



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3575

DATE FILMED 8-30-97 CAMERA NO. 2

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RECEIVED
FEDERAL ELECTION
COMMISSION
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913 273-0338
Aug 10 10 03 AM '92

FRED W. PHELPS

3701 W. 12TH - P. O. BOX 1886 - TOPEKA, KS 66601

July 27, 1992

BEFORE THE FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
999 "E" STREET NW, WASHINGTON, D.C. 20463

MUR 3575

COMPLAINT

State of Kansas, County of Shawnee, SS: The undersigned, Fred Phelps, of lawful age, and being first duly sworn upon my oath, depose and say:

1. I am a duly registered, filed, qualified, and active candidate for nomination to the U.S. Senate on the Democratic ticket for the August 4, 1992 primary in Kansas, and my only Democratic opponent in said primary is Gloria O'Dell. The state and national Democratic Party leaders are illegally promoting O'Dell's candidacy over mine because O'Dell is a lesbian promoting the homosexual agenda which I oppose.

2. On or about July 1, 1992, over my timely objection as discriminatorily denying equal treatment to my candidacy, the Kansas Democratic Party made a contribution in kind to O'Dell in the form of a mailing piece touting her candidacy in opposition to my candidacy to some 12,000 Kansas Democrats, and said mailing had a reasonable value in excess of \$7,500 which O'Dell illegally failed, neglected, and refused to include as a contribution in kind for the period ending July 15, 1992 in her report filed with the FEC as required by law on or about July 21, 1992.

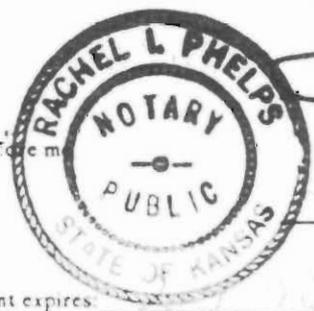
3. On July 13, 1992, over my timely objection as discriminatorily denying equal treatment to my candidacy, the National Democratic Party made a contribution in kind to O'Dell in the form of a nationally televised 3-minute political campaign promotional spot touting her candidacy in opposition to my candidacy and displaying O'Dell's toll-free fundraising number (1-800-GLORIA-3/1-800-456-7423) urging the TV viewing audience to support and vote for O'Dell as against others, and said 3-minute spot had a reasonable value in excess of \$50,000 which O'Dell illegally failed, neglected and refused to include as a contribution in kind for the period ending July 15, 1992 in her said report filed on or about July 21, 1992.

4. I have made timely objections to and demands for rectification of the above-described illegal activities to O'Dell, Ron Brown, Bill Clinton, and Al Gore, to no avail. I have documentation in support of this complaint which I will make available to the FEC upon request. So help me God. Further affiant saith not.

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92 AUG 10 PM 3:17

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL



Fred Phelps
Fred Phelps

Subscribed and sworn to before me this 27th day of July, 1992.

Notary Public

My commission/appointment expires:



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 13, 1992

Mr. Fred Phelps
3701 W. 12th
P.O. Box 1886
Topeka, Kansas 66601

RE: MUR 3575

Dear Mr. Phelps:

This letter acknowledges receipt on August 10, 1992, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Gloria O'Dell for U.S. Senate, and Robert K. Tracy, as treasurer, Kansas Democratic State Committee, and Randall K. Rathbun, as treasurer, Democratic National Committee and Robert T. Matsui, 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 3575. 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,

Teresa A. Hennessy
Assistant General Counsel

Enclosure
Procedures

94043562410



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

August 13, 1992

Gloria O'Dell for U.S. Senate
Robert K. Tracy, Treasurer
P.O. Box 2393
Topeka, Kansas 66601

RE: MUR 3575

Dear Mr. Tracy:

The Federal Election Commission received a complaint which indicates that Gloria O'Dell for U.S. Senate ("Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3575. 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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Gloria O'Dell for U.S. Senate
Robert K. Tracy, Treasurer
Page 2

If you have any questions, please contact Richard M. Denholm II, 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,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

Enclosures

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

24043562412



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 13, 1992

Kansas Democratic State Committee
Randall K. Rathbun, Treasurer
P.O. Box 1914
Topeka, Kansas 66601

RE: MUR 3575

Dear Mr. Rathbun:

The Federal Election Commission received a complaint which indicates that the Kansas Democratic State Committee ("Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3575. 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.

24043562413

Kansas Democratic State Committee
Randall K. Rathbun, Treasurer
Page 2

If you have any questions, please contact Richard M. Denholm II, 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,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

Enclosures

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

94043562414



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 13, 1992

Democratic National Committee
Robert T. Matsui, Treasurer
430 S. Capitol Street, S.E.
Washington, D.C. 20003

RE: MUR 3575

Dear Mr. Matsui:

The Federal Election Commission received a complaint which indicates that the Democratic National Committee ("Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3575. 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.

24043562415

Democratic National Committee
Robert T. Matsui, Treasurer
Page 2

If you have any questions, please contact Richard M. Denholm II, 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,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

Enclosures

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

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060 6430

Jo Ann Van Meter
Attorney at Law
525 S.W. Topeka Boulevard
Topeka, Kansas 66603

RECEIVED
FEDERAL ELECTION
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913-233-8080
August 28, 1992

Richard M. Denholm II
Assistant General Counsel
Federal Election Commission
Washington, D.C. 40263

RECEIVED
FEDERAL ELECTION
COMMISSION
92 SEP 15 AM 10:50

Faxed to Federal Election Commission on August 28,
1992 at number 202 219 3880

Federal Expressed to Federal Election Commission on
August 28, 1992

RE: MUR 3575

Dear Mr. Denholm:

Enclosed please find the original and one copy of
the Answer to the Complaint and the Statement of
Designation of Counsel. Please return the date stamped
copy of each to me in the enclosed stamped, self
addressed envelope.

Thank you for your assistance in this matter.

Sincerely,

Jo Ann Van Meter

Encl: 5
cc: Gloria O'Dell
Robert Tracy

94043562417

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3575

NAME OF COUNSEL: Jo Ann Van Meter

ADDRESS: 525 S.W. Topeka Blvd.
Topeka, KS 66603

TELEPHONE: 913 233 8080

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.

Apr 27, 1992
Date

Robert Tracy
Signature

RESPONDENT'S NAME: Gloria O'Dell for U.S. Senate

ADDRESS: Robert Tracy, Treasurer
730 Kansas Avenue
Topeka, Kansas 66603

HOME PHONE: 913 842 0128

BUSINESS PHONE: 913 357 1777

94043562418

BEFORE THE FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
999 "E" Street
Washington, D.C. 20463

In the Matter of GLORIA O'DELL FOR
U.S. SENATE, Robert Tracy, Treasurer.

MUV 3575

ANSWER TO COMPLAINT

COMES NOW the respondent, Gloria O'Dell for U.S. Senate, by and through Robert Tracy, treasurer, and specifically denies each and every allegation set forth in the petition.

1. Gloria o'Dell is the Democratic candidate for the United States Senate from the State of Kansas. The principal campaign committee designated and authorized by the candidate is Gloria O'Dell for U.S. Senate, Robert Tracy, treasurer, 730 Kansas Avenue, Topeka, Kansas 66603.

2. It is specifically denied that the Kansas Democratic Party made a contribution in kind to Gloria O'Dell for U.S. Senate on or about July 1, 1992.

3. It is specifically denied that Gloria O'Dell for U.S. Senate illegally failed, neglected, and refused to report a contribution in kind by the Kansas Democratic Party in its report to the Federal Election Commission for the reporting period which ended July 15, 1992.

4. The mailing piece to which the complainant refers in allegation two (2) of his petition is apparently the Demogram, a quarterly news magazine

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published by the Kansas Democratic Party.

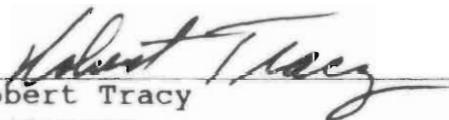
5. It is specifically denied that the National Democratic Party made a contribution in kind to Gloria O'Dell for U.S. Senate on July 13, 1992.

6. It is specifically denied that Gloria O'Dell for U.S. Senate illegally failed, neglected and refused to report a contribution in kind by the National Democratic Party in its report to the Federal Election Commission for the reporting period which ended July 15, 1992.

