPAC agreed to pay a civil penalty of \$6,000. Mr. Brown has publicly touted his affiliation with NSPAC in at least two press conferences.

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Lawrence M. Noble, Esq.
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The documentation submitted as Exhibit N is strong and incontrovertible that Respondents' current disclaimer is inadequate to inform potential contributors of Respondents' identity and their lack of affiliation with Bush-Quayle 92. Respondents strengthened their disclaimers, but reverted to the misleading one apparently as a result of disappointing fund-raising results. In view of the numerous contributors who have demanded refunds upon being apprised that Respondents are not affiliated with Bush-Quayle 92, we respectfully submit that this Commission has the authority to require a corrective mailing to all contributors, both those listed on the FEC Reports as having contributed more than \$200, and the numerous other contributors who contributed less than \$200 and are thus not listed on the FEC reports.

2. Respondents have misled their contributors about the purpose for which they will use the contributions. By stating that "every dollar you contribute will help Citizens for Bush fight to keep George Bush in the White House," and then spending substantial sums of money in support of Congressional and Senatorial candidates, Respondents are engaged in intentionally deceptive activities. The very name of the fundraising project, "Citizens for Bush," is extremely misleading in this context.

PRAYER FOR RELIEF

Accordingly, President Bush, Bush-Quayle '92 Primary Committee, Inc., and Bush-Quayle '92 Compliance Committee, Inc. hereby urge this Commission to take the following actions:

1. Initiate on an expedited basis an investigation into the allegations of this Complaint;

2. Order Respondents to (a) mail notices to each contributor stating that they are not affiliated in any manner with Bush-Quayle 92 or with the President's re-election campaign; (b) make a full and prompt refund to any contributor who states in writing that he or she contributed to Respondents under the false impression of such an affiliation; and (c) state in the text of all future fundraising literature in bold type no smaller than pica-sized type that "NEITHER PRESIDENT BUSH NOR BUSH-QUAYLE 92 HAS AUTHORIZED OR CONDONED THE FORMATION OR ACTIVITIES OF 'PRESIDENTIAL VICTORY COMMITTEE' OR 'CITIZENS FOR BUSH'";

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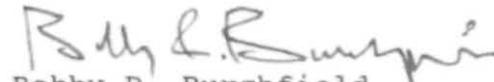
Lawrence M. Noble, Esq.
July 14, 1992
Page 9

3. Impose a substantial civil penalty on Respondents, and Floyd Brown personally, for the foregoing violations of the Federal Election laws; and

4. Initiate proceedings in the United States District Court to enforce the October 1, 1990 Conciliation Agreement against Mr. Brown, seeking all appropriate relief including an injunction.

Please let me know if you need any further information in connection with this Complaint.

Sincerely,


Bobby R. Burchfield

I hereby certify that the foregoing Statement of Facts is true and correct to the best of my knowledge, information, and belief.


Bobby R. Burchfield

SUBSCRIBED AND SWORN TO before me this 14th day of July 1992.


Notary Public

My Commission Expires
September 30, 1996

My Commission expires: _____

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FEDERAL COMMISSION
FEDERAL RESERVE SYSTEM
OFFICE

92 JUL 14 PM 5:00

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STATEMENT OF ORGANIZATION

(See instructions side of this form.)

1 (a) NAME OF COMMITTEE IN FULL (Check if name is changed) **Presidential Victory Committee** DATE **92 FEB 10 PM 4 23**

(b) Number and Street Address (Check if address is changed) **1815 H Street, N.W., Suite 600** DATE **February 7, 1992**

(c) City, State and ZIP Code **Washington, D.C. 20006** FEC IDENTIFICATION NUMBER

4 IS THIS STATEMENT AN AMENDMENT? YES NO

5 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.

Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship
None		

6 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
John A. Fitch	1815 H Street, N.W., Suite 600 Washington, D.C. 20006-3604	Executive Director Assistant 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
Robert Miller	Miller & Roos 1200 Third Avenue, Suite 700 San Diego, California 92101-4106	Treasurer
John A. Fitch	see above	Assistant 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
George Mason Bank	Main Street Fairfax, Virginia 22030

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 John A. Fitch	SIGNATURE OF TREASURER <i>John A. Fitch, Assistant Treasurer</i>	DATE 2/10/92
--	---	-----------------

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.

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RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

MAR 23 9 13 AM '92

GILMAN, OLSON & PANGIA
ATTORNEYS AT LAW
1828 K STREET, NORTHWEST
WASHINGTON, D.C. 20006-0804
BOX 468-8-00
FACSIMILE BOX 13-0988

NICHOLAS GILMAN, PC, DC, MD, PA
WILLIAM J. OLSON, PC, DC, VA
MICHAEL J. PANGIA, PC, DC, NY

OF COUNSEL:
GUY O. PARLEY, JR, VA
JOHN S. MILES, DC, MD
LINDA S. BORSKY, MA

*CERTIFIED MAIL SPECIALIST BY NETA

DUFE 20
4000 ADELPHI DRIVE
FEDERAL RESERVE BANK
POB 99-0000

DUFE 000
4000 ADELPHI DRIVE
PHILADELPHIA, PENNSYLVANIA 19104
DUFE 000-0000

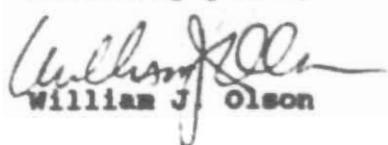
March 20, 1992

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

Re: **Presidential Victory Committee**
FEC Identification Number C00260299
Amendment to FEC Form 1

Dear Sir:

Please accept for filing the enclosed Amendment to FEC Form 1 (Statement of Organization) dated March 20, 1992 for the Presidential Victory Committee.

Sincerely yours,

William J. Olson

WJO:nh
Enclosure

92037490141

STATEMENT OF ORGANIZATION

(See reverse side for instructions)

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

1 (a) NAME OF COMMITTEE IN FULL <input type="checkbox"/> (Check if name is changed) Presidential Victory Committee	2 DATE MARCH 20 1992 AM '92
(b) Number and Street Address <input checked="" type="checkbox"/> (Check if address is changed) 38 Ivy Street, S.E., Suite A	3 FEC IDENTIFICATION NUMBER C00260299
(c) City, State and ZIP Code Washington, D.C. 20003	4 IS THIS STATEMENT AN AMENDMENT? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

5 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.

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
David Bossie	38 Ivy Street, S.E., Suite A Washington, D.C. 20003	Assistant 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
David Bossie	38 Ivy Street, S.E., Suite A Washington, D.C. 20003	Assistant 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
First Interstate Bank	401 B Street San Diego, California 92101

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 David Bossie	SIGNATURE OF TREASURER 	DATE 3/20/92
---	----------------------------	-----------------

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 202-378-3120

FEC FORM 1
(revised 4/87)

920374501420

Exhibit C

23040935101



Bobby R. Burchfield
General Counsel
(202) 336-7110

March 9, 1992

Mr. Floyd Brown
38 Ivy Street, S.E.
Suite A
Washington, D.C. 20003

Dear Mr. Brown:

3040235102

The President has asked me to send this letter demanding that you and any persons associated with you *immediately cease any and all activities* undertaken in the name of "Citizens for Bush," "Presidential Victory Committee," or any similar designation that raises the possibility of confusing your efforts with those of Bush-Quayle '92.

We first learned of your activities last week when we received a letter signed by you soliciting funds in the name of "Citizens for Bush: A Project of Presidential Victory Committee." Your group has neither asked for nor received permission to solicit funds using the name of President Bush. Your letter appears intended to lead recipients to the false belief that their contributions are for the use of the President's re-election effort through such statements as "every dollar you contribute will help Citizens for Bush fight to keep George Bush in the White House." The "disclaimer" in your letter is at best ambiguous, and nowhere in the text of the four page letter does it even attempt to make clear that your organization has no affiliation or contact with Bush-Quayle '92. The President strongly disapproves of this misleading use of his name and reputation.

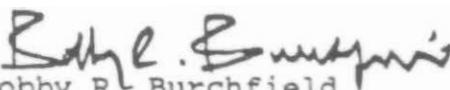
I understand that you were involved with a similar effort called "Americans for Bush" in 1988. That group failed to heed the campaign's instructions to cease raising and spending money under that name. Even though Bush-Quayle '88 took precautions to avoid any contact or association with your group, your

Mr. Floyd Brown
March 9, 1992
Page Two

activities resulted in protracted litigation before the Federal Election Commission and now in the United States District Court. I urge that you learn a lesson from this history and immediately cease your activities.

In the event I do not receive notification within ten (10) business days of this letter that you have ceased any and all activities that might mistakenly be attributed to Bush-Quayle 92, I will be forced to take further action such as initiation of proceedings before the Federal Election Commission and the Internal Revenue Service. I will look forward to your prompt reply.

Sincerely,


Bobby R. Burchfield

cc: The President of the
United States

23040935104

Exhibit D



Bobby R. Burchfield
General Counsel
(202) 336-7195

M E M O R A N D U M

TO: Bush - Quayle '92 State Chairmen
FROM: Bobby R. Burchfield, General Counsel *BRB*
RE: Unauthorized use of the President's name.
DATE: March 17, 1992

=====

Please take notice that Bush - Quayle '92 Primary Committee, Inc. with its affiliate committee, Bush - Quayle '92 Compliance Committee, Inc., ("Bush - Quayle '92") is the principal campaign committee of the President. As such, it is the only entity authorized to raise and spend money on behalf of the President's re-election.

At present a number of groups are attempting to raise money under the guise of assisting the President's re-election. These groups, utilizing such names as "Citizens for Bush," "Presidential Victory Committee," and "Americans for Bush," are soliciting funds by creating a false belief that their contributions are for the use of the President's re-election effort. These groups are not endorsed, approved or authorized by Bush - Quayle '92, and the President has demanded that they cease their misleading fundraising activities.

If you receive any inquires about any of these groups, please state that Bush - Quayle '92 is the President's only authorized re-election committee. No other committees or persons are authorized to solicit or spend money on his behalf.

Should you have any questions about this matter, please do not hesitate to contact me directly.

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Exhibit E



Bobby R. Burchfield
General Counsel
(202) 336-7110

M E M O R A N D U M

TO: Bush - Quayle '92 Finance Committee
FROM: Bobby R. Burchfield, General Counsel *BL*
RE: Unauthorized use of the President's name.
DATE: April 1, 1992

=====
Please take notice that Bush - Quayle '92 Primary Committee, Inc. with its affiliate committee, Bush - Quayle '92 Compliance Committee, Inc., ("Bush - Quayle '92") is the principal campaign committee of the President. As such, it is the only entity authorized to raise and spend money on behalf of the President's re-election.

At present a number of groups are attempting to raise money under the guise of assisting the President's re-election. These groups, utilizing such names as "Citizens for Bush," "Presidential Victory Committee," and "Americans for Bush," are soliciting funds by creating a false belief that their contributions are for the use of the President's re-election effort. These groups are not endorsed, approved or authorized by Bush - Quayle '92, and the President has demanded that they cease their misleading fundraising activities.

If you receive any inquires about any of these groups, please state that Bush - Quayle '92 is the President's only authorized re-election committee. No other committees or persons are authorized to solicit or spend money on his behalf.

Should you have any questions about this matter, please do not hesitate to contact me directly.

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Exhibit F



Bobby R. Burchfield
General Counsel
(202) 336-7110

M E M O R A N D U M

TO: Republican State Party Chairmen
FROM: Bobby R. Burchfield, General Counsel *RB*
RE: Unauthorized use of the President's name.
DATE: April 28, 1992

=====
Please take notice that Bush - Quayle '92 Primary Committee, Inc. with its affiliate committee, Bush - Quayle '92 Compliance Committee, Inc., ("Bush - Quayle '92") is the principal campaign committee of the President. As such, it is the only entity authorized to raise and spend money on behalf of the President's re-election.

At present a number of groups are attempting to raise money under the guise of assisting the President's re-election. These groups, utilizing such names as "Citizens for Bush," "Presidential Victory Committee," and "Americans for Bush," are soliciting funds by creating a false belief that their contributions are for the use of the President's re-election effort. These groups are not endorsed, approved or authorized by Bush - Quayle '92, and the President has demanded that they cease their misleading fundraising activities.

If you receive any inquires about any of these groups, please state that Bush - Quayle '92 is the President's only authorized re-election committee. No other committees or persons are authorized to solicit or spend money on his behalf.

Should you have any questions about this matter, please do not hesitate to contact me directly.

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—
Exhibit G

HEADLINES

- Index of leading economic indicators rises 0.2 percent in March; factory orders in March jump 1.6 percent, strongest in five months; first-time unemployment claims remain unchanged (AP, 4/30)

TODAY'S SCHEDULE

President Bush meets with U.S. Attorney General William Barr. The President meets with Cancer Courage Award recipients; attends President's Council on Physical Fitness and Sports event in Columbus, Ohio; addresses Ohio Association of Broadcasters; attends Bush-Quayle fundraising dinner in Columbus.

Vice President and Mrs. Quayle tour Tisch Hospital, New York Medical Center, in New York City; Vice President meets with U.N. Secretary-General Boutros-Ghali at U.N.; Vice President and Mrs. Quayle attend Bush/Quayle fund-raising dinner in New York City.

First Lady Barbara Bush attends annual celebration of "Reading is Fundamental" at Kennedy Center in Washington, D.C.

NEWS IN BRIEF**REGULATORY MORATORIUM BENEFITS**

ECONOMY "Over-regulation costs jobs," President Bush explained on Wednesday as he announced a 120-day extension of the regulatory moratorium. "The economy is beginning to recover now. To ensure that recovery continues and is strengthened, to ensure that we can create new jobs, we must continue our course of regulatory reform," added the President. Bush also ordered that more regulations be subject to increased scrutiny. (AP, 4/29)

"We are serious when we say that this society of ours, this economy of ours is over-regulated," said Vice President Dan Quayle. "Regulations cost the consumers of America about \$400 billion a year.... We are going to look very seriously at the regulations we have and remove those that are simply no longer necessary or reform those that need some reforming. That's in the best interest of the economy and the best interest of consumers." (CNN's Moneyline, 4/29)

Senator Hank Brown [R-CO] yesterday praised the President's extension of the moratorium, saying it will encourage economic growth while still protecting consumers: "We can protect consumers -- and Coloradans -- but we can also do it in a way that doesn't increase unemployment and increase costs." (4/30)

**FOLLOWING VERDICT,
PRESIDENT BUSH CALLS FOR
CALM, END OF VIOLENCE**

President George Bush held a press conference today to express his concerns following the verdict in the Rodney King case and last night's violence in Los Angeles. The President said the verdict "has left us all with a deep sense of personal frustration" and appealed for calm.

President Bush said, "The U.S. Department of Justice will continue its criminal investigation of the police violence case in Los Angeles to ensure that the civil rights laws of this nation are fully and equally applied to all individuals under the Constitution. The Department of Justice has been monitoring this case since its inception...[and] moved last night to accelerate the investigation it started several months ago."

President Bush talked this morning with California Governor Pete Wilson, Los Angeles Mayor Tom Bradley, and senior members of the President's administration. "We are concerned about any question of excessive police violence, and we are equally concerned about public violence. The murder and destruction in the streets of Los Angeles last night and today must be stopped," the President said.

President Bush outlined four principles of law and behavior:

- First, we must maintain a respect for our legal system and a demand for law and order.
- Second, we have a right to expect a police force that protects our citizens and behaves in a responsible manner.
- Third, in the American conscience there is no room for bigotry and racism.
- Fourth, we have responsibilities as citizens of this democracy. I want everyone to know that the federal government will continue to pursue its legal responsibilities in this case.

GOVERNMENT REGULATION: STRANGER THAN FICTION

Have you heard the one about.....

- The federal regulation which said that taking a shower can be bad for your health? (Uncle Sam was convinced that chloroform, found in bath water, might be a carcinogen)
- The federal regulation which said that "An Apple a Day"...could make you ill? (That's because apples contained Alar)

Stranger than fiction, these are actual examples of how government over-regulation interferes in the day-to-day lives of Americans. This bureaucratic intrusion does more than cramp our lifestyles. It tramples the American dream by stifling productivity, discouraging creativity and punishing consumers, workers, average Americans - the very people government is supposed to be working for, not against.

That's why President Bush first ordered a 90-day moratorium on new federal regulations in his State of the Union Address. And that's why the President yesterday extended that moratorium for another four months. For another day brings the threat of another inane federal regulation.

"Let me tell you what this means in the real world," the President said. "Inflexible safety rules can undermine safety in unforeseen ways: If government mandates make ladders more and more costly to consumers...., people will turn to cheaper substitutes. They'll climb on chairs and step-stools -- which are far less safe.... Regulators creating such a rule would not intend to make people less safe -- but that's how it works in practice."

THE ABC'S OF REFORM

Each year, over-regulation takes about \$400 billion out of our pockets in the form of paperwork, red tape and higher prices passed on to consumers. President Bush wants to put an end to this "hidden tax" on society. Regulatory reform means:

Delivering on a promise to bring fundamental reform to government;

Ensuring that the economic recovery continues and is strengthened;

Rolling back regulations that impose a hidden tax on all Americans;

Every federal agency should have a reform agenda by August 28;

Guaranteeing a veto whenever Congress tries to over-regulate our homes.

NEWS IN BRIEF continued

GOP WELFARE REFORM BILL ANNOUNCED Congressman Newt Gingrich [R-GA] and other Congressional Republicans Tuesday announced the introduction of a GOP-sponsored welfare reform bill that would require recipients to work or go to school in order to receive their benefits. Gingrich said the proposal would provide *"the kind of dramatic change that would replace the welfare state."* *"It's a 'tough love' approach to restore the work ethic,"* said Representative Vin Weber [R-MN]. *"But we need to give people time to train for jobs and for an orderly transition."* (AP, 4/28; Washington Times, 4/29)

CLINTON TIED TO STATUS-QUO HILL INSIDERS On Wednesday, National Republican Congressional Committee Co-Chairman E. Spencer Abraham joined several Republican congressmen in blasting Democratic presidential candidate Bill Clinton for *"portraying himself as an outsider while making deals with Democratic insiders on Capitol Hill."* Rep. Rod Chandler [R-WA] agreed: *"Don't believe it for one minute that Bill Clinton is an outsider. He's in there cutting a deal to get their votes and the American people will be the losers for it."* Added Rep. Bob Dornan [R-CA]: *"Here he is pandering to the liberal leaders in this Congress that have had no agenda for 38 years but taxing and spending and spending some more and taxing some more."* (4/29)

STATEWATCH

INDIANA BUSH/QUAYLE TEAM NAMED Senators Dan Coats and Richard Lugar of Indiana will serve as honorary chairmen for the Indiana re-election effort of President Bush and Vice President Quayle. They'll be joined by Rexford Early, chairman of the state Republican Party. Bill Neale will serve as Bush/Quayle state general chairman. (AP, 4/30)

RACING GREAT RICHARD PETTY ENDORSES BUSH Racing legend and North Carolina native Richard Petty Wednesday endorsed President Bush's re-election and urged all North Carolinians to get out and support the President: *"President Bush...has been there through tough times and has been tested. He continually has shown us he is steady under pressure and calm in a storm. That's the kind of leadership America has to have to keep us competitive and strong."* (4/29)

For draft news releases, news conference statements, letters to the editor, speeches, op-eds, and talking points, please call the STATE PRESS OPERATIONS DESK at 202/336-7294.

PRODUCED BY: Bush-Quayle '92, Communications Division
1030 15th Street, NW Washington, D.C. 20005 (202) 336-7155



Bobby R. Burchfield
General Counsel
(202) 336-7195

M E M O R A N D U M

TO: Bush - Quayle '92 State Chairmen
FROM: Bobby R. Burchfield, General Counsel *BRB*
RE: Unauthorized use of the President's name.
DATE: March 17, 1992

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Please take notice that Bush - Quayle '92 Primary Committee, Inc. with its affiliate committee, Bush - Quayle '92 Compliance Committee, Inc., ("Bush - Quayle '92") is the principal campaign committee of the President. As such, it is the only entity authorized to raise and spend money on behalf of the President's re-election.

At present a number of groups are attempting to raise money under the guise of assisting the President's re-election. These groups, utilizing such names as "Citizens for Bush," "Presidential Victory Committee," and "Americans for Bush," are soliciting funds by creating a false belief that their contributions are for the use of the President's re-election effort. These groups are not endorsed, approved or authorized by Bush - Quayle '92, and the President has demanded that they cease their misleading fundraising activities.

If you receive any inquires about any of these groups, please state that Bush - Quayle '92 is the President's only authorized re-election committee. No other committees or persons are authorized to solicit or spend money on his behalf.

Should you have any questions about this matter, please do not hesitate to contact me directly.

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Exhibit H

GILMAN, OLSON & PANGIA

ATTORNEYS AT LAW

1815 H STREET, NORTHWEST

WASHINGTON, D.C. 20006-3604

(202) 466-5100

FACSIMILE (202) 331-8966

NICHOLAS GILMAN, P.C. (DC, MD, PA)
WILLIAM J. OLSON, P.C. (DC, VA)
MICHAEL J. PANGIA, P.C. (DC, NY)

OF COUNSEL

GUY O. FARLEY, JR. (VA)
JOHN S. MILES (DC, MD)
LINDA B. BORSKY (GA)

*CERTIFIED TRIAL SPECIALIST BY NETA

SUITE 310
10521 JUDICIAL DRIVE
FAIRFAX, VIRGINIA 22030
(703) 591-9200

SUITE 500
1420 WALNUT STREET
PHILADELPHIA, PENNSYLVANIA 19102
(215) 546-4300

March 23, 1992

HAND DELIVER

Bobby R. Burchfield, Esquire
General Counsel
Bush-Quayle '92 Primary Committee, Inc.
1030 15th Street, N.W.
Washington, D.C. 20005

Dear Mr. Burchfield:

Our firm represents The Presidential Victory Committee (PVC). Our client has received your letter of March 9, 1992, to Mr. Floyd G. Brown, demanding that our client cease any and all activities undertaken in the name of "Citizens for Bush," "Presidential Victory Committee," or any other name that raises the possibility of confusing our client's efforts with those of Bush-Quayle '92.

It is true, as you say, that PVC has neither asked nor received permission to solicit funds using the name of President Bush. In fact, it is our view that soliciting such permission could raise an argument that the independence of this Independent Expenditure effort would be tainted.

Our client does not believe that the use of the names you object to cause any such confusion. There is specific language in all solicitations and other material issued by PVC that Citizens for Bush is a project of Presidential Victory Committee and that no candidate or authorized campaign committee has endorsed Presidential Victory Committee. We do not agree that use of the name of President Bush is misleading. Rather, it is accurately descriptive of this Independent Expenditure. Nevertheless, our client has decided to add even further language to its letters to disavow any connection with your committee, and this will be done on future mailings.

Furthermore, it is our view that the activities of Presidential Victory Committee, including the name of the

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Committee and its project, are entirely proper under Federal Election Law. If you are aware of any law to the contrary, we would appreciate being so advised.

