



FEDERAL ELECTION COMMISSION

WASHINGTON DC 20461

THIS IS THE BEGINNING OF MJR # 3687

DATE FILMED 10/29/93 CAMERA NO. 2

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F.E.C.  
SECRETARIAT

MUR 3687

92 NOV 16 PM 4:06

BEFORE THE  
FEDERAL ELECTION COMMISSION

COMPLAINANT: Loraine Miller  
c/o Attorney Kevin M. O'Keefe  
906 Olive Street, Suite 300  
St. Louis, Missouri 63101

Home Address:  
704 Wild Walnut  
Manchester, MO.  
63021

RESPONDENTS: Bridgeton Air Defense, Inc.  
12561 Calburne  
St. Louis, Missouri 63044

**SENSITIVE**

Bridgeton Air Defense Political Action Committee  
Wilfried Adelt, Treasurer  
14810 Woodford way  
St. Louis, Missouri 63044

John Joseph Klobnak  
12740 Lonsdale  
St. Louis, Missouri 63044

John B. Taylor  
12748 Marburn  
St. Louis, Missouri 63044

Dominick Ferranto, Jr.  
613 Woodbriar Ln.  
St. Peters, Missouri 63376

"Citizens Against Horn"  
c/o 12561 Calburne  
St. Louis, Missouri 63044  
and  
c/o 613 Woodbriar Ln.  
St. Peters, Missouri 63376

**AFFIDAVIT**

State of Missouri )  
                          ) SS  
County of St. Louis )

Comes now Loraine Miller, of lawful age and duly sworn upon her oath, and deposes and states as follows:

1. I am a resident of the 2nd Congressional District of the State of Missouri.

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2. Congresswoman Joan Kelly Horn is a candidate for reelection to the office of United States Representative for the 2nd Congressional District of Missouri in the November 3, 1992 general election.

3. To my personal knowledge and based on statements made by residents of the 2nd Congressional District and copies of the appended materials viewed by me, copies of the material attached hereto as Exhibit No. 1 and incorporated herein by reference were distributed to members of the public throughout the 2nd Congressional District in St. Louis and St. Charles counties since late September, 1992, including, but not limited to: Kirkwood High School on October 13, 1992; placement on vehicles at various parking lots in St. Louis and St. Charles counties during the past weeks; distribution to patrons at several shopping centers in St. Louis and St. Charles counties on at least three occasions, to wit: October 3rd, 10th and 17th, 1992; distribution at various places of employment within the 2nd Congressional District; placement in residential mailboxes in portions of St. Charles County within the said District on various recent dates, and other occasions unknown to me.

4. The material attached as Exhibit No. 1 expressly advocates the defeat of Congresswoman Horn in the November 3rd general election.

5. Based on statements made Respondent Taylor and by persons in attendance at a meeting held on or about October 18, 1992 in the City of Bridgeton, Missouri, Respondent John B. Taylor is a leader of the organization identified on Exhibit # 1 as "Citizens Against Horn" and is responsible, at least in part, for directing the activities of that organization with respect to advocating the defeat of Congresswoman Joan Kelly Horn in the November 3rd general election.

6. On the same bases as the foregoing, "Citizens Against Horn" has caused at least 100,000 copies of Exhibit No. 1 to be printed and produced, has distributed the materials as described above, will continue to produce and distribute the same or similar materials and threatens to make further expenditures, as that term is defined in 2 USC § 431(9) and 11 CFR 100.8, for printed or broadcast communications expressly advocating the defeat of Congresswoman Horn.

7. Based on listings in the Greater St. Louis telephone directory, the phone numbers printed at the bottom of Exhibit No. 1 are those of Respondent Bridgeton Air Defense, Inc.

and Respondent Dominick Ferranto Jr.

Based on the use of their telephone numbers on Exhibit No. 1, I believe that Respondents Bridgeton Air Defense, Inc. and Ferranto are affiliated with and responsible for the activities of "Citizens Against Horn", including payment for and production and

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distribution of Exhibit No. 1 and the provision of financial support and in kind expenditures in support of the activities of "Citizens Against Horn."

8. Respondent Bridgeton Air Defense Political Action Committee registered as political committee with the Federal Election Commission on or about August 22, 1990. Respondent Wilfried Adelt is listed as the treasurer of Respondent Bridgeton Air Defense. Respondent Bridgeton Air Defense Political Action Committee has not filed periodic or pre-election reports of receipts and disbursements as required by law. Nor has said Respondent filed any report of expenditures for communications advocating the defeat of Congresswoman Horn.

9. Based on statements made by Respondent John Joseph Klobnak, Respondent Klobnak claims to have prepared materials for broadcast advertisements and communications expressly advocating the defeat of Congresswoman Horn and intends to cause Respondents Bridgeton Air Defense Inc. (of which Respondent Klobnak is a member of the Board of Directors), Bridgeton Air Defense Political Action Committee, "Citizens Against Horn" (of which Respondent Klobnak claims to be a leader) and other organizations and persons not known to me to purchase broadcast time in order to disseminate those communications prior to the November 3, 1992 general election.

10. The activities of Respondents are illegal and in violation of the provisions of The Federal Election Campaign Act in the following respects:

- A. Exhibit No. 1 fails to comply with the requirements for the identification of persons and committees associated with payment for political communications.
- B. Pre-election reports regarding these expenditures have not been filed as required by law by either "Citizens Against Horn" or Bridgeton Air Defense Political Action Committee and its treasurer, Respondent Adelt.
- C. "Citizens Against Horn" and Respondents Taylor and Klobnak have not complied with the special reporting requirements for independent expenditures within twenty days of an election.
- D. "Citizens Against Horn" has failed to register as a political committee within the time allowed by law.
- E. All of the Respondents have failed to comply with the requirements for reporting contributions and independent expenditures for communications

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advocating the defeat of Congresswoman Horn.

- F. Bridgeton Air Defense Political Action Committee has not filed reports of receipts and expenditures as required by law.
- G. Bridgeton Air Defense, Inc. is organized as a not-for-profit corporation under the laws of the State of Missouri and claims to be exempt from Federal income tax under section 501(c)(4) of the Internal Revenue Code, yet, if the information provided to Complainant as recounted above is correct, it is using its resources and making, at least, in kind contributions for the purpose of paying for communications advocating the defeat of Congresswoman Horn, contrary to both the Federal Election Campaign Act and the Internal Revenue Code.