7. The National Democratic Party selected Gloria O'Dell, among many other candidates and party notables, to address the delegates at the Democratic National Convention.

8. The complaint filed by Fred Phelps with the Federal Election Commission on August 10, 1992, is frivolous, without a meritorious claim in either fact or law.

WHEREFORE, Gloria O'Dell for U.S. Senate prays the Federal Election Commission to dismiss the complaint as frivolous and to assess against Fred Phelps the expense of defending against this complaint.


Robert Tracy
Treasurer
GLORIA O'DELL FOR U.S. SENATE
730 Kansas Avenue
Topeka, Kansas 66603

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VERIFICATION

I, Robert Tracy, treasurer for Gloria O'Dell for U.S. Senate, under oath, state that I have read the answer and know the statements in the answer to be true and accurate.

Robert Tracy
Robert Tracy
Treasurer
Gloria O'Dell for U.S. Senate

STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

Subscribed and sworn to before me, the undersigned authority, on the 27th day of August, 1992.



Nadine Fleer
Notary Public
appointment expires: Aug 8, 1994

Jo Ann Van Meter
Jo Ann Van Meter #11221
Attorney at Law
525 S.W. Topeka Boulevard
Topeka, Kansas 66603

94043562421



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 17, 1992

Ms. Jo Ann Van Meter
525 S.W. Topeka Blvd.
Topeka, Kansas 66603

MUR 3575

Dear Ms. Van Meter:

Enclosed please find the date stamped copy of the Answer to the Complaint you requested. If you have any questions, please contact me at (202) 219-3690.

Sincerely,

A handwritten signature in cursive script that reads "Richard M. Denholm II".

Richard M. Denholm II
Attorney

Enclosure

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RECEIVED
FEDERAL ELECTION
COMMISSION

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John T. Bird
State Chairman

Executive Committee

- Rosetta Ditson
- Charlotte Potter
- Randy Rathbun
- Ron Svary
- Betty Ratts
- Rep. Anthony Hershey
- John Ann Clem
- Michael Peterson
- Jean Stover
- Tino Montaño

- Pat Lehman
- Stanley Fowler
- Bobby Seger
- Governor Joan Finney
- Treas. Sally Thompson
- Speaker Marvin Burks
- Rep. Tom Sawyer
- Senator Gerald Karr
- Senator Paul Feleciano
- Shirley Jacques
- Dennis Langley
- Dr. Gilbert Parks, M.D.
- Erin Pereira
- Inese Younkman
- Shirley Zischek
- Richard Wirtz

Ex-Officio • Past Chairs

- Marvin Hander
- Jack Glaves
- Maurice Martin
- Thomas J. Conzatti
- Norbert R. Dreding
- Robert L. Driscoll
- Jan Myers
- Larry Bengtson
- Robert E. Tilton
- Pat Lehman
- James W. Parrish

Executive Director
Robert G. Swanson

August 24, 1992

Teresa A. Hennessy
Assistant General Counsel
Federal Election Commission
Washington D.C. 20463

Teresa A. Hennessy:

This letter is to acknowledge receipt of your letter received in my office August 19th. The complaint you received which was filed against the Kansas Democratic Party is being processed and handled by counsel.

Please be advised that the information you requested will be promptly forwarded to you.

If we need to provide further information or if you have questions, please call me or Robert G. Swanson, State Party Executive Director, at 913-234-0425.

Sincerely,

Randall K. Rathbun
Randall K. Rathbun
State Party Treasurer

cc: John T. Bird, State Chair
Robert G. Swanson, Executive Director

92 SEP -1 AM 10:33

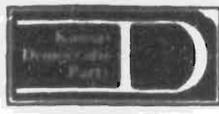
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COMMISSION

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**BEFORE THE FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
999 "E" Street
Washington D.C. 20463**

John T. Bird
State Chairman

In the Matter of THE KANSAS DEMOCRATIC STATE COMMITTEE - MUV 3575
Robert G. Swanson, Executive Director

Executive Committee
Rosetta Dotson
Charlene Potter
Randy Rathbun
Ron Swart
Betsy Rains
Rep. Anthony Hendale
Julia Ann Glen
Michael Peterson
Jean Stover

ANSWER TO COMPLAINT:

COMES NOW the respondent, THE KANSAS DEMOCRATIC STATE COMMITTEE, by and through Robert G. Swanson, Executive Director, and specifically denies each allegation set forth in the Petition of August 10, 1992.

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FEDERAL ELECTION COMMISSION

- 1) The Kansas Democratic State Committee is the recognized and official organization of registered Democrats in the state of Kansas; Randall K. Rathbun, Treasurer; and is a member in good standing with the Democratic National Committee.
- 2) It is specifically denied that the Kansas Democratic State Committee illegally promoted Gloria O'Dell's candidacy for U.S. Senate because O'Dell is a lesbian promoting the homosexual agenda which Fred Phelps opposes.
- 3) It is specifically denied that the Kansas Democratic State Committee made a contribution in kind to the Gloria O'Dell for U.S. Senate Campaign on or about July 1, 1992.
- 4) The complaint filed by Fred Phelps with the Federal Election Commission on August 10, 1992 is frivolous, without merit in either fact or law.

WHEREFORE, The Kansas Democratic State Committee requests that the Federal Election Commission dismiss the complaint as frivolous and to assess against Fred Phelps the expense of defending against this complaint.

Robert G. Swanson
Executive Director
Kansas Democratic Party
Suite 305 Jayhawk Towers / 7th and Jackson
Topeka, KS 66603

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Ex-Officio • Past Chairs
Marvin Harder
Jack Graves
Maurice Martin
Thomas J. Concoran
Nobert R. Dreiling
Robert L. Bruck
Jan Myers
Larry Bengtson
Robert E. Tilton
Pat Lehman
James W. Parrish
Executive Director
Robert G. Swanson





John T. Bird
State Chairman

Executive Committee

- Rosetta Dotsen
- Charlene Potter
- Randy Rathbun
- Ron Svary
- Betsy Ratts
- Rep. Anthony Hendley
- Julia Ann Clem
- Michael Peterson
- Jean Stover
- Tino Montaldo
- Pat Lehman
- Stanley Fowler
- Bobby Seger
- Governor Joan Finney
- Tres. Sally Thompson
- Speaker Marvin Birks
- Rep. Tom Sawyer
- Senator Gerald Katz
- Senator Paul Folegiano
- Shirley Jacques
- Dennis Langley
- Dr. Gilbert Parks, M.D.
- Eva Pereira
- Irene Younkman
- Sheila Zuscak
- Richard Wurtz

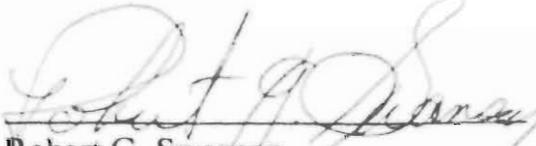
Ex-Officio • Past Chairs

- Marvin Handler
- Jack Claves
- Maurice Martin
- Thomas J. Concoran
- Norbert R. Dreiling
- Robert L. Bruck
- Jan Myers
- Larry Bengtson
- Robert E. Tilton
- Pat Lehman
- James W. Parrish

Executive Director
Robert G. Swanson

VERIFICATION:

I, Robert G. Swanson, Executive Director of the Kansas Democratic Committee, under oath, state that I have read the answer and know the statements in the answer to be true and accurate.


 Robert G. Swanson
 Executive Director

Subscribed and sworn to before me, the undersigned authority, on 2nd day of September 1992.


 NOTARY PUBLIC



RECEIVED
 KANSAS DEMOCRATIC PARTY
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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

October 16, 1992

Mr. Robert T. Matsui, Treasurer
Democratic National Committee
430 S. Capitol Street, S.E.
Washington, D.C. 20003

RE: MUR 3575

Dear Mr. Matsui:

In a letter dated August 13, 1992, you were notified that the Federal Election Commission received a complaint which indicates that the Democratic National Committee and you, as treasurer, violated the Federal Election Campaign Act of 1971, as amended.

Under the Act, and Commission regulations, you have an opportunity to demonstrate that no action should be taken against you. A review of our files indicates that to date you have not responded. Unless we receive a response from you within 10 days, this matter may proceed to the next stage of the enforcement process.