Our client believes that under the U.S. Constitution and the Federal Election Campaign Act it has the right to undertake this Independent Expenditure effort. Although our client would always be willing to consider further steps to ensure that no contributor could ever be misled, it believes none are being misled, and it would resist any effort to coordinate this Independent Expenditure in any way with your campaign.

Sincerely yours,



William J. Olson

WJO:smr

cc: Mr. Floyd G. Brown

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Exhibit 1



CITIZENS FOR BUSH
 A PROJECT OF
PRESIDENTIAL VICTORY COMMITTEE

My Fellow Conservative,

As Chairman of the Presidential Victory Committee's Citizens for Bush national campaign, I have sent you a copy of my personal check for \$92.

A check that I have made out directly to the Presidential Victory Committee.

I ask you today, for America, to at least match my own donation to the Presidential Victory Committee's special election-year project, Citizens for Bush.

That's all I want.

I want you to match my conviction and honor.

With dedication and responsibility, I ask you to help re-elect George Bush as President for three crucial reasons:

First, George Bush is a president of honor, integrity and devotion to everything you hold dear.

Second, George Bush has devoted his entire life to the service of America.

And third, George Bush knows how to stand up to the liberals in Congress who only want to spend and tax.

You know as well as I that if anyone other than George Bush is elected to the White House in November, it will spell disaster for America.

Let me quickly explain to you why Citizens for Bush, the Presidential Victory Committee's premier election-year project, is so important to America.

Citizens for Bush, a very special project of the Presidential Victory Committee, has only one goal:

To help make sure George Bush is re-elected President of the United States in November.

And as National Chairman of Citizens for Bush, I am completely committed to this battle.

I have sacrificed everything for the sake of Citizens

38 Ivy Street S.E., Suite A * Washington, D.C. 20003

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for Bush.

You can clearly see what this effort means to me.

You can see why I'm putting my own hard-earned money where my mouth is when it comes to Citizens for Bush.

Will you do the same?

Will you match my own contribution?

I know these are tough economic times.

But that's precisely why you and I must pool our resources to fight for America's secure future with the re-election of George Bush.

You've heard the Democrats' so-called economic plan for America.

I call it economic DISASTER for America.

Every one of the Democrat presidential candidates advocates some sort of nationally-sponsored health care plan.

And while I believe, as President Bush does, that health care is important...

...it is criminal to bankrupt America with the Democrats' socialist schemes that will not help you at all!

America is drowning in debt already, thanks to liberal spending.

Can you imagine how expensive the liberals' government-run hospitals and clinics will be?

And you know who will foot the liberals' bill.

YOU.

That's right.

You and every other faithful, hard-working American taxpayer will have to fund the liberals' outrageous programs.

You see, the Democrats' plans call for either the federal government or each state, or both, to fund their national health care bills, new welfare proposals and countless other programs.

You know as well as I that already America's federal deficit is almost \$3.5 TRILLION.

I know it's hard to even comprehend that much money, but

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that's how much the United States government owes.

Think of your own bills.

You know how tough it is sometimes to meet each payment.

Well, think of meeting a \$3.5 TRILLION payment.

And on top of that, the liberal Democrats now want to tack on the cost of a health care system which will cost HUNDREDS of BILLIONS of dollars!

My friend, I'm only using this one point to illustrate how the liberals will destroy America's economy once and for all if they gain control of the White House.

--- That's why I founded Citizens for Bush:

To fight for the sound economy President Bush has helped create for America.

And that's why I've staked all I have on this special project of the Presidential Victory Committee:

To preserve and continue America's economic recovery.

Please, stand with me now.

Stand with me and Citizens for Bush and help ensure victory in November for all you and I cherish.

You hold a copy of my personal check.

You can clearly see that I've put my own money where my mouth -- and my heart -- are.

I must ask you now to do the same.

You see that I've written this check for \$92.

All I ask is for you match my check with a check of your own made out for \$92 today.

A \$92 contribution will make you eligible for Citizens for Bush's special Victory Committee.

Likewise, if you can give \$184, you will become part of Citizens for Bush's Double Victory Committee.

If you can send a check for \$276, you will immediately become a part of the Triple Victory Committee.

And, your special \$1,000 contribution will be honored with your elevation into the President's Club.

The President's Club is Citizens for Bush's most

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exclusive committee.

It is comprised of only our most ardent supporters.

Will you accept the challenge of becoming a part of Citizens for Bush's President's Club?

I hope you understand the importance of my request.

If you cannot commit the full \$1,000 to becoming a supporter of the President's Club right now, I understand.

But your support, your contribution, be it \$92, \$184 or \$296, is absolutely vital.

You hold a copy of my personal check to the Presidential Victory Committee's special project, Citizens for Bush.

I'm asking you to return my check and at least match it with a check of your own made out for \$92.

Time is running out.

The first primaries of the season are over.

You may not believe it, but President Bush's supporters are counting the time before the national convention and election in weeks, not months.

Please, make your commitment to Citizens for Bush right now; don't waste another minute.

I hope I've explained how critical your voice is.

Rush your urgent support to me today.

Thank you.

Sincerely,

Floyd D. Brown
Floyd Brown
National Chairman

P.S. With your contribution of \$1,000, I will welcome you to the Citizens for Bush President's Club. You may also join our Triple and Double Victory Committees. But please, return and at least match my personal check with your own check for \$92. Thank you again. Your commitment is crucial.

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**OFFICIAL REPLY TO
 NATIONAL CHAIRMAN FLOYD BROWN
 CITIZENS FOR BUSH**

Dear National Chairman Brown,

Thank you for your very frank letter. I, too, realize the time for action has come. I support you and Citizens for Bush and our battle for a secure future through George Bush's re-election as President.

I am returning your check along with my own check for:

- () \$1,000 PRESIDENT'S CLUB
- () \$276 TRIPLE VICTORY COMMITTEE
- () \$184 DOUBLE VICTORY COMMITTEE
- () \$ 92 VICTORY COMMITTEE

I cannot send \$92, but to help I can send: \$ _____

Please consider me a CITIZENS FOR BUSH TEAM PLAYER.

Please make your check to: **THE PRESIDENTIAL VICTORY COMMITTEE**
 Washington, D.C. 20069-1103

NAME: _____

ADDRESS: _____

CITY/STATE/ZIP: _____

TELEPHONE: _____

*38 Ivy Street S.E., Suite A * Washington, D.C. 20003*

Paid for by the Presidential Victory Committee, and not authorized by any candidate or candidate's committee.
 Citizens for Bush is a project of Presidential Victory Committee and is an independent Expenditure effort not affiliated in any way with Bush-Quayle '92.
 Contributors to the Presidential Victory Committee are not deductible as charitable contributions for federal income tax purposes.
 The Federal Election Commission requires we ask:

Occupation: _____ Employer: _____

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NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

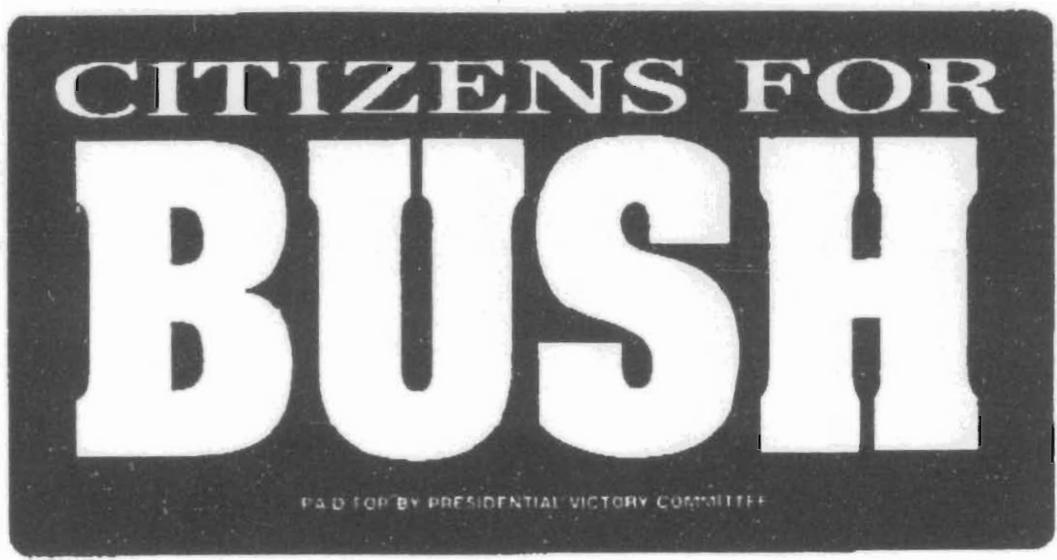
BUSINESS REPLY MAIL
FIRST CLASS PERMIT NO. 18665 WASHINGTON, D.C.

POSTAGE WILL BE PAID BY ADDRESSEE

CITIZENS FOR BUSH
A PROJECT OF PRESIDENTIAL VICTORY COMMITTEE
Washington, D.C. 20070-1103



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	FLOYD G. BROWN WASHINGTON, D.C. 20003	2017
		<i>March 10</i> 19 <i>92</i> 00-537/580
Pay To The Order Of	<i>Presidential Victory Committee</i>	92.00
	<i>Ninetytwo and 00/100</i>	Dollars
PATRIOT NATIONAL BANK OF RESTON RESTON, VA 22090		
For	<i>Citizens for Bush</i>	<i>Floyd G. Brown</i>

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Floyd G. Brown
National Chairman

June 25, 1992

Mr. Caleb C. Curtis
PO Box 823
Rancho Santa F, CA 92067-0823

Dear Mr. Curtis,

I hope this certified letter hasn't caused you any inconvenience, but I can't wait until November.

I need your vote for President now!

The latest poll results show President Bush IN SECOND PLACE!

That's right, Mr. Curtis. President Bush now trails Ross Perot in the polls.

That's why I need you to complete the official Presidential Victory Committee Ballot I've sent you and RUSH it back to me.

And, Mr. Curtis, you must do this today.

Because if the election were today, President George Bush would lose!

In California, the biggest electoral-vote prize in America, George Bush is losing!

In Texas, Florida and New York, George Bush is losing!

And I need to see right now if you still support our president's re-election.

I've already heard a lot of Republicans say they're going to vote for Ross Perot this year.

Among Democrats, Bill Clinton's strength is still growing.

This is an emergency, Mr. Curtis!

That's why your ballot is so important today.

Please tell me today on the enclosed secret ballot who you

38 Ivy Street S.E., Suite A * Washington, D.C. 20003

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plan to vote for in November, and then return it to me in the special reply envelope I've also enclosed. Thank you.

I know this is highly unusual, and I apologize for being so blunt with you today.

But this is a highly unusual election year.

The emergence of Ross Perot threatens to derail President Bush's re-election.

Perot, Clinton and Bush could split enough electoral votes to throw the election into the House of Representatives...

... the DEMOCRAT-CONTROLLED House of Representatives.

That could mean that Bill Clinton could become president, even if he comes in last in the popular vote count.

You and I have not faced an election of this magnitude in our lifetimes.

And today, as Chairman of the Presidential Victory Committee, it's my duty to tell you that our candidate is losing!

I must confide in you...I'm having a crisis of faith.

Republican "experts" in Washington are telling me that people like you don't want President Bush to win this year.

I find that hard to believe.

Even though President Bush has had some rough moments during his presidency, he is still a far better choice than Bill Clinton.

And even though George Bush is not Ronald Reagan, he is still the incumbent Republican President, and you and I have a responsibility to help him.

But when I see the media's polling results, I am unsure about how Americans like you really feel.

And there is no denying it -- Ross Perot is truly a wild card this year.

If Americans begin opening up their checkbooks and start writing checks for millions of dollars to help Bill Clinton, I don't know how I can match that.

Once the Hollywood liberal begin pouring their millions into Bill Clinton's campaign, I don't know how I'll keep up.

I guess I'm asking you to give me something worth more than money, my friend.

I'm asking you to give me some hope. I'm asking you to give

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me some encouragement. I need you to tell me that I must go on fighting. Because frankly, right now, I'm very discouraged.

And the thought of Bill Clinton in the White House -- as the result of a special "deal" with the liberal leaders of Congress -- just makes me sick.

You and I are now less than 30 days away from the beginning of the Democrat National Convention in New York.

You know Bill Clinton's poll ratings will go way up as a result of all the national attention he will get.

Ross Perot should continue to gain supporters.

The one loser in this equation is President Bush.

I can't sit back and do nothing, my friend, while that happens.

I can't defeat the national Democrat political machine by myself.

I need you in my corner fighting for our President's re-election with me.

I need your support to tell our Conservative candidates to Congress that we are committed to their victory.

The country is changing before our very eyes, my friend.

It's not enough to say, "Well, I plan to vote for President Bush, and that's all I'm going to do."

No, in this turmoil-filled year, I need you to commit even more than your vote, as important as that is.

I need you to commit some of your hard-earned resources.

Because, let's face facts, if George Bush had not been in the White House, the liberals would have taken even more of your income than they already have.

Your support for the Presidential Victory Committee is your investment in your own future as well as George Bush's.

And I can guarantee you that your future will be much worse under a President Clinton.

I need your help today.

Please... right now... complete your official PVC Presidential Ballot and return it to me in the specially marked,

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pre-addressed envelope I've enclosed, Mr Curtis.

Next, I need you to put your money where your vote is.

If you're planning to vote for George Bush in November, I need you to help the Presidential Victory Committee today.

The PVC's independent efforts on behalf of the President and other Conservative candidates to Congress cannot succeed without your generous support right now.

And based on your past generosity, I am counting on you for a contribution of \$200 or \$150 today.

Please return your Ballot and \$200 or \$150 in tomorrow's mail.

I am trusting you to help me now. Thank you.

Urgently awaiting your reply,

Floyd G. Brown
Floyd G. Brown
National Chairman

P.S. With both Bill Clinton and Ross Perot in this race, it makes my job that much more difficult.

Your Ballot and maximum \$200 or \$150 donation to the Presidential Victory Committee is crucial.

With the Democrat National Convention set to convene in less than 30 days, I have a lot to do.

I urgently need your \$200 or \$150 contribution to help put everything in motion, Mr. Curtis.

Please return the portion below with your donation payable to:
THE PRESIDENTIAL VICTORY COMMITTEE
Washington, D.C. 20069-1103

From: Mr. Caleb C. Curtis
PO Box 823
Rancho Santa F, CA 92067-0823

Floyd, I have completed and returned my official Presidential Ballot to you. To help you fight for President Bush's re-election, and the election of Conservatives to Congress, I enclose:

\$200 \$150 \$ _____ Other Amount.

Thank you!

=====
For Official Use Only: 92067CRTS823C10 GPVF3A
=====

Paid for by the Presidential Victory Committee and not authorized by any candidate or candidate's committee
Contributions or gifts to the Presidential Victory Committee are not deductible as charitable contributions for federal income tax purposes
The Federal Election Commission requires we ask

Donation

Envelope

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Bobby R. Burchfield
General Counsel
(202) 336-7110

May 15, 1992

BY HAND DELIVERY

Susan E. Propper, Esq.
Assistant General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Dear Ms. Propper:

These comments are submitted by Bush - Quayle '92 Primary Committee, Inc. ("Bush-Quayle 92") in support of the proposed amendments to 11 C.F.R. parts 102 and 110, regarding an unauthorized committee's use of a candidate's name in a special fundraising project on behalf of the unauthorized committee. Bush-Quayle 92 believes that, with one clarification, the proposed amendments will help avoid any confusion about the ultimate beneficiary of the funds raised by such a special fundraising project.

We understand that, during the 1988 Presidential campaign, a number of organizations raised millions of dollars through special fundraising projects named after Presidential candidates without the candidates' authorization. For example, "American Citizens for Political Action" through a fundraising program called "Americans for Dole" raised over \$4 million purportedly to support Senator Robert Dole's Presidential campaign. Similarly, the "Conservative Victory Committee" raised \$386,553 pursuant to a fundraising program called "Americans for Kemp." These programs were not authorized by the candidate for whom they were named, and none of the money raised went to that candidate.

Also in 1988, a group called the "National Security Political Action Committee" raised \$10,277,264 with its "Americans for Bush" fundraising program. The George Bush for President Committee made numerous efforts to prevent the National

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Susan E. Propper, Esq.
May 15, 1992
Page Two

Security Political Action Committee from using the name "Americans for Bush." Despite these efforts, the group continued to raise and spend substantial sums of money. Even now -- four years later -- the President is improperly linked to the "Americans for Bush" group in the popular media.

During the present Presidential election a group called the "Presidential Victory Committee" had, by the end of March, raised \$251,626.16 through its fundraising project designated "Citizens for Bush." This group's activity has not been authorized by the President or Bush-Quayle 92. In fact, on behalf of the President and Bush-Quayle 92, I have specifically demanded that the group "immediately cease any and all activities undertaken in the name of 'Citizens for Bush,' 'Presidential Victory Committee,' or any similar designation that raises the possibility of confusing [their] efforts with those of Bush-Quayle 92."

We recognize and respect the strong First Amendment rights of independent groups to raise and spend money on behalf of the candidates of their choice. Our concern is that these projects have the potential to mislead contributors into believing that the money raised will go directly to the candidate for whom they are named. Persons viewing advertisements by these groups may be similarly confused. If this confusion can be avoided without abridgment of the First Amendment, Bush-Quayle 92 would support the regulations.

Another issue raised by the proposed regulations, as well as by the suggestion in the Federal Register Notice that independent expenditure groups should be prohibited from using a candidate's name in a special fundraising project without the candidate's permission, is whether a candidate will be deemed to have authorized the independent committee by allowing it to use his or her name. Unless the FEC makes clear that candidate consent to the use of the candidate's name by an unauthorized committee does not result in authorization of the Committee, Bush-Quayle 92 would oppose such a rule.

We thank you for the opportunity to comment on these matters.

Sincerely,


Bobby R. Burchfield

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Exhibit L _____

GEORGE W. BUSH

Mr. Richard D. Holcomb
505 E. Braddock Road, No. 508
Alexandria, VA 22314-2164

Dear Mr. Holcomb,

In recognition of the special role you play in my father's campaign, a very special proclamation in your name has been reserved. I hope you will treasure it for years to come.

But before I say more about this award I want to make sure that you understand and fully appreciate the message which the liberal Democrats just sent to you and me and my father.

Let me explain. The Democrats who control Congress rejected the economic recovery plan Dad put forth in his State of the Union Address and passed instead a major tax increase.

As the President said when he vetoed their outrageous tax plan, "they aren't blocking my economic recovery plan because they're afraid it won't work... they're blocking it because they're afraid it will work."

This Congress which cannot manage or police itself has become bitterly partisan -- more partisan than at anytime in my memory.

Their one overriding concern is to further their own political fortune regardless of the cost to our nation or anyone else. For them it is Party first, America second.

And their message to you and me is very plain: they are going to do everything in their power to make this the most bitter, "no-holds-barred" partisan battle all the way to Election Day.

Their effort to sabotage America's economic recovery in the hope it would win them votes was only the beginning. I hope you have taken the time to listen carefully to Bill Clinton and the other Democrat leaders and seriously consider the damage they would do to America if they win this election.

The stakes in this election are far too high for any of us on the President's team to take anything for granted. That is why I am coming to you today with a special request.

Mr. Holcomb, will you help us protect and ensure the effectiveness of the President's most important campaign programs?

Since he vetoed the Democratic Congress' tax increase bill on March 20th, the President has put forward a very bold package of domestic reforms: in trade and competitiveness; controlling spending, reforming

education, limiting the runaway costs of litigation, restructuring welfare and improving access to our health care system.

These reforms will make America a better place. But the prospect of change makes our entrenched opponents fearful. That is why it's so important for you to support the President now during these challenging times

Under Federal Election Law we are permitted to open a separate account and pay for the cost of complying with the FEC laws out of that account. This special account is free from some of the limits and requirements of the main campaign account.

If, however, we fail to raise the necessary funds to pay for the FEC compliance out of this separate fund we must use campaign dollars.

If at any point we are forced to withdraw vitally needed funds out of the campaign, it could be catastrophic. It would mean that our efforts to win this election could be seriously crippled.

It is imperative that we protect the President's campaign from the threat of having to make unnecessary withdrawals to pay for FEC compliance.

That is why as this campaign heats up and every dollar in our main campaign account takes on added importance, I want to ask you to join a very special group of the President's dedicated supporters who are helping to raise the full amount we need in this Compliance Fund.

Your support of the Compliance Fund will mean that we will be able to chart and execute our long-term campaign against the Democrats without interruption.

Your contribution now to the Compliance Fund will protect the effectiveness of your previous support of the campaign.

This contribution to protect the President's campaign will very likely be the most important contribution you can make between now and Election Day.

I am keenly aware of how generously you have supported the President's primary campaign and I know how grateful he is for your support. In fact the record indicates that you have contributed a total of \$250.

We must be able to raise the full amount of the Compliance Fund so that we can ensure that the President will be able to wage a full, uninterrupted campaign to defeat Bill Clinton or whomever the Democrats decide to nominate. Because the Compliance Fund is so very important, I would hope you could contribute a total of \$250.

I would not make this special request of you on behalf of the President unless it was absolutely necessary.

In fact, we attach such enormous importance to your contribution now to the Compliance Fund that we will present to you a special Presidential award if you will match the support you have given the campaign account with a contribution to the Compliance Fund of \$250.

23040935134

If you join me in matching your past support with an equal contribution to the Fund, you will receive a unique, numbered Proclamation of Appreciation.

All who see it will immediately recognize the special relationship you have with the President and that you played a vital role in the President's re-election campaign.

I cannot overemphasize the importance of your contribution today to the Compliance Fund. Please take a moment now to review your reply form and check how your name will appear on your Proclamation. If any corrections need to be made please make them directly on this form. I want to insure that your award is correct.

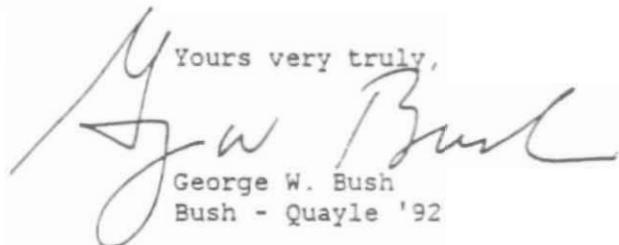
Your support of this campaign right now is important, as we are now engaged in a great battle with the Democrats.

It will decide whether we must endure more of the Democrats' vision for the future, which consists of little more than one scheme after another to raid the Treasury and buy votes from the special interests, or whether we will adopt George Bush's vision of growth and reform.

For the sake of our own and future generations of Americans, we must win this battle and pare back the government waste, asking government to do for us only that which we cannot do as individuals.

Your contribution to the Compliance Fund is important. Even if you are not able to match your past support I hope you will make every effort to send a contribution today.

This campaign is far from over and the greatest danger we face is if Republicans underestimate the challenge we face. The best way you can help with this critical election is by sending your contribution to the Compliance Fund.

Yours very truly,

George W. Bush
Bush - Quayle '92

P.S. It is important to understand that in this campaign we are fighting not only the Democrats but the hundreds of liberal special interest groups who have no higher goal than to re-take the White House and open the spigots of public spending into their own private interests.

The stakes in this election are high. Our nation and each American faces an unparalleled threat if the Democrats win this election.

