



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

THIS IS THE BEGINNING OF MUR # 3719

DATE FILMED 10/29/93 CAMERA NO. 2

CAMERAMAN MC

93040993169



MUR 3719

STATE OF MISSOURI
CAMPAIGN FINANCE REVIEW BOARD
P.O. BOX 1254
JEFFERSON CITY, Mo. 65102

314/751-2020
1-800/392-8660

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIN ROOM
Mason N. Sinner
Administrator

DEC 1 12 19 PM '92

Ms. Maura Callaway
Office of General Counsel
Federal Election Commission
999 E. Street N.W.
Washington, D.C. 20463

92 DEC -1 PM 4:24

RECEIVED
FEDERAL ELECTION COMMISSION

November 23, 1992

Dear Ms. Callaway:

Enclosed please find the original complaint filed by Mr. Paul Brown against the Idea Center.

If you have any questions about this, please call me.

Sincerely,

Michael C. Reid
Director of Compliance

MCR:as

Enclosure

93040993170



RECEIVED
FEDERAL ELECTION
COMMISSION
MAIN COPY ROOM

3685

Nov 16 11 23 AM '92

STATE OF MISSOURI
CAMPAIGN FINANCE REVIEW BOARD
P.O. BOX 1254
JEFFERSON CITY, Mo. 65102

Marion N. Sinnett
Administrator

314/751-2020
1-800/392-8660

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

RECEIVED
FEDERAL ELECTION COMMISSION
92 NOV 16 PM 3:30

November 9, 1992

RE: Paul M. Brown/The Idea Center

Dear Sir:

The enclosed complaint was filed with the Campaign Finance Review Board of Missouri. The Board has determined that this complaint does not fall within their purview and has instructed me to forward this complaint to you.

Sincerely,

Marion N. Sinnett
Administrator

MNS:as

Enclosure

93040993171

PROTECT OUR FUTURE WITH YOUR VOTE

Whatever happened to the traditional Republican values of Abraham Lincoln?

The ghost of the Ayatollah Khomeini is riding high over America as George Bush (having been kidnapped and brainwashed by the hard-right, fanatic fringe of the Republican Party) leads their desperate attack on our traditional values by trying to turn our heritage over to the greedy, the selfish, the ignorant and the superstitious.

President Bush, nice person that he is, has become the American Ayatollah—except that he is not operating on his own principles or philosophy which he lacks the vision to possess personally.



RESPONSIBILITY

"This nation, under God, shall have a new birth of freedom — and that government of the people, by the people, for the people, shall not perish from the earth."

ABRAHAM LINCOLN

religious strife and hatred like that of Yugoslavia where Serbs, Croats, Muslims, Roman Catholics and Eastern Orthodox Catholics are all destroying one another.

Ironically, most of our forebears came to this country to escape this kind of religious and ethnic intolerance in Europe.

Our founding fathers, led by Thomas Jefferson, fostered intellectual freedom and the separation of Church and State as the pillars of American Democracy.



TOLERANCE

"I swear before the altar of God, eternal hostility to every form of tyranny over the mind of man."

THOMAS JEFFERSON

children not to live with them—all of which insures that our jails and mental institutions will be kept full and that the quality of our society will be constantly degraded.

He and his administration lack the vision and the drive to create and present a better system to the American public.

Teddy Roosevelt was America's Trustbuster, Conservationist and Protector of Working Men's Rights against the Malefactors of Great Wealth.

Roosevelt used his Presidency as a "bloody pulpit" to inspire Americans with a vision of the future. Unfortunately, George Bush presents no future plan and fails to inspire the American people with his own convictions. He has not acted with determination or imagination to solve our greatest problems.

The Bush administration has failed to reduce drug trafficking and the use of drugs in our society. White-collar crime has escalated under the selfish example of many unscrupulous supporters of Reagan and Bush (witness Ivan Boesky, Michael Milken, Ross Johnson and Charles Keating). And, sadly, the conservation tradition of Teddy Roosevelt has been sabotaged by the Bush Administration. They are running wild with efforts to waste our natural resources and to despoil our environment.