Should you have any questions, please contact me at (202) 219-3690.

Sincerely,

A handwritten signature in cursive script, appearing to read "Richard M. Denholm II".

Richard M. Denholm II
Attorney

24047562426

OGC 7097



Democratic National Committee

October 23, 1992

Richard M. Denholm II
Attorney
Federal Election Commission
430 South Capitol Street, S.E.
Washington, D.C. 20003

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RE: MUR 3575

Dear Mr. Denholm:

The DNC is taking this opportunity to respond to the complaint filed against it by Fred W. Phelps on August 10, 1992. I apologize on behalf of the DNC for our tardiness in submitting our response. Unfortunately, the initial notification was misplaced.

Thank you for allowing the DNC to file this response with the FEC.

Sincerely,

Eric D. London
Assistant Counsel

24043562427

BEFORE THE FEDERAL ELECTION COMMISSION
OF THE UNITED STATES OF AMERICA

Response to Complaint Filed in MUR 3575

Respondents: Robert T. Matsui, Treasurer,
DNC Services Corporation/
Democratic National Committee ("DNC")

Complainant: Fred W. Phelps

92 OCT 23 PM 4:51

INTRODUCTION

Pursuant to 2 U.S.C. §437g(a)(1), Robert T. Matsui, Treasurer, and DNC Services Corporation/Democratic National Committee ("DNC") file this response with the Federal Election Commission ("FEC") to the complaint filed against respondents by Fred W. Phelps on August 10, 1992. In this complaint, Mr. Phelps alleged that the National Democratic Party made a contribution in-kind valued in excess of \$50,000 to Gloria O'Dell, the Democratic nominee for U.S. Senate in Kansas. Although not stated in the said complaint, this contribution, if made, would violate the contribution limits contained in 11 C.F.R. 110.7 (2 U.S.C. 441a(d)).

In its response, the DNC argues that no such contribution was made to Gloria O'Dell's candidacy; indeed, no contribution of any kind was made to her candidacy by the DNC.

DISCUSSION

In his complaint, Mr. Phelps alleges that on July 13, 1992 "the National Democratic Party made a contribution in kind to O'Dell in the form of a nationally televised 3-minute political campaign promotional spot touting her candidacy" in opposition to Mr. Phelps', and "displaying O'Dell's toll-free fundraising number (1-800-GLORIA-3/1-800-456-7423) urging the TV viewing audience to support and vote for O'Dell as against others."

2 4 0 4 3 5 6 2 4 2 8

The DNC made no contribution to Ms. O'Dell on the date alleged by Mr. Phelps. The DNC made no direct contributions in July 1992 to any candidates for federal office. See exhibit A (Detailed Summary Page of Receipts and Disbursements, August 1992 FEC report (July 1-July 31, 1992)). In addition, the DNC did not make any coordinated party expenditure on behalf of any U.S. Senate candidate in July 1992. See exhibits A and B (Schedule F, Itemized Coordinated Expenditures Made By Political Party Committees, August 1992 FEC report (July 1-31, 1992)).

Finally, the DNC staff member who approves all disbursements made by the committee attests that the DNC has made no expenditure for the "nationally televised 3-minute political campaign promotional spot," described in Mr. Phelps' complaint. Mr. Foucart also attests to the fact that the DNC made no contribution of any sort to Ms. O'Dell's campaign. See exhibit C, affidavit by Brian Foucart, DNC Deputy Chief of Staff.

CONCLUSION

The DNC rejects the charges leveled against it in the complaint filed by Mr. Phelps. The allegation made in his complaint concerning the DNC is without any factual basis. Therefore, as the DNC did not violate any provision of the Federal Election Campaign Act of 1971, as amended, the DNC asks that the FEC dismiss this complaint.

Respectfully submitted,


Eric London
Assistant Counsel

Sworn to and subscribed before me this 23rd day of October, 1992.


Notary Public

24043562429

**DETAILED SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS
PAGE 2, FEC FORM 3X**

EXHIBIT A

(revised 11/91)

NAME OF COMMITTEE DNC Serv. Corp./Democratic Nat'l Cttee		REPORT COVERING PERIOD FROM 7/1/92 TO 7/31/92	
		COLUMN A Total This Period	COLUMN B Calendar Year
I. Receipts			
11. Contributions (other than loans) From:			
a. Individual Persons Other Than Political Committees			
i. Itemized (use Schedule A)		6,209,324.77	8,877,771.34
ii. Unitemized		1,536,074.46	5,346,028.46
iii. Total	(add i and ii) >	7,745,399.23	14,223,799.80
b. Political Party Committees		-0-	-0-
c. Other Political Committees (such as PACs)		306,975.00	965,625.00
d. Total Contributions	(add a iii, b and c) >	8,052,374.23	15,189,424.80
12. Transfers From Affiliated/Other Party Committees		35,000.00	116,650.00
13. All Loans Received			
14. Loan Repayments Received			
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.)		275,001.98	332,327.35
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees			
17. Other Federal Receipts (Dividends, Interest, etc.)		945.52	9,409.45
18. Transfers from Nonfederal Account for Joint Activity		816,655.36	2,668,584.28
19. Total Receipts	(add 11d, 12, 13, 14, 15, 16, 17, and 18) >	9,179,977.09	18,316,395.88
20. Total Federal Receipts	(subtract line 18 from line 19) >	8,363,321.73	15,647,811.60
II. Disbursements			
21. Operating Expenditures:			
a. Shared Federal/Non-Federal Activity (from Schedule H4)			
i. Federal Share		1,421,132.31	4,448,415.02
ii. Non-Federal Share		775,136.64	2,526,187.82
b. Other Federal Operating Expenditures		833,625.67	4,691,038.10
c. Total Operating Expenditures	(Add a i, ii, and b) >	3,029,894.62	11,665,640.94
22. Transfers to Affiliated/Other Party Committees		74,454.84	360,765.05
23. Contributions to Federal Candidates/Committees and Other Political Committees		-0-	1,755.28
24. Independent Expenditures (use Schedule E)		-0-	-0-
25. Coordinated Expenditures Made by Party Committees (2 U.S.C. 441a(d)) (use Schedule F)		4,195,633.06	4,882,745.69
26. Loan Repayments Made		500,000.00	500,000.00
27. Loans Made			
28. Refunds of Contributions To:			
a. Individuals/Persons Other Than Political Committees		1,500.00	2,050.00
b. Political Party Committees			
c. Other Political Committees (such as PACs)			
d. Total Contribution Refunds	(Add a, b and c) >	1,500.00	2,050.00
29. Other Disbursements			
30. Total Disbursements	(add 21c, 22, 23, 24, 25, 26, 27, 28d, and 29) >	7,801,482.52	17,412,956.96
31. Total Federal Disbursements	(subtract line 21 a ii from line 30) >	7,026,345.88	14,886,769.14
III. Net Contributions/Operating Expenditures			
32. Total Contributions (other than loans) (from line 11d)		8,052,374.23	15,189,424.80
33. Total Contribution Refunds (from line 28d)		1,500.00	2,050.00
34. Net Contributions (other than loans) (subtract line 33 from 32)		8,050,874.23	15,187,374.80
35. Total Federal Operating Expenditures	(add 21 a i and 21 b) >	2,254,757.98	9,139,453.12
36. Offsets to Operating Expenditures (from line 15)		275,001.98	332,327.35
37. Net Operating Expenditures	(subtract line 36 from 35) >	1,979,756.00	8,807,125.77

24043562430

SCHEDULE F

EXHIBIT B

ITEMIZED COORDINATED EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. § 441a(d))

(To be used only by Political Committees in the General Election)