They must be stopped and to insure their defeat each of us must redouble our effort. The single best way you can ensure victory is by sending a special contribution to the Bush - Quayle '92 Compliance Committee.

23740935135



Reply to George W. Bush

Dear George:

() I understand the vital importance of raising the urgently needed funds for the Compliance Fund.

It is imperative that we protect the Bush re-election campaign from the threat of having to make unnecessary withdrawals to pay for FEC compliance. Too much is at stake in this election and that is why I am sending a special contribution in the amount indicated below:

() \$250 - I am matching my past support and I look forward to receiving my very special Proclamation of Appreciation.

() \$_____ other

Mr. Richard D. Holcomb
505 E. Braddock Road, No. 508
Alexandria, VA 22314-2164

188073 U600

Please make check payable to: Bush - Quayle '92 Compliance Committee.

I have made any corrections below in how I would like my name to appear on my Proclamation of Appreciation:

Mr. Richard D. Holcomb

A Special Notice from George W. Bush

Dear Mr. Holcomb:

Many of my father's best supporters are receiving solicitations from an organization by the name of Citizens for Bush. This group and its chairman Floyd Brown have absolutely nothing to do with the President's official campaign and we do not in any way support their efforts. In fact, this group, Citizens for Bush, may actually damage the President's re-election efforts.

I want to strongly encourage you not to contribute or support the Citizens for Bush organization. The single best way you can help President Bush is by contributing to the Compliance Fund.

George W. Bush

Paid for by Bush - Quayle '92 Compliance Committee, Inc. Contributions are not deductible as charitable contributions for Federal income tax purposes.

23040935176

23040935137

Dear Bush - Quayle '92 Supporter:

The Federal Election Commission requires us to ask the following information:

Your Employer: _____ Occupation: _____

BUSINESS REPLY MAIL

FIRST CLASS PERMIT NO. 18529 WASHINGTON, D.C.

POSTAGE WILL BE PAID BY ADDRESSEE

George W. Bush

Bush - Quayle '92 Compliance Committee, Inc.

P.O. Box 19992

Washington DC 20077-5900



NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES



8 2 1 5

23040935189



Bobby R. Burchfield
General Counsel
(202) 336-7110

May 14, 1992

Mr. Daniel R. Stough
1905 Bedford Road
Oklahoma City, Oklahoma 73116

Dear Mr. Stough:

From Federal Election Commission records, it appears that you have contributed to a project called "Citizens for Bush." This project, organized and operated by the "Presidential Victory Committee," is neither authorized nor affiliated with the President's re-election campaign. The only two committees affiliated with the President's campaign are Bush-Quayle '92 Primary Committee, Inc. and Bush-Quayle '92 Compliance Committee, Inc.

On March 9, 1992, I wrote to Mr. Brown on behalf of President Bush and Bush-Quayle '92 demanding that he immediately cease any and all activities undertaken in the President's name. A copy of that letter is attached.

If you contributed to "Citizens for Bush" or the "Presidential Victory Committee" under the false impression that those groups are affiliated or authorized by President Bush, you may write to that Committee to request a refund. Should you desire to do so, the address is:

Mr. Floyd Brown
Presidential Victory Committee
38 Ivy Street, S.E.
Suite A
Washington, D.C. 20003

In any event, we at Bush-Quayle '92 very much appreciate your continued support of President Bush.

Sincerely,


Bobby R. Burchfield

Attachment

93040935140

23040935141

JOHN W. THATCHER
3030 N. E. SECOND AVENUE
POST OFFICE BOX 87118
MIAMI, FLORIDA 33187

July 9, 1992

Mr. Floyd Brown
Presidential Victory Committee
38 Ivy Street, S.E.
Suite A
Washington, DC 20003

Dear Mr. Brown:

I have received a letter today from Mr. Bobby R. Burchfield, General Counsel to the Bush-Quayle '92 Primary committee, Inc. advising me that you and your organization is neither authorized or affiliated with the Presidents' re-election campaign.

I have made contributions to your organization under the false impression that you and your groups were affiliated or authorized by President Bush to solicit funds on his behalf.

The gifts I have made under this false impression is listed below:

<u>Date</u>	<u>Payee</u>	<u>Amount</u>
9 May '92	"Presidential Victory Committee"	\$500.00

Because of the circumstances involved in making this contribution, I am requesting that these funds be returned to me immediately so that they may be redirected to an organization authorized by President Bush.

Your prompt compliance with this will be appreciated.

Yours truly,


John W. Thatcher

JWT/ng

cc: Bobby R. Burchfield

23040935142



Bobby R. Burchfield
General Counsel
(202) 336-7110

June 29, 1992

~~Ms.~~ Kari Sletten
RR 1 Box 12
Souris, ND 58783-~~9713~~

Dear Ms. Sletten:

From Federal Election Commission records, it appears that you have contributed to a project called "Citizens for Bush." This project, organized and operated by the "Presidential Victory Committee," is neither authorized nor affiliated with the President's re-election campaign. The only two committees affiliated with the President's campaign are Bush-Quayle 92 Primary Committee, Inc. and Bush-Quayle 92 Compliance Committee, Inc.

On March 9, 1992, I wrote to Mr. Brown on behalf of President Bush and Bush-Quayle 92 demanding that he immediately cease any and all activities undertaken in the President's name. A copy of that letter is attached.

If you contributed to "Citizens for Bush" or the "Presidential Victory Committee" under the false impression that those groups are affiliated or authorized by President Bush, you may write to that Committee to request a refund. Should you desire to do so, the address is:

Mr. Floyd Brown
Presidential Victory Committee
38 Ivy Street, S.E.
Suite A
Washington, D.C. 20003

In any event, we at Bush-Quayle 92 very much appreciate your continued support of President Bush.

Sincerely,

Bobby R. Burchfield

Attachment

I sure will continue support of

1030 15th St. NW, Washington, DC 20005
Paid for by Bush-Quayle '92 Primary Committee, Inc.
Printed on Recycled Paper

Kari Sletten

*President Bush
all I can. I am a
Farm Widow 83 yrs. old*

93049935143

Caleb C. Curtis
Post Office Box 823
Rancho Santa Fe, California 92067

June 18th, 1992

Bobby R. Burchfield, Esq.
1030 a5th Street, NW
Washinton, D. D. 200005

Dear Mr. Burchfield:

Your letter of June 12th relative to that patriotic citizen, Floyd Brown, was greatly appreciated. I had made two contribtuions, each in the amount of \$100 to the so-called Presidential Victory Committee under the distinct impression that this was a group duly authorized by President Bush. My letter has gone forward to Brown under certified mail enclosing photocopies of these checks and demanding an immediate refund. When this comes in I SHALL be happy to send the \$200 along to BUSH QUALE 92.

Brown has done untold damage to your campaign. He has flooded my letter box with requests to the point where I had about decided that if those acting for President Bush were so poorly organized I had better shift my vote to Perot.

Most sincerely,

Caleb C. Curtis

93040935144

HAROLD I. PRATT
50 CONGRESS STREET
BOSTON, MASS. 02109

June 3, 1992

Mr. Floyd Brown
Presidential Victory Committee
38 Ivy Street, S.E., Suite A
Washington, DC 20003

Dear Mr. Brown:

By means of check numbered 5630, dated March 14, 1992, I made a contribution of \$500, to "Citizens for Bush".

In accordance with the enclosed letter from Bobby R. Burchfield, General Counsel of Bush-Quayle Primary Committee, Inc., I ask that you return my contribution to me, as I was under the mistaken impression that I was making contribution to a committee authorized by the President.

I look forward to receiving reimbursement in the near future. Thanks in advance for your help.

Sincerely,

Harold I. Pratt

Harold I. Pratt

HIP:cc

Enclosures

✓cc: Bobby R. Burchfield, General Counsel
Bush-Quayle 92 Primary Committee
1030 15th Street, N.W.
Washington, DC 20005

23040935145

Jan 24, 1992

Mr. Floyd Brown;

On April 27, 1992 I sent you
a check in the amount of \$300.00
under the false impression that
you were affiliated or authorized
by President Bush. Please send
me a refund upon receipt of
this communication

Sincerely,

Elizabeth A. Boland
1930 Menomonee River Parkway
Wauwatosa, WI 53226

copy: Dody R. Birchfield

23040935146

June 23, 1992

Floyd Brown
38 Ivy St., SE
Washington, DC 20003

Dear Mr. Brown:

I have a copy of a letter written to you by Bobby R. Burchfield on March 9, 1992, regarding soliciting of funds under the names of "Presidential Victory Committee" and "Citizens for Bush".

I am very upset that I was misled and that my donation of April 23, 1992 in the amount of \$300.00 was to an unauthorized entity. I demand that my \$300.00 be returned to me at once. My donation was received by you 44 days after the letter you received from Mr. Burchfield. Furthermore, I have received at least 15 additional requests (2 today) from you, all in the name of "Citizens for Bush", a project of "Presidential Victory Committee".

Enclosed find copy of my check of April 23, 1992.

Also enclosed is a copy of Mr. Burchfield's letter to you dated March 9, 1992.

Sincerely,

By



Donald G. Geary
P. O. Drawer D
Centralia, IL 62801

DGG/man

Enclosures

cc: Mr. Bobby R. Burchfield

23040935147

VINCENT L. GREGORY, JR.
ROHM AND HAAS BUILDING
PHILADELPHIA, PA
19103

REGISTERED

June 10th, 1992

Mr. Floyd Brown
"Presidential Victory Committee"
38 Ivy Street, S.E.
Suite A
Washington, D.C. 20003

cc: Bobby R. Burchfield, Esq.
Anthony L. Bartolini, Esq. -
Dechert Price & Rhoads

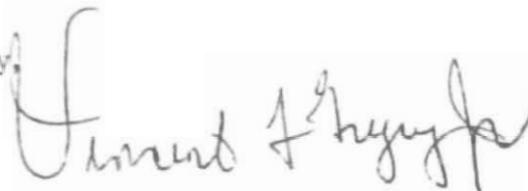
Dear Mr. Brown,

Would you kindly return the \$1,000 payment I made to you on March 17th, 1992, under Fidelity Bank cheque # 8252. This payment was made based on the understanding from various telephone calls of members of your organization and of several letters from the "Presidential Victory Committee" that you were an official committee authorized to collect funds on behalf of the Bush/Quayle Re-election Campaign.

The donation that you received from me was obtained under false pretences. The "disclaimer" at the end of your letter is very misleading and does not make clear that you are not authorized to solicit funds on behalf of the Bush/Quayle Campaign. The total effect of the letters you sent me and the telephone calls is that you are an authorized agent and that the funds would be used for the re-election of President Bush and Vice President Quayle.

I have been advised by Bobby R. Burchfield, Esq., General Counsel for the Bush/Quayle 1992 Campaign, that you and your associates in the "Presidential Victory Committee" and in "Citizens for Bush" are in no way authorized to collect funds for the President's re-election campaign. Thus you obtained funds from me under false pretences and I request that you refund the \$1,000 amount that I sent you. My attorneys have advised that I write to you making this request before other action is initiated.

Yours truly,



Blind note to Messrs. Burchfield and Bartolini

Mr. Brown has ignored Mr. Burchfield's letter of March 9th, 1992, asking him to cease all activities undertaken in the name of "Citizens for Bush" and "Presidential Victory Campaign". During the past week I have received another round of letters from Mr. Brown, soliciting funds on behalf of the "Presidential Victory Committee". I am attaching copies of some of this correspondence dated May 29th, 1992 and June 5th, 1992, to Mr. Burchfield's copy of this letter.

23040935148

R. Gwin Follis
555 Market Street
Suite 1824
San Francisco, CA 94105-2870

May 26, 1992

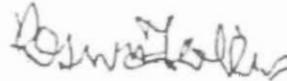
Mr. Floyd Brown
Presidential Victory Committee
38 Ivy Street S.E.
Suite A
Washington, DC 20003

Dear Mr. Brown:

We have been advised that the Presidential Victory Committee is neither authorized nor affiliated with the President's re-election campaign. Therefore, please refund the \$5,000 I sent to the Presidential Victory Committee on March, 10, 1992.

Send the refund to me at the above address.

Sincerely,



cc: ✓ Mr. Bobby R. Burchfield, General Counsel

93040935149



2600 Grand Avenue, Suite 301
Des Moines, Iowa 50312
515-246-1750
(Fax) 515-246-8210

May 27, 1992

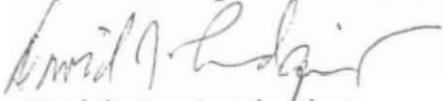
Mr. Floyd Brown
Presidential Victory Committee
38 Ivy Street, S.E., Suite A
Washington, D.C. 20003

Dear Mr. Brown:

It has come to my attention that your organization is neither authorized nor affiliated with the Bush-Quayle re-election committee. Unfortunately, I did not notice the disclaimer that must have been in your first letter to me in February, 1992. I subsequently sent a \$250 contribution to your organization, thinking that it was officially authorized by or affiliated with the Bush-Quayle committees. I had absolutely intended to give my contribution to the official Bush-Quayle campaigns and am unhappy that you would send out literature that many such as myself feel is very misleading. I demand that you send me a refund so that I might contribute to the organizations that I had originally intended to.

Sincerely,

New Heritage Associates


David J. Lundquist
Vice Chairman

DJL/sls

cc: Bobby B. Burchfield, General Counsel
Bush-Quayle Committee
1030 15th St., N.W.
Washington, D.C. 20005

23040935130

DANIEL R. STOUGH, M.D.

NEUROSURGERY ASSOCIATES

CHARLES F. ENGLER, M.D.
BRENT N. HISEY, M.D.
LONNIE J. LAMPRICH, M.D.
WILLIAM EMERY REYNOLDS, M.D.
RICHARD V. SMITH, M.D.
DANIEL R. STOUGH, M.D.
HARRY B. TATE, M.D.

A PROFESSIONAL CORPORATION
BAPTIST MEDICAL PLAZA NORTH
3433 N.W. 56th, SUITE 610
OKLAHOMA CITY, OKLAHOMA 73112
405-945-4720

PRACTICE LIMITED TO
NEUROLOGICAL SURGERY

May 19, 1992

Mr. Floyd Brown
Presidential Victory Committee
38 Ivy Street, S.E., Suite A
Washington, D.C. 20003

Dear Mr. Brown:

I have recently received information from Bobby R. Burchfield who is General Counsel for the Bush-Quayle 92 Campaign. Mr. Burchfield informs me that you are unauthorized to solicit funds on behalf of President Bush. He informs me that the "Presidential Victory Committee" is neither authorized nor affiliated with the President's re-election campaign.

By this letter, I am requesting that you refund, immediately, the amount of \$250.00 written on Check #795, dated 3/16/92 and mailed to the "Presidential Victory Committee". I would appreciate an immediate response to this request.

Sincerely,


Daniel R. Stough, M.D.

DRS/de

cc: Bobby R. Burchfield
Bush-Quayle 92
1030 15th Street, N.W.
Washington, D.C. 20005

23940935151

Bernard Fein
80 Garden Road
Scarsdale, NY 10583

June 18, 1992

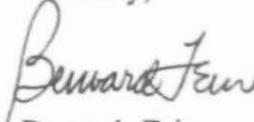
Bobby R. Burchfield,
General Counsel,
Bush-Quayle 92
1030 15th Street, N.W.
Washington, DC 20005

Dear Mr. Burchfield:

The enclosed letter by me to Mr. Floyd Brown was sent after I received your letter of June 12th calling my attention to his shocking behavior.

I will keep you informed of any reply.

Cordially,


Bernard Fein

P.S. I may be reached weekdays, other than Friday at my New York office (212) 752-8787.

23040935152

23740935153



March 26, 1992

Mrs. Jo Anne Evans
Route 1, Box 104, Ross Acres
Centralia, Illinois 62801

Dear Mrs. Evans:

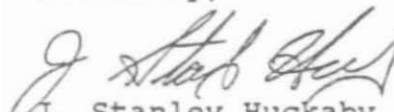
I am returning your contribution of \$50.00 which was delivered to our campaign headquarters in Illinois. While your desire to contribute to the President's re-election is greatly appreciated, you should know that "Citizens for Bush: A Project of Presidential Victory Committee" is not affiliated with the President's re-election effort and in fact is not authorized to use the President's name to solicit money.

I apologize for the misleading impression this group has given to you that your contribution would be used for the President's re-election. Should you desire to support the President's re-election, you should reissue your check and make it payable to "Bush - Quayle '92 Primary Committee, Inc.", the President's principal campaign committee and the only committee authorized to receive contributions and make expenditures on behalf of the President. I have enclosed for your convenience a response card and a return envelope.

Again, I thank you for your support of the President.

With kindest regards.

Sincerely,


J. Stanley Huckaby
Treasurer

JSH:rdh

Enclosures

23040935155

FRANK D. EVANS OR
JO ANNE EVANS

4021

3-16 19 92 70-41/819

PAY TO THE
ORDER OF

Citizens F/Bush

\$ *50.00*

Fifty

00/100

DOLLARS



Old National Bank
of Centralia
Centralia, Illinois 62801

THE
HERITAGE
CLUB 55

MEMO

Jo Anne Evans

10/1/92



March 26, 1992

Mrs. Allen E. Gant
1021 Edgewood Avenue
Burlington, North Carolina 27215

Dear Mrs. Gant:

I am returning your contribution of \$100.00 which you mailed to our National Campaign Headquarters in Washington, D.C.. While your desire to contribute to the President's re-election is greatly appreciated, you should know that "Citizens for Bush: A Project of Presidential Victory Committee" is not affiliated with the President's re-election effort and in fact is not authorized to use the President's name to solicit money.

I apologize for the misleading impression this group has given to you that your contribution would be used for the President's re-election. Should you desire to support the President's re-election, you should reissue your check and make it payable to "Bush - Quayle '92 Primary Committee, Inc.", the President's principal campaign committee and the only committee authorized to receive contributions and make expenditures on behalf of the President. I have enclosed for your convenience a response card and a return envelope.

Again, I thank you for your support of the President.

With kindest regards.

Sincerely,



J. Stanley Huckaby
Treasurer

JSH:rdh

Enclosures

3 9 4 9 9 3 5 1 0 6

23040935157

MRS. ALLEN E. GANT
1021 EDGEWOOD AVE
BURLINGTON, NC 27215

7780
98-49/531

Mar. 6 1922

PAY TO THE ORDER OF Citizen for Bush \$ 100.00

One hundred dollars and no 100 DOLLARS

Wachovia
Wachovia Bank & Trust Company, N.A.
Burlington, NC 27215

FOR _____ Mrs. Allen E. Gant

**STATE VOTER'S
BALLOT**

As a citizen of the United States of America and a registered voter in the state/commonwealth of _____ I do hereby cast my vote for President of the United States for:

<input checked="" type="checkbox"/> George Bush	<input type="checkbox"/> Bill Clinton
<input type="checkbox"/> Pat Buchanan	<input type="checkbox"/> Paul Tsongas
<input type="checkbox"/> David Duke	<input type="checkbox"/> Tom Harkin
	<input type="checkbox"/> Bob Kerrey
	<input type="checkbox"/> Jerry Brown

this is NOT an official ballot

BUSH 92 QUAYLE
★ ★ ★ ★ ★ ★ ★ ★ ★ ★ ★ ★ ★ ★ ★ ★

Stan Huckaby, Treasurer

April 10, 1992

Mr. Robert M. Bessmer
33508 E. Old Lexington Road
Buckner, MO 64016

Dear Mr. Bessmer:

I am returning the contribution of \$25.00 which you mailed to our National Campaign Headquarters in Washington, D.C. While your desire to contribute to the President's re-election is greatly appreciated, you should know that "Citizens for Bush: A Project of Presidential Victory Committee" is not affiliated with the President's re-election effort and, in fact, is not authorized to use the President's name to solicit money.

I apologize for the misleading impression this group has given to you that your contribution would be used for the President's re-election. Should you desire to support the President's re-election, you should reissue your check and make it payable to "Bush - Quayle '92 - Primary Committee, Inc.," the President's principal campaign committee and the only committee authorized to receive contributions and make expenditures on behalf of the President. For your convenience, I have enclosed a response card and a postage-paid return envelope.

Again, I thank you for your support of President Bush and Vice President Quayle.

Sincerely,

Stan Huckaby
J. Stanley Huckaby
Treasurer

Enclosures

33949935158

CITIZENS FOR BUSH
 A PROJECT OF
PRESIDENTIAL VICTORY COMMITTEE

SPECIAL REPLY TO CHAIRMAN FLOYD BROWN

Dear Chairman Brown,

I want to stop the liberals as much as you do. To help you and Citizens for Bush get the truth out about their disastrous designs for America, I enclose:

\$25 () \$50 () \$100

() \$250 () \$500 () \$1,000 () \$_____

IMPORTANT: Please return this page with your check payable to:

THE PRESIDENTIAL VICTORY COMMITTEE
 Washington, D.C. 20070-1103

Please print your name and address below and return this page with your check.

Name _____

Address _____

 **ROBERT M BESSMER**
 33508 E OLD LEXINGTON
 SUCKNER, MO 64016

City/State/Zip _____

Telephone (RL6) 249-3144

If you intend to win this election you need to take a firm stand on reducing air pollution - reducing the national debt and a medical plan like social security where both employee & Employer pay except no limitation higher incomes. I believe most higher income people are willing to pay more. Maybe its socialized medicine - after all the Washington people are on it

Citizens for Bush is a project of and has been paid for by the Presidential Victory Committee and is not authorized by any candidate or candidate's committee. Contributions to Citizens for Bush are not deductible as charitable contributions for federal income tax purposes. The Federal Election Commission requires that we ask:

Occupation: Retired Employer: _____

23740935149

ROBERT M. OR FLORENCE K. BESSMER
33508 E. OLD LEXINGTON ROAD
BUCKNER, MO 64016

1428

80-1132/1019

PAY TO THE
ORDER OF

President and Victoria Bessmer \$ 25.00

ROBERT M. OR FLORENCE K. BESSMER

DOLLARS



Robert M. Bessmer

FOR _____

0 3 1 5 2 6 0 7 4 0 3 6

BUSH '92 QUAYLE
★ ★ ★ ★ ★ ★ ★ ★ ★ ★ ★ ★ ★ ★ ★ ★

Stan Huckaby, Treasurer

April 22, 1992

Mr. Joseph A. Episcopo
9832 S. 51st Avenue
Oak Lawn, IL 60453

Dear Mr. Episcopo:

I am returning the contribution of \$1000.00 which you gave to attend the Bush-Quayle '92 Presidential fundraising event in Chicago, IL. This check was mistakenly issued to "Citizens for Bush Quayle '92" and we are unable to deposit a check which is not issued directly to "Bush-Quayle '92". While your desire to contribute to the President's re-election is greatly appreciated, you should know that "Citizens for Bush: A Project of Presidential Victory Committee" is not affiliated with the President's re-election effort and, in fact, is not authorized to use the President's name to solicit money.

Because you did attend the authorized event, we ask that you confirm your support of the President's re-election and reissue your check made payable to "Bush - Quayle '92 - Primary Committee, Inc.," the President's principal campaign committee and the only committee authorized to receive contributions and make expenditures on behalf of the President. For your convenience, I have enclosed a response card and a postage-paid return envelope.