Also, ignoring the earth's limitations, religious bigots in the Reagan and Bush administrations have stopped American aid to the United Nations for family planning around the world—even though the exploding birthrate and uncontrolled population growth is the biggest problem that the human race now faces. We are on the road to destruction and George Bush is doing nothing but accelerating the pace.

The "puppet masters" who control George Bush are notorious for their lack of intelligence, wisdom, responsibility and respect for the independent quest for knowledge and logical solutions. They are creatures of the Dark Ages and the Inquisition.

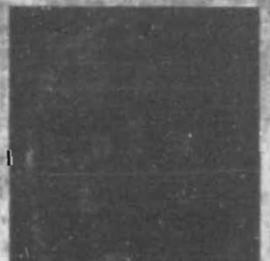
The John Sununu, Henry Hyde, Jesse Helms, Orrin Hatch and Phyllis Schlafly, who have been embraced by George Bush, represent the fanatic fringe of the Republican Party. They are a clear and present danger to all Americans who value their heritage of freedom. We must stand up to this challenge now—and the first requirement is to defeat George Bush to show that this un-American behavior will not be tolerated.

Therefore, VOTE FOR BILL CLINTON FOR PRESIDENT AND AL GORE FOR VICE PRESIDENT...and for all courageous, thinking Republican candidates who are not captives of the religious fundamentalists. Also, we are recommending that Bill Clinton appoint BOSS PEROT to lead a new "DEPARTMENT OF NATIONAL GOALS"—to help reduce our deficit and to keep this country on a clear, correct course into the future.



FREEDOM

"Give me your tired, your poor, your huddled masses yearning to breathe free... I lift my lamp beside the golden door."



COURAGE

a message from...

THE IDEA CENTER



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 9, 1992

Marion N. Sinnett
Administrator
State of Missouri
Campaign Finance Review Board
Post Office Box 1254
Jefferson City, MO 65102

RE: MUR 3719

Dear Ms. Sinnett:

This is to acknowledge receipt of your letter dated November 9, 1992, advising us of the possibility of a violation of the Federal Election Campaign Act of 1971, as amended ("the Act") by the Idea Center. We are currently reviewing the matter and will advise you of the Commission's determination.

If you have any questions or additional information, please call Joi L. Roberson, the staff member assigned to this matter, at (202) 219-3400. Our file number for this matter is MUR 3719.

Pursuant to 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A), the Commission's review of this matter shall remain confidential until the file has been closed.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

93040993174

R



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 9, 1992

Paul M. Brown
12311 Conway Road
St. Louis, MO 63141

RE: MUR 3719

Dear Mr. Brown:

This letter acknowledges receipt on December 1, 1992, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by The Idea Center. Your complaint was forwarded to us by the State of Missouri, Campaign Finance Review Board on November 9, 1992. 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 3719. 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

93040993175

C



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 9, 1992

The Idea Center
c/o Paul Flum Ideas, Inc.
11100 Linpage
St. Louis, MO 63132

RE: MUR 3719

Dear Mr. Flum:

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 3719. 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.

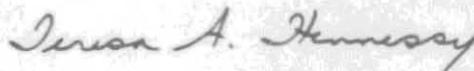
93040993176

R

The Idea Center
Paul Flum Ideas, Inc.
Page 2

If you have any questions, please contact Joi L. Roberson, the staff member 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
Assistant General Counsel

Enclosures

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

93040993177

PAUL FLUM *ideas* INC. IDEA CENTER

December 15, 1992

Ms. Teresa H. Hennessy
Assistant General Counsel
Federal Election Commission
Washington, D.C. 20463

Dear Ms. Hennessy:

MUR 3719

We received your letter dated December 9 advising us of another complaint with regard to the statement ran in the St. Louis Post Dispatch on October 11, 1992.