Name of Political Committee (in Full)				
DNC Services Corp. / Democratic National Committee				
Has your Committee been designated to make coordinated expenditures by a political party committee? <input type="checkbox"/> YES <input type="checkbox"/> NO If YES, name the designating committee				
Full Name, Mailing Address and ZIP Code of Subordinate Committee				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
Greenberg-Lake 515 Second Street, N.E. Washington, D.C. 20002	Clinton/Gore U.S. President	Survey Research	7/7/92	22,462.06
			7/7/92	8,741.00
			7/7/92	44,000.00
Aggregate General Election Expenditure for this Candidate—\$ 4,834,668.77				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
Storch-Telle-Group, Inc. 375 West Broadway New York, NY 10012	Clinton/Gore U.S. President	Telemarketing	7/8/92	120,000.00
Aggregate General Election Expenditure for this Candidate—\$ 4,834,668.77				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
Uniglobe Travel One Thomas Circle Washington, D.C. 20005	Clinton/Gore U.S. President	Travel	7/30/92	430.00
Aggregate General Election Expenditure for this Candidate—\$ 4,834,668.77				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
Great American Media 2626 Pennsylvania Ave. Washington, D.C. 20037	Clinton / Gore U.S. President	Media	7/31/92	4,000,000.00
Aggregate General Election Expenditure for this Candidate—\$				
SUBTOTAL of Expenditures This Page (optional)				
TOTAL This Period (last page this line number only)				4,195,633.06

94043562431

BEFORE THE FEDERAL ELECTION COMMISSION

City of Washington)
)
District of Columbia)

AFFIDAVIT OF BRIAN FOUCART

Brian Foucart, being duly sworn, deposes and says:

1. I am Brian Foucart, who resides at 402 East Bellefonte Ave., Alexandria, Virginia, 22301.

2. I hold the position of Deputy Chief of Staff at the Democratic National Committee (DNC). One of my duties in this position is to be informed of and approve every disbursement of funds to a vendor for services provided to the DNC.

3. I have reviewed the DNC's August 1992 report, covering July 1-31, 1992, with the Federal Election Commission. I have also reviewed the DNC's internal records concerning its expenditures during the month of July 1992.

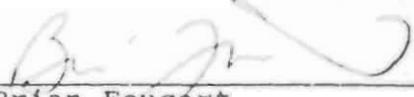
3. The DNC made no expenditure of funds for any promotional campaign spot as described in the complaint filed with the FEC on August 10, 1992 by Fred W. Phelps.

4. The DNC made no contribution of funds to Gloria O'Dell's primary or general election campaign for the U.S. Senate in July 1992.

74043562432

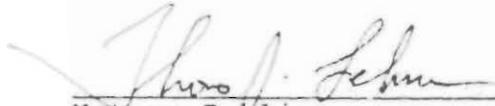
FOUCART AFFIDAVIT, page two

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



Brian Foucart

Sworn and subscribed to by the said Brian Foucart this 23rd day of October, 1992.



Notary Public

My Commission Expires: _____
My Commission expires Nov. 10, 1999

74043562433

MUR 3575

NAME OF COURT:

ADDRESS:

11N

TELEPHONE:

92 OCT 23 PM 4:51

and I hereby designate as my

agent to receive any notification

in connection with the above case and to act on my behalf.

Commissioner

2
4
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4
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5
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2
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4

Robert D. Hill

Signature

ADDRESS:

HOME PHONE:

BUSINESS PHONE:

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIN COPY ROOM

FRED W. PHELPS

3701 W 12TH - P O BOX 1886 - TOPEKA, KS 66601

November 23, 1992

NUK 3575

DEC 1 1 23 PM '92

913 273 0338

**BEFORE THE FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL**

999 "E" STREET NW, WASHINGTON, D.C. 20463

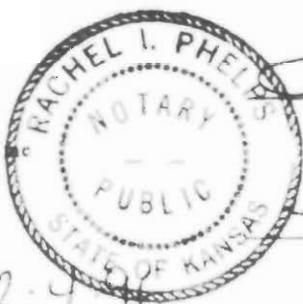
SUPPLEMENT TO COMPLAINT

State of Kansas, County of Shawnee, SS: The undersigned, Fred Phelps, of lawful age, and being first duly sworn upon my oath, depose and say:

1. I previously filed a complaint herein against Gloria O'Dell, and a true copy of that complaint is attached hereto.
2. As a supplement to said complaint, I am attaching hereto and incorporating herein a copy of a letter from me to Ron Brown, Chairman, Democrat National Committee, Washington, D.C., dated July 9, 1992, in which I demanded equal national TV time with my only primary opponent, Gloria O'Dell, on opening night of the Democratic National Convention in New York at Madison Square Garden.
3. I faxed said letter on July 9, 1992 to each of the following persons at the following fax numbers and cities respectively: Ron Brown, FAX #1-202-863-8081 (Washington, D.C.); Bill Clinton, FAX #1-501-372-2292 (Little Rock); and, Al Gore, FAX #1-202-224-0580 and FAX #1-202-966-7150 (Washington, D.C.).
4. I received no answer or response of any kind from anyone to said letter and said demand, and I was not allowed equal time to Gloria O'Dell who appeared some 3 minutes on Monday evening July 13, 1992 prime time TV from Madison Square Garden speaking and displaying O'Dell's toll-free fundraising number (1-800-GLORIA-3) in her campaign against me in the Democratic primary. O'Dell's office stated publicly that they received over 600 calls the first day following and resulting from said TV appearance, with thousands in pledges and contributions.
5. I believe under these circumstances said 3-minute spot was a contribution in kind with a fair value exceeding \$50,000 which should be reported and was not.

94043562435

92 DEC - 1 PM 1:23



Fred Phelps
Fred Phelps

Rachel I. Phelps
Notary Public

Subscribed and sworn to before me
this 24th day of Nov., 1992.

My commission expires: 2-4-93

FRED W. PHELPS

3701 W. 12TH - P. O. BOX 1886 - TOPEKA, KS. 66601

913 273-0338

July 27, 1992

**BEFORE THE FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
999 "E" STREET NW, WASHINGTON, D.C. 20463**

COMPLAINT

State of Kansas, County of Shawnee, SS: The undersigned, Fred Phelps, of lawful age, and being first duly sworn upon my oath, depose and say:

1. I am a duly registered, filed, qualified, and active candidate for nomination to the U.S. Senate on the Democratic ticket for the August 4, 1992 primary in Kansas, and my only Democratic opponent in said primary is Gloria O'Dell. The state and national Democratic Party leaders are illegally promoting O'Dell's candidacy over mine because O'Dell is a lesbian promoting the homosexual agenda which I oppose.

2. On or about July 1, 1992, over my timely objection as discriminatorily denying equal treatment to my candidacy, the Kansas Democratic Party made a contribution in kind to O'Dell in the form of a mailing piece touting her candidacy in opposition to my candidacy to some 12,000 Kansas Democrats, and said mailing had a reasonable value in excess of \$7,500 which O'Dell illegally failed, neglected, and refused to include as a contribution in kind for the period ending July 15, 1992 in her report filed with the FEC as required by law on or about July 21, 1992.

3. On July 13, 1992, over my timely objection as discriminatorily denying equal treatment to my candidacy, the National Democratic Party made a contribution in kind to O'Dell in the form of a nationally televised 3-minute political campaign promotional spot touting her candidacy in opposition to my candidacy and displaying O'Dell's toll-free fundraising number (1-800-GLORIA-3/1-800-456-7423) urging the TV viewing audience to support and vote for O'Dell as against others, and said 3-minute spot had a reasonable value in excess of \$50,000 which O'Dell illegally failed, neglected and refused to include as a contribution in kind for the period ending July 15, 1992 in her said report filed on or about July 21, 1992.

4. I have made timely objections to and demands for rectification of the above-described illegal activities to O'Dell, Ron Brown, Bill Clinton, and Al Gore, to no avail. I have documentation in support of this complaint which I will make available to the FEC upon request. So help me God. Further affiant saith not.



Fred Phelps
Fred Phelps

Rachel L. Phelps
Notary Public

Subscribed and sworn to before me
this 27th day of July, 1992.

My commission/appointment expires: _____

94043562436

Phelps for U. S. Senate

July 9, 1992

1414 SW TOPEKA BLVD.
TOPEKA, KANSAS 66612
PH: 913-234-4903 FAX: 913-233-0766

Ron Brown, Chairman
Democrat National Committee
Washington, D.C.

Dear Ron:

According to the attached news account, you are giving my opponent GLORIA O'DELL an unfair advantage in the Aug. 4 primary by according her preferential treatment in the form of national media exposure next Monday night at a so-called "thematic event" with four other woman candidates for the U.S. Senate. Unlike the other women featured, O'DELL has not won the Kansas Democratic primary and must face me Aug. 4. As you know, Ron, our Party rules strictly forbid taking sides in contested primaries, and our Party rules and platform forbid discrimination based on gender or sexual orientation (O'DELL is a lesbian female, and I am a straight male).