Again, I thank you for your support of President Bush and Vice President Quayle.

Sincerely,

Stan Huckaby

J. Stanley Huckaby
Treasurer

Enclosures

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 JOSEPH A. EPISCOPO 1-81
 SANDRA L. EPISCOPO
 9832 S. 51ST AVE.
 OAK LAWN, ILL. 60453

The order of CITIZENS FOR BUSH QUAYLE '92

ONE THOUSAND AND NO/100 \$ 1000

Oak Lawn National Bank | EVERGREEN BANKS
 OAK LAWN, ILLINOIS 60453

MARCH 16th 1992

490
 70-2327

Joseph A. Episcopo

ZARANSKY

BUSH 92 QUAYLE

★ ★ ★ ★ ★ ★ ★ ★ ★ ★ ★ ★ ★ ★ ★ ★

I/We will be able to attend the dinner with President and Mrs. Bush. Enclosed is my/our contribution of \$1,000 (\$2,000 per couple), in support of the Bush - Quayle '92 campaign.

I/We are unable to attend, however, I/we support the President's re-election campaign and have enclosed a contribution of \$ _____

I/We have already sent my/our maximum contribution of \$1,000 to the Bush - Quayle '92 campaign; however, I/we would like to help the President's campaign further by contributing to the Bush - Quayle '92 Compliance Fund. Enclosed is my/our personal check for _____ (\$1,000 limit per person).

Name Vito and Joseph Episcopo Phone: _____

Home Address Midway Airport CONCESSIONAIRES

Business Address 5800 S. CICERO AVE

- REMEMBER:
1. Please make all checks payable to Bush - Quayle '92.
 2. Checks drawn on account maintained by an incorporated entity are prohibited by law.
 3. Contributions to the Bush - Quayle '92 - Primary Committee are limited to \$1,000 per person.
 4. For more information, please call Patricia Hurley & Associates (312) 553-2000.
- (Please see reverse side for important information that may double your contribution at no cost to you.)

CHI

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Checks and Balances

After reading "Caught in the Act" (NATIONAL AFFAIRS, March 23), I can only conclude that our legislators are a self-consecrated elite pursuing a government of, by and for themselves. They wallow in extravagant perks, blatantly abuse their privilege and raid the national treasury to reward themselves with lavish salary increases and expensive junkets. How can taxpayers trust a House full of people who duck lunch chits and kite checks to understand, let alone honestly manage, the affairs of government—particularly the federal budget? An outraged electorate must take back its government by voting against incumbents and demanding term limits.

WILLIAM C. ROSELLE
Thiensville, Wis.

• • •

Maybe the House bank was run poorly. Still, that is no valid excuse for the overdrafts some of our representatives have incurred. The fact that some have amassed overdrafts exceeding their paychecks over the course of months—or years—is unconscionable. The other excuses the offenders offer are equally laughable: "the wife," poor bookkeeping, the distraction of a crying baby. Come on! It doesn't take a rocket scientist to balance a checkbook.

TERRY KROLIK
Las Vegas, Nev.

• • •

Many Americans are homeless. Millions of our citizens are out of work and some of them are not even able to properly feed themselves and their families. They as well as the rest of us who are still suffering from the recession are rightfully incensed at the shoddy financial practices of these representatives who have been routinely bouncing checks.

Lt. Col. RICHARD H. BECK, USAF (Ret.)
San Clemente, Calif.

• • •

Let's be fair: the House bank was no bank at all, just a credit union and check-cashing service. It paid no interest on deposits and made no loans to earn interest. It was a place where members of the House pooled their money and cashed checks. When they overdrew their accounts, they were essentially borrowing from each other. No taxpayers' money was involved in covering the overdrafts. But the uproar about it is something else. It smacks of an effort by Republicans to destroy the Democratic majority in Congress.

RUTH KASWAN
Berkeley, Calif.

☎ Denotes letters received via telephone mail, 1-900-990-MAIL.

MAIL CALL

Reps in the Red

The arrogance and stupidity of our elected servants is beyond belief," wrote a typical reader in response to our March 23 cover story on the House bank scandal. The debacle, offered another, "reinforces the message that Congress plays by different rules and has little grasp of the real world." Nor did the excuses offered by overdrawn legislators elicit much sympathy. "I've had no food in the house," countered an irate reader, "and I still didn't bounce a check." Even the untainted drew fire: "Representatives who smugly proclaim their innocence conveniently forget the billions in bad checks they have drawn on the accounts of our children." Still, a few considered the affair less a Teapot Dome than "a tempest in a teapot."



☎ To focus on the issue of check bouncing and identifying the check bouncers diverts attention from the real source of culpability—Congress's allowing the bank to be run so irresponsibly in the first place.

LEE SAUNDERS
Winter Park, Fla.

• • •

Listening to my congressional representatives explain how their check kiting did not cost the taxpayers any money gave me an idea. Congress can set up a nationwide chain of banks run on the same principle and appropriate funds for all bank employees, equipment, taxes and rents. Such banks could give interest-free loans to all of us. The best part is that it shouldn't cost the taxpayers any money.

MICHAEL M. GOLDEN
San Francisco, Calif.

• • •

Considering the magnitude of the crises presently facing both the United States and the world, it seems bizarre that the voters' ire is aroused so passionately by the congressional banking "scandal." It's tragic that voters don't show equal indignation regarding their government's largely ineffective policies concerning war and peace, poverty, AIDS and environmental protection.

DAVID WEISSMAN
San Francisco, Calif.

No Nod From Bush

Your suggestion ("Here We Go Again," PERSPECTIVE, March 30) that "Bush campaign officials are said to be privately delighted" about the formation of the so-called Presidential Victory Committee by Floyd Brown is absolutely false. Neither the president nor his re-election campaign approves of Mr. Brown's activities. On behalf of the president and Bush-Quayle '92, I wrote to Mr. Brown on March 9, 1992 demanding that he and his group stop soliciting funds or conducting other activities in the name of "Citizens for Bush" or any other designation that implied affiliation with the president or his re-election campaign. If the group continues these activities, Bush-Quayle '92 intends to take further measures.

BOBBY R. BURCHFIELD, General Counsel
Bush-Quayle '92
Washington, D.C.

Regulating Property

Permit me to clarify a point in regard to "Pay Me, or Get Off My Land" (SOCIETY, March 9), which highlighted the case of David Lucas, who is suing for compensation after a state environmental law was passed barring him from building a house on his beachfront lot. The story cited me as one who "argues that property rights can be limited only for a price." Actually, my position is more moderate than that suggests. I'm on middle ground between the property-rights folks and environmentalists. In my view, the government need not compensate a landowner when its law prevents the occurrence of a nuisance or other wrong. The environmentalists' alarm that my position spells the end of government regulation of pollution is a scare tactic.

RICHARD A. EPSTEIN, Professor of Law
University of Chicago
Chicago, Ill.

Rogue Police?

Granted, tough "badguys" require tough "good guys," but a police officer is not necessarily always a "good guy" ("LAPD: A Force Unto Itself," NATIONAL AFFAIRS, March 16). A policeman is just like you and me: a human being with strengths and weaknesses. Wearing a uniform does not automatically justify committing violence, and police officers are not above the law.

STEVE ANDERSON
Philadelphia, Pa.

• • •

The fact that, as you report, 3.0 people were killed and 8.1 wounded for every 1,000 Los Angeles Police Department officers in 1986 seems to me a very commendable statistic, considering that the officers daily

Exhibit Q

23040935165



Bobby R. Burchfield
General Counsel
(202) 336-7110

March 31, 1992

BY FACSIMILE

Mr. Laurence A. Tisch
Chairman and Chief
Executive Officer
CBS
51 West 52nd Street
New York, New York 10019

BY FACSIMILE

Ms. Barbara Cohen
Vice President of CBS News
and Washington Bureau Chief
CBS
2020 M Street, N.W.
Washington, D.C. 20036

Dear Mr. Tisch and Ms. Cohen:

On behalf of Bush-Quayle '92 and President Bush, I am writing to call your attention to the inaccuracies and misleading implications in a story that aired March 30, 1992, on the CBS Evening News with Dan Rather, and again on the CBS Morning News on March 31, 1992. The news segment involved a group formed by Mr. Floyd Brown called "Presidential Victory Committee." Mr. Brown's group has been soliciting funds using the name "Citizens for Bush."

Mr. Rather's introduction of the story -- "Bill Plante is at the White House" -- was seriously misleading. The opening of the segment showed footage from an advertisement sponsored by Mr. Brown's group in 1988, followed immediately by footage from Mr. Brown's press conference. This sequence incorrectly implied that Mr. Brown is conducting his operation out of the White House.

Moreover, Mr. Plante stated "one man who worked on the Horton ad [in 1988] was working at the same time for the Bush campaign." This statement is false. Indeed, the Federal Election Commission voted 6 to 0 last December to dismiss a complaint based on that very allegation.

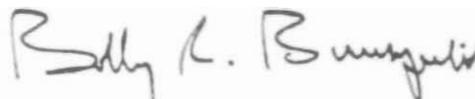
Finally, all the other networks -- NBC, ABC, CNN, and Fox -- correctly noted that on March 9, 1992 I wrote to Mr. Brown on the President's behalf demanding that he "immediately cease

Mr. Laurence A. Tisch
Ms. Barbara Cohen
March 31, 1992
Page Two

any and all activities" undertaken in the President's name. My office faxed this same letter to Mr. Mark Noler at CBS yesterday afternoon. I am quite disappointed that CBS failed to refer to this letter in its report.

We firmly believe that this information warrants the prompt airing of a correction. We hope that in the future CBS will more carefully distinguish the activities of Bush-Quayle 92 from those of independent, unaffiliated groups.

Sincerely,



Bobby R. Burchfield

cc: Mr. Dan Rather
Mr. Bill Plante

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Exhibit R



Bobby R. Burchfield
General Counsel
(202) 336-7110

July 13, 1992

BY FACSIMILE

Mr. Laurence A. Tisch
Chairman and Chief
Executive Officer
CBS
51 West 52nd Street
New York, New York 10019

BY FACSIMILE

Mrs. Barbara Cochran
Vice President of CBS News
and Washington Bureau Chief
CBS
2020 M Street, N.W.
Washington, D.C. 20036

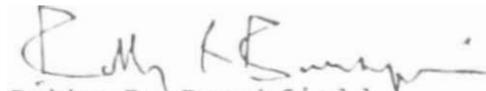
Dear Mr. Tisch and Ms. Cohen:

On Thursday, July 9, the "CBS Evening News With Dan Rather" ran a story on the recent announcement by Mr. Floyd Brown of his intention to air an independent political advertisement concerning Governor Bill Clinton. In introducing this segment, Mr. Rather stated: "The Bush-Quayle campaign people behind it ran one of the nastiest negative campaign attacks in the last Presidential election." The segment by Eric Engberg appropriately pointed out that Bush-Quayle '92 had deemed Mr. Brown's ad "absolutely despicable," and had demanded that he not run it.

Mr. Rather's superfluous and inaccurate editorial comment is at odds both with the facts and with Mr. Engberg's report. Like many other persons who expect objective news reporting from the networks, we find this incident unacceptable and believe a correction is necessary.

For your information, I am enclosing correspondence that makes absolutely clear that Mr. Brown has no affiliation with Bush-Quayle '92, and that Bush-Quayle '92 has done everything legally permissible to prevent his activities.

Sincerely,


Bobby R. Burchfield

Enclosure

cc: Mr. Dan Rather
Mr. Eric Engberg

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Bobby R. Burchfield
General Counsel
(202) 336-7110

July 9, 1992

VIA HAND DELIVERY

Mr. Floyd Brown
Presidential Victory Committee
38 Ivy Street, S.E., Suite A
Washington, D.C. 20003

Dear Mr. Brown:

Several sources reported this morning that the "Presidential Victory Committee," which you chair, plans to run advertisements containing allegations about Governor Bill Clinton and Ms. Gennifer Flowers. These reports also state that your group will operate a pay-per-call telephone message line that will play supposed excerpts from alleged conversations between Governor Clinton and Ms. Flowers.

On behalf of President Bush and Bush-Quayle '92, I strongly urge you to cease these activities. It is the policy of this campaign to keep tabloid sleaze out of this election campaign. Your attempt to resurrect these charges against Governor Clinton is absolutely despicable, and neither the President nor his campaign staff condone it in any way.

As you know, over the last several months Bush-Quayle '92 has taken all steps within the bounds of the law to prevent your organization from raising and spending money in a misleading and unethical manner. On March 9, 1992, I wrote to you at the instruction of President Bush demanding that you "immediately cease any and all activities" using the President's name. I have repeatedly informed the media that your activities are not authorized by the President or this campaign. (See Newsweek April 13, 1992, p.16). In addition, I have written to each of the 362 contributors shown on the "Presidential Victory Committee's" Federal Election Commission report advising each of them that your organization is neither condoned by nor affiliated with the President's re-election effort. Indeed, a number of

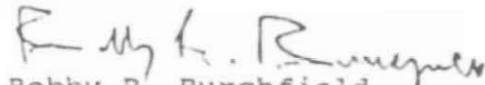
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Mr. Floyd Brown
July 9, 1992
Page Two

your contributors have sought refunds on the ground that they were misled by your fundraising solicitations. Finally, I have advised our Bush-Quayle staff as well as our state leadership that your group is not condoned by the President.

This latest action is yet another indication that you have no intention of operating within the bounds of ethics and propriety. Again, I urge you to cease all your activities, but especially these offensive ads and the related telephone message line.

Sincerely,


Bobby R. Burchfield

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Exhibit T

MACNEIL LINER NEWSHOUR INTERVIEW WITH: PRESIDENT GEORGE BUSH RECORDED
FOR AIR FRIDAY, JULY 10, 1992 AT THE CSCE CONFERENCE IN HELSINKI,
FINLAND

2-1 page# 1

dest, own, elecus, finland, humaid, yugo, un, canada, iraq, pergulf, cleanair
dest, handicap, childcare, natsec, ecdev
data

ROBERT MACNEIL: Mr. President, thank you very much for
joining us.

PRESIDENT BUSH: Glad to be here.

MR. MACNEIL: Can you explain in simple terms, to perhaps
bewildered Americans, why there is so much equivocation about
whether or whether not to use force to save the people of Sarajevo.

PRESIDENT BUSH: Well, I think people are reluctant to get
bogged down in a -- kind of a warfare like of guerrilla warfare,
and I also think that the main objective, now, of humanitarian
relief, is the, is the key thing. And that will mean there's some
forces involved in seeing that that happens.

We've got some Canadians on the ground there under U.N.
mandates. But I think, I think it's a reluctance on the part of
people to go storming into a situation that is very complicated from
a military standpoint. And also we think diplomatic pressure,
sanctions, and humanitarian relief is the answer right now.

MR. MACNEIL: Does it frustrate you -- you've said, quite
recently in fact, the U.S. is the sole superpower, you command the
strongest forces in the world, you have a lot of them right there in
Europe, and yet you're impotent to do anything about this which is
the sort of major blood-letting of our time.

PRESIDENT BUSH: I don't think we're impotent to do anything
about it. I think the course we've embarked on is the proper one,
and therefore I don't feel a sense of frustration. I feel a sense
of identity with the suffering. After I talked to the Bosnian
president yesterday, and his foreign minister, I mean, you can feel
the terrible human suffering.

But I think we're embarked, collectively, on a proper path for
now.

MR. MACNEIL: Wouldn't it rack up the pressure on the Serbs
and others who were doing the killing if you went to the Security
Council and asked for, with all the weight and prestige of your
office, and asked for a resolution authorizing the use of force,
whether you intended to use it immediately or not?

PRESIDENT BUSH: Well, I think that we've got authority to do
what needs to be done right now. But as you remember, back in

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Desert Storm days we did go periodically to the United Nations to step up the appropriate pressures on Saddam Hussein. But I think for now we're about what we ought to be with the United Nations.

MR. MACNEIL: You mentioned Desert Storm. Are you going to

MACNEIL LEHRER NEWSHOUR INTERVIEW WITH PRESIDENT GEORGE BUSH RECORDED FOR AIR FRIDAY, JULY 10, 1992 AT THE CSCE CONFERENCE IN HELSINKI, FINLAND

L-5-1 page# 2

ask the attorney general, or tell the attorney general to accept the request of the House Judiciary Committee yesterday for a special counsel to investigate the nature of the aid your administration gave Saddam before the war?

PRESIDENT BUSH: No. But what I am going to do is let the law, let the procedure set up under the Special Counsel Act work. And that means I will have no comment on it. I've already been on the record with my thoughts about what this is all about. But I won't even repeat that. This matter has now been sent to Justice under the way the law works and the Justice Department will do what it's supposed to do, which is thoroughly review the matter and see if there is, in their opinion, a finding for a special counsel. So I'd rather leave it right there. I've been advised by our attorneys that once you get into this legal process now, better leave the politics aside and let the system work.

MR. MACNEIL: Some of your people and -- and people in the Congress, Republicans in the Congress, say this is just Democrats trying to make an election year play. Do you agree with that?

PRESIDENT BUSH: Well, you misunderstood -- I guess it's not coming through across the ocean very well, because what I said was I'm not going to have any comment on it any further.

I stand with the statements that I've made in the past, though; Robin, and you can go back and look at those. But I've been told, really, let the legal system work and that's what I'm doing.

MR. MACNEIL: Well, let me try one more on you, Mr. President.

What do you say to Ross Perot who says, said the other day, that before the war you sent delegations to "burp and diaper and pamper" Saddam, and then, quoting Perot -- "when our manhood was questioned, we'll go off into the wild blue yonder with the lives of our servicemen at risk because of ten years of stupid mistakes."

PRESIDENT BUSH: Well, I don't comment about Ross Perot's charges. I maybe some day will. But I simply cite the historical record, where the whole world joined in what we did in kicking Saddam Hussein out of Kuwait. And I have no apologies for any part of this, and I'll be prepared to defend it entirely, and I can only cite that the American people fully supported it. Now a lot of members of Congress didn't, when we had to make the tough calls, but afterward I think there was a universal feeling that we did the right thing. And I've already said that some of trying to bring Saddam into the family of nations obviously didn't work. But I would prefer not to comment on what Mr. Perot has said.

MR. MACNEIL: Do you sense, in a general way, Mr. President, that your presidency is in a crisis at the moment?

PRESIDENT BUSH: No.

MACNEIL LEHRER NEWSHOUR INTERVIEW WITH PRESIDENT GEORGE BUSH RECORDED FOR AIR FRIDAY, JULY 10, 1992 AT THE CSCE CONFERENCE IN HELSINKI, FINLAND

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MR. MACNEIL: It seems to me, reading all the commentary that's going on, and listening to talk-shows, weird or otherwise you characterize some of them as weird -- that the criticism of you is becoming a lot more strident and a lot more -- a lot more blunt.

For instance, Jim Hoagland in the Washington Post yesterday said: there's no clearer definition of a failed administration than one that is unable to secure credit for its achievements or put its shortcomings in perspective for voters.

Would you agree that you're unable to do that at the moment?

PRESIDENT BUSH: I'd let the American people make that decision. One beautiful thing about an overly long election process is the American people will make the decisions. If I had to rely on the columnists from the Washington Post, I'm not sure that I would be acclaimed winner. But I think the American people can sort out the columns, right or left, and so I'd say I don't think the criticism is increasing. It's been pretty high, but I don't feel it's increasing.

MR. MACNEIL: The phrase I keep hearing and reading, and just hearing informally, and hearing on talk-shows, and reading, is that you simply don't get it. That's the phrase one hears -- Bush doesn't get it.

For all the symbolism of your efforts to show your sympathy with the common man, that you deeply do not understand the depth of unhappiness in the country on a whole range of issues.

PRESIDENT BUSH: I plead innocent to those charges. I think I've got some very good ideas and some concerns about the world. I think I've excellent proposals to do something about it. So I guess I've heard those charges but I just don't think they're true.

MR. MACNEIL: You do get it, you're saying?

PRESIDENT BUSH: I think I get it.

MR. MACNEIL: Another way it is put frequently is that in your three years as president you have preferred to move on the world stage and leave the domestic issues to a battle between the lions and tigers of the right and the center in your White House, with the result that what emerges is very often a very compromised policy that only nibbles at problems.

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MICHAEL LEHRER NEWSHOUR INTERVIEW WITH: PRESIDENT GEORGE BUSH RECORDED
FOR THE FRIDAY, JULY 10, 1992 AT THE CSCE CONFERENCE IN HELSINKI,

11/10/92

1. 2 pages 1

debt, wh, sw, elecus, hithcr, envrmt

debt, edev, taxes, budgus, defic, infl, intrst, nqrenf, crise, deped

data

economists that would say if we passed a capital gains reduction and passed an investment tax allowance, done something for the first-time home buyer, done something in terms of changing the IRAs, that would have had an immediate stimulating effect on the economy.

And I'll tell you what it would have had an effect -- and I think even those economists would agree -- it would have restored a sense of confidence. Now confidence is beginning to come back. Now economic growth is back. We grew, not as like -- as robust as I'd like to see the growth, but we saw it -- we grew pretty well in the, in the first quarter. We've got to do better. It's a slow growth. And I want to see it more dramatic.

And ~~the fact is that if the Congress had done on what I suggested, not only confidence would have come back, but those stimulants would have worked. I say past tense now because they didn't do it. I'd still like to see them do it, as a matter of fact.~~

MR. MACNEIL: On the economy --

PRESIDENT BUSH: And I'll make that challenge when I come back.

MR. MACNEIL: Okay. On the economy more generally. In 1980 you called the Reagan program "voodoo economics." Twelve years later, the national debt has quadrupled, the country has moved from being the greatest creditor nation to the largest debtor nation. The budget deficits are paralyzing government. Growth, the economic growth under your presidency has been less than it has under any presidency since World War II.

Does it ever occur to you, in the reaches of the night, that maybe you were right back in 1980, and that it was voodoo economics?

PRESIDENT BUSH: No, it doesn't occur to me.

MR. MACNEIL: So you -- does that mean that you are satisfied, if you are elected to a second term, in a general sense, to continue the Reagan-Bush economic policies that we've seen for 12 years?

PRESIDENT BUSH: It certainly means to do a better job getting through the Congress the proposals that I've made. I think they're conservative. I think they're extraordinarily sensible. It means

~~program and it's been the longest night news~~

But I would like education reform and anti-~~drug~~ and anti-~~the~~ antidrug fight. And in none of those are we finished. In all of those we have ~~passed sound, sensible proposals~~ that I feel passionately about ~~and that I will keep working on~~.

MACNEIL LEHRER NEWSHOUR INTERVIEW WITH PRESIDENT GEORGE BUSH RECORDED FOR AIR FRIDAY, JULY 10, 1992 AT THE OSCE CONFERENCE IN HELSINKI, FINLAND

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MR. MACNEIL: Are you suggesting that you

PRESIDENT BUSH: That --

MR. MACNEIL: You have devoted the kind of energy and commitment, and political commitment to either of those issues that you did, say, in the Gulf War?