Because these violations are continuing, and due to the immediacy of the November 3rd election and the potential for irreparable harm if the electorate is misled by the actions described, Complainant prays, in addition to other remedies, that the Commission immediately initiate injunctive action to prohibit violations by Respondents or any "connected organization" associated with or responsible for the violations described.

*Loisine Miller*  
Complainant

Subscribed and Sworn to before me this 27<sup>th</sup> day of October, 1992.

*Kevin M. O'Keefe*  
Notary Public

My Commission Expires:

KEVIN M. O'KEEFE  
NOTARY PUBLIC, STATE OF MISSOURI  
ST. LOUIS CO.  
MY COMMISSION EXP. MARCH 29, 1993,

93040992594

# JUST SAY NO TO HORN, NOVEMBER 3

## Missouri Second District Voter Alert

### IF YOU HAVEN'T READ ANYTHING ELSE, READ THIS!!!

#### Ten Reasons Why Joan Kelly Horn Should Not Be Re-elected To Congress

As residents of the 2nd Congressional District, we have endured two years of non-leadership from liberal, big-spender Joan Kelly Horn. Her total inability to grasp even the simplest issues has produced nothing more than a *YES PERSON* to Vince Schoemehl and Dick Gephardt and other cronies, who are manipulating our lives. Here are ten reasons why you should not waste your vote on November 3:

1. **HEY BIG SPENDER:** while talking out of both sides of her mouth about stopping wasteful government spending, Horn has consistently voted in favor of more spending to the tune of \$3.5 trillion. She introduced a bill to balance the Federal budget and then voted against it when told to do so by Gephardt.
2. **HOGS AT THE TROUGH?** Joan beat Jack Buechner by calling him a "hog", but who is the true porker? Horn (\$129,500) and her husband, a professor at UMSL (\$90,000) make almost a quarter of a million bucks slurping at the public trough. Just like the paychecks at your house, right?
3. **2nd AMENDMENT VIOLATOR:** Horn has consistently voted to ban firearms, including shotguns, rifles and handguns used for hunting, self defense and target shooting, even in Olympic competition. She has consistently voted against deer hunting.
4. **LIVING IN LADUE:** while espousing family values, Horn always fails to talk about the fact that she and her current husband were told by the City of Ladue, to get married or quit living in sin. Yes, she was the one who was in the newspapers!
5. **POLITICAL REWARDS:** after Joan endorsed Vince Schoemehl for Governor, Horn's son was one of the first to sell-out to the airport. Despite repeated calls to reveal how much he got, Joan has refused. And Schoemehl's airport went to court to keep the records sealed.
6. **VOTED AGAINST JOBS AT MAC:** In addition to the space station project, Horn has repeatedly voted against federal defense projects that would ensure ongoing jobs at McDonnell Douglas, this region's largest employer.
7. **LET'S BE FRANK ABOUT THE MAIL:** Horn and Gephardt have both been identified by the National Taxpayers Union, a national spending watchdog group in Washington, as two of the country's biggest spenders on postage paid by the taxpayers. Horn says she spends \$.25 per address when she really spends \$.59 per district address (Post-Dispatch 3/24/92).
8. **NO GULF:** Horn was one of the few who voted against the Persian Gulf War.
9. **LIED ABOUT CHECKS:** Joan said she didn't bounce any checks at the House Bank and then had to own up to it when caught.
10. **LEFT COAST LIBERALS:** Why are some of her biggest campaign contributions from Helen Reddy and Jane Fonda? We sure don't need them in the 2nd District.

**LET'S GET SCHOEMEHL AND GEPHARDT OUT OF THE  
2ND DISTRICT**

**PAID FOR BY CITIZENS AGAINST HORN**

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 19, 1992

Kevin M. O'Keefe, Esq.  
Uthoff, Graeber, Bobinette & O'Keefe  
906 Olive Street, Suite 300  
St. Louis, MO 63101

RE: MUR 3687

Dear Mr. O'Keefe:

This letter acknowledges receipt on November 12, 1992, of a complaint you filed on behalf of your client, Loraine Miller, alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Bridgeton Air Defense, Inc., Bridgeton Air Defense Political Action Committee and Wilfried Adelt, as treasurer, Citizens Against Horn and Dominick Ferranto Jr., as treasurer, John B. Taylor and John Joseph Klobnak. 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 3687. 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,

A handwritten signature in black ink, appearing to be "L. Klein", is written over the name and title of the Assistant General Counsel.

Lisa E. Klein  
Assistant General Counsel

Enclosure  
Procedures

93040992596



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 19, 1992

Bridgeton Air Defense, Inc.  
c/o Tom Fehrenbacher, Registered Agent  
12030 Franclair  
Bridgeton, MO 63044

RE: MUR 3687

Dear Mr. Fehrenbacher:

The Federal Election Commission received a complaint which indicates that Bridgeton Air Defense, Inc. ("Bridgeton") 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 3687. Please refer to this number in all future correspondence.

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

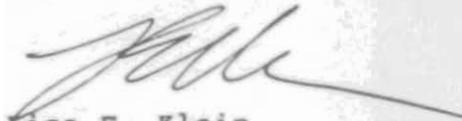
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed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

If you have any questions, please contact Dawn M. Odrowski, 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  
Assistant General Counsel

Enclosures

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

cc: John Joseph Klobnak, Director  
Bridgeton Air Defense, Inc.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 19, 1992

Wilfried Adelt, Treasurer  
Bridgeton Air Defense Political  
Action Committee  
14810 Woodford Way  
Bridgeton, MO 63044

RE: MUR 3687

Dear Mr. Adelt:

The Federal Election Commission received a complaint which indicates that Bridgeton Air Defense 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 complaint is enclosed. We have numbered this matter MUR 3687. 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 or 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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Wilfried Adelt, Treasurer  
Bridgeton Air Defense Political Action Committee  
Page 2

If you have any questions, please contact Dawn M. Odrowski, 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  
Assistant General Counsel

Enclosures

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

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 19, 1992

Dominick Ferranto, Jr., Treasurer  
Citizens Against Horn  
613 Woodbriar Lane  
St. Peters, MO 63376

RE: MUR 3687

Dear Mr. Ferranto:

The Federal Election Commission received a complaint which indicates that Citizens Against Horn ("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 3687. 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.