I insist you follow the Party rules and platform in this instance by allowing me equal time and prominence in New York, or by canceling O'DELL's appearance. This is no year for a Party that prides itself on fair play and equal opportunity to waffle on these critical issues, as you often accuse President Bush of doing.

Sincerely,



Fred Phelps

cc: Bill Clinton

Convention to spotlight local

By MARTIN HAWVER
The Capital-Journal Thursday, July 9, 1992

Gloria O'Dell, a candidate for the Democratic nomination to the U.S. Senate, will be featured during the opening night of the Democratic National Convention in New York, convention officials said Wednesday.

Convention officials said O'Dell, of Silver Lake, will be among five woman candidates for the U.S. Senate to be featured in what they called a "thematic event" during the opening night ceremonies at Madison Square Garden. The opening is expected to be televised.

O'Dell campaign workers said they aren't sure just what a "thematic event" entails, but O'Dell's inclusion in the showcase for what the national party considers its cadre of either already-nominated Senate candidates or those who are likely to be nominated buoyed the campaign.

O'Dell has an Aug. 4 primary election challenge by the Rev. Fred Phelps of Topeka.

The winner of the Democratic primary election will challenge Sen. Bob Dole, R-Kan., in the November general election.

It is uncertain how much of Monday night's convention session will be broadcast by major commercial broadcast networks, which have announced they don't intend to provide gavel-to-gavel coverage of either Democratic or Republican national conventions this year.

O'Dell, of Silver Lake, will be among five woman candidates for the U.S. Senate to be featured in a "thematic event" during convention opening night ceremonies at Madison Square Garden.

24043562437

OAC 8861

FRED W. PHELPS

3701 W. 12TH - P.O. BOX 1886 - TOPEKA KS 66601

March 31, 1993

R13 2726338
93 APR -5 PM 4:35
RECEIVED
FEDERAL ELECTION COMMISSION

Mr. Richard Denholm
Federal Election Commission
1325 "K" Street, NW
Washington, D.C. 20463

Re: Complaint against GLORIA O'DELL, No. MUR 3575

Dear Mr. Denholm:

This is a response to your March 30 telephone request for additional information in the captioned matter. Enclosed please find five pages from the July 1992 issue of the Kansas Democratic Party Demogram, containing the four places touting O'Dell and including her fundraising number (1-800-Gloria3) which I spoke to you about. The deliberate omission of my name as a primary candidate also (I got almost a third of the votes cast) makes me believe this literature mailed to some 7,000-plus Kansans constitutes a contribution-in-kind. I have newspaper stories stating the party is backing O'Dell and denouncing my candidacy, if you want them.

Also enclosed are stories from each of our three big papers (The Wichita Eagle, The Kansas City Star, and The Topeka Capital-Journal) telling about the 3-minute nationally televised speech O'Dell was allowed to give July 13 at the Democratic National Convention in New York, over my objections, where O'Dell promoted her fundraising number (1-800-Gloria3) and received "at least 600 calls from just about 9 p.m. Monday night until after midnight."

If you need additional help from me, please advise. Your consideration is appreciated.

Sincerely,

Fred Phelps

Encls. As indicated

94043562438

Topeka Capital-Journal, Wednesday, July 15, 1992

■ **O'Dell speech sparks calls** — The seven telephone lines at Gloria O'Dell's Topeka campaign office "just went nuts" for at least three hours after her brief speech from the floor of the Democratic National Convention, campaign officials in Topeka said.



Gloria O'Dell

"We must have fielded at least 600 calls from just about 9 p.m. Monday night until after midnight," said Erwin Seba, O'Dell's press secretary.

O'Dell's speech was carried live on C-SPAN and on some public television stations.

O'Dell said she stuck to her tightly timed two-minute speech although other speakers used more time.

"I wanted to get my point across quickly, concisely, and I think that's what I did," O'Dell said.

O'Dell is running against Topekan Fred Phelps for the Democratic nomination to challenge incumbent Sen. Bob Dole.

—From staff and wire reports

94043562439

Kansan Gloria O'Dell speaks against Dole at convention

WICHITA EAGLE Tuesday, July 14, 1992

Associated Press

NEW YORK — Gloria O'Dell took her upstart challenge to Senate Minority Leader Bob Dole at the Democratic National Convention on Monday, deriding the Kansas Republican as "Senator Straddle."

"When I ask the question, 'Can Bob Dole be defeated?' the answer is loud and clear: We cannot afford to re-elect the problem," O'Dell said in a three-minute speech on the convention's opening night.

The 46-year-old former television newswoman was among a half-dozen women Senate candidates showcased during the convention, which is expected to nominate Arkansas Gov. Bill Clinton for president. O'Dell, who is not a delegate, said their numbers show "change is in

the wind" for the Senate, which has two women among its 100 members.

"In Kansas, the wind blows strong across the Plains," she said.

O'Dell promoted her toll-free fund-raising number, which she hoped would help her compete with Dole's campaign treasury of about \$2 million.

Dubbing her campaign "Gloria vs. Goliath," the longtime Democratic activist said a contribution would "put the pebble in the slingshot to fell Goliath in November."

"Bob Dole's power is a wrecking ball to crush family leave, the civil-rights act, aid to Israel and women's rights," she said. "When he's not Senator Straddle, he's Senator Stop. Either way, his is not the leadership Kansas or America needs today."

24043562440

Missouri and Kansas make small splashes as two make speeches

Kansas City Star Tuesday, July 14, 1992

By JOHN A. DVORAK
and JOHN PETTERSON
Staff Writers

NEW YORK — For two Democrats from Missouri and Kansas, the Big Apple afforded a brief but highly desired moment in the spotlight Monday night.

In an appearance before the Democratic National Convention, U.S. Rep. Alan Wheat of Kansas City blasted Republicans in what he later termed an "ultimate" speech.

Also addressing the Democratic gathering was U.S. Senate candidate Gloria O'Dell of Silver Lake, Kan., who described her campaign against Senate Minority Leader Bob Dole as "Gloria vs. Goliath."

Democrats consider it a high honor to speak to their national convention, even if their appearances are brief. Party officials often use convention time to showcase selected Democrats, particularly Democrats who may need a boost back home.

Wheat, who faces a re-election challenge from fellow Democrat Fred Arbanas, twice mentioned Harry Truman in his five-minute talk.

"Sure George and the Republicans have been successful running for office," Wheat told the convention. "But it's not what you run for that counts, it's what you stand for. Democrats know that. Bush doesn't."

Wheat spoke in his role as co-chairman of the convention's credentials committee.

O'Dell, a longtime party activist who has yet to win the Democratic Senate nomination, ripped Dole in her three-minute appear-



Wheat



O'Dell

ance.

"Bob Dole's power is a wrecking ball to crush family leave, the Civil Rights Act, aid to Israel and women's rights," she said. "When he's not Senator Straddle, he's Senator Stop. Either way, his is not the leadership Kansas or America needs today."

Before O'Dell can take on the state's senior Republican senator, she first must defeat Topeka's Fred Phelps Sr. in the Aug. 4 Democratic primary.

Republicans consider Dole all but unbeatable as he makes his well-financed re-election bid.

O'Dell even used her brief national exposure to put in a plug for her toll-free fund-raising hotline — 1-800-Gloria-3.

O'Dell said she detected unrest.

"Change is in the wind," she said. "And in Kansas, the wind blows strong across the plains."

Wheat, who received polite applause for his speech, appeared in the early stages of the convention session Monday. Many Missouri delegates hadn't even arrived yet.

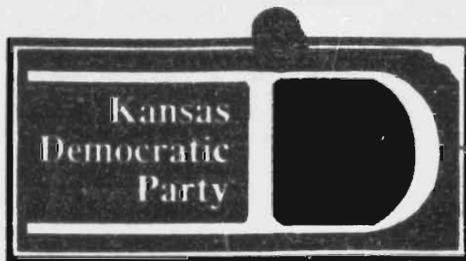
Nevertheless, Wheat prepared at length for his talk.

"It's one of the ultimate places you can speak," he said.

O'Dell spoke from a position on the floor of the convention center.

24043562441





emogram

July 1992

DEMOFEST '92 WICHITA, KANSAS

The second annual DEMOFEST celebration in Wichita will be held August 14th and 15th at the Ramada Inn Downtown.