PRESIDENT BUSH: Well, it depends what period of the Gulf War. The answer is yes, over a longer period of time, but we had a condensed period of decision-making in the Gulf War where the president said: Do this, do that, get it done. And so there was a time in there, Robert, just before we had to commit forces, with a lot of diplomatic work, and then of course signing off on a military program, that it was almost, you know, total, a total use of my time. But over the years, I think more time is spent on domestic than on foreign affairs.

MR. MACNEIL: Well, on health care, when you took office millions of Americans were without health insurance. Three and a half years later millions more are without and many have lost it, we have only partial insurance. Why did it take three years to come up with a health care plan?

PRESIDENT BUSH: Well, that's a good question. We've had parts of it up there. I think malpractice reform is a part of it. But I think as one realizes that these matters are not getting better and you've got an exacerbation of this issue because of the economy, I might add, you then put together a formal package. And I think that's what we've done. And you could say why haven't I why didn't I solve the problems of war and peace sooner, why didn't we solve the problems of the economy sooner. But ~~that's not a good proposal and I think that's the Oscewa proposal and it's not socialized medicine and that proposal that's going to diminish the quality of life and I think that's a good one~~.

MR. MACNEIL: I heard from a very senior former official, that when it looked as though -- that when it looked as though Jay Rockefeller was going to run for president -- and he's very associated with health care issues -- your White House people began to scramble and said we need a health care package.

And then when Jay Rockefeller declined to run, they said it, we don't need to bother. And then when Senator Wofford defeated your attorney general, Dick Thornburgh, on a health care platform in Pennsylvania, suddenly there was a health care plan.

That sounds -- that sounds a very cynical -- of looking at the need for a health care plan.

PRESIDENT BUSH: It is. And it's too cynical, and it's not true.

MACNEIL LEHRER NEWSHOUR INTERVIEW WITH: PRESIDENT GEORGE BUSH RECORDED FOR AIR FRIDAY, JULY 10, 1992 AT THE CSCE CONFERENCE IN HELSINKI, FINLAND

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MR. MACNEIL: It is not true?

PRESIDENT BUSH: No.

MR. MACNEIL: -- the man that I talked to about this was -- I can't use his name -- but he was approached --

PRESIDENT BUSH: Why?

MR. MACNEIL: -- by the White House.

PRESIDENT BUSH: Why can't you tell us?

MR. MACNEIL: Well, because --

PRESIDENT BUSH: Why can't you?

MR. MACNEIL: Because I was told it in confidence.

PRESIDENT BUSH: Oh, I see. The reason I asked the question is so much of this is anonymous sources, and it's very difficult to respond.

MR. MACNEIL: Well, I've told you the facts as they were told to me.

PRESIDENT BUSH: Yes.

MR. MACNEIL: On the environment -- let's take another issue on which you've taken a lot of heat. You hired a leading environmentalist, William Reilly, as the head of the EPA, and you were applauded for doing that, and you were applauded for some of the early moves you made on the environment. But since then it's appeared to many people that you've continually let Mr. Reilly be humiliated and blocked by people like John Sununu or Dan Quayle. If you are the environmental president, why don't you stand up and defend your own environmentalist?

PRESIDENT BUSH: Not only do I defend him, but I would refer you to this words. I would refer you to Bill Reilly's words about our environmentalist record. He has been an integral part of it all. He is very proud of the achievements. And I -- so I would simply refer you to what Reilly himself says, because I do think he's a good, sound environmentalist, about the achievements of the Bush administration in this field.

MR. MACNEIL: Was it good leadership to permit this country, which has on the whole a good environmental record as you've claimed

PRESIDENT BUSH: s.

MR. MACNEIL: -- to be dragged, kicking and screaming, to the first Earth Summit in Rio, and yourself made a pariah before the

MACNEIL LEHRER NEWSHOUR INTERVIEW WITH PRESIDENT GEORGE BUSH RECORDED FOR AIR FRIDAY, JULY 10, 1992 AT THE CSCE CONFERENCE IN HELSINKI, FINLAND

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rest of the world? Was that -- was that good diplomacy and was it good leadership to do that?

CONTINUED

MACNEIL LEHRER NEWSHOUR INTERVIEW WITH: PRESIDENT GEORGE BUSH RECORDED FOR HIS FRIDAY, JULY 10, 1992 AT THE OSCE CONFERENCE IN HELSINKI, FINLAND

L 5 3 1 page# 1

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PRESIDENT BUSH: Well, the question's slightly pejorative. ~~What was the point of the climate change agreement before it was signed? It was just a piece of paper. On the most standards that we feel we should meet.~~

You know, we've spent \$800 billion in the last 10 years on the environment, and we're projected to spend \$1.2 trillion in the next 10 years.

And so we, we did -- we used diplomacy and negotiation properly and entered into a global climate change agreement that everybody else agreed with.

MR. MACNEIL: Do you think --

PRESIDENT BUSH: ~~I think that's leadership.~~ On biodiversity, that was something else. Yeah, excuse me?

MR. MACNEIL: I beg your pardon. Did it do the reputation of this country good in net terms with the rest of the world, do you think?

PRESIDENT BUSH: Well, you know, I have a feeling that ~~how a country stands up for what it believes in, that's leadership. I think going along with something and then not intending to comply with it is not leadership.~~

And so ~~I think the record is that we've been out there and stood up and said we are not going to enter into a treaty that does not protect the most advanced science in the world that'll be other countries in biodiversity.~~

And so I don't think leadership, Robin, is going along with the mob. I don't think it's going to the extremes either in the environmental movement.

~~I would cite the environmental record that you cited, Bill Kelly, as someone who agrees with that.~~

MR. MACNEIL: Just finally, turning to the campaign. You said

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MACNEIL LEHRER NEWSHOUR INTERVIEW WITH: PRESIDENT GEORGE BUSH RECORDED
FOR AIR FRIDAY, JULY 10, 1992 AT THE CSCE CONFERENCE IN HELSINKI,
FINLAND

L-5-3-E page# 2

What instructions have you given to keep it clean this year?

PRESIDENT BUSH: Well, I sent out a written instruction to stay out of the sleaze business that so many people seem to be fascinated with. And I hope our campaign is fully complying with that. I think it is. And I think that's very important. We'll fight it on the issues. Dog eat dog is correct.

Let me point out something to you, Robin. Right now, I could cite case after case, literally hundreds of references and attacks on me by both the independent candidate and the Democratic nominee.

And I don't think you can cite that, maybe a handful of exceptions to prove my rule, on my case. What I mean is, that when we join the battle, part of my job will be to point out these differences much more clearly and succinctly with the candidates.

For now I've been trying to get something done. It happens to be about world peace over here. It happens to be about U.S. leadership in terms of trying to do something about the humanitarian relief for Bosnia. But when I get back, and after these conventions, what I'm talking about is a willingness to stand up and fight for what I believe in.

And if that means pointing out the fact from some of the fiction that's been fed to the American people through the other candidates, I'm prepared to do it.

MR. MACNEIL: Let me just --

PRESIDENT BUSH: I haven't done it. And I think some of our campaign people are saying I wish he'd hurry up and do that.

MR. MACNEIL: Well, let me just ask you -- let me just ask you

PRESIDENT BUSH: Yeah.

MR. MACNEIL: -- I have a second left -- about one, one thing.

Floyd Brown, the man who created the famous Willie, the notorious Willie Horton ad, has come up with a fax he's sent everybody, it's right here, headed with a headline, "Presidential Victory Committee," in which he's suggesting people call an 800 number to hear material revealing what he calls the true character of Bill Clinton. There are a lot of tape recordings of the woman

other, but you've also said you would go at this as a "dog-eat-dog fight."

PRESIDENT BUSH: Yeah.

MR. MACNEIL: What will you, -- what will you not do this year.

MACNEIL LEHRER NEWSHOOR INTERVIEW WITH PRESIDENT GEORGE BUSH RECORDED FOR AIR FRIDAY, JULY 10, 1992 AT THE OSCE CONFERENCE IN HELSINKI, FINLAND

L-5-3-E page# 2

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who's been mentioned in the case, and everything. If you don't approve of that, will you repudiate it? Will you tell him to stop it?

PRESIDENT BUSH: Yeah, right now, I will tell -- we have told him to stop it. We've had our lawyers in touch with him and told him to stop it. And I repudiate it now as the kind of sleaze that

MACNEIL LEHRER NEWSHOUR INTERVIEW WITH PRESIDENT GEORGE BUSH RECORDED FOR AIR FRIDAY, JULY 10, 1992 AT THE CSCE CONFERENCE IN HELSINKI, FINLAND

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diminishes the political process.

And I'm surprised it was repeated on such a wonderful show as this. But it gives me the chance to say we're not in that business. That man knows that he ought to stop it. We know he shouldn't be using that name, the "Committee". There's nothing we can do about it legally. But I hope what I'm telling you now resonates all across this country. I disapprove of it, we -- our lawyers have told him to stop it, and I hope he does, and I'm going to try to keep this campaign on the issues.

MR. MACNEIL: Well, Mr. President, thank you very much for your time.

PRESIDENT BUSH: Thank you, Robin.

END

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Exhibit U



My Fellow Conservative,

As Chairman of the Presidential Victory Committee's Citizens for Bush national campaign, I have sent you a copy of my personal check for \$92.

A check that I have made out directly to the Presidential Victory Committee.

I ask you today, for America, to at least match my own donation to the Presidential Victory Committee's special election-year project, Citizens for Bush.

That's all I want.

I want you to match my conviction and honor.

With dedication and responsibility, I ask you to help re-elect George Bush as President for three crucial reasons:

First, George Bush is a president of honor, integrity and devotion to everything you hold dear.

Second, George Bush has devoted his entire life to the service of America.

And third, George Bush knows how to stand up to the liberals in Congress who only want to spend and tax.

You know as well as I that if anyone other than George Bush is elected to the White House in November, it will spell disaster for America.

Let me quickly explain to you why Citizens for Bush, the Presidential Victory Committee's premier election-year project, is so important to America.

Citizens for Bush, a very special project of the Presidential Victory Committee, has only one goal:

To help make sure George Bush is re-elected President of the United States in November.

And as National Chairman of Citizens for Bush, I am completely committed to this battle.

I have sacrificed everything for the sake of Citizens

38 Ivy Street S.E., Suite A * Washington, D.C. 20003

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for Bush.

You can clearly see what this effort means to me.

You can see why I'm putting my own hard-earned money where my mouth is when it comes to Citizens for Bush.

Will you do the same?

Will you match my own contribution?

I know these are tough economic times.

But that's precisely why you and I must pool our resources to fight for America's secure future with the re-election of George Bush.

You've heard the Democrats' so-called economic plan for America.

I call it economic DISASTER for America.

Every one of the Democrat presidential candidates advocates some sort of nationally-sponsored health care plan.

And while I believe, as President Bush does, that health care is important...

...it is criminal to bankrupt America with the Democrats' socialist schemes that will not help you at all!

America is drowning in debt already, thanks to liberal spending.

Can you imagine how expensive the liberals' government-run hospitals and clinics will be?

And you know who will foot the liberals' bill.

YOU.

That's right.

You and every other faithful, hard-working American taxpayer will have to fund the liberals' outrageous programs.

You see, the Democrats' plans call for either the federal government or each state, or both, to fund their national health care bills, new welfare proposals and countless other programs.

You know as well as I that already America's federal deficit is almost \$3.5 TRILLION.

I know it's hard to even comprehend that much money, but

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that's how much the United States government owes.

Think of your own bills.

You know how tough it is sometimes to meet each payment.

Well, think of meeting a \$3.5 TRILLION payment.

And on top of that, the liberal Democrats now want to tack on the cost of a health care system which will cost HUNDREDS of BILLIONS of dollars!

My friend, I'm only using this one point to illustrate how the liberals will destroy America's economy once and for all if they gain control of the White House.

That's why I founded Citizens for Bush:

To fight for the sound economy President Bush has helped create for America.

And that's why I've staked all I have on this special project of the Presidential Victory Committee:

To preserve and continue America's economic recovery.

Please, stand with me now.

Stand with me and Citizens for Bush and help ensure victory in November for all you and I cherish.

You hold a copy of my personal check.

You can clearly see that I've put my own money where my mouth -- and my heart -- are.

I must ask you now to do the same.

You see that I've written this check for \$92.

All I ask is for you match my check with a check of your own made out for \$92 today.

A \$92 contribution will make you eligible for Citizens for Bush's special Victory Committee.

Likewise, if you can give \$184, you will become part of Citizens for Bush's Double Victory Committee.

If you can send a check for \$276, you will immediately become a part of the Triple Victory Committee.

And, your special \$1,000 contribution will be honored with your elevation into the President's Club.

The President's Club is Citizens for Bush's most

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exclusive committee.

It is comprised of only our most ardent supporters.

Will you accept the challenge of becoming a part of Citizens for Bush's President's Club?

I hope you understand the importance of my request.

If you cannot commit the full \$1,000 to becoming a supporter of the President's Club right now, I understand.

But your support, your contribution, be it \$92, \$184 or \$296, is absolutely vital.

You hold a copy of my personal check to the Presidential Victory Committee's special project, Citizens for Bush.

I'm asking you to return my check and at least match it with a check of your own made out for \$92.

Time is running out.

The first primaries of the season are over.

You may not believe it, but President Bush's supporters are counting the time before the national convention and election in weeks, not months.

Please, make your commitment to Citizens for Bush right now; don't waste another minute.

I hope I've explained how critical your voice is.

Rush your urgent support to me today.

Thank you.

Sincerely,
Floyd D. Brown
Floyd Brown
National Chairman

P.S. With your contribution of \$1,000, I will welcome you to the Citizens for Bush President's Club. You may also join our Triple and Double Victory Committees. But please, return and at least match my personal check with your own check for \$92. Thank you again. Your commitment is crucial.

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**OFFICIAL REPLY TO
NATIONAL CHAIRMAN FLOYD BROWN
CITIZENS FOR BUSH**

Dear National Chairman Brown,

Thank you for your very frank letter. I, too, realize the time for action has come. I support you and Citizens for Bush and our battle for a secure future through George Bush's re-election as President.

I am returning your check along with my own check for:

- () \$1,000 PRESIDENT'S CLUB
- () \$276 TRIPLE VICTORY COMMITTEE
- () \$184 DOUBLE VICTORY COMMITTEE
- () \$ 92 VICTORY COMMITTEE

I cannot send \$92, but to help I can send: \$ _____

Please consider me a CITIZENS FOR BUSH TEAM PLAYER.

Please make your check to: **THE PRESIDENTIAL VICTORY COMMITTEE**
Washington, D.C. 20069-1103

NAME: _____

ADDRESS: _____

CITY/STATE/ZIP: _____

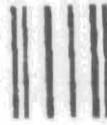
TELEPHONE: _____

*38 Ivy Street S.E., Suite A * Washington, D.C. 20003*

Paid for by the Presidential Victory Committee, and not authorized by any candidate or candidate's committee.
Citizens for Bush is a project of Presidential Victory Committee and is an Independent Expenditure effort not affiliated in any way with Bush-Quayle '92.
Contributors to the Presidential Victory Committee are not deductible as charitable contributions for federal income tax purposes.
The Federal Election Commission requires we ask.

Occupation: _____ Employer: _____

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NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

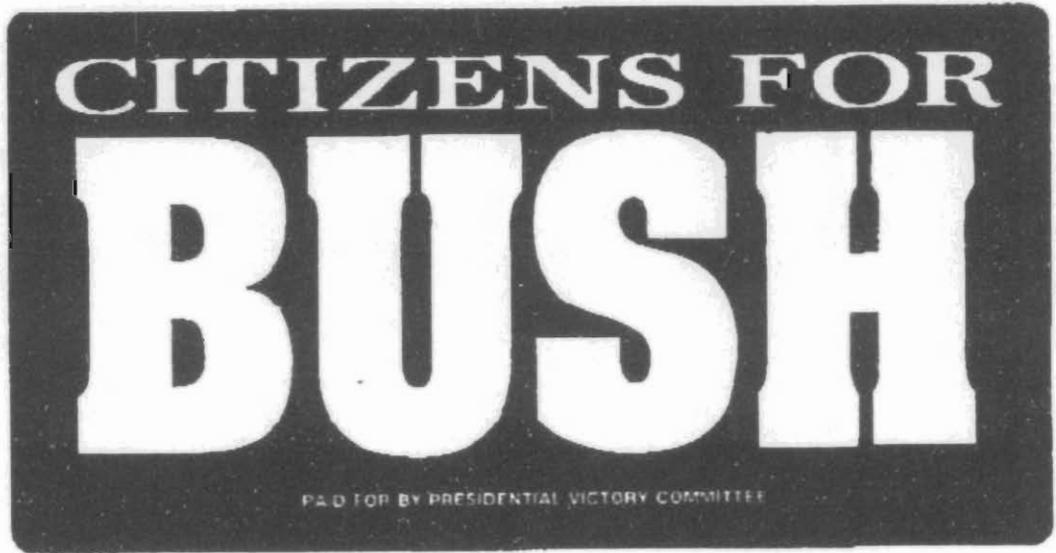
BUSINESS REPLY MAIL
FIRST CLASS PERMIT NO. 18665 WASHINGTON, D.C.

POSTAGE WILL BE PAID BY ADDRESSEE

CITIZENS FOR BUSH
A PROJECT OF PRESIDENTIAL VICTORY COMMITTEE
Washington, D.C. 20070-1103



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	FLOYD G. BROWN WASHINGTON, D.C. 20003	2017
		<i>March 10</i> 19 <i>92</i> 08-537/580
Pay To The Order Of	<i>Presidential Victory Committee</i>	92.00
	<i>Ninety two and 00/100</i>	Dollars
PATRIOT NATIONAL BANK OF RESTON RESTON, VA 22090		
For	<i>Citizens for Bush</i>	<i>Floyd G. Brown</i>



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 16, 1992

Bobby R. Burchfield, General Counsel
Bush-Quayle 92
1030 15th Street N.W.
Washington, D.C. 20005

RE: MUR 3556
Floyd Brown
Citizens for Bush
Presidential Victory Committee,
and Robert E. Miller, treasurer

Dear Mr. Burchfield:

This letter acknowledges receipt on July 14, 1992, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Floyd Brown, Citizens for Bush, the Presidential Victory Committee, and Robert E. Miller, 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 3556. 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.

Sincerely,

Lisa E Klein (by xrn)
Lisa E. Klein
Assistant General Counsel

Enclosure
Procedures

23740935124



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 16, 1992

Elizabeth I. Fediay, Treasurer
National Security Political Action Committee
3200 Morrison Street, N.W.
Washington, D.C. 20015

RE: MUR 3556

Dear Ms. Fediay:

The Federal Election Commission received a complaint which contains information which indicates that the National Security Political Action Committee ("Committee"), and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended "the Act". A copy of the written complaint is enclosed. The complainants have also submitted the enclosed videotape as evidence of the violation(s). We have numbered this matter MUR 3556. 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 the Committee 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.

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Elizabeth I. Fediay, Treasurer
National Security Political Action Committee
Page 2

If you have any questions, please contact Xavier K. McDonnell, the attorney assigned to this matter, at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lisa E Klein (eykm)

Lisa E. Klein
Assistant General Counsel

Enclosures

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

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 16, 1992

Robert E. Miller, Jr., Treasurer
Citizens for Bush
Presidential Victory Committee
38 Ivy Street, S.E.
Suite A
Washington, D.C. 20003

RE: MUR 3556
Presidential Victory Committee
Citizens for Bush
and Robert E. Miller, treasurer

Dear Mr. Miller:

The Federal Election Commission received a complaint which indicates that the Presidential Victory Committee ("Committee"), the "Citizens for Bush" project, and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended "the Act". A copy of the written complaint is enclosed. The complainants have also submitted the enclosed videotape as evidence of the violation(s). We have numbered this matter MUR 3556. Please refer to this number in all future correspondence.

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Robert E. Miller, Treasurer
Presidential Victory Committee
Citizens for Bush
Page 2

If you have any questions, please contact Xavier K. McDonnell, the attorney assigned to this matter, at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

X Lisa E Klein (BJM)

Lisa E. Klein
Assistant General Counsel

Enclosures

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

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 16, 1992

Floyd Brown
38 Ivy Street S.E.
Suite A
Washington, D.C. 20003

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Floyd Brown
Page 2

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Sincerely,

Lisa E. Klein (Bjkm)

Lisa E. Klein
Assistant General Counsel

Enclosures

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

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OGC 6003

WILLIAM J. OLSON, P.C.

ATTORNEYS AT LAW

8180 GREENSBORO DRIVE, SUITE 1070
MCLEAN, VIRGINIA 22102-3823

TELEPHONE (703) 356-5070
FAX (703) 356-5085

WILLIAM J. OLSON
D.C., VA
JOHN S. MILES
D.C., MD., OF COUNSEL
GILMAN & PANGIA
OF COUNSEL

1815 H STREET, N.W.
SUITE 600
WASHINGTON, D.C. 20006-3604
TELEPHONE (202) 223-9066
FAX (202) 331-8986

August 4, 1992
HAND DELIVER

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

Attention: Lisa E. Klein
Assistant General Counsel

Re: Presidential Victory Committee
(Citizens for Bush) and
Floyd G. Brown; MUR 3556

RECEIVED
FEDERAL ELECTION COMMISSION
AUG 4 1992
92 AUG -4 PM 5:18

Dear Sirs:

This firm represents Presidential Victory Committee (including Citizens for Bush) and Floyd G. Brown (collectively referred to herein as "Respondents") in the above-referenced matter. By letters dated July 16, 1992, which we are advised were received by the Respondents on July 20, 1992, you indicated that the Federal Election Commission ("FEC") had received a complaint indicating that the Respondents may have violated the Federal Election Campaign Act of 1971 ("FECA"), and you invited their response within 15 days of receipt of your letters. Enclosed are the Statements of Designation of Counsel, signed by Floyd G. Brown, for himself, and by Robert E. Miller, Jr., Treasurer for the Presidential Victory Committee, including Citizens for Bush, designating the undersigned as counsel in this matter, in accordance with your instructions.

This matter was instituted following the filing of a letter of complaint by Bobby R. Burchfield, Esquire, on behalf of President George Bush, Bush-Quayle '92 Primary Committee, Inc. and Bush-Quayle '92 Compliance Committee, Inc. (referred to herein collectively as "Bush-Quayle '92"), on or about July 14, 1992. Essentially, and apart from rhetoric, the complaint alleges (1) that the Respondents have violated the provisions of 11 C.F.R. section 110.11(a)(1)(iii) by failing to conform to the disclaimer requirements as expressly set forth in law, and (2) that the Respondents have misled contributors about the purpose

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for which contributions will be used. (See letter of complaint, pp. 7-8.)

Neither allegation is sustainable, as will be set out in more detail below. Indeed, the letter of complaint is such an obvious political maneuver, and is so patently frivolous, that the letter of complaint should be dismissed, and this MUR should be closed, forthwith.

We are writing in response to your letters dated July 16, 1992, to Floyd G. Brown and to the Presidential Victory Committee (also referred to herein as "PVC") requesting such a response, to demonstrate that no action should be taken against any of the Respondents in this matter. It is our clients' position that the facts and the law are so clear with respect to the alleged violations that there is nothing to investigate and there is no substance to the charges of alleged violations.