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Dominick Ferranto, Jr., Treasurer  
Citizens Against Horn  
Page 2

If you have any questions, please contact Dawn M. Odrowski, 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  
Assistant General Counsel

Enclosures

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

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 19, 1992

John Joseph Klobnak  
12740 Lonsdale  
St. Louis, MO 63044

RE: MUR 3687

Dear Mr. Klobnak:

The Federal Election Commission received a complaint which indicates that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3687. Please refer to this number in all future correspondence.

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

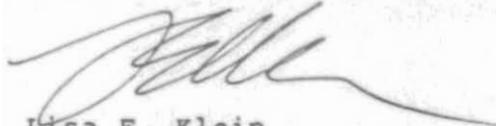
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed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

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John Joseph Klobnak  
Page 2

If you have any questions, please contact Dawn M. Odrowski, 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  
Assistant General Counsel

Enclosures

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

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 19, 1992

John B. Taylor  
12748 Marburn  
St. Louis, MO 63044

RE: MUR 3687

Dear Mr. Taylor:

The Federal Election Commission received a complaint which indicates that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3687. Please refer to this number in all future correspondence.

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

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John B. Taylor  
Page 2

If you have any questions, please contact Dawn M. Odrowski, 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  
Assistant General Counsel

Enclosures

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

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RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIN COPY ROOM  
Nov 30 12 40 PM '92

92 NOV 30 PM 4:20

Bridgeton Air Defense  
Political Action Committee (BADPAC)

Federal Election Commission  
General Council's Office  
Washington DC 20463  
Attn: Lisa E. Klein

22 November 1992

Re MUR 3687, Your letter 19 Nov 92  
Enclosed: Report of Receipts and Disbursements

Dear Mrs. Klein:

I received your letter and I was shocked about the seriousness of implications mentioned in that letter.

The Bridgeton Air Defense Political Action Committee (BADPAC) was formed in August 1990 by a local neighborhood group that is opposed to a planned expansion of the St. Louis airport into our City of Bridgeton. The neighborhood group consisting of citizens threatened to lose their homes and the quality of life, called themselves "Bridgeton Air Defense." The group found wide support in Bridgeton. In order to expand our cause in the political arena, it was felt that we should form a Political Action Committee.

After establishing a name for us in 1990, the importance of our organization diminished, which is probably best reflected in our financial history. The total annual income of our BADPAC (Line 19 of Federal Form) was

1990	\$ 2517.66
1991	\$ 1213.51
1992	\$ 335.73

This decline of BADPAC is offset by the involvement of the City of Bridgeton that is now actively fighting the airport expansion plan.

Being a lay person volunteering my time for a cause as the treasurer of BADPAC, I admit that I probably did not fulfill all the required reporting. However, I did all the reporting honestly and to the best of my knowledge. This is especially true in view our extremely small financial power of only \$335.73 for this year.

Now to the charges: Congress women Horn was openly supporting the airport expansion into Bridgeton. Naturally, this caused outrage in our community. But BADPAC can not be made responsible for actions done by private citizens, even when supported by a civic organization like Bridgeton Air Defense. BADPAC has not financed any of the charged items. BADPAC has not spent a penny in support of the "Citizens against Horn".

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It is understandable that a political candidate is desperate to fight for his/her reelection. Rep. Horn, who lost the election, was obviously not aware that BADPAC's worth was \$335, a fraction of the legal fees she and Ms. Miller spent to save her congressional seat.

Please let me know whether this response satisfies your needs. I do not have the time and the means to afford a legal representative.

*Wilfried Adelt*

Wilfried Adelt  
Treasurer of BADPAC  
14810 Woodford Way  
Bridgeton, Mo 63044  
Phone (314) 739-5117

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# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

USE FEC MAILING LABEL  
OR  
TYPE OR PRINT

1. C00247874 110292  
 WILFRIED H ADELT  
 BRIDGETON AIR DEFENSE POLITICAL  
 ACTION COMMITTEE (FKA BADPAC)  
 14810 WOODFORD WAY  
 BRIDGETON ST LOUIS MO 63044

2. FEC IDENTIFICATION NUMBER  
**C00247874**  
 3. This committee qualified as a multiple candidate committee DURING THIS Reporting Period on \_\_\_\_\_ (Date).

## 4. TYPE OF REPORT

(a) April 15 Quarterly Report  Monthly Report Due On: \_\_\_\_\_  
 July 15 Quarterly Report  February 20  June 20  October 20  
 October 15 Quarterly Report  March 20  July 20  November 20  
 January 31 Year End Report  April 20  August 20  December 20  
 July 31 Mid Year Report (Non-election Year Only)  May 20  September 20  January 31   
 Twelfth day report preceding \_\_\_\_\_ (Type of Election)  
 election on \_\_\_\_\_ in the State of \_\_\_\_\_  
 Thirtieth day report following the General Election on **3 Nov. 92** in the State of **MISSOURI**  
 Termination Report

(b) Is this Report an Amendment?  YES  NO

## SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>1 JAN 92</u> through <u>22 NOV 92</u>		
6. (a) Cash on Hand January 1, 19 <u>92</u>		\$ 200.20
(b) Cash on Hand at Beginning of Reporting Period	\$ 200.20	
(c) Total Receipts (from Line 19)	\$ 335.73	\$ 335.73
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 535.93	\$ 535.93
7. Total Disbursements (from Line 30)	\$ 350.79	\$ 350.79
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 185.14	\$ 185.14
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ /	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ /	

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

Type or Print Name of Treasurer: **WILFRIED H. ADELT**  
 14810 WOODFORD WAY  
 BRIDGETON (ST. LOUIS)  
 MISSOURI 63044 USA

Signature of Treasurer: *Wilfried Adelt* Date: **22 November '92**

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

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

(revised 1/1/91)

NAME OF COMMITTEE **BRIDGETON AIR DEFENSE PAC**

REPORT COVERING PERIOD  
 FROM **1 JAN 92** TO: **22 NOV 92**

**I. Receipts**

	COLUMN A Total This Period	COLUMN B Calendar Year
11. Contributions (other than loans) From:		
a. Individual/Persons Other Than Political Committees		
i. Itemized (use Schedule A)	300.-	300.-
ii. Unitemized	25.-	25.-
iii. Total (add i and ii) >	325.-	325.-
b. Political Party Committees		
c. Other Political Committees (such as PACs)		
d. Total Contributions (add a iii, b and c) >	325.-	325.-
12. Transfers From Affiliated/Other Party Committees		
13. All Loans Received		
14. Loan Repayments Received		
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.)		
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees		
17. Other Federal Receipts (Dividends, Interest, etc.)	10.73	10.73
18. Transfers from Nonfederal Account for Joint Activity		
19. Total Receipts (add 11d, 12, 13, 14, 15, 16, 17, and 18) >	335.73	335.73
20. Total Federal Receipts (subtract line 18 from line 19) >		