According to John T. Bird, State Chairman, the event will take on a different focus and flavor than the inaugural DEMOFEST which happened in October of 1991.

"This will be a more laid back, informal weekend with a number of workshops and seminars," said Bird.

"Our goal is to bring people together after the primary, visit, socialize and plan for the general election," Bird added.

There will be no keynote speaker or banquet, according to Robert Swanson, State Party Executive Director.

"At last year's event we

had individuals who were concerned that there were too many exclusive or high priced events," said Swanson. "This year there will be no \$50 a plate dinner."

Instead, said Swanson, a one time \$35 registration fee will allow an attendee to attend all the events.

"The \$35 registration will get you into the dance Friday night, breakfast and lunch on Saturday and, of course, all the workshops," said Swanson.

A state committee meeting will be held at 12:30pm, but workshops will be going on throughout the morning and afternoon.

"If you're not a state committee member or candidate there will still be things to attend," said Swanson.

Congressman Dan Glickman will host the Friday night dance. "Congressman Glickman is not only hosting the event, but he is also providing the band for the evening," said Bird. "We're calling it 'Dancing With Dan & the Democrats.' It should be a fun evening."

According to Mary Isehour, Director of the Coordinated Campaign for the State Party, workshops will include specific activities for county party officials and activists.

"Our goal," said Swanson, "is to communicate with the grass roots volunteers, discuss specific election campaign ideas and implement them."

TENTATIVE SCHEDULE

FRIDAY
8:00-11:00pm - Dancing with Dan & the Democrats

SATURDAY
8:00-9:30am - Sedgwick County Democratic Party Breakfast - Welcome to Wichita
9:30-10:00am Rules and By-laws Meeting

10:00-11:30am Executive Committee Meeting, Grassroot Workshop: The Coordinated Campaign

11:30-12:30pm Express Lunch
Credentiaing for State Committee

12:30-1:30pm State Committee Meeting

2:00-3:15pm Workshops: County Parties & Projects

3:30-4:45pm Workshops: Election Ideas & Issue Roundtables

5:30-7:00pm STAR 34 Reception

State committee selects national convention delegates and adopts resolutions

The final set of delegates to the Democratic National Convention was selected May 16 during a state convention at the Jayhawk Tower in Topka.

Current National Committeewoman Shirley Jacques and Committeeman Dennis Langley were selected to serve for second terms (1992 - 1996).

Delegate selection highlighted a series of day long activities, including an Executive, Rules and By-laws and Resolutions Committee meetings.

Executive Committee members were pleased to hear that all 1990 election debts had been paid except one bank note

for \$30,000. The party debt was reduced from \$155,000 starting in November of 1991 which was down from \$220,000 from November of 1990. The committee discussed at length if the party should go into debt during future campaigns to help elect Democrats. Noting that the Party's primary reason for existing was to elect Democrats, the majority of the committee agreed that if the need arose, entering into debt should always be considered an option.

The Executive committee also encouraged the adoption of new by-laws officially making congress persons
CONTINUED ON PAGE 6)

Kansas coordinated campaign focus of state party effort

Under the umbrella of the Kansas Democratic Party, various Democratic organizations and campaigns have joined together to create the Kansas Coordinated Campaign.

The purpose of the organization, says State Party Executive Director, Robert Swanson, is to pool resources, use them wisely and not duplicate efforts. "There are significant campaigns this year including concentrated efforts by House and Senate caucus Democrats to help candidates win elections.

"By keeping in constant communication," said Mary Isehour, Coordinated Campaign Director. "We give all of our candidates a better chance at winning." (CONTINUED PAGE 4)

24043562442



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Gloria vs. Goliath

Gloria O'Dell, 46, filed June 10 to be a Democratic candidate for U.S. Senate. Republican Robert Dole is seeking his fifth six year term.

Characterizing her campaign as "Gloria -vs- Goliath", O'Dell said the two and half million people of Kansas would be fuel for her campaign to offset the two and a half million dollars in Dole's campaign war chest.

Democratic National Chairman Ron Brown called Dole a "Goliath" created inside Washington's beltway and that Gloria was the giant killer from the heartland.

O'Dell's campaign held a noon time rally in the Old Supreme Court room of the State Capitol following her official entry into the race. A capacity crowd cheered her announcement and sang to the music of a local jazz band.

Highlighting Dole's long tenure in office and the continuing decline of the American economy for the past 3 decades, O'Dell condemned Dole for being out of touch with Kansans. "Today, I have more in common with the people of Kansas than Bob Dole whose homes are in D.C. and

Florida," said O'Dell.

O'Dell who is known as a community and Party activist grew up in Bogue, northeast of Hays. The first woman T.V. reporter in northeast Kansas, O'Dell also served as Congresswoman Martha Key's Press Secretary and campaign manager to State Treasurer Sally Thompson. O'Dell also served as a communication director for Volume Shoe and later as a social worker.

O'Dell's campaign will focus on the future of Kansas. "I could take a page from Ronald Reagan and ask 'Are you better off today than you were four years ago?'" said O'Dell. "But it was the wrong question in 1980 and it is the wrong question today."

"The question should be 'Will our children be better off tomorrow than they are today?'" said O'Dell.

O'Dell's son, Sean, 24, was on hand as she made announcements in Bogue, Wichita, Topeka, Kansas City and Overland Park leading up to her June 10 filing.

The O'Dell Committee has opened a campaign office at 730 S. Kansas in downtown Topeka.

The Party Line

John T. Bird, State Chair

Kansas
Democratic
Party



FOR the third consecutive cycle, Kansas Democrats have outworked Republicans to recruit more candidates for the state legislature.

The hard work performed by countless people in Topeka and across the state have ensured that voters in Kansas will have choices when they go to the polls. It also is the first step in creating history.

Democrats have not controlled the Senate in 80 years and Democrats have never held a majority in the House in consecutive elections. The first step in writing that history occurred when 37 out of 40 senate seats were filled and 116 out of 125 house seats were filled on Wednesday June 24th.

Democrats should be tremendously proud of this accomplishment. In a state where unaffiliated voters outnumber even Democrats, the majority party, the Republican Party, was not able to recruit the number or the quality of candidates filed by The Democratic Party.

Our party also has numerous congressional candidates running for office, and Gloria O'Dell for U.S. Senate.

1990 may have been the watershed year in Kansas politics. The defeat of an incumbent Republican governor, retaining the treasurer's office

and the majority in the house happened in a non-presidential election year.

The cycle may have started with the 1976 legislative races in which Democrats won control of the House for the first time since before World War I, and Dan Glickman defeated 16 year incumbent Republican Garner Shriver.

John Carlin defeated an incumbent Republican in 1978 and served two terms. The House majority was lost in 1978, but the number of Democrats in the House and Senate remained strong.

Finney's victory, Thompson's landslide election, the near misses of Paul Feleciano (Insurance Commissioner) and Bert Cantwell (Attorney General), and the House majority punctuated the fourteen years since 1976.

George and Robert Docking taught Kansas Democrats that they could win the Governor's Office. Since then, we have proved that we can win much more.

If the house majority is maintained in 1992 and a majority gained in the senate, the image of Kansas as a monolithic Republican state will be forever reversed.

That is good news for the state of Kansas.

OFFICERS of THE KANSAS DEMOCRATIC PARTY

John T. Bird
State Chair
913-625-6919

Rosetta Dotson
Vice-Chair
913-782-1962

Randy Rathbun
Treasurer
316-683-5207

Charlene Potter
Secretary
316-431-4023

Shirley Jacques
National
Committeewoman
913-823-2676

Dennis Langley
National Committeeman
316-662-7986

ADVERTISING INFORMATION: THE DEMOGRAM now includes advertisements from individuals and politically aware businesses and organizations. **These advertisements do not constitute an endorsement of a particular candidacy or viewpoint.** Advertising will be accepted for the next and succeeding issues. The DEMOGRAM is published quarterly with a circulation of more than 12,000. For further information, please contact David W. Taylor at 913-234-0425 / FAX: (913)234-8420.