PART I: RESPONSE TO THE SPECIFIC CHARGES OF THE COMPLAINT

After engaging in six and one-half pages of many irrelevant facts, diatribe and disparaging remarks, Bush-Quayle '92 purports to focus on the Respondents' "straight-forward and simple" alleged "violations" (letter of complaint, p. 7):

Alleged Violation #1: "Respondent's fundraising disclaimers are ambiguous and clearly inadequate to satisfy the terms and objectives of 11 C.F.R. Section 110.11(a)(1)(iii)."

Response: The Respondents' fundraising disclaimers adhere to the letter of the law. The regulation in question, 11 C.F.R. section 110.11(a)(1)(iii), reads as follows:

(a)(1) Except as provided at 11 CFR 110.11(a)(2), whenever any person makes an expenditure for the purpose of financing a communication that expressly advocates the election or defeat of a clearly identified candidate, or that solicits any contribution, through any broadcasting station, newspaper, magazine, outdoor advertising facility, poster, yard sign, direct mailing or any other form of general public political advertising, a disclaimer meeting the requirements of 11 CFR 110.11(a)(1)(i), (ii), (iii) or (iv) shall appear and be presented in a clear and conspicuous manner to give the reader, observer or listener adequate notice of the identify of persons who paid for and, where required, who authorized the communication. Such person is not required to place the disclaimer on the front face or page of any such materials, as long as a disclaimer

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appears within the communication, except on communications, such as billboards, that contain only a front face....

(iii) Such communication, including any solicitation, if made on behalf of or in opposition to a candidate, but paid for by any other person and not authorized by a candidate, authorized committee of a candidate or its agent, shall clearly state that the communication has been paid for by such person and is not authorized by any candidate or candidate's committee.

The question, then, is whether the fundraising solicitations of Presidential Victory Committee contain the required disclaimers.

The answer is that they do. The fundraising solicitations of Presidential Victory Committee are in full compliance with all requirements of law. Indeed, the falsity of the assertion in the letter of complaint that the respondents have violated section 110.11(a)(1)(iii) of the Regulations is proved by the very attachments to the letter of complaint. The fundraising solicitations of Presidential Victory Committee contain either of the following disclaimers:

Paid for by the Presidential Victory Committee, and not authorized by any candidate or candidate's committee. (Citizens for Bush is a project of Presidential Victory Committee and is an Independent Expenditure effort not affiliated in any way with Bush-Quayle '92.) Contributions or gifts to the Presidential Victory Committee are not deductible as charitable contributions for federal income tax purposes. [letter of complaint, Exhibit I]

Paid for by the Presidential Victory Committee, and not authorized by any candidate or candidate's committee. Contributions or gifts to the Presidential Victory Committee are not deductible as charitable contributions for federal income tax purposes. [letter of complaint, Exhibit J.]

These disclaimers appear in all of the Respondents' material in which they are supposed to appear, including the video tape that was submitted by the Complainant. And these disclaimers, although in some instances going well beyond what the law requires, in all instances appear to have complied in full with all requirements of the law.

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Again, despite the bald -- and false -- assertion in the letter of complaint that the respondents have violated the regulations, the undisputed facts show that they have not. The fundraising solicitations of Presidential Victory Committee are in full compliance with the law.

Alleged Violation #2: "Respondents have misled their contributors about the purpose for which they will use the contributions. By stating that every dollar you contribute will help Citizens for Bush fight to keep George Bush in the White House, and then spending substantial sums of money in support of Congressional and Senatorial candidates, Respondents are engaged in intentionally deceptive activities.")

Response: The allegation is false, as revealed by the very materials submitted as exhibits to the letter of complaint. Fundraising solicitations of Presidential Victory Committee on their face contain statements that identify the interrelated purposes of Presidential Victory Committee's Independent Expenditure effort. For example, Exhibit J to the letter of complaint, a fundraising solicitation dated June 25, 1992, contains the following language:

I need your support to tell our Conservative candidates to Congress that we are committed to their victory. [letter of complaint, Exhibit J, p. 4.]

The PVC's independent efforts on behalf of the President and other Conservative candidates to Congress cannot succeed without your generous support right now. [letter of complaint, Exhibit J, p. 5.]

Floyd, I have completed and returned my official Presidential Ballot to you. To help you fight for President Bush's re-election, and the election of Conservatives to Congress, I enclose... [letter of complaint, Exhibit J, p. 5, tear-off portion.]

Obviously, not every fund-raising solicitation is the same, but it is evident from the above that contributors were well informed about Presidential Victory Committee's efforts on behalf of conservative candidates for Congress, as well as its efforts for President Bush.

There are many, many more arguments that could be advanced against the political maneuver of submitting a letter of complaint to the FEC as Bush-Quayle '92 has done, with groundless

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accusations. Some of these arguments are referenced in Part II, below, where the Respondents have pointed out additional reasons why the letter of complaint lacks merit. At this point, however, particularly in light of Bush-Quayle '92's supposedly "straight-forward and simple" allegations of "violations" (letter of complaint, page 2), the Respondents wanted to focus on the essence of the complaint -- which is said to be that the Respondents violated FEC regulations -- to reveal the falsity of that allegation. It is false, the Respondents have not violated the law, and the complaint stating otherwise should be dismissed.

What is difficult to understand is how the complainant -- Bush-Quayle '92 -- has the temerity to submit a letter of complaint to the FEC that is (in conjunction with the very exhibits attached to support it) false on its face. The letter of complaint is a matter which, if filed in court, would merit immediate dismissal and, we submit, the possible imposition of sanctions. The complaint should be summarily dismissed.

PART II: RESPONSE TO OTHER DEFICIENCIES IN THE COMPLAINT

In addition to the critical deficiencies in the letter of complaint as set forth above, and its utter lack of merit insofar as it accuses the Respondents of violating federal election law, the letter of complaint is disingenuous, misleading and/or flatly incorrect in several other respects. The letter of complaint reveals that it was filed out of sheer political frustration with Respondents refusal to accept orders from Bush-Quayle '92. Bush-Quayle '92 apparently wants to control every expenditure (if not every effort) with respect to the 1992 Republican presidential race, but it should know that federal law will not countenance such control. Unfortunately, therefore, Bush-Quayle '92 has resorted to very questionable tactics, including its letter of complaint to the FEC, in an effort to beat down Presidential Victory Committee and obtain what it believes to be favorable publicity for itself. If there were a wrongdoer in this process, it would not be the Respondents, including Presidential Victory Committee, which was organized and is operating in furtherance of a constitutionally-protected process that is critical to the free exchange of ideas in the context of political campaigns in this country. The real wrongdoers would be the persons who would undermine that process, trying to destroy Independent Expenditure efforts in an effort to exclude citizen input into campaigns.

Bush-Quayle '92 has accused the Respondents of misleading contributors, but the facts in support of those allegations reveal that the Respondents have acted in accordance with the law. It is always theoretically possible that some contributors did ignore the disclaimers on Presidential Victory Committee's fundraising solicitations, and made contributions to Presidential Victory Committee in the mistaken belief that they were donating funds to Bush-Quayle '92, but some people misread anything, and,

with proper disclaimers having been used, it is not likely that there would be many such contributors.¹ Furthermore, the possibility that some contributors may have acted in such a mistaken belief is not any evidence at all that the Respondents acted improperly. On the contrary, as has already been shown above, the Respondents adhered to all requirements of the law, and the allegations of impropriety are without foundation.

In Part I above, it was demonstrated that the allegations in the letter of complaint that the Respondents violated the law lacked any merit and should be summarily dismissed. Nevertheless, the letter of complaint, consisting of nine pages, single-spaced and dozens of pages of exhibits, and a videotape, contains numerous false arguments and misleading statements. Those errors should be addressed here, and are set out below with a brief explication of their falsity or misleading nature.

A. The opening paragraph of the letter of complaint is replete with false promise and error.

As mentioned in Part I above, the only alleged "violations" (asserted at pages 7-8 of the letter of complaint) have to do with (1) an alleged violation of section 110.11(a)(1)(iii) of the Regulations, and (2) a general charge, without any reference to the Federal Election Campaign Act, that the Presidential Victory Committee's fund-raising solicitations falsely promised that all donations would be used to help re-elect President Bush. Both of those allegations are false, as demonstrated above.

In addition to the false statements (that "the Respondents have engaged in a pattern of...activities...in violation of...")

¹ Attached as Exhibit N to the letter of complaint are copies of letters from persons who allegedly wrote to Presidential Victory Committee claiming that their contributions were made in the mistaken belief that Presidential Victory Committee was the authorized Bush-Quayle campaign committee and demanding refunds. These letters do not constitute evidence of any improper activity by the Respondents. Indeed, assuming that the persons who wrote those letters were actually operating under a mistaken impression when they made their contributions, at least some of them were clearly induced to act (and to demand refunds) by the highly questionable, hostile letter-writing campaign of Bush-Quayle '92, disparaging the efforts of the Respondents and actually inciting contributors to demand refunds (and then turn over the money to Complainant's Compliance Fund). See letter of complaint, Exhibits L, M and N. This self-aggrandizing, letter-writing campaign apparently attempted to mislead contributors into thinking that the efforts of Presidential Victory Committee were designed to damage the Bush re-election effort when, in fact, nothing could be further from the truth.

in the opening paragraph of the letter, that paragraph is also objectionable for raising the spectra of other alleged violations --- not discussed or even mentioned in the body of the complaint -- that are false. For example, nowhere in the body of the complaint is it argued that Presidential Victory Committee's fundraising solicitations violated 2 U.S.C. section 441d, 11 C.F.R. section 102.14(a), and 2 U.S.C. section 432(e)(4) and (5). Yet that is precisely what is alleged in the opening paragraph of the letter of complaint. This tactic of making a specious argument, with citations to the law, in an introductory paragraph, and then dropping the argument in the "substantive" section of the complaint, should not be rewarded.

Moreover, it is well known that the disclaimers used in Presidential Victory Committee's fundraising solicitations are in full compliance with the law. See Common Cause v. FEC, 842, F.2d 436 (D.C. Cir. 1988) (no violation by independent expenditure project in using candidate's name in project title). Indeed, that very subject has been the focus of FEC rulemaking, a proceeding of which Bush-Quayle '92 was fully aware and in which Bush-Quayle '92 participated by submitting comments. See letter of complaint, Exhibit K. These proposed regulations implicitly recognized that the use of a candidate's name in the title of an Independent Expenditure project is currently lawful. Indeed, when the FEC decided recently to adopt certain new regulations concerning special projects, but postponed the effective date of the new regulations until after this year's presidential election, Bush-Quayle '92 was well aware of the fact the Respondents' lawful solicitation activities could continue throughout the 1992 campaign period. Nevertheless, the letter of complaint was filed in an effort to thwart such lawful activity.

Finally, the opening paragraph states that "there is reason to believe" that Floyd G. Brown is in violation of a conciliation agreement approved by the FEC on October 1, 1990. In fact, there is no reason to believe that at all, as discussed in more detail below. It is apparent that this allegation -- which is not included in the "violations" section in the body of the complaint (at pages 7-8) -- was included in other sections of the letter of complaint in an effort to improperly drag Mr. Brown personally into this complaint process.

In short, the opening paragraph of the letter of complaint is misleading for alleging violations that are never even discussed in the body of the complaint, as well as for alleging purported violations that Bush-Quayle '92 knows full well are not violations at all.

B. The Summary of Allegations in the Complaint is inaccurate and misleading

In brief, the Summary of Allegations section of the letter of complaint is misleading in the following particulars:

(1) Although the Complainant makes it sound like the letter of complaint was precipitated "recently" by "uncontrovertible evidence" that Respondents' mailings were misleading "numerous" contributors, there is no such uncontrovertible evidence, and what Complainant apparently calls evidence is not that "recent." In fact, for months, Bush-Quayle '92 has threatened the Respondents and has attempted to convince contributors not only not to contribute to Presidential Victory Committee, but also to demand refunds of contributions already made. It has done so by trying to persuade contributors that only the "authorized campaign committee" is the proper recipient of their contributions, and that any other contributions would be harmful to the Bush-Quayle re-election effort. Respondents believe that Complainant is wrong in that view, of course, but Complainant apparently thinks that it is right. Nevertheless, its hostile and disparaging statements are misleading.

(2) Furthermore, by subtly focusing on the alleged deception of contributors, the Complainant has managed to avoid detailing any wrongful conduct by the Respondents. In other words, according to the Complainant, if someone was (allegedly) mistaken in making a contribution, it must be the result of the Respondents' wrongful conduct. Such a conclusion is not justified, of course, and is disproved by the evidence as already shown above, but even here, in analyzing the Summary of Allegations, it should be recognized as an unsupported, and false, charge.

(3) The Summary of Allegations states that the Respondents' actions are causing harm to the President's re-election effort "because of the Respondents' evident attempt to associate themselves with Bush-Quayle '92." Again, the statement is false and inappropriate. There has been no attempt by Respondents to associate themselves with Bush-Quayle '92. On the contrary, Presidential Victory Committee is an Independent Expenditure, and the Respondents have resisted any effort at accepting control or direction from Bush-Quayle '92. Indeed as counsel for Respondents wrote in response to Bush-Quayle '92's first formal "demand", the Respondents would resist any attempt to affiliate with the official campaign committee. See letter of complaint, Exhibit H.² Furthermore, as irrelevant an issue as this is,

² In this letter from counsel for Respondents to Bobby Burchfield, Esquire, the following request was made:

Furthermore, it is our view that the activities of Presidential Victory Committee, including the name of the Committee and its

there is no evidence that any activity by the Respondents has harmed the President's re-election efforts.³ Bush-Quayle '92, simply believes that Independent Expenditures in support of President Bush should not be allowed. Instead of saying it outright, the Complainant has dressed it up with unsupported allegations of unethical behavior and harm.

- C. The Statement of Facts fails to detail even one single instance of improper conduct on the part of the Respondents.

The Statement of Facts in the letter of complaint is comprised mostly of irrelevancies and false statements. They include the following:

(1) Mr. Brown's alleged activities in 1988, referred to at pages 2 and 3 of the letter of complaint, have nothing to do with the matter under review. Even if the Conciliation Agreement alleged at page 2 of the letter of complaint -- but not attached -- has been incorrectly characterized, paraphrased and quoted by the Complainant,⁴ we are advised that Mr. Brown was not a party to that Agreement, and was not bound by such Agreement. Furthermore, it is not clear how that Agreement in any way relates to the subject of this MUR. According to Complainant, Mr. Brown "cannot be allowed to engage in even more egregious activities by simply forming a different committee." (letter of complaint, p. 3.) That statement is difficult to follow. For one thing, Mr. Brown has not done anything wrong or illegal. Indeed, there is no allegation, in the "Violations" section of the letter of complaint, that there has been any violation by Mr. Brown of the alleged Conciliation Agreement. This subject apparently has been included in the Complainant's Statement of

project, are entirely proper under Federal Election Law. If you are aware of any law to the contrary, we would appreciate being so advised. [See letter of complaint, Exhibit H.]

Although counsel for Complainant has now waxed long about Respondent's alleged "violations," he never responded to this direct request for specifics about perceived violations of Federal Election Law, made over four months ago by counsel for Respondents.

³ Indeed, many political commentators express the view that thus far it has been President Bush's own official campaign leadership that has been ineffective or even counterproductive.

⁴ The Respondents do not have a copy of the Conciliation Agreement.

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Facts in an effort to improperly drag Mr. Brown personally into this MUR.

(2) Most of the Statement of Facts is simply an exposition of efforts to confirm that the Respondents have no connection or affiliation with Bush-Quayle '92. At pages 3 through 6 (Section C) of the letter of complaint, the Complainant has detailed a variety of efforts aimed at ensuring the public that Bush-Quayle '92 is in no way affiliated with the Respondents. It is clear that, soon after becoming aware of Respondent's fundraising activities, Bush-Quayle '92 began its program of threats, intimidation and disparagement in an effort to gain complete control over fundraising from conservatives in the 1992 presidential campaign. There is nothing in this section of the Statement of Facts detailing or imputing any wrongful conduct by or to the Respondents.

It is clear that the Complainant feels that Independent Expenditures -- at least those supporting the Bush-Quayle ticket -- should not be permitted. In one MUR (In the Matter of Auto Dealers and Drivers for Free Trade Political Action Committee, MUR 2766), former FEC Commissioner Thomas Josefiak specifically addressed this anti-Independent Expenditure attitude. In his Supporting Memorandum for the Statement of Reasons (June 13, 1990), offering his views supporting the FEC's declination of the Office of General Counsel's recommendation to find certain violations of the election law by certain Independent Expenditures, Commissioner Josefiak criticized those who start "from the widely held and seemingly unassailable assumption that the activity at issue in this matter -- large-scale independent expenditures in support of a candidate for U.S. Senate -- is inherently suspicious..." (p. 1). After reviewing the matter in depth and explaining his reasoning as to why the recommendation was properly declined, Commissioner Josefiak concluded (p. 27) as follows:

At some point, the Commission has to acknowledge that the players in the political process may know how to operate within the law. More importantly, the Commission must recognize that the law, and the Constitution, protects their right to do so.

Commissioner Josefiak's remarks were precipitated by his observations that undue emphasis on possible violations of the law in Independent Expenditure cases jeopardized the exercise of important free speech activity and ran the danger of discouraging that activity "by subjecting it to an initial presumption of illegality" and "continually rising hurdles of unfounded speculation" (p. 3).

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Nevertheless, Independent Expenditures are important to the political process in this country, and the right to conduct Independent Expenditures for or against a candidate or cause is an integral part of protected political speech under the First Amendment. The Supreme Court addressed the importance of these matters in Buckley v. Valeo, 424 U.S.1 (1976), where it stated, in discussing the limitations on contributions under FECA ("the Act") then in effect:

The Act's contribution and expenditure limitations operate in an area of the most fundamental First Amendment activities. Discussion of public issues and debate on the qualifications of candidates are integral to the operation of the system of government established by our Constitution. The First Amendment affords the broadest protection to such political expression in order "to assure [the] unfettered interchange of ideas for the bringing about of political and social changes desired by the people." Roth v. United States, 354 U.S. 476, 484 (1957). Although First Amendment protections are not confined to "the exposition of ideas," Winters v. New York, 333 U.S. 507, 510 (1948), "there is practically universal agreement that a major purpose of that Amendment was to protect the free discussion of governmental affairs...of course includ[ing] discussions of candidates...." Mills v. Alabama, 384 U.S. 214, 218 (1966). This no more than reflects our "profound national commitment to the principle that debate on public issues should be uninhibited, robust, and wide-open," New York Times Co. v. Sullivan, 376 U.S. 254, 270 (1964). In a republic where the people are sovereign, the ability of the citizenry to make informed choices among candidates for office is essential, for the identities of those who are elected will inevitably shape the course that we follow as a nation. As the Court observed in Monitor Patriot Co. v. Roy, 401 U.S. 265, 272 (1971), "it can hardly be doubted that the constitutional guarantee has its fullest and most urgent application precisely to the conduct of campaigns for political office." [Buckley v. Valeo, supra, 424 U.S. at 14-15.]

With respect to the limitations on Independent Expenditures, after noting that the essence of Independent Expenditures is

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their lack of coordination with an official campaign committee, the Court stated as follows:

While the independent expenditure ceiling thus fails to serve any substantial governmental interest in stemming the reality or appearance of corruption in the electoral process, it heavily burdens core First Amendment expression. For the First Amendment right to "speak one's mind...on all public institutions" includes the right to engage in "vigorous advocacy" no less than "abstract discussion'." New York Times Co. v. Sullivan, 376 U.S. at 269, quoting Bridges v. California, 314 U.S. 252, 270 (1941), and NAACP v. Button, 371 U.S., at 429. Advocacy of the election or defeat of candidates for federal office is no less entitled to protection under the First Amendment than the discussion of political policy generally or advocacy of the passage or defeat of legislation. [Buckley v. Valeo, supra, 424 U.S. at 47-48.]

It is important to point to the very important recognition accorded to Independent Expenditures under the law because the Complainant seems inclined to treat Independent Expenditures, at best, as something that should be heavily restricted, if tolerated at all. The specific point here, of course, is that the Respondents have done nothing wrong, and they have fully complied with the law. Any effort by the Complainant to seek to impose burdens on the Respondents outside of the law should be rejected.

D. The Complainant's reference to "Other Misleading Representations" is false and misleading

At pages 6-7 (Section D) of the letter of complaint, the Complainant alleges that the Respondents have engaged in "other" misrepresentations. That allegation is false for a number of reasons. First, there is no prior allegation of any misrepresentation at all. Thus, if this section of the letter details any misrepresentation, it will be the first.

Initially, the Complainant points to the statement contained in one of PVC's fundraising solicitations (Exhibit U to the letter of complaint) that "every dollar you contribute will help

Citizens for Bush fight to keep George Bush in the White House."⁵ Complainant says that that is a misrepresentation because the Respondents have made contributions to several candidates for the United States Congress. Obviously, as already explained above, the allegation of wrongdoing is unsupported. Presidential Victory Committee solicits contributions to assist Conservative candidates for Congress, and that fact is repeatedly referenced in its fundraising solicitations. See letter of complaint, Exhibit J. Furthermore, the Complainant's accusation -- that contributors would be misled by such a rhetorical phrase -- is so patently frivolous that it hardly needs to be rebutted. Clearly, the Complainant is reaching here and those efforts -- consisting of combing through the fundraising solicitations of PVC to try to find a single phrase that could conceivably be labeled a "misrepresentation," should be embarrassing for Bush-Quayle '92. There has, in fact, been no misrepresentation. Indeed, it is Respondents' position that the funds received from the early mailings were used to launch the Independent Expenditure effort for George Bush.⁶

E. The Relief Requested by the Complainant is not warranted, and the Complaint should be Dismissed.

The Complainant's prayers for relief, as set forth at pages 8-9 of the letter of complaint, and the Respondents' comments with respect thereto, are set forth below. Obviously, however, in light of the above, it is clear that the only appropriate relief here with respect to the Respondents is a dismissal of the complaint. The FEC may decide that an investigation into the Complainant's reasons for submitting such an unsupported complaint is the appropriate course. In any event, the specific prayers for relief -- and the Respondents' reply to each -- are as follows:

(1) an expedited investigation into the allegations of the complaint.

⁵ The alleged quotation set out at page 7 of the letter of complaint does not actually appear in the Presidential Victory Committee fundraising letter. See letter of complaint, Exhibit U.

⁶ The Complainant's speculation, at page 7 of the letter of complaint, that "Respondents' effort is doing little more than sustaining its principals and its direct-mail effort," is another example of an embarrassing statement for Bush-Quayle '92 that never should have been made. It does not even purport to be an alleged violation, and, like the rest of the complaint, it is lacking in factual and legal support.

Reply: there is no basis for an investigation, except perhaps an investigation into the Complainant's motivation in filing a complaint. The complaint is an outrage, lacking any coherent factual support and no legal support at all.

(2) order the Respondents to undertake a number of efforts, including notices and refunds to contributors, and certain disclaimers in future fundraising literature.