**II. Disbursements**

21. Operating Expenditures:		
a. Shared Federal/Non-Federal Activity (from Schedule H4)		
i. Federal Share		
ii. Non-Federal Share		
b. Other Federal Operating Expenditures		
c. Total Operating Expenditures (Add a i, a ii, and b)) >		
22. Transfers to Affiliated/Other Party Committees		
23. Contributions to Federal Candidates/Committees and Other Political Committees		
24. Independent Expenditures (use Schedule E)	295.60	295.60
25. Coordinated Expenditures Made by Party Committees (2 U.S.C. 441a(d)) (use Schedule F)		
26. Loan Repayments Made		
27. Loans Made		
28. Refunds of Contributions To:		
a. Individuals/Persons Other Than Political Committees		
b. Political Party Committees		
c. Other Political Committees (such as PACs)		
d. Total Contribution Refunds (Add a, b and c) >		
29. Other Disbursements	55.19	55.19
30. Total Disbursements (add 21c, 22, 23, 24, 25, 26, 27, 28d, and 29) >	350.79	350.79
31. Total Federal Disbursements (subtract line 21 a ii from line 30) >		

**III. Net Contributions/Operating Expenditures**

32. Total Contributions (other than loans)(from line 11d)	325.-	325.-
33. Total Contribution Refunds (from line 28d)	0.	
34. Net Contributions (other than loans)(subtract line 33 from 32)	325.-	325.-
35. Total Federal Operating Expenditures (add 21 a i and 21 b) >	0	0
36. Offsets to Operating Expenditures (from line 15)	0	0
37. Net Operating Expenditures (subtract line 36 from 35) >	0	0

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SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1  
FOR LINE NUMBER 112i

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

**BRIDGETON AIR DEFENSE PAC**

A. Full Name, Mailing Address and ZIP Code <b>JACK TAYLOR</b> <b>12748 MARBURY LANE</b> <b>BRIDGETON, MO 63044</b>	Name of Employer <b>D'ARCY</b>	Date (month, day, year) <b>JULY 25</b> <b>1992</b>	Amount of Each Receipt this Period <b>\$300.00</b>
	Occupation <b>ADVERTISING</b>		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): <b>DONATION</b>	Aggregate Year-to-Date > \$ <b>300.-</b>		

B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		

C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		

D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		

E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		

F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		

G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		

SUBTOTAL of Receipts This Page (optional)	<b>\$ 300.-</b>
TOTAL This Period (last page this line number only)	<b>\$ 300.-</b>

93040992611

SCHEDULE B

ITEMIZED DISBURSEMENTS

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)  
**BRIDGETON AIR DEFENSE PAC**

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
<b>KWWR-KXEO RADIO MUSIC INC. MEXICO, MO</b>	<b>RADIO TIME</b> Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>JULY 29, 1992</b>	<b>\$ 295.60</b>
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

93040992612

SUBTOTAL of Disbursements This Page (optional) .....	<b>\$ 295.60</b>
TOTAL This Period (last page this line number only) .....	<b>\$ 295.60</b>

92 DEC 10 AM 10:20

Response to MUR 3687

Dec 10 9 21 AM '92

12-3-92

item

1. I do not know where Coraine Miller lives.
2. Congresswoman Horn was a candidate for reelection.
3. I have no knowledge of exhibit #1 being distributed at the times and places stated.
4. It states reasons why Joan Kelly Horn should not be reelected.
5. I have no idea about what is meant by this question/statement.
6. What broadcast communications?
7. Year \_\_\_\_\_ is my phone #.
8. I have no idea about what is meant by this statement.
9. I know of no broadcast times. I heard/saw nothing on T.V./Radio.
10. A. on file Statement of organization "Citizens against Horn".  
 B. filed - 10-14-92 spent here show \$1000.00.  
 C. Citizens against Horn on file

93040992613

item 10.

D. on file

E. see 101+10

F. no response

G. no response

\* F+G I know nothing about BADs tax codes.

93040992614

To FEC

12-3-92

Please see items enclosed marked 1+2

Also in Oct 92, I recieved a phone call at my home from a person who identified themselves as a Miss Zigler. This person questioned me about the flyer. I answered her questions and then stated to Miss Zigler, "it's supper time here at my house give me a phone number and I will call you back." she hung up. My local phone company offers a service of redialing the last number that has called my phone. When this Miss Zigler hung up on me, I punched #69 and my phone automatically redialed Miss Zigler when the phone at which Miss Zigler had called from was answered the party at that phone identified themselves as "Joan Kelly Horn for Congress". I asked to speak to Miss Zigler. The person at Horn's stated, "there is no Miss Zigler here". I then asked to speak to the party who just called me, they then denied calling me. When I called them I identified myself when they call me they lie. My phone company states "When I redialed as I did I do in fact get the phone of the person who just called me."

Do I have grounds for a complaint on the actions I have described or on the items I enclosed marked 1+2.

Yours Dominick Ferrante Jr

93040992615

item #1

VFW-ENDORSEMET Horn

Marc Schlinkovson  
Post Dispatch

on 10/10/92  
@ 1345 Neal Holby of Congresswoman  
Horns office stated "VFW  
has endorsed Horn"

on 10/12/92  
0835 I called VFW-PAC  
@ 1-202-544-5868 office staff  
member Treasa "he is not endorsed  
Bob will call you back"  
1132 Treasa called back stated, "Bob  
told her not endorsed."

on 10/13/92  
0845 @ 1-636-8761 VFW-MO  
M. W. Bryant State ad gen Quartermaster  
stated, "not endorsed."

on 10/15/92  
0845 @ 1-202-544-5868 Director VFW-PAC  
James R. Currier stated, "Horn  
endorsed as of 10-14-92 letter mailed."