We have already responded to a similar complaint as requested in your letter dated November 12, 1992. Our letter of November 24, 1992 (copy attached) addresses each of the same requests for your letter of December 9.

Please consider this letter along with a copy of our November 24 correspondence as satisfying your requirements for a complete response to the second complaint.

If you should have any questions or comments, please don't hesitate to contact me at your earliest convenience.

Sincerely,

Paul Flum
Paul Flum
President

cc: Joi L. Roberson ✓

RECEIVED
FEDERAL ELECTION COMMISSION
92 DEC 21 PM 2:19

RECEIVED
FEDERAL ELECTION COMMISSION
MAIN COPY ROOM
Dec 21 1 45 PM '92

23040993178

PAUL FLUM *ideas* INC.

November 24, 1992

CENTER

Ms. Teresa H. Hennessy
Assistant General Counsel
Federal Election Commission
Washington, D.C. 20463

MUR 3685

Dear Ms. Hennessy:

We are in receipt of your letter dated November 12, 1992 advising me of a complaint received against the article placed in the St. Louis Post-Dispatch on October 11, 1992.

I have talked to Ms. Joi L. Roberson to explain the situation, and she requested that I respond to the complaint from Ms. Elaine Middendorf in writing which I am doing here.

I feel this complaint should be dismissed for the following reasons:

- 1) As a private individual, I have the First Amendment guaranteeing me the right to express my opinions freely.
- 2) This article was not paid for by any political machinery -- but rather, out of my own personal funds.
- 3) My means of doing this is through the medium of "The Idea Center" which is my contribution as a citizen to fulfill my obligation to the country. "The Idea Center" is located at my business address and produces a publication called "America and the Future" which goes to Congressmen, Senators, the White House, etc. and deals with foreign policy, domestic issues, etc., and has been entered into the Library of Congress.
- 4) This article was not involved in any way with any of the election committees for any of the political candidates -- presidential or otherwise.
- 5) I travel throughout the world. I visit our U.S. embassies, interview ambassadors and keep knowledgeable about foreign policy and government in general, and have developed significant correspondence with elected officials and policy makers under "The Idea Center" name. Their correspondence has always reached me with this name and zip code.

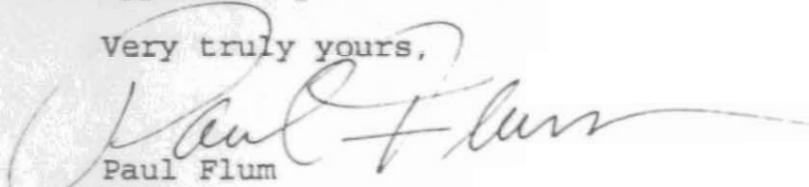
93040993179

- 93040993180
- 6) However, I have never run an advertisement with a political message until the first presidential debate in St. Louis. I felt strongly that the message I prepared was an important and necessary one to preserve our basic American freedoms and arranged to run same in the St. Louis Post-Dispatch.
 - 7) "The Idea Center" and "American and the Future" are both registered and trademarked by the U.S. Government as official names of our organization and our publicity.
 - 8) The complainant, Elaine Middendorf, had no difficulty establishing who wrote the article when she called the St. Louis Post-Dispatch. There was no attempt to hide or mask our identity.
 - 9) Since this was my first political ad, I was unaware of any legal requirement. However, I boldly named our organization and the city of St. Louis, MO and zip code, 63132.
 - 10) If this article required the "Political message paid for by...", why didn't the St. Louis Post-Dispatch advise me of this requirement.? We worked closely with them to meet their deadline, and they had ample opportunity to review the material and decide if it required any further modification before printing. I would have been glad to add the required verbiage had I been notified of such.

Based on the above information, I respectfully submit that the complaint be dismissed.

I look forward to receiving your decision at the earliest opportunity.