Reply: In addition to the fact that no relief of any kind against the Respondents is warranted, it should be pointed out that the requested relief is beyond the jurisdiction of the FEC.

(3) impose a substantial civil penalty on each of the Respondents.

Reply: In addition to the fact that no relief against any of the Respondents is warranted, it should be pointed out that this tactic of intimidation by the Complainant -- with particular reference to the prayer to assess a penalty against Mr. Brown personally -- is especially inappropriate in this case of a powerful presidential campaign committee proceeding against an Independent Expenditure effort and the person heading that effort. Added to this outrageous tactic is the fact that the complaint is totally lacking in substance and authority.

(4) Initiate proceedings in the United States District Court to enforce the Conciliation Agreement "against Mr. Brown."

Reply: In addition to the fact that no relief against the Respondents is warranted, as mentioned above, we are advised that the Conciliation Agreement did not involve Mr. Brown personally, and may not be enforced against him at all. Furthermore, to the best of Respondents' knowledge, that conciliation agreement (based upon the Complainant's own statements) has not been violated.

Respondents would respectfully request the dismissal of the complaint.

Sincerely yours,


William J. Olson

WJO:kh

Enclosures

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 3556

NAME OF COUNSEL: William J. Olson & John S. Miles

ADDRESS: William J. Olson, P.C.
8180 Greensboro Drive, Suite 1070
McLean, Virginia 22102-3823

TELEPHONE: (703) 352-5070

92 AUG -4 PM 5:20
RECEIVED COMMISSION
FEDERAL ELECTION
OFFICE

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.

7/27/92
Date

BY Robert E. Miller, Jr.
Signature
Robert E. Miller, Jr., Treasurer

RESPONDENT'S NAME: Presidential Victory Committee
(Citizens for Bush)

ADDRESS: 38 Ivy Street, S. E., Suite A
Washington, D.C. 20003

HOME PHONE: _____

BUSINESS PHONE: (202) 546-1992

23 9 235215

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3556 William J. Olson & John S. Miles

NAME OF COUNSEL: William J. Olson, P.C.

ADDRESS: 8180 Greensboro Drive

Suite 1070

McLean, VA 22102

TELEPHONE: (703) 356-5070

92 AUG 10 PM 3:17

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK

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.

August 3, 1992
Date

Floyd J. Brown
Signature

RESPONDENT'S NAME: Floyd Brown
Presidential Victory Committee

ADDRESS: 38 Ivy Street

Suite A

Washington, D.C. 20003

HOME PHONE: _____

BUSINESS PHONE: (202) 546-1992

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RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

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August 5, 1992

MUR 3556
National Security PAC and
Elizabeth Fediay, as Treasurer

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

ATTENTION: Xavier K. McDonnell, Esq.

92 AUG 12 PM 3:20

FEDERAL ELECTION
COMMISSION

Dear Mr. Noble:

This letter is filed with your office pursuant to 2 U.S.C. §437g(a)(1) on behalf of National Security PAC ("NSPAC") and Elizabeth I. Fediay as Treasurer. ("Respondents").

Upon review of the July 14, 1992 letter and exhibits sent to the Commission by Mr. Burchfield, General Counsel to the Bush-Quayle '92 Primary Committee, Inc., ("Complaint" or "Comp."), I am at a loss as to any factual bases upon which Respondents could allegedly have violated the Federal Election Campaign Act of 1971, as amended ("FECA"). I would request, for the reasons stated below, that the Commission make a finding of "no reason the believe" and close this matter, relative to Respondents.

I must initially state in the strongest terms possible that neither Respondents nor myself individually, have anything whatsoever to do with Mr. Brown's alleged activities nor those of the Presidential Victory Committee ("P.V.C.") or its project, "Citizens for Bush." In addition, in reviewing the videotape, identified in the Complaint as Physical Exhibit No. 1 (Comp. pp. 2 and 3), I see Mr. Brown has included television commercials produced in 1988 by NSPAC. Inclusion of those NSPAC television spots in the videotape or the other uses of those spots by Mr. Brown such as his 1992 press conferences, was done so without any authorization whatsoever by NSPAC or myself. Those spots are the exclusive property of NSPAC, and I have written to Mr. Brown stating he is not authorized to use any of them and to cease immediately. (See Exhibit "A")

I also wish to state, most clearly that NSPAC repudiates the use by P.V.C. of NSPAC'S name and T.V. product in the videotape and in other public arenas, such as press conferences. Those productions were made without the knowledge or authorization of

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Lawrence Noble, Esq.
August 4, 1992
Page 2

NSPAC or myself. I find it quite offensive, that Mr. Brown is attempting to give the impression that NSPAC is affiliated in any fashion with the PVC activities but, especially the "Jennifer Flowers- Bill Clinton " tapes.

Mr. Brown was a paid consultant to NSPAC in 1988 as were any number of other people. That is the extent of the affiliation between NSPAC and Mr. Brown. That relationship ceased after the 1988 campaign season. Mr. Brown has obviously pursued other activities and organizations neither of which I nor NSPAC are involved. The facts clearly demonstrate this point.

First, the P.V.C., Form 1, Statement of Organization shows a separate organization and officers from those involved with NSPAC. (See Comp. Exhibit "A" and "B").

Second, NSPAC is approximately \$1.2 million in debt and ceased activity for all intents and purposes in March, 1991. Neither Mr. Brown, PVC nor any of its employees or agents receives or has received any compensations from Respondents or myself individually. The PVC mailings, videotape and other activities, which form the bases of the alleged FECA violations in the Complaint are clearly activities financed and controlled by a committee and group of individuals not affiliated in any capacity with NSPAC. Correspondingly, you will note from NSPAC disclosure reports, NSPAC has not received any funds whatsoever from PVC activities. You will also note that PVC mailings do not mention NSPAC as being affiliated with PVC, nor even as a predecessor to PVC. In the Complaint, all disclaimer notices refer to PVC, (as they should) not to NSPAC.

I make these rather obvious factual statements to evidence, the fact Respondents have not participated, nor even condoned, the activities of PVC or Mr. Brown.

The Complaint appears to allege that based upon the activities of PVC and Mr. Brown, NSPAC has somehow violated the terms of the Conciliation Agreement which it entered into with the Commission in MUR 2638. (Comp. pp. 2,3,7,8 and 9). As the Commission can see from the facts setout above, there is absolutely no bases for such an allegation.

In addition to the fact that the alleged violations in the Complaint were not undertaken by NSPAC or any of its affiliates, it must be pointed out that Mr. Brown was not a Respondent or a party to the Conciliation Agreement in Mur 2638. NSPAC can not be held responsible for the present day activities of those individuals or entities who were consultants in 1988 to NSPAC, including Mr. Brown. The facts clearly show NSPAC does not even have a vehicle by which to influence the behavior of PVC or Mr. Brown. I wish we did in order that I could preclude their use of the 1988 NSPAC T.V. spots.

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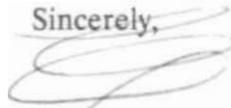
Lawrence Noble, Esq.
August 4, 1992
Page 3

I do find it somewhat amusing that the various individuals in 1992 are climbing aboard the BAND WAGON claiming credit for the various 1988 NSPAC T.V. spots and its other political activities. I wish those same individuals would have stepped forward to assume responsibility for the time, effort, legal fees and civil penalties I and NSPAC incurred as a result of the 1988 campaign. It must be nice to have such selective memories and attitudes.

In summary, the facts clearly show NSPAC can not be held accountable under the terms of the Conciliation Agreement in MUR 2638, nor under any factual scenario of affiliation or responsibility in general, for the activities or alleged FECA violations by Mr. Brown or PVC.

For those reasons, I request that the Commission make a no reason to be believe finding against the Respondents and close this matter as it pertains to them.

Sincerely,



Elizabeth I. Fediay
Treasurer, NSPAC.

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★ NATIONAL SECURITY POLITICAL ACTION COMMITTEE ★

August 5, 1992

Mr. Floyd Brown
Presidential Victory Committee, Inc.
38 Ivy Street, S.E.
Washington, D.C. 20003

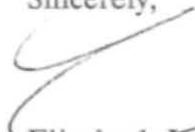
Dear Mr. Brown:

It has recently come to my attention that you and/or the Presidential Victory Committee (PVC) have been distributing videotapes that have included footage of National Security Political Action Committee (NSPAC) 1988 television commercials. Please be advised that any materials produced by NSPAC in 1988, or any other time, are the sole property of NSPAC and that you are not authorized to use them. Please cease using them immediately.

NSPAC disavows the use by PVC of NSPAC's name and products in any of its activities either in the private or public arenas.

Thank you for your prompt adherence to our request.

Sincerely,


Elizabeth I. Fedaiy
Treasurer, NSPAC

23040935220



OGC 6495

Bobby R. Burchfield
General Counsel
(202) 336-7110

September 16, 1992

HAND DELIVERED

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

92 SEP 17 PM 4:30

RECEIVED
FEDERAL ELECTION COMMISSION

RE: MUR 3556 -- Supplement to the Complaint by President George Bush, et al. against Floyd Brown, et al.

Dear Mr. Noble:

This letter constitutes a supplement to the Complaint filed by Bush - Quayle '92 on July 14, 1992, against Floyd G. Brown, the "Presidential Victory Committee", and the fundraising project "Citizens for Bush". The basis of the original Complaint was that Respondents have engaged in a pattern of misleading and deceptive fundraising and expenditures activities in violation of 2 U.S.C. § 441d, 11 C.F.R. § 110.11(a)(1)(iii), 2 U.S.C. § 432(e)(4) and (5), and 11 C.F.R. § 102.14(a).

As further evidence of the misleading and deceptive practices, I enclose copies of three letters. The first two letters (a July 16, 1992, letter from Mrs. Eleanor B. Thatcher to Mr. Floyd Brown requesting a return of \$475.00 and a September 7, 1992, letter to me from Mrs. Eva Batchelder requesting assistance in obtaining a refund of \$150.00) discuss the false impressions of Mr. Brown's solicitations. They should be filed as part of Exhibit N of the original Complaint. The third letter (a copy of a check made payable to "Citizens for Bush - Quayle '92" and mailed to the Bush - Quayle '92 National Headquarters, together with our cover letter returning the check) is further evidence of the misimpression created by Mr. Brown's solicitations. It should be filed as part of Exhibit O of the original Complaint.

Lawrence M. Noble, Esquire
September 16, 1992
Page 2

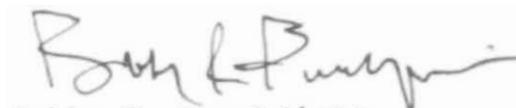
Please let me know if you need any further information in connection with the Complaint or this Supplement.

Sincerely,

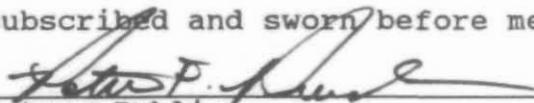

Bobby R. Burchfield

Verification

The undersigned swears that the facts set forth in this response are true to the best of his knowledge, information, and belief.


Bobby R. Burchfield

Subscribed and sworn before me this 17th day of September, 1992.



Notary Public

My Commission Expires
September 30, 1996

My Commission in the District of Columbia expires _____.

23040935222

M+M
GEORGE W. MORRIS, JR.

4127

18-130/1010

7/1 92

PAY TO THE ORDER OF

Citizen for Bush - Quayle 92 15262

Two hundred sixtytwo DOLLARS

885



Country Club Bank
Kansas City, Missouri 64112

Geo Morris

MEMO

GEORGE W. MORRIS, JR.
P.O. BOX 921
AMARILLO, TEXAS 79105



Citizen for Bush - Quayle
1030 15th St. N.W.
Washington D.C. 20005

3 6 6 5 2 6 0 4 3

23040935224

—

July 16, 1992

Mr. Floyd Brown
Presidential Victory Committee
38 Ivey Street, S. E.
Suite A
Washington, D.C. 20003

Re: REQUEST FOR RETURN OF FUNDS

Dear Mr. Brown - "Presidential Victory Committee":

I have personally contributed \$ 475.00 to the Mr. Floyd Brown "Presidential Victory Committee" under the false impression that this group is and/or was affiliated or authorized by President Bush. I have enclosed herewith correspondence from Bobby R. Burchfield, General Counsel, for Bush Quayle 92, as well as copies of the canceled checks.

I have consulted with my attorney and he urged me to write this letter to you demanding the return to me of my \$ 475.00 **IMMEDIATELY!!!!!!** Please forward to the following address:

Eleanor B. Thatcher

Mrs. Eleanor B. Thatcher
50 East Road
Apt. 7A
Delray Beach, FL 33483

cc: Bobby R. Burchfield
General Counsel

23040935225

3 0 4 0 2 3 5 2 2 6

EVA M. BATCHELDER 06-67 09926

June 14, 19 92 90-198/1211

PAY TO THE ORDER OF Presidential Victory Committee \$ 50.00
Fifty and 00/100 DOLLARS

Exchange Bank
ST. FRANCIS OFFICE PHONE 524-3333
 120 CALISTOGA RD. SANTA ROSA, CA 95409

FOR _____ Eva M. Batchelder

⑈0000005000⑈

EVA M. BATCHELDER 06-67 09906

5557 YERBA BUENA RD. 539-0668
 SANTA ROSA, CA 95409

June 5, 19 92 90-198/1211

PAY TO THE ORDER OF Presidential Victory Comm. \$ 100.00
One hundred and 00/100 DOLLARS

Exchange Bank
ST. FRANCIS OFFICE PHONE 524-3333
 120 CALISTOGA RD. SANTA ROSA, CA 95409

FOR _____ Eva M. Batchelder

⑈000000100000⑈

23040935227



Stan Huckaby, Treasurer

July 30, 1992

Mr. George W. Morris, Jr.
6515 Overbrook
Shawnee Mission, KS 66208

Dear Mr. Morris:

I am returning the contribution of \$262.00 which you mailed to our National Campaign Headquarters in Washington, D.C. While your desire to contribute to the President's re-election is greatly appreciated, you should know that "Citizens for Bush: A Project of Presidential Victory Committee" is not affiliated with the President's re-election effort and, in fact, is not authorized to use the President's name to solicit money.

I apologize for the misleading impression this group has given to you that your contribution would be used for the President's re-election. Should you desire to support the President's re-election, you should reissue your check and make it payable to "Bush - Quayle '92 - Primary Committee, Inc.," the President's principal campaign committee and the only committee authorized to receive contributions and make expenditures on behalf of the President. For your convenience, I have enclosed a response card and a postage-paid return envelope.

Again, I thank you for your support of President Bush and Vice President Quayle.

Sincerely,

J. Stanley Huckaby
Treasurer

Enclosures

23040935229

M+M

GEORGE W. MORRIS, JR.

4127

7/1 1992

PAY TO THE ORDER OF

Citizen for Bush - Quayle 92 \$262

Two hundred sixty two DOLLARS

 Country Club Bank
KANSAS CITY, MISSOURI 64112

Geo Morris

MEMO



Bobby R. Burchfield
General Counsel
(202) 336-7110

August 27, 1992

Eva Batchelder
5557 Yerba Buena Rd.
Santa Rosa, CA 95409

Dear Ms. Batchelder:

From Federal Election Commission records, it appears that you have contributed to a project called "Citizens for Bush." This project, organized and operated by the "Presidential Victory Committee," is neither authorized nor affiliated with the President's re-election campaign. The only two committees affiliated with the President's campaign are Bush-Quayle 92 Primary Committee, Inc. and Bush-Quayle 92 Compliance Committee, Inc.

On March 9, 1992, I wrote to Mr. Brown on behalf of President Bush and Bush-Quayle 92 demanding that he immediately cease any and all activities undertaken in the President's name. A copy of that letter is attached.

If you contributed to "Citizens for Bush" or the "Presidential Victory Committee" under the false impression that those groups are affiliated or authorized by President Bush, you may write to that Committee to request a refund. Should you desire to do so, the address is:

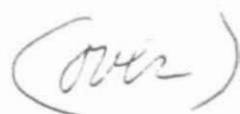
Mr. Floyd Brown
Presidential Victory Committee
38 Ivy Street, S.E.
Suite A
Washington, D.C. 20003

In any event, we at Bush-Quayle 92 very much appreciate your continued support of President Bush.

Sincerely,


Bobby R. Burchfield

Attachment



23040935270

Sept. 7, 1942

Dear Mr. Burchfield: -

I have found 2 checks written in June to the "Presidential Victory Committee" for a total of \$150.00

I wrote as you suggested to Mr. Floyd Brown and asked for a refund.

I am 87 years old and find the burden of even opening all the requests by mail, for funds, is getting to me.

I am enclosing the 2 checks I have mentioned and if you want to use them to force a refund - you may keep the money for the Bush Campaign.

I doubt they will pay any attention to my request. If by any chance they do send a refund to me - I will forward same to you, since it was meant for you.

Sincerely,

Eva M. Batekelder (Mrs. A.H.)

P.S. I see these checks were cashed in San Francisco CA

30409352-1



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 24, 1992

Bobby R. Burchfield, General Counsel
Bush-Quayle '92
1030 15th Street, N.W.
Washington, D.C. 20005

RE: MUR 3556
Presidential Victory Committee,
Robert E. Miller, Jr.,
(Citizens for Bush) and
Floyd G. Brown

Dear Mr. Burchfield:

This letter acknowledges receipt on September 17, 1992, of the supplement to the complaint you filed on July 14, 1992, against Presidential Victory Committee, and Robert E. Miller, Jr., as treasurer, Floyd G. Brown and Citizens for Bush. The respondents will be sent a copy of the supplement. You will be notified as soon as the Federal Election Commission takes final action on your complaint.

Sincerely,


Xavier K. McDonnell
Attorney



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 24, 1992

William J. Olson, P.C.
8180 Greensboro Drive
Suite 1070
McLean, Virginia 22102-3823

RE: MUR 3556
Presidential Victory Committee,
Robert E. Miller, Jr.,
(Citizens for Bush) and
Floyd G. Brown

Dear Mr. Olson:

On July 20, 1992, Floyd G. Brown, Presidential Victory Committee, and Robert E. Miller, Jr., as treasurer, and Citizens for Bush ("your clients") were notified that the Federal Election Commission received a complaint from President George Bush and his authorized committees alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. At that time your clients were provided with a copy of the complaint. Your response to the complaint was received on August 4, 1992.

On September 17, 1992, the Commission received additional information from the complainants pertaining to the allegations in the complaint. Enclosed is a copy of this additional information.

If you have any questions, please contact me at
(202) 219-3400.

Sincerely,

Xavier K. McDonnell
Attorney

Enclosure
Supplement to complaint

304023523

WILLIAM J. OLSON, P.C.

ATTORNEYS AT LAW

8180 GREENSBORO DRIVE, SUITE 1070
MCLEAN, VIRGINIA 22102-3823

TELEPHONE (703) 356-5070

FAX (703) 356-5085

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIN COPY ROOM

OCT 27 12 05 PM '92

WILLIAM J. OLSON
(D.C., VA.)
JOHN S. MILES
(D.C., MD., OF COUNSEL)
GILMAN & PANGIA
(OF COUNSEL)

1815 H STREET, N.W.
SUITE 800
WASHINGTON, D.C. 20006-3804
TELEPHONE (202) 223-9066
FAX (202) 331-8986

October 21, 1992

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

Attention: Xavier K. McDonnell, Esquire
Attorney

Re: Presidential Victory Committee
(Citizens for Bush) and
Floyd G. Brown; MUR 3556

92 OCT 27 PM 3:53
FEDERAL ELECTION COMMISSION

Dear Sirs:

By letter dated September 24, 1992, you advised us that, on September 17, 1992, the Federal Election Commission ("FEC") received additional information from the complainants in the above-referenced matter, and you transmitted copies of those materials with your letter.

The materials in question, consisting of a letter from Bush Quayle '92 (Bobby R. Burchfield) to the FEC dated September 16, 1992, and seven pages of exhibits, were submitted as a supplement to the complaint in this matter. This letter is submitted in response to that supplement to the complaint, and as a supplement to our letter setting out the response of our client Presidential Victory Committee ("PVC") dated August 4, 1992.

One of the difficulties with the complaint in this matter is that there has been no showing (and we believe there could be no showing, based upon the facts of which we are aware) that the Respondents violated the law. It was alleged in the complaint, of course, that the Respondents violated the provisions of 11 C.F.R. section 110.11(a)(1)(iii), but there were no facts offered in support of that theory; and the undisputed facts show that the Respondents were at all times in full compliance with those statutory provisions.

The so-called supplement to the Bush-Quayle '92 complaint suffers from the same weakness as the complaint itself. There has been an attempt by Bush-Quayle '92 to put down the Presidential Victory Committee in a way that is highly questionable, and its

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latest effort -- production of a few letters in support of the idea that some donors may have ignored the lawful disclaimers of Presidential Victory Committee's fundraising solicitations and made contributions to Presidential Victory Committee in the mistaken belief that they were donating funds to Bush-Quayle '92 could be said to raise more questions about Bush-Quayle '92 than it does about Presidential Victory Committee.

We would like to emphasize the following points:

1. As previously mentioned in our letter to the FEC of August 4, 1992, in this matter and with all due respect to all concerned, some people misread anything, so the fact that there are some people who say they were mistaken in making donations to Presidential Victory Committee is not particularly astounding. The important fact is that the Respondents were at all times in full compliance with the law.

2. To file additional "evidence," as Bush-Quayle '92 has done, in support of this complaint that donors allegedly have been misled, is a dubious tactic. In the first place, there are very few letters. Since it is evident that Bush-Quayle '92 is digging down deep in its effort to harm the Presidential Victory Committee, it is probably safe to presume that all "evidence" of donors being misled has now been submitted, and it appears that such evidence is sparse indeed. If there were more, it still would not support the allegations of wrongdoing. But the fact remains that there does not appear to be more, casting doubts on the underlying allegation of Bush-Quayle '92 that many people were misled. Moreover, our clients believe not only that Bush-Quayle '92's filing of such additional "evidence" is out of place (theoretically, if this procedure of supplementing a complaint is to be condoned, it might be able to file additional "evidence" again in the future, no matter how sparse such evidence appears to be), but also that such action only sends to highlight the questionable conduct of Bush-Quayle '92 in writing to contributors of Presidential Victory Committee.

3. Not only have the Respondents not violated the law; they have been victimized by the political maneuvering of the complainants, in writing to contributors to the Presidential Victory Committee and, after stirring up suspicion and unrest, filing a complaint with the FEC. We submit that the very communications of Bush-Quayle '92 to contributors to Presidential Victory Committee have caused confusion and misunderstanding in the minds of contributors. Obviously, most contributors to PVC knew that Presidential Victory Committee, and not Bush-Quayle '92, was the recipient of their contributions. Even if some did not know this, it would not have been the result of any impropriety by PVC, which has complied fully with the law. It is likely, however, that some contributors could have been led to seek refunds from PVC because of the communication they received from

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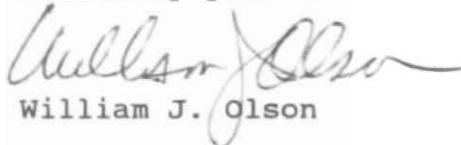
Bush-Quayle '92. The Bush-Quayle '92 letter to PVC contributors very strongly implies not only that PVC is not working for the re-election of President Bush, but also that PVC is engaged in wrongful conduct. The Bush-Quayle '92 letter to PVC contributors, we submit, is very questionable. As we pointed out in our August 4, 1992, letter of response to the complaint, Bush-Quayle '92, presumably using FEC files to obtain the names and addresses of PVC contributors, attempted to persuade those contributors that only the "authorized campaign committee" of its presidential candidate is the proper recipient of their contributions, and that any other contributions would be harmful to the Bush-Quayle re-election effort. Our clients dispute that opinion. The point here is that, in advocating that opinion, Bush-Quayle '92 has gone on the attack against PVC, trying to persuade PVC contributors that PVC has done something wrong. That conduct we submit, goes too far.