This raises questions in my mind

D Ferranto

1-447-2216

10-15-92

0900

22-141 50 SHEETS  
22-142 100 SHEETS  
22-144 200 SHEETS



93040992616

item # 2  
10. 14. 92 11:38 AM  
OCT 14 '92 18:08

\*JOAN KELLY HORN STL

PO 1  
P.2/2



**Veterans of Foreign Wars  
Political Action Committee**

200 Maryland Avenue, N.E. • Washington, D.C. 20002  
202-544-5868

James R. Currie  
Director

**NEWS RELEASE: October 14, 1992**

**VFW-PAC ENDORSES JOAN KELLY HORN:**

WASHINGTON, D.C.--The Board of Directors of the Veterans of Foreign Wars Political Action Committee (VFW-PAC) today announced the VFW-PAC's endorsement of Joan Kelly Horn in her bid for re-election to Missouri's Second Congressional District, United States House of Representatives.

According to John M. Carney, Commander-in-Chief of the 2.2-million member Veterans of Foreign Wars, "The purpose of the VFW-PAC is to support Congressional candidates who demonstrate their support for veterans' rights and national security issues mandated by the Veterans of Foreign Wars national convention. Ms. Horn's record on veterans' rights and a strong America makes her deserving of the VFW-PAC endorsement."

Organized in 1979, "... to advance the purposes of the Veterans of Foreign Wars through political action in federal elections," the VFW-PAC is an integral part of the VFW.

The VFW Political Action Committee is non-partisan and is supported through volunteer contributions from VFW and Auxiliary members.

**AFFIDAVIT OF JOHN JOSEPH KLOBNAK**

State of Missouri            )  
  ) SS.  
County of St. Louis         )

Comes now John Joseph Klobnak, of lawful age and having been first duly sworn upon his oath, deposes and states as follows:

1. My name is John Joseph Klobnak. I am a resident of the 2nd Congressional District, St. Louis County, Missouri. My address is 12740 Lonsdale, Bridgeton, Missouri 63044.

2. I am one of the Respondents in Matter MUR 3687 before the Federal Election Commission, being a Complaint filed by a Lorraine Miller. Upon information and belief, Lorraine Miller is or was an employee of Representative Joan Kelly Horn or of her re-election campaign.

3. I am a director of Bridgeton Air Defense, Inc. ("BAD"), a Missouri not-for-profit corporation. To the best of my knowledge, information and belief no funds of BAD have been expended for or on behalf of any group know as "Citizens Against Horn" or for any other political activity relative to Matter MUR 3687. Respondent further states that he did not personally contribute any funds to any group known as "Citizens Against Horn" nor is he a "leader" of any such group.

4. I am neither an officer nor a director of the Bridgeton Air Defense Political Action Committee and have no knowledge of its receipts and disbursements or whether it has filed reports with the Federal Election Commission.

5. The Respondent is unable to address the allegations contained in Paragraphs 3, 4, 5, 6, 7 and 8 of Mrs. Miller's Complaint filed in Matter MUR 3687 for the reason that those allegations are not directed to this Respondent.

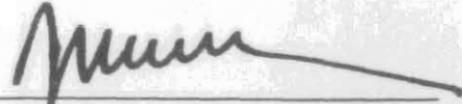
6. With respect to Paragraph 9 of Mrs. Miller's Complaint, this Respondent states that he never made any such statements to Mrs. Miller, nor has he ever met Mrs. Miller. Whether Respondent claimed to have prepared materials for broadcast advertisements and communications expressly advocating the defeat of Mrs. Horn is irrelevant since this Respondent neither prepared any such materials, nor did he cause any such materials to be prepared, nor did he have any knowledge of any such materials having been prepared or broadcast in the Greater St. Louis area.

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RECEIVED  
FEDERAL ELECTION COMMISSION

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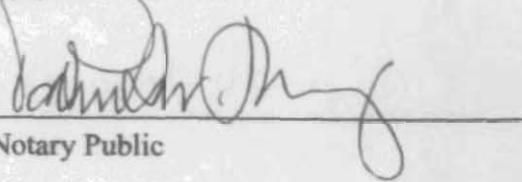
7. Complainant's Complaint is frivolous and should be dismissed as such for the reason that the Complaint was apparently filed on November 12, 1992, nine days after the November 3rd election, thereby making the relief requested by Complainant impossible. Further, Complainant obviously meant only to annoy and harass this Respondent in that the Respondent knew or should have known that no broadcast advertisements allegedly prepared by this Respondent were aired in the Greater St. Louis area prior to the November 3 election.

Because of the fact that this Respondent did not perform any of the acts complained of by Complainant in her Complaint, Respondent, John Joseph Klobnak respectfully requests that he be dismissed as a Respondent herein and that Matter MUR 3687 be closed as it pertains to him.



John Joseph Klobnak

Subscribed and sworn to before me this 3rd day of December, 1992.



Notary Public

My Commission Expires:

ROBERT W. MAY  
NOTARY PUBLIC, STATE OF MISSOURI  
MY COMMISSION EXPIRES 4/3/93  
CITY OF ST. LOUIS

93040992619

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3687

NAME OF COUNSEL: Robert W. May

ADDRESS: 7777 Bonhomme, Suite 2102  
St. Louis, MO 63105

TELEPHONE: (314) 721-0331

92 DEC 10 AM 10:26  
FEDERAL RESERVE BANK  
ST. LOUIS, MISSOURI

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.

3/ December 1942  
Date

[Signature]  
Signature

RESPONDENT'S NAME: John J. Klobnak

ADDRESS: 12740 Lonsdale  
Bridgeton, MO 63044

TELEPHONE: HOME(        )  
BUSINESS( 314 ) 434-6900

93040992620

**MAY & BERNE**

ATTORNEYS AT LAW

SUITE 2102

7777 BONHOMME AVENUE

ST. LOUIS (CLAYTON), MISSOURI 63105

TELEPHONE: (314) 721-0331

FACSIMILE: (314) 721-6740

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIN COPY ROOM

DEC 10 9 31 AM '92

ROBERT W. MAY\*  
RICHARD R. BERNE\*

December 7, 1992

\*LICENSED IN  
MISSOURI & ILLINOIS

**Via Facsimile (202) 219-3923  
and Regular Mail**

Federal Election Commission  
Washington, D.C. 20463

Attn: Dawn M. Odrowski, Esq.

Re: MUR 3687

Dear Ms. Odrowski:

The undersigned represents John Joseph Klobnak, one of the Respondents in the above matter.