COLOPHON: The Demogram is a quarterly news magazine published by the Kansas Democratic Party. All letters and subscription requests should be sent to KANSAS DEMOCRATIC PARTY/P.O. Box 1914, Topeka, KS 66603 or phone (913)234-0425

STATE PARTY OFFICE STAFF

Robert G. Swanson
Executive Director

Lyn Shaw
Associate Director

David W. Taylor
Director of Special Projects

Troy Findley
Bookkeeper - System Manager

Shawna Hanrahan
Secretary

Michelle Smith
Summer Intern

94043562444

Feedback...

What are Kansas Democrats thinking?

Demofest '92

Demofest '92 is scheduled for August 14 & 15 in Wichita. We need your input to help us plan this event. What issues or concerns would you like addressed at the workshops?

Workshop Topics: _____

Small Group Discussions: _____

Other: _____

Send your FEEDBACK response to: KANSAS DEMOCRATIC PARTY
P.O. Box 1914
Topeka, KS 66601-1914

Coordinated campaign underway

(CONTINUED FROM COVER)

The coordinated effort is designed to draw in candidates, activists and party leaders.

"Traditionally, we have candidate training workshops during election years," said Swanson, "but we also want to draw county chairs, vice chairs, etc. into the coordinated campaign and be a part of the momentum."

According to Isenhour, the House and Senate caucuses, the congressional campaigns and the U.S. Senate race are participating.

"The state party, as do these other organizations, provide services to candidates. Our effort is to utilize those services the most effective way possible," said Isenhour.

Voter registration information, campaign material design and publication, training seminars and advertisement development are only a few of the services being provided.

"The key is to involve as many people as possible in every county," said Swanson. "What we learned in 1990 was that just improving communication between organizations and candidates was extremely productive."

New intern

Michelle Smith of Osage City is serving as a summer intern in the Kansas Party State Office. Smith, a Kansas Young Democrat, attends Johnson County Community College.

"We're very glad to have Michelle on board," said Robert Swanson. "She's excited about being a Democrat and learning the campaign process."

Democratic candidates for U.S. Senate and Congress

U.S. Senate

Gloria O'Dell H.Q.

P.O. Box 2393
Topeka, KS 66601

1-800-Gloria3
(a fundraising phone line)
1-913-357-1777
(office phone line)

1st Congressional District

John Divine
P.O. Box 2544
Salina, KS 67402
H-(913) 823-3447
B-(913) 825-5701

Duane West
319 N. 8th St.
Garden City, KS 67846
(316) 276-7181
Jerry Molstad
2421 Webster
Dodge City, KS 67801
(316) 225-3575

2nd Congressional District

Jim Slattery H.Q.
726 Kansas
P.O. Box 1978
Topeka, KS 66601

3rd Congressional District

George Davis
1417 W. Spruce
Olathe, KS
(913) 764-4605

Tom Love
7037 Haskell
Kansas City, KS 66109
(913) 334-4288

4th Congressional District

Dan Glickman H.Q.
121 E. Douglas
P.O. Box 2393
Wichita, KS 67201
(316) 262-5184

2nd Annual Barkis Roundup set

The 2nd Annual Barkis ROUNDUP is set again for Wichita and Louisburg. The ROUNDUP in Wichita will be held again on August 28th at the Bellair Farm. On August 30th, the Louisburg ROUNDUP will be held on Speaker Marvin Barkis' Farm. The ROUNDUP event is used as a Fundraiser for House Democrats to maintain the majority.

The Class of '74 pay tribute to Roy and campaign staff

The people who almost defeated one term senator Bob Dole in 1974 gathered at the Governor's Row House in Topeka to pay tribute to Dr. Bill Roy, Paul Pendergast, and the rest of the campaign team.

The nostalgic event was used as a fundraiser for U.S. Senate candidate Gloria O'Dell. The event was highlighted by a check to O'Dell's campaign from the Democratic Senatorial Campaign Committee in the amount of \$17,500. O'Dell has been endorsed by John T. Bird, State Chair, and many state executive committee members.

Letters from Ron Brown, National Democratic Party Chairman, John T. Bird, and others were read.

Brown's letter praised the years of work Pendergast gave the Democratic Party and cheered the O'Dell campaign. "Bob Dole is a goliath made from inside the Washington Beltway," said Brown. "Gloria is a giant killer from the heartland."

Jim Slattery

U.S. Representative

"Welcome to DEMOFEST '92.
Best wishes to all our Democratic candidates."

Paid for by Slattery for Congress, Mike Van Dyke, Treasurer



How to Join STAR 34

Just fill out the application form printed on the enclosed envelope in this issue of the DEMOGRAM.

If you are not a member or if you wish to pay your 1992 membership, or if you would like to increase your support to the Party, please do so today.

A STAR 34 REGISTRATION & INFORMATION BOOTH will also be at DEMOFEST '92 at the Ramada Inn, Downtown Wichita.

For complete details, contact David W. Taylor, Director of Special Projects at the State Office (913) 234-0425.

Workshops conducted by K.C.C.

A record number of local and state candidates turned out to participate in Party sponsored candidate workshops June 27 and 28.

Kansas House and Senate candidates dominated the registration, but local candidates also participated.

The workshops, which were conducted as part of the Kansas

Coordinated Campaign, drew over 150 candidates at locations in Topeka and Wichita.

"Mary Isenhour did a wonderful job with the workshops," said Lyn Shaw, State Party Associate Director. "A number of elected officials and activists were the key to putting on the workshops."

Make your plans to Dance with Dan!

Dan Glickman invites you to THE DEMOFEST dance...
Friday, August 14,
Wichita Ramada Broadview.
8 p.m. - 11p.m.
Refreshments.
Admission included with DEMOFEST Registration.
Music by the Pat McJimsey Band.

Paid for by the Glickman for Congress Committee, L.D. Kenda, Treasurer

UUC 4136



Democratic National Committee

August 18, 1993

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

RE: Pending Matters Under Review in which DNC Services Corp./Democratic National Committee (FEC ID: C00010603) is a Respondent

Dear Mr. Noble:

As you know, the undersigned now serve, respectively, as General Counsel and Deputy General Counsel of the Democratic National Committee. Accordingly, we respectfully request that all correspondence with respect to the following pending Matters Under Review, for which the Treasurer of the committee has previously designated the General Counsel as counsel of record, should now be addressed to the undersigned as counsel of record:

~~MUR 3575~~

Thank you for your attention to this matter.

Sincerely yours,

Joseph E. Sandler
Joseph E. Sandler
General Counsel

Neil Reiff
Neil Reiff
Deputy General Counsel

24043562447

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

JUN 30 3 55 PM '94

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of

)
) Enforcement Priority
)

GENERAL COUNSEL'S QUARTERLY REPORT

I. INTRODUCTION

This report is the second Enforcement Priority System Quarterly Report. The purpose of this Quarterly Report is to recommend that the Commission no longer pursue the identified lower priority and stale cases.

II. CASES RECOMMENDED FOR CLOSING

A. Cases Not Warranting Further Pursuit Relative to Other Cases Pending Before the Commission

A critical component of the Priority System is identifying those pending cases that do not warrant the further expenditure of resources. Each incoming matter is evaluated using Commission approved criteria

By closing such cases the Commission is able to use its limited resources to focus on more important cases.

Having evaluated incoming matters, this Office has identified 16 cases which do not warrant further pursuit relative to the other pending cases.¹ A short

1. These matters are: MUR 3920; MUR 3930; MUR 3934; MUR 3939; MUR 3942; MUR 3943; MUR 3945; MUR 3948; MUR 3953; MUR 3955; MUR 3957; MUR 3964; MUR 3965; MUR 3967; RAD 94L-22; and RAD 94L-25.

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description of each case and the factors leading to assignment of a relatively low priority and consequent recommendation not to pursue each case is attached to this report. See Attachments 1-16. For the Commission's convenience, the narratives for externally-generated matters are immediately followed by the complaint and response(s) and the narratives for internally-generated matters are immediately followed by the referral.