4. As we pointed out in our August 4, 1992 letter of response to the complaint, Bush-Quayle '92 has focused on the alleged confusion of contributors and has avoided detailing any wrongful conduct of the Respondents. The "supplemental evidence" it submitted to the FEC with its letter of September 16, 1992, is merely a continuation of that ill-founded attack against the Respondents. There is no evidence of any wrongful conduct on the part of the Respondents, there is simply some evidence about the possible confusion of a few contributors. And it is evident that any such confusion could well have been generated by the activities of Bush-Quayle '92 itself.

5. As we pointed out in our August 4, 1992 letter of response to the complaint, Independent Expenditures, such as those being conducted by the Respondents in 1992, are important to the political process in this country, and the right to conduct Independent Expenditures for or against a candidate or cause is an integral part of protected political speech under the First Amendment. The attack by Bush-Quayle '92 against Presidential Victory Committee is harmful to our political process and is contrary to the ideals upon which the First Amendment is founded.

We sincerely hope that the Commission will see through the latest effort of Bush-Quayle '92 against the Respondents, will recognize that the Respondents have done nothing contrary to the law in conducting their Independent Expenditure in support of the Re-election of President Bush, and will dismiss the complaint.

Sincerely yours,



William J. Olson

WJO:pjm

cc: Presidential Victory Committee

RECEIVED
F.E.C.
SECRETARIAT

93 MAR -9 AM 9:57

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

MUR 3556
DATE COMPLAINT RECEIVED
BY OGC: July 14, 1992
DATE OF NOTIFICATION TO
RESPONDENTS: July 19, 1992
STAFF MEMBER: Xavier K. McDonnell

COMPLAINANTS: George Bush
Bush-Quayle '92 Primary Committee, Inc.
Bush-Quayle '92 Compliance Committee, Inc.

RESPONDENTS: Presidential Victory Committee
and Robert Miller, Treasurer
(Citizens for Bush)
Floyd G. Brown
National Security Political Action Committee
and Elizabeth I. Fediay, as treasurer

RELEVANT STATUTES: 2 U.S.C. § 441d(a)
2 U.S.C. § 432(e)
11 C.F.R. § 110.11(a)
11 C.F.R. § 102.14(a)

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

This matter was generated by a complaint filed by George Bush, Bush-Quayle '92 Primary Committee, Inc., and the Bush-Quayle '92 Compliance Committee, Inc. ("Complainants" or "Bush campaign/Committee") against Floyd G. Brown, the Presidential Victory Committee ("PVC") and Robert Miller, as treasurer, National Security Political Action Committee

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("NSPAC") and Elizabeth I. Fediay, as treasurer ("Respondents").¹ Complainants allege that Respondents have engaged in a pattern of misleading and deceptive fundraising and expenditure activities through the "Citizens for Bush" fundraising project, in violation of the disclaimer provisions. The allegations center primarily around a project fundraising letter. Responses to the complaint and a supplement to the complaint have been received. See Attachments 2-4.

II. FACTUAL AND LEGAL ANALYSIS

A. Applicable Law

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The Federal Election Campaign of of 1971, as amended ("the Act"), and Commission regulations provide that the name of each authorized committee shall include the name of the candidate who authorized such committee. In the case of any committee not authorized, such political committee shall not include the name of any candidate in its name. 2 U.S.C. § 432(e)(4); 11 C.F.R. § 102.14(a). While these provisions prohibit an unauthorized political committee from using a candidate's name in the official title under which it must register with the Commission, during the time at issue independent expenditure groups were permitted to use a candidate's name in the name of a fundraising project. Common

1. The complaint states that James A. Fitch was PVC's treasurer from its inception on February 10 through March 23, 1992, when David Bossie became treasurer. Attachment 1 at page 3. In fact, Robert Miller is PVC's treasurer and has been from the start; Mr. Fitch was the Assistant treasurer, and Mr. Bossie now holds that position. Id. at Exhibits A and B.

Cause v. FEC, 842 F.2d 436 (D.C. Cir. 1988); MURs 2372, 1603 and 1252.²

The Act's disclaimer provision provides that whenever any person makes an expenditure for the purpose of financing communications expressly advocating the election or defeat of a clearly identified candidate, or solicits any contribution through any direct mailing or any other type of general public political advertising, such communication, if not authorized by a candidate, an authorized political committee of a candidate, or its agents, shall clearly state the name of the person who paid for the communication and state that the communication is not authorized by any candidate or candidate's committee. 2 U.S.C. § 441d(a)(3). The Commission's regulation states that disclaimers must be "presented in a clear and conspicuous manner to give the reader ... adequate notice of the identity of persons who paid for" the communication. 11 C.F.R. § 110.11(a)(1).

2. The Commission amended 11 C.F.R. § 102.14(a), so that, effective November 4, 1992, "no unauthorized committee shall include the name of any candidate in its name. For purposes of this paragraph, 'name' includes any name under which a committee conducts activities, such as solicitations or other communications, including a special project name or other designation." See 57 Fed. Reg. 31424 (July 15, 1992) (to be codified at 11 C.F.R. § 102.14(a)). The amended regulation, however, was not in effect at the time the communications at issue were distributed. Thus, for purposes of this matter, an unauthorized committee is prohibited from using a candidate's name in its official or registered name, but not in its project name.

We note that the opening paragraph of the complaint alleges violations of 2 U.S.C. § 432(e) and 11 C.F.R. § 102.14(a). However, the complainants do not again allege any violation of those provisions within the nine page complaint, and in the violations section of the complaint they allege only a violation of 11 C.F.R. § 110.11(a)(1)(iii).

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B. Background

Respondent PVC is an unauthorized political committee registered with the Commission as an entity which supports/opposes more than one Federal candidate. During the 1992 election cycle, PVC, an independent expenditure group, operated a project with the name "Citizens for Bush." Attachment 1 at page 1. Floyd Brown, a named respondent in this matter, is identified in PVC's fundraising materials as the "National Chairman" of Citizens for Bush, and Brown indicates he founded the project. Id. at Exhibits I and U.

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During the 1988 election cycle, NSPAC, another independent expenditure group, had a project called "Americans for Bush." NSPAC and its treasurer, Elizabeth Fediay, were respondents in MUR 2638, a matter settled through a post probable cause conciliation agreement which included an admission of a violation of Section 441d(a) by NSPAC for failing to place a complete disclaimer on approximately 170,000 Americans for Bush posters/yard signs. See MUR 2638. Floyd Brown was a NSPAC consultant during 1988, and provided advice on political strategy for the Americans for Bush fundraising project. Attachment 3 at page 2. However, Floyd Brown was not a respondent in MUR 2638, and it appears his consulting relationship with NSPAC ceased after the 1988 campaign. Attachment 3 at page 2.³

3. NSPAC was also a respondent in MUR 3069, a complaint-generated matter which alleged that NSPAC's expenditures were coordinated with the Bush campaign for its "Willie Horton" television advertisements and theme in 1988. In response to the complaint in MUR 3069, NSPAC provided an affidavit from Brown which indicated that he was a NSPAC consultant involved in the

According to the Complainants, Mr. Brown has "publicly touted" his former relationship with NSPAC during two press conferences and on a videotape distributed to potential contributors. Attachment 1 at pages 2-3. The complaint does not contain any evidence pertaining to the alleged press statements made by Brown about his relationship with NSPAC, but includes a copy of the PVC videotape in which Mr. Brown solicits funds for the Citizens for Bush project.⁴

C. Analysis

Much of the complaint is a detailed description of the allegedly misleading activities of the "Citizens for Bush" project, and of the actions taken by Bush-Quayle '92 to dissociate themselves from the project. Beneath the lengthy discussion, however, there are essentially three interrelated allegations, none of which has merit. The Complainants allege that PVC's disclaimers are inadequate, that PVC mislead contributors about the use of its contributions, and that through PVC's activities

(Footnote 3 continued from previous page)
Willie Horton ad.

4. In the videotape, Mr. Brown indicates that he was the "political director" of NSPAC in 1988, and the tape contains footage from three of NSPAC's 1988 advertisements. The video also contains a portion of two additional ads, one in support of the confirmation of Supreme Court Justice Clarence Thomas, and the other advocating the defeat of Louisiana Gubernatorial candidate David Duke. The footage from these ads appears to be displayed as evidence of Mr. Brown's past political successes, as an incentive to encourage viewers to contribute to the Citizens for Bush project. The videotape contains a disclaimer which states that PVC paid for it, and that it was not authorized by any candidate or candidate's committee. In her response, NSPAC's treasurer Elizabeth Fediay contends that Brown was not authorized to use the portions of NSPAC's ads. Attachment 3 at page 1.

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described above, Floyd Brown violated the conciliation agreement in MUR 2638.

We first address the allegation that the disclaimer on a June 25, 1992, Citizens for Bush fundraising letter is "ambiguous and clearly inadequate to satisfy the terms and objectives of 11 C.F.R. § 110.11(a)(1)(iii)." The first page of the fundraising letter which the Bush campaign alleges violates the disclaimer requirement contains the heading: "CITIZENS FOR BUSH." Just below the heading, in smaller letters, it states: "Paid for By Presidential Victory Committee." The bottom of the first page of the June 25, 1992 solicitation contains the following disclaimer:

Paid for by the Presidential Victory Committee, and not authorized by any candidate or candidate's committee. Contributions or gifts to the Presidential Victory Committee are not tax deductible as charitable contributions for federal income tax purposes.

Attachment 1 at Exhibit J. An identical disclaimer also appears on the reply card portion of the last page of the mailing.⁵

Complainants offer what they contend is "strong and

5. In addition to the fundraising letter discussed above in the text, the attached to the complaint are two copies of an undated fundraising letter with disclaimers which the Complainants acknowledge are sufficient. Attachment 1 at Exhibits I and U. The undated letter contains the heading: "Citizens for Bush: A project of Presidential Victory Committee." The letter states on the first page, as well as on the reply card: "Paid for by Presidential Victory Committee and not authorized by any candidate or candidate's committee," and "Citizens for Bush is a project of Presidential Victory Committee and is an Independent Expenditure effort not affiliated in any way with Bush-Quayle '92." Attachment 1 at Exhibits I and U. According to the Complainants, this more detailed disclaimer was used by PVC in response to their written demand, dated March 9, 1992, but that PVC subsequently reverted back to using the disclaimer contained on the June 25, 1992 letter. Attachment 1 at pages 3 and 4 and at Exhibit C.

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incontrovertible evidence" that PVC's disclaimer is inadequate: letters from 13 contributors to PVC's Citizens for Bush project who indicate they were lead to believe that PVC was authorized by the Bush campaign.⁶ Attachment 1 at pages 7-8; Exhibit N and Attachment 4 at pages 3-9. Complainants appear to be asserting that PVC's use of the Citizens for Bush project name had the effect of frustrating "the terms and objectives" of the disclaimer regulation. Attachment 1 at pages 7-8.

It is clear that the disclaimers provided on this solicitation letter meet the requirements of the Act and Commission regulations. The disclaimers indicate who paid for the communication and that it is not authorized by any candidate or candidate's committee. See 2 U.S.C. § 441d(a)(3); 11 C.F.R. § 110.11(a)(1)(iii). Although there is evidence that some contributors may have been confused by the Citizens For Bush fundraising tactics, PVC was permitted to use a candidate's name in its project name prior to November 4, 1992. Common Cause v. FEC, 842 F.2d 436 (D.C. Cir. 1988); Cf. 57 Fed. Reg. 31424

6. The complaint indicates that the Bush campaign obtained a listing of PVC contributors, sent letters to 364 of those contributors to inform them that PVC was not authorized or affiliated with President Bush or his committees, and that if they had contributed to PVC under the "false impression" that it was authorized by President Bush, they could ask for a refund. Attachment 1 at Exhibit M; See AO 1984-2. The Bush campaign attached to its letter to PVC contributors a photocopy of its March 9, 1992 correspondence to PVC in which the Bush campaign threatened to initiate proceedings with the FEC if PVC did not cease all such activities. Attachment 1 at Exhibit C. It appears that the letters from the 13 PVC contributors were in response to the Bush campaign's letter to the 364 contributors.

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(1992)(to be codified at 11 C.F.R. § 102.14(a)).⁷

Complainants' allegation about PVC's misleading contributors is also without merit. First of all, the complaint does not indicate what provisions of the Act or regulations have been violated by what are described as "intentionally deceptive activities." Attachment 1 at page 8. Moreover, as noted above, PVC was permitted during the time in question to use the candidate's name in its project name.

Complainants apparently base their claim on the fact that funds raised were not used exclusively to support the Bush campaign, since PVC contributed to one Senatorial and six Congressional candidates. See Attachment 1 at page 7. As evidence that contributors were misled about the use of funds, Complainants rely on a statement allegedly appearing in an undated fundraising letter attached to the complaint which they quote as saying: "Every dollar you contribute will help Citizens for Bush fight to keep George Bush in the White House." Attachment 1 at Exhibits I and U. However, the copies of the undated fundraising letter attached to the complaint do not contain that statement, although they do state that Citizens for Bush "has only one goal:

7. The Bush campaign wrote two letters to Floyd Brown in an apparent attempt to get PVC to stop using the project name and to express opposition to PVC's activities. In the second of the two letters, dated June 9, 1992, counsel for the Bush campaign stated that several "sources reported" that PVC planned to run ads containing allegations about Bill Clinton and Gennifer Flowers and to operate a "pay-per-call telephone message line." Attachment 1 at Exhibit S. Counsel stated in the letter that it is the "policy" of the Bush campaign to keep "tabloid sleaze out of the election campaign," that neither President Bush nor his campaign staff condone such actions in any way, and he "strongly urged" PVC "to cease these activities." Id.

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To help make sure George Bush is re-elected" in November. Attachment 1 at page 7 and Exhibits I and U; Attachment 2 at pages 4 and 13.⁸ On the other hand, the aforementioned fundraising letter of June 25, 1992, which Complainants assert violates the disclaimer provision actually states in three separate places that PVC supports "the election of Conservatives to Congress" as well as President Bush. Attachment 1 at Exhibit J, pages 3, 4 and 5.

Complainants also assert that, despite the fact that PVC had raised close to \$680,000 by the end of May of 1992, the independent expenditure group had yet to run a single advertisement, and was simply sustaining its principals and its direct mail efforts. Attachment 1 at page 7. However, in MUR 2638 the Commission rejected the assertion that payments for direct mailings did not qualify as independent expenditures. In addition, there is no evidence that any of the independent expenditures made by PVC were not accurately and fully reported in accordance with Sections 434(b) and (c).⁹

Finally, Complainants argue that Mr. Brown is bound by the

8. In any event, we note that the undated letter explicitly indicates that Citizens for Bush is a fundraising project and is not authorized by President Bush or his committee. See supra footnote 5.

9. The allegations in this matter are similar to those made by the Bush Committee against NSPAC in MUR 2638, in which the Bush Committee argued that "Americans for Bush" had "misrepresented itself to the public as an authorized committee of George Bush through its special project," that contributors were misinformed about the project's affiliation with Bush, that its expenditures were not made on behalf of Bush, but for its own fundraising purposes. In MUR 2638, the Commission found no reason to believe that respondents violated 2 U.S.C. § 434(b)(6)(B)(iii), rejecting the complainants' assertion that NSPAC's payments for direct mailings did not qualify as independent expenditures.

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terms of the conciliation agreement in MUR 2638 and that because PVC's solicitation letter lacks adequate disclaimers, he has violated the terms of that agreement. It does not appear that either PVC or Mr. Brown has violated the disclaimer requirements of the Act or Commission regulations based on this complaint. Therefore, it is not necessary to decide if Mr. Brown was in any way bound by the conciliation agreement in MUR 2638.¹⁰

For the foregoing reasons, the Office of the General Counsel recommends that the Commission find no reason to believe that Presidential Victory Committee, Robert Miller, as treasurer (Citizens for Bush), Floyd G. Brown, National Security Political Action Committee, and Elizabeth I. Fediay, as treasurer violated any provision of the Act or Commission regulations based upon the allegations in this complaint. This Office also recommends that the Commission deny Complainants' request to impose a civil penalty on Respondents and to initiate proceedings to enforce the Conciliation Agreement in MUR 2638.

III. RECOMMENDATIONS

1. Find no reason to believe Presidential Victory Committee, Robert Miller, as treasurer (Citizens for Bush), Floyd G. Brown, National Security Political Action Committee, and Elizabeth I. Fediay, as treasurer, violated any provision of the Act or Commission regulations based on the complaint in MUR 3556.

10. NSPAC's treasurer denies that her political committee is affiliated in any way with PVC or Brown and she notes that NSPAC is \$1.5 million in debt and ceased all activity in March of 1991. Attachment 3 at pages 1 and 2. We note, however, that PVC made \$1,000 in independent expenditures on behalf of Bush to Ms. Fediay on April 23, 1992. The payment was for a "list rental fee" see Attachment 6, which suggests that PVC may have solicited some of NSPAC's former contributors.

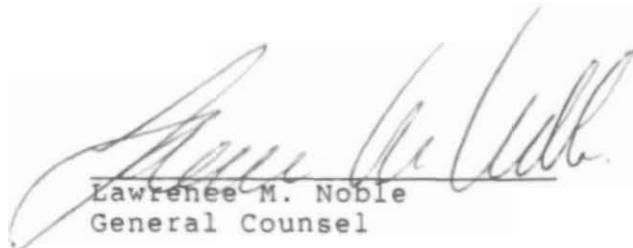
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2. Deny Complainants' request to impose a civil penalty upon respondents and to initiate a proceeding to enforce the Conciliation Agreement in MUR 2638.

3. Approve the appropriate letters.

4. Close the file.

3/8/93
Date


Lawrence M. Noble
General Counsel

Attachments

1. Complaint
2. PVC's response
3. NSPAC's response
4. Supplement
5. Response to Supplement
6. PVC disclosure report

23040935247



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20461

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/DONNA ROACH *DR*
COMMISSION SECRETARY

DATE: MARCH 12, 1993

SUBJECT: MUR 3556 - FIRST GENERAL COUNSEL'S REPORT
DATED MARCH 8, 1993.

The above-captioned document was circulated to the
Commission on TUESDAY, MARCH 9, 1993 at 4:00 P.M.

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

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Potter	XXXX
Commissioner Thomas	_____

This matter will be placed on the meeting agenda
for TUESDAY, MARCH 23, 1993

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

33040935248

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 3556
Presidential Victory Committee)
and Robert Miller, Treasurer)
(Citizens for Bush);)
Floyd G. Brown;)
National Security Political Action)
Committee and Elizabeth I. Fediay,)
as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on March 23, 1993, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 3556:

1. Find no reason to believe Presidential Victory Committee, Robert Miller, as treasurer (Citizens for Bush), Floyd G. Brown, National Security Political Action Committee, and Elizabeth I. Fediay, as treasurer, violated any provision of the Act or Commission regulations based on the complaint in MUR 3556.
2. Deny Complainants' request to impose a civil penalty upon respondents and to initiate a proceeding to enforce the Conciliation Agreement in MUR 2638.

(continued)

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3. Approve the appropriate letters as recommended in the General Counsel's report dated March 8, 1993.
4. Close the file.

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

Attest:

3-24-93
Date

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

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 25, 1993

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Bobby R. Burchfield, General Counsel
Bush-Quayle '92
1030 15th Street, N.W.
Washington, D.C. 20005

RE: MUR 3556
Presidential Victory Committee
and David Bossie, as treasurer
(Citizens for Bush)

Floyd Brown

National Security Political
Action Committee and
Elizabeth I. Fediay, as treasurer

Dear Mr. Burchfield:

On March 23, 1993, the Federal Election Commission reviewed the allegations of your complaint dated July 14, 1992, and found that on the basis of the information provided in your complaint, and information provided by the above-named respondents, there is no reason to believe that they violated any provision of the Federal Election Campaign Act of 1971, as amended, (the "Act") or Commission regulations based on the allegations in your complaint. By same date, the Commission denied your request to impose a civil penalty on the respondents and denied your request to initiate a proceeding to enforce the Conciliation Agreement in MUR 2638. Accordingly, the Commission closed the file in this matter on March 23, 1993. Attached for your information is the First General Counsel's Report in this matter.

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Bobby R. Burchfield, General Counsel
Page 2

The Act allows complainants 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
First General Counsel's Report

23040935232



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 25, 1993

William J. Olson, Esquire
John S. Miles, Esquire
William J. Olson, P.C.
8180 Greensboro Drive
Suite 1070
McLean, Virginia 22102-3823

RE: MUR 3556
Presidential Victory Committee and
David Bossie, as treasurer
(Citizens for Bush)

Floyd Brown

Dear Mr. Olson:

On July 19, 1992, the Federal Election Commission notified Presidential Victory Committee, and David Bossie, as treasurer, (Citizens for Bush) and Floyd Brown ("your clients") of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act").

On March 23, 1993, the Commission found, on the basis of the information in the complaint and information provided by your clients, that there is no reason to believe they violated any provision of the Act or Commission regulations. Accordingly, the Commission closed the file in this matter. Attached for your information is a copy of the First General Counsel's Report in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal

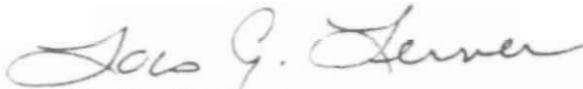
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William J. Olson, Esquire
John S. Miles, Esquire
Page 2

materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

Sincerely,

Lawrence M. Noble
General Counsel



BY: Lois G. Lerner
Associate General Counsel

Enclosure
First General Counsel's Report

23340935204



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 25, 1993

Elizabeth I. Fediay, Treasurer
National Security Political
Action Committee
3200 Morrison Street, N.W.
Washington, D.C. 20015

CLOSED

RE: MUR 3556

Dear Ms. Fediay:

On July 19, 1992, the Federal Election Commission notified National Security Political Action Committee (the "Committee") and you, as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act").

On March 23, 1993, 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 Committee or you violated any provision of the Act or Commission regulations on the basis of the complaint in MUR 3556. Accordingly, the Commission closed the file in this matter. Attached for your information is a copy of the First General Counsel's Report.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

Sincerely,

Lawrence M. Noble
General Counsel

Lois G. Lerner
BY: LOIS G. Lerner
Associate General Counsel

Enclosure
First General Counsel's Report

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FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

THIS IS THE END OF MUR # 3556

DATE FILMED 4/2/93 CAMERA NO. 2

CAMERAMAN E.E.S.

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