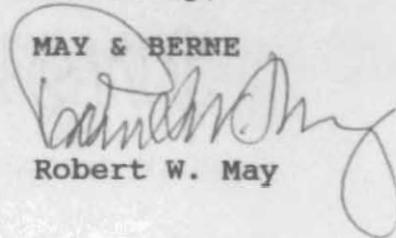
Per my conversation of today with Lisa Klein, I am enclosing herewith a Statement of Designation of Counsel which has been executed by Mr. Klobnak together with Mr. Klobnak's Affidavit in response to the Complaint in the above matter. Ms. Klein advised that it would be acceptable to file the enclosed by facsimile, following up with the original documents by regular mail.

If you have any questions in regard to the enclosed, please call. Thank you for your courtesy and cooperation.

Sincerely,

MAY & BERNE

Robert W. May



RWM/tno  
Enclosures  
cc: Mr. John J. Klobnak

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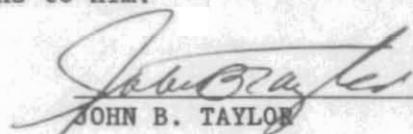
AFFIDAVIT OF JOHN B. TAYLOR

State of Missouri )  
                          ) SS.  
County of St. Louis )

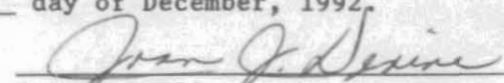
Comes now John B. Taylor, of lawful age and having been first duly sworn upon his oath, deposes and states as follows:

1. My name is John B. Taylor. I am a resident of the 2nd Congressional District, St. Louis County, Missouri. My address is 12748 Marburn Lane, Bridgeton, Missouri 63044.
2. I am one of the Respondents in Matter MUR 3687 before the Federal Election Commission being a Complaint filed by a Loraine Miller. Upon information and belief, Loraine Miller is or was an employee of Representative Joan Kelly Horn or of her re-election campaign.
3. I am a director of Bridgeton Air Defense, Inc. ("BAD"), a Missouri not-for-profit corporation. To the best of my knowledge, no funds of BAD were expended for or on behalf of any group known as "Citizens Against Horn" or for any political activity relative to matter MUR 3687. Respondent further states that he did not personally contribute any funds to any group known as "Citizens Against Horn" nor is he a leader of any such group.
4. I am neither an officer nor a director of The Bridgeton Air Defense Political Action Committee and have no knowledge of its receipts and disbursements or whether it has filed reports with the Federal Election Commission.
5. This respondent is unable to address the allegations contained in paragraphs 3,4,6,7,8 and 9 of Ms. Miller's Complaint filed in Matter MUR 3687 for the reason that these allegations are not directed to this Respondent.
6. With respect to Paragraph 5 of Ms. Miller's Complaint, this Respondent states that he never made any such statements to Ms. Miller, nor has he ever met Ms. Miller.

Because of the fact that this Respondent did not perform any of the acts complained of by Complainant in her Complaint, Respondent, John B. Taylor respectfully requests that he be dismissed as a Respondent herein and that Matter MUR 3687 be closed as it pertains to him.

  
JOHN B. TAYLOR

Subscribed and sworn to before me this 10<sup>th</sup> day of December, 1992.

  
Notary Public

My Commission Expires:           JOAN J. DEVINE, NOTARY PUBLIC  
STATE OF MISSOURI, ST. CHARLES COUNTY  
MY COMMISSION EXPIRES APRIL 9, 1994

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COMMISSION

MUR 3687

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COMMISSION  
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Dec 21 12 37 AM '92

To Lisa E. Klein :

Please excuse the tardiness in getting this to you  
and accept this affidavit.

Bridgeton Air Defense is an all volunteer  
organization and we let this one get into our  
normal monthly cycle and didn't realize the  
15 day return.

Thanks for your consideration

Thomas A. Schumaker  
Director Bridgeton Air Defense

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COMMISSION  
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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 22, 1992

Mr. Dominick Ferranto, Jr., Treasurer  
Citizens Against Horn  
613 Woodbriar Lane  
St. Peters, MO 63376

RE: MUR 3687

Dear Mr. Ferranto:

This is to acknowledge receipt on December 10, 1992, of your letter dated December 3, which was enclosed with your response to the complaint in MUR 3687. In your letter, you ask whether you have grounds for a complaint based on a phone call you received from someone seeking information regarding a flier paid for by Citizens Against Horn who failed to identify herself, or based on a news release issued by the Veterans of Foreign Wars PAC endorsing Joan Kelly Horn, a copy of which is attached to your letter together with notes of phone conversations you had with individuals from the VFW.

The Federal Election Campaign Act of 1971, as amended ("the Act") and Commission Regulations require that the contents of a complaint meet certain specific requirements. One of these requirements is that a complaint be sworn to and signed in the presence of a notary public and notarized. Your letter did not contain a notarization on your signature and was not properly sworn to. Therefore, we are not statutorily empowered to proceed with the handling of a compliance action unless all the statutory requirements are fulfilled. See 2 U.S.C. § 437g.

In order to file a legally sufficient complaint, you must swear before a notary that the contents of your complaint are true to the best of your knowledge and the notary must represent as part of the jurat that such swearing occurred. The preferred form is "Subscribed and sworn to before me on this \_\_\_ day of \_\_\_, 19\_\_." A statement by the notary that the complaint was sworn to and subscribed before him or her also will be sufficient.

Enclosed is a Commission brochure entitled "Filing a Complaint." I hope this material will be helpful to you should you wish to file a legally sufficient complaint with the Commission. Please remember, though, that the Federal Election Commission has jurisdiction only over matters relating to campaign financing as set forth in the Act and Chapters 95 and 96 of Title 26, United States Code. The acts described in your letter do not appear to relate to campaign financing. However,

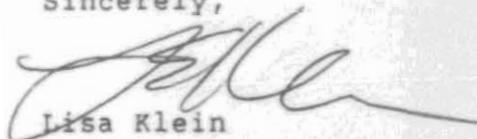
93040992625

Mr. Dominick Ferranto, Jr.  
Page 2

please feel free to file a legally sufficient complaint if you believe the matters described in, and attached to, your letter do constitute a violation of the Act or Chapters 95 and 96 of Title 26, United States Code and the Commission will be glad to review the matter as a complaint. For your convenience, copies of the Act and Commission Regulations are enclosed.