B. Stale Cases

Investigations are severely impeded and require relatively more resources when the activity and evidence are old. Consequently, the Office of General Counsel recommends that the Commission focus its efforts on cases involving more recent activity. Such efforts will also generate more impact on the current electoral process and are a more efficient allocation of our limited resources. To this end, this Office has identified 42 cases that

do not warrant further investment of significant Commission resources.² Since the recommendation not to pursue the identified cases is based on staleness, this Office has not prepared separate

2. These matters are: MUR 3132; MUR 3432; MUR 3466; MUR 3470; MUR 3473; MUR 3495; MUR 3558; MUR 3575; MUR 3581; MUR 3594; MUR 3600; MUR 3625; MUR 3647; MUR 3663; MUR 3684; MUR 3698; MUR 3712; MUR 3733; MUR 3744; MUR 3749; MUR 3756; MUR 3759; MUR 3767; MUR 3776; MUR 3779; RAD 92L-26, RAD 93L-25; RAD 93L-26; RAD 93L-29; RAD 93L-31; RAD 93L-33; RAD 93L-35; RAD 93L-36; RAD 93L-38; RAD 93L-39; RAD 93NF-02; RAD 93NF-03; RAD 93NF-06; RAD 93NF-10; RAD 93NF-12; RAD 93NF-15; and RAD 93NF-20.

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narratives for these cases. However, for externally-generated matters in which the Commission has made no findings, the complaint and response(s) are attached to the report and for internally-generated matters in which the Commission has made no findings, the referral is attached. See Attachments 17-53. Because the Commission has already made findings in five of the stale cases, no additional information is being attached to this report in regard to these cases.³

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3. These matters are: MUR 3132, MUR 3432, MUR 3466, MUR 3495, and MUR 3733.

This Office recommends that the Commission exercise its prosecutorial discretion and no longer pursue the identified cases effective August 1, 1994. This will allow the Legal Review Team adequate time to prepare the Pre-MUR and MUR files so that the cases can appear on the public record by September 1, 1994, within 30 days of the August 1, 1994, closing date. This timeframe also will enable this Office to prepare closing letters so that the letters can be mailed on August 2, 1994. Additionally, the Press Office will need time to review the files for inclusion in one of its press releases.

III. RECOMMENDATIONS

A. Decline to open a MUR and close the file in the following matters to be effective on August 1, 1994:

- 1) RAD 92L-26
- 2) RAD 93L-25
- 3) RAD 93L-26
- 4) RAD 93L-29
- 5) RAD 93L-31
- 6) RAD 93L-33
- 7) RAD 93L-35
- 8) RAD 93L-36
- 9) RAD 93L-38
- 10) RAD 93L-39
- 11) RAD 94L-22
- 12) RAD 94L-25
- 13) RAD 93NF-02
- 14) RAD 93NF-03
- 15) RAD 93NF-06
- 16) RAD 93NF-10
- 17) RAD 93NF-12
- 18) RAD 93NF-15
- 19) RAD 93NF-20

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B. Take no action, close the file effective on August 1, 1994, and approve the appropriate letter in the following matters:

- 1) MUR 3470
- 2) MUR 3473
- 3) MUR 3558
- 4) MUR 3575
- 5) MUR 3581
- 6) MUR 3594
- 7) MUR 3600
- 8) MUR 3625
- 9) MUR 3647
- 10) MUR 3663
- 11) MUR 3684
- 12) MUR 3698
- 13) MUR 3712
- 14) MUR 3744
- 15) MUR 3749
- 16) MUR 3756
- 17) MUR 3759
- 18) MUR 3767
- 19) MUR 3776
- 20) MUR 3779
- 21) MUR 3920
- 22) MUR 3930
- 23) MUR 3934
- 24) MUR 3939
- 25) MUR 3942
- 26) MUR 3943
- 27) MUR 3945
- 28) MUR 3948
- 29) MUR 3953
- 30) MUR 3955
- 31) MUR 3957
- 32) MUR 3964
- 33) MUR 3965
- 34) MUR 3967

9 4 0 4 3 5 6 2 4 5 2

C. Take no further action, close the file effective on August 1, 1994, and approve the appropriate letter in the following matters:

- 1) MUR 3132
- 2) MUR 3432
- 3) MUR 3466
- 4) MUR 3495
- 5) MUR 3733

Date

6/30/94


Lawrence M. Noble
General Counsel

24043562453

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Enforcement Priority) Agenda Document
#X94-72

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on July 19, 1994, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions with respect to Agenda Document #X94-72:

A. Decline to open a MUR and close the file in the following matters to be effective on August 1, 1994:

- 1) RAD 92L-26
- 2) RAD 93L-25
- 3) RAD 93L-26
- 4) RAD 93L-29
- 5) RAD 93L-31
- 6) RAD 93L-33
- 7) RAD 93L-35
- 8) RAD 93L-36
- 9) RAD 93L-38
- 10) RAD 93L-39
- 11) RAD 94L-22
- 12) RAD 94L-25
- 13) RAD 93NF-02
- 14) RAD 93NF-03
- 15) RAD 93NF-06
- 16) RAD 93NF-10
- 17) RAD 93NF-12
- 18) RAD 93NF-15
- 19) RAD 93NF-20

(continued)

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Federal Election Commission
Certification: Enforcement Priority
July 19, 1994

Page 2

B. Take no action, close the file effective on August 1, 1994, and approve the appropriate letter in the following matters:

- 1) MUR 3470
- 2) MUR 3473
- 3) MUR 3558
- 4) MUR 3575
- 5) MUR 3581
- 6) MUR 3594
- 7) MUR 3600
- 8) MUR 3625
- 9) MUR 3647
- 10) MUR 3663
- 11) MUR 3684
- 12) MUR 3698
- 13) MUR 3712
- 14) MUR 3744
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- 17) MUR 3759
- 18) MUR 3767
- 19) MUR 3776
- 20) MUR 3779
- 21) MUR 3920
- 22) MUR 3930
- 23) MUR 3934
- 24) MUR 3939
- 25) MUR 3942
- 26) MUR 3943
- 27) MUR 3945
- 28) MUR 3948
- 29) MUR 3953
- 30) MUR 3955
- 31) MUR 3957
- 32) MUR 3964
- 33) MUR 3965
- 34) MUR 3967

(continued)

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C. Take no further action, close the file effective on August 1, 1994, and approve the appropriate letter in the following matters:

- 1) MUR 3132
- 2) MUR 3432
- 3) MUR 3466
- 4) MUR 3495
- 5) MUR 3733

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

Attest:

7-20-94
Date

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

7404356246



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 2, 1994

Fred Phelps
3701 W. 12th
P.O. Box 1886
Topeka, KS 66601

RE: MUR 3575

Dear Mr. Phelps:

On August 10, 1992, the Federal Election Commission received your complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act").

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action in the matter. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on August 1, 1994. This matter will become part of the public record within 30 days.

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

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

24043562487



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

AUG 02 1994

Jo Ann Van Meter, Esq.
525 S.W. Topeka Blvd.
Topeka, KS 66603

RE: MUR 3575
Gloria O'Dell for U.S. Senate and
Thomas G. Meek, as Treasurer

Dear Ms. Van Meter:

On August 13, 1992, the Federal Election Commission notified your clients, Gloria O'Dell for U.S. Senate and its treasurer, of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action against your clients. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on August 1, 1994.

The confidentiality provisions of 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 prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

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

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

24043562458



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

AUG 02 1994

Daniel Lykins, Treasurer
Kansas Democratic State Committee
P.O. Box 1914
Topeka, KS 66601

RE: MUR 3575
Kansas Democratic State Committee
and Daniel Lykins, as Treasurer

Dear Mr. Lykins:

On August 13, 1992, the Federal Election Commission notified Kansas Democratic State Committee (Committee) and its treasurer, of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action against the Committee and you, as treasurer. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on August 1, 1994.

The confidentiality provisions of 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 prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

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

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

24043562459



FEDERAL ELECTION COMMISSION

WASHINGTON DC 20463

AUG 02 1994

Joseph E. Sandler, Esq., General Counsel
Neil Reift, Esq., Deputy General Counsel
Democratic National Committee
430 S. Capitol Street, SE
Washington, DC 20003

RE: MUR 3575
Democratic National Committee and
Robert T. Matsui, as Treasurer

Dear Messrs. Sandler and Reift:

On August 13, 1992, the Federal Election Commission notified your clients, Democratic National Committee and Robert T. Matsui, as treasurer, of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action against your clients. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on August 1, 1994.

The confidentiality provisions of 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 prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

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

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

94043562480



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

THIS IS THE END OF MUR # 3575

DATE FILMED 8-30-94 CAMERA NO. 2

CAMERAMAN JM H

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