Very truly yours,



Paul Flum
President

cc: Joi L. Roberson

MUR # 3719

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

93040993181



FEDERAL ELECTION COMMISSION

WASHINGTON DC 20461

THIS IS THE End of MUR# 3719

DATE FILMED 10/29/93 CAMERA NO. 2

CAMERAMAN MC

93040993182



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

Microfilm
 Public Records
 Press

THE FOLLOWING DOCUMENTATION IS ADDED TO
THE PUBLIC RECORD IN CLOSED MUR 3719.

12/10/93

23043543650

**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.

23043543651



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Marion N. Sinnet, Administrator
State of Missouri
Campaign Finance Review Board
P.O. Box 1254
Jefferson City, MO 65102

RE: MUR 3719

Dear Ms. Sinnet:

This is in reference to the matter involving the Idea Center which your office referred to the Federal Election Commission on December 1, 1992.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against the Idea Center. See attached narrative.

Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

We appreciate your cooperation in helping the Commission meet its enforcement responsibilities under the Federal Election Campaign Act of 1971, as amended.

If you have any questions, please contact Joi Roberson, the attorney assigned to this matter, at (202) 219-3400.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Attachment
Narrative

Date the Commission voted to close the file:

DEC 09 1993

230.43543652

MUR 3719
The Idea Center

The Missouri Campaign Finance Review Board referred a complaint from Paul Brown. As in MUR 3685, the complaint alleged that in 1992 the Idea Center ran an ad supporting Clinton/Gore that lacked a proper disclaimer. The complaint did not specify the extent of distribution of the ad. Additionally, it appears that the Idea Center also may have failed to register and report with the Commission. The respondent stated that his personal funds paid for the ad although he used the Idea Center, located at his business address, as the "medium" for the ad.

This matter has little or no impact on the process, involves no significant issue relative to the other issues pending before the Commission, and involves no substantial amounts of money. Additionally, there is no indication of serious intent by the respondents to violate the FECA.

230.43543653



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

The Idea Center
c/o Paul Flum Ideas, Inc.
11100 Linpage Place
St. Louis, MO 63132

RE: MUR 3719

Dear Sirs:

On December 9, 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 Idea Center. 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,

Joi L. Roberson
Joi L. Roberson

Attachment
Narrative

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

230.43543654

MUR 3719
The Idea Center

The Missouri Campaign Finance Review Board referred a complaint from Paul Brown. As in MUR 3685, the complaint alleged that in 1992 the Idea Center ran an ad supporting Clinton/Gore that lacked a proper disclaimer. The complaint did not specify the extent of distribution of the ad. Additionally, it appears that the Idea Center also may have failed to register and report with the Commission. The respondent stated that his personal funds paid for the ad although he used the Idea Center, located at his business address, as the "medium" for the ad.

This matter has little or no impact on the process, involves no significant issue relative to the other issues pending before the Commission, and involves no substantial amounts of money. Additionally, there is no indication of serious intent by the respondents to violate the FECA.

230.43543655



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1992

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Paul M. Brown
12311 Conway Road
St. Louis, MO 63141

RE: MUR 3719

Dear Mr. Brown:

On December 1, 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 has determined to exercise its prosecutorial discretion and to take no action against The Idea Center. 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,

Joi L. Roberson
Joi L. Roberson

Attachment
Narrative

Date the Commission voted to close the file: DEC 09 1992

23043543656

MUR 3719
The Idea Center

The Missouri Campaign Finance Review Board referred a complaint from Paul Brown. As in MUR 3685, the complaint alleged that in 1992 the Idea Center ran an ad supporting Clinton/Gore that lacked a proper disclaimer. The complaint did not specify the extent of distribution of the ad. Additionally, it appears that the Idea Center also may have failed to register and report with the Commission. The respondent stated that his personal funds paid for the ad although he used the Idea Center, located at his business address, as the "medium" for the ad.

This matter has little or no impact on the process, involves no significant issue relative to the other issues pending before the Commission, and involves no substantial amounts of money. Additionally, there is no indication of serious intent by the respondents to violate the FECA.

2 3 0 . 4 3 5 4 3 6 5 7