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

Sincerely,



Lisa Klein  
Assistant General Counsel

Enclosure  
Brochure  
Act  
Regulations

93040992626

MUR # 3687

ADDITIONAL DOCUMENTS WILL BE ADDED TO THIS FILE AS THEY BECOME AVAILABLE. PLEASE CHECK FOR ADDITIONAL MICROFILM LOCATIONS.

93040992627



FEDERAL ELECTION COMMISSION  
WASHINGTON DC 20541

THIS IS THE *End of* MUR# 3687

DATE FILMED 10/29/93 CAMERA NO. 2

CAMERAMAN MC

93040992628



FEDERAL ELECTION COMMISSION  
WASHINGTON DC 20463

Microfilm  
 Public Recds  
 Press

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 3687.

12/10/93

2  
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**THE READER IS REFERRED TO ADDITIONAL MICROFILM LOCATIONS  
FOR THE FOLLOWING DOCUMENTS PERTINENT TO THIS CASE**

1. Memo, General Counsel to the Commission, dated September 22, 1992, Subject: Priority System Report. See Reel 354, pages 1590-94.
2. Memo, General Counsel to the Commission, dated April 14, 1993, Subject: Enforcement Priority System. See Reel 354, pages 1595-1620.
3. Certification of Commission vote, dated April 28, 1993. See Reel 354, pages 1621-22.
4. General Counsel's Report, In the Matter of Enforcement Priority, dated December 3, 1993. See Reel 354, pages 1623-1740.
5. Certification of Commission vote, dated December 9, 1993. See Reel 354, pages 1741-1746.

23043543533



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DEC 10 1993

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Kevin M. O'Keefe, Esq.  
Uthoff, Graeber, Bobinette & O'Keefe  
906 Olive Street, Suite 300  
St. Louis, MO 63101

RE: MUR 3687

Dear Mr. O'Keefe:

On November 12, 1992, the Federal Election Commission received a complaint you filed on behalf of your client, Loraine Miller, alleging certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act").

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against Bridgeton Air Defense, Inc., Bridgeton Air Defense Political Action Committee and Wilfried Adelt, as treasurer, Citizens Against Horn and Dominick Ferranto, Jr., as treasurer, John B. Taylor, and John Joseph Klobnak. See attached narrative. Accordingly, the Commission closed its file in this matter. 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,

Dawn M. Odrowski  
Attorney

Attachment  
Narrative

Date the Commission voted to close the file: DEC 09 1993

30435434

MUR 3687

BRIDGETON AIR DEFENSE, INC. ET AL.

This complaint alleges that Respondents distributed a flier expressly advocating the defeat of Congresswomen Joan Kelly Horn without the appropriate disclaimer; that the individual or entity who paid for the flier failed to report the expenses associated with it; that Respondent Bridgeton Air Defense PAC (BADPAC) and Citizens Against Horn (CAH) failed to file reports and to register in a timely manner, respectively; and that Respondent Bridgeton Air Defense, Inc., a non-profit corporation connected to BADPAC, may have spent corporate funds to defeat the Congresswoman. CAH asserts it spent less than \$1,000 on the flier. BADPAC filed a report covering the period between January 1 and November 22, 1992, the date of its response. BADPAC was formed by a neighborhood group opposed to a planned airport expansion and its activity has declined since the City of Bridgeton began actively fighting the airport expansion. BADPAC's current reports reflect its declining activity; as of December 31, it had \$170 cash on hand.

This matter involves inexperienced players, no substantial amounts, and no significant issues relative to the other issues pending before the Commission. Also, there is no indication of any serious intent to violate the FECA.

23043543535



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DEC 10 1993

Robert W. May, Esq.  
May & Berne  
7777 Bonhomme Avenue, Suite 2102  
St. Louis, MO 63105

RE: MUR 3687  
John Klobnak

Dear Mr. May:

On November 19, 1992, the Federal Election Commission notified your client, John Klobnak, 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 has determined to exercise its prosecutorial discretion and to take no action against John Klobnak. See attached narrative. Accordingly, the Commission closed its file in this matter.

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 me at (202) 219-3400.

Sincerely,

Dawn M. Odrowski  
Attorney

Attachment  
Narrative

Date the Commission voted to close the file: DEC 09 1993

23043543536

MUR 3687  
BRIDGETON AIR DEFENSE, INC. ET AL.

This complaint alleges that Respondents distributed a flier expressly advocating the defeat of Congresswomen Joan Kelly Horn without the appropriate disclaimer; that the individual or entity who paid for the flier failed to report the expenses associated with it; that Respondent Bridgeton Air Defense PAC (BADPAC) and Citizens Against Horn (CAH) failed to file reports and to register in a timely manner, respectively; and that Respondent Bridgeton Air Defense, Inc., a non-profit corporation connected to BADPAC, may have spent corporate funds to defeat the Congresswoman. CAH asserts it spent less than \$1,000 on the flier. BADPAC filed a report covering the period between January 1 and November 22, 1992, the date of its response. BADPAC was formed by a neighborhood group opposed to a planned airport expansion and its activity has declined since the City of Bridgeton began actively fighting the airport expansion. BADPAC's current reports reflect its declining activity; as of December 31, it had \$170 cash on hand.

This matter involves inexperienced players, no substantial amounts, and no significant issues relative to the other issues pending before the Commission. Also, there is no indication of any serious intent to violate the FECA.

3043543537



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DEC 10 1993

Dominick Ferranto, Jr., Treasurer  
Citizens Against Horn  
613 Woodbriar Lane  
St. Peters, MO 63376

RE: MUR 3687  
Citizens Against Horn and  
Dominick Ferranto, Jr., as treasurer

Dear Mr. Ferranto:

On November 19, 1992, the Federal Election Commission notified Citizens Against Horn and you, 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 has determined to exercise its prosecutorial discretion and to take no action against Citizens Against Horn and you, as treasurer. See attached narrative. Accordingly, the Commission closed its file in this matter.

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 me at (202) 219-3400.

Sincerely,

Dawn M. Odrowski  
Attorney

Attachment  
Narrative

Date the Commission voted to close the file:

DEC 09 1993

23043543538

MUR 3687  
BRIDGETON AIR DEFENSE, INC. ET AL.

This complaint alleges that Respondents distributed a flier expressly advocating the defeat of Congresswomen Joan Kelly Horn without the appropriate disclaimer; that the individual or entity who paid for the flier failed to report the expenses associated with it; that Respondent Bridgeton Air Defense PAC (BADPAC) and Citizens Against Horn (CAH) failed to file reports and to register in a timely manner, respectively; and that Respondent Bridgeton Air Defense, Inc., a non-profit corporation connected to BADPAC, may have spent corporate funds to defeat the Congresswoman. CAH asserts it spent less than \$1,000 on the flier. BADPAC filed a report covering the period between January 1 and November 22, 1992, the date of its response. BADPAC was formed by a neighborhood group opposed to a planned airport expansion and its activity has declined since the City of Bridgeton began actively fighting the airport expansion. BADPAC's current reports reflect its declining activity; as of December 31, it had \$170 cash on hand.

This matter involves inexperienced players, no substantial amounts, and no significant issues relative to the other issues pending before the Commission. Also, there is no indication of any serious intent to violate the FECA.

23043543539



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

DEC 10 1993

Wilfried Adelt, Treasurer  
Bridgeton Air Defense Political  
Action Committee  
14810 Woodford Way  
Bridgeton, MO 63044

RE: MUR 3687  
Bridgeton Air Defense Political  
Action Committee and  
Wilfried Adelt, as treasurer

Dear Mr. Adelt:

On November 19, 1992, the Federal Election Commission notified you 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 has determined to exercise its prosecutorial discretion and to take no action against the Bridgeton Air Defense Political Action Committee and you, as treasurer. See attached narrative. Accordingly, the Commission closed its file in this matter.

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 me at (202) 219-3400.

Sincerely,

*Dawn M. Odrowski*

Dawn M. Odrowski  
Attorney

Attachment  
Narrative

Date the Commission voted to close the file:

DEC 10 1993

23043543540

MUR 3687  
BRIDGETON AIR DEFENSE, INC. ET AL.

This complaint alleges that Respondents distributed a flier expressly advocating the defeat of Congresswomen Joan Kelly Horn without the appropriate disclaimer; that the individual or entity who paid for the flier failed to report the expenses associated with it; that Respondent Bridgeton Air Defense PAC (BADPAC) and Citizens Against Horn (CAH) failed to file reports and to register in a timely manner, respectively; and that Respondent Bridgeton Air Defense, Inc., a non-profit corporation connected to BADPAC, may have spent corporate funds to defeat the Congresswoman. CAH asserts it spent less than \$1,000 on the flier. BADPAC filed a report covering the period between January 1 and November 22, 1992, the date of its response. BADPAC was formed by a neighborhood group opposed to a planned airport expansion and its activity has declined since the City of Bridgeton began actively fighting the airport expansion. BADPAC's current reports reflect its declining activity; as of December 31, it had \$170 cash on hand.

This matter involves inexperienced players, no substantial amounts, and no significant issues relative to the other issues pending before the Commission. Also, there is no indication of any serious intent to violate the FECA.

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DEC 10 1993

John B. Taylor  
12748 Marburn Lane  
Bridgeton, MO 63044

RE: MUR 3687  
John B. Taylor

Dear Mr. Taylor:

On November 19, 1992, the Federal Election Commission notified you 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 has determined to exercise its prosecutorial discretion and to take no action against you. See attached narrative. Accordingly, the Commission closed its file in this matter.

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 me at (202) 219-3400.

Sincerely,

*Dawn M. Odrowski*

Dawn M. Odrowski  
Attorney

Attachment  
Narrative

Date the Commission voted to close the file: DEC 10 1993

23043543542

MUR 3687  
BRIDGETON AIR DEFENSE, INC. ET AL.

This complaint alleges that Respondents distributed a flier expressly advocating the defeat of Congresswomen Joan Kelly Horn without the appropriate disclaimer; that the individual or entity who paid for the flier failed to report the expenses associated with it; that Respondent Bridgeton Air Defense PAC (BADPAC) and Citizens Against Horn (CAH) failed to file reports and to register in a timely manner, respectively; and that Respondent Bridgeton Air Defense, Inc., a non-profit corporation connected to BADPAC, may have spent corporate funds to defeat the Congresswoman. CAH asserts it spent less than \$1,000 on the flier. BADPAC filed a report covering the period between January 1 and November 22, 1992, the date of its response. BADPAC was formed by a neighborhood group opposed to a planned airport expansion and its activity has declined since the City of Bridgeton began actively fighting the airport expansion. BADPAC's current reports reflect its declining activity; as of December 31, it had \$170 cash on hand.

This matter involves inexperienced players, no substantial amounts, and no significant issues relative to the other issues pending before the Commission. Also, there is no indication of any serious intent to violate the FIECA.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

DEC 10 1993

Bridgeton Air Defense, Inc.  
c/o Thomas R. Fehrenbacher, Registered Agent  
12030 Franclair  
Bridgeton, MO 63044

RE: MUR 3687  
Bridgeton Air Defense, Inc.

Dear Mr. Feherenbacher:

On November 19, 1992, the Federal Election Commission notified you 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 has determined to exercise its prosecutorial discretion and to take no action against Bridgeton Air Defense, Inc. See attached narrative. Accordingly, the Commission closed its file in this matter.

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 me at (202) 219-3400.

Sincerely,

Dawn M. Odrowski  
Attorney

Attachment  
Narrative

Date the Commission voted to close the file: DEC 09 1993

73043544

MUR 3687

BRIDGETON AIR DEFENSE, INC. ET AL.

This complaint alleges that Respondents distributed a flier expressly advocating the defeat of Congresswomen Joan Kelly Horn without the appropriate disclaimer; that the individual or entity who paid for the flier failed to report the expenses associated with it; that Respondent Bridgeton Air Defense PAC (BADPAC) and Citizens Against Horn (CAH) failed to file reports and to register in a timely manner, respectively; and that Respondent Bridgeton Air Defense, Inc., a non-profit corporation connected to BADPAC, may have spent corporate funds to defeat the Congresswoman. CAH asserts it spent less than \$1,000 on the flier. BADPAC filed a report covering the period between January 1 and November 22, 1992, the date of its response. BADPAC was formed by a neighborhood group opposed to a planned airport expansion and its activity has declined since the City of Bridgeton began actively fighting the airport expansion. BADPAC's current reports reflect its declining activity; as of December 31, it had \$170 cash on hand.

This matter involves inexperienced players, no substantial amounts, and no significant issues relative to the other issues pending before the Commission. Also, there is no indication of any serious intent to violate the FECA.

23